



August 14, 2026

California Environmental Protection Agency
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Submitted via Email

RE: Preliminary 2026 Designation of Disadvantaged Communities

To whom it may concern,

On behalf of those undersigned, we appreciate the opportunity to comment on the Preliminary 2026 Disadvantaged Communities (DAC) Designation. We recognize the significant work that CalEPA and OEHHA have undertaken to update this designation and appreciate the four proposed designation categories.

Those undersigned have identified specific census tracts within the communities they serve that are not captured in the preliminary designation despite the communities' documented pollution burden and socioeconomic vulnerability. We understand that our experience may not be unique as other groups working in different regions of the state may be encountering comparable gaps where lived experience and on-the-ground conditions are not reflected in the tract-level data or scoring.

To strengthen the process for future designations, we offer the following recommendations:

1. **Allow submission of local income surveys to establish accurate median household incomes.** U.S. Census data is sometimes aggregated at a geographic scale that masks the conditions of a smaller community within it, which can cause real income burden to go uncaptured. This has been a consistent obstacle for low-income unincorporated communities in parts of the San Joaquin and Coachella Valleys. We recommend that CalEPA and OEHHA provide an option for communities to submit local income surveys to establish accurate median

household income when official Census data does not reflect actual conditions on the ground. The California State Water Resources Control Board already uses this approach in its grant program, and this offers a model that CalEPA and OEHHA could adapt for the DAC designation and future CalEnviroScreen updates.

2. **Conduct expansive outreach on gentrification, income inequality, and other methodological concerns.** As CalEPA and OEHHA consider future updates to CalEnviroScreen, we recommend early and expansive outreach to community-based organizations, tenant advocates, and researchers on how gentrification and income inequality could be reflected in the tool. Communities experiencing active displacement often see their pollution burden and demographic indicators shift in ways that mask ongoing harm, and this population is at risk of falling out of DAC designation even as impacts persist. This outreach should also address other methodological concerns that communities and groups in the Bay Area and elsewhere have raised about CES. A dedicated engagement process ahead of any methodology change would help ensure these dynamics are captured equitably.
3. **Publish a granular analysis of how the DAC designation is actually used across agencies.** We recommend that CalEPA compile and publish an analysis of which state agencies and grant programs rely on the DAC designation, how it is applied relative to separate “low-income community” designation, and what factors drive an agency’s choice between the two. Many funding and permitting decisions turn on this distinction, yet the practical, program-level logic agencies use is not always transparent to the public. Greater granularity, ideally in an agency by agency table or summary, would help communities and groups understand and effectively use the designation.
4. **Provide guidance on how CES and the DAC designation are used in agency decision-making.** Specifically we ask CalEPA to clarify:
 - a. For what purposes, and by which programs and grants, is the DAC designation map used?
 - b. Is DAC status used exclusively to determine eligibility, or are DAC status and CES also weighted in the application evaluation process?
 - c. Are there additional eligibility criteria for those state programs that might help address gaps or limitations in the tool?
5. **Encourage cross-agency coordination toward consistent, well-documented mapping.** We encourage CalEPA to work with other state agencies to align the various maps used to identify disadvantaged and low-income communities, so

that boundaries, underlying data, and timelines are as consistent as possible across programs. Divergent maps administered by different agencies create confusion, inequitable outcomes, and administrative burden for the same communities seeking to access multiple state resources

- a. As a starting point, we recommend that CalEPA identify the multiple maps and tools currently used across agencies and clarify the purpose and limitations of each.

6. More information is needed to provide recommendations on additional designation categories. During this process, our coalition and other allied organizations have been asked for feedback on several possible changes to how DAC-qualifying tracts are identified, including a regional top 10-percent threshold for CalEnviroScreen 5.0 overall scores, a higher statewide threshold of 35 percent in place of the current 25 percent, and carrying forward CalEnviroScreen 3.0 DACs alongside those from 4.0. For most of these options, we were not shown the underlying data or modeling needed to understand how they would actually change the map, and it is difficult to say whether any of them would better capture communities we know to be overburdened, including rural areas that current tract boundaries tend to underrepresent. We ask that CalEPA release the supporting analysis behind each option under consideration and build in additional rounds of public review before any changes to the designation categories are finalized.

We thank CalEPA for their continued commitment to taking in feedback and providing responses which will make this whole thing more accurately represented for overburdened communities. We look forward to the opportunity to discuss these recommendations further before the 2026 Final Designation is finalized.

Sincerely,

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