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August 14, 2026

California Environmental Protection Agency

RE: COMMENTS ON THE 2026 PRELIMINARY DISADVANTAGED COMMUNITIES DESIGNATIONS

Dear CalEPA staff,

On behalf of the City/County Association of Governments of San Mateo County (C/CAG), a joint powers authority that represents all jurisdictions in San Mateo County through its 21-member Board of Directors, we thank you for the opportunity to comment on the 2026 Preliminary Disadvantaged Communities (DAC) Designations.

C/CAG respectfully recommends that CalEPA **establish a fifth, supplemental review pathway to DAC designation** for communities that demonstrate substantial pollution burden and socioeconomic vulnerability but that are not captured by the four proposed designation pathways. C/CAG further recommends this pathway be open to geographic areas presented a scale finer than the census tract level. This pathway could tie to relevant environmental justice analyses developed through the SB 1000 General Plan process, giving meaningful recognition to locally identified communities in State funding decisions. This proposed supplemental pathway is particularly important for high-cost regions such as San Mateo County, where statewide income measures may understate economic hardship, and where single census tracts may contain communities experiencing a range of vulnerability.

We offer the following considerations in support of this recommendation:

- 1. Statewide application of a federal poverty threshold may understate hardship in high-cost regions:** As with the prior versions of CalEnviroScreen (CES), the “Socioeconomic Factor – Poverty” indicator, which uses a threshold of 200 percent of the federal poverty level, is not scaled to reflect local or regional differences. In the Bay Area, households may have higher incomes than state averages while still struggling to meet basic needs because of substantially higher costs of living. A supplemental pathway could allow consideration of this local context.
- 2. Census-tract level analysis may mask concentrated disadvantage:** Lower-income populations may live within census tracts that also contain substantial numbers of higher-income households. Finer scale data can help identify communities facing

economic hardship and environmental burdens that are obscured by tract-level averages.

- 3. A supplemental pathway would be consistent with CalEPA's proposed approach:**
CalEPA's currently proposed DAC designation pathways already recognize criteria beyond current CES 5.0 scoring by including carry-over of census tracts from the 2022 DAC designation and Tribal Lands. A supplemental pathway would similarly recognize that CES scoring alone may not capture every dimension of community vulnerability.
- 4. Existing SB 1000 environmental justice planning can provide useful local evidence:**
Jurisdictions may already have General Plan analyses that is grounded in State planning guidance, which identifies communities experiencing environmental injustice using finer-scale data, local socioeconomic information, additional hazard and vulnerability indicators, and community input. CalEPA could consider this existing work as supporting evidence through a supplemental pathway.

Because DAC designation is used to determine eligibility for and/or prioritize access to State funding, it is important that the designation methodology account for communities experiencing substantial disadvantage that may not be fully captured by a statewide screening tool. A supplemental pathway would provide that flexibility while complementing CalEPA's existing designation framework.

Thank you for the opportunity to share our comments. We appreciate your work and commitment to community engagement. If you have any questions, please contact the C/CAG Interim Executive Director Kaki Cheung at kccheung1@smcgov.org.

Sincerely,

Kaki Cheung, Interim Executive Director
City/County Association of Governments of San Mateo County