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California Environmental Protection Agency
Office of Environmental Health Hazard Assessment
DAC Designation Comments
Email: DACinquires@calepa.ca.gov

Re: Comments on the Preliminary Disadvantaged Communities Designation 2026

Dear CalEPA and OEHHA Staff,

We thank CalEPA and OEHHA for the opportunity to comment on the Preliminary 2026 Disadvantaged Communities (DAC) Designation. The Greenlining Institute (Greenlining) works towards a future where communities of color can build wealth, live in healthy places filled with economic opportunity, and are ready to meet the challenges posed by climate change. In our climate equity work, we conduct policy research, support campaigns and programs, and provide technical assistance to partner organizations, all of which heavily relies upon CalEnviroScreen and the at-present DAC designation in effect. After reviewing the preliminary designation and public comments raised during recent public workshops, Greenlining submits the following positions for consideration.

Principles

Greenlining strongly recommends the continued prioritization of the existing definitions aligned with SB 535 (De León, 2012) and AB 1550 (Gomez, 2016). These definitions were established to concentrate limited public dollars where need is the greatest. Expanding thresholds risks diluting benefits at a time where state funding is unprecedentedly constrained and inconsistent and would compromise the foundational intention behind this classification system.

The existing DAC designation captures communities that have experienced some of California's deepest and most persistent environmental and economic inequities, including disproportionately Black and Latino communities. Greenlining strongly supports preserving CalEnviroScreen's ability to direct resources to the communities facing the greatest cumulative burdens and cautions against expanding the threshold in ways that dilute already limited funding.

These disparities did not emerge by chance. Policies and practices such as redlining, discriminatory land use, urban renewal, and infrastructure siting shaped where pollution and environmental hazards were concentrated and where communities were denied access to investment and economic opportunity. The geography of today's disadvantaged communities

continues to closely reflect that legacy. CalEnviroScreen’s existing indicators help identify the places where those historic patterns have produced enduring environmental, health, and economic consequences.

Addressing those consequences requires investments that are similarly targeted. CalEnviroScreen remains one of California’s most important tools for identifying communities experiencing the greatest cumulative impacts and ensuring that public resources reach the places where need is most concentrated. Any update to the tool should strengthen, rather than weaken, its ability to prioritize those communities.

Preserving the proposed threshold

Greenlining acknowledges the fact that there are communities currently excluded from the existing thresholds which could benefit from accessing DAC status designation and funding. We are aware that some stakeholders in recent workshops have proposed raising the overall CalEnviroScreen threshold to 30-35%. We respectfully question this expansion as there continues to be investment and benefit gaps within the existing designations.

The statutory minimums from SB 535 and AB 1550 require that at least 25% of the proceeds from the Greenhouse Gas Reduction Fund (GGRF)--the State’s most significant dedicated source of climate investments--go to projects benefitting DACs and 10% go to low-income communities. The California Climate Investments (CCI) track record from a joint report with [Greenlining and the USC Equity Research Institute](#) highlights that 76% of \$9.2 billion total implemented California Climate Investment dollars (approximately \$6.7 billion) have benefited Priority Populations¹. Of this total, over \$4.2 billion (almost 47%) has gone to DACs specifically. Even though we are tracking in the right direction, The [American Lung Association 2026 State of the Air Report](#) highlights that more than 8 in 10 Californians continue to live in counties impacted by unhealthy levels of ozone or particle pollution.

Given that public dollars are finite, inconsistently appropriated, and subject to legislative annual budgeting, raising the inclusion threshold spreads a fixed pool thinner across more tracts, reducing per-community benefit to the highest-need areas. Per the July 2026 Preliminary Designation of Disadvantaged Communities, an “overly broad threshold would dilute the impact of SB 535” and risks “spreading designated funding too thinly.” Even under current, relatively strict definitions, community stakeholders report not feeling the benefits of CCI investments and being largely unaware of funded projects², suggesting current dollars are already insufficient relative to need, even before any threshold expansion.

¹ <https://www.caclimateinvestments.ca.gov/priority-populations>

²

<https://greenlining.org/publications/a-call-to-invest-in-community-power-lessons-from-10-years-of-california-climate-investments-for-the-state-and-the-nation/>

Addressing Measurement and Data gaps

We agree with addressing measurement gaps as the solution over threshold adjustment, which would cast too wide a net and capture less-burdened communities. Specifically, focusing on issues or areas where CalEnviroScreen fails to capture “felt” burden and impact, such as in dense urban tracts, which can be resolved via stronger methodology and application.

As several Bay Area caucus organizations have identified³ that several census tracts will be knocked out, which were previously part of the draft, reducing the number of Bay Area census tracts that could be eligible for funding. We request that this be further analyzed to determine why they were knocked out and explore additional ways to see if they can be reinstated without a straight threshold adjustment.

In addition, another CalEnviroScreen gap is that it does not account for relevant need indicators, such as indoor air quality⁴, homelessness, or radioactive health pollutants, all of which affect overall respiratory illness rates or other health outcomes. Thus, we recommend continuous incorporation of new indicators in future CalEnviroScreen iterations, consistent with the process already applied to add small air toxic sites and diabetes prevalence.

Greenlining also acknowledges and uplifts discussions concerning gentrification, where increased income and education statistics efface displacement and greater need. We maintain that, at the moment, it should not be addressed by an expanded DAC definition, which could have the perverse effect of benefiting communities that are not facing imminent gentrification pressures. Prospecting a separate, narrowly tailored indicator for displacement risk, gentrification pressure, or social vulnerability could mitigate the inequitable outcomes of the current process.

Outstanding questions

In the process of developing and finalizing the DAC designation, Greenlining offers the following questions for CalEPA’s consideration and to be answered in the public process:

1. What is the anticipated per-tract or per-capita funding impact if the threshold were raised to 30-35%? How would this affect currently designated top-quartile communities?
2. What total percentage of the State’s population is represented under the CES 4.0 DAC designation, and to what degree will this change based on an increased threshold to 30-35% of CES 5.0?
3. How will CalEPA reconcile calls to raise the threshold with the stated goal (in the preliminary designation itself) of avoiding dilution?

³ <https://calmatters.org/environment/2026/08/calenviroscreen-san-francisco-disadvantaged-communities/>

⁴ *Id.*

4. What is the process and timeline for incorporating new indicators (e.g., indoor air quality, homelessness, radioactive pollutants) into future CalEnviroScreen versions? Can interim supplemental review be offered to specific tracts in the meantime?
5. What is the finalization timeline for the 2026 DAC designation, and what opportunities remain for follow-up engagement?

We appreciate the opportunity to comment on the 2026 preliminary DAC designation and again re-affirm support for science-based, need-concentrated DAC designation. We look forward to continued tracking and engagement on this effort, and welcome any further discussion, conversation, or questions on any of the comments provided; please do not hesitate to reach out. Thank you for your consideration.

Best regards,
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