METROPOLITAN
TRANSPORTATION
COMMISSION

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The Honorable Yana Garcia, Secretary
California Environmental Protection Agency (CalEPA)
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Kristina Thayer, Ph.D., Director
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Dear Secretary Garcia and Director Thayer:

On behalf of the Metropolitan Transportation Commission (MTC), I am writing in response to the proposed Version 5.0 update of the CalEnviroScreen (CES) tool developed by OEHHA to help CalEPA identify communities disproportionately burdened by multiple sources of pollution and population characteristics that compound pollution-related risks. Updates to CES are of particular interest because the tool determines eligibility for key state funding programs, including those supported by the Greenhouse Gas Reduction Fund.

MTC appreciates the addition of the two new indicators in CES 5.0 and OEHHA's continued efforts to keep the tool current. However, these updates do not address our longstanding concern regarding the use of the composite CES score as the definition of disadvantaged communities (DACs). In high-cost regions like the Bay Area, cumulative disadvantage is driven as much—if not more—by housing instability, rent burden, overcrowding, displacement pressure, linguistic isolation, and transportation cost burden as by pollution exposure. Yet CES 5.0 continues to weight pollution burden far more heavily than population characteristics, causing the composite score to under-represent communities where socioeconomic pressure is the primary driver of vulnerability.

Loss of Key Bay Area Communities

Under MTC's Equity Priority Communities (EPC) framework—which identifies disadvantaged communities using eight demographic indicators including poverty, rent burden, low educational attainment, linguistic isolation, people of color, seniors, people with disabilities, and zero-vehicle households—441 census tracts across the region qualify as disadvantaged.

In contrast, only 122 tracts qualify under CES 5.0. The EPC framework captures the socioeconomic realities that shape vulnerability in a high-cost region, where displacement pressure, housing instability, and limited access to opportunity are central drivers of cumulative disadvantage. These conditions remain persistent in EPC-identified communities and align closely with the equity and mobility outcomes MTC is required to assess through its long-range planning work.

The transition from CES 4.0 to CES 5.0 resulted in the Bay Area losing several long-recognized disadvantaged communities—not because underlying conditions improved, but because of methodological changes to the CES tool. Communities such as East Palo Alto, West Oakland, Richmond, San Pablo, Pittsburg, and southeastern San Francisco qualified as DACs under CES 4.0 yet fall below the DAC threshold in CES 5.0 despite continued high socioeconomic vulnerability and largely unchanged pollution burdens. These communities have tracts that remain EPCs due to persistent poverty rates, high rent burden, linguistic isolation, and limited access to transit and economic opportunity.

In many cases, CES percentile scores declined by 20 points or more, driven not by demographic shifts or environmental improvements but by statewide re-ranking, the heavier weighting of pollution burden relative to population characteristics, and normalization against regions with significantly higher pollution concentrations. These methodological choices—not changes in community need—explain the loss of Bay Area DACs.

A statewide comparison further underscores this imbalance: although the Southern California Association of Governments (SCAG) region contains roughly 69% of CES-identified DAC tracts, the Bay Area contains only 5.4%, despite accounting for nearly one-fifth of California's population and a significant share of the state's low-income households. Indeed, a census tract outside the Bay Area is more than four times as likely to be designated a DAC as one within the region. These outcomes reflect the structure of the CES composite score far more than they reflect actual differences in community vulnerability.

Funding Implications for High Need Communities in the Bay Area

CalEnviroScreen plays a determinative or heavily weighted role in major state climate investment programs—including Affordable Housing and Sustainable Communities (AHSC), Transformative Climate Communities (TCC), Low Carbon Transit Operations Program (LCTOP), Active Transportation Program (ATP), and Transit Intercity Rail Capital Program (TIRCP)—where DAC status shapes eligibility, competitive scoring, and statutory benefit requirements. In the Bay Area alone, as of November 2024, approximately $2.26 billion in implemented California Climate Investment funds have been directed to projects benefiting "priority populations" (including CES identified DACs), representing 72% of the region's total $3.15 billion in state climate support. This underscores how essential accurate DAC identification is for ensuring equitable regional access to state resources.

Given the importance of DAC status in competing for state funds, communities that lose DAC status under CES 5.0 risk becoming newly ineligible or significantly less competitive for climate, housing, and transportation investments—even when socioeconomic need remains high. This presents real implications for equity focused planning and investment in the region.

Recommendation for a More Inclusive Definition of Disadvantaged Communities

To more accurately and equitably identify disadvantaged communities statewide, MTC urges CalEPA to adopt a dual-path designation framework that allows census tracts to qualify as disadvantaged through either the CalEnviroScreen composite score or the population characteristics percentile score at the 75% threshold. This approach is consistent with CalEPA's authority under Health and Safety Code §39711 and directly addresses the structural limitations of the CES weighting methodology—which underrepresents disadvantage in high-cost regions where vulnerability is driven by housing instability, rent burden, displacement pressure, linguistic isolation, and transportation cost burden—without requiring changes to the CES tool itself. By establishing a parallel, population-based pathway, CalEPA can ensure that communities with demonstrated socioeconomic need remain eligible for critical state investments, uphold the intent of California's climate and equity programs, and more accurately reflect the diversity of vulnerability drivers across the state.

Thank you for the opportunity to comment on the CalEnviroScreen 5.0 update. If you have any questions, please contact Kearey Smith, Director of Data Strategy and Analytics, at ksmith@bayareametro.gov.

Sincerely,

Andrew B. Fremier
Executive Director