

**COMMENTS BY THE COUNTY OF CONTRA COSTA
ON DRAFT CalEnviroScreen 5.0**

April 1, 2026

Thank you for the opportunity to comment on the draft CalEnviroScreen (CES) version 5.0. CalEnviroScreen has become an integral planning and resource allocation tool; we appreciate the effort to ensure it is regularly updated.

Given the importance of CalEnviroScreen, Contra Costa County (County) conducted a preliminary analysis and has some concerns about the draft CES version 5.0. Many of the underlying concerns originated because the proposed CES 5.0 does not match local knowledge on the ground. Some of the County’s most historically disadvantaged communities are no longer in the top 25% of CalEnviroScreen scores, while others that are not especially disadvantaged are now categorized within the top 25% of CalEnviroScreen scores. Communities such as Bay Point and the mobile home park in Pacheco are no longer in the top 25% while communities like East Richmond Heights have a Draft CES 5.0 in the top 25%.

Concern about Data Input Metrics

One reason for the change in final CES scores may be due to underlying data inconsistencies and variation between versions. For example, in the Bay Point community there appears to be significant variation in the hazardous material points between CES 4.0 and Draft CES 5.0, with an increased number of hazardous material sites identified as private residences, and removal of known facilities, including Henkel Aerospace, Shell Catalysts, and the Keller Canyon landfill. A more in-depth analysis would be required to see if there are additional inconsistencies in the data. See Attachment 1 for a comparison map of Hazardous Materials sites in Bay Point in CalEnviroScreen 4.0 vs 5.0. The following table provides a review of some of the many factors in the Bay Point community and indicators that match local knowledge about the Bay Point population.

Census Tract	CES 4.0	CES 5.0	Key Factors for change	Why still Disadvantaged
6013314103	75.2	72.92	Extreme swings (68.84%) from CES 4.0 - Draft 5.0 for Hazardous Waste impacts. Uncertain why there is a 33% drop in unemployment rate or a 26.4% drop in housing burden.	This area is in the 96th percentile for asthma, has a linguistic isolation score of 85.56% and a poverty score of 76.8% with a toxic release score at 89.64%

Census Tract	CES 4.0	CES 5.0	Key Factors for change	Why still Disadvantaged
6013314200	83.75	73.2	Significant swings (-20.99%) from CES 4.0 - Draft 5.0 for Hazardous Waste impacts; Significant shifts in low birth weight (-20.90%) extreme shifts (-39.85%) in linguistic isolation despite similar demographic characteristics.	Still has a very high poverty rate (83.09%), unemployment rate (93.38%), and housing burden (84.3%) with higher than average pollution impacts with high percentile for cleanups (81.75%) and lead exposure (77%)
6013315000	75.59	65.52	Extreme swings (56.56%) from CES 4.0 - Draft 5.0 for Hazardous Waste impacts as well as housing burden (-55.88%).	Still has a very asthma rate (93%) and unemployment rate (85%) while being in the top percentile for clean up (92%), ground water threats (92.7%), and traffic impacts 85.2%

Significant Data Swings between Versions

Another concern about CES 5.0 is some of the criteria percentages experience a swing of over 20%, and often over 50%, between CES versions 4.0 and 5.0. These swings may be due to small sample size, changes in methodology, or other factors. Some criteria had a greater instance of large swings such as cleanups, hazardous waste facilities, low birth weight, unemployment rate, and housing burden. A census tract in Vine Hill went from the bottom 21.11% in unemployment to the top 82.74% - a change of nearly 62%. Another census tract went from the top 80% for hazardous waste to just bottom 1.89%, with very little change in the surrounding community. While some change due to data reliability is understandable, when specific factors experience such extreme swings, it brings into question the reliability of the criteria used for analysis.

Low birth weight is one example of a criterion with significant swings between CES versions. This is likely because the population measured is so small that minor changes can cause significant swings in the data. In California, the median population size for a census tract is about 4,500 people. The statewide birth rate is estimated to be 4.2 births per 1,000 people, meaning the

average number of births per year in a typical census tract is 19 births. A census tract in the top 99% has a low birth rate of 10.53%, or 2 low-weight births per year. This means that even over a multiyear period one or two births can swing a census tract's population ranking from a low percentile to a high percentile. The swing may be due to actual births, or it could be due to geocoding errors or other data inaccuracies. While it is known that environmental pollution is a factor in low-birth weights and infants with lower birth rates are more susceptible to environmental impacts, there are other factors that may impact the birth weight of an infant that are not related to the environment. Data errors and multicausal low birth weight factor coupled with the small sample size of "infants born in a census tract over the past 4-5 years" results in unreliable measures of community impact. Weighing a criterion with so much variability with the same weight as poverty rate or other factors where the entire census tract population can be impacted creates swings in the population score that may not be related to environmental justice issues.

Balancing CES Methodology Updates with Local Planning Efforts

CalEnviroScreen has evolved into a cornerstone for not only California policy and funding implementation, but also for local planning efforts. The County's [General Plan](#) and [Climate Action and Adaptation Plan](#) include policies focused on environmental justice, as required by both Senate Bill 1000 and the County's Board of Supervisors. Both documents rely on the CalEnviroScreen designation to identify Impacted Communities in Contra Costa County. Revising the *General Plan* to reflect updated CalEnviroScreen designations is anticipated, however when the new designations conflict with local knowledge this creates challenges with our priorities to correct historic injustices, and credibility challenges in community.

Given that the model attempts to quantify local impacts using a large scale, there are communities that continue to experience the same impacts between CES versions yet move in and out of the Disadvantaged Community designation. Thus, local planning efforts and project funding anticipation diverge from State policy and funding opportunities. Please consider integrating these transitionally disadvantaged communities into the analysis by either capitalizing on previous CES analysis as a factor in each iteration or creating a designation for transitional communities.

Updating Statewide Climate Funding Methodology

As noted above, one of the ways the state uses the CES "disadvantaged" designation is to determine eligibility for funding. This leads to a situation where neighboring communities are often competing against each other for limited funds, and many communities are not eligible at all. The state could consider a different method of allocating funding that would increase participation and accelerate progress toward statewide climate goals by simplifying access to funding.

According to the [California Climate Investments Programs web site](#), "Across California, 117 California Climate Investments programs administered by 27 State agencies are continuing to direct billions of dollars into our State's transition to a low-carbon and more equitable future." It is a stretch for a local government to track these grant opportunities, provide comments on draft guidelines, and then determine whether to apply for competitive grants. Before applying for a grant, the local government has to weigh the time and resources needed to develop the grant application against the likelihood of receiving the grant award. This automatically limits the pool

of participating applicants, often leaving out those who do not have the staff and/or resources to develop grant applications.

The State could consider using flexible block grants, rather than a competitive grant process, for local governments that demonstrate how funds will be used to meet State-identified criteria. The State could take the list of California Climate Investment programs and use it as a menu from which local governments could choose to spend their funds. The State could use allocation formulas that provide relatively more funding for communities that are disadvantaged. The formulas could also incentivize other beneficial approaches such as building broad public and private coalitions, designing implementation projects that expand high wage job opportunities suitable for local residents, or joint initiatives by neighboring jurisdictions to create projects with regional reach and significance. This would allow more communities across the state to benefit from the California Climate Investments Programs while still achieving state goals. And it would free up state agency staff to focus on program administration, development, and implementation, rather than writing grant guidelines and conducting bid processes.

This model has been successfully implemented in the past, including grants for Proposition 39 school energy efficiency projects and the Ocean Protection Council's Senate Bill 1 Grant Program. Hallmarks of these programs include rolling quarterly submissions and intergovernmental collaboration, which enable jurisdictions to apply when they are ready and able to implement these priorities.

Climate Change Criteria in CES 6.0

Finally, as the CES methodology evolves, Contra Costa County hopes the Office of Environmental Health Hazard Assessment continues to engage with local leaders. Climate change will increasingly impact communities throughout the state, especially those that are most vulnerable. As CalEPA develops a strategy for integrating climate data for use in CES 6.0, Contra Costa County supports the integration of climate data in CES 6.0 as a collaborative effort to ensure climate action and resiliency continue to be a priority for the State while reflecting local community impacts.

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