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Honorable Board of Supervisors, and esteemed Planning Commissioners,

We appreciate the work and progress made in the Housing Element update. Thank you for taking the time to consider our comments. The County did a good job of collecting feedback from every community. While we think the County can and must go further, the County is planning for more housing than it ever has, in the face of intense political pressure, and we appreciate the proposals to rezone high-opportunity areas, such as those for Cherry Lane, Kingston Place, and at Mauzy School. We also thank you for acknowledging SB 330 relocation and return rules.

We appreciate the work to get the county into compliance with all of the new state laws, and, we have a few comments that can strengthen the work to produce more resilient and vibrant communities.

Summary

- Programs should contain **clear goals**, and should be **stronger with respect to solar, VMT, climate mitigation, and ventilation**.

- The County is **including sites that are infeasible** or undesirable, including one site in **wetlands** on "the wrong side of the tracks," as well as double counting RHNA units on some parcels.
- Sites Inventory **disproportionately plans housing in lower income communities** with higher levels of pollution and nonwhite residents, which do not share schools/hospitals/parks with higher resource communities. We suggest several tests, programs, and sites to help Further Fair Housing.

Program and Actions

1. **Strengthen Program and action language and set clear, measurable goals with dates.** In HCD's multiple determination letters to other jurisdictions it was noted this type of language was deemed insufficient. "Programs containing unclear language (e.g., "consider"; "review", "conduct a study to assess" "create a plan", "evaluate impacts" etc.) should be amended to include specific and measurable actions that will lead to actual housing outcomes",¹ and should instead be replaced with language that relates to actual concrete goals, for example, the production of low-income housing, or reduction of housing costs below some target number.
 - a. Example: By X year, require the planting of street trees throughout the County to define and enhance the character of the street and the adjacent development.
OR Plant X number of street trees (~25% increase) in the sidewalk tree wells to complete the street tree network by 2040. See the [Resilience Playbook](#) for more information.
2. **Add stronger language to reduce VMT.** Policies that support VMT reduction include lowering parking minimum requirements, switching to parking maximums, promoting bike and pedestrian travel.
3. The County should add a program to **permit ministerial approval of fourplexes** in single family zones, within the same building envelope used for single family home approvals.
4. The County has historically not been in compliance with the requirements of Assembly Bill 2188 (Muratsuchi, 2014). In particular, AB2188 requires the County to "substantially

¹ From HCD's determination letter to Lafayette,
<https://eastbayforeveryone.org/wp-content/uploads/2022/09/2022-09-30-lafayette-hcd-determination.pdf>

conform” its permitting process for small **residential rooftop solar energy systems** with the California Solar Permitting Guidebook (CSPG). The CSPG in turn requires “a maximum timeframe of 1-3 days in which to review (qualifying) permit(s)”. In violation of this requirement, Contra Costa County’s municipal code (Section 718-12.004), and actual permitting practices, improperly involve a lengthy completeness process. We look forward to the County complying with the newly-passed SB379, which requires implementation of real-time issuance of such permits no later than September 30, 2023.

5. **Create a public data and milestone portal** to track Housing Element progress for accountability and clear interim update report dates to the Board of Supervisors.
6. Pilot a **reduction of fees for subsidized affordable housing**, and/or tiny/smaller units that are designed to be affordable. Most connection fees and other fees for development are based on unit count, which drives up costs for smaller units close to those of single family homes.
7. In addition to piloting fee reductions and removals, the County should set funding goals and **aggressively pursue additional funding sources for Community Land Trusts**, affordable housing, and social housing organizations through ballot measures, enhanced infrastructure districts, or any other tool available.
8. **HE-P8.2:** Should include: Develop and execute plans for retrofitting existing buildings to all electric energy use, reducing health risks from methane/natural gas, to be accomplished by 2035.
 - a. Be proactive in regional program activity work including promoting solar in retrofits and supporting solar in all new residential development, per CA state law.
 - b. Extend the residential buildings solar mandate to multi-family buildings higher than 3 stories.
 - c. Provide incentives for new and existing residences to install battery storage by aggressively promoting existing rebates and incentives and seeking funding to augment and expand financial incentives for battery installation.
9. **HE-A8.2:** Please strengthen the language here by itemizing the climate actions and outcomes sought through the County’s interim climate action plan.
10. Many of the County's existing (and proposed; site 79) apartment buildings and schools are located close to freeways or refineries, which have higher levels of PM 2.5 pollution which in turn leads to higher levels of stress, asthma, obesity, and lower cognition. **Add a program to subsidize MERV 13 air filter installation**, and room-size air purifier

installation in existing apartments and schools in polluted areas, and do an education program about the benefits of ventilation and how to keep air clean. A study in Texas indicated mold remediation and ventilation investments improved student test scores by 3-4%.²

11. Racially Concentrated Areas of Affluence (RCAs) have seen a number of proposals to tear down an existing single family house and build a bigger house on the same property (recently, 132 Leona Court, 56 Sandra Court, 971 Danville Boulevard). The County could meet with applicants that are proposing these developments and ensure the developers are familiar with the options for adding additional units (ADU's, JADU's, SB 9 lot split) to these applications, as well as state law which requires stricter criteria for denial of "housing development projects" of more than one unit.

Constraints

1. We found only one bullet point about bike amenities. Please add higher standards for capacity bike parking to accommodate e-bikes, cargo bikes, and trikes in new developments to encourage biking for everyday needs. We also encourage starting a program to help older buildings renovate to add these amenities.
2. Current parking standards for the County require 2.25 spaces per 2 bedroom apartment and 1.75 spaces per one bedroom apartment. Parking spaces cost \$50-90k per space and as a result make housing that much less affordable. Especially combined with a 35 foot height limit, parking minimums require digging underground which is expensive and reduces the viability of ground floor retail. On the smaller lots in North Richmond, parking minimums will make projects completely infeasible.

In public comment, the County heard plenty of complaints about increased traffic – this traffic will only be made worse³ if every new 2-bedroom apartment comes with 2.25 cars. The County's parking standards are significantly higher than nearby communities (Lafayette requires only 1.2 spaces per one-bedroom, while Walnut Creek is committing to a reduction in its parking minimums). In addition to traffic, more cars means more pollution from rubber tire particulates and disc brakes, which in many areas of the

² Stafford, "Indoor air quality and academic performance," 2015, *Journal of Environmental Economics and Management*.

³ There is substantial research that the amenity of free off-street parking results in households purchasing more cars than if they did not have the space(s).

County is already exceeding safe thresholds.

Consider lowering parking minimums to 1 space per unit or consistent with state law.

Developers can always choose to exceed this amount of parking if they wish.

3. The element does not discuss the impact of community groups located in Racially Concentrated Areas of Affluence who oppose denser housing and the subsequent impact on land use, which has changed little in any of these areas in the past 30 years.
 - The Alamo Improvement Association was founded in 1955, when many homes in Alamo (which today is 82% White with median household income \$187,000) contained legally binding racial covenant language, and nine years *before* 65% of Californians voted to permit landlords and home sellers to racially discriminate against renters and buyers (Prop 14 of 1964). This group has historically opposed denser development in Alamo which contributed to the town hardly adding any new homes between 1980 and the present day. In August 2022 and November 2022, the AIA mailed a copy of the updated sites inventory to every resident of Alamo, pointing in particular to the parcels that were to be rezoned.
 - The Diablo Historic Preservation Committee attempted to exempt Diablo, another RCAA, from SB 9 duplex zoning rules through its status as a historic district. This proposal was indiscriminate and would have banned duplexes on Diablo parcels without any historic qualities whatsoever. At a Historic Landmarks Advisory Committee meeting, a Diablo resident and committee member stated his motivation for supporting the historic preservation measure was more about traffic and fire safety, which are not historic impacts.
 - a. The original BART plans proposed heavy rail along the I-680 corridor linking Walnut Creek to Pleasanton.⁴ The element should discuss the history of opposition to public transit along the 680 corridor and subsequent impacts on housing densities and frequency of public transit in Racially Concentrated Areas of Affluence including southern Walnut Creek, Alamo, Diablo, and Blackhawk.
4. The Land Use Control section on development standards states multi-family buildings are limited to 35 feet except in P-1 zones with Planning Commission approval. It also states the lot coverage “is typically limited to 25 percent.” The combination of a 3 story height limit & 25% lot coverage would place these standards out of compliance with SB 478 for 3-10 unit projects; the County should adjust standards to ensure consistency with SB

⁴See e.g. <https://i.redd.it/oug1l3nafa601.png>

478, and those new standards should also apply to developments >10 units. Please amend as appropriate to ensure densities can be achieved.

5. We're concerned about the size of setbacks required for multifamily development. The draft document does not describe the setbacks for the M-75 or M-125 zones. However, no multifamily setbacks are currently shorter than 20 feet and the M-29 setback is 25 feet.

Parcel 172040034 is in a High Resource area but is only 65 feet deep. With a 25 foot front setback and a 20 foot rear setback, this leaves only about 20 feet for the building envelope. This will make it difficult to develop this parcel.

Reduced front setbacks can decrease pedestrian travel times and increase the viability of ground floor retail. Reduced setbacks can also increase shade available on sidewalks, which is important when temperatures reach 100 degrees in the summer.

6. The discussion of constraints lacks an analysis of the County's compliance with the Permit Streamlining Act and CEQA laws and regulations. State law generally regulates housing approval in three interlocking phases - completeness, CEQA, and finally approval. As failure to follow these streamlining laws delays housing and denies developers the legal rights the state legislature intended the developers to have, any violations of these streamlining laws are an unreasonable constraint. Please amend the Housing Element to include an analysis of compliance with all PSA and CEQA laws including PSA completeness law, CEQA laws including PRC 21080.1, 21080.2, and 21151.5, and PSA approval law. If the County is not operating in compliance, the Housing Element should be amended to include program(s) for compliance with PSA and CEQA laws. The Housing Element should also explicitly acknowledge that PRC 21080.1 & 21080.2 require the issuance of CEQA-exemption determinations within 30 days of completeness, and that said determinations serve to trigger the PSA's 60-day deadline for approval of CEQA-exempt housing. This is an essential aspect of streamlining zoning-compliant urban infill.

Site Inventory

The County only provided APN parcel numbers in the sites inventory, which made it difficult to group parcels in the sites inventory by e.g. CDP, zip code, or site number, and make assertions, without manually retrieving each site from the County's parcel database and annotating them.

The County also does not provide information in the table about which parcel(s) correspond to numbered sites in the inventory.

Please add zip code, CDP designations, and numbered site information to Table A and Table B for site inventory.

Double counting on existing parcels

For parcels with existing housing, the County can only count the *additional* units toward its RHNA target; if a parcel has 11 homes and a developer proposes tearing them down to build 29, the County could count a net of 18 toward its RHNA allocation. It seems that the County is double counting in some instances:

- Site 18 claims a realistic capacity of 17 homes, on a site with 12 existing homes. Thus, site 18 can only contribute 5 homes towards RHNA, not the 17 homes listed in Table B.

Housing Authority Sites - apparent failure to qualify under 65583.1(c)(3)

- The Housing Element lists many sites owned by the Contra Costa County Housing Authority that presently include existing houses. The Housing Element appears not to be subtracting the count of existing homes on these properties from the claimed RHNA credit. These sites include at least Sites 14, 15, 29, 30, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 63, 65, 66, 67, 68, 69, 70, 71, 72, 73 74, 75, 76, and 77.
- The only apparent mechanism by which existing homes could be counted towards VLI/LI RHNA is via Gov. Code 65583.1(c). However, Gov. Code 65583.1(c) has numerous requirements not addressed by the Housing Element, including funding commitments. The Housing Element should be amended to clearly establish the legal basis for counting the existing homes, or should instead withdraw the sites if the requirements cannot be met.
 - It is noted that Gov. Code 65583.1(c)(3) precludes use of 65583.1(c) by any jurisdiction that failed to meet its share of the regional need for very-low and low-income households during the immediately prior planning period. As Contra Costa County appears not to have met both its VLI and LI RHNA minimums in the immediately prior planning period (CCC is subject to SB-35 for example), it appears that (c)(3) has been triggered and use of 65583.1(c) is barred by Contra Costa County in the present planning period.

Sites that should be removed

1. Site 78 is, quite literally, "on the wrong side of the tracks." There are no amenities in walking distance and none planned. It is close to the Shell Catalyst heavy industry facility which is a source of air pollution. The site is currently wetlands which perform an important defense against flooding. This site should be removed from the Housing Element and the General Plan update.
2. Site 18 is home to 12 existing units. It will not pencil to replace them with 17 units deed-restricted to lower incomes, much less 30 parking spaces and relocation and return for existing tenants. To support redevelopment as well as relocation and return, these parcels should be given a higher density.
3. Sites 1, 2, 4, 5, 16, 17, 18, 19, 20, 24, 28, 31, 32, 33, 49, 50, 79, 80, 82, 85, 87, 88: These sites have active uses (on at least a portion of their area) and the Housing Element doesn't provide adequate evidence of intent from the owner(s) to cease such use and redevelop. The in-use areas of these sites should be removed if no strong evidence of intent to redevelop can be provided. For any sites relying on assemblage, evidence should be from all relevant owners with active uses. For sites with the same owner of adjacent parcels, evidence from that owner should indicate which parcel(s) are intended for development. The mere claim that sites are underutilized, even severely, is not sufficient evidence of likelihood of redevelopment, particularly given the low property tax rates paid by longtime property owners. To the extent housing is projected on existing off-street parking portions of parcels, it should be validated that the parking is not legally required for the parcels' existing use and that the users of the parking do not represent an impediment to removal of the parking.
4. Sites 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 88, 89, and 91: The Housing Element includes a claim that there is developer interest & an owner willing to sell OR includes a claim that the owner is interested in redevelopment. However, the actual evidence is not provided. Please provide the actual evidence.
5. Sites 23 and 42: Has the West Contra Costa Unified School District expressed interest in development? Please provide evidence.
6. Site 79 is listed as "vacant" but the description states it includes a Church Parking lot. Please revise to "non-vacant" and include appropriate evidence. The Housing Element's statement that "*A County Supervisor is interested in seeing this site developed with housing*" does not qualify as evidence of likelihood of redevelopment per HCD guidance.

7. Site 35: The Housing Element claims this site is vacant, but the included satellite imagery appears to show at least some commercial activity. Please clarify.
8. Sites 62 and 64: Each is a Housing Authority site with 1 home intended for very-low income RHNA. We do not believe single home VLI development is likely. Please provide evidence of a successful similar development.

Sites that need additional documentation

1. Parcel 184342008 - this parcel is described in the County's property tax database as "unbuildable" which is maybe due to the lack of street access. Does the County have a plan to enable access to this parcel?
2. Parcels 172040025, 172040026, 172040034, 172040036: These are owned by the County but they were not included in the April 2022 Notice of Surplus Land. The County should document how it plans to develop these parcels for dense housing, or document its plan to comply with the Surplus Land Act.

Sites we recommend rezoning for additional density

We believe these sites should be rezoned for 30 DUA as part of the Housing Element or the General Plan. It is possible that some of these sites are already included in the General Plan update; if so, we apologize.

If these sites have no development intent before 2031, but would result in a General Plan rezoning, they could still be included with some credit toward the Sites Inventory, but they must be at a significantly lower ratio to be realistic estimates. For example, if it is plausible that one out of fifteen "very unlikely" sites' owners is convinced to build by a new offer during the planning cycle, then each site could be counted toward the RHNA at 1/15th of its capacity.

1. *Single family zones* - Single family parcels should support the construction of a fourplex, especially when (e.g. in Alamo or Diablo) they are currently receiving many proposals to build one 5,000 square foot house. If a 5000 square foot house for one family is legal to build, it should also be legal to build four 1250 square foot homes.
2. Parking lot adjacent to Monte Vista High in Alamo, owned by SRVUSD, has about 4 vacant acres, 10 including the existing parking. SRVUSD could develop teacher housing on this lot, or sell it to fund ongoing operations, or issue a 99 year ground lease to fund ongoing operations.

3. 920 Stone Valley Road is a large vacant parcel that could support multifamily development.
4. Athenian School near Diablo, which has existing dormitories and teacher housing and may be interested in adding more.
5. 3180 and 4155 Walnut Blvd. in Walnut Creek are over two acres with a very low existing FAR. These would be an appropriate place for townhomes, which exist on other stretches of Walnut Blvd.
6. Single family home zone near La Casa Via in Walnut Creek.
7. In general, any residential infill parcel which is over 0.5 acres, has under 0.2 FAR, with structures onsite that are more than 40 years old, would be a good candidate for rezoning to townhome level density.
8. St Luke's Lutheran Church in Walnut Creek.
9. Vacant parcel between Ward Dr and Hillview Dr. in Walnut Creek.
10. Parcel 183-110-003 on Murwood Drive.
11. The large, mostly unimproved parcels along Shady Glen Rd. near San Miguel Dr.
12. All of the parcels surrounding Kensington Circus should be rezoned for mixed use with low parking minimums.
13. The commercial parcels along Arlington Ave in Kensington should be rezoned for mixed use with low parking minimums.
14. Unitarian Universalist Church in Kensington.

Fair housing

Contra Costa County's own charts indicate that the County is planning to put a disproportionate amount of the Sites Inventory in areas with:

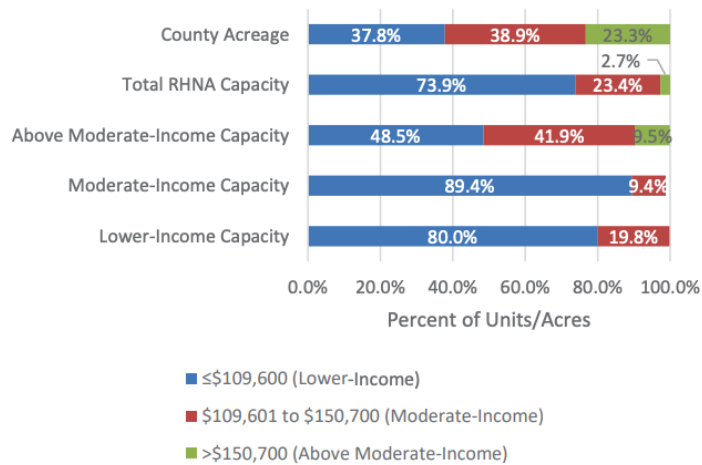
- higher numbers of low-income residents
- worse access to jobs
- more pollution
- more minorities

We reproduce these charts (pages ~100-110) here because they tell the story better than we can. It is possible these numbers look better when you include all parcels being rezoned for the

General Plan,⁵ and if so we would encourage the County to publish both charts for the Housing Element and for all parcels being rezoned in the General Plan.

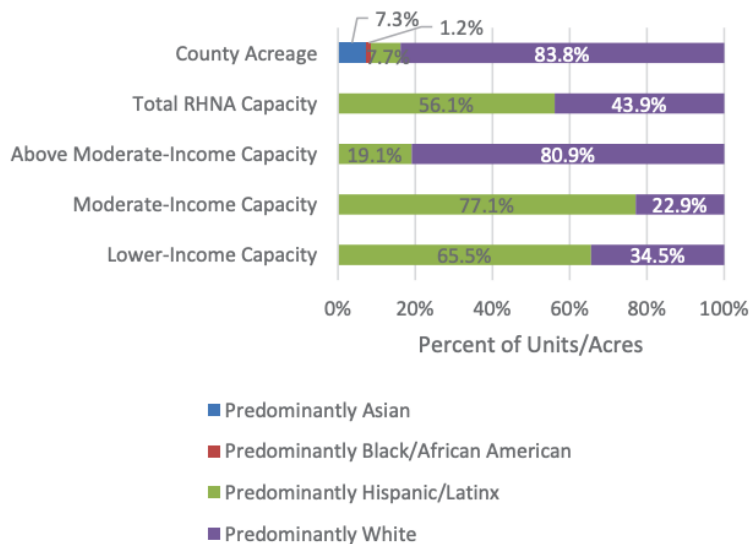
About a quarter of the County's land is home to residents making above \$150,000 per year, but only 2.7% of the Sites Inventory is planned for these areas.

FIGURE 6-17 PERCENTAGE OF UNIT CAPACITY AND COUNTY ACREAGE BY MEDIAN INCOME



⁵ For example, by including the increased capacity available on single family or missing middle parcels under the rezoning program.

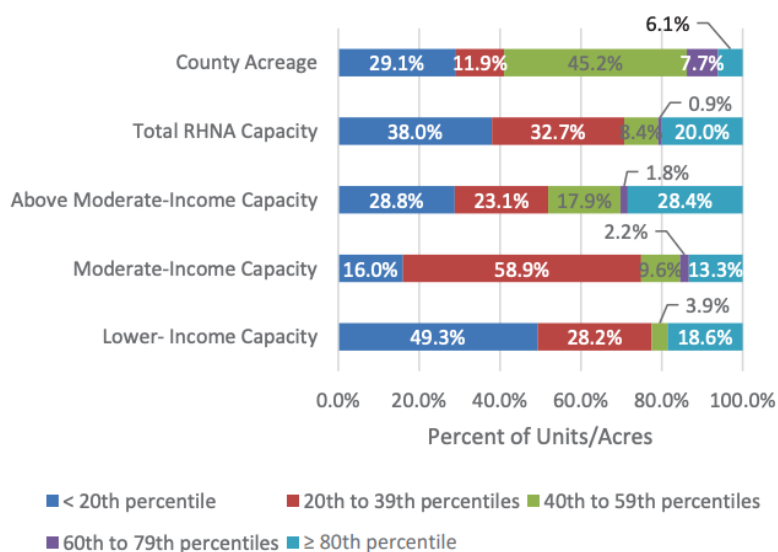
FIGURE 6-19 PERCENTAGE OF UNIT CAPACITY AND COUNTY ACREAGE BY PREDOMINANT POPULATION



Source: US Census, 2019; Contra Costa County Department of Conservation and Development, 2022

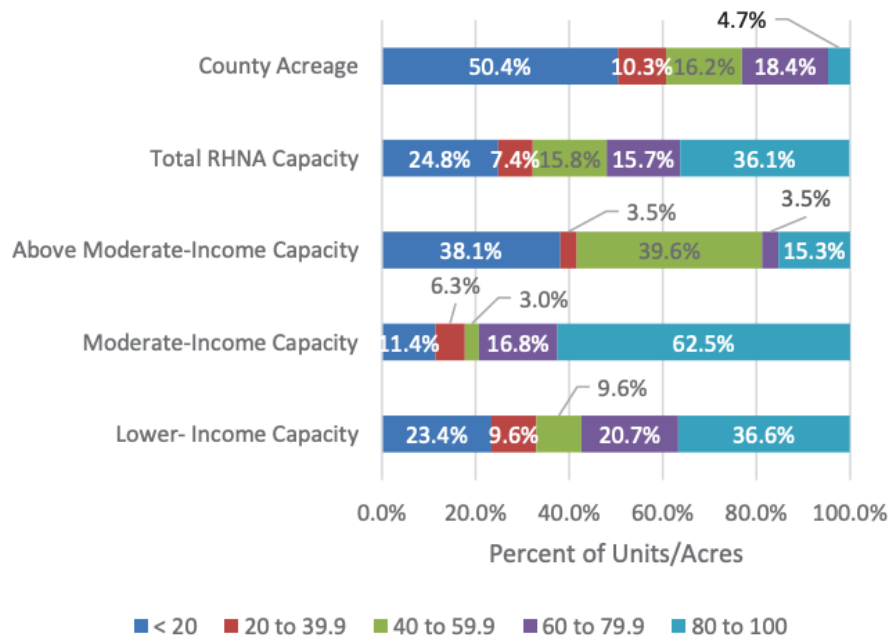
Almost half of the low income housing in the Sites Inventory is in areas that score in the 20th percentile or lower on job proximity.

FIGURE 6-22 PERCENTAGE OF UNIT CAPACITY AND COUNTY ACREAGE BY JOBS PROXIMITY INDEX SCORE



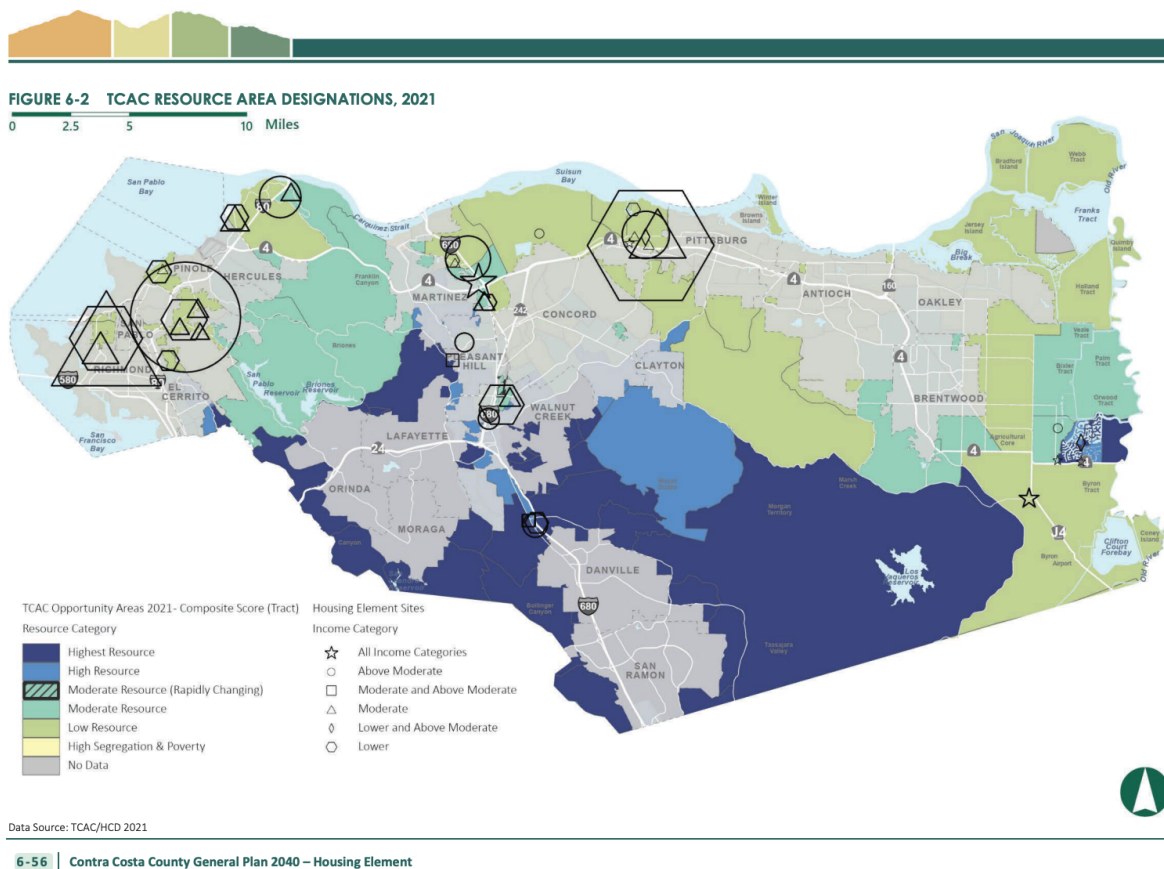
Less than 5% of the County's acreage is in the 80% percentile or higher on the environmental screening model, the most polluted areas in the entire state, but 36% of the total RHNA capacity is planned in these areas.

FIGURE 6-23 PERCENTAGE OF UNIT CAPACITY AND COUNTY ACREAGE BY CALENVIROSCREEN SCORE



Source: OEHHA, CalEPA, CalEnviroScreen 2021; Contra Costa County Department of Conservation and Development, 2022

Finally, this map shows how little of the sites inventory is planned in areas designated Highest Resource, which are the closest to San Francisco and the furthest from heavy industry. These areas also saw the smallest rezoning of single family home zones, from 2.9 DUA to 3 DUA.



This pattern of disproportionate allocation *may* be acceptable in a city where wealthy and less wealthy residents share the same amenities - schools, parks, hospitals, facilities, transit. In Contra Costa County they do not. Blackhawk is five school districts and 30 miles away from North Richmond.

It may help to flesh out these charts with specific examples.

1. Vine Hill/Mountain View are CDP's with about 7000 people sandwiched between two oil refineries and the 680 freeway. The sites inventory counts more units in Vine Hill and Mountain View (430) than it does in Alamo (16,500 people, \$187,000 AMI), which does not have any nearby refineries.
2. Kensington and East Richmond Heights are two CDP's close to each other in the Berkeley Hills. Kensington is a RCAA, wealthier than East Richmond Heights, closer to BART than East Richmond Heights, and has more area outside of the high severity fire

zone. Kensington has zero sites in the Sites Inventory, while East Richmond Heights has one. Half of single family parcels in Kensington are being downzoned (max intensity going from 7.2 to 7); all single family parcels in East Richmond Heights are being upzoned (max intensity going from 7.2 to 17). While some of this zoning change is meant to reflect existing parcel densities, this means redevelopment is now more feasible on some larger parcels in East Richmond Heights, where it was not previously (e.g. 6095 Ralston Ave), and still not possible on many in Kensington (e.g 48 Anson Way).

3. 255 North Bella Monte Ave. in Bay Point is a vacant half-acre parcel in a single family neighborhood that is about a mile from the Shell Catalyst heavy industry facility. The unemployment rate is high in Bay Point and the schools are not as good as elsewhere in the County. As part of the General Plan update, this parcel is being rezoned from 6 homes permitted⁶ to permitting 15 homes.

Recently, a half acre parcel in Alamo at 132 Leona Court, which is not polluted, abuts a bike trail, and is zoned for Blue Ribbon schools, was purchased for \$2 million. The buyer paid \$2 million to tear down the existing house and build exactly one house in its place, because the zoning on this parcel is not changing (1.45 homes permitted to 1.5 homes permitted).

4. The RHNA numbers assigned to Walnut Creek (5805), Danville (2241), and San Ramon (5111) suggest that if Alamo⁷ was incorporated, its RHNA target would be somewhere around 781-1255 homes.⁸ The County identifies just 351 new homes in Alamo in the Sites Inventory.
5. At a meeting of the Alamo MAC on December 6, 2022, County planning staff suggested that the Alamo mixed use zone in the General Plan may get an overlay lowering the permitted density from 75 DUA to 30 DUA. It is unlikely to us that lower resource areas of the County, or those closer to sources of pollution such as heavy industry, will receive similar overlays.

⁶ 11.9 DUA (5.95 half acre yield rounds up to 6, per County guidelines) under the "ML" zone to 30 DUA under the RMH zone. This is based on the most recent draft land use maps available from envisioncontracosta2040.org; these maps may be out of date.

⁷ We focus on Alamo because it's the largest Racially Concentrated Area of Affluence that has a contiguous downtown and is not in a fire zone.

⁸ Dividing each city's allocation by its current population and then multiplying through to get an estimate for Alamo.

6. A disproportionate number of sites being rezoned for M-125, the County's highest intensity zoning designation, are in lower income, "environmental justice" areas.⁹

Suggestions for Fair Housing

We understand that constraints related to property owners (Alamo Plaza), as well as the difficulty of calculating yield for single family parcels, may make these targets difficult to hit in the Housing Element, and would be satisfied if the County could demonstrate compliance with targets 4 and 5 either in its General Plan, or in the Housing Element.

1. Adjust the minimum DUA for all infill single family parcels throughout the County to 7. We would be open to counting these rezoned parcels toward the RHNA, using an expected yield formula of the County's choice.
2. Create a program to permit ministerial approval of fourplexes on all parcels within the same building envelope/setback rules etc that currently apply to single family homes.
3. If #2 is not feasible, permit ministerial approval of sixplexes - with one unit designated affordable - on all parcels that contain a racial covenant in the CC&R's.¹⁰
4. Mixed use densities in RCAA's/areas under 20 on EnviroScreen should be equal or greater than mixed use densities outside of these areas (ie. no downzone overlay in wealthy areas).
5. In terms of increased capacity available on each parcel, the single family zones in RCAA's should get at least as much new capacity, proportionate to their share of the population, as the single family zones in other areas.
6. See sites suggestions in the Sites Inventory; in general, we think sites in RCAA's that are larger than half an acre, with less than 0.2 FAR, especially along bike trails or close to amenities, are appropriate sites for at least townhome density development.

Finally, we included these suggestions in Programs and Policies as well.

⁹ We could put exact numbers on this if the County could amend table A and table B to include zip code or CDP information.

¹⁰ While no centralized database exists of racial covenants, this would not be necessary, since it would be easy enough to verify at application time that the CC&R's for the parcel in question contain a covenant.

7. Add a program to mitigate air quality issues in existing apartments and schools near freeways or heavy industry by improving indoor ventilation and subsidizing air purifier purchases.
8. Meet with applicants proposing same-density replacement of housing to suggest ways to increase unit count (ADU, JADU, lot split, duplex).

Conclusion

We look forward to continuing to engage with the County and HCD throughout the 6th Cycle RHNA process.

Sincerely,

Victor Flores

Greenbelt Alliance

Benisa Berry

East County Community Leaders Network

Sue Bock

San Ramon Valley Climate Coalition

Kevin Burke

East Bay for Everyone

Marti Roach

350 Contra Costa

Lynda Deschambault

Contra Costa County Climate Leaders
(4CL)

Hayley Currier

Save the Bay

Rev. Sophia DeWitt

East Bay Housing Organization

Tyler Snortum-Phelps

Sustainable Contra Costa