

HMC comments and questions on the October 2, 2020 Placeworks memo on proposed Environmental Justice Goals, policies and actions in the update to the Contra Costa County General Plan – 11/20/2020

Goal A

P&P – Overall question – Did DCD reach out to the business community to discuss these proposals?

Ops Policy 6 and Action 7 should be reversed

P&P Policy 3 – better define the terms “early and significant”

P&P Policy 4 – need to establish a specific timeline for this phaseout

P&P Policy 4 – there are other industry types that present hazards, should there be specific policies for them?

P&P Policy 4 and 5 – should also require that the economic impacts and consequences of implementing these policies be analyzed.

P&P Policy 5 – need to define “major development project”

P&P Policy 6 – Is “prioritizing” enough to ensure that equity is achieved, or do quantifiable endpoints need to be established to ensure equity?

P&P Action 1 – DTSC needs to be coordinated with for phase out and site remediation

P&P Action 2 – Is significant impact only determined by CEQA, or can Health Impact Analyzes also be used?

Goal C

Ops - Possible new Policy – Homes potentially impacted by chemical fires or releases that may need to shelter-in-place need to be able to do so safely, with adequate infiltration rates and protection from heat. These concepts can also be incorporated into Policies C-4 and C-5.

Ops - Possible new Policy – Support continued public education to make sure all residents are provided adequate education about less toxic alternatives to household hazardous products, including pesticides, and education about the safe handling, storage and disposal of Household hazardous Waste, including pharmaceuticals. Ensure there are adequate options for HHW disposal for residents that don't drive.

Goal E

Ops - Concerned about the use of the word “equal” in goal. Is this really possible?

Goal F

Ops Action F-4 – make sure the criteria established considers the type of hazmat being transported and the air pollution from the trucks.

Goal J

Ops Policy J-3 Possible new policy – more specificity for how far away sensitive receptors need to be from sources to be safe, and be clear that they shouldn't be placed within that zone.

Goal K – define “resilient” better – Need policies and actions that address resiliency

Ops Possible new policy – Ensure residents and businesses that live near hazards are adequately educated about the risks from near-by hazardous materials and have adequate ways to protect themselves.

Ops – Policy K-1 – What is the definition of “large scale hazardous waste facility” Is this a TSD facility or a facility that generates a large amount of hazwaste.

Ops Policy K-2 – replace “advocate for ” with Coordinate with agencies to equitably remediate

Ops Possible new policy - require setbacks of pipelines, rail lines, oil & gas drilling from healthcare, schools, residences, senior & child care, etc., & setback of those new receptor development from those industrial facilities as well as other facilities using hazardous materials

Ops Possible new policy - safe clean up, not cover up of contaminated sites to be developed for sensitive receptor uses. (no cleanup with deed restrictions)

Ops Possible new policy - No development of cleaned up contaminated sites which have not passed current 5-year reviews

Ops Possible new policy - no development of sites in violation of existing land use covenants imposed by DTSC or the Regional Water Quality Control Board.

P&P Action K-1 – County does not have a Brownfield Cleanup policy. Be specific about what type of partnerships to establish with EJ groups, what would be their role (only jurisdictions can apply for grant funding.)

P&P, Possible new policy – If not already required by ISO or other regs, require facilities to demonstrate that they have adequate capacity or access to equipment and personnel to put out fires at their facility.

Climate Equity

Ops – new policy - no new facilities using or storing hazardous materials to be sited in areas impacted by projected sea level rise without adequate preplanning for that eventuality.