

MEMORANDUM

Date: March 10, 2021

To: DCD, Placeworks

From: Contra Costa Health Services

Subject: Comments on the Discussion Draft Goals, Policies and Actions on Environment Justice for the General Plan

Thank you for the opportunity to review the discussion draft of the Environmental Justice sections of the general plan. Contra Costa Health Services is pleased to provide comments that we believe will enhance the final document.

We want to acknowledge the following individuals for contributing to this document: Erika Jensen, Dan Peddycord, Rohan Radhakrishna, Gilbert Salinas, Michael Kent, Luz Gomez, Cedrita Claiborne, Beth Armentano, Tiombe Mashama, Ameerah Thomas, Susan Psara, Steve Marioka, Kristian Lucas, Suzanne Tavano, Jamie Jenett, Matt Kaufmann, Ellen Dempsey and Cho Nai Cheung.

We have organized our comments in three sections. First, we identify the major health and equity concepts that we would like to see reflected throughout the new General Plan. Next, we highlight key health ideas or concepts that we would like to see reflected in each goal. Last, we provide more detailed proposed language for policies and actions and a brief discussion of how other jurisdictions are including metrics in complying with SB 1000.

Major Health and Equity concepts we would like to see:

1. Incorporate a racial justice lens and use racial justice language. Acknowledge environmental racism.
2. When introducing the concept that health principles are woven throughout the General Plan, mention the [Social Determinants of Health](#), the [Healthy People 2030 Goals](#), and how they fit nicely with the County's approach in this update.
3. We urge the County, as it implements the new General Plan, to require training of all staff on environmental justice and racial equity principles, as well as implicit bias and cultural humility.
4. As a policy, Contra Costa should conduct Health Impact Assessments (HIA) and involve Public Health when land use changes and major infrastructure projects are proposed. See [this guide](#) on HIAs.
5. In determining which communities are considered "disadvantaged," include racial composition of the communities along with other factors. CalEnviroScreen 3.0 does not include indicators of race/ethnicity in its data layers. Use California [Healthy Places Index](#) (HPI) in conjunction with CalEnviroScreen 3.0 to more accurately describe "Disadvantaged Communities." HPI includes racial segregation as a data layer. Racial segregation can starve communities of color of resources, political power, and other resources necessary for health.
6. Incorporate power-sharing strategies when engaging and involving communities.
7. Consider not allowing new projects with unavoidable significant environmental impacts in disadvantaged communities.

8. For all goals, conduct an initial or baseline assessments to determine if current programs are being implemented or current conditions are equitable and to determine progress with goals over time.
9. Identify appropriate indicators or metrics and timeframes to measure success for each goal.
10. Instead of simply prioritizing spending, programs, or efforts in disadvantaged communities (DCs), make goals, policies and actions commit to achieve equitable outcomes in those areas over time.
11. Ensure that discretionary funds are prioritized to address inequities in disadvantaged communities first. Work to increase discretionary funding streams.

SB 1000 provides an opportunity for Contra Costa County to be ambitious and visionary with regards to environmental justice. We should embrace this opportunity to improve health by focusing on policy and environmental change (PEC). The new General Plan should reflect what our community needs and wants for the next 20 years. We need to be as specific as possible in our language in order to have more accountability.

We observed that one of the key elements that is missing is defining success or progress, and how we will measure improvements. If we're not measuring or evaluating our actions, we won't know if we're improving or by how much. We need benchmarks and targets. We should challenge ourselves to add numbers, and SMART goals (specific, measurable, achievable, realistic, time-bound). Health Services does not recommend using health outcomes exclusively as an overall metric to determine the success of General Plan implementation.

Overarching comments for each goal

Goal EJ-A: Equitable distribution of social and economic advantages among all communities in the county so that no community is disproportionately burdened by environmental pollution or other hazards.

Overarching comments: Aiming for an ambitious goal here would be ideal. Our aim should be not only to “equitably distribute ... advantages,” but also work to decrease disadvantages and dismantle the social and economic consequences of historic redlining and continued racial discrimination in unincorporated Contra Costa. We want to ensure that no community is disproportionately burdened by environmental pollution or other hazards. We would like to see that future social and economic investments and opportunities are equitably distributed.

We need to work to reduce current local exposure to pollution. One way to consider doing this would be by implementing AB 617 in all the identified disadvantaged communities in our County.

Goal EJ-B: Equitable and convenient access to fresh and healthy foods among all communities in the county so that all residents find it easy to make healthy food choices.

Overarching comments: Food access is closely linked to individual and community food security. We would like to see these terms in the goal, as well as promoting local agriculture. We propose “equitable and convenient access to fresh, healthy, culturally appropriate, and affordable food...”

Goal EJ-C: Equitable access to safe and sanitary homes among all communities in the county so that no resident has to live in an unsafe or unhealthy place.

Overarching comments: Need to include access to an adequate supply of affordable housing and a commitment to house all residents (elimination of homelessness)

Goal EJ-D: Equitable access to job training, job opportunities, and economic stability among all communities in the county so that all residents can access safe jobs, earn a living wage to support their families, and build shared prosperity.

Overarching comments: We propose adding “clean industry” besides “safe” jobs.

Goal EJ-E: Equitable engagement with all communities in the county so that all residents share an equal voice in decisions that affect their community.

Overarching comments: There are place-based and racial-communities. How are we defining communities? Proposed language: “Plan for and ensure the meaningful, continuous engagement and involvement of environmental justice and disadvantaged communities in the county’s decision-making process so that their voices are taken into consideration in the decisions that affect their community.”

Make sure community profiles are a living document where residents continue to have a voice. Points to ponder: Who speaks for local community? How many voices do we need to feel like the community is equitably represented?

Goal EJ-F: Equitable, convenient access to a safe, affordable, multi-modal transportation network among all communities in the county so that all residents, regardless of age, ability, race, culture, or economic status, are less dependent on cars and enjoy opportunities to walk, bike, roll, or take transit to their destinations.

Overarching comments: One of the goals with transportation, from the health perspective, is to *encourage* active transportation and physical activity. Overall, the goal is lacking in numbers and specificity. We would like to see metrics on mileage and distance. We know, for example, that 15 minutes of walking every day increases life expectancy by 3 years and saves over \$1250 per person in healthcare costs.

Goal EJ-G: Equitable distribution and quality of public facilities, infrastructure, and services among all communities in the county so that the fundamental needs of all residents are met and all residents can access the services they need.

Overarching comments: We would like to see services defined. As we work to minimize current disparities in the distribution of facilities/infrastructure, continue to fund investments until there’s an equitable distribution. Policy shouldn’t just be just to increase funding or access, but that residents are using and benefiting from existing infrastructure and services. Need to purposefully decrease the existing disparities.

Goal EJ-H: Equitable and convenient access to health services among all communities in the county so that all residents can find the physical and behavioral health care services they need within their community.

Overarching comments: We’re glad to see *convenient* included. It would be great to define it, such as “one-stop, co-located health services.” Place matters. When defining “all residents,”

make sure it includes undocumented individuals. We want to cover everyone over the next 20 years. How do we define access? We should incorporate technological/remote capabilities to enhance access. We will need to ensure technological infrastructure exists for this type of access, as well as proper transportation access. Wording could be:

“Equitable and convenient access (in-person and virtual), to one-stop, co-located health services for all residents in the county, including the undocumented, so that everyone can find the physical and behavioral health care services they need within their community.”

Can we do GIS mapping of where people are and where health services are? Where are the health resource deserts? Ideally, we would define that X percent of health service facilities should be within X distance of public transport and disadvantaged communities.

The County needs to consider recent migration trends from West to East County, and what that means for location of health services. Also study future migration patterns and plan ahead to provide appropriate health care services as communities change.

Goal EJ-I: Equitable access to safe recreational activities and parks among all communities in the county so that all residents are empowered to choose an active lifestyle that supports their health.

Overarching comments: We propose “Equitable access to and use of convenient, safe, well-maintained recreational amenities and parks distributed throughout all the communities, so that everyone, regardless of age, ability, race, culture, or economic status in the county can choose an active lifestyle that supports their health.”

With COVID (and any future pandemic) it will be important to keep parks open as essential, empowering staff to keep showing up so they can keep County parks open. Published articles in the American Academy of Pediatrics describe the importance of public parks for public health. Parks are both prevention and treatment. In fact, CCHS and others have been issuing Parks Prescriptions – to get patients out to parks for pediatric and adult obesity. NIMBYism, is a force to reckoned with. Some people don’t want all members to enjoy public facilities. Need to combat that. Borrow language from Goal F: add “convenient” (add place-based metrics, geography, miles, distance), besides access and safety. Regardless of age/culture/economic status – to be more specific about the communities we are serving. Structural and perceived barriers need to be removed. Think about cross-section work between F and I.

Goal EJ-J: Equitable and healthy air quality among all communities in the county so that all residents, including those with high sensitivity to unhealthy air, can live in their community without facing disproportionately high risks of respiratory disease and other health problems.

Overarching comments: It would be better to word this goal in terms of reducing exposure to air pollution and improving air quality. Ideally the goal would include an air quality assessment to identify “hot spots” of poor air quality. Improving air quality is critical to the health and well-being of all people and the environment. The need to reduce specific air contaminants (ground-level ozone, particulate matter, and toxic air contaminants) from stationary, area-wide and mobile sources needs to be part of this goal.

Goal EJ-K: Communities that are safe and resilient from hazards associated with the use, *manufacture*, transport, *storage*, treatment, and disposal of hazardous waste and hazardous ~~substances~~ *materials*, including from fossil fuels, chemical refining, and power plants *as well as other sources such as pipelines, rail lines, and truck transportation*.

Overarching comments: Please see proposed changes in italics and strike-through.

New proposed Goal EJ-L: Mitigation, adaptation and resiliency strategies to address the impacts of climate change are equitably distributed throughout the unincorporated areas of the County, ensuring that vulnerable populations already suffering disproportionate health outcomes are protected from further impacts of climate change.

Specific Comments on Policies and Actions

GOAL A: Equitable distribution of social and economic advantages among all communities in the county so that no community is disproportionately burdened by environmental pollution or other hazards.

POLICIES:

Policy EJ-A.1 Incentivize and streamline public and private investment in new development or redevelopment that promotes community goals in disadvantaged communities, as identified in the community profiles.

Comments: Are community profiles static? Can community profiles be living documents that get updated with some frequency? Need continuous communication, engagement, and ownership by community about decisions in their areas.

We propose using this language: “streamline *the permitting and approval processes* of public and private investments...”

Need to make sure overburdened communities undergo more rigorous assessment. Concerted effort to bring opportunities for green/clean economic development.

Policy EJ-A.2 For projects that would significantly impact a disadvantaged community, pursue community benefits agreements that achieve the community goals identified in the community profile.

Comments: If you can't mitigate the pollution or adverse unavoidable environmental impact below significant levels, don't allow it. Zoning needs to protect the health of residents in DCs, and new projects should be reviewed with the lens of protecting residents' health and well-being. Community benefit agreements are not enough. Allowed uses need to be reviewed based on impact to health, such as adding new air pollution in hot spots. Consider disallowing that use if it's already concentrated there. When considering this type of project in a DC, residents hear “jobs” and don't hear “safety/health concerns.” The community needs to be made aware of how much pollution will come in with a project, and how it will be mitigated. Use clear language.

Consider **requiring** community benefit agreements in DCs, not just “pursue.” Add “ensure that the community is involved in the negotiation of the agreements...”

If such a project is to be allowed in a DC, then economic advantages should go TO the communities that live in the community and will be impacted.

For example, there's a distribution center going in North Richmond. Should this DC bear the brunt of the additional impacts from this facility? Are the economic benefits (potential jobs) worth the health risks? Could it go somewhere else where there are fewer people living nearby? Analyze where it's going with a racial justice, environmental justice lens, in close consultation with and with considerable decision-making by the community.

Policy EJ-A.3 Until fossil fuel industries are phased out, require any proposed project requiring a use permit for a fossil fuel industry or its accessory infrastructure that would impact a disadvantaged community to include early and substantial community engagement as part of the permitting process. As conditions of approval, such projects must include substantial community benefits that support the goals identified by the community in the community profile.

Comments: Do we mean specifically and only **fossil fuel** industries, or do we mean **petroleum refining** industries? Only about 40-60% of each crude oil barrel is used for “fuel” – the rest is used for a multitude of products. We need to be clear about this language.

We could follow Richmond’s example with their re-zoning of the port. By changing the zoning, the port facilities are now a non-conforming use. With future project proposals, the city can say “no.” This type of phasing-out needs to take into consideration safety – non-conforming uses still need to maintain a certain level of safety, so maintenance for safety’s sake should continue to be allowed. The County could Zone petroleum refining industries out of existence and not wait for them to be “phased out.”

DCD needs to make the planning process accessible to allow for maximum community involvement (engagement and power-sharing).

Policy EJ-A.4 Phase out existing fossil fuel industries and transition to just, equitable, and clean industries that offer good-wage jobs.

Comment: Add time horizons – when it says “phase out fossil fuels” it should say over what period of time. Also, same comment about “fossil fuel” vs. “petroleum refining” applies.

Instead of saying phase out, say “facilitate the transition of petroleum refining industries to” just, equitable and clean industries that offer good-wage jobs.

Policy EJ-A.5 In order for an application for a major development project to be deemed complete, require applicants to document to the County’s satisfaction how the project will promote environmental justice **and health**, including how the project will ensure the following:

- (a) Its costs and benefits will be shared equitably;
- (b) Its economic opportunities will be shared equitably;
- (c) It will not displace existing residents or businesses in disadvantaged communities; and
- (d) It will avoid direct, indirect, or unintended negative impacts on the quality of life **or health** of residents within disadvantaged communities. Source: EJ Assessment tool developed by Sustainability Commission

Comment: “...require applicants to document to the County’s *and the community’s* satisfaction...” Require health impact assessments (not just EIRs), using established methodologies. Consider incorporating funding sources for conducting Health Impact Assessments, such as licensing or permitting fees. Have them done objectively and maintain a pool of third-party consultants to conduct them. Develop a scale or menu of impact so that the right level of assessment is done for the type and size of project being considered. If the impact is significant – then do a HIA.

Policy EJ-A.6 *Prioritize clean-up of illegal dumping in disadvantaged communities.*

New proposed policy: Assess and reduce the existing burden of environmental pollution and other hazards in disadvantaged communities by creating a schedule by when certain uses will be phased out or the impact of existing uses mitigated.

New proposed policy: Narrow the legal parameters for granting zoning variances and other discretionary entitlements, which encourages adherence to adopted land use policy deriving from community engagement.

New proposed policy: Every time the County updates its Capital Improvement Program (CIP), make sure that it aligns with the community profiles in the General Plan, involve residents, and consider adopting community participatory budgeting in the development of each CIP.

New proposed policy: Apply a minimum 500 ft. overlay buffer measured from the edge of a freeway Right-of-Way (ROW) or high-trafficked corridor with significant diesel truck, goods movement and/or vehicular traffic. This buffer should be extended to 1,000 ft. for corridors with adjacent residential areas abutting, especially for the downwind side of freeways to account for the impact of nocturnal pollution drift.

GOAL A ACTIONS:

Action EJ-A.1 In coordination with impacted communities, workers, and business/industry, develop and implement a plan to phase out fossil fuel **and other highly polluting** industries and transition to just, equitable, and clean industries that offer **fair or living good**-wage jobs. The plan should address site remediation responsibility and strategies to improve the health, safety, infrastructure, job opportunities, and revenue opportunities during the shift to a zero emission/**clean energy** economy, paying special attention to helping develop new opportunities for how disadvantaged communities will realize economic, health, and other benefits.

Comment: Is there a timeline? By when? See proposed language in bold, green, above.

Action EJ-A.2 Develop criteria for evaluating projects that would potentially impact a disadvantaged community. For projects that would adversely impact a disadvantaged community, establish required project approval findings to ensure that community benefit agreements or other mitigation efforts would achieve the community goals identified in the community profile. As part of this work, define what constitutes a major development project in or adjacent to a disadvantaged community; as indicated in other policies and actions in this General Plan, such projects may be subject to additional requirements compared to projects that don't meet that definition.

Comment: Significant impact shouldn't occur in a DC. Overriding considerations should not be accepted in DCs. If less than significant, strengthen community voice and ensure economic benefit is **to** that community, and do health impact assessments (HIA) based on size of project.

Not only consider the economic cost of denying the use, but the health benefits/cost savings of not allowing it, when considering socio-economic impact of land-use decisions. Have the community weigh in. If less than a significant impact, make sure the community has a voice. Establish an assessment process to identify current status of DCs. Use an existing best practice like HIA criteria, rather than developing new criteria.

Action EJ-A.3 Develop a checklist that establishes criteria to evaluate how new development supports the County’s environmental justice and health goals and the environmental justice and health-related community goals identified in the relevant community profile.

Comment: Oakland adopted an [Equity Checklist](#).

Action EJ-A.4 *Upon each review of the General Plan [will cross reference a Land Use Element action related to regular reviews of the General Plan], work with the Contra Costa County Health Services Department to monitor health outcomes data for disadvantaged communities in order to determine the effectiveness of the County’s environmental justice policies. During this review, assess any updated information related to the delineation of disadvantaged communities in Contra Costa County. Based on these reviews, update the map of disadvantaged communities and environmental justice-related goals, policies, and actions accordingly.*

Comment: The general plan should not rely on health outcome data exclusively to measure the effectiveness of EJ policies. Factors that affect health outcomes are too complex to tie health outcomes back to any particular EJ policy or even all the EJ policies together. Upon each revision of the GP (or on a regular basis) develop appropriate indicators and criteria with CCHS for each EJ policy to evaluate their effectiveness. (Rather than every 20 years look at how the health of the county is doing).

Action EJ-A.5 Explore the feasibility of creating, participating in, or attracting a public bank.

Comment: Proposed language: “Within 2 years, develop a report of the feasibility of creating a Contra Costa public bank or make recommendations for other types of economic development and wealth-building tools, such as a public bank.” Now that California has a law allowing this type of banking institution, we think Contra Costa should do more than explore the feasibility over the next 20 years. Ref: California Public Banking Alliance. Consider other wealth building strategies: social dividends, universal basic income (Stockton has a pilot model for this), have bank revenues go to very low-income residents, etc.

Action EJ-A.6 *Develop and sufficiently fund a program to assist project applicants **from** disadvantaged communities in navigating the project application and review process.*

Comment: Also assist applicants in securing loans for new businesses. See addition of “from” in bold, green. If not already done, consider having local permit/plan check office hours in DCs rather than expecting everyone to travel to Martinez. This would address an access/equity issue.

Action EJ-A.7 *Improve code enforcement and public works maintenance practices to keep disadvantaged communities hazard free, safe, and clean, emphasizing enforcement actions on issues identified by the community in its community profile.*

Comment: Do we have an app where people can document issues by taking photos and uploading them? See <https://seeclickfix.com/>. Can local Municipal Advisory Councils be given a budget to help local residents address minor concerns? Ensure neighborhood preservation and CDBG funds are primarily spent in DCs. We propose language like: Assess current code enforcement and public works maintenance practices in concert with the community to determine if they’re keeping communities safe and hazard free, and develop a plan to remedy any deficiencies or oversights on an annual basis, based on the voice and the will of the residents in these communities.

We would like to see ongoing review of improvements and maintenance - a mechanism for meeting periodically with community leaders to get input on ongoing or new safety and blight concerns.

GOAL B Equitable and convenient access to fresh and healthy foods among all communities in the county so that all residents find it easy to make healthy food choices.

POLICIES:

Policy EJ-B.1 Increase access to fresh food in disadvantaged communities by allowing and encouraging local food production, micro agriculture, edible landscapes, rooftop gardens, community gardens, urban farms, and farmers' markets on vacant or underutilized lands, including publicly owned land, and by distributing information about community-supported agriculture programs that provide affordable access to fresh food.

Policy EJ-B.2 Require new or substantially renovated County facilities that interface with the public and that are located in disadvantaged communities to incorporate facilities and amenities that improve the public's access to healthy food options.

Comment: What do we mean by facilities and amenities? Do we mean vending machines? Very ambiguous. Would it be a garden? Facility for farmers market? Define facilities. Define healthy food and beverage options. Refrigeration? Quick prep kitchen? How can the community weigh in on what this will incorporate? Can this incorporate the healthy vending policy from CCHS county-wide. Bring proposed renovations to the MAC and let them weigh in re: what amenities they would like.

Policy EJ-B.3 Maximize multimodal access to fresh food by encouraging grocery stores, healthy corner stores, and outdoor markets at key transit nodes and within transit-oriented developments.

Policy EJ-B.4 Provide access to public land, cleanup, and other County services for farmers' markets in disadvantaged communities.

Policy EJ-B.5 Encourage farmers and neighborhood community gardens to participate in local farmers' markets.

Comment: We want **Contra Costa** farmers. Encourage is weak. May need incentives. Do we mean participate or start local markets? Is there a farmers' market in every DC? What would be needed to have a farmers' market in every DC?

New proposed policy: Adopt a county-wide sugar-sweetened beverage tax. Oakland, SF, Berkeley already have it. This would be a revenue stream to fund some of the below actions. In Oakland, they retrofitted schools for water fountains. Corner stores for fresh produce. Farmers markets, etc. Work with CBOs to make this happen. We realize that someone at the State is trying to ban sugar sweetened taxes.

New proposed policy: Prioritize grocery store development in unincorporated communities considered "food deserts." Establish Fresh and Healthy Food Enterprise Zones. See [Food Desert to Food Oasis](#) p. 17 report.

GOAL B ACTIONS:

Action EJ-B.1 Prepare a healthy food ordinance that creates incentives and guidelines that support access to healthy food through land use controls, such as streamlined permitting of grocery stores.

When developing this ordinance, work with Contra Costa County Health Services to collect geographic data about current health conditions.

Comment: An ordinance is a policy. Move to Policy section? For land use controls, have these types of uses permitted by right, so no CUPs are required.

Action EJ-B.2 Implement a County Nutrition Action Plan (CNAP) to promote the 2010 Dietary Guidelines, federal and State food security programs, and physical activity.

Action EJ-B.3 Develop guidelines to support implementation of micro agriculture, rooftop gardens, community gardens, urban farms, and farmers' markets, including seeking input from local residents on convenient and accessible locations.

Comment: How about: "In partnership with local residents from DCs, develop an action plan to identify opportunities to implement ... Then identify incentives and funding mechanisms. What would it take to make it happen? Identify challenges and barriers and how to overcome them. Guidelines may already exist.

Action EJ-B.4 Educate local farmers about opportunities for participation in local farmers' markets to bring locally grown food to disadvantaged communities. In addition, encourage farmers' markets to reduce vendor restrictions or entry fees for local farmers to incentivize local participation.

Comment: More than educating local farmers, they need economic incentives and removing barriers. Farmers' markets need funding too. Can the County subsidize some of these efforts?

Action EJ-B.5 Conduct nutrition workshops, health events and social marketing for low income residents to promote healthy eating and active living. (from <https://cchealth.org/nutrition/>)

Action EJ-B.6 Coordinate school and after-school programs as well as peer to peer education to empower families and youth to choose healthy foods, drink water instead of sweetened drinks and live an active life. This could include educational field trips to local farms, community gardens, and outdoor recreation areas. (from <https://cchealth.org/nutrition/>)

Action EJ-B.7 Participate in local coalitions and subcontract with community partners to collaborate with government agencies, child care centers, faith-based organizations, community leaders, food retailers, other businesses and schools to support programs and policies that mitigate child obesity and improve access and intake of healthy foods and physical activity. (from <https://cchealth.org/nutrition/>)

Action EJ-B.8 Encourage worksite wellness through access to healthier food choices in vending machines and promotion of physical activity. (from <https://cchealth.org/nutrition/>)

Comment: Add "in disadvantaged communities." This could also apply to County worksites, not only as an EJ-related action. The County would be well served by a new emphasis on employee wellness as a risk management strategy.

Action EJ-B.9 Collect data for grant funding, program planning and evaluation of interventions to improve access and consumption of healthy food and physical activity. (from <https://cchealth.org/nutrition/>)

Action EJ-B.10 Every five years, review the existing Alcoholic Beverage Sales Commercial Activities Ordinance to ensure disadvantaged communities are not experiencing disproportionate concentrations of or impacts from new bars and liquor stores. To support implementation of this ordinance, set up and maintain a shared data system between the Health Services and Conservation and Development departments that identifies the locations of current establishments, along with information about public safety and public health.

New proposed action item: Expand scope of School-Based Health Clinics in disadvantaged communities to include importance of physical activity and healthy food choices.

New proposed action item: Develop a GIS map of food desert areas in DCs that can be updated every two years.

New proposed action item: Identify, support and partner with existing programs that can help develop community garden programs in DCs. Partner agencies could include: Contra Costa Master Gardeners (UC Davis), Urban Tilth (Richmond), Planting Justice, Eco-village Farm Learning Center and others.

GOAL C Equitable access to safe and sanitary homes among all communities in the county so that no resident has to live in an unsafe or unhealthy place.

POLICIES:

Policy EJ-C.1 Ensure that future improvements in disadvantaged communities will not produce a net loss of affordable housing or the displacement of residents

Comment: add “and will provide adequate housing for the unhoused (homeless). “ How would we ensure this?

Policy EJ-C.2 *Ensure adequate living conditions for tenants through ongoing and effective code enforcement, with priority given to rental properties in disadvantaged communities.*

Comment: Add “Provide adequate funding to maintain and/or abate homeless encampments and provide adequate security for the Coordinated Outreach, Referral and Engagement Teams (CORE) “

Need to define “adequate living conditions.” Is it operable windows, fresh air, no facing polluted source, no mold, running water and working furnaces? Is there an existing list of these?

Policy EJ-C.3 *Coordinate with the Housing Authority of Contra Costa County, affordable housing developers, and other organizations to transition vacant, unentitled land in disadvantaged communities into affordable housing, which could include many types of innovative housing products. This should include homeownership opportunities to help residents build intergenerational wealth.*

Comment: Could this be more of a Public Lands policy? Focus should be on land owned by the public sector for developing affordable housing.

New proposed policy – provide safe places for the unhoused or homeless to go during high heat or smoke events. Create or designate clean air centers in DCs.

New proposed policy – ensure that all housing has sufficiently low air infiltrations rates to provide adequate protection during Shelter-in-place events.

New proposed policy – expand lead poisoning prevention program, or create a new program, to comprehensively address multiple health-related housing quality issues in homes in DCs through coordinated actions with appropriate agencies/programs such as infiltration of outdoor air pollution from point and non-point sources, asthma triggers, mold, asbestos, pest management, energy efficiency, electrification/energy self-sufficiency/back-up power, spills and falls and water conservation. Basically, let’s create a “Healthy and Sustainable Homes” program.

New proposed policy - ensure existing and new multi-family housing units in DCs provide the benefit of Electric Vehicle charging stations, in-home food composting services, and other amenities that decrease their carbon footprint. Consider requiring transition to all-electric appliances and furnaces when permits are pulled for upgrades/repairs above a certain amount.

Can the County plan to phase out natural gas hook-ups in new construction by a certain date?

GOAL C ACTIONS:

Action EJ-C.1 *Develop and implement a rent control and just cause for eviction ordinance to strengthen the protections provided by AB 1482 and provide accessible resources for fair tenant protections in disadvantaged communities.*

Action EJ-C.2 Conduct periodic outreach in disadvantaged communities to inform tenants of their rights and responsibilities. Written outreach efforts should be translated into appropriate languages.

Comment: spell out what department or who would be responsible for this. Could there be a paid team of residents from DCs that could do this on the County’s behalf with the right training? Are there existing tenant unions in Contra Costa that could do this?

Action EJ-C.3 Update the County Health and Safety Code to establish a framework for the County to protect residents’ access to secure housing through eviction moratoriums or other mechanisms when the County and/or State declare states of emergency due to natural or human-made disasters, including epidemics and pandemics.

Action EJ-C.4 Obtain funding for, address barriers to, and increase participation in the County’s weatherization program for extremely low, very low, and low-income homeowners, landlords, and renters, as well as in other programs like the Green and Healthy Homes Initiative, to provide resources to bring older properties up to Code and improve their livability, make minor home repairs and energy improvements, and improve health and quality of life. Focus these resources on homes in disadvantaged communities, and in particular rental housing and high-density housing.

Action EJ-C.5 Create a bulk buying program that allows people to purchase air conditioners, air purifiers, heaters, and other electric appliances at wholesale prices to increase energy efficiency and replace hazardous appliances. Work with volunteer groups to help people install air conditioners and other electrical appliances if they are unable to do so themselves, focusing on disadvantaged communities and other areas with high levels of vulnerable people. Consider augmenting energy efficiency programs to reduce electricity use and help offset the cost of operating electrical appliances.

Comment: Consider adding something about incentives to install solar panels in homes in DCs through grants and other incentives to offset cost of more electric appliances. Who would create the bulk buying program and where would the funding come from?

Action EJ-C.6 Partner with a local solar company to enact a solar group buy program to purchase solar panels and battery storage in bulk for installation in disadvantaged communities, including the establishment and subsidization of community solar programs for joint membership, which aggregate multiple consumers' electricity sourced from a single photo-voltaic solar location. The program should include an educational component to teach the community about the benefits and process of solar installation and give them the opportunity to sign up for the program at a discounted rate.

Comment: Rather than a local solar company, could it be a solar cooperative? There's one in Alameda County. Then it would be run by them. Maybe action could be to support the development of such a cooperative in Contra Costa, and would probably need to partner with MCE.

Action EJ-C.7 In collaboration with nonprofit and for-profit developers, obtain funding for and establish community land trusts serving each disadvantaged community that will support long-term community ownership and housing affordability.

Comment: reword to have action verb first. Include having the County offer some of its land to future land trusts as an in kind contribution that could lead to affordable housing and local ownership. Who in the County would be in charge of establishing these trusts?

Action EJ-C.8 *Expand the County's first-time homebuyer program to provide more education and assistance, prioritizing outreach and marketing in disadvantaged communities to spread awareness of the program.*

Comment: consider creating a pool of residents who can be trained and hired to conduct this education and outreach in DCs.

Action EJ-C.9 *In coordination with Contra Costa Health Services, create an inventory of available land for tiny homes or other types of innovative housing products as alternatives to accommodate people who lack housing.*

Comment: This would not be CCHS's role. CCHS Homeless Program can collaborate with this effort.

Action EJ-C.10 Collaborate with Contra Costa Health Services and the Contra Costa Council on Homelessness to develop and implement a plan to *provide transition facilities and services for people*

facing homelessness. Link homeless programs with supportive services such as behavioral health, substance abuse, and primary health care.

Comment: Need to update definition of transitional facilities to current understanding.

Action EJ-C.11 Conduct periodic outreach to absentee owners of properties in disadvantaged communities to inform owners of their legal obligations to maintain rental properties in safe and habitable condition. Keep tenants informed of these efforts, including by translating the information into languages other than English.

Action EJ-C.12 Continue to support the Contra Costa Lead Poisoning Prevention Project's programs, including services for children, public health nurse case management, home environmental investigation, education and outreach, and information and referrals for parents, home remodelers and child care providers. (from <https://cchealth.org/lead-poison/>)

New proposed action – conduct an analysis of housing in areas highly likely to be impacted by a Shelter-in-place event to identify housing that needs to be upgraded to provide adequate protection from a chemical release or fire and inform and encourage enrollment to those residents of programs (such as weatherization) that can assist them to make the necessary improvements.

GOAL D Equitable access to job training, job opportunities, and economic stability among all communities in the county so that all residents can access safe jobs, earn a living wage to support their families, and build shared prosperity.

POLICIES:

Policy EJ-D.1 Actively work across County departments and agencies to attract businesses that provide desired goods and services in disadvantaged communities, including food stores with fresh produce, health care, childcare, pharmacies, and other retailers. Balance community desires with comprehensive assessments of market demand to guide business attraction efforts.

Policy EJ-D.2 Actively work across County departments and agencies to attract manufacturing businesses in the clean technology sector, especially those that will not increase emissions in or near disadvantaged communities.

Policy EJ-D.3 Promote entrepreneurship and locally owned businesses and enterprises in disadvantaged communities to support economic self-sufficiency and stability, including through training and outreach to local small business owners.

GOAL D ACTIONS:

Action EJ-D.1 *Explore the feasibility of establishing a First Source Hiring Program requiring project applicants to make best efforts to hire new employees, workers, and subcontractor components of the project from the local area.*

Action EJ-D.2 Partner with community organizations, large employers, trade associations, unions, and job training skills centers to support enhanced job-skills training, recruitment programs and services, and childcare services to support workers in disadvantaged communities. Work with experienced groups to ensure that programs will be properly staffed and funded. Training and intervention strategies should reduce barriers to employment for youth, formerly incarcerated residents, and residents with limited

English proficiency, and they should support a just transition toward a sustainable economy by re-training fossil fuel-based workers with skills for green industrial jobs.

Action EJ-D.3 *Explore strategies to establish a revolving loan fund or other economic development initiatives to support small businesses in disadvantaged communities.*

GOAL E Equitable engagement with all communities in the county so that all residents share an equal voice in decisions that affect their community.

POLICIES:

Policy EJ-E.1 Notify the community through the County website and coordination with community organizations and leaders when County planning decisions are being considered in or adjacent to disadvantaged communities. Conduct outreach and engagement with disadvantaged communities as follows:

Comment: also use bilingual mailed notices to households that catch one’s attention. In DCs, go beyond the minimum proximity required for notices (if 300 ft, go to 500 ft, and so on – expand the geography that will get notified). Go beyond the website and use social media and other platforms.

- ☒ Prepare public notices and other materials in the predominant language(s) spoken in the community and provide interpretation services at meetings as needed.

- ☒ Make public notices and other important documents available in print at local libraries, community centers, or other gathering places.

Comment: Notices need to be in plain English, easy to understand, including easily understood by LEP (Limited English Proficiency) residents.

- ☒ Use approaches appropriate for the community.

- ☒ Schedule, format, and locate community workshops and meetings to be convenient for community members and provide childcare.

- ☒ Use social media, virtual meeting platforms, and other communication techniques for those without time or ability to attend public meetings.

- ☒ Consider data that reflects the economic, gender, age, and racial diversity of the affected population. [Source: EJ Assessment tool from Sustainability Commission]

- ☒ Clearly explain potential adverse impacts of a proposed project in plain language that is easily understood by the target community.

Comment: The County needs to move toward power-sharing with communities in the spectrum of community engagement efforts. Please reference <https://www.iap2.org/mpage/Home> as a great resource.

Policy EJ-E.2 Support community-driven or community-led initiatives in disadvantaged communities that work toward the goals identified in the community profiles. Support could include technical assistance and providing staff resources and meeting spaces, among other methods.

New Proposed Policy Support community-driven efforts to build capacity in neighborhoods so that residents may meaningfully participate in the County’s planning and land-use decision making processes. Consider compensating residents for their time, a stipend, for participation at decision-making meetings.

New proposed policy: Provide training and support for residents to learn how to engage in civic processes. Develop mechanisms to give residents more power in the decision-making process. Provide training to staff on environmental justice principles, implicit bias, and cultural humility.

GOAL E ACTIONS:

Action EJ-E.1 In coordination with leaders and stakeholders from disadvantaged communities, prepare a community engagement toolkit that identifies outreach and engagement activities based on the project type and stakeholders involved in order to build community participation and ensure all voices are represented.

Comment: Consider looking at BAAQMD’s Public Participation Plan as a model.

Action EJ-E.2 *Establish an ongoing environmental justice advisory group comprised of community members from disadvantaged communities to advise and assist the County in addressing disproportionate health, safety, and welfare in disadvantaged communities,*

Comment: Best practices in community engagement call for time-limited and issue-specific engagement. It would be more authentic and meaningful to engage residents on a project-by-project or issue-by-issue basis, inviting local community leaders to participate in the decision-making process as early as possible. Only engage residents if their wisdom/input/ideas have a genuine chance of being implemented, adopted or included. If the County wishes to create this type of group, then we recommend that it be advisory to the Board of Supervisors and abide by Brown Act requirements.

Action EJ-E.3 Identify, initiate, and formalize partnerships with community organizations and leaders in disadvantaged communities to ensure that local residents can make significant contributions to planning processes.

Comment: Identify community leaders, develop relationships, initiate dialogue, and work to jointly develop partnership agreements with residents or CBOs from DCs to ensure that their voices are heard and their contributions are taken into consideration during the decision-making process. To accomplish this, the County needs to invest in hiring multi-cultural Community Engagement staff in key Departments.

Action EJ-E.4 Partner with the County Administrator's Office and appropriate departments to identify communities with a significant number of non-English speaking households and develop resources and strategies to better engage them.

Comment: Use the latest Census 2020 data also.

Action EJ-E.5 As part of the General Plan annual progress report to the Board of Supervisors, describe the County’s efforts to meet the needs of each disadvantaged community. The report should specifically summarize the extent to which the County has implemented the policies and actions identified in each disadvantaged community profile.

Comment: Not only in the profiles, but in the GP overall.

Action EJ-E.6 Hold at least one public meeting per year in each disadvantaged community, including representatives from the full spectrum of County Departments, to hear from residents of these communities, and use that input to inform the County’s annual budgeting process. Provide translation and childcare services at these meetings.

Action EJ-E.7 Support community events, such as block parties and community service days, that support social connections, neighborhood identity, and behavioral health.

Comment: add National Night Out.

Action EJ-E.8 Partner with community organizations and franchise garbage haulers to optimize community clean-up days in disadvantaged communities, including by focusing clean-up activities in disadvantaged communities over other communities that are part of the same contract.

Comment: Need to prioritize and schedule clean-ups FIRST in DCs, not just “focus” on them. Need robust outreach to encourage participation – negotiate this in contracts with haulers. The action could include to review and update as allowed existing hauler franchise agreements to include robust outreach, prioritize clean-ups in DCs, and ensure active participation by local residents and/or CBOs.

GOAL F Equitable, convenient access to a safe, affordable, multi-modal transportation network among all communities in the county so that all residents, regardless of age, ability, race, culture, or economic status, are less dependent on cars and enjoy opportunities to walk, bike, roll, or take transit to their destinations.

POLICIES:

Policy EJ-F.1 *Support improvements to transit, bikeways, and sidewalks in disadvantaged communities to make active transportation more accessible and user-friendly while decreasing vehicle speeds, congestion, and air pollution. Prioritize infrastructure projects identified in disadvantaged community profiles.*

Comment: Add protected bike lanes.

Policy EJ-F.2 *Prioritize energy-efficient street lighting programs in disadvantaged communities, particularly at parks and transit stops, along commercial corridors, near high density housing, and in high crime neighborhoods.*

Comment: Add sufficient, not just energy-efficient lighting.

Policy EJ-F.3 Prioritize transit shelters and benches or other seating at transit stops in disadvantaged communities, especially along commercial corridors and near high density housing.

Comment: These shelters should include shade, be comfortable, have phone-charging ability. Need better signage too. Some places have electronic signs with ETAs. Those would be a desired improvement. These types of amenities are an equity issue.

There needs to be an assessment of the distribution of transportation services and amenities and rectify inequities.

Policy EJ-F.4 *Support local transit providers in establishing and maintaining routes and services that provide disadvantaged communities with convenient access to employment centers, shopping, healthy food outlets, and services. Support extended hours to serve shift workers.*

Comment: Where are Truck routes addressed? – may need to add.

Policy EJ-F.5 Support development of small-scale neighborhood nodes that provide a range of neighborhood-serving retail, public amenities, and services to residents of disadvantaged communities within walking distance of their homes.

Comment: Define “walking distance” – what are best practices or definition? Include user friendly and more accessible – updated schedules for bus routes. Convenience, operational boundaries, access. Need to add more specificity to assessment re: route availability.

Do we mean a "walking district"? the term "node" does not make much sense to lay people

Policy EJ-F.6 Work with school districts and neighborhood groups to ensure that safe walking, bicycling, and transit routes to school exist, prioritizing the development and maintenance of sidewalks, crosswalks, street lighting, bicycling infrastructure, transit stop amenities, automotive speed controls, and other safety improvements in disadvantaged communities, including in residential areas and near schools, libraries, and recreational facilities.

Comment: Mention Automotive speed control, that pulls in pedestrian safety, Safe Routes to School. Bring in injury prevention policies. Make sure it is much more specific. Need to add a Vision Zero policy. Can we work with them to transition to electric school buses?

GOAL F ACTIONS:

Action EJ-F.1 *Engage in community-based transportation plans or other initiatives by transit providers that seek to expand the hours of operation, operational boundaries, convenience, and quality of accessible transit services to improve mobility for seniors, people with disabilities, and other vulnerable communities.*

Comment: We want to see more than engage. Actively advocate for this. Promote.

Action EJ-F.2 Develop a program to subsidize transit passes, *including BART*, for residents of disadvantaged communities.

Comment: Be more ambitious. Scope viability of free transit to specific groups. LA has a good working paper for college students and learners. Lots of co-benefits, GHG decrease, PA increase. Potentially borrow from them. They may have done a health impact assessment of that free transit policy. May have been anyone who was a student. Big blue bus.

Safe connectivity to trails and BART transportation. Need to map it, assess it, ID gaps, and plan to decrease gaps.

Action EJ-F.3 Create and promote a program to facilitate partial and/or temporary street closures for amenities such as parklets and community events such as farmers' markets, block parties, or bicycle and pedestrian events, if requested by residents. Support community members by providing timely feedback and processing permits.

Comment: These permits are often costly and prohibitive for DCs. Will this be financed or will the costs be waived in DCs?

Action EJ-F.4 Develop a program to establish, maintain, and enforce truck routes in the unincorporated county. This program should establish criteria for designating truck routes, signage, and enforcement mechanisms.

Comment: Work with BAAQMD, and make sure this action also enforces idling. Make sure signage is in multiple languages. Include a trucker education component, involve community in making this happen.

Action EJ-F.5 Partner with adjacent jurisdictions and regional transportation planning committees to manage regional movement of goods in unincorporated areas to encourage truckers to remain on freeways and regional routes while minimizing impacts on residents and other sensitive receptors in disadvantaged communities. Seek creative options to deter trucks from residential streets in disadvantaged communities, acknowledging that California Highway Patrol may not have the resources to provide enforcement of truck routes.

Comment: Can this type of action happen county-wide, and not just in unincorporated areas? Goods movement is more of a regional concern.

New Proposed Action: More transparent enforcement of idling trucks. Get an app, submit to online portal, triggers appropriate enforcement agency to follow up with it. Health department can empower residents, flipping "not in my back yard" and trucks not in my front street. Use the CAL ITHIM tool to help find the active travel metrics mentioned above, ensure the long-term benefits are achievable.

GOAL G Equitable distribution and quality of public facilities, infrastructure, and services among all communities in the county so that the fundamental needs of all residents are met and all residents can access the services they need.

POLICIES:

Policy EJ-G.1 Systematically prioritize investments in public facilities, infrastructure, and services that benefit disadvantaged communities and respond to the needs identified in the community profiles.

Comment: Need to designate a responsible department, or this will fall through cracks.

Policy EJ-G.2 Assist disadvantaged communities in establishing funding and financing mechanisms – both community-generated mechanisms like building improvement districts and County-initiated mechanisms like landscape and lighting improvement districts – to provide community-desired public facilities and services.

Comment: Not very clear who is responsible. Do we mean business improvement district? Haven't heard of "building" improvement districts. Consider implementing Redevelopment 2.0: infrastructure financing districts - already a State law that allows these to be formed.

Policy EJ-G.3 Coordinate with the planning efforts of various service providers (e.g., water, sewer, and recreation districts) to ensure efficient and effective service delivery in disadvantaged communities.

Comment: Add EQUITABLE to efficient and effective.

“Advocate for and coordinate with... for proper planning, maintenance, and implementation of services and infrastructure in DCs to ensure equitable, efficient and effective...”

GOAL G ACTIONS:

Action EJ-G.1 Review needs and services in each disadvantaged community as part of the annual budgeting process.

Comment: Not just review but develop a plan to address the needs. Not just prioritize funding, but do an assessment of distribution of services to ID gaps, then fund those to bring up to equitable levels.

Is there a MAC in every DC? If not, create one, so this type of effort can be reviewed or led by them.

Action EJ-G.2 Identify, secure funding for, and implement green infrastructure projects in disadvantaged communities that support the community goals identified in the community profiles.

Comment: Can the County come up with matching funds to augment grant funding? How about a creating a Community Climate Resiliency District to fund these types of projects?

Action EJ-G.3 Explore options for the County to provide seed grants, micro loans, or similar funding to community-based organizations or public-private partners to support green infrastructure or other related improvements in disadvantaged communities.

Comment: Instead of “explore options”, establish a process or develop a program to provide sufficient grant funding in DCs to improve green infrastructure and related projects. Add a community

engagement process for equitable distribution of funds. Establish methods of accountability. Define green infrastructure: tree planting? Bioswells? What else?

Action EJ-G.4 Compile, maintain, and make easily available a list of numbers to call for basic needs such as code enforcement, housing assistance, food assistance, and healthcare. Provide this information in multiple languages.

Comment: Add code enforcement to 211, or ensure that information is incorporated if not already there. Then delete this action item.

Action EJ-G.5 Establish a task force of County department heads or their immediate deputies and other stakeholders (e.g., cities, local environmental justice organizations, and other service providers) to coordinate efforts, provide oversight, and otherwise ensure that public services and facilities in disadvantaged communities are prioritized and efficiently and effectively delivered.

Comment: What about the community? This does not make sense – what services? What facilities? Why a TF? Not clear what’s the desired outcome. Including cities? Other service providers? Is it an advisory body? Is this really a body to provide oversight? Will it have to abide by the Brown Act? If a task force idea moves forward, consider looking at the historical success of PEHAB (Public and Environmental Health Advisory Board), and consider re-activating it.

Action EJ-G.6 Encourage internet providers to improve access to reliable, fast internet access in disadvantaged communities at affordable prices.

Comment: Encouraging ISPs to do this is not enough. The County needs to work toward universal access to broadband in DCs. Ideally, to help level the playing field and address systemic and historic inequities, broadband internet access in DCs should be free and accessible to all residents. Actions should have a policy relating to them. There’s no policy about internet access.

New proposed action: In order to show success with Goal G, the County needs to first do an assessment about the distribution of services to identify gaps in DC communities.

GOAL H Equitable and convenient access to health services among all communities in the county so that all residents can find the physical and behavioral health care services they need within their community.

POLICIES:

Policy EJ-H.1 Work with Contra Costa Health Services and community-based organizations to expand community health-related outreach, analysis, and implementation efforts in disadvantaged communities.

Comments: We think what needs to expand is community engagement, along with outreach, analysis, and implementation of efforts that will decrease health inequities in disadvantaged communities. Meaningful resident engagement can lead to building and sharing power within disadvantaged communities. Mention the [IAP2](#) spectrum of community engagement and participation as a guide.

Expand and improve the delivery of culturally appropriate and comprehensive health services in DCs

Policy EJ-H.2 *Collaborate with non-profit partners and Contra Costa Health Services to attract medical clinics, behavioral health facilities, and pharmacies in areas that lack access to health care, prioritizing disadvantaged communities.*

Comment: In addition, work to increase and improve access to and development of culturally relevant recreational and physical activity opportunities that promote community health.

New proposed policy: Ensure all residents can get to health-related appointments by providing free or affordable transportation options, such as shared rides or shuttles.

Note: The Health Department is developing a document, Living Contra Costa. This is a cross-sector effort that will have health outcomes and a data dashboard. It will be important to incorporate key principles/elements of Living Contra Costa in the new General Plan. CCHS will follow up on this as it moves forward.

Note: There will soon be a new Office of Racial Equity and Social Justice, along with a new plan. It would be important to reference the plan/effort in the new General Plan, as well as the Board of Supervisor's resolution declaring racism as a Public Health crisis. Acknowledge that racism has an impact on physical and behavioral health.

GOAL H ACTIONS:

Action EJ-H.1 Minimize zoning requirements for medical facilities to reduce barriers to development.

Comment: Please widen scope from medical facilities to include behavioral health facilities and other health-promoting amenities. Plan to involve the neighboring community early and often to prevent NIMBYism. Add "in disadvantaged communities."

New proposed action: Commission a study of current conditions and location of health and health-promoting facilities/amenities using mapping and distance from residences to services in order to identify and address gaps.

GOAL I Equitable access to safe recreational activities and parks among all communities in the county so that all residents are empowered to choose an active lifestyle that supports their health.

POLICIES:

EJ-I.1: Assist with coordination to support joint use recreation facilities serving disadvantaged communities.

Comment: Add more detail. Look at San Diego's park policies. The more detail, the more it allows for multi-sector resources. For example, schools. Not just public schools, but also private schools. Give some examples. Start with Support joint use of rec facilities in DCs.

EJ I.2: Increase access to diverse, high-quality parks, green space, recreational facilities, and natural environments for disadvantaged communities. Design and maintain these facilities to offer a safe and comfortable environment for residents of all ages and abilities.

Comment: We like the mention of all ages and abilities but need to address challenges for youth and elderly specifically. Check with Vee Ibarra from Developmental Disabilities council, do they have suggestions?

How do we define access? Can we add a metric, like a park within 1/4 mile of all residents.

EJ I.3: Rather than allowing in-lieu fees, require major new development projects in disadvantaged communities to improve existing park and recreation amenities within the community and/or to add new amenities within the project, ideally open to the public. In-lieu fees may only be used when amenity improvements or new amenities are not feasible, as determined by the County.

Comment: It would be stronger to just not allow in-lieu fees and not include the second sentence. Add "developer" before fees. Require a portion of the amenities/parks/green spaces to be open to the public, not just "ideally"

Priority should be to build new parks/amenities and only require that they themselves maintain/improve existing parks when it is impossible for them to build on their property. But make it hard not to build on their property -- even if on the roof. Make sure that we define in-lieu as park in-lieu or open space in-lieu fees.

EJ I.4: Require new or substantially renovated County recreational facilities located in disadvantaged communities to incorporate facilities, amenities, and public spaces that create opportunities for physical activity and social interaction.

Comment: Social isolation is dangerous to health. Post pandemic, promote social gatherings. Cost and access to facilities is an issue. It increases social connection and cohesion. Living Contra costa has a "belonging" measure. Need to link General Plan with Living Contra Costa. Belonging is a sense of living safely. Think of metrics to measure progress.

EJ I.5: Increase recreation opportunities in disadvantaged communities by working with other agencies to convert public easements, such as utility corridors or unused rights-of-way, into parks and trails.

Comment: For example, EBMUD, EBRPD, name names. Expand multi-use corridors. Mapping and extension between trails, linkages in those DCs. Potentially add "Geomapping" – use it to show gaps between corridors and trails. Will give leverage to use these resources. Ultimately it will need to identify who – what partner, or which staff. Promote buses to go to parks together, active living. Note: Connect with Alice Kinner and Mona Koh, multicultural health education lead, EBRPD.

Need to identify who will cover MOPs (Maintenance, operations, policing).

GOAL J Equitable and healthy air quality among all communities in the county so that all residents, including those with high sensitivity to unhealthy air, can live in their community without facing disproportionately high risks of respiratory disease and other health problems.

POLICIES:

Policy EJ-J.1 Require a cumulative health risk assessment, including consideration of truck traffic impacts, when a project potentially affects sensitive receptors in disadvantaged communities, and require appropriate mitigation based on the findings of the assessment.

Policy EJ-J.2 When evaluating health risk impacts of projects in disadvantaged communities, use a cancer risk of 1.0 per million as the threshold for a significant impact.

Policy EJ-J.3 Require new development to site sensitive receptors such as homes, schools, playgrounds, sports fields, childcare centers, senior centers, and long-term health care facilities as far away as possible from significant pollution sources.

Comment: Instead of saying “as far away as possible, establish buffer zones for placing sensitive receptors near all sources of pollution, and for placing sources of pollution near sensitive receptors using ARB guidelines and the Air District’s Planning Health Places guidelines as a starting point. Prohibit housing to be built within worst case scenario zones established for industrial facilities in the Risk Management Plans for those facilities.

Policy EJ-J.4 When evaluating air quality impacts of projects in disadvantaged communities, use thresholds of significance that match or are more stringent than the air quality thresholds of significance identified in the current Bay Area Air Quality Management District (BAAQMD) Air Quality Guidelines.

Policy EJ-J.5 Consider future General Plan and/or Zoning Code amendments as needed to support BAAQMD in meeting AB 617 objectives to reduce the health impacts of air pollution in Communities of Concern.

Policy EJ-J.6 Prioritize new street tree plantings and increase the tree canopy in disadvantaged communities, in particular areas with a high heat index.

Comment: Replace with a policy in the Climate equity section that addresses heat islands.

Policy EJ-J.7 Preserve, restore, and enhance natural landscapes in and near disadvantaged communities for their role in improving air quality and community health.

Comment: Too vague. Minimal standards should be established and implemented.

Policy EJ-J.8 Require warehouse and distribution facilities to provide adequate on-site truck parking to prevent idling and require refrigerated warehouses to provide generators for refrigerated trucks.

Policy EJ-J.9 Prohibit *all* fossil fuel powered truck, construction vehicle, and transit vehicle idling within 100 feet of sensitive receptors such as homes, schools, playgrounds, sports fields, childcare centers, senior centers, and long-term health care facilities.

Comment: Include a time limit.

New proposed policy: Require projects to evaluate and mitigate the health risks from surrounding air pollution for the future occupants of the project, not just impacts of the project on the surrounding environment.

New proposed policy: Require all recent BMPs established for trucking

GOAL J ACTIONS

Action EJ-J.1 Coordinate with State and regional regulatory entities and community members to fund citizen-led data collection, monitor pollution exposure, and identify and implement solutions in disadvantaged communities.

Action EJ-J.2 Assist BAAQMD in establishing and implementing Community Air Monitoring Plans for disadvantaged communities.

Action EJ-J.3 Coordinate with BAAQMD to *determine where to focus* create a targeted *facility* permit inspection program in disadvantaged communities to help ensure enforcement of air quality permits.

Comment: Who and how – County does not permit air quality. Does this refer to DCD issued permits?

Action EJ-J.4 Enforce the State’s five-minute maximum idling law.

Action EJ-J.5 Prepare an urban forest master plan for the county that includes quantified goals and tracking methods, prioritizing disadvantaged communities.

Comment: Instead of prioritizing, say “ensuring there is equitable distribution of urban forests.

Action EJ-J.6 Develop and implement a plan to provide clean air refuges during times when outdoor air quality is unhealthy.

GOAL K Communities that are safe and resilient from hazards associated with the use, *manufacture, transport, storage, treatment, and disposal* of hazardous waste and hazardous ~~substances~~ *materials, including from fossil fuels, chemical refining, and power plants as well as other sources such as pipelines, rail lines, and truck transportation.*

POLICIES:

Policy EJ-K.1 Discourage construction of new large-scale hazardous waste facilities.

Comment: Need to clarify if this means TSD (Treatment, Storage and Disposal) facilities or facilities that use large amounts of hazardous materials or generate large amounts of hazardous waste. Need to define large. Discourage has no meaning. Either prohibit or restrict in disadvantaged communities.

Policy EJ-K.2 Advocate for and coordinate with local and regional agencies in efforts to remediate or treat contaminated surface water, groundwater, or soils in or affecting disadvantaged communities.

New Proposed Policy – Provide equitable inspection and enforcement of hazardous material and hazardous waste regulations throughout county.

New Proposed Policy - Require meaningful community engagement and involvement in the Community Warning System.

New Proposed Policy – Ensure there is adequate sites for the collection of household hazardous waste (HHW), unused pharmaceuticals, and wastes generated by boats and marinas, including provisions for residents that don't own cars or are physically unable to deliver materials to a collection site.

Proposed New Policy – Staff of the Hazardous Materials Program should be trained on environmental justice topics to increase their ability to recognize potential environmental justice or implicit bias issues.

Proposed New Policy – The Hazardous Materials Program should engage with the Contra Costa County Department of Conservation and Development (DCD), regarding hazardous material and hazardous waste considerations during the planning of new business operations in the County. The Hazardous Materials Program should engage with DCD in their efforts to solicit input at an early stage from disadvantaged communities on proposed projects involving hazardous materials and hazardous waste that may create a disproportionate impact on the community.

GOAL K ACTIONS

Action EJ-K.1 Obtain grant funding and establish partnerships with local environmental justice organizations to implement the County's Brownfields and Contaminated Sites Cleanup Policy in disadvantaged communities.

Comment: The County doesn't have a B & C cleanup policy. Need to rework. County applying for grants is ok but need to clarify role of non-profits is to conduct the community engagement.

Action EJ-K.2 Establish a comprehensive, long term strategy that coordinates efforts from all regulatory agencies to mitigate impacts from industrial facilities on adjacent communities, both acute and long-term, with priority given to developing strategies for disadvantaged communities. The strategies must include specific mitigations to address air pollution, pipeline risks, and accidents, including identification of and community education about evacuation routes.

New Proposed Action – Evaluate the inspection and enforcement efforts of the Hazardous Materials Programs to determine if services are equitably distributed and develop action plan to address deficiencies.

New Proposed Action – Review effectiveness and alternatives to Marina collection programs to determine best method moving forward.

Proposed New Action – Develop department-wide procedures and training for reporting observed environmental justice issues, and address issues pertinent to the Hazardous Materials Programs.

Proposed New Action – Establish a comprehensive outreach strategy to provide hazardous material program policy information to disadvantaged communities, including considerations related to hazardous materials and hazardous waste storage, permitting, and inspections, environmental monitoring, hazardous materials incident response, industrial safety ordinance and pollution prevention. Identify and leverage established community and industry groups and other synergistic agency programs to disperse outreach and education materials.

Proposed New Action – Identify and designate a communications liaison to ensure that hazardous materials and hazardous waste topics are presented to disadvantaged communities in a manner that is easily and clearly comprehensible.

Proposed New Action – To the extent possible, invite community representatives to observe ‘hands-on’ emergency drills to increase public awareness of emergency response capabilities and understand protective actions the public may be required to take should a hazardous materials incident occur in their community (shelter-in-place and evacuation procedures). Ensure representatives from all populations, including disadvantaged communities, have the opportunity to observe drills, including the availability of language translation services.

New proposed Goal EJ-L: Mitigation, adaptation and resiliency strategies to address the impacts of climate change are equitably distributed throughout the unincorporated areas of the County, ensuring that vulnerable populations already suffering disproportionate health outcomes are protected from further impacts of climate change.

Proposed Policies and Actions for New Proposed Goal L

1. Require all future development projects to address potential impacts of climate change including sea level rise, flooding, heat, drought, and wildfire smoke.
2. Require existing business that use, store, treat or dispose of hazardous materials and hazardous waste to mitigate for the potential impacts of sea level rise
3. Require current transportation corridors to mitigate for the potential impacts of sea level rise.
4. Review and craft policies and actions based on recent heat vulnerability study, regarding heat islands, painted surfaces, etc. The study found some areas are much more vulnerable to heat. Some were transportation related.
5. Incentivize electric busses, trucks, etc., vs internal combustion engines. Help operationalize the Governor’s transition to all-electric new cars on the roads. Especially those that travel through DCs.
6. Identify funding sources and assist residents in DCs to transition to electric vehicles, electric appliances, solar panels, etc.
7. Use a climate vulnerability index to identify and map areas of need. (CDPH has a tool that already does that).
8. Take into consideration rising tides, rising temperatures, and other health impacts of climate change when making land use decisions, so impacts in disadvantaged communities are mitigated or adaptation projects are prioritized.