

## MEMORANDUM

DATE May 25, 2022

TO Will Nelson, Principal Planner  
Contra Costa County Department of Conservation and Development

FROM Tanya Sundberg

SUBJECT 5/11/22 Planning Commission Study Session

During its meeting on Wednesday, May 11, 2022, the Planning Commission held a study session to discuss and provide feedback on the draft goals, policies, and actions (“GOPAs”) for the Conservation, Open Space, and Working Lands Element. There were approximately 74 participants in the meeting during this discussion item.

This memorandum summarizes the questions and comments from the Planning Commission, as well as the comments made by members of the public. Additional written comments are attached to this memorandum.

### Initial Planning Commission Questions and Comments

- » Commissioner Mankin
  - Does Policy COS-P14.2 apply only to new permits? If this policy were applied broadly to all inactive/capped [oil and gas] wells and in place four years ago, major development areas in eastern Contra Costa wouldn’t have been able to develop given the number of capped/inactive wells in the area. Homes in the Brentwood Hills area are experiencing foundation problems due to proximity to wells.
  - When will the California Supreme Court hear the Monterey County case discussed in the staff report?
- » Commissioner Amin
  - Does Policy COS-P14.2 restrict both new sensitive receptor uses and wells? Or does it just restrict new wells?
  - How are sensitive receptors defined? Would a single rural home qualify as a sensitive receptor?
  - In Action COS-A14.1, what is meant by bullet b?
  - Are there any other uses that the County should ban outright, as opposed to enacting strict regulations on the use?
- » Commissioner Van Buskirk
  - Asked for clarification of existing well regulations. How would existing wells be affected by Policy COS-P14.2?
- » Commissioner Bhandari
  - When will this policy guidance be approved by the Board of Supervisors relative to the pending California Supreme Court case?

- » Commissioner Allen
  - Why are we not taking a position while the Court case is pending?
  - Does the policy guidance under Goal COS-14 apply to fracking?
  - When will we consider the Zoning Code update?
- » Commissioner Hillesheim
  - How many wells (active and inactive) are there in the county?
  - Is anyone from the public attending the meeting who is not in favor of banning oil and gas drilling?
  - Suggested that Goal COS-13 be revised to say: “Increased generation of and reliance on renewable, sustainable, and zero-carbon energy and reduced energy use.”
  - Is nuclear energy sustainable?
  - Noted that the Planning Commission recently considered projects involving renewable diesel. The renewable diesel was classified as renewable even though it involves a fossil fuel. This seems disconnected from the discussion of banning oil and gas wells.
- » Commissioner Van Buskirk
  - Has the State conducted any studies regarding hazardous waste from car and truck batteries?
  - Suggested that the County shouldn’t pigeonhole our energy resources by cutting off all sources.
- » Commissioner Hillesheim
  - How would requiring fully electric homes reduce energy use?
- » Commissioner Van Buskirk
  - Noted that he has installed energy efficiency improvements in his home, but it doesn’t seem to be making a difference.

#### Public Comment

- » 31 commenters requested that the County ban new oil and gas wells and phase out existing operations. These commenters noted the following:
  - The County should be proactive on this matter to support community health and combat climate change. If the Supreme Court case later confirms that the County lacks the authority to ban oil and gas wells, we can change the policy then.
  - Taking a stand against fossil fuel extraction would show young people that we care and are responding to the climate crisis. Young people are angry and anxious about climate change. Climate change is the greatest health threat that humanity has faced. The IPCC has said that we must stop all oil and gas drilling by the end of this decade.
  - Allowing continued oil and gas extraction would conflict with the County’s Climate Action Plan and its declaration of a climate emergency.
  - Oil and gas wells are hazardous to the health of nearby residents. Communities of color and children experience disproportionate health impacts from oil and gas wells. Health impacts have been shown to occur as far as 13,000 feet from preproduction wells and 6,200 feet from operating wells. Economic prosperity cannot occur without public health, as we learned during the pandemic.
  - Plume clouds can carry pollution over homes and schools. Acute and long-term pollution levels need to be monitored and information conveyed to residents.

- Wells can make nearby lands settle, causing property damage. There are also seismic hazards that add to the risk from these wells.
  - Inactive wells can be reopened through CalGEM without a public process; the County should require the same studies and public processes as new wells.
  - There is a huge problem with abandoned wells not taking responsibility for site reclamation by declaring bankruptcy. Bonds should account for inflation.
  - Some types of extraction require large amounts of water, which is especially problematic during the drought.
  - We aren't dependent on local oil and gas extraction for our energy needs, so a ban wouldn't affect our energy supplies.
  - Nuclear energy is not a sustainable or safe option, nor appropriate to consider at a county scale.
- » Emily Hopkins
- Expressed support for the GOPAs related to wetlands and for the suggested edit to Goal COS-13 by Commissioner Hillesheim.
- » Karen Rosenberg
- Expressed support for GOPAs related to climate resilience.
  - Requested a new policy to require consideration of managed agricultural and working lands as strategic assets for climate resilience.
  - Requested increased transparency and accountability by adding more specificity to the GOPAs.
- » Janet PyeGeorge
- Expressed concern over the General Plan Update timeline, noting that Rodeo needs urgent action to bring more activity and vitality to the community.
- » Jackie Garcia Mann
- Offered to coordinate a presentation on electrification to the Commission through 350 Contra Costa.
- » Ivy Poisson
- Requested clear definitions for ecological terms, including "conservation," so that we have appropriate benchmarks.
  - Requested an inventory of significant ecological areas and special status species.
  - Requested more targeted and finite policy language, including to revise COS-P1.1 to say: "Support efforts by public agencies and non-profit organizations to acquire and permanently protect open space areas with ecologically significant or scenic resources and areas that would connect other protected lands to form a cohesive system of open space, provided and plan infrastructure to avoid such acquisitions ~~do not interfere with planned infrastructure improvements.~~"
- » Jan Warren
- Expressed support for GOPAs that protect wetlands.
  - Suggested that the GOPAs streamline prescribed burning as a land management technique and proactively protect the Delta.

- » Jenny Balisle
  - Described her work with County staff to incorporate arts into this element, noting that the County's Arts and Culture Commission recently dissolved to shift to a new non-profit model. Requested that arts be addressed in the General Plan.

#### Additional Planning Commission Questions and Comments

- » Commissioner Amin
  - Requested clarification regarding next steps for the GOPAs and the General Plan.
- » Commissioner Allen
  - Requested a description of how the County's oil and gas policy has evolved over time.
- » Commissioner Mankin
  - Expressed concern about health impacts from oil and gas drilling and consistency with the emergency climate resolution. Given the pending Court decision, suggested consideration of a larger setback requirement that would drastically limit oil and gas wells, while avoiding an outright ban. Also suggested consideration of a moratorium on new oil and gas wells while the case is pending. Noted that oil and gas drilling in the county is unlikely to lower energy costs for county residents and businesses, while costs to public health are high. Expressed support for transitioning away from oil and gas extraction as quickly as possible, but also in consultation with County Counsel and with a practical approach.
- » Commissioner Bhandari
  - Expressed support for County regulations that are more restrictive than the State regulations, such as a larger setback requirement.
- » Commissioner Hillesheim
  - Clarified judicial vs legislative body responsibilities.
  - Noted that existing wells have vested rights, and the County can't take that right away.
  - Stated that staff has done a good job of restricting proposed new wells, noting that it's difficult to get a new oil well approved now. Expressed support for free enterprise and limiting regulations.
- » Commissioner Van Buskirk
  - Suggested a commonsense approach, noting that he was raised in the area with exposure to wells and didn't experience health impacts. Expressed opposition to banning oil and gas wells, but is open to a larger setback requirement. Stated that we're not ready for 100-percent renewable energy, so we should move forward responsibly. Noted that the fossil fuel industry has allowed many families in the county to be successful. Expressed support for energy independence and making it cleaner.
- » Commissioner Allen
  - Requested clarification of next steps based on comments received at the meeting.
  - Expressed support for Commissioner Hillesheim's suggested revision to Goal COS-13 and Commissioner Mankin's suggestion to increase the setback distance for oil and gas wells.
- » Commissioner Allen made a formal motion to recommend incorporating Commissioner Hillesheim's revision to Goal COS-13 ("Increased generation of and reliance on renewable,

sustainable, and zero-carbon energy and reduced energy use.”). The motion was unanimously approved.

- During discussion of this motion, Commissioner Mankin clarified permit requirements for wells, and Commissioner Allen suggested that plume cloud paths could be used to formulate setback distances tailored to the location.



30 Muir Road  
Martinez, CA 94553  
April 11, 2022

Honorable Members of the Contra Costa Planning Commission:

East Bay for Everyone is a network of people fighting for the future of housing, transit, tenant rights, and long-term planning in the East Bay. We like the goals set out in the Conservation, Open Space, and Working Lands Element. We are concerned that the goals in the document conflict with Contra Costa County's actual plans. We think these can be addressed by modifying the plans to match the goals set out in the document.

The goals in the document are admirable - preserve open space, conserve ecological resources and wildfire habitats, preserve creeks, uplands, and manage groundwater. However, these appear to conflict with the County's existing plans.

## Byron Airport Development Program

Byron is a car-oriented area of Contra Costa County very far from existing job centers and surrounded by undeveloped land. Contra Costa County is currently planning a massive expansion of development around the airport "to promote economic self-sufficiency."

This development plan in the middle of greenfield space, a 25 minute drive from the nearest BART station and a 2+ hour commute to San Francisco runs contrary to the goals laid out in the Envision 2040 Open Space document. Additional car and plane traffic will harm not only local wildlife but lower air quality throughout the region and contribute to increasing temperatures through climate change.

We oppose the Byron Airport Development Program and think that **DCD and the Planning Commission should add an "Action" bullet point abandoning the Byron Airport Development Program and focusing instead on more intense development in existing communities that are located closer to job centers and transit.**

## State Route 239

Contra Costa County is working on a new highway that will connect Byron to Highway 4 and Highway 580. This freeway will be built largely by tearing up greenfield space.

We are opposed to constructing a new freeway because we think that it will encourage car dependence, damage local ecologies, reduce air quality, and contribute to climate change. Even if Contra Costa County switches to 100% electric cars, 65% of PM2.5 car pollution comes from disc brakes and rubber tires, which electric cars still have, in addition to the polluting effect from manufacturing new batteries and cars.

We also think that the planned construction State Route 239 goes against the goals laid out in this document and think that **DCD and the Planning Commission should add an "Action" bullet point to abandon State Route 239 as part of the Open Space and Energy Use goals in the Envision 2040 Plan.**

## Leaking Gas Wells

We appreciate the "Action" to require a land use permit for opening new gas wells. However, we think a much bigger problem is leaking methane from poorly maintained or abandoned wells. This problem is part of a strategy some energy companies pursue, to develop older wells more slowly. Because gas wells do not need to be sealed until they run dry, drawing a trickle of gas every year means that older wells can leak for decades. This was documented in the Bloomberg story by Zachary R. Mider and Rachel Adams-Heard, "An Empire of Dying Wells," published on October 12, 2021.

- **DCD and the Planning Commission should require new wells to place a deposit in escrow** that can be used to pay for closing the well, in the event the company managing the well goes out of business.
- **DCD and the Planning Commission should also require new wells to draw gas at a minimum rate per year or shut down the well.** This can prevent the problem where a company draws a tiny amount of gas from a well each year, which allows them to defer fixing leaks and shutting the well for decades.

## DCD Staff Recommending New Housing Outside the Urban Limit Line

Last year, the Contra Costa County Board of Supervisors voted to approve 125 single family homes outside the urban limit line at Tassajara Parks. The lots in the project are 5000 to 12,500 square feet each, which allows room for a lawn. The project is far from public transit and it is still unclear who is going to provide water for these 125 single family homes. A fire last summer came within a half mile of the development.

We opposed development at Tassajara Parks. While the Planning Commission voted to oppose the development, DCD staff recommended that the project be approved. We think that staff recommending new development outside the Urban Limit Line is contrary to the goals laid out in the Envision 2040 Plan.

**DCD and the Planning Commission should add an Action bullet point that says "DCD staff will not recommend the approval of developments located outside the Urban Limit Line."**

## Infill Housing Conserves Water and Reduces Energy Use

Multifamily housing with minimal amounts of car parking, located near existing public transit, is much, much better for the environment than building new single family homes in green space. Car light development located close to job centers is much, much better from the perspective of reducing energy use, than adding more homes in Byron where the occupants will water their lawns and then commute via car over the Altamont Pass.

Adding denser housing will also help increase the effectiveness of public transit and allow BART and the County Connection to run more buses along the same routes. More property tax revenue in a smaller area will also allow for additional investments in bike and pedestrian access that can further reduce car traffic.

**DCD and the Planning Commission should add an Action that commits the County to increase the amount of infill housing, and develop land more intensely inside the Urban Limit Line.**

## You, the Planning Commission Have the Power to Shape the Future of Contra Costa County

As members of the Planning Commission, you are the community's appointed representatives for shaping the future of the community. You have more of a voice in the Envision 2040 Plan than virtually anyone else. **You can give direction to staff** during the meeting, or voice your opinions to the County Supervisors. Staff can use your feedback to create a better document.

The Envision 2040 Plan is very much a draft. You still have the power to change it, and to change the way we use land in Contra Costa County, to live up to the stated goals of the Plan. We hope that you will use it.

Signed,  
The 2500 members of East Bay for Everyone





May 11, 2022

Kevin Van Buskirk, Chair and Members  
Contra Costa County Planning Commission  
30 Muir Road  
Martinez, California 94553

via email: [planninghearing@dcd.cccounty.us](mailto:planninghearing@dcd.cccounty.us)

**RE: Conservation Element of the updated County General Plan - ENVISION CONTRA COSTA 2040 (County File #GP18-0001)**

Dear Chair Van Buskirk and Members of the Planning Commission,

Thank you for the opportunity to comment on the Conservation, Open Space, and Working Lands Element of the updated Contra Costa County General Plan (CCGP).

We are sharing our comments and recommendations on Section C.1. of the CCGP (Ecological Conservation Resources) and related sections in line with the topic areas outlined in the Planning staff letter for the Commission and the public, including:

1. A Comprehensive Conservation Element – It includes all policy issues and information relevant to this element
2. Goals, Policies, and Actions (“GOPAs”) effectively address the relevant policy issues
3. The Goals, Policies, and Actions work together to achieve the desired outcomes

These topics, and our recommendations, are discussed in detail below.

### **1. A Comprehensive Conservation Element.**

The staff report introduction to “Ecological Resources and Natural Systems” states that the Goals, Policies, and Actions (GOPAs) need not restate the regulations enforced by these agencies but instead bolster those regulations and address locally important issues.

Going beyond minimum regulations requirements, we recommend that Conservation Element represent a vision in line with the “Envision” framing of this General Plan update as “Envision Contra Costa 2040.” In that light, we recommend including:

- a definition of conservation;
- updated maps of conservation areas, priority conservation areas, as well as flora and fauna lists that is featured in the existing General Plan; and,
- an action statement that the County will achieve conservation of 30% of Contra Costa’s land for plant and wildlife habitat by 2030.

**1.a. RECOMMENDATION: Section C., Goal COS-4. Include a definition for conservation.**

This goal is to “preserve... and enhance... ecological resources and wildlife habitat;” however, there are no further definitions of what “preserve,” “enhance,” and “conserve” means, in terms of practical and actual results. So that the public, elected officials and staff, and interested parties can know what this goal will look like, please include a working definition of conservation to serve as a guidepost for what the County intends to achieve during the next 15 years. We recommend having at the very beginning of Section C. the definition that is now guiding land conservation across California:

*“Land and coastal water areas that are durably protected and managed to sustain functional ecosystems, both intact and restored, and the diversity of life they support.”<sup>1</sup>*

**1.b. RECOMMENDATION - Section C., Goal COS-4. Include conservation inventory maps and details on the County’s conservation priority areas and species.**

The staff report for the Planning Commission notes that the “Open Space Element must inventory open space for natural resources...and open space for recreation.” Furthermore, “the inventory should be reflected on maps, and policies must provide for conservation of the inventoried areas wherever possible.” In the fifteen years since the current plan was published, agencies and non-profit organizations have produced several sophisticated “gap” maps (i.e., maps of land plus conservation value), maps, and inventories. For example, in our April 20, 2021 letter to Planning staff, we requested that the East Bay’s high ecological value Botanical Priority Protection Areas be represented in the updated General Plan, especially for eastern Contra Costa’s Byron, Delta, and Oakley areas; the foothills and valley surrounding Mt. Diablo; and the Concord Hills peaks and shoreline. See **Figure 1** below for reference.

Thank you for Policy COS-P4.3, which mentions conducting well-timed, comprehensive, and floristic botanical surveys in high ecological value areas, including those mapped by CNPS. Following the release of the General Plan in 2005, East Bay CNPS, the East Contra Costa County Habitat Conservancy, East Bay Regional Parks District, water districts, state agencies, and non-profit agencies have further defined areas of ecological importance in Contra Costa County. In addition to “GOPA’s” in text form, land and habitat conservation is by its very nature best represented in maps describing areas of particular importance and in the listing of sensitive species and habitats. Using internal County data analysis and these valuable data resources, we recommend that the updated plan include updates of the following from the current General Plan within the body of Chapter 7, the Open Space Framework, the following updates:

- Inventory of Significant Ecological Resource Areas of Contra Costa County (Table 8-1)
- Map of Significant Ecological Areas and Selected Locations of Protected Wildlife and Plant Species Areas (Figure 8-1)
- Plant and Wildlife Species of Concern in Contra Costa County (Table 8-2)

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<sup>1</sup> Reference: Pathways to 30 x 30 California – Accelerating Conservation of California’s Nature – State of California Natural Resources Agency



**Figure 1.** Areas in green represent Botanical Priority Protection Areas in Central and eastern Contra Costa County

**1.c. RECOMMENDATION - Include an action statement that the County will achieve conservation of 30% of Contra Costa’s land for plant and wildlife habitat by 2030.**

In addition to conservation priority maps and inventories of sensitive areas and species, we recommend including a metric to essential the goals, policies, and actions. For example, the State of California has embarked on an initiative to conserve 30% of California’s land for biodiversity protection, climate change resilience, and reduce climate change impacts. Currently, 35% of land in Contra Costa County is for urban uses; 65% for open space and working lands. We recommend that General Plan be updated to include an action statement to conserve 30% of the County as durable, conserved lands that must have biodiversity protection. (Note: these lands are usually “GAP Levels 1 or 2,” indicating lands with better protection – broadly, national or state parks, wilderness areas, Areas of Critical Environmental Concern, and natural reserves).

**2. “GOPAs” that effectively address the relevant policy issues.** We have the following recommendations to increase the effectiveness of the GOPAs. Generally, we recommend actions to accompany each policy statement in Section C.

**2.a. RECOMMENDATION - COS-P1.1** – change “provided such acquisitions do not interfere with planned infrastructure improvements” is expansive and indefinite. Recommend “plan infrastructure improvements to avoid such acquisitions.”

**2.b. RECOMMENDATION - COS-A2.2** – remove the phrase “providing mitigation options for impacts resulting from public infrastructure projects (prioritizing mitigation within Contra Costa County),”....the Williamson Act is not permanent. Therefore mitigations for impacts would only be temporary.

**2.c. RECOMMENDATION** - COS-P3.1 – “Preserve large contiguous areas of the County....Deny projects that would lead to fragmentation....”....mirror this Section B. Agriculture Resources and Working Lands policy in Section C. Ecological Resources and Natural Systems.

**2.d. RECOMMENDATION** - COS-P4.1 revise the phrase “Limit development in and near these areas to compatible low-intensity uses.” It is expansive and indefinite.

**2.e. RECOMMENDATION** - COS-A6.1 Thank you for including an action to “Update County Ordinance Code Chapter 816-6, Tree Protection and Preservation, to enhance protection of specified native trees and strengthen mitigation requirements for tree removal. (8-h, 8-i)”

**3. The Goals, Policies, and Actions work together to achieve the desired outcomes.** There are clear inter-relationships between many of the elements and sub-elements of the General Plan and Section C. Ecological Resources and Natural Systems. The Land Use, Housing, and Stronger Communities element can support and enhance the Conservation, Open Space, and Working Lands element. There are also of course, inter-relationships between Section C. Ecological Resources and Natural Systems and the other sections of this General Plan element.

One area that has received attention concerns the need for conservation, open space, and agricultural lands to build resilience against climate change, as well as lands to develop alternative energy sources. The Solar Generation Policy recently adopted by the Contra Costa County Board of Supervisors established appropriate locations for solar energy generation that balances renewable energy needs with other environmental goals, such as the preservation of habitat and open space. In recognition of this policy and its inter-relatedness with Section C., we recommend the following:

**3.a. RECOMMENDATION** - Include as a policy in Goal COS-13 "To balance renewable energy needs with other environmental goals, such as the preservation of habitat and open space, solar generation policies will be established in appropriate locations under the County's Solar Generation Policy."

Thank you again for this opportunity to comment and contribute to the update of the General Plan. If there are any questions, or if we can assist in any way, please feel free to contact us.

Sincerely,

Sally deBecker  
**President**

Cc: Jim Hanson, Conservation Committee Chair  
Ivy Poisson, Member, Conservation Committee

May 10, 2022

County Planning Commission  
c/o William Nelson, Dept. of Conservation & Development

RE: Conservation, Open Space and Working Lands Element

Dear Commission Members,

I have reviewed the draft 'Conservation' Element for the update to the county's General Plan, and offer the following comments:

OPEN SPACE: Support proposed language.

AGRICULTURAL RESOURCES: Generally support proposed language. In addition to supporting Integrated Pest Management, the county should encourage and support organic farming. Also, the plan ought to point out that maximum actions need to be taken to reduce global heating, to lessen the impact on agriculture.

ECOLOGICAL RESOURCES: Support proposed language. However, the plan ought to point out that maximum actions need to be taken to reduce global heating, to lessen the impact on ecological resources.

WATER RESOURCES: Support proposed language. However, the plan ought to point out that maximum actions need to be taken to reduce global heating, to lessen the impact on water resources.

ENERGY RESOURCES: Support much of the language. However, the plan ought to call for switching from fossil fuel systems to electric and solar systems for buildings, transportation, and industry.

OIL & NATURAL GAS: The plan should call for no new drilling, and phasing out the processing and use of oil and natural gas by 2040.

Thank you in advance for your consideration. Please feel free to contact us should you have any questions or comments regarding my suggestions.

Sincerely,

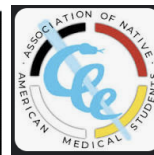
Gary Farber

Walnut Creek

Member: Policy Team of 350 Contra Costa (for information only; letter not endorsed by 350 CC)



CA NURSES  
FOR ENVIRONMENTAL HEALTH & JUSTICE



May 10, 2022

Mr John Kopchik, Director, The Department of Conservation and Development, Contra Costa County

Mr Will Nelson, Principle Planner Contra Costa County

The Contra Costa County Planning Commission

The Contra Costa Board of Supervisors

We, the undersigned organizations and individuals, represent health professionals and students in Brentwood, Antioch, throughout the Bay Area and Sacramento dedicated to protecting and improving the health of our patients and our communities. **We are asking you to end new permitting of oil and gas drilling in Contra Costa County and phase out existing drilling, to protect the public from the well documented negative health impacts of oil and gas development.** What you can do today as elected officials will save more lives than many of us together can, over our entire careers.

Oil and gas development (OGD) is associated with many public health hazards. The most effective way to protect public health from oil and gas operations is to **stop drilling and developing new wells, and phase out existing oil and gas development activities and associated infrastructure.** This is exactly what the [CALGEM Public Health Rulemaking Scientific Advisory Panel](#), convened by the State of California to evaluate the safety of oil and gas drilling, calls the most health protective strategy.

**Oil and gas development affects our children's health even before they are born. The [CALGEM Public Health Rulemaking Scientific Advisory Panel](#) has concluded with "high level of certainty that exposure to OGD (and associated exposures) cause significant increased risk of poor birth outcomes."** Premature birth, low birth weight, and small-for-gestational age births in turn increase **risk of death and long-term developmental problems in newborns as well as illness throughout childhood and adulthood.**



**Children are especially vulnerable** to exposure to toxic chemicals emitted from oil and gas operations. Their brains and bodies are still developing, and exposure to toxicants during critical and sensitive windows of development can lead to illness during childhood, adolescence, adulthood, and across generations. Children also breathe at a faster rate than adults, taking in more toxics per unit of body weight. Children's shorter stature places them closer to the ground where pollutants concentrate. They spend more time outdoors, are more active when outdoors, are more likely to put their hands in their mouth, and are less able to relocate indoors in the event of an exposure without assistance from an adult caregiver. **All of these physiologic and behavioral characteristics of children make them highly vulnerable to pollution from OGD.**

The [CALGEM Public Health Rulemaking Scientific Advisory Panel](#) has also concluded that pollution from OGD causes increased risk of development and exacerbation of **lung disease** such as asthma.

**OGD is a leading source of harmful air pollutants.** [A recently published study](#) based on over 1 million measurements from California statewide air quality monitoring of PM<sub>2.5</sub>, CO, NO<sub>2</sub>, O<sub>3</sub> and VOCs data showed higher concentrations of ambient air pollutants within 4 km (13,000 feet) of pre-production wells (defined as the interval between spudding, or initiation of drilling, and completion) and within 2 km (6,500 feet) of producing wells. Air pollution may have adverse effects on our brains, including associations with [neurodegenerative disease](#), and may lead to **movement disorders** such as Parkinsons. It may have a negative impact on **cognitive ability**, increasing the rate of [dementia in elderly](#), and may cause [depression and anxiety](#).

[Research shows](#) that those who live in areas with poor air quality have a higher risk of severe complications from **COVID-19**.

Oil and gas operations contribute to the widening **health disparity gap** and environmental injustice in our state. The dangerous impacts of pollution from oil and gas drilling fall most heavily on the most disadvantaged, particularly Black, Brown, Indigenous, Asian and low-income communities in California. Non-white (including Hispanic or Latino) Californians account for [69%](#) of approximately **2,763,383 Californians** who live within 3,200 feet of an operational oil and gas well.

Some pollutants emitted by OGD (such as benzene, ethylbenzene, and n-hexane) are listed as harmful chemicals that can **harm our reproductive system** or cause **cancer** under [Proposition 65](#) and thus are recognized as such by the State of California.

There is also always the **risk of explosions and fires** in the vicinity of OGD, which can expose the public to high heat, smoke, and air toxins.

[Health professionals across the globe](#) recognize that **climate change is a public health crisis**, impacting the health of people now and posing a threat to our children and all future generations. The oil and natural gas industry is the nation's largest industrial source of methane, a highly potent climate pollutant that is responsible for approximately [one-third of current warming from human activities](#).

On January 25, 2022, the Antioch City Council approved a permanent ban on oil and gas drilling, production, and exploratory operations within city limits. On March 22, 2022 Brentwood City Council unanimously approved an immediate moratorium on oil and gas drilling while simultaneously preparing an ordinance to ban drilling. On September 15, 2021 Los Angeles County Board of Supervisors voted unanimously to end new permitting of oil and gas drilling and phase out existing drilling, with protective provisions for those fossil fuel workers whose jobs could be impacted. **Contra Costa County also can take a leading role in protecting its children and their families from the toxic health impacts of oil and gas development.**

We are health professionals who care for patients, their families and communities. **However, the care we provide in our clinics and hospitals can not fix or undo the damage that is caused by oil and gas drilling.** We ask you to do what we cannot, to protect health – ban oil and gas drilling in Contra Costa. We would welcome the chance to discuss this issue further should you wish to.

Sincerely,

Robert M. Gould, MD  
President, San Francisco Bay Physicians for Social Responsibility

Amanda Millstein, MD  
Co-founder, Climate Health Now

Barbara Sattler, RN, DrPH  
Leadership Council, California Nurses for Environmental Health and Justice

Isra Uz-Zaman, MS  
Executive Director, California Chapter 1, American Academy of Pediatrics

Harry Wang, MD  
President, Physicians for Social Responsibility, Sacramento Chapter



Ted Schettler, MD, MPH  
Science Director, Science and Environmental Health Network

Elise Brannen, MD-MPH Candidate  
National Advocacy Chair, Medical Students for a Sustainable Future

Kyle Lakatos, MS, MD/MPP Candidate  
ANAMS Student Chapter at UCSF

Jayla Burton, MPH, MS  
Program Manager, Breast Cancer Action

Marjaneh Moini, MD  
Tova Fuller, MD, PhD  
Michael Martin, MD, MPH, MBA  
Meg Whitman, MD  
Patrice Sutton, MPH  
Janice Kirsch, MD  
Jayla Burton, MPH, MS  
Jonathan Lu, Medical Student  
Nancy Jameson, MD  
David Bezanson, PhD  
Mary L. Williams, MD  
Demetra Stamm, MD  
Susan Penner, RN, DrPH  
Carla Castillo, MD  
Angelina Crans Yoon, MD  
Nancy Myrick, Certified Nurse-Midwife  
Valerie Kahkejian, Medical student  
Brian Sokolow, Health Care Strategist  
Ilana Murphy, L.Ac.  
Helen Wirth, Registered Dietitian  
Sara Muralles, MD  
Joyce Nacario, RN  
Marty Lynch, PhD  
Janet Perlman, MD, MPH  
Eve Yalom, MD  
Elizabeth Anthony, MD  
Teresa Munoz, MD  
AmyCecilia Mogal, MD

Eric Henley, MD, MPH  
Grace Chou, MD  
Jennifer Graber, MD  
Kristen L. Lum, MD  
David Pichardo, MD, MPH  
Rob Boutin, MD  
Eddy Tamura, MD  
Kate Elsley, NP, RN  
Hillary Carneal, MD  
Moses Graubard, MD  
Robin Cooper, MD  
Elise Brannen, MD-MPH Student  
Ogie Strogatz, MSPH  
Marti Roach, MSW  
Kyle Lakatos, MS, MD/MPP Candidate  
Warren Gold, MD  
Megan Shumway, BSN/PHN  
Elissa Epel, PhD  
Meghana Gadgil, MD MPH  
Kaitlyn Van Arsdell, MD  
Kari Nadeau, MD PhD  
Valerie Bengal, MD  
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Cc:

The Contra Costa Health Department

May 10th, 2022

Contra Costa County Planning Commission and  
Conservation and Development Department  
30 Muir Road  
Martinez, CA 94553

**RE: Comments on the Conservation and Open Space Element presented to the Planning Commission on 5/11/2022**

Dear Planning Commission and Planning Staff,

Thank you for providing the opportunity to comment on the draft Conservation and Open Space Element of the Contra Costa General Plan. This element includes goals, policies, and actions that are specific and comprehensive. We were especially glad to see policies that tied the importance of conservation and open space to climate resilience and nature-based solutions. While overall we were pleased with the existing draft, below are some minor recommendations to further strengthen this element:

- Add policy to **require consideration of managed agricultural and working lands** as strategic wildfire resilience assets when positioned as buffers between fire-prone landscapes and communities.
  - See the [Critical Role of Greenbelts in Wildfire](#) for more detail.
- Add language around the use of **prescribed burns** and cultural burns in wildfire resilience, landscape management, and support of tribal communities.
- Strengthen policy, *Encourage new and existing buildings to include **battery storage** systems, especially at buildings with solar energy installations and buildings that provide essential community services*, by adding additional language around pursuing grants and funding opportunities to establish these facilities as Resilience Hubs/ Cooling Centers/ Heat & Smoke Refuges.
- Increase **transparency** and **accountability** by adding specifics to goals and policies, including target dates of adoption, departments responsible for implementation, and pathways to implementation.
- Add language to **ban new oil drilling** and move in the direction of closing out oil drilling to be replaced with green jobs.

**Recommendations:**

- In Goal B1, the use of “sustainable” in agriculture is not very meaningful or specific - does this refer to water use, soil health, regenerative practices, organic, all of the above?

- Goal COS 10 - may be an opportunity to add language around prescribed burns. Prescribed burns and cultural burning are not mentioned at all, could be new action of creating streamlined pathways to using fire as a landscape management technique and allowing for cultural practices

**Policies we like:**

- Discourage conversion of land designated Resource Conservation or Parks and Recreation to urban uses. If such conversion occurs, require mitigation through permanent protection of other open space or park lands for habitat, scenic, or recreation benefits at a ratio to be determined based on the biological, scenic, or recreational value of the land, but not less than 3:1. We appreciate inclusion of specific 3:1 ratio
- "Clustering development to maximize ecological and conservation benefits."
- "Support protection, restoration, and improvement of wetlands, marshes, and tidelands, and emphasize the role of these features in climate change resilience, air and water quality, and wildlife health."
- "Support programs and activities conducted by community watershed groups and volunteers that increase public awareness and encourage stewardship of water resources"
- "Encourage new and existing buildings to include battery storage systems, especially at buildings with solar energy installations and buildings that provide essential community services"
  - a. This could be strengthened by adding language to pursue grants and funding for establishing resilience hubs / heat refuges / cooling centers in these locations

We greatly appreciate that you have considered our input and recommendations over the last few years and look forward to working with you to implement these policies and make Contra Costa as sustainable and resilient in the future.

Regards,

Zoe Siegel and Sadie Wilson  
Greenbelt Alliance