

-----Original Message-----

From: Karl Haug <kbhaug2@gmail.com>

Sent: Wednesday, November 1, 2023 7:00 PM

To: Will Nelson <Will.Nelson@dcd.cccounty.us>

Subject: CC General Plan Draft

The document made available through Save Mount Diablo is not very encompassing.

That said one objective the county needs to adopt is setting goals for county staff and measure actual performance against them.

Karl Haug

From: [DCSD General Manager](#)
To: [Will Nelson](#)
Cc: [Cameron Collins](#)
Subject: Diablo Profile Changes
Date: Tuesday, November 21, 2023 4:51:11 PM

Hi Will,

I have been working with the members of the Diablo Historical Preservation Committee on the Diablo Profile and we would like the first two sentences of the second paragraph of page 1 to read as follows:

Diablo began as the Oakwood Park Stock Farm, a ranch owned by California's "Big Four" (Leland Stanford, Charles Crocker, Matt Hopkins, and Colis P. Huntington, with a fifth partner, David Colton, who built the Central Pacific Railroad) in the late 1800s. Robert Noble Burgess purchased the property in 1912 from David Colton and transformed the Farm into a family-oriented, parklike community of summer homes.....

Please confirm receipt of the email and please don't hesitate to reach out if you have any questions.

Thank you for making the changes and Happy Thanksgiving!

Kathy

Kathy Torru
DCSD General Manager
www.diablocsd.org
generalmanager@diablocsd.org
925 683-4956

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TOWN OF DISCOVERY BAY

A COMMUNITY SERVICES DISTRICT

SDLF Platinum-Level of Governance

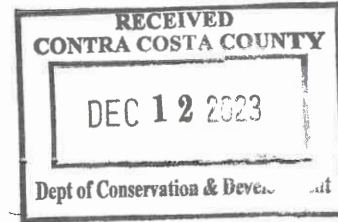


PLATINUM LEVEL

President – Ashley Porter • Vice President – Michael Callahan • Director – Kevin Graves • Director – Bryon Gutow • Director – Carolyn Graham

November 27, 2023

Will Nelson
Principal Planner
Contra Costa County
Department of Conservation and Development
30 Muir Rd
Martinez, CA 94553



RE: Envision Contra Costa 2045 Draft General Plan – Town of Discovery Bay Comments.

Dear Mr. Nelson:

This letter is in response to the Department of Conservation and Development Contra Costa County 2045 General Plan presentation at the Board of Director's meeting held on November 15, 2023. At that board meeting, you invited The Town of Discovery Bay (the District) to provide feedback regarding the Contra Costa County 2045 Draft General Plan.

The District requests that the Contra Costa County Department of Conservation and Development consider the following changes regarding the District's description in the General Plan.

Discovery Bay Context- 1 pg. 112

Paragraph 1 – "Today, Discovery Bay has grown into a full-service town with a community services district that coordinates water, sewer, and recreation services." Please include the District's Municipal Advisory Council responsibility.

Discovery Bay Context – 2 pg. 113

Section Major Vulnerabilities – Remove the reference to the Discovery Bay Fire Station. The East Contra Costa Fire Protection District sold the building, and a private company now owns it. "The Discovery Bay Fire Station and East Contra Costa Fire Protection District buildings are vulnerable to coastal flooding."

The Board of Directors appreciates the opportunity to respond to Envision Contra Costa 2045 Draft General Plan.

Sincerely,

Ashley Porter, President
Town of Discovery Bay Board of Directors

1800 Willow Lake Road • Discovery Bay • CA • 94505-9376

Telephone • 925.634.1131 • Fax • 925.513.2705

www.todb.ca.gov

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From: Email Request
Sent: Monday, December 4, 2023 8:23 AM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg
Subject: FW: Include Buchanan's use of leaded fuel in the Draft Plan

From: Dick Offerman <dickofferman@yahoo.com>
Sent: Monday, December 4, 2023 8:21:47 AM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Include Buchanan's use of leaded fuel in the Draft Plan

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Please include this email in the Draft Plan Feedback.

Hello,

My name is Dick Offerman and I have lived in Pleasant Hill since 1984.

Given this General Plan's stated intention to address community health, I ask the Board to address the health crisis elephant in our skies. Propeller driven airplanes flying over our houses and schools spray us with toxic **lead** dust exhaust, exposing our children to possible irreversible health damage.

After many years of study, on Oct. 18, 2023 the EPA finally announced that exposure to this lead aviation exhaust dust from these airplanes can cause irreversible and life-long health effects in children! These types of planes use a controversial leaded aviation fuel, "Avgas" or 100LL.

<https://www.epa.gov/newsreleases/epa-determines-lead-emissions-aircraft-engines-cause-or-contribute-air-pollution>

Nearby Santa Clara County has led the nation in the testing of the blood of children within 1.5 miles of it's Reid-Hillview Airport. Sadly, they found lead levels in children's blood worse than the 2014 Flint, Michigan "lead in the drinking water" crisis. They have stopped the sale of leaded AVGAS at two of their airports and now offer an unleaded Avgas solution.

We believe that Mount Diablo Unified School District has over 11,000 students in schools near or within that 1.5 mile range of Buchanan. We ask that the County and State Health Department to conduct blood testing of all children living near or attending schools within that zone, given Santa Clara County's findings. Contra Costa County residents also deserve to know.

Lead poisoning can lead to lifelong learning, behavioral, reproductive, heart, and other health problems. We need Contra Costa County, who owns Buchanan Field, to stop selling or taking any deliveries of this toxic leaded aviation fuel at Concord's Buchanan Field Airport.

Please use this General Plan effort to truly protect our children and community. No amount of lead in a child's blood is good. Stop leaded Avgas sales at Buchanan. Switch to unleaded Avgas.

Regards,

Dick Offerman

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: CCC GP
Date: Thursday, December 14, 2023 1:07:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

From: Kerry Guerin <kerry@cbeval.org>
Sent: Thursday, December 14, 2023 1:06:47 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Cc: Alfredo Angulo <Alfredo@cbeval.org>
Subject: CCC GP

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Hi General Plan team,

My name is Kerry Guerin and I'm an attorney with Communities for a Better Environment here in Richmond; my colleague Alfredo Angulo (they/them) is also copied from our community organizing team. As you may know, CBE is a resident member-driven organization that combines scientific research and legal work, guided by community organizing, that advances our members' vision for environmental justice in their communities. It's nice to e-meet you!

I'm getting up to speed on the General Plan updates, and I have a few questions I'm hoping you can help with.

1. The public comment period for both the General Plan and the CAP ends on January 31, 2024, correct?
2. Where can we find the Draft Environmental Impact Report for the General Plan and CAP?
3. When does the public comment period end for the DEIR?
4. Is there a date, time and location yet for the District 1 community open house? I see there are meetings being scheduled in every district, but I can only see the info for Districts 2 and 3 so far.
5. Are there any working groups or advisory groups that we could possibly join related to this ongoing work?

Thanks so much for all your help in advance. Alfredo and I are looking forward to getting more involved with your team and work in the months ahead!

Kerry



Kerry Guerin | (they/she)
Just Transition Fellow
Legal Team
Communities for a Better Environment and
CBE Action, a project of Tides Advocacy
Phone: 510-825-0032
340 Marina Way, Richmond CA 94801
www.cbeval.org

From: Email Request
Sent: Tuesday, December 19, 2023 1:09 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Comments on the contra costa county 2045 General Plan

From: dsonder@mindspring.com <dsonder@mindspring.com>
Sent: Tuesday, December 19, 2023 1:08:26 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Cc: kitsonder@gmail.com <kitsonder@gmail.com>; dsonder@mindspring.com <dsonder@mindspring.com>
Subject: Comments on the contra costa county 2045 General Plan

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I will start by congratulating those that put what is obviously a great deal of effort into the plan. With such a large portion of the geography being in the unincorporated portion of the county as well as the unincorporated area for planning purposes having the largest population I would suggest the following modifications:

1. That a profile be created for unincorporated properties as a Community for feedback as was done with 22 other profiles.
2. That a committee be created that focuses on the issues and challenges with owning property in Unincorporated county.
3. That in the noise section it has a category for Urban properties or homeowners, there should be one for those living in rural unincorporated county
4. The noise section should not only have new policies for new projects and development these should apply to existing lands. Specifically for:
 - a. The Marsh Creek Shooting range which for close neighbors is extremely hazardous as far as noise impact
 - b. Event centers or locations that have concerts next to private home owners

Best Regards,

David Sondergeld

Strategic Technology Executive, Board Advisor

415-602-7847

From: [Tanya Sundberg](#)
To: [Lauren Willey](#)
Subject: FW: Follow up about our property in Alamo
Date: Thursday, April 18, 2024 5:45:53 PM
Attachments: [image001.jpg](#)
[image002.png](#)

TANYA SUNDBERG

Principal

she/her

510.848.3815 ext. 3390 | cell: 510.866.8336

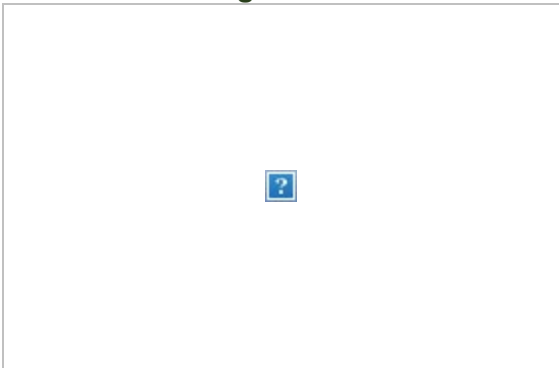
From: Will Nelson <Will.Nelson@dcd.cccounty.us>
Sent: Thursday, April 18, 2024 10:56 AM
To: Tanya Sundberg <tsundberg@placeworks.com>
Subject: FW: Follow up about our property in Alamo

GP comment



William R. Nelson
Principal Planner
Contra Costa County
Department of Conservation and Development
30 Muir Road, Martinez, CA 94553
Phone (925) 655-2898
Web www.contracosta.ca.gov

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From: Tanvir Sattar <tanvir@thesattars.com>
Sent: Thursday, December 21, 2023 9:37 PM
To: Sophia Sattar <sophiaartist3@gmail.com>; Will Nelson <Will.Nelson@dcd.cccounty.us>

Subject: Follow up about our property in Alamo

Mr Will Nelson,

It was such a please to meet you last Thursday at the open house organized by the county in Alamo.

I met you along work my wife Sophia Sattar as our adjoining property 1261 Laverock Lane Alamo and the property just west of it have been suggested/requested by their owners to be converted to medium density home.

This has repercussions on our neighborhood and especially our property, since part of our property 1251 Laverock Ln, Alamo, CA 94507 are surrounded by these 2 above mentioned properties on 3 sides.

This news about our neighbors requesting their property to be rezoned as medium density homes came as a shock news to us. We are extremely concerned about our privacy loss that could happen if multiple homes are constructed on our adjoining property.

If push comes to shove and the adjoining properties are moving forward with the process transitioning to medium density homes and we because of the fear of losing our privacy, if we request to you/County for our property to be rezoned to medium density housing, how do I have control over who buys my property and how the selling price point is decided. Once our property is rezoned for medium density how long do I have to sell the property. Can I sell it separately from our adjoining properties or do we need to sell it together with our adjoining properties.

Thank you

Tanvir Sattar, MD

Sophia A Sattar

From: Soheila Bana <soheilabana@gmail.com>
Sent: Tuesday, January 2, 2024 11:41 PM
To: Will Nelson <Will.Nelson@dcd.cccounty.us>
Cc: Tom Lang <tlangesmac.cc@gmail.com>
Subject: Re: Question about 2045 General Plan

Will,

One quick question: what does the asterisk at the end of some sentences refer to? I could not find anything that defines it.

Thank you,

Soheila Bana

Chair, West Contra Costa Fire Safe Council

(510) 779-7280

WCCFireSafe.org



On Tue, Jan 2, 2024 at 11:18 PM Soheila Bana <soheilabana@gmail.com> wrote:

Hello Will,

Thank you for the great general plan:
Public Review Draft Contra Costa County 2045 General Plan
<https://envisioncontracosta2040.org/documents/>

Here are some Qs about [Chapter 9: Health and Safety Element](#). I am still studying it but in a way it is difficult to study it because the maps do not show cities. For example, FIGURE HS-10 FIRE HAZARD SEVERITY ZONES does not provide a good image of the fire hazard severity in our area because it is missing a lot of information about the surrounding city areas. Would it be possible to include all areas, but perhaps with a different marking/color? Like FIGURE HS-20 EVACUATION ROUTES shows all cities and unincorporated areas, as it should.

Moreover, what are the implications of the policies defined here? For example, there is an area in El Sobrante with a single access road, and it is within the Very High Fire Hazard Severity zone. Does it underscore urgency or attention of the officials to provide evacuation routes for them?

I have more questions for you and hope we can discuss them over Zoom. I hope to hear from you soon.

Warm regards,

Soheila Bana

Chair, West Contra Costa Fire Safe Council

(510) 779-7280

WCCFireSafe.org



From: Email Request
Sent: Monday, January 8, 2024 1:24 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Contra Costa Drilling Policy

From: Alvaro Ramos <ramosalvaro131313@gmail.com>
Sent: Monday, January 8, 2024 1:24:12 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Contra Costa Drilling Policy

You don't often get email from ramosalvaro131313@gmail.com. [Learn why this is important](#)

Dear Contra Costa County,

I am contacting you about recommendations on the new drilling policy.

1. I would like to see a moratorium in place to prevent any more permit approval while the new ordinance is developed. Communities adjacent to Contra Costa oil fields must be fully protected while new policy is developed.
2. The current research shows that a 3,200-foot setback from drilling sites is actually on the lower end of the range of distances that could reduce the harmful health and quality of life impacts from toxic emissions and exposures. A 2021 Stanford study found negative health impacts within a 2.5 mile radius from oil and gas facilities. The state investigatory panel that declared 3,200' setbacks, the minimum protective distance, also found that the most health-protective approach is no drilling at all.
3. Please add a requirement for regular, periodic monitoring of existing oil and gas infrastructure by County Hazardous Materials staff of methane and other dangerous emissions.

Sincerely,

Alvaro Ramos

From: Email Request
Sent: Monday, January 8, 2024 10:11 AM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: No more drilling

From: Jennifer Russell <jenrae54@icloud.com>
Sent: Monday, January 8, 2024 10:10:39 AM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: No more drilling

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- 1. Please put a moratorium in place to prevent any more permit approval while the new ordinance is developed.**
- 2. Current research (from Stanford) shows that a 3,200-foot setback from drilling sites is on the *lower end* of the range of distances that could reduce the harmful health and quality of life impacts from toxic emissions and exposures.**
- 3. Add a requirement for regular, periodic monitoring of existing oil and gas infrastructure by County Hazardous Materials staff of methane and other dangerous emissions.**

Thank you for considering these 3 requests.

Jennifer Russell, ccc resident

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Climate Action Plan - Chapter 7
Date: Monday, January 8, 2024 1:29:47 PM

From: dfgassman@aol.com <dfgassman@aol.com>
Sent: Monday, January 8, 2024 1:29:39 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Climate Action Plan - Chapter 7

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I would like to see a moratorium on any more permit approval during the time that you are doing the “feasibility study” & developing a new land use ordinance to amend the County Code. This is in order to prohibit development of new oil and gas wells. Communities adjacent to oil fields must be fully protected while the new policy is being developed.

Also I am informed that a 3,200-foot setback from drilling sites is actually on the lower end of the range of distances that could reduce the harmful health and quality of life impacts from toxic emissions and exposures.

Thank you very much.

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Comment on New Contra Costa Drilling Policy
Date: Monday, January 8, 2024 2:28:17 PM

From: Leanne Grossman <leanne@portfolio-of-passions.com>
Sent: Monday, January 8, 2024 2:27:56 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request
Subject: Comment on New Contra Costa Drilling Policy

[You don't often get email from leanne@portfolio-of-passions.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To Whom It May Concern:

In looking at Contra Costa's new draft of the Climate Action Plan, I am encouraged by several elements. But I think it's important to ensure that no new oil and gas facilities are put on line until the feasibility study is completed.

The people that live in the area of proposed new drilling should be protected up to and through the development of the new ordinance. Also, It would be vital to adjacent communities to make the setback between them and oil facilities a minimum of 2.5 miles, which is safer than 3200' but not as safe as no drilling.

Finally, all the policies and procedures in the world won't be effective unless monitoring is scheduled, staffed and implemented on all existing facilities.

Sincerely,
Leanne Grossman
Naturalist
Huchiu territory

From: [Tanya Sundberg](#)
To: [Lauren Willey](#)
Subject: FW: The General Plan - HLC - Landmark maps and historic districts.
Date: Thursday, April 18, 2024 5:46:51 PM
Attachments: [image001.jpg](#)
[image002.png](#)
[Chapter 7 CONS-Element History Element 01082024.pdf](#)
[Chapter 8 Public-Facilities-and-Services-Element-1 01082024.pdf](#)

TANYA SUNDBERG

Principal

she/her

510.848.3815 ext. 3390 | cell: 510.866.8336

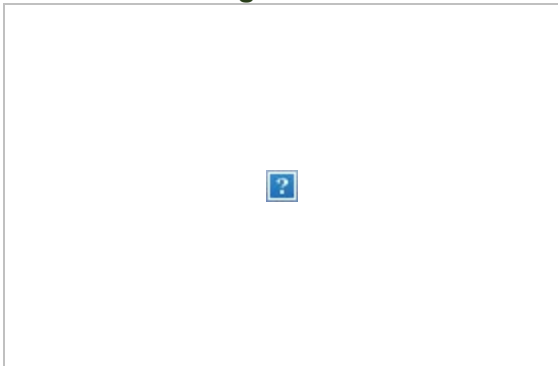
From: Will Nelson <Will.Nelson@dcd.cccounty.us>
Sent: Thursday, April 18, 2024 11:05 AM
To: Tanya Sundberg <tsundberg@placeworks.com>
Subject: FW: The General Plan - HLC - Landmark maps and historic districts.

GP comment



William R. Nelson
Principal Planner
Contra Costa County
Department of Conservation and Development
30 Muir Road, Martinez, CA 94553
Phone (925) 655-2898
Web www.contracosta.ca.gov

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From: Carol Jensen <cajensen@pacbell.net>
Sent: Monday, January 8, 2024 9:50 AM

To: Will Nelson <Will.Nelson@dcd.cccounty.us>

Cc: Dominique Vogelpohl <Dominique.Vogelpohl@dcd.cccounty.us>

Subject: The General Plan - HLC - Landmark maps and historic districts.

Dear Will,

Happy New Year!

I have been wading through the Draft Envision 2045 General Plan Document segment by segment. Yes, I am trying to pay close attention particularly since the Knightsen Historic District meeting is this Wednesday evening.

I keep looking for the map of Contra Costa County indicating all the city limits and providing the location of all the Historic Landmarks on the Historic Landmarks list. You recall our Committee's input into this process over 2-years ago now. I anticipated seeing it either in Chapter_8_Public-Facilities-and-Services-Element-1.pdf or more likely in Chapter_7_CONS-Element.pdf but it is not there. Am I missing it? In what chapter can it be found or your staff just has not created it?

Coincidentally, I see only one historic photograph, the John Marsh House, in the Draft for illustration purposes even though lots of historic monument images are available from the Contra Costa County Historical Society just for the asking.

Looking forward to seeing you and the Knightsen meeting this week.

V/R

[Carol A. Jensen](#)

Chair

Contra Costa County Historic Landmarks Committee

7

CONSERVATION, OPEN SPACE, AND WORKING LANDS ELEMENT

Contra Costa County encompasses a large geographic area containing diverse species, habitats, open spaces, working lands, and natural and cultural resources. This Element promotes conservation, preservation, and enhancement of these critical assets. It is organized around the following nine sections:

- The **Open Space Framework** section includes policy guidance to conserve open space throughout the county to protect ecological resources, provide recreation opportunities, and improve resilience to climate change-related impacts.
- The **Agricultural Resources and Working Lands** section includes policy guidance to protect agricultural lands from conversion to urban uses and support a thriving agricultural economy.
- The **Ecological Resources and Natural Systems** section includes policy guidance to preserve and enhance important ecological resources, including creeks, wetlands, riparian areas, and upland habitat.
- The **Water Resources** section includes policy guidance to sustainably manage surface water and groundwater resources, and protect and enhance the Sacramento-San Joaquin River Delta and shoreline areas.
- The **Historic and Cultural Resources** section includes policy guidance to support identification and preservation of archaeological, historic, and tribal resources in the county, and underscores a commitment to

consult and collaborate with local tribes throughout the planning process.

- The **Scenic Resources** section includes policy guidance to protect the abundant scenic resources in the county, including scenic routes, scenic ridges, and other natural features with scenic value.
- The **Mineral Resources** section includes policy guidance to support mineral extraction operations, which are an important part of the regional economy, while avoiding land use conflicts and negative environmental impacts.
- The **Energy Resources** section includes policy guidance to conserve energy and support a transition to zero-carbon energy sources, such as wind and solar.
- The **Conservation, Open Space, and Working Lands Element Performance Measures** describe how the County will track its progress in achieving some of the major objectives expressed in this Element.

This General Plan highlights policies and actions that address four major themes that serve as a framework for the Plan. For the reader's ease, policies and actions related to these themes are identified throughout the General Plan using the following icons. The policies and actions related to each theme are also compiled in Appendix A. See Chapter 1 for more information about each theme.



Community Health



Environmental Justice



Economic Development



Sustainability

OPEN SPACE FRAMEWORK

Contra Costa County is a unique place where the greater San Francisco Bay Area, Delta, and Central Valley meet. Well over a third of the county's unincorporated area is designated for resource conservation, open space, and parks and recreation uses.



EBRPD manages numerous recreational open spaces, including Briones Regional Park.

Major open space landowners in Contra Costa County include:

- **East Bay Regional Park District (EBRPD)**, which owns and manages over 65,000 acres of parkland in the county.

- **East Bay Municipal Utility District (EBMUD)**, which owns and manages almost 27,000 acres of watershed land in the areas around San Pablo, Briones, and San Leandro Reservoirs.
- **Contra Costa Water District (CCWD)**, which owns and manages approximately 20,000 acres of watershed land surrounding Los Vaqueros Reservoir.

Among the State agencies owning land in Contra Costa County, the California Department of Parks and Recreation (CDPR) owns the most. The 20,000-acre Mount Diablo State Park, surrounding the iconic 3,849-foot peak of Mount Diablo, is the most well-known State park in the county. In addition, land trusts like Save Mount Diablo, John Muir Land Trust, and Agricultural-Natural Resources Trust work in tandem with the local community to conserve open space.

These open spaces are diverse in size and character, ranging from the wetlands and marshes at the gateway to the Delta, to the rugged and wooded 2,800-acre Wildcat Canyon Regional Park, nestled in the Berkeley Hills. Each open space area is defined by a combination of resources, habitats, and agency jurisdiction that require different approaches to preservation, rewilding, and interagency coordination. These open spaces comprise an integrated natural network supporting the county's livability and resiliency to climate change, and are important recreational and scenic resources highly valued by the community. The County therefore partners with other agencies, such as those discussed above and the Contra Costa Resource Conservation District (RCD), and non-profit organizations to ensure that these resources are protected.



Delta waterways are an important open space feature in East County.

Goal COS-1

Preserved open space for environmental protection, resource management and production, recreation, scenic value, and climate resilience and adaptation.

Policies

COS-P1.1



Support efforts by public agencies and nonprofit organizations to acquire and permanently protect open space areas containing important ecological or scenic resources and areas that connect protected lands to form a cohesive system of open space. Plan infrastructure to avoid interfering with such acquisitions whenever possible.

COS-P1.2



Pursue opportunities for permanent open space dedication for habitat, scenic, or passive recreation benefits as part of future development approvals and major capital improvement projects.

COS-P1.3



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.*

COS-P1.4



Require new projects adjacent to protected open space areas, such as EBRPD lands, to establish buffers on their properties as necessary to minimize conflicts and protect the open space. If conflicts arise between protected open spaces and other uses, prioritize maintaining the viability of the open space functions.*

Actions

COS-A1.1

Convene an annual staff-level meeting with involved agencies (e.g., East Contra Costa County Habitat Conservancy, EBRPD), land trusts, and conservation groups to review current and planned efforts to protect and maintain open space.



See the Land Use Element for additional policies and actions related to the Urban Limit Line and open space uses.

AGRICULTURAL RESOURCES AND WORKING LANDS

Agricultural Resource Areas

There are approximately 254,500 acres of agricultural land mapped by the State in Contra Costa County, most of it in the unincorporated area. The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) maps land by agricultural production potential using the following categories:

- **Prime Farmland** has the best combination of physical and chemical features able to sustain long-term agricultural production. Prime Farmland has the soil quality, growing season, and moisture supply needed to produce sustained high yields.
- **Farmland of Statewide Importance** is similar to Prime Farmland, but with minor shortcomings, such as steeper slopes or less ability to store soil moisture.
- **Unique Farmland** consists of lesser-quality soils used for producing the state's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards, as found in some climatic zones in California.
- **Farmland of Local Importance** consists of dryland grains and irrigated pastures not meeting the definitions of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland.

- **Grazing Land** is land on which the existing vegetation is suited to the grazing of livestock.

These categories are used to determine impacts to agricultural land under the California Environmental Quality Act (CEQA). Figure COS-1 shows agricultural land in the unincorporated county as mapped by the FMMP.

In addition to the FMMP, the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) maps prime productive agricultural soils, which are classified as Class 1 and 2 soils and considered the very best soils for farming. As shown in Figure COS-2, these soils are primarily in East County.

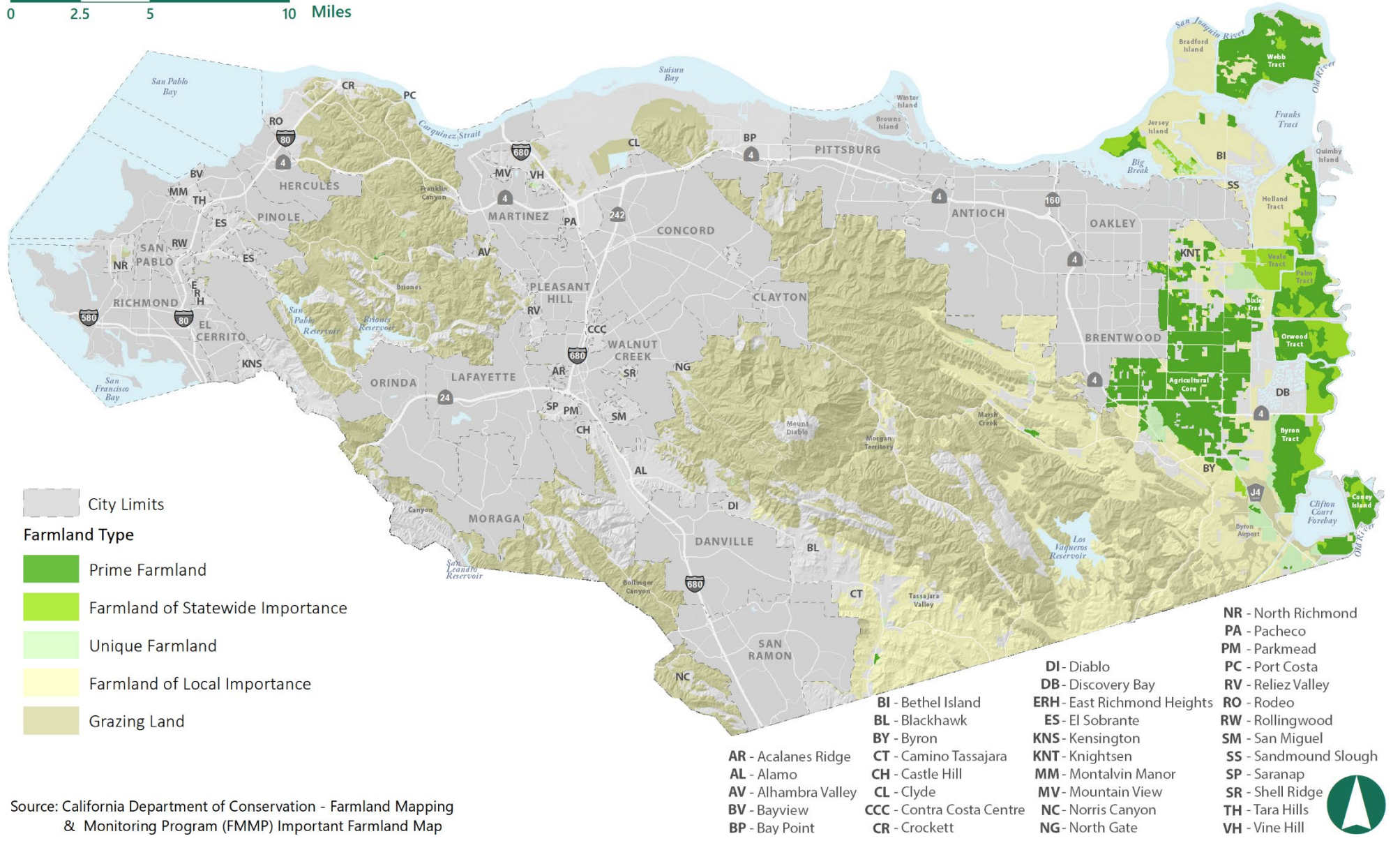


Agricultural land and farmworker labor yield valuable crops in Contra Costa County.

Agricultural lands provide additional benefits outside the traditional crop and agricultural product yield. These lands can provide natural habitats and support ecological functions, while sequestering carbon to support climate stability. Agricultural lands, when managed appropriately, can also serve as strategic wildfire resilience assets by acting as a buffer between fire-prone landscapes and communities.

FIGURE COS-1 AGRICULTURAL LAND

0 2.5 5 10 Miles

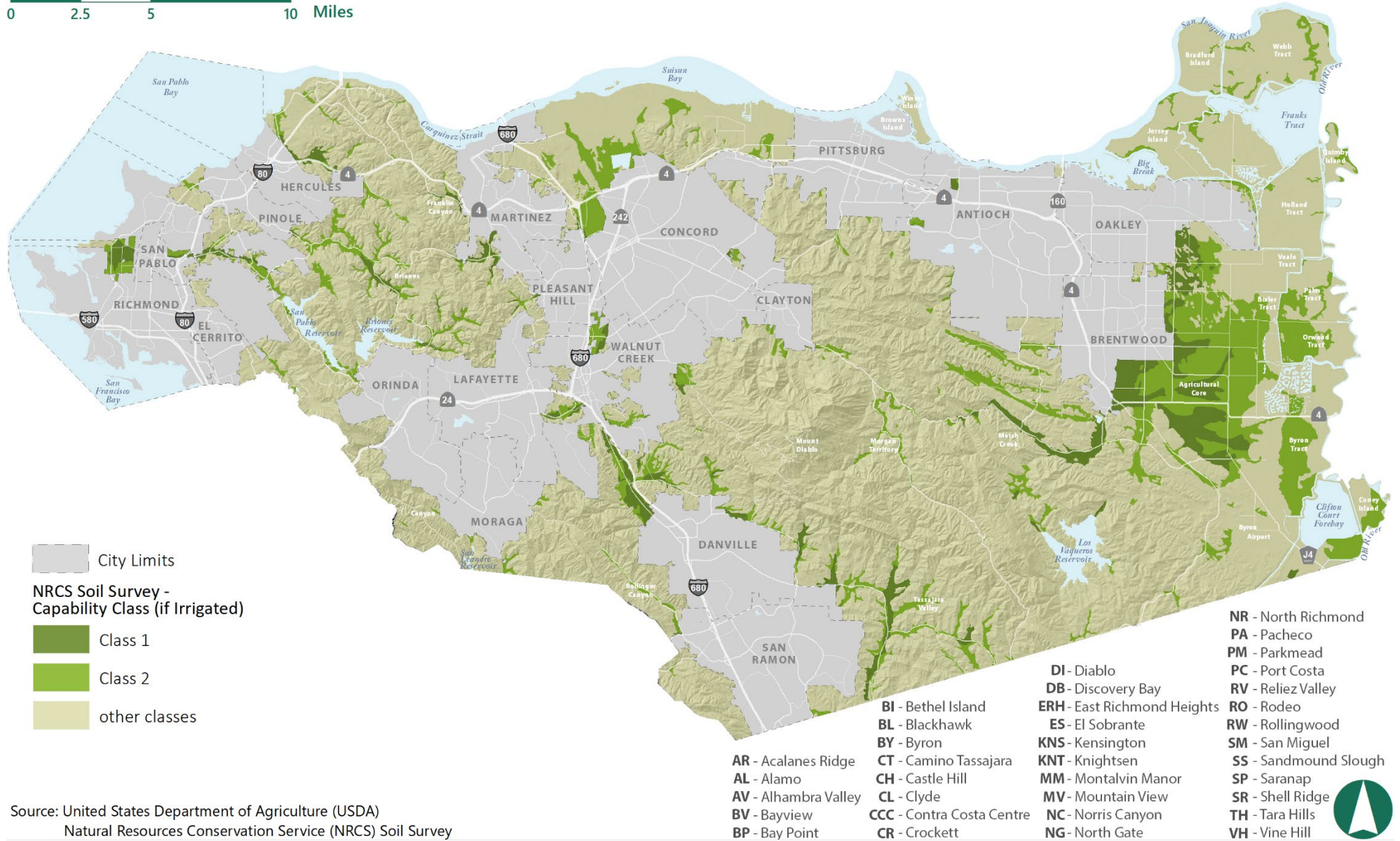


Source: California Department of Conservation - Farmland Mapping & Monitoring Program (FMMP) Important Farmland Map



FIGURE COS-2 PRIME PRODUCTIVE AGRICULTURAL SOILS

0 2.5 5 10 Miles



Source: United States Department of Agriculture (USDA)
Natural Resources Conservation Service (NRCS) Soil Survey



The County realizes the multiple benefits of agriculture and has implemented various programs and regulations to support agricultural land conservation. These include the Agricultural Land Conservation Ordinance, which implements the Williamson Act by allowing property owners to receive a reduced property tax rate in exchange for keeping land in agricultural production, and the Right-to-Farm Ordinance, which protects farms from nuisance complaints. The County also promotes integrated pest management (IPM) strategies to support healthy crops while reducing use of harmful chemicals and associated impacts to the environment.




Grazing goats can eliminate weeds and reduce wildfire risks as an IPM strategy. Photo credit: Contra Costa Health Integrated Pest Management

Goal COS-2

A thriving and resilient agricultural sector based on resource conservation and sustainability practices.

Policies

- COS-P2.1**  Preserve large, contiguous areas of the county for agricultural production. Prohibit projects that would lead to fragmentation of agricultural areas.*

- COS-P2.2** Preserve and protect productive agricultural land from conversion to urban uses, especially land designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland on the Important Farmland Map prepared by the California Department of Conservation; land containing Class 1 or Class 2 soils; and land designated Agricultural Core.*

- COS-P2.3** Require a 40-acre-minimum parcel size for subdivisions of prime productive agricultural land (i.e., Class 1 and Class 2 soils).



COS-P2.4 

Require new projects adjacent to agriculture to establish buffers on their properties as necessary to minimize conflicts and protect agriculture.*

COS-P2.5 

When resolving conflicts between agricultural uses and urban uses, prioritize maintaining the viability of the agricultural uses.

COS-P2.6 

Require deed disclosures for new residential development in or adjacent to areas designated or zoned for agricultural use. The disclosures must explain the potential disturbances associated with agricultural operations (e.g., dust, noise, odors, and use of pesticides) and reference the Right-to-Farm Ordinance, which protects agricultural operations from nuisance complaints and unreasonable restrictions.*

COS-P2.7 

Encourage owners of qualifying agricultural land to participate in the Williamson Act (Agricultural Preserve) Program.

COS-P2.8 

Support public infrastructure projects and programs that will increase, enhance, and protect agricultural land and its production capabilities.

COS-P2.9  

Coordinate with Byron-Bethany Irrigation District and East Contra Costa Irrigation District to facilitate water conservation, efficient use of agricultural irrigation water, and implementation of emerging water reuse technologies and practices.

COS-P2.10 

Support soil conservation and restoration programs. Encourage agricultural landowners to work with agencies such as the USDA's NRCS and Contra Costa RCD to reduce erosion and soil loss.

COS-P2.11 

Support efforts to protect, maintain, and improve soil health as a carbon sequestration tool.

COS-P2.12  

Partner with the agricultural community and University of California Cooperative Extension (UCCE) to support regenerative agriculture practices that maintain agricultural viability.

COS-P2.13  

Encourage IPM practices that reduce the use of agricultural pesticides and minimize pesticide drift, and discourage farming practices that may expose residents, water resources, and the environment to fine particulates and harmful chemicals.



Actions

COS-A2.1

Review each update of the California Department of Conservation FMMP data and report to the Board of Supervisors on the quantity of land in the county converted to and from agricultural use.

COS-A2.2

Work with the agricultural community, Contra Costa LAFCO, and cities to establish programs and mechanisms to protect agricultural resources, such as preservation agreements, conservation easements, an agricultural soils trust fund, and agricultural mitigation fees.

COS-A2.3

Conduct a study of potential Transfer or Purchase of Development Rights (TDR/PDR) programs to address development pressures and preserve agricultural land. The study should determine:

- (a) Overall feasibility and usefulness toward implementing the County's agricultural preservation goals.
- (b) Specific mechanisms that could be used.
- (c) Geographic areas where these mechanisms could be used.
- (d) Organizational and administrative requirements.
- (e) Cost to the County and potential revenue sources.

COS-A2.4



Amend County Ordinance Code Title 8 – Zoning to include development standards, and possibly adopt accompanying design guidelines, for urban land uses that interface with agricultural uses, addressing, at minimum:

- (a) Setbacks on urban properties to provide a buffer for agricultural uses.
- (b) Location and arrangement of buildings, structures, and uses on urban properties.
- (c) Lighting, fencing, screening, and appropriate landscaping/vegetation.

COS-A2.5

Review the Williamson Act Program to identify potential areas for improvement, such as:

- (a) Expanding the range of allowable uses to include wildlife habitat areas.
- (b) Increasing enforcement of non-compliant properties.
- (c) Ensuring agricultural conservation commitments are adequate to justify inclusion in the Program.
- (d) Creating a mechanism to ensure rezoning of properties no longer under a Williamson Act contract.

See the Land Use Element for additional policies and actions related to agricultural areas and the Health and Safety Element for additional policies related to soil health in support of carbon sequestration.



Agricultural Economy

Contra Costa County's rich soils, climate, and reliable water supplies have allowed generations of farmers to produce an array of outstanding crops. Contra Costa farmers have grown a wide variety of food for the Bay Area and beyond since the Gold Rush, from vast winter wheat fields in the 1880s to sweet corn, stone fruits, vegetables, olives, wine grapes, and beef today. East County has a long history of agricultural tourism, including U-pick farms going back to the 1970s. The unique combination of world-class growing conditions, proud farming tradition, and proximity to major metropolitan areas makes agriculture one of the county's most important assets.



Peppers are harvested in East Contra Costa County. (Community-submitted photo)

As of 2021, Contra Costa County ranked 36th out of California's 58 counties in total agricultural production, with a \$109.4 million value, despite being 51st in land mass. Cattle and calves, sweet corn, tomatoes, grapes, and cherries are the highest-grossing agricultural yields in the county. Future economic opportunities for Contra Costa County agriculture include:

- Demand for organic products.
- Demand for locally-grown, healthy, and sustainably produced food.
- Potential to expand value-added food processing, manufacturing, co-processing, and co-packing across the county.
- Expanded agricultural tourism.



U-pick farms offer opportunities to experience agriculture firsthand and support the local farming community.

The Contra Costa County Department of Conservation and Development (DCD) and Department of Agriculture, Weights, and Measures seek to promote and protect the county's agricultural industry, crops, and rangelands. The future of the county's agricultural economy is supported by local agriculturalists introducing innovative approaches to farming and seeking creative ways to reintroduce farming culture and recapture earnings.

Goal COS-3
A thriving, sustainable, and competitive agricultural economy.

Policies

COS-P3.1  Support development of public and private infrastructure and services needed to support agriculture.

COS-P3.2   Support efforts to promote and market locally grown and value-added agricultural products.

COS-P3.3  Enable farmers to showcase farm products grown on-site and elsewhere within the county and offer on-site farm experiences, such as culinary classes, farm-to-table meals,

tastings, and special events, while maintaining the character and integrity of the surrounding agricultural landscape.

COS-P3.4  Enable farmers and ranchers to provide small-scale, short-term guest accommodations in a manner that is nondisruptive to the rural setting.

COS-P3.5  Assist the agricultural community through the County's economic development programs.

COS-P3.6  Support the Contra Costa RCD in carrying out its mission to assist farmers and ranchers through programs that conserve natural resources and build a strong farming community.

COS-P3.7   Support rural property owners who apply to the Contra Costa LAFCO to detach agricultural land outside the Urban Limit Line (ULL) from special districts that provide urban services.

COS-P3.8  Allow farmworker and farm family housing in agricultural areas to meet the needs of locally employed seasonal and permanent farmworkers.



Actions

COS-A3.1

Establish a mitigation program to offset conversion of working lands (irrigated and intensively cultivated agricultural lands and rangeland) to nonagricultural uses. The program will define the types of land conversions requiring mitigation, mitigation ratios, acceptable mitigation locations, allowable conservation instruments, and use of in-lieu fees.*

COS-A3.2

Partner with the agricultural community and agencies such as the Delta Protection Commission to obtain funding for design, installation, and ongoing maintenance of proper signage promoting agriculture in the county, including wayfinding signage for agricultural tourism (e.g., U-pick, lodging, food service, winery) uses.

COS-A3.3

Designate a staff position in DCD to serve as a point of contact to guide members of the agricultural community in understanding the processes at DCD, help DCD staff understand the particular needs of the agricultural community, and coordinate with other agencies, such as the Contra Costa RCD, USDA NRCS, UCCE, County Department of Agriculture, Weights, and Measures, and County Environmental Health Division.

COS-A3.4

Work with the agricultural community and UCCE to promote education, training, information-sharing programs, and networking opportunities for farmers, ranchers, and

agricultural agencies to increase agriculture's resilience to climate change hazards.

COS-A3.5

Coordinate with the Contra Costa RCD, USDA NRCS, UCCE, Contra Costa Mosquito and Vector Control District, County Department of Agriculture, Weights, and Measures, and County Environmental Health Division to support sustainable and resilient agricultural operations through vegetation and pest management programs, best management practices, technical assistance related to soil health, funding opportunities for efficient irrigation infrastructure, and information about alternative crop types that are drought-, heat-, and severe weather-resistant.

See the Land Use Element for additional policies and actions on the Urban Limit Line and agricultural lands.

ECOLOGICAL RESOURCES AND NATURAL SYSTEMS

Ecological Resource Areas

Ecological resource areas contain the county's most important biological resources and cultivate biodiversity. The County partners with a variety of public agencies to manage and protect these and other natural resources.

The East Contra Costa Habitat Conservancy oversees implementation of the East Contra Costa County Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP), which provides regional conservation and development guidelines to protect natural resources while improving and streamlining the permit process for projects that will impact endangered species and sensitive habitat. The HCP/NCCP allows local agencies to

authorize endangered species permitting for activities and projects in the region, while providing comprehensive species, wetlands, and ecosystem conservation and contributing to the recovery of endangered species in northern California.


The area covered by the HCP/NCCP totals over 174,000 acres and is shown in Figure COS-3. The HCP/NCCP mainly offsets ecological impacts by conserving and restoring lands in a Preserve System. The Preserve System ultimately will encompass between 23,800 and 30,300 acres that will be acquired and managed to benefit the 28 plant and animal species covered by the HCP/NCCP, as well as the natural communities that they, and hundreds of other species, depend on for habitat. During the first 15 years of HCP/NCCP implementation, 42 properties were acquired for the Preserve System, totaling over 14,400 acres. All but one of the acquisitions were completed in partnership with EBRPD.

In addition to the HCP/NCCP, the Association of Bay Area Governments (ABAG)/Metropolitan Transportation Commission (MTC) have identified Priority Conservation Areas (PCAs) throughout the county and region. These areas, for which there is broad consensus on the need for long-term protection given the ecological resources present and urban development pressures, are eligible for conservation grants through the One Bay Area Grant Program. PCAs in Contra Costa County total over 135,000 acres and are shown on Figure COS-4.

Goal COS-4
Preserved and enhanced ecological resources and wildlife habitat.

Policies

COS-P4.1  Maintain ecologically significant resource areas in their natural state to the greatest extent possible. Limit development in and near these areas to compatible low-intensity uses with adequate provisions to protect sensitive resources, including setbacks around resource areas. Prohibit projects that would lead to fragmentation of ecologically significant resource areas.*

COS-P4.2  Support land conservation and restoration consistent with the HCP/NCCP and discourage development in areas where such conservation is planned, as shown on Figure COS-3. Support actions to preserve land and resources within PCAs mapped by ABAG, as shown on Figure COS-4.

COS-P4.3 Require a biological resources assessment prepared according to State and federal protocols for projects with the potential to impact rare, threatened, endangered, or special-status species or their habitat, and implement appropriate mitigation for identified impacts.*

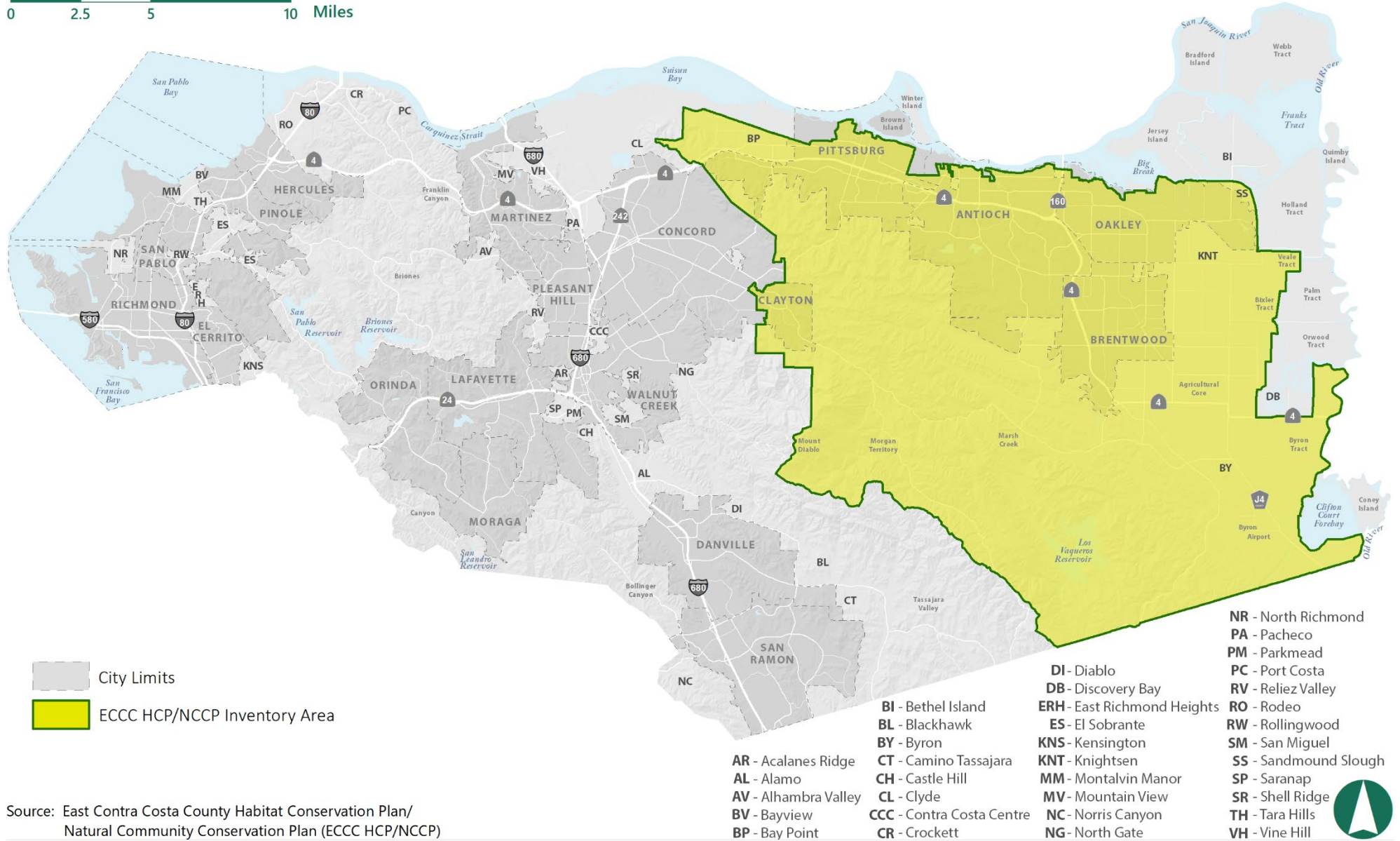
COS-P4.4  Protect habitat and wildlife migration corridors, and support projects that enhance these areas.*

COS-P4.5  Discourage the use of fencing that poses risks to wildlife.*



FIGURE COS-3 EAST CONTRA COSTA COUNTY HABITAT CONSERVATION PLAN/NATURAL COMMUNITY CONSERVATION PLAN AREA

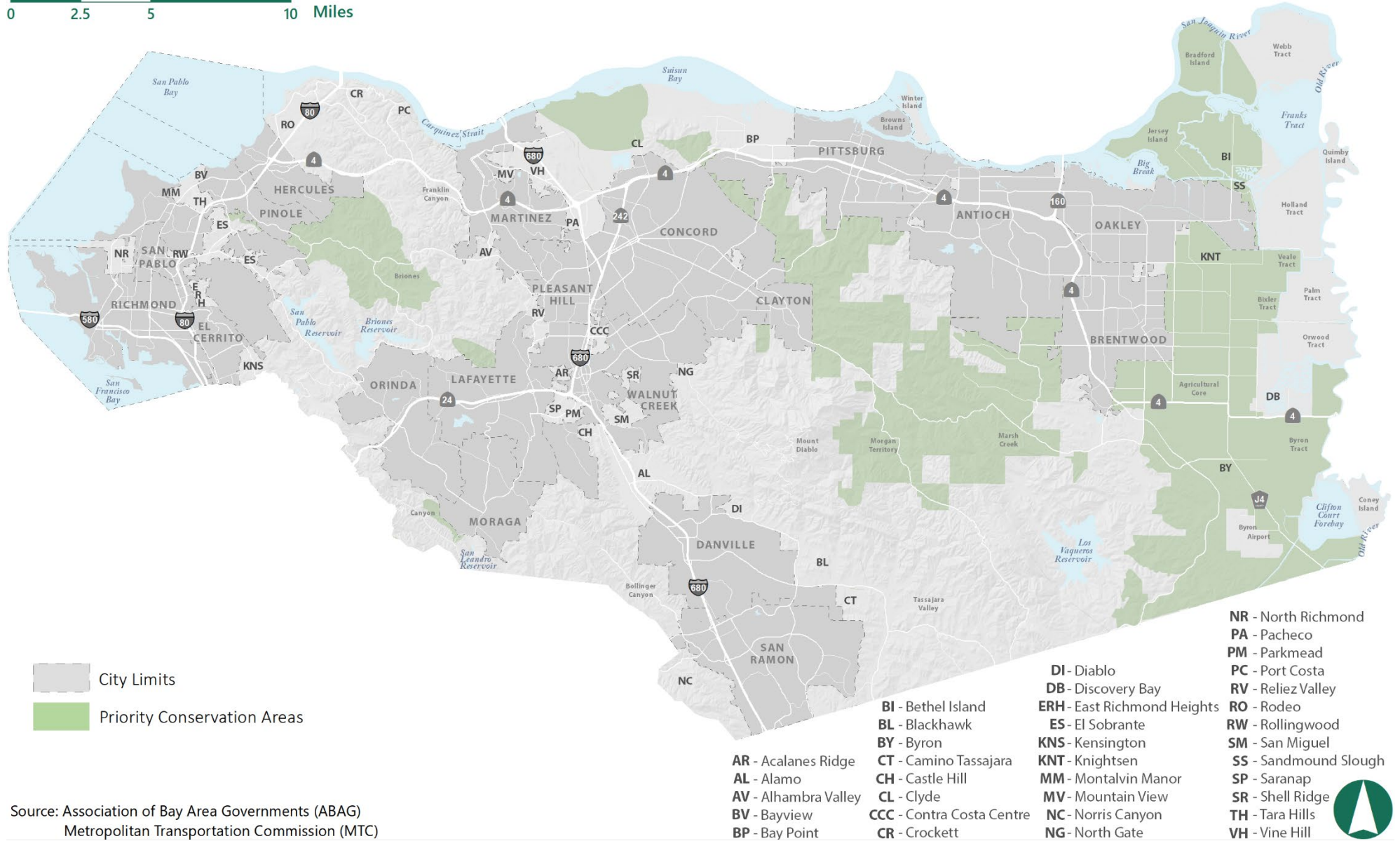
0 2.5 5 10 Miles



Source: East Contra Costa County Habitat Conservation Plan/
 Natural Community Conservation Plan (ECCC HCP/NCCP)

FIGURE COS-4 PRIORITY CONSERVATION AREAS

0 2.5 5 10 Miles



Source: Association of Bay Area Governments (ABAG)
Metropolitan Transportation Commission (MTC)



COS-P4.6

Require appropriately-timed, comprehensive floristic and vegetation surveys prepared according to State and federal protocols when development is proposed on land with potentially suitable habitat for special-status plant species, including areas mapped by the California Native Plant Society as Botanical Priority Protection Areas.*

COS-P4.7

Require avoidance and protection of sensitive ecological resources not approved for disturbance or removal during project entitlement, and require restitution in exceedance of standard mitigation ratios for inadvertent damage to these resources.*

COS-P4.8



Require majority use of native plant species in landscaping for new developments, and require construction practices that avoid spread of invasive plant species by minimizing surface disturbance; seeding and mulching disturbed areas with certified weed-free native mixes; disinfecting/decontaminating equipment; and using native, noninvasive, drought-resistant species in erosion-control plantings.*

COS-P4.9

Support preservation of native and sport fisheries and reestablishment of fisheries in streams wherever possible.

Actions

COS-A4.1

For the portion of the county not covered by the HCP/NCCP, prepare and maintain a similarly detailed inventory of ecologically significant resource areas, including unique natural areas, wetlands, floodplains, riparian resources, and the habitat of rare, threatened, endangered, and other uncommon and protected species.*

COS-A4.2



Amend County Ordinance Code Title 8 – Zoning to include development standards, and possibly adopt accompanying design guidelines, for urban land uses that interface with ecologically significant resource areas and other protected conservation lands, addressing, at minimum:

- (a) Setbacks on urban properties to provide a buffer for resource areas.
- (b) Clustering of development to maximize ecological and conservation benefits.
- (c) Lighting, fencing, screening, and landscaping/vegetation that support, and do not interfere with, wildlife migration and other conservation purposes.*

See the scenic resources section of this Element for policies and actions related to conservation of hillsides and steep slopes.

Creeks, Wetlands, and Riparian Areas

Contra Costa County hosts abundant aquatic habitat through its freshwater and coastal salt marshes, mud flats, inland wetlands, and riparian vegetation. Wetlands, especially marshes scattered along the shoreline, are among the most important habitat resources within the county and have substantial legal and policy protection. They are critical for climate resilience, as they offer flood and storm surge protection during storm events by absorbing excess water and reducing erosion and the height of flooding. Wetlands also intercept water runoff and remove pollutants, improving water quality.



Wetlands in Radke Martinez Regional Shoreline Park provide valuable wildlife habitat along the Carquinez Strait. (Community-submitted photo)

As illustrated on Figure COS-5, many creeks, streams, and other drainages extend throughout the county and ultimately drain into San Francisco Bay, San Pablo Bay, and the Delta. Outside the urbanized parts of the county, creeks and streams tend to be in a natural or mostly undisturbed state,

supporting diverse plant and animal life. The riparian ecosystems along creek banks provide permanent homes and migratory pathways for many species, while also offering recreational opportunities for people to connect with nature. Natural creeks and other freshwater bodies also store water and help to recharge groundwater basins, which increases resiliency to drought conditions. However, many creeks within urbanized areas have been heavily modified to support flood control, often by rerouting them into concrete channels or culverts. Recognizing the importance of creeks in supporting ecological, recreational, and flood-control goals, in 2009 the County adopted an outline of a 50-year plan to convert creeks back to their natural state.

Goal COS-5

Protected and restored natural watercourses, riparian corridors, and wetland areas that improve habitat, water quality, wildlife diversity, stormwater flows, and scenic values.

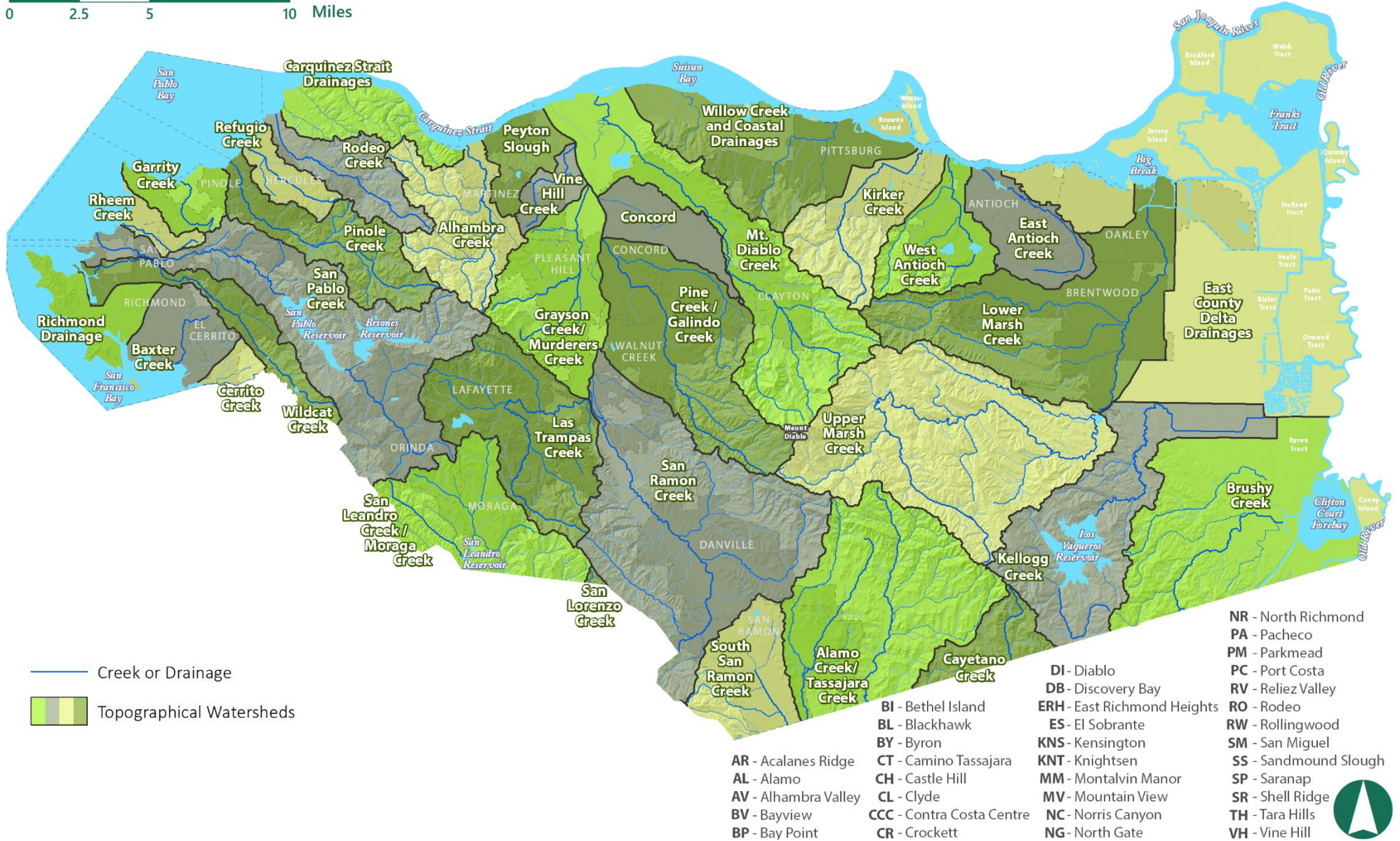
Policies

- COS-P5.1**  
- Support protection, restoration, and enhancement of creeks, wetlands, marshes, sloughs, and tidelands, and emphasize the role of these features in climate change resilience, air and water quality, and wildlife habitat.



FIGURE COS-5 WATERSHEDS, WATERBODIES, CREEKS, AND RIVERS

0 2.5 5 10 Miles





COS-P5.2 

Require new public infrastructure and private development projects to preserve, and whenever possible enhance, natural watercourses, floodplains, and riparian habitat.*

COS-P5.3 

Require avoidance, minimization, and/or compensatory mitigation for development that would impact a wetland, wetland species, or adjacent upland habitat areas. Where feasible, compensation shall be in-kind (i.e., the same type of habitat), provided on-site, and based on a ratio that provides a margin of safety reflecting the expected degree of success and accounting for the relative functions and values of the lost and created wetlands.*

COS-P5.4 

Require new buildings and structures on private property be set back at least 75 feet from the edge of any wetland area, unless a peer-reviewed, site-specific evaluation indicates that a different setback is appropriate for protecting the wetland and adjacent upland habitat areas. Allow encroachment into a required wetland setback area only when a parcel would otherwise be rendered unbuildable or impacts have been adequately mitigated.*

COS-P5.5

Acquire deeded development rights to setback areas surrounding wetlands, floodplains, and natural watercourses to ensure preservation of the resource and protect adjacent improvements.*

COS-P5.6 

Require increased setbacks for animal-handling uses whenever necessary to protect natural watercourses, riparian habitat, or erosion-prone soils. Setback increases can be applied to all aspects of the use, such as manure storage areas, and are not limited to buildings and structures.*

COS-P5.7 

Allow encroachments into required setback areas along natural watercourses and wetlands for the purpose of constructing public improvements or public-serving amenities, such as bridges, trails, and nature viewing areas.

COS-P5.8 

Prohibit direct runoff of pollutants and siltation into marsh, creek, and wetland areas from outfalls serving urban development.*

Actions

COS-A5.1 

Inventory wetlands, floodplains, marshlands, and adjacent lands that could potentially support climate adaptation (e.g., through flood management, filtration, or other beneficial ecosystem services) and mitigation (e.g., carbon sequestration).*

COS-A5.2

Amend the County Ordinance Code to include the wetland setback requirement described in Policy COS-P5.4.*



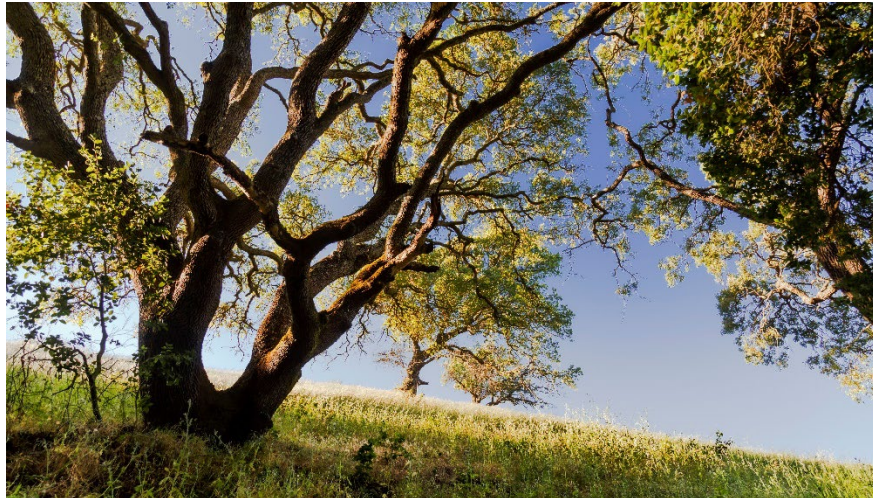
COS-A5.3

Amend the County Ordinance Code to apply the creek setback requirements in Title 9 – Subdivisions to all projects, including those that are not part of a subdivision.*

See the Health and Safety Element for policies and actions about flooding and sea-level rise.

Uplands

The upland areas of Contra Costa County support grasslands, shrublands, woodlands, and forests. These natural communities are important because they provide carbon sequestration, nutrient cycling, forage and homes for wildlife, erosion control, and recreation, while also supporting agriculture and other working lands. Oak trees, an iconic part of the landscape in the county and throughout the state, are recognized by State law with special protections for oak woodlands.



Oak trees dot the natural landscape in upland areas of Contra Costa County. (Community-submitted photo)

Goal COS-6

Preserved and enhanced native upland habitat, including woodlands, grasslands, and rangelands.

Policies

COS-P6.1



Preserve natural woodlands and significant trees, particularly mature native species.*

COS-P6.2



Encourage planting and propagation of native trees throughout the county to enhance the natural landscape, provide shade, sustain wildlife, absorb stormwater, and sequester carbon.

COS-P6.3



Support protection of native trees, especially oaks, in foothill woodlands and agricultural areas by encouraging voluntary installation of fencing around individuals or clusters of trees to prevent grazing and promoting replanting of native species.

COS-P6.4



Encourage removal of invasive, non-native tree species, especially those known to pose threats to public safety.



COS-P6.5

Encourage revegetation of native species in areas that were previously converted for agriculture but are no longer in production.

Actions

COS-A6.1

Update County Ordinance Code Chapter 816-6 – Tree Protection and Preservation, to enhance tree protections and strengthen mitigation requirements/restitution for tree removal.*

COS-A6.2

Develop an Oak Woodland Conservation Program that establishes special mitigation ratios for removal of oak trees, along with specific tree replacement and planting standards to ensure long-term growth and survival. Amend the County Ordinance Code as needed to implement the program.*

WATER RESOURCES

Surface and Groundwater Resources

Supporting the life-sustaining properties of water as a natural resource is a complex challenge. Water is dynamic, contested, and increasingly scarce. Maintaining the quality of the county's water supply requires protecting surface water and groundwater from the impacts of past and future development. An important tool for protecting water quality is the National Pollutant Discharge Elimination System (NPDES), which requires a permit to

discharge water or wastewater into surface waters. The County supports the efforts of outside regulatory agencies who protect water quality, and actively monitors regional, State, and federal programs that could affect water quality and water supply safety in the county.

As discussed in the Public Facilities and Services Element, there are two major water service providers in the county that rely on surface water resources from the Mokelumne River and Delta: EBMUD and CCWD. These utilities own the watershed lands around their storage reservoirs, as shown in Figure COS-6, and they actively manage the land to protect the quality of the East Bay's water supply.

Figure COS-7 shows Census tract rankings for impaired waterbodies in the county. This data ranks Census tracts based on the number of pollutants found in all waterbodies within the Census tract that are designated as impaired relative to Census tracts in the rest of the state. As shown in the figure, the highest rankings for impaired waterbodies are in East County where pesticide use from agricultural operations harms water quality. Some Census tracts on the north and west sides of the county also rank high, mainly due to discharge from industrial uses.

State data also demonstrates threats to groundwater quality, as shown in Figure COS-8. This data ranks Census tracts based on activities that pose threats to groundwater quality, such as uses involving hazardous chemicals, gasoline or diesel, solvents, heavy metals, or pesticides. These threats are most significant along the Northern Waterfront where there is a high concentration of heavy industrial uses.

The Sustainable Groundwater Management Act (SGMA), enacted in 2015, provides a framework of priorities and requirements to facilitate sustainable groundwater management throughout the state. Groundwater Sustainability Agencies (GSAs) and other local public agencies help manage groundwater in high- and medium-priority groundwater basins to ensure it is maintained



FIGURE COS-6 UTILITY DISTRICT WATERSHED LANDS

0 2.5 5 10 Miles

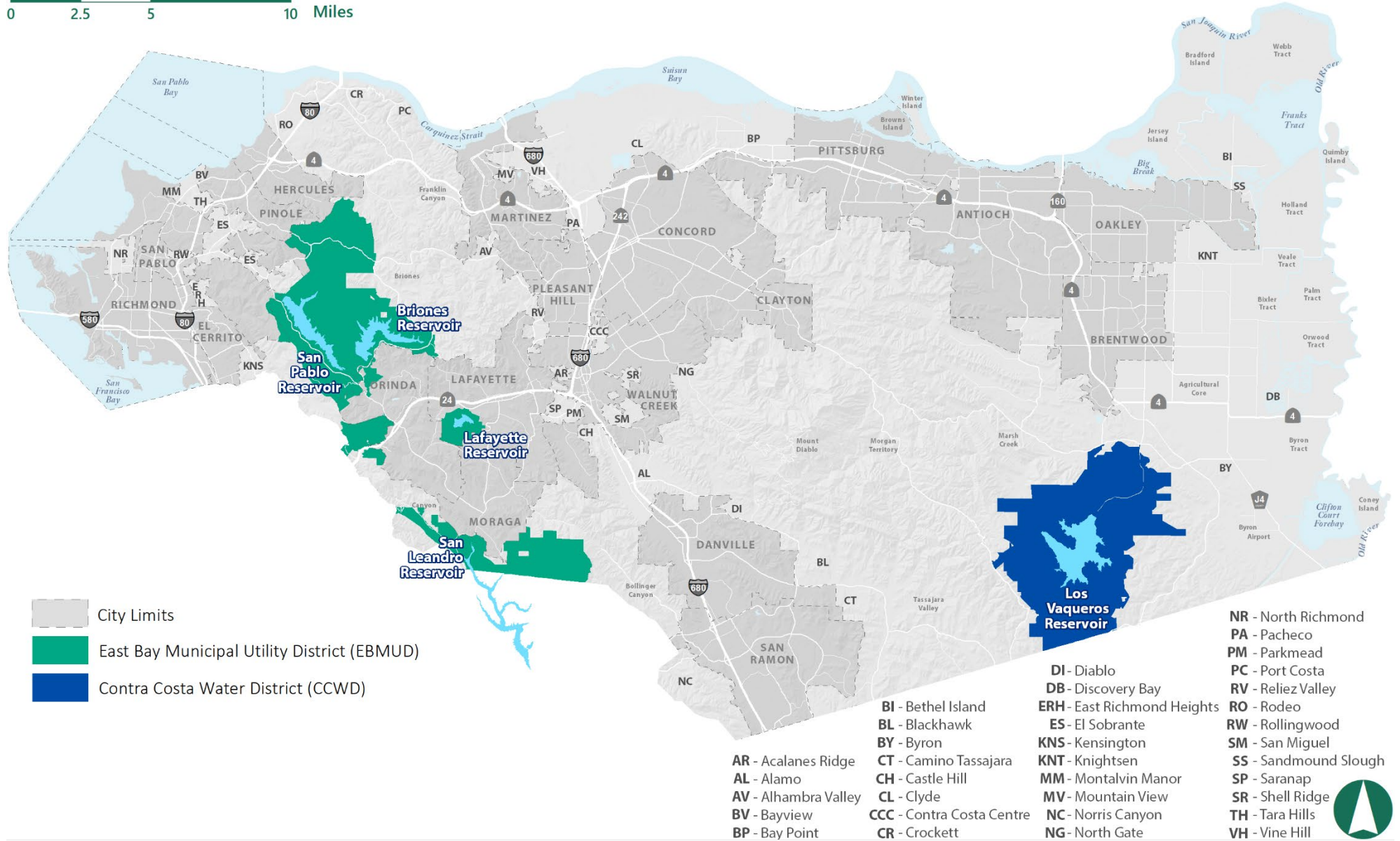
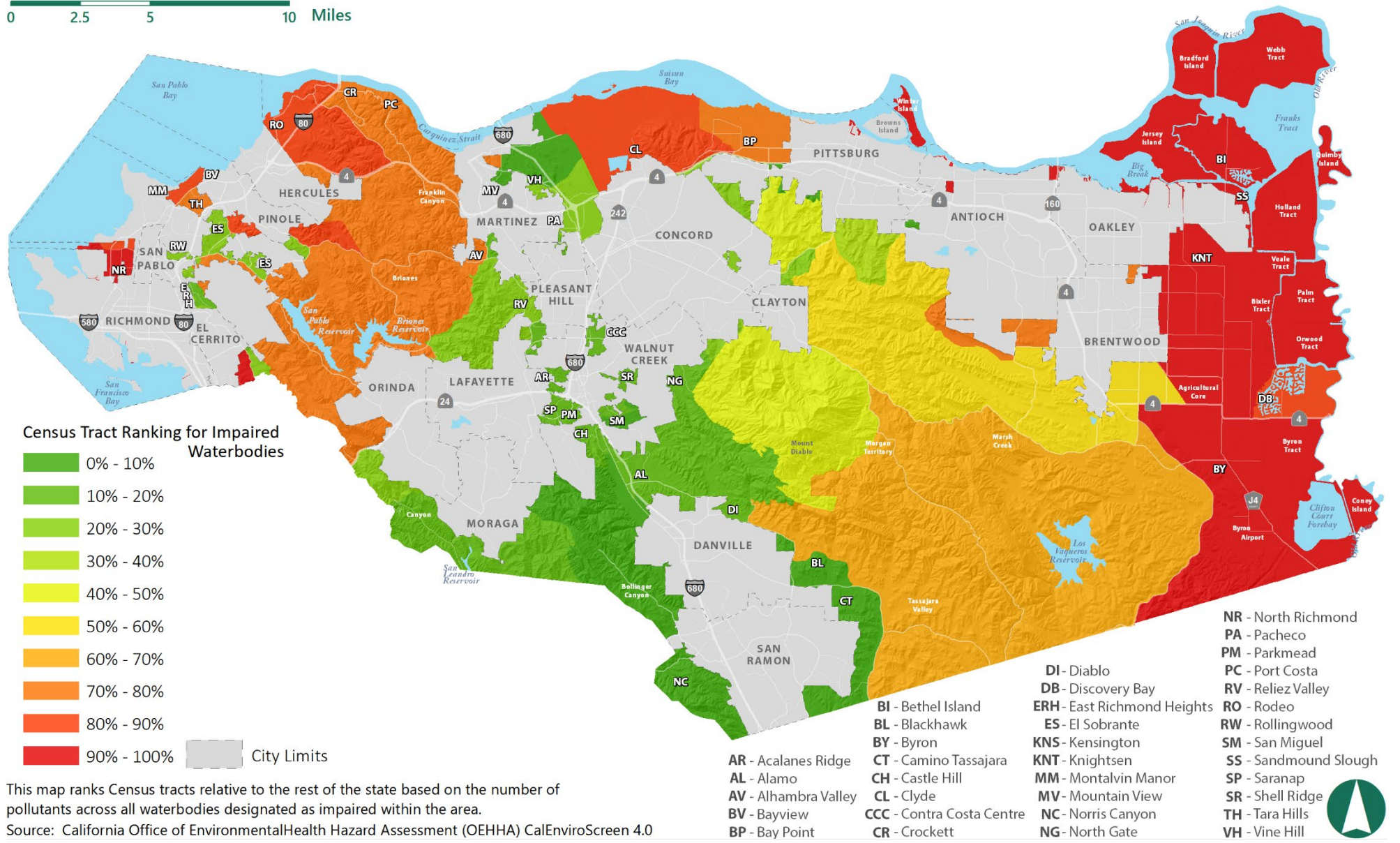


FIGURE COS-7 IMPAIRED WATERBODIES RANKINGS RELATIVE TO THE STATE

0 2.5 5 10 Miles

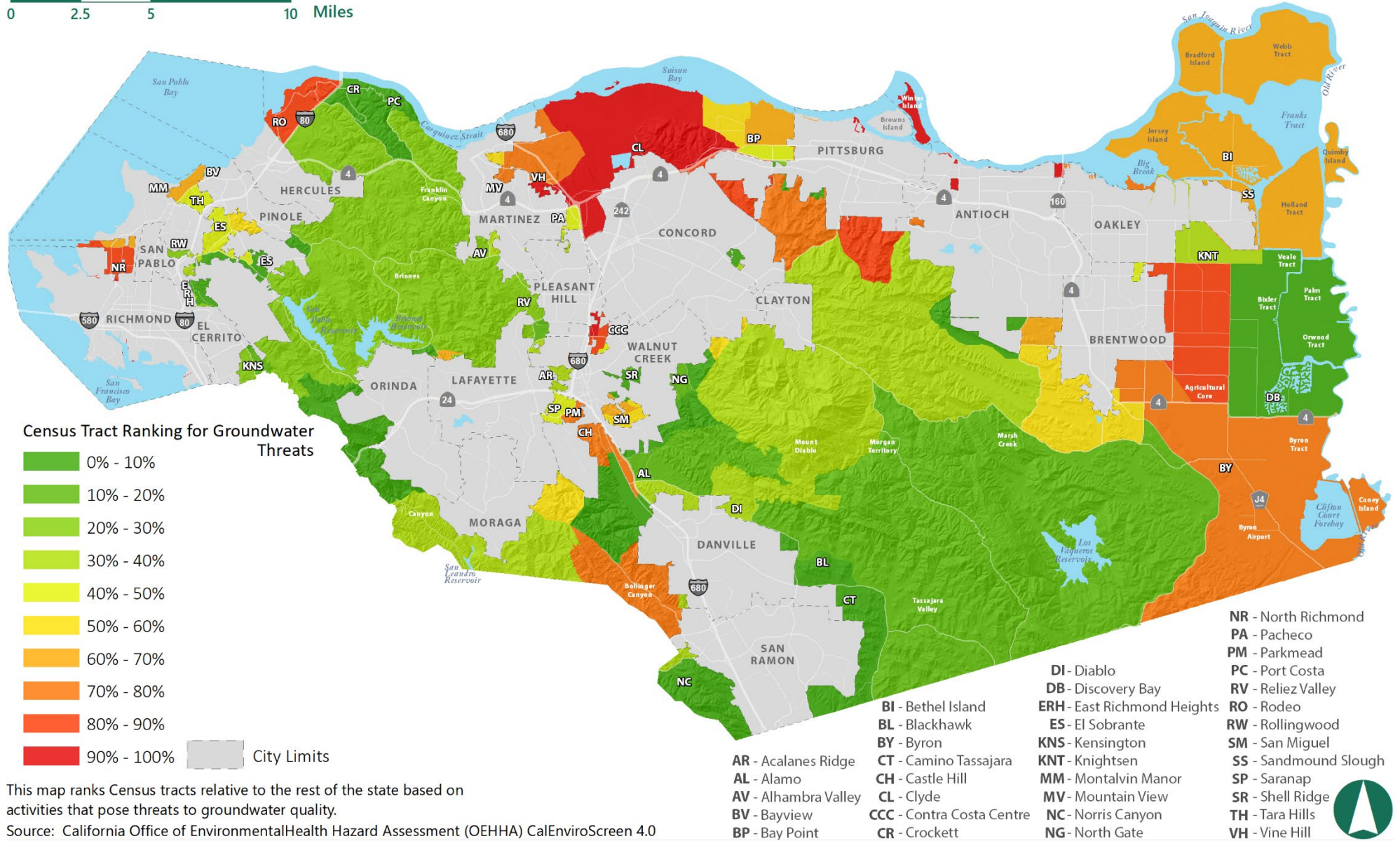


This map ranks Census tracts relative to the rest of the state based on the number of pollutants across all waterbodies designated as impaired within the area.
 Source: California Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen 4.0



FIGURE COS-8 GROUNDWATER THREAT RANKINGS RELATIVE TO THE STATE

0 2.5 5 10 Miles



This map ranks Census tracts relative to the rest of the state based on activities that pose threats to groundwater quality.
 Source: California Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen 4.0

within its sustainable yield. Groundwater Sustainability Plans (GSPs) are adopted and implemented by GSAs and other agencies to be consistent with the SGMA.

Groundwater basins in the county are shown in Figure COS-9. Three of these are medium-priority: East Contra Costa, East Bay Plain, and Livermore Valley. In eastern Contra Costa County, seven local agencies, including the County, are GSAs. These agencies signed a memorandum of understanding agreeing to prepare a single GSP for the East Contra Costa Subbasin, which was adopted by the County in December 2021.


Goal COS-7
Sustainable surface and groundwater resource management.


Policies


COS-P7.1  Require new development to reduce potable water consumption through use of water-efficient devices and technology, drought-tolerant landscaping strategies, and recycled water, where available.*

COS-P7.2  Partner with water and wastewater service providers, GSAs, irrigation districts, and private well owners to increase participation in water conservation programs countywide.

COS-P7.3
Consult applicable GSPs and local GSAs before making land use decisions that could impact groundwater resources.*

COS-P7.4  For projects in areas without a water service provider, require proof of adequate on-site groundwater during the development review process. In addition to requiring compliance with the County's well regulations related to water quality and flow rate, require documentation that the proposed project will not have a significant cumulative impact on the aquifer or negatively affect development that already relies on the same groundwater supply.*

COS-P7.5  Prohibit new development that would create or significantly aggravate groundwater overdraft conditions, land subsidence, or other "undesirable results," as defined in Section 354.26 of the California Water Code.*

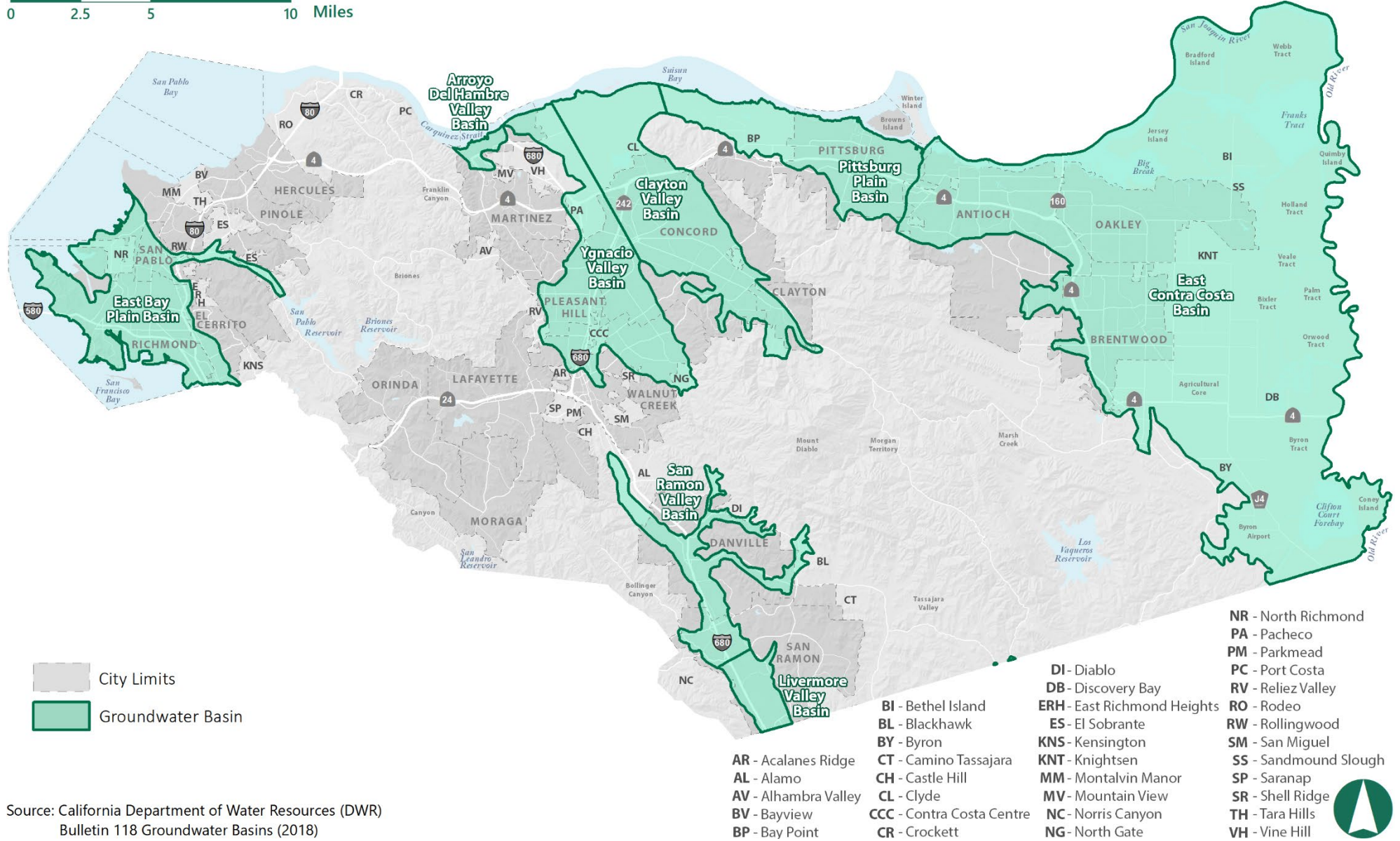
COS-P7.6  Support multipurpose water storage options that incorporate water supply, flood control, surface and groundwater storage, groundwater management, and ecosystem components.

COS-P7.7  Require landscaping for new development to be drought-tolerant, filter and retain runoff, and support flood management and groundwater recharge.*



FIGURE COS-9 GROUNDWATER BASINS

0 2.5 5 10 Miles



Source: California Department of Water Resources (DWR)
 Bulletin 118 Groundwater Basins (2018)





COS-P7.8  
Promote installation of drought-tolerant green infrastructure, including street trees, in landscaped public areas.


COS-P7.9 
Support wastewater reclamation and reuse programs that maximize use of recycled water.

COS-P7.10  
Support programs and activities conducted by community watershed groups and volunteers that increase public awareness and encourage stewardship of water resources.

Actions

COS-A7.1
Update County Ordinance Code Chapter 414-4, Water Supply, to be consistent with adopted GSPs.*

COS-A7.2  
For areas that are not covered by an adopted GSP, amend the County Ordinance Code to include sustainability indicators, defined by the SGMA, as a guide for development to maintain and protect the quality and quantity of groundwater supplies within the county.*



COS-A7.3 
Evaluate the feasibility and necessity of amending the County Ordinance Code to promote rainwater harvesting, installation of dual plumbing, and water reuse.

COS-A7.4 
Publish information on the DCD website about alternative sources of water for irrigation and other non-potable needs, such as greywater, rainwater, air conditioning condensation, and foundation drainage.

Goal COS-8

Protected quality of surface water and groundwater resources.

Policies

COS-P8.1  
Protect public water supplies by denying applications for projects that would introduce significant new pollution sources in groundwater basins and watersheds feeding major reservoirs, and support efforts to acquire and permanently protect reservoir watersheds.*

COS-P8.2  
Coordinate with other agencies to control point and non-point sources of water pollution and maintain water quality standards.*

COS-P8.3  
Support development and implementation of a long-term, area-wide integrated vegetation management program to control invasive weeds in a way that reduces pesticide use and preserves water quality.



COS-P8.4



Require new development to retain natural vegetation and topography whenever feasible and require projects involving erosion-inducing activities to use best management practices to minimize erosion.*

COS-P8.5



Require groundwater monitoring programs for all large-scale commercial and industrial facilities that use wells and prohibit discharge of hazardous materials through injection wells.*

COS-P8.6



Support ongoing remediation of the Mount Diablo Mercury Mine.

See the Public Facilities Element for policies and actions on water and wastewater service, drainage, and stormwater management. See the Health and Safety Element for policies and actions on flood control.

Delta and Shoreline Resources

Encompassing 738,000 acres, the Delta is the largest estuary on the West Coast and the confluence of California’s two longest rivers: the Sacramento River and San Joaquin River. East County is home to a large portion of the western Delta where unique plant and animal communities flourish. The Delta is one of the county’s greatest natural resources, and its health is critical to the county’s physical, societal, and economic well-being.

A healthy Delta requires sufficient high-quality water to provide habitat for fish and other native aquatic, terrestrial, and avian species, both migratory and year-round. The Delta needs proper management, including through

partnerships between federal, State, and local agencies, to protect people and land with strong levees, comprehensive emergency response, and fresh water. The Delta also promotes the economic health of the region through recreation, industrial and maritime commerce, and agriculture.

The Delta provides a portion of the water supply for 30 million people and over 6 million acres of agriculture. However, the Delta’s health has declined in recent decades due to wetland loss, diversions of water for export to other regions, increased salinity from diversions and drought, pollution from urban run-off and agricultural pesticide use, and invasive species, which threatens our health, safety, and welfare. Without continued improvements to the ecosystem through conservation and restoration efforts and sustainable land use practices, the Delta is at risk of further decline. Understanding this need, the County adopted its Delta Water Platform in 2014 to guide decisions, actions, and advocacy in a way that supports the Delta’s health and sustainability.



The Delta is an extensive network of waterways stretching from East Contra Costa County to Sacramento and Stockton. (Credit: California Department of Water Resources)

Goal COS-9

Protected, preserved, and enhanced scenic quality, recreational value, and natural resources of the San Francisco Bay/Sacramento-San Joaquin Delta estuary system and shoreline.

Policies

COS-P9.1

Advocate for increased freshwater flow into, through, and from the Delta into San Francisco Bay, and support other efforts to protect and improve Delta water quality.

COS-P9.2



Support continued maintenance and improvement of Delta levees to protect water quality, ecosystems, agricultural land, and at-risk communities.

COS-P9.3

Oppose all efforts to construct an isolated conveyance (e.g., peripheral canal, tunnel) or any other water diversion system that reduces Delta water flows unless and until it can be conclusively demonstrated that such a system would protect, preserve, and enhance water quality and fisheries of the San Francisco Bay/Delta estuary system.

COS-P9.4



Plan for land uses along shorelines that do not pose a threat to Bay or Delta resources, including water quality and shoreline and marshland habitats.*

COS-P9.5



Support efforts to expand and enhance public access to the Bay shoreline and Delta.

COS-P9.6

Prohibit private development on tule islands, sand dunes, and levee remnants.

COS-P9.7

Evaluate cumulative impacts on boating safety when reviewing applications for new or expanded marinas and docks.

COS-P9.8

Require design excellence for new development along Bay and Delta waterways to enhance the visual quality of these areas.

Actions

COS-A9.1



Amend County Ordinance Code Title 8 – Zoning to incorporate the following requirements for new or expanded marinas and docks:

- (a) Adequate channel width and depth, as defined by the State Harbors and Navigation Code.
- (b) Adequate public fire protection services.
- (c) Adequate public vehicular access.
- (d) Adequate supply of potable water.
- (e) Adequate on-site facilities for sewage and solid waste disposal.
- (f) Compatibility with nearby agricultural uses.
- (g) Compatibility with nearby conservation/habitat lands.
- (h) Designed to avoid inundation from projected sea-level rise, as shown on Figures HS-6 through HS-9 (Sea-Level Rise Projection Maps) in the Health and Safety Element.*

HISTORIC AND CULTURAL RESOURCES

Archaeological and Historic Resources

Although the Spanish explored Contra Costa County as early as 1772, significant European settlements were not established until the nineteenth century. In 1822, the newly independent Mexican government began issuing land grants, called ranchos, to its citizens in California. Sixteen ranchos existed in what is now Contra Costa County, and most of the land was used for grazing or growing wheat. One rancho was later purchased by a settler named John Marsh in 1837. It became known as Marsh's Landing, near present day Antioch, and grew into an important commercial center along the San Joaquin River during the California Gold Rush. The success of Marsh's Landing encouraged other American immigrants to purchase land in the area, and permanent communities began to take shape. Following the Gold Rush, agriculture was the economic driver in the region, boosted by the


Southern Pacific Railroad's expansion into the area in the late nineteenth century.



South of Brentwood, the John Marsh House was built by Dr. Marsh in 1856. (Community-submitted photo)

Industrial development and associated residential development to house workers shaped the western portions of Contra Costa County from the early twentieth century. In 1906, the C&H Sugar Factory was established in Crockett, taking advantage of cargo ship access via the Carquinez Strait. Petroleum refineries were also developed during the late 1800s and early 1900s. World War II brought rapid expansion of industrial development to support war efforts, including the famous Kaiser Richmond Shipyards.

Over centuries, people have immigrated to the region from other cities, states, and countries, and the diverse population forms the unique fabric of modern-day Contra Costa County. This history is represented in the almost



400 historic sites, buildings, and other structures that have been identified in Contra Costa County's Historic Resources Inventory. They range from historic buildings that were part of the early industrialization of the western county, like the C&H Sugar Factory, to historic ranches and homes, like the home of John Muir, which is part of the John Muir National Historic Site in Martinez.

In 2019, the United States Congress established the Sacramento-San Joaquin Delta National Heritage Area (NHA), which runs from the east side of San Pablo Bay through the Carquinez Strait to the Delta. The Delta NHA is recognized as a cohesive, nationally significant landscape arising from patterns of human activity shaped by the Delta's geography. The Delta Protection Commission is drafting a Management Plan to promote historic preservation, cultural conservation, education and interpretation, development of recreational assets, nature conservation, tourism, and economic development throughout the Delta NHA. The draft Management Plan will be submitted for review and approval by the United States Department of the Interior in the first quarter of 2024.

Other State and federal laws and programs help to protect historic and archaeological resources, including the California Historical Building Code, which preserves California's architectural heritage by ensuring historic buildings are maintained and rehabilitated in accordance with historically sensitive construction techniques. In addition, the Mills Act, enacted in 1976, provides a property tax incentive to owners of qualified, owner-occupied, historical properties to maintain and preserve the historic property in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The National Historic Preservation Act coordinates public and private efforts to identify, evaluate, and protect historic and archaeological resources across the nation. The Act authorized the National Register of Historic Places, which lists districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Goal COS-10

Archaeological, cultural, and historic resources that are identified and preserved.

Policies

COS-P10.1

Prioritize preservation and adaptive reuse of buildings, sites, and areas having identifiable archaeological, cultural, or historic significance. Require new construction and renovation projects in historic areas to incorporate compatible and high-quality design that protects the overall historic integrity of the area and adjacent historic resources.*

COS-P10.2

Encourage sensitive restoration and adaptive reuse of historic resources following the Secretary of the Interior's Standards for the Treatment of Historic Properties, including additions and alterations to buildings that do not diminish historic integrity.

COS-P10.3

Encourage owners of historic properties to make use of the State of California Historical Building Code to protect and rehabilitate historic resources.



COS-P10.4

Encourage owners of eligible historic properties to apply for State and federal designation as historic properties and participate in tax incentive programs, such as allowed under the Mills Act, for historic preservation.

COS-P10.5

When a project involves a resource that is listed in the County's Historic Resources Inventory, or as otherwise necessitated by the CEQA process, require applicants to engage a qualified consultant to prepare an evaluation of potential and previously identified archaeological, cultural, and historic resources that may be present on the project site.*

COS-P10.6

Upon discovery of significant historic or prehistoric archaeological artifacts or fossils during project construction, require ground-disturbing activities to halt within a 50-foot radius of the find until its significance can be determined by a qualified historian, archaeologist, or paleontologist and appropriate protection and preservation measures developed.*

COS-P10.7

Require significant historic, archaeological, and paleontological resources to be either preserved onsite or adequately documented as a condition of removal.*

COS-P10.8

Emphasize native people, immigrant populations, and the environmental and cultural heritage of the region as

significant themes related to historic preservation. Consider natural, agricultural, ranching, mining, commercial, industrial, residential, political, transportation, recreation, education, maritime, and military themes when evaluating the significance of historic resources.

COS-P10.9

Ensure new cultural/historic resource evaluations consider potential social and cultural significance of resources in addition to architectural significance.

COS-P10.10

Coordinate with cities and special districts to identify and preserve archaeological, cultural, and historic resources countywide.


COS-P10.11

Partner with other agencies, culturally affiliated tribes, private entities, and nonprofit organizations to establish programs and funding mechanisms to preserve, restore, and enhance cultural, historic, and archaeological sites.

Actions

COS-A10.1

Beginning in 2024, then every five years thereafter, review and update the County's Historic Resources Inventory and Archaeological Sensitivity Map in consultation with culturally affiliated tribes to ensure these remain useful tools for evaluating potential cultural resources impacts and guiding preservation efforts. As part of the 2024 update to the Historic Resources Inventory, create a map of the listed historic



resources, and update the map upon each update to the Historic Resources Inventory. Ensure tribal cultural resources identified through these updates remain confidential.

COS-A10.2

Evaluate and implement one or more measures to protect and preserve historic and cultural resources, such as a historic and cultural resources ordinance, overlay district, and/or design guidelines.

COS-A10.3

Prepare a historic context statement that provides necessary background information about historic, archaeological, and cultural resources and a framework for identifying and evaluating historic resources. The context statement should include the overarching significance themes described in Policy COS-P10.8.

COS-A10.4

Partner with the Delta Protection Commission to support preparation and implementation of the management plan for the Delta NHA.

Tribal Communities

Contra Costa County is in an area where traditional territories of three Native American tribal communities – the Bay Miwok, Northern Valley Yokuts, and Ohlone – converged.

The Bay Miwok inhabited the inner Coast Range, with territory stretching through eastern Contra Costa County, from Mount Diablo into the Delta. The

Bay Miwok were politically organized by tribelet, which consisted of one or more villages and camps within a defined territory.

The Northern Valley Yokuts are the historical occupants of the central and northern San Joaquin Valley, and their territory extended into eastern Contra Costa County. Their main settlements were built atop low mounds on or near the banks of large watercourses for protection against flooding. Each subtribe was autonomous with a headman, and populations averaged around 300 individuals.

The territory of the Ohlone people extended along the coast from the Golden Gate south to just below Carmel, as well as along several inland valleys that led from the coastline. The Ohlone were also politically organized by tribelet, with each having a designated territory.

All of these tribal communities were primarily hunter-gatherers; they hunted animals like mule deer, tule elk, pronged antelope, mountain lions, whales, and waterfowl. They would travel seasonally into the foothills or plains to gather specific plant resources, such as acorns, buckeye nuts, hazelnuts, and pine nuts, as well as seeds, roots, and berries. These and other resources likely supported hundreds of individual villages throughout what is now Contra Costa County.

Despite the violence and displacement that accompanied European and Mexican settlement of this area and decimated indigenous communities, the indigenous inhabitants of the land are still present. Today, there are several Ohlone nations in Contra Costa, Alameda, Solano, Napa, and San Joaquin Counties, each with its own culture and language, including the Lisjan (Ohlone), Karkin (Ohlone), Bay Miwok, Plains Miwok, Delta Yokut, and Napian (Patwin).



This rich tribal history and living tribal culture are reflected in a range of tribal cultural resources throughout the county. Tribal cultural resources often are less tangible than an object or a site itself. For example, sometimes the importance is tied to views of or access to a sacred site. Therefore, consultation with culturally affiliated Native American tribes is key to identifying tribal cultural resources, as required by Assembly Bill 52.

CEQA requires that local agencies evaluate and mitigate to the extent feasible a project's potential impacts to tribal cultural resources. In addition, Section 7050.5 of the California Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the County Coroner can determine whether the remains are those of a Native American. If the remains are determined to be Native American, the Coroner must contact the California Native American Heritage Commission (NAHC) to determine appropriate treatment (as prescribed in Public Resources Code Section 5097 et seq.). Construction or excavation activity must remain stopped until lawful removal of the remains for reinterment or cremation.

Pursuant to Senate Bill 18, the County notified and consulted with local tribes throughout the General Plan update process. The policies and actions in this section reflect that consultation and commit the County to continuing a collaborative relationship through implementation of this General Plan.

Goal COS-11

Robust tribal collaboration to preserve, restore, and enhance tribal cultural resources.

Policies

COS-P11.1

Respect and protect tribal cultural resources, including historic, cultural, and sacred sites; cultural landscapes; views of or access to resources; and objects with cultural value to California Native American tribes.*

COS-P11.2

Establish and maintain collaborative relationships with local Native American tribal representatives to facilitate tribal consultation and preservation of tribal cultural resources.*

COS-P11.3

Consult with culturally affiliated tribes on General Plan and Specific Plan amendments with potential to impact tribal cultural resources. If an amendment redesignates a tribal cultural resource site for open space purposes, evaluate the appropriateness of developing a treatment and management plan for tribal cultural resources in the affected area.*

COS-P11.4

Consult with culturally affiliated tribes to identify and appropriately address tribal cultural resources through the discretionary development review process.*

COS-P11.5

Consult with culturally affiliated tribes to assess the sensitivity of sites and protect recorded and unrecorded tribal cultural resources.*



COS-P11.6

Encourage voluntary landowner efforts to protect tribal cultural resources.

COS-P11.7

Support tribal acquisition of conservation easements on terms mutually satisfactory to the tribe and landowner for purposes of protecting tribal cultural resources.

COS-P11.8

Encourage special districts, such as EBRPD, to consult with culturally affiliated tribes when pursuing land acquisitions for recreation or other public purposes to ensure tribal access to tribal cultural resources.

COS-P11.9

Avoid impacts of development on Native American archaeological resources and tribal cultural resources whenever possible. When impacts cannot be avoided, mitigate to the maximum feasible extent.*

COS-P11.10

Consult with culturally affiliated tribes when developing mitigation measures to avoid or minimize impacts on tribal cultural resources. Mitigation could include, but is not limited to, a cultural resources treatment agreement between the developer and affected tribe(s) that addresses the treatment and disposition of cultural resources and human remains and tribal monitoring during earth-disturbing activities.*

COS-P11.11

Upon discovery of a burial, human remains, or suspected human remains, require immediate halt to ground-disturbing activities such as excavation and grading, protection of the area surrounding the find, notification of the County Coroner, and compliance with the provisions of California Health and Safety Code Section 7050.5, including California Public Resources Code Section 5097.98, if applicable. If human remains are determined to be Native American, require the applicant to consult with the Most Likely Descendants list to determine appropriate treatment, as prescribed in Public Resources Code Section 5097 et seq.*

COS-P11.12

Encourage landowners to relinquish ownership of Native American cultural artifacts found on project sites to the culturally affiliated tribe for proper treatment and disposition.

Actions

COS-A11.1

In consultation with local Native American tribes, prepare informational materials about living Native American culture in the region, the history of Native Americans in what is now Contra Costa County, and how the County's relationship with local Native American tribes has evolved. Make these materials easily accessible to the public, project applicants, and County staff.

COS-A11.2

Work with local Native American tribes to establish programs and secure funding to implement actions aimed at preserving tribal cultural resources.



SCENIC RESOURCES

With its vast open spaces, estuary system, and rolling hills, Contra Costa County encompasses an outstanding variety of scenic natural vistas, water resources, and landscapes. Many of these scenic resources, including the open spaces and Delta, are discussed in earlier sections of this Element. This section focuses on designated scenic routes and scenic ridges, which are described as follows:

- **Scenic routes** are public roadways that pass through picturesque natural landscapes. These roads tend to offer sweeping views of particularly beautiful areas or prominent features, such as valleys and mountain ranges.
- **Scenic ridges** are ridges that contribute to the scenic quality and character of a community or locale. In many areas, visually prominent ridges offer a striking and welcome contrast to the urban environment.



Unobstructed ridgelines are an important component of the county's scenic landscape.

Figure COS-10 shows scenic routes and ridges as designated by the County through this General Plan. The map also includes the only scenic route in the county officially designated by the State, State Route (SR) 24, as well as portions of SR 4, which are eligible for the State designation. The County designates scenic routes and ridges in order to distinguish especially significant natural features within the landscape and maintain their aesthetic quality through policy protections.

Goal COS-12

Protected natural features with high scenic value, such as visual landmarks, major ridges, prominent hillsides, and stands of mature trees.

Policies

COS-P12.1

Deny applications for development that would destroy unique and irreplaceable natural features, such as distinctive rock formations.*

COS-P12.2

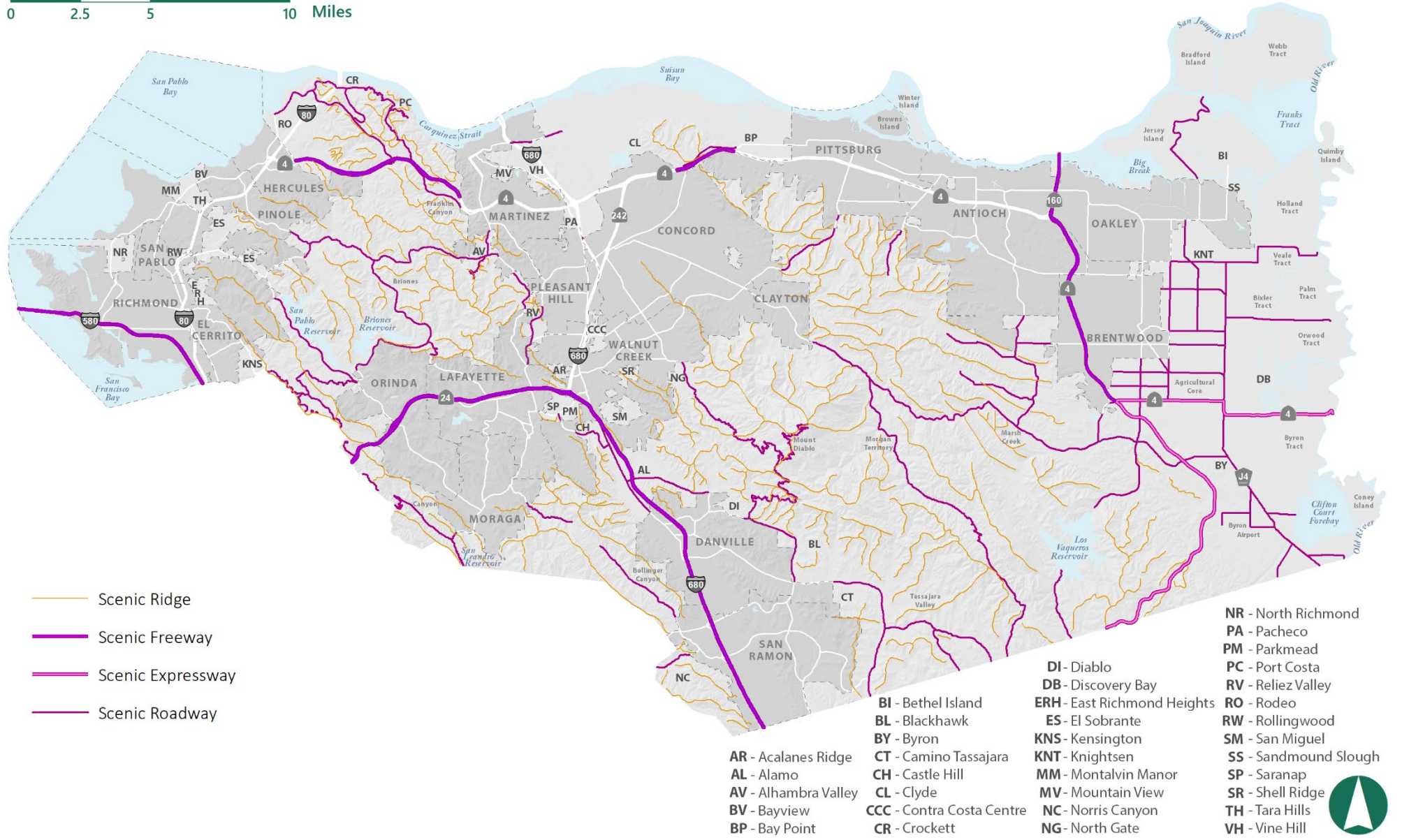
Require redesign of project components that negatively impact viewsheds or the visual quality of the area.*

COS-P12.3

Prohibit development within 100 vertical feet of the top of designated scenic ridges and within 50 vertical feet of other visually prominent ridgelines. Exceptions may be considered

FIGURE COS-10 SCENIC RESOURCES

0 2.5 5 10 Miles



- Scenic Ridge
- Scenic Freeway
- Scenic Expressway
- Scenic Roadway

- AR** - Acalanes Ridge
- AL** - Alamo
- AV** - Alhambra Valley
- BV** - Bayview
- BP** - Bay Point
- BI** - Bethel Island
- BL** - Blackhawk
- BY** - Byron
- CT** - Camino Tassajara
- CH** - Castle Hill
- CL** - Clyde
- CCC** - Contra Costa Centre
- CR** - Crockett
- DI** - Diablo
- DB** - Discovery Bay
- ERH** - East Richmond Heights
- ES** - El Sobrante
- KNS** - Kensington
- KNT** - Knightsen
- MM** - Montalvin Manor
- MV** - Mountain View
- NC** - Norris Canyon
- NG** - North Gate
- NR** - North Richmond
- PA** - Pacheco
- PM** - Parkmead
- PC** - Port Costa
- RV** - Reliez Valley
- RO** - Rodeo
- RW** - Rollingwood
- SM** - San Miguel
- SS** - Sandmound Slough
- SP** - Saranap
- SR** - Shell Ridge
- TH** - Tara Hills
- VH** - Vine Hill



on existing legal lots where no other feasible building sites exist, and for infrastructure that requires high-elevation siting, such as wind turbines, communications towers, and water tanks. When siting buildings or infrastructure on or near ridges is unavoidable, require appropriate measures, such as screening, undergrounding, or camouflaging to mitigate visual impacts.*

COS-P12.4

Preserve the scenic qualities of hillsides by encouraging designs that are sensitive to a site's topography and prohibiting unnecessary grading and vegetation removal.

COS-P12.5

Require restoration of natural contours and vegetation after grading and other land disturbances.*

COS-P12.6

Prohibit extreme topographic modification, such as filling canyons or removing prominent hilltops. Exemptions may be considered for landfills, mining operations, and public or semi-public projects that necessitate such modifications.*

COS-P12.7

Support preservation and enhancement of natural and human-made features that contribute to the scenic quality of the landscape and watershed along designated scenic routes, and discourage projects that interfere with public views of those features.

COS-P12.8

Require a visual impact analysis for projects with potential to significantly impact public views along designated scenic routes.*

COS-P12.9

Enable flexibility in the design of projects in scenic corridors and support innovative solutions to protect views and visual quality.

Actions

COS-A12.1

Amend County Ordinance Code Division 814 – Slope and Hillside Development to convert the requirements from being a combining district to design and development standards related to building envelopes, building massing, colors, materials, grading, draining, and erosion control.

COS-A12.2

Adopt design guidelines to preserve views, vistas, and defining natural features along designated scenic routes.

MINERAL RESOURCES

Mining in Contra Costa County dates to the 1850s, when coal fields were discovered north of Mount Diablo. Today, mining activities focus on construction aggregate (crushed rock, sand, and sandstone). Two rock quarries near Clayton and a sand quarry near Byron annually produce

hundreds of thousands of tons of construction aggregate that is used for public infrastructure and private construction projects throughout Northern California. High-quality sand from Byron is also used in glass manufacturing, including bottles for California wineries. Mineral extraction in Contra Costa County therefore is an important component of the regional economy.

Conflicts between mining and urban uses throughout California led to passage of the Surface Mining and Reclamation Act of 1975 (SMARA). SMARA established policies for conservation and development of mineral lands and contains specific provisions for the classification of mineral lands by the State Geologist. SMARA requires all cities and counties to incorporate mapped designations approved by the State Mining and Geology Board (SMGB) in their general plans. These designations include lands categorized as Mineral Resource Areas (MRAs), the most significant of which contain mineral resources of regional or statewide significance. The county contains regionally significant MRAs, which are shown in Figure COS-11.

Goal COS-13

Continued economic viability of mineral extraction operations while minimizing land use conflicts and environmental impacts.


Policies

COS-P13.1  Protect valuable mineral resources by prohibiting incompatible projects and land uses (i.e., those that would directly or indirectly interfere with extraction, processing, or

transportation of mineral resources) within the MRAs identified in Figure COS-11.

COS-P13.2

Encourage compact design and layout for mineral resource processing areas, preserving as much land as possible for buffering between these areas and adjacent land uses.

COS-P13.3  For residential subdivisions within one mile of the MRAs depicted in Figure COS-11, require deed disclosures indicating the presence of the mineral resource and explaining potential disturbances (e.g., noise, dust, heavy truck traffic) associated with mineral extraction activities.*

COS-P13.4

Require applications for new or expanded quarrying operations adjacent to Mount Diablo State Park to include an analysis of potential impacts to the park's natural features, including viewsheds, and operations.*

COS-P13.5

Ensure that quarry reclamation plans, including bonding requirements, are maintained in compliance with SMARA.

Actions

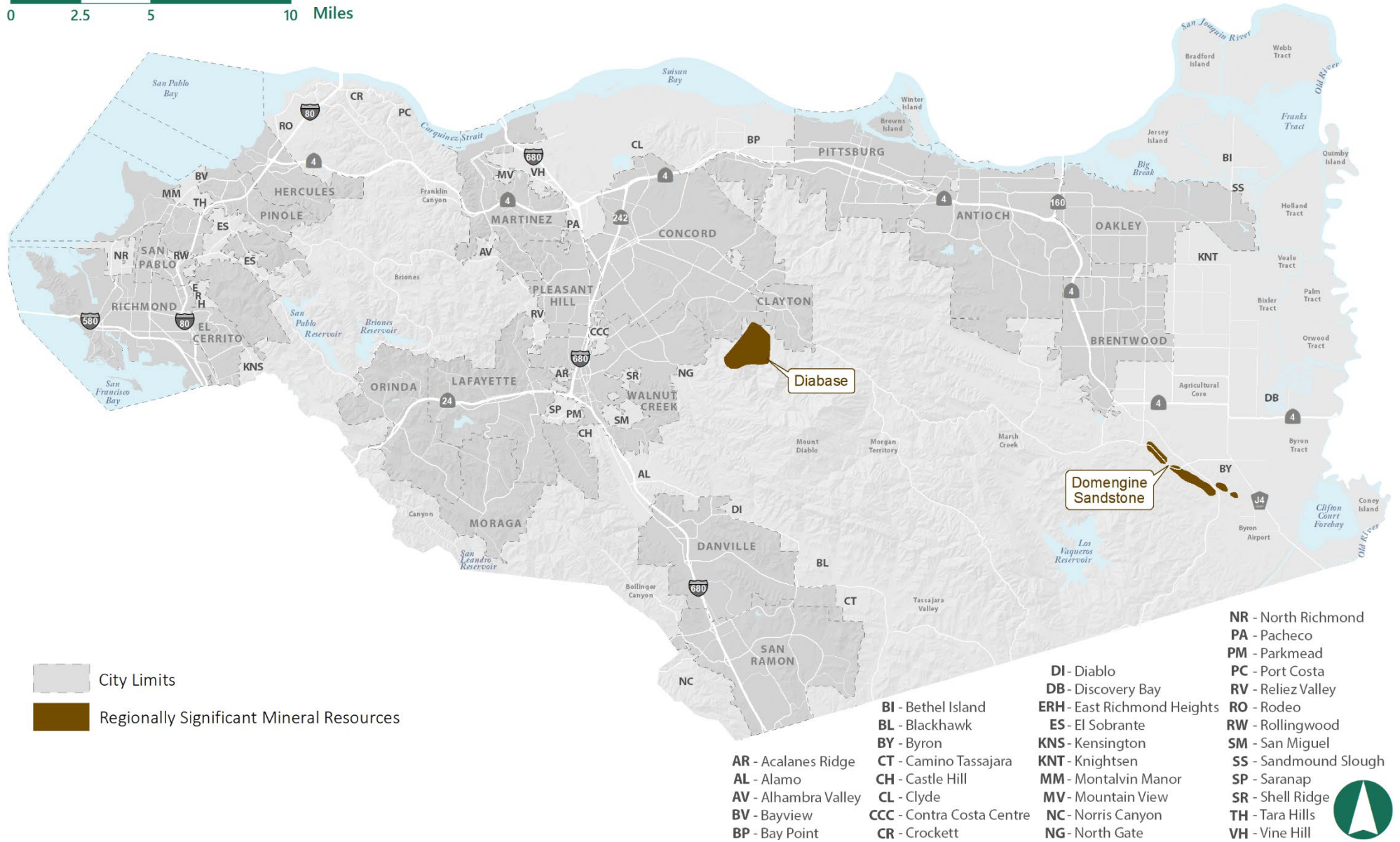
COS-A13.1

Update County Ordinance Code Chapter 88-11 – Surface Mining and Reclamation, as necessary to maintain consistency with SMARA.



FIGURE COS-11 MINERAL RESOURCE AREAS

0 2.5 5 10 Miles



ENERGY RESOURCES

Contra Costa County has long been an energy producer. Coal mining began in the 1850s, as indicated previously. The first petroleum refinery in the Bay Area opened in Rodeo in 1896 and the county has historically been home to a small oil and natural gas production industry. However, energy production in Contra Costa County is evolving as reliance on fossil fuels decreases and the State enacts more aggressive policies to combat climate change. In recent years, the State has increased support for transitioning to cleaner-burning biofuels through investments in technology, infrastructure, and production. Biofuels, including biomethane, biodiesel, and gasoline and diesel fuels derived from renewable sources instead of petroleum, can reduce reliance on traditional fuel sources, improve air quality, and reduce greenhouse gas (GHG) emissions. Two former petroleum refineries in the county have already begun converting their operations from refining crude oil to processing cleaner biofuels.

Today, most of the electricity generated in the county is from renewable sources, like wind and solar. The California Energy Commission designated the Altamont Pass area, including the Byron Hills portion of eastern Contra Costa County, as an area with high wind potential, as shown in Figure COS-12. In the early 1980s the private sector responded to that designation and federal and State tax incentives by moving rapidly into the wind energy business as a secondary use on agricultural land. Those first windfarms, which were inefficient and environmentally destructive, have since disappeared. Two modern windfarms with a generating capacity of 116.2 megawatts (MW) now operate in the county.

In 2017, the County received a grant from the California Strategic Growth Council to study the potential for renewable energy generation within its jurisdiction. The study estimated that 2,600 to 4,600 MW could be generated, with solar accounting for the vast majority (up to 4,410 MW, more

than 75 percent of which is in existing urban areas). In 2020 the County adopted its Solar Energy Facilities Ordinance and designated rural areas in East County as potentially suitable for large-scale commercial solar energy development, as shown on Figure COS-12. The Solar Energy Facilities Ordinance regulates commercial solar energy facilities (i.e., facilities generating electricity for off-site use, usually for sale on the wholesale energy market) and provides a simplified permitting process for facilities on rooftops and parking canopies in commercial and industrial areas. The County also supports installation of solar energy systems generating electricity for on-site use through a low-cost, expedited permit process.

Pacific Gas and Electric Company (PG&E) and MCE are the primary electricity providers for Contra Costa County. Most of the electricity consumed in the county is generated from large hydroelectric, solar, and wind sources, as indicated in the following graph.

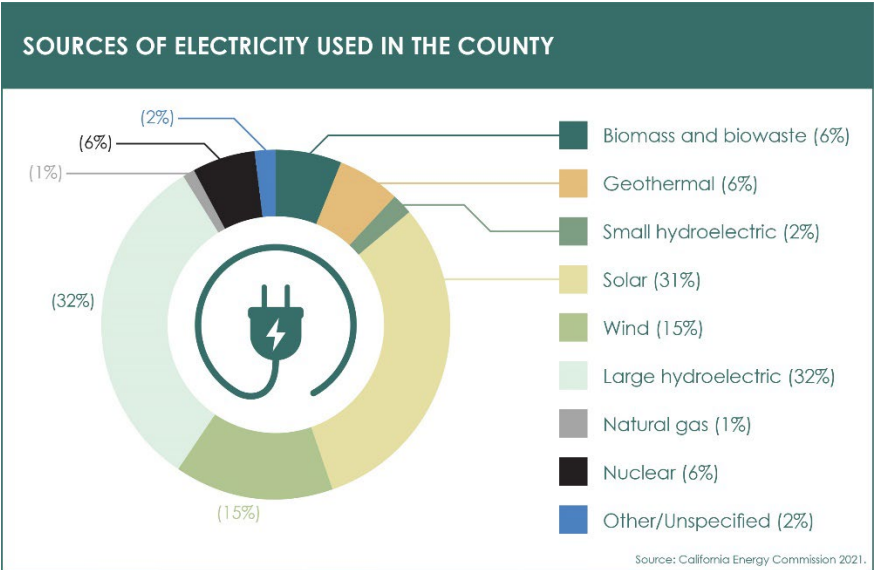
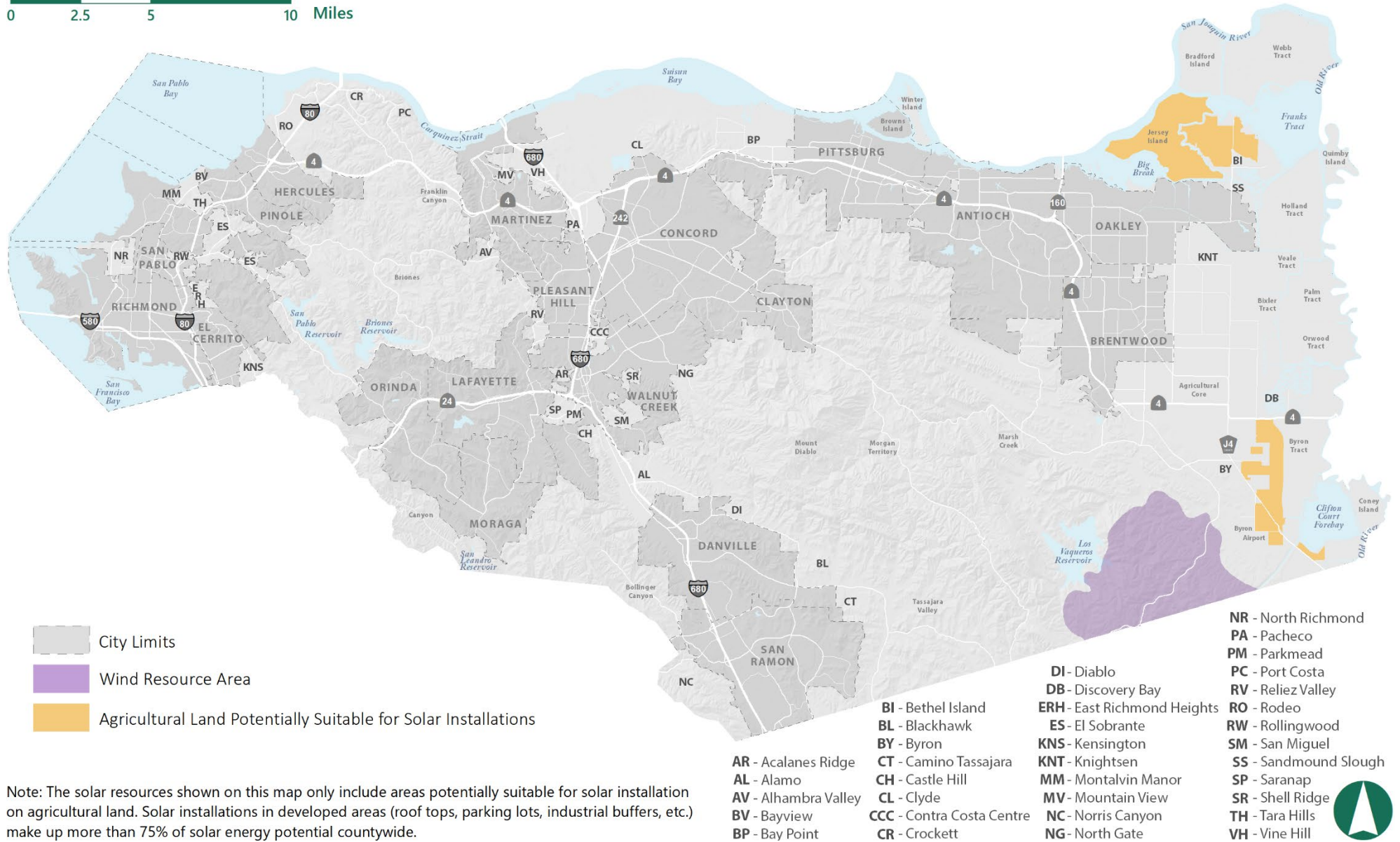




FIGURE COS-12 WIND AND SOLAR ENERGY RESOURCE AREAS IN RURAL AREAS

0 2.5 5 10 Miles



Note: The solar resources shown on this map only include areas potentially suitable for solar installation on agricultural land. Solar installations in developed areas (roof tops, parking lots, industrial buffers, etc.) make up more than 75% of solar energy potential countywide.



Wind turbines generate power in East Contra Costa County near Byron.

The State and Contra Costa County are moving towards reducing or eliminating natural gas use in existing and new buildings and transitioning to a clean energy economy. The County adopted an all-electric ordinance in 2022 requiring that all new residential, retail, office, and hotel buildings use electricity as the sole source of energy for space heating, water heating, cooking appliances, and clothes-drying appliances; natural gas and propane plumbing is prohibited. The County and regional utilities also provide rebates and programs to help make homes and businesses more resource efficient through energy audits, building retrofits, and opportunities to transition to a renewable electricity provider. The County continues to pursue opportunities for reducing overall energy use and increasing reliance on renewable sources, such as converting municipal and other wastes to energy resources (e.g., methane).

In December 2015 the County adopted a Climate Action Plan, which is the County's strategic approach to reducing GHG emissions from sources throughout the unincorporated area. The CAP identifies County programs and actions to decrease energy use, improve energy efficiency, develop renewable energy, reduce vehicle miles traveled, increase multi-modal travel options, expand green infrastructure, reduce waste, and improve the efficiency of government operations. The CAP also forecasts the County's GHG emissions and sets reduction targets and strategies. As a document that is integral to implementation of the General Plan, the CAP was updated in parallel with this General Plan.

Goal COS-14

Increased generation of and reliance on renewable, sustainable, and zero-carbon energy and reduced energy use.

Policies

COS-P14.1



Implement Climate Action Plan strategies to improve energy efficiency and conservation, promote carbon-free energy sources, and reduce energy-related GHG emissions.*

COS-P14.2



Partner with regional and State agencies (e.g., California Public Utilities Commission, California Energy Commission, and ABAG/MTC) to support energy efficiency and renewable energy planning efforts.



COS-P14.3

Support distributed electricity generation, including development of microgrids, renewable energy sources, storage capacity, and associated technologies. Encourage these throughout urban areas, and in nonurban areas when significant environmental impacts can be avoided or successfully mitigated.

COS-P14.4

For residential subdivisions within two miles of the wind resource area depicted in Figure COS-12, require deed disclosures indicating the presence of the wind resource area and explaining potential disturbances (e.g., noise, shadow/flicker) associated with wind turbines.

COS-P14.5

Support development of energy recovery projects (e.g., methane recovery from landfills and wastewater treatment plants).

COS-P14.6

Support efforts to convert existing buildings to be low-carbon or carbon neutral.

COS-P14.7

Encourage installation of battery storage systems in new and existing buildings, especially buildings with solar energy systems and buildings that provide essential community services.

COS-P14.8

Design and construct new County facilities to be zero net energy to the extent feasible.*

COS-P14.9

Work with energy service providers and the Bay Area Regional Energy Network to encourage property owners to participate in weatherization, education, rate incentive, and other programs and measures to improve energy efficiency in existing buildings.

COS-P14.10

Require replacement and new water heaters and space heating and cooling systems to be electric if the building electric panel has sufficient capacity in accordance with Bay Area Air Quality Management District Regulation 9, Rule 4, and Regulation 9, Rule 6.

Actions

COS-A14.1

Amend County Ordinance Code Chapter 88-14 – Oil and Gas Drilling and Production to:

- (a) Prohibit new and expanded oil and gas production wells in the following:
 - i. Sensitive ecological areas, such as wetlands and habitat for rare, threatened, endangered, or special-status species.

- ii. Areas subject to 100-year flood hazards or sea-level rise, as shown in Figures HS-2 and HS-6 through HS-9.
 - iii. Areas within 3,200 feet of sensitive receptors or urban land use designations unless project-specific exceptions are granted by the California Department of Conservation, Geologic Energy Management Division.
- (b) Restrict oil and gas drilling operations to agricultural zoning districts only.
 - (c) Require a land use permit for all new and expanded oil and gas wells.
 - (d) Require a reclamation plan for oil and gas well sites that includes bonding for site clean-up.
 - (e) Include performance standards related to water quality, air quality, odors, noise, and aesthetics.

In parallel, study the feasibility of amending the County Ordinance Code to prohibit development of new oil and gas wells and phase out existing oil and gas well operations.

COS-A14.2

Amend County Ordinance Code Division 88 – Special Land Uses to consolidate Chapters 88-3 and 88-30 governing wind energy conversion systems and solar energy facilities, respectively, into a new renewable energy chapter, with added provisions related to microgrids and battery energy storage systems.

COS-A14.3



Amend County Ordinance Code Chapter 88-3 – Wind Energy Conversion Systems to require that decommissioned

wind farms be returned to a condition consistent with the natural environment in the area at the time of decommissioning, rather than a return to pre-project condition. The following issues must be specifically addressed:

- (a) Unnecessary and poorly constructed roads that are sources of erosion.
- (b) Remaining turbine foundations/footings and underground conduit.
- (c) Abandoned equipment yards, turbine components, and other debris.

COS-A14.4



Consider adopting new or modified reach codes that exceed the California Building Standards Code to require the use of lower-carbon intensive energy sources, to achieve higher feasible levels of energy conservation and efficiency, and to achieve lower feasible levels of GHG emissions.

COS-A14.5



Maintain, update, publicize, and enforce the County Ordinance Code Title 7 – Building Regulations amendment requiring new residential buildings, hotels, offices, and retail to be all-electric. Evaluate the feasibility of including other building types as appropriate.

COS-A14.6



Create a County policy or program to facilitate making existing residential and nonresidential buildings more energy-efficient and powered by carbon-free energy.



COS-A14.7

Create a detailed roadmap to convert existing homes and businesses to use low- or zero-carbon appliances. The roadmap should include steps to support converting buildings to rely on low- or zero-carbon energy using an equitable framework that minimizes the risk of displacement or significant disruptions to existing tenants.

COS-A14.8

Evaluate options for incentivizing and requiring additions and alterations to be energy efficient and to achieve the lowest feasible levels of GHG emissions, including upgrades to the building electric panel as needed.

COS-A14.9

Ensure County-led and supported retrofit programs incentivize and prioritize conversion of buildings built before 1980 and emphasize assistance to owners of properties that are home to very low-, low-, and moderate- income residents or located in Impacted Communities, as permitted by available funding.

COS-A14.10

Support legislative efforts to establish a green bank able to equitably finance sustainability projects, including renewable energy, energy efficiency, and green infrastructure, for residential and commercial customers.

See the Transportation Element for policies and actions to reduce energy consumption in the transportation sector and the Health and Safety Element for policies and actions related to climate change and power line infrastructure and planned power shutoffs in relation to wildfire hazards.

CONSERVATION, OPEN SPACE, AND WORKING LANDS ELEMENT PERFORMANCE MEASURES

To track progress in achieving the major goals of this Element, every five years, the County will collect data to assess its performance against the following measures. Progress will be tracked relative to the prior performance review and the baseline year of 2024. Based on the findings from the five-year review, the County may adjust policies, actions, or the approach to implementing them to improve performance, as needed.

- Increased acreage of land designated Resource Conservation or Parks and Recreation.
- Increased gross value of agricultural production.
- Increased acreage of land acquired for conservation of ecological resources.
- Reduced per-capita water consumption.
- Reduced per-capita electricity and natural gas consumption.

8

PUBLIC FACILITIES AND SERVICES ELEMENT

Contra Costa County is committed to providing a high quality of life for its residents. This commitment includes providing public services, infrastructure, and facilities that are accessible to and benefit all county residents, while also working with outside service providers to accomplish those same goals. Although the Public Facilities and Services Element is not explicitly required by State law, the topics addressed here are an integral part of the County's overall planning strategy and a basic consideration in setting growth and development policy.

The following nine sections are included in this Element:

- The **General Public Facilities and Services** section includes policy guidance to support coordination, financing, and equitable distribution of public facilities and services that promote the economic, social, physical, and environmental wellbeing of residents.
- The **Water and Wastewater** section includes policy guidance to provide safe, resilient, and environmentally responsible water and wastewater services to meet existing and future needs.
- The **Drainage and Flood Risk** section includes policy guidance to support effective and resilient natural drainage systems and flood-risk management infrastructure.
- The **Sheriff, Fire, and Emergency Medical Service** section includes policy guidance to provide efficient and effective public safety and emergency services, with emphasis on improvements to the physical environment that support a safe and accessible public realm.

- The **Solid Waste Management** section includes policy guidance aimed at reducing waste, providing equitable and sustainable waste management services, and reducing illegal dumping.
- The **Parks and Recreation** section includes policy guidance to develop an integrated and accessible park and trail system with a focus on improving access to parks for Impacted Communities.
- The **Schools** section includes policy guidance to support a strong and diverse education system from primary school through higher education facilities.
- The **Libraries** section includes policy guidance to expand library services to support access to information and educational opportunities for residents of all ages.
- The **Public Facilities and Services Element Performance Measures** describe how the County will track its progress in achieving some of the major objectives expressed in this Element.

This General Plan highlights policies and actions that address four major themes that serve as a framework for the Plan. For the reader's ease, policies and actions related to these themes are identified throughout the General Plan using the following icons. The policies and actions related to each theme are also compiled in Appendix A. See Chapter 1 for more information about each theme.



Community Health



Environmental Justice



Economic Development



Sustainability

GENERAL PUBLIC FACILITIES AND SERVICES

Coordinated Facilities and Services



The Crockett Community Services District provides bocce courts at Rithet Park.

A complex array of County departments and districts and outside agencies serve the diverse needs of Contra Costa residents and businesses. In addition to the County and incorporated cities and towns, this includes:

- Community services districts providing police, recreation, water, wastewater, and solid waste services.
- Fire protection districts.
- Healthcare districts.
- Park and recreation districts.
- School districts and a community college district.
- Water districts, irrigation districts, and sanitary sewer districts providing water and wastewater services.
- Reclamation districts and a municipal improvement district providing flood protection and levee and drainage maintenance services.

The Contra Costa Local Agency Formation Commission (LAFCO) regulates the jurisdictional boundaries of all cities and special districts, affecting which agencies provide services to a given area. Properties inside city limits receive certain services from the incorporated city, such as law enforcement. Fire protection, parks and recreation, and various other services may be provided by the city or a special district, or a combination of both. Other countywide services, like health and human services, hazardous materials response, and criminal justice, are provided by the County. As such, the County operates at many levels, simultaneously providing mandated countywide services and local services to unincorporated areas, and coordinating with the activities of State agencies, cities, and regional and local special districts.

The County adopts a new budget annually that sets priorities and addresses operating costs. In September 2022, the Board of Supervisors adopted the Capital Facilities Master Plan, outlining a 20-year vision for transforming County facilities to improve customer service delivery and support County

employees providing those services, and guiding future capital facilities budgeting and planning decisions.

Through Senate Bill (SB) 244, State law requires that general plans identify Disadvantaged Unincorporated Communities (DUCs) and evaluate and address any infrastructure or fire service deficiencies in those communities to support public health and safety. For counties, DUCs are defined as an inhabited community with 10 or more dwelling units in close proximity, or where 12 or more registered voters reside, that is located outside of a city sphere of influence and has an annual median household income that is 80 percent or less of the statewide median. The County conducted a DUC analysis in 2023 and found that parts of Rodeo, Crockett, and Bethel Island meet the DUC criteria. Policy guidance related to infrastructure and service needs in these communities is provided in the respective Community Profiles, located in the Stronger Communities Element.

Goal PFS-1
Coordinated public facilities and services that support the economic, social, health, and environmental well-being of the county and its residents.

Policies

PFS-P1.1  Consider potential effects on the physical, social, cultural, and recreational needs of the surrounding community when developing new County facilities.

PFS-P1.2   Locate new County facilities that involve regular community access in places that are easily accessible by public transit, walking, and micromobility, to the greatest extent possible.

PFS-P1.3
Encourage, and whenever possible require, public agencies to locate, design, construct, and operate their facilities in a manner that complements and avoids conflict with adjacent land uses.

PFS-P1.4
Encourage, and whenever possible require, co-location and undergrounding of new utility infrastructure, such as transmission and distribution lines, fiber-optic cables, and pipelines, in existing rights-of-way to minimize visual, operational, and environmental impacts on the community.

Actions

PFS-A1.1
Streamline processes for special districts to establish new facilities that support their core mission and are consistent with General Plan goals and policies.

PFS-A1.2  Update the Capital Facilities Master Plan, Capital Road Improvement and Preservation Program, Parks Capital Improvement Program, and similar plans and programs as needed to maintain consistency with this General Plan, particularly its provisions related to environmental justice.



PFS-A1.3

Notify and request comments from utility service providers on development applications.*

PFS-A1.4

Upon each update to the Housing Element, perform an analysis of infrastructure needs and deficiencies in DUCs and explore funding mechanisms that could make extension of needed services and facilities feasible.*

Just and Equitable Facilities and Services

An uneven distribution of amenities along race and class lines reflects long legacies of racism and discrimination in how public facilities and services are provided. Environmental justice efforts seek equitable access to community investments, and SB 1000 requires that local agencies prioritize public investments in Impacted Communities, as discussed further in the Stronger Communities Element.

Figure PFS-1 shows the locations of existing community facilities countywide in relation to Impacted Communities. The policy guidance in this section seeks to combat historic discrimination by promoting equitable distribution of and access to public facilities and services, and prioritizing improvements in Impacted Communities. This includes the types of facilities shown on Figure PFS-1, as well as technological resources like broadband internet to promote success in the Information Age and equitable code enforcement to promote healthy and safe neighborhoods.

Goal PFS-2

Public facilities, infrastructure, and services that meet the needs of, and are accessible to, residents of Impacted Communities.

Policies

PFS-P2.1



Ensure County facilities and services meet the needs of all users, regardless of age, ability, race, ethnicity, culture, language, gender identity, or economic status.

PFS-P2.2



Pursuant to SB 1000, as part of the County's annual budgeting process, prioritize investments in public facilities, infrastructure, and services that benefit Impacted Communities and respond to their needs, particularly those needs identified in their Community Profiles.

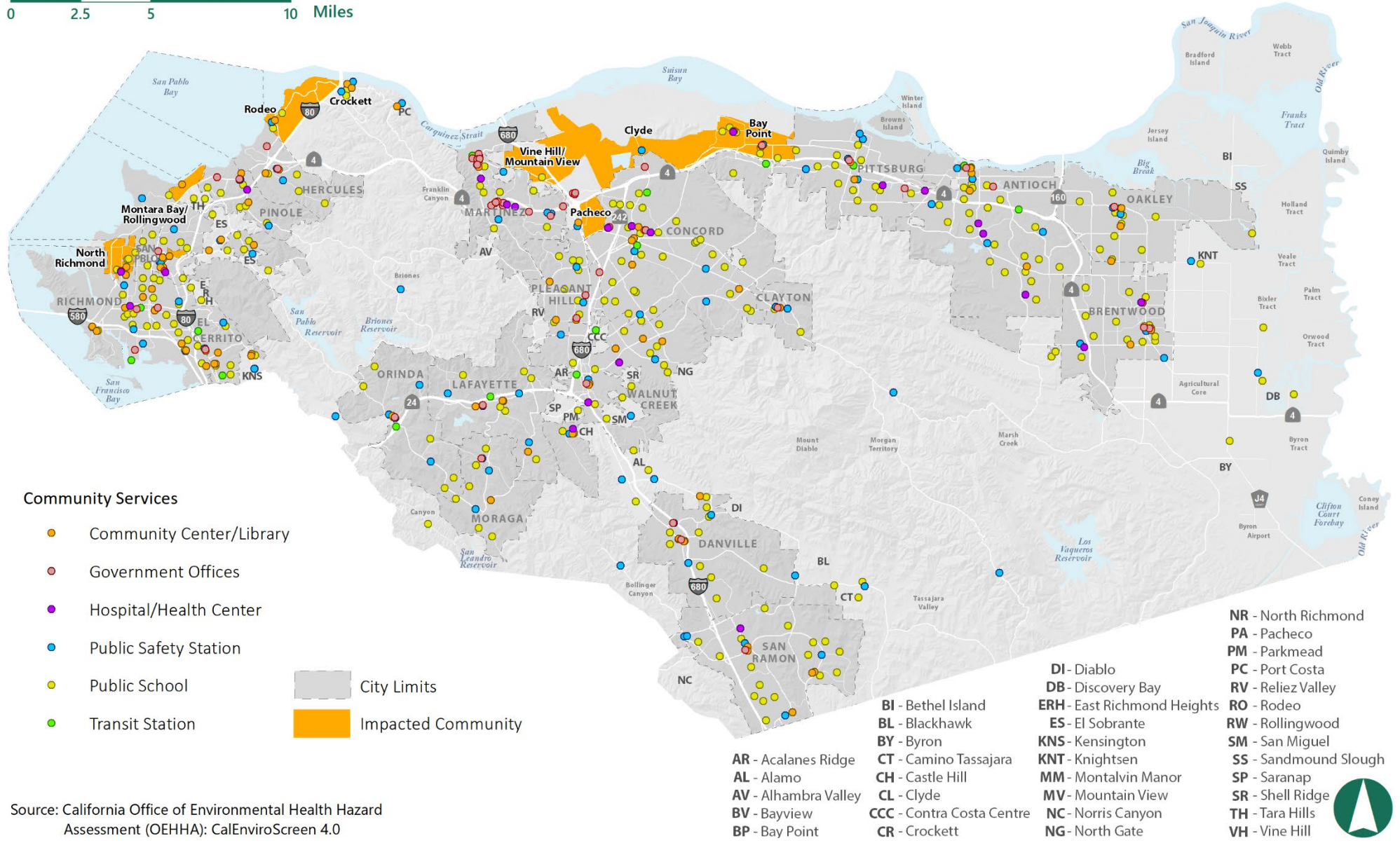
PFS-P2.3



Coordinate with service providers (e.g., water, wastewater, transit, and recreation districts) and advocate for proper planning, maintenance, and implementation of services and infrastructure to ensure efficient service delivery in Impacted Communities.

FIGURE PFS-1 COMMUNITY SERVICES FOR IMPACTED COMMUNITIES

0 2.5 5 10 Miles



Community Services

- Community Center/Library
- Government Offices
- Hospital/Health Center
- Public Safety Station
- Public School
- Transit Station

City Limits
 Impacted Community

- AR - Acalanes Ridge
- AL - Alamo
- AV - Alhambra Valley
- BV - Bayview
- BP - Bay Point
- BI - Bethel Island
- BL - Blackhawk
- BY - Byron
- CT - Camino Tassajara
- CH - Castle Hill
- CL - Clyde
- CCC - Contra Costa Centre
- CR - Crockett
- DI - Diablo
- DB - Discovery Bay
- ERH - East Richmond Heights
- ES - El Sobrante
- KNS - Kensington
- KNT - Knightsen
- MM - Montalvin Manor
- MV - Mountain View
- NC - Norris Canyon
- NG - North Gate
- NR - North Richmond
- PA - Pacheco
- PM - Parkmead
- PC - Port Costa
- RV - Reliez Valley
- RO - Rodeo
- RW - Rollingwood
- SM - San Miguel
- SS - Sandmound Slough
- SP - Saranap
- SR - Shell Ridge
- TH - Tara Hills
- VH - Vine Hill

Source: California Office of Environmental Health Hazard Assessment (OEHHA); CalEnviroScreen 4.0



PFS-P2.4

Continue to provide contact information for the Code Enforcement Section of the Department of Conservation and Development (DCD) on the front page of the DCD website. Maintain clear, simple lines of communication for residents to reach the County regarding code enforcement and nuisance complaints, and ensure equitable, prompt responses.

PFS-P2.5



Continue to prioritize and adequately fund code enforcement and clean-up of illegal dumping on public and private property in Impacted Communities.

Actions

PFS-A2.1



Establish funding and financing mechanisms in Impacted Communities to provide and maintain community-desired public facilities and services. These could be County- or community-initiated, and include business improvement districts, green benefit districts, and similar mechanisms.

PFS-A2.2



Establish an entity within the County tasked with ensuring that County services and facilities in Impacted Communities are coordinated, prioritized, and delivered efficiently and effectively.

PFS-A2.3



Implement and maintain urban greening and green infrastructure, such as sustainable/green street projects, in Impacted Communities.

PFS-A2.4



Regularly assess Code Enforcement responses and Public Works maintenance practices to ensure equitable implementation. Prioritize resources to keep Impacted Communities safe and clean, emphasizing enforcement actions on issues identified in Community Profiles.

PFS-A2.5

Work with the Contra Costa Crisis Center to provide Code Enforcement contact information through the 211 Contra Costa information service.

PFS-A2.6



Pursue public-private partnerships that will improve access to reliable, fast internet and make digital resources available in Impacted Communities at affordable prices.

Funding Services and Infrastructure

Financing capital improvements and public services within Contra Costa County is complex, given the large number of agencies involved. As urban growth continues throughout the county, demands for public services and infrastructure will increase, which can place higher fiscal burdens on service providers. Meanwhile, many service providers lack adequate funding for ongoing maintenance and eventual replacement of existing infrastructure,

much of which was constructed in the decades immediately following World War II.

Special financing mechanisms may be required to support major new development. These could include County Service Areas, community facilities districts, or other benefit assessment districts that fund services through a special tax on properties within the service area. New development is also subject to the County's impact fee programs, which apply fees to development projects proportionate to the cost of providing public facilities and services to the development.



Streetscape improvements like this project along Fred Jackson Way in North Richmond are provided by the County's Public Works Department.

Goal PFS-3
Adequate, fair, and cost-effective funding for public facilities, infrastructure, and services.

Policies

PFS-P3.1

Coordinate with LAFCO, infrastructure and service providers, and cities to ensure infrastructure and services are reliable and provided in a cost-effective and equitable manner.*

PFS-P3.2

Require new development to pay its fair share of public improvement costs for infrastructure, facilities, maintenance, and services based on the proportionate cost of serving the project.*

PFS-P3.3

When new development cannot adequately be served by existing infrastructure and facilities or through the County's impact fee programs, require a public facilities financing plan that identifies the necessary public improvements and establishes an equitable plan to pay for and develop the required improvements.*

PFS-P3.4



When communities request levels of County services that exceed the countywide standard, require creation of (or annexation into) a County Service Area, community facilities district, or equivalent mechanism to fund the supplemental service costs. Allow exceptions for enhanced services in Impacted Communities if alternative funding sources can be identified.*



PFS-P3.5

When new development needs ongoing infrastructure maintenance that exceeds County standards or existing funding levels, require creation of or annexation to a County service area, community facilities district, benefit assessment district, or other special funding unit to pay for those maintenance activities.*

PFS-P3.6



When adopting, amending, and imposing impact fees, community benefits agreements, and developer exactions, consider the effects of such fees and exactions upon individual project economics, housing supply, economic development, and the County's broad goals and objectives related to overall community development. If gap funding can be identified, consider fee reductions or exemptions for projects in Impacted Communities that are consistent with the community objectives identified in their Community Profile.

Actions

PFS-A3.1

Implement an equitable and standardized approach to property tax sharing with cities during the annexation process.

PFS-A3.2

Regularly update development impact fees to ensure new development pays its fair share of infrastructure and service costs.*

WATER AND WASTEWATER

Water service consists of transmission of raw water from its source to a treatment facility, treatment, and then distribution through a network of pressurized pipes. Water service in unincorporated urban parts of Contra Costa County is provided by special districts and some cities, as shown in Figure PFS-2. The major water service providers in the unincorporated county are East Bay Municipal Utility District (EBMUD) and Contra Costa Water District (CCWD).

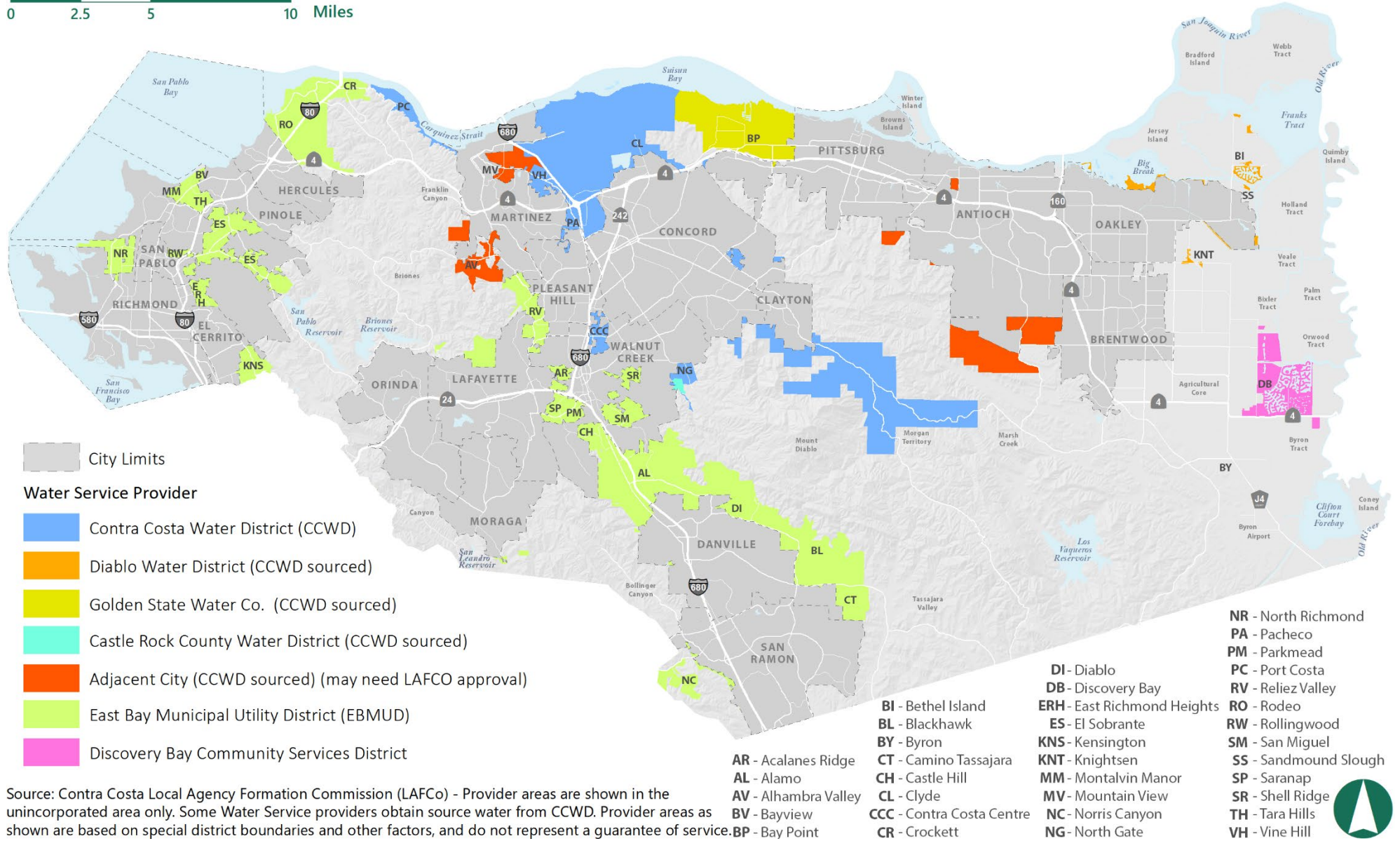
- **EBMUD** provides treated water to approximately 1.4 million customers in western Contra Costa County and portions of Central County. EBMUD brings water from the Mokelumne River watershed in the Sierra Nevada through three 81-mile aqueducts to the East Bay. Water is stored in a network of reservoirs, including Briones, Lafayette, San Pablo, and San Leandro in Contra Costa and Alameda Counties prior to treatment.
- **CCWD** provides treated water to approximately 500,000 customers in the urbanized parts of central Contra Costa County that are not serviced by EBMUD, as well as some eastern parts of the county. CCWD's water is sourced from the Sacramento-San Joaquin Delta via the 48-mile Contra Costa Canal. CCWD also stores water at Los Vaqueros Reservoir in East County, southwest of Byron.

Properties outside of a water service district rely on individual groundwater wells or private water systems.

Wastewater service consists of transmission of wastewater to a treatment facility, treatment, and then disposal of the wastewater and residual waste solids. As shown in Figure PFS-3, many special districts are responsible for wastewater service in unincorporated Contra Costa County. The largest wastewater service providers include Central Contra Costa Sanitary District

FIGURE PFS-2 WATER SERVICE DISTRICTS

0 2.5 5 10 Miles

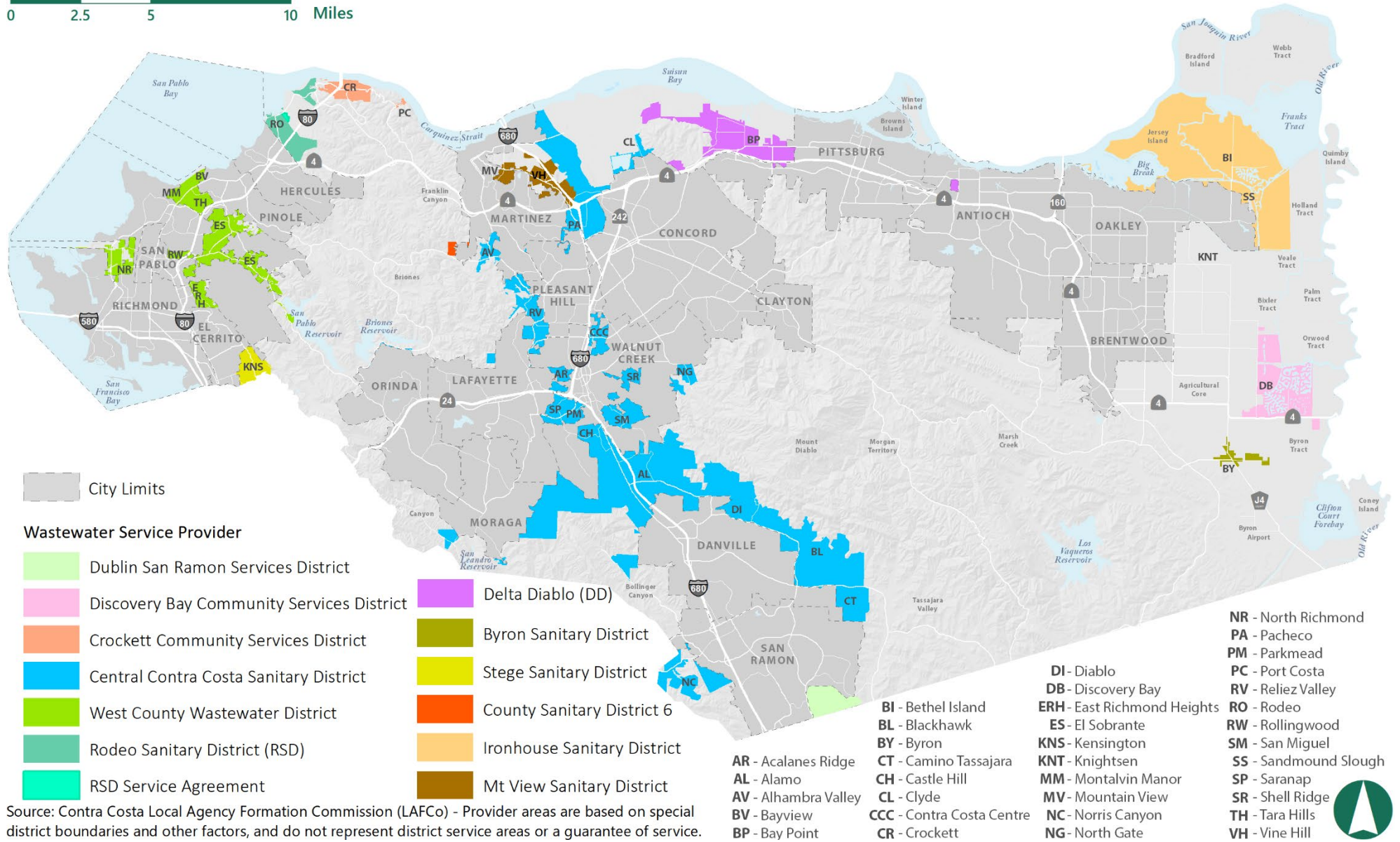


Source: Contra Costa Local Agency Formation Commission (LAFCo) - Provider areas are shown in the unincorporated area only. Some Water Service providers obtain source water from CCWD. Provider areas as shown are based on special district boundaries and other factors, and do not represent a guarantee of service.



FIGURE PFS-3 WASTEWATER SERVICE DISTRICTS

0 2.5 5 10 Miles



Source: Contra Costa Local Agency Formation Commission (LAFCo) - Provider areas are based on special district boundaries and other factors, and do not represent district service areas or a guarantee of service.

(CCCSD), which serves most of Central County, and the West Contra Costa Sanitary District (WCCSD), which serves much of West County. Rural areas outside district boundaries rely on on-site wastewater treatment systems to treat sewage.

Goal PFS-4
Water and wastewater services that meet current and future needs in a safe, resilient, and environmentally responsible manner.

Policies

PFS-P4.1



Support the goal of regional self-sufficiency as part of new water system planning efforts, where all regions in the state are required to implement a variety of local water supply options and institute conservation and reuse programs to reduce reliance on exports from the Delta.

PFS-P4.2



Encourage water service providers to require separate service connections and meters for recycled water use or where large quantities of water are used for special purposes, such as landscape irrigation.

PFS-P4.3

Support the State Water Resources Control Board's efforts to eliminate small public water systems in new development.

Allow such systems only for projects that cannot feasibly be connected to a public water system.*

PFS-P4.4



Partner with water service providers to ensure continuity of service and provide financial relief to Impacted Communities if prices rise during drought conditions.

PFS-P4.5



Require new development to demonstrate the availability of a safe, sanitary, and environmentally sound water delivery system with adequate capacity.*

PFS-P4.6



Require new development to demonstrate the availability of a safe, sanitary, and environmentally sound wastewater treatment system with adequate capacity.*

PFS-P4.7

Support CCWD's planned Phase 2 Expansion of Los Vaqueros Reservoir.

See the Conservation, Open Space, and Working Lands Element for policies and actions related to water quality, conservation, and management.

DRAINAGE AND FLOOD RISK

Unlike engineered domestic water and sanitary sewer systems, the pattern of stormwater drainage is determined by water's natural tendency to flow downhill. Consequently, much of the drainage system serving the county consists of natural drainage swales, ditches, and watercourses. Water ultimately drains into San Francisco and San Pablo Bays, or the Delta.



Flood control infrastructure includes levees, drainage channels, and other structures designed to prevent creeks, the Delta, and other water bodies throughout Contra Costa County from overflowing their banks and causing floods. Conventional flood control infrastructure often incorporates concrete and riprap lined channels, detention basins, and other highly engineered solutions. Increasingly, communities and agencies are transitioning to “green infrastructure,” which focuses on using natural drainage swales, permeable pavement, and rain gardens to filter and absorb stormwater.

The Contra Costa County Flood Control and Water Conservation District (CCCFCWCD), which is a dependent special district governed by the County Board of Supervisors, is responsible for regional flood control projects. Incorporated cities and the CCCFCWCD have developed regional drainage plans in many areas to guide developers in implementing new drainage systems as part of development projects, and to provide the basis for local and federal flood control projects. On-site drainage infrastructure is provided and/or improved by developers as part of the land development process.

Levees are especially important components of the county’s flood control infrastructure. Figure PFS-4 depicts Contra Costa’s levee system, most of which is owned and operated by public agencies such as reclamation districts. Similar to dams, levees hold back water and protect lower-lying areas from inundation. In Contra Costa County, many of these areas are at or below sea level. Levees protect critical infrastructure, including EBMUD’s water aqueducts, highways, railroads, natural gas pipelines and storage facilities, electrical transmission lines, and more. Many levees in the Delta region are unstable; they were constructed over 100 years ago on land that is settling due to subsidence and were not built to provide long-term protection. Since 1980, 27 Delta islands have been partially or completely flooded due to levee failure. Sea level rise, increased storm frequency and intensity, and higher flows from greater rainfall and less snowfall as a result of climate change will continue threaten levee stability and effectiveness.

The California Department of Water Resources (DWR) implements the Central Valley Flood Protection Plan (CVFPP) to improve flood risk management in the Central Valley and the Delta. The CVFPP seeks to integrate and improve ecosystem functions concurrently with flood management investments and projects. It also calls for local agencies to protect urban communities (defined as communities with at least 10,000 residents) in the Central Valley from a 200-year flood, which is a flood that has a 0.5-percent probability (1 in 200) of occurring in any year. In unincorporated Contra Costa County, only Discovery Bay meets the criteria for 200-year flood protection.



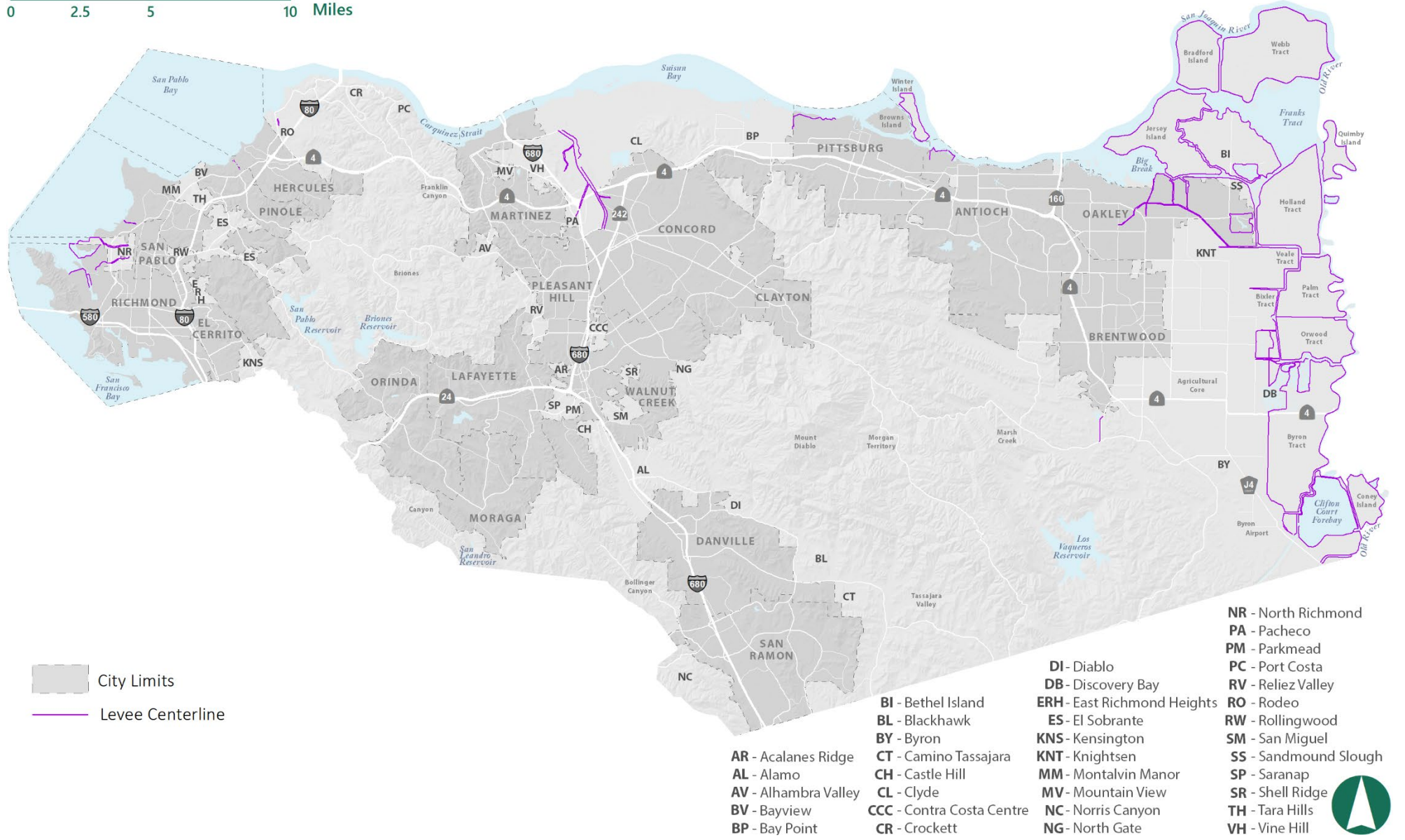
The capacity of Grayson Creek in Pacheco has been increased to protect against flooding

Goal PFS-5

Natural systems and flood-risk management infrastructure that can handle stormwater year-round and adapt to new and changing conditions.

FIGURE PFS-4 LEVEE CENTERLINES

0 2.5 5 10 Miles





Policies

PFS-P5.1

Support public and private efforts to improve protection against flooding, subsidence, and inundation, especially projects that achieve 200-year flood protection or better, factoring in anticipated sea-level rise, in areas of the county covered by the CVFPP.

PFS-P5.2

Partner with responsible parties, public and private, to ensure ongoing funding exists for maintenance and rehabilitation of flood management facilities and structures (e.g., levees, pump stations, canals, channels, and dams), particularly those that do not meet adopted State or federal flood-protection standards.*

PFS-P5.3

Allow for future height increases to private levees protecting inland areas from tidal flooding and sea-level rise by requiring rights-of-way and setbacks to be sufficiently wide on the levee's upland side and prohibiting new structures from being constructed on top of or immediately adjacent to the levee.

PFS-P5.4

Support material stockpiling and equipment staging for emergency levee repair, especially in the western Delta.

PFS-P5.5

Encourage new development to participate in programs that ensure ongoing maintenance of natural watercourses to maintain their flood carrying capacity and habitat values.

PFS-P5.6



When developing new or revised regional drainage and flood management plans, including plans to protect against sea-level rise, incorporate adequate setbacks and alternative drainage system improvements that provide aesthetic, recreational, and environmental benefits. Improvements should avoid structural modifications to watercourses and preserve riparian habitat and floodplains, and convert engineered drainage systems to more natural systems, when and where possible. In areas at risk of temporary or permanent inundation from sea-level rise, ensure that improvements can continue to provide adequate protection for the projected level of inundation by 2100 or the expected operational life of the project, whichever is later.*

PFS-P5.7



Incorporate green infrastructure into new and retrofitted flood-control and streetscaping projects, including replacing existing asphalt and other hardscapes with green infrastructure, as feasible.*

PFS-P5.8



Encourage developers of properties along transit corridors and in commercial areas to combine their private stormwater treatment facilities with green infrastructure on the adjoining street frontage.

PFS-P5.9

Encourage public participation in design processes for major flood control and sea-level-rise resiliency projects to ensure that these facilities are context-sensitive and provide multiple public benefits whenever possible.

Actions

PFS-A5.1

Identify existing developed areas where drainage maintenance issues exist and coordinate with each affected community to consider creating a benefit assessment district or similar local funding mechanism to pay for improvement and maintenance needs.*

PFS-A5.2



Coordinate with responsible parties, public and private, to develop a flood risk management plan for the levee systems protecting the unincorporated county that:

- (a) Identifies the entities responsible for operation and maintenance of the levees.
- (b) Determines the anticipated flood levels in the adjacent waterways and the level of protection offered by the existing levees along the waterways.
- (c) Establishes a long-term plan to upgrade the system as necessary to provide at least a 100-year level of flood protection, and 200-year level of flood protection where required.
- (d) Considers the worst-case situations of high tides coupled with sea-level rise and storm-driven waves.

- (e) Protects beneficial uses of San Francisco Bay and the Delta and their water.
- (f) Prioritizes designs that foster riparian habitat while containing floodwaters, such as by using more natural materials, landforms, and vegetation, rather than concrete channels and other conventional flood-control infrastructure.
- (g) Encourages multipurpose flood-management projects that, where feasible, incorporate recreation, resource conservation, preservation of natural riparian habitat, and scenic values of waterways.
- (h) Takes a holistic approach to flood-risk management so that new infrastructure does not simply transfer flooding impacts from one property or location to another.
- (i) Considers flood and tidal impacts to existing brownfields, especially adjacent to shorelines.
- (j) Includes provisions for updates to reflect future State- or federally mandated levels of flood protection.

PFS-A5.3



Develop watershed management plans incorporating best management practices that slow, spread, and sink water runoff to flatten the hydrograph (i.e., water flow over time) where erosion is a concern, while also enhancing wildlife habitat and recreation opportunities where feasible.*

PFS-A5.4



Establish programs for development projects alongside natural watercourses that ensure regular maintenance of the waterway, including debris removal, erosion control, and conservation and restoration of native species.*



PFS-A5.5



Coordinate with the Contra Costa County Mosquito and Vector Control District to identify and remedy areas with ongoing drainage problems to reduce disease risk from stagnant water.

See the Health and Safety Element for policies and actions related to flood hazards and sea-level rise and the Parks and Recreation section later in this Element for policies and actions related to secondary recreational uses of flood-control infrastructure.

SHERIFF, FIRE, AND EMERGENCY MEDICAL SERVICE

Law enforcement services in Contra Costa County are provided by several agencies at various levels of government. In the unincorporated county, community policing is provided primarily by the Contra Costa County Sheriff's Office, with special districts like the Kensington Police Protection and Community Services District providing service in certain areas.

Beyond police services, careful design of the built environment can also help prevent crime and increase the sense of safety. Research has shown that the *certainty* of being caught is a highly effective deterrent to criminal activity. Design elements that enhance visibility of public spaces, such as adequate lighting and windows and porches that encourage residents to have “eyes on the street,” can create safer environments. The policy guidance in this section emphasizes improvements to the physical environment that support an accessible and visible public realm. Additional policy guidance in the Stronger Communities Element addresses engagement with Impacted

Communities to ensure the designs for public realm improvements allow residents and visitors to feel safe and welcomed.

Fire protection services in unincorporated Contra Costa County are provided by six fire protection districts, as shown in Figure PFS-5. All fire protection agencies within the county have signed mutual-aid agreements to provide assistance to neighboring agencies. The firefighting capabilities of these agencies are further augmented by personnel and equipment from the California Department of Forestry and Fire Protection.



The Contra Costa Fire Protection District operates this station in rural Briones Valley.



Contra Costa County Health Services contracts with the Contra Costa Fire Protection District, Moraga-Orinda Fire Protection District, San Ramon Valley Fire Protection District, and American Medical Response to provide emergency ambulance service. Emergency response calls for the unincorporated county are fielded by the Office of the Sheriff's Communications Center.

Public safety response time standards provide a means to ensure that the community will remain safe as the county develops. The County strives to achieve the following public safety standards:

- **Sheriff Response Times:** Average law enforcement response time of five minutes or less for Priority 1 calls (where a threat to people may exist).
- **Fire Response Times:**
 - Four minutes or less response time for the arrival of the first engine company at a fire suppression incident, 90 percent of the time.
 - Six minutes or less response time for the arrival of the second engine company at a fire suppression incident, 90 percent of the time.
 - Eight minutes or less response time for an initial full alarm assignment at a fire suppression incident that does not involve a high-rise building, 90 percent of the time.
 - Ten minutes and 10 seconds or less response time for an initial full alarm assignment at a fire suppression incident that involves a high-rise building, 90 percent of the time.
- **Emergency Medical Services Response Times:**
 - Four minutes or less response time for the arrival of a unit with a first responder, 90 percent of the time.

- Eight minutes or less response time for the arrival of an advanced life support company, 90 percent of the time.

Goal PFS-6

Efficient and effective law enforcement, fire, and emergency medical services for all communities.

Policies

PFS-P6.1

Require new development to support effective law enforcement and fire protection by providing a safe and accessible public realm for all.

PFS-P6.2

Design, improve, and maintain public spaces to maximize visibility and safety through appropriate lighting and landscaping.

PFS-P6.3

During the discretionary review process for projects with potential to increase demand on fire protection services, consult with the applicable fire district to identify any upgrades to fire protection facilities, infrastructure, and equipment needed to reduce fire risk and improve emergency response.*



Actions

PFS-A6.1

Engage community members, law enforcement, and local leaders, and amend the County Ordinance Code to incorporate standards for new development that support a safe, accessible public realm for all through environmental design.*

See the Health and Safety Element for policies and actions related to wildfire hazards and emergency response and the Transportation Element for policies and actions related to safe streets.

SOLID WASTE MANAGEMENT

In Contra Costa County, the private sector is mainly responsible for solid waste collection and disposal, and the County is responsible for planning, administration, and facility approval. The County, Joint Powers Authorities (JPAs), and certain special districts enter into franchise agreements with private waste haulers to provide collection services. The County oversees solid waste management for about half of the unincorporated population, which is currently serviced by four different franchise agreements. Disposal facilities, which are shown in Figure PFS-6, are privately owned. Given the many entities involved, public and private, effective solid waste management requires significant coordination.

Reducing waste in the first place, along with repairing or reusing items and materials, are important strategies for overall sustainability. The California Integrated Waste Management Act (CIWMA) requires cities and counties to adopt and implement waste diversion programs for source reduction, recycling, and composting, and requires that each county adopt a Countywide Integrated Waste Management Plan (CoIWMP); the County's

CoIWMP was adopted in May 1993. In addition to the CIWMA, the State continues to enact laws addressing solid waste and recycling. The County reports to the State annually regarding compliance with existing laws, including diversion goals and waste reduction measures.

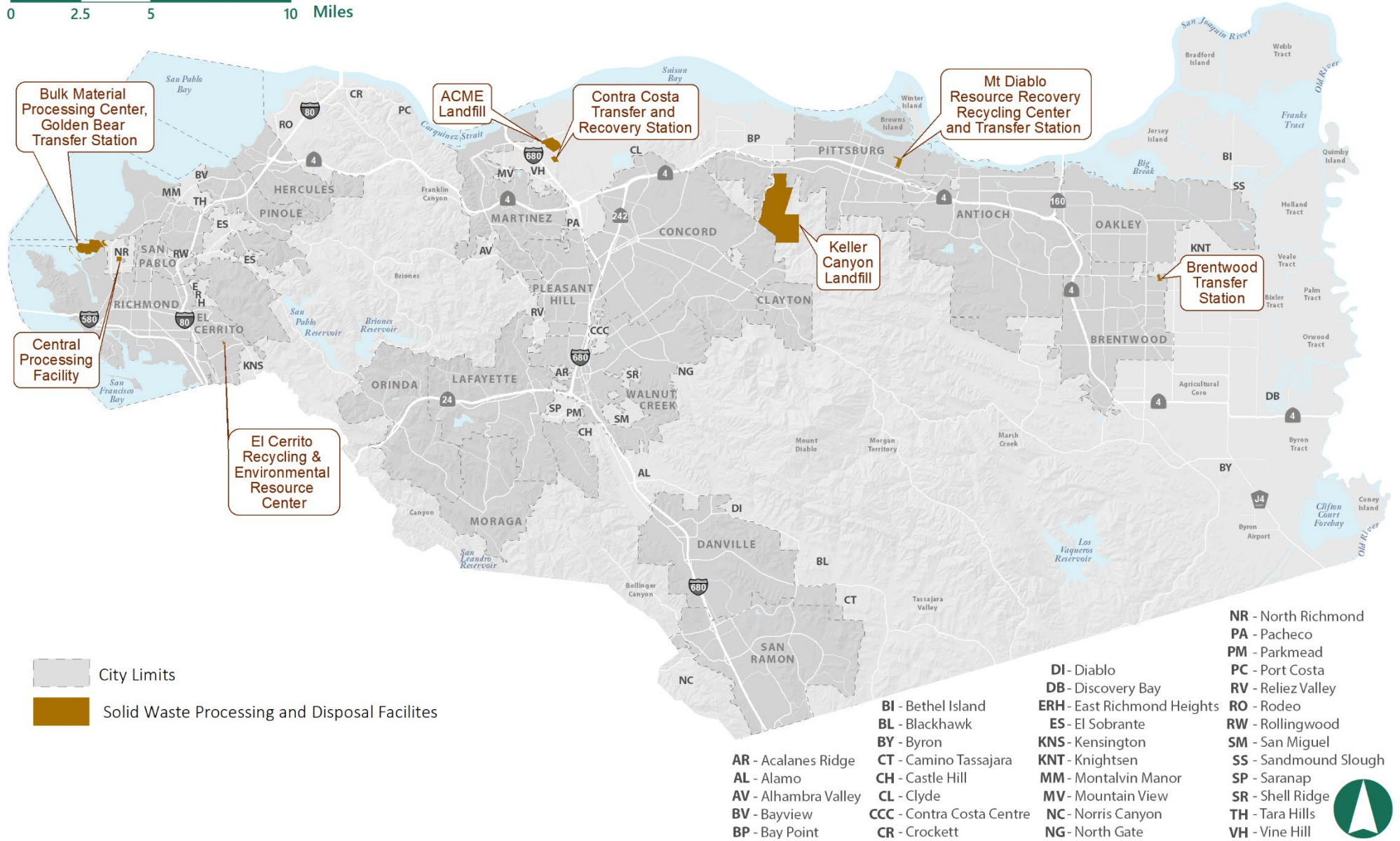
Waste that is not diverted is deposited into landfills, where it breaks down slowly and emits methane, a potent greenhouse gas (GHG), contributing to climate change. Methane emissions from landfills are a major source of the GHG emissions generated in the county. Landfill operators already capture a large proportion of this methane, which can be used to generate energy or converted to a liquid fuel that can be used to power vehicles and other equipment. There are opportunities for landfill operators to expand the methane collection infrastructure at the county's landfills, capturing more methane and reducing the county's GHG emissions.

Illegal dumping is a large-scale pervasive problem in Contra Costa County and a high-priority issue because of its immediate and long-term adverse effects on health and safety, community assets, community pride, economic development, and natural habitats. Illegal dumping hot spots are widespread throughout the county, occurring on rural roads and agricultural land, in suburban neighborhoods, and in urban environments affecting many communities regardless of socio-economic status. However, Impacted Communities are disproportionately affected by illegal dumping. In 2018, the County formed an interdepartmental team and began implementing strategies to combat illegal dumping as part of the Contra Costa County Illegal Dumping Initiative. Strategies are grouped into four categories: educate, prevent, clean up, and enforce; they include a public outreach campaign to educate residents about dumping, street signs placed near dumping zones with information on how to report dumping activity, removal of abandoned recreation vehicles, and dedicated law enforcement to investigate dumping crimes.



FIGURE PFS-6 SOLID WASTE PROCESSING AND DISPOSAL FACILITIES

0 2.5 5 10 Miles





Illegal dumping in Bay Point harms community character, health, economy, and natural resources.

Goal PFS-7

Safe, efficient, and environmentally responsible solid waste diversion and reduction practices and management.

Policies

PFS-P7.1

Coordinate with private solid waste collection and disposal companies, cities, and other appropriate agencies to plan solid waste management facilities that are safe, effective, and efficient.*

PFS-P7.2

Coordinate with other jurisdictions to ensure that solid waste management, including solid waste resource recovery (e.g., reduce, reuse, recycle, compost, and waste-to-energy), is carried out in accordance with the ColWMP and meets strict environmental standards.*

PFS-P7.3

Strive to provide equivalent solid waste collection services and rates across each unincorporated community under County franchise control.

PFS-P7.4

Ensure that new development complies with the requirements of the ColWMP.*

PFS-P7.5

Require new residential and commercial uses to provide adequate space for trash, recycling, and organics collection, as well as edible food recovery when applicable.*

PFS-P7.6



Encourage new technologies for organics processing consistent with SB 1383, the Short-Lived Climate Pollutants Reduction Strategy of 2016.

PFS-P7.7



Support expansion of recycling programs and efforts to locate convenient, accessible recycling centers in Impacted Communities.



PFS-P7.8 

Consistently use a multipronged approach (i.e., educate, prevent, clean up, enforce) to combat illegal dumping.

PFS-P7.9 

Prohibit new landfills in ecologically sensitive areas, and require that new landfills be located, designed, and operated to avoid adverse impacts to surrounding land uses, including by limiting the area of landfill activities; limiting hours of operation; providing safe and appropriate transportation routes; maintaining site security; identifying associated off-site feeder transfer stations; grading to blend the landfill disturbance area with surrounding topography; covering refuse daily; and mitigating noise, odor, litter, and visual impacts.*

PFS-P7.10 

Require that new landfills provide the following:

- (a) An appropriate leachate collection and recovery system.
- (b) An approved erosion-control and drainage plan.
- (c) Geotechnical studies, including stability analysis, to determine the most appropriate engineering design.
- (d) A habitat enhancement plan that provides for at least a 3:1 replacement for lost significant habitat.*

PFS-P7.11  

Require new landfills to be designed and operated so that upon decommissioning they can be repurposed for other uses, such as renewable energy facilities, recycling and

organics recovery operations, outdoor recreation facilities, and open space.

PFS-P7.12 

Require that new and expanded landfill operations significantly reduce GHG emissions to meet or exceed State targets to the extent feasible, and work toward carbon-neutral landfills.

PFS-P7.13 

Extend the life of landfills by continually striving to:

- (a) Reduce the amount of solid waste generated.
- (b) Reuse and recycle as much solid waste as possible.
- (c) Utilize the energy and nutrient value of solid waste (i.e., waste-to-energy and composting).
- (d) Properly dispose of remaining solid waste.*

PFS-P7.14

Discourage direct public access to landfills and instead direct the public to transfer stations. Base the need for new or expanded transfer stations on economics, the need to mitigate traffic impacts, and the need to inspect refuse for hazardous materials and recyclables.

PFS-P7.15 

Ensure transfer stations provide adequate capacity to accommodate recovery of recyclables and organic materials and encourage organics processing.*

PFS-P7.16

Include a condition of approval in land use permits for solid waste facilities requiring review for compliance with permit conditions every three to five years.*

Actions

PFS-A7.1

Study the potential benefits of combining the County's solid waste collection franchise agreements, or adjusting the boundaries of franchise service areas, to improve efficiency and consistency.

PFS-A7.2



Streamline the permitting process for composting, organics processing, and repair/reuse facilities.

PFS-A7.3



Partner with community organizations and solid waste franchise collection haulers to maximize participation in community clean-up days and residential on-call garbage pick-ups in Impacted Communities. Encourage community participation by holding these events in conjunction with other community events whenever possible.

PFS-A7.4



Work with other counties, cities, and community members to establish public/private partnerships to combat illegal dumping.

PFS-A7.5



Install signage and increase education, monitoring, enforcement, and rapid cleanup to discourage illegal dumping, especially in Impacted Communities and rural areas.

PFS-A7.6



Use the County's legislative platform process and partner with other public agencies throughout the state to propose and support legislation to combat illegal dumping.

PARKS AND RECREATION

Contra Costa County is an outdoor enthusiast's delight. Whether it is a peaceful nature walk through Carquinez Strait Regional Shoreline, an exciting hike around historic Black Diamond Mines Regional Preserve, fishing at a local reservoir, or a fun day out with family and friends at a neighborhood park, the county offers something for residents of all ages and abilities. In this region, one can explore the beautiful landscapes, appreciate breathtaking views, enjoy outdoor activities, and learn about the local flora and fauna. This wide variety of activities encourages physical activity, learning, and socialization, while also providing opportunities for people to connect with nature and enjoy the outdoors. Quality parks and recreational opportunities can also contribute to economic development by attracting visitors and promoting tourism. Overall, parks and recreation are essential to creating healthy, vibrant communities where individuals and families thrive.



The Carquinez Strait Regional Shoreline provides trail recreation opportunities for residents and visitors. (Community-submitted photo)

Most county residents are fortunate to have access to a variety of parks and trails in unincorporated areas, as shown on Figures PFS-7 and PFS-8:

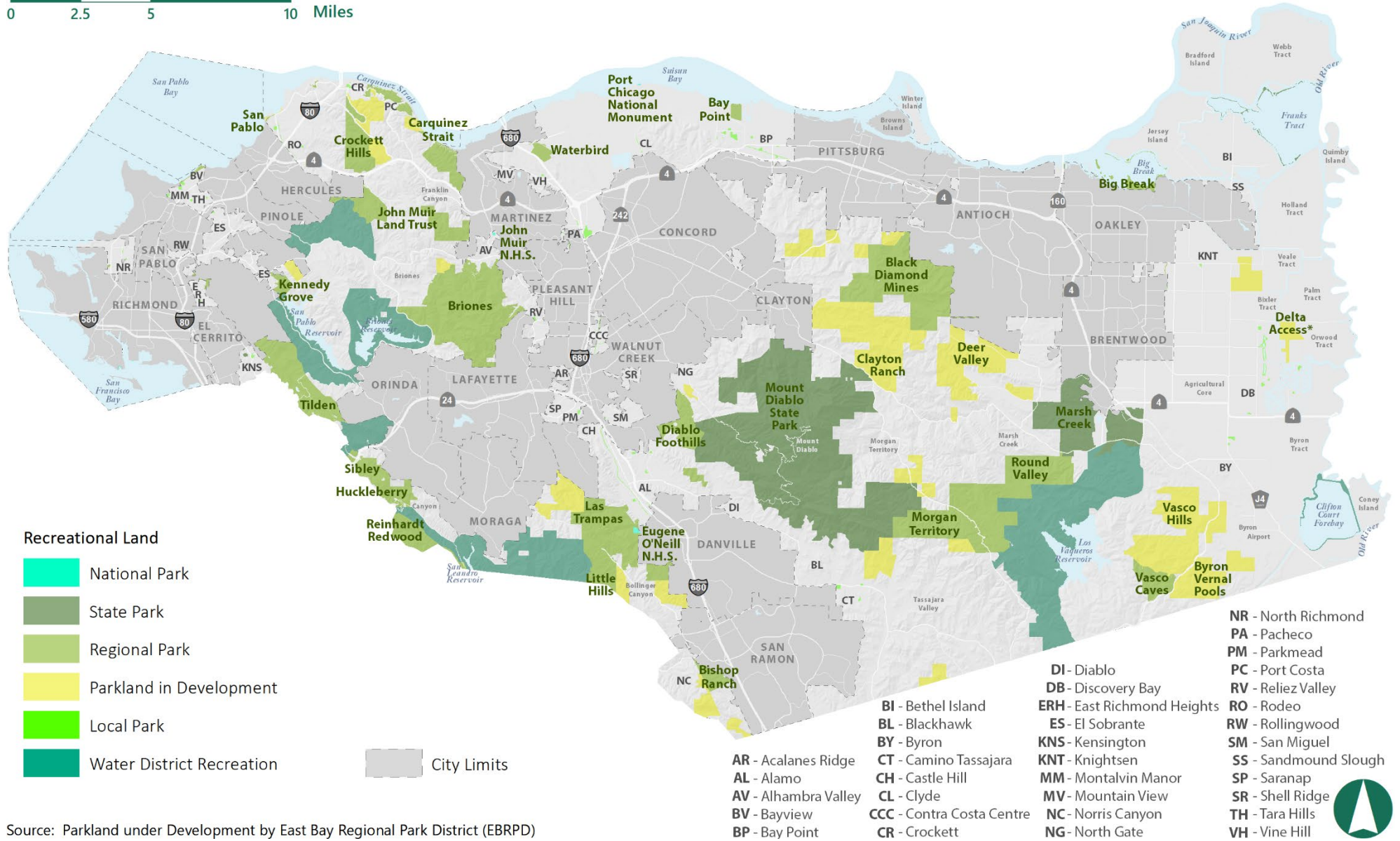
- **State and regional parks** provide a broad range of recreational opportunities, such as hiking, bicycling, horseback riding, fishing, swimming, camping, group sports, and ecological and cultural education. This category includes Mount Diablo State Park and Marsh Creek State Historic Park, which are owned and managed by the California Department of Parks and Recreation, as well as many regional parks owned and managed by the East Bay Regional Park District (EBRPD). In addition, EBMUD and CCWD offer recreational opportunities, such as hiking and fishing, as secondary uses within the watersheds of their reservoirs. The US National Park Service also operates the Port Chicago Naval Magazine National Memorial at Military Ocean Terminal Concord, John Muir National Historic Site in Martinez, and Eugene O'Neill National Historic Site just outside Danville.

- **Local parks** are indispensable elements of our neighborhoods and communities. They serve as focal points where people can exercise and enjoy leisure time together, and include sports courts, playgrounds, playfields, or other amenities. Local parks in unincorporated areas are typically owned and maintained by the County or a special district, such as a recreation and park district or community services district. The local park system is often augmented by similar facilities on school campuses. In some areas, private organizations such as homeowners' associations maintain parks for their communities, sometimes allowing public access.
- **Trails** are essentially linear parks. They provide safe connections between residential neighborhoods, parks, schools, and other destinations. Because of their connectivity, they also act as alternative commute routes in some communities, though typically they're restricted to pedestrian, bicycle, and micromobility use. Major regional trails in Contra Costa County include portions of the San Francisco Bay Trail, a 500-mile network of trails along San Francisco and San Pablo Bays that is managed collaboratively by several agencies, including the Metropolitan Transportation Commission/Association of Bay Area Governments, and EBRPD; portions of the 50-mile Carquinez Strait Scenic Loop Trail that is managed by the Bay Area Ridge Trail Council; and the 26-mile Iron Horse Regional Trail, 13.5-mile Contra Costa Canal Regional Trail, and 19-mile Delta de Anza Regional Trail managed by EBRPD. The county is also crisscrossed by innumerable smaller, local trails, many of which are unpaved and informal.

While not shown on Figure PFS-7, numerous parks within incorporated cities and towns are also available to residents of unincorporated areas.

FIGURE PFS-7 FEDERAL, STATE, REGIONAL, AND LOCAL RECREATION LANDS

0 2.5 5 10 Miles

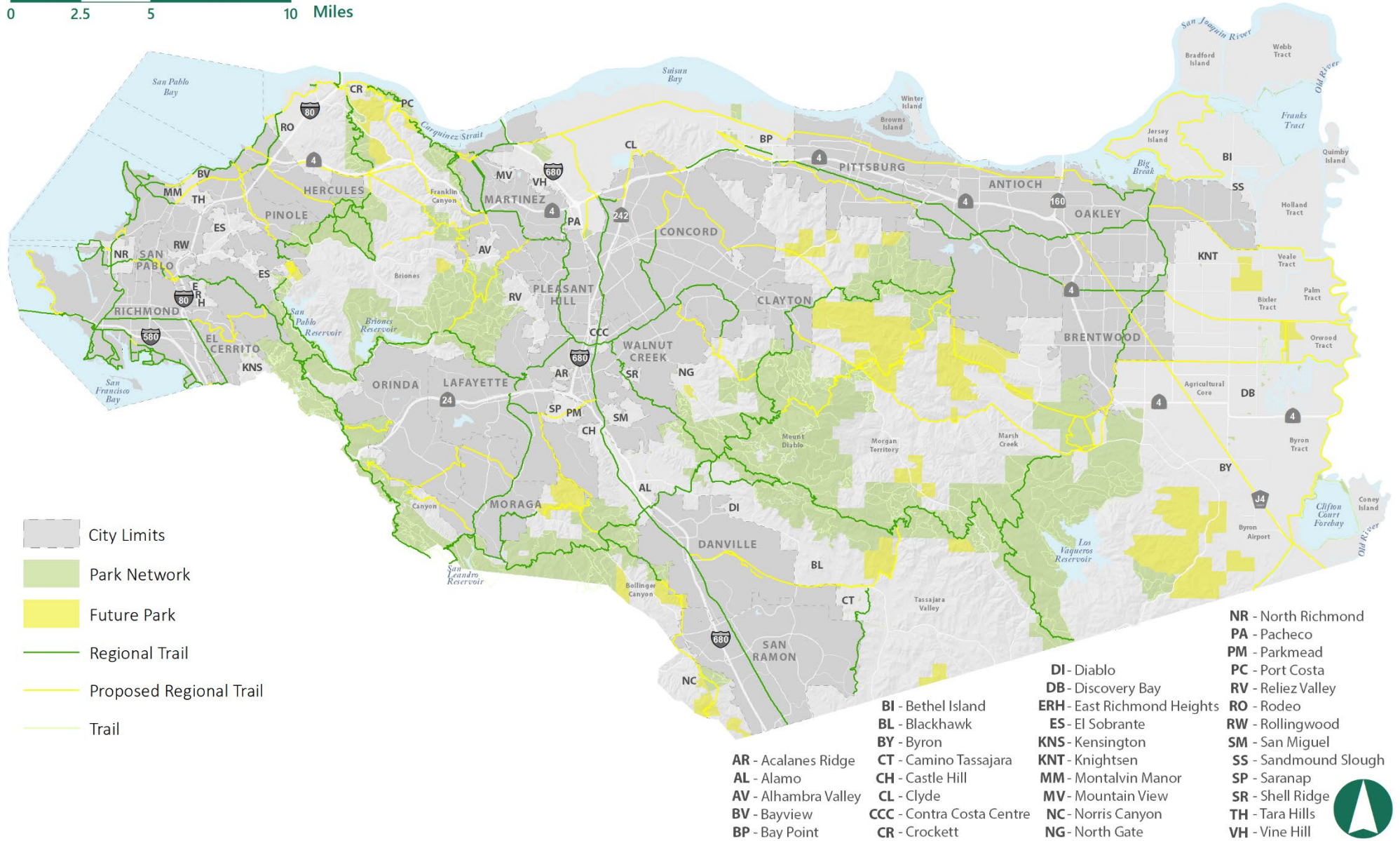








Source: Parkland under Development by East Bay Regional Park District (EBRPD)



FIGURE PFS-8 TRAILS NETWORK

0 2.5 5 10 Miles



-  City Limits
-  Park Network
-  Future Park
-  Regional Trail
-  Proposed Regional Trail
-  Trail

- AR - Acalanes Ridge
- AL - Alamo
- AV - Alhambra Valley
- BV - Bayview
- BP - Bay Point
- BI - Bethel Island
- BL - Blackhawk
- BY - Byron
- CT - Camino Tassajara
- CH - Castle Hill
- CL - Clyde
- CCC - Contra Costa Centre
- CR - Crockett
- DI - Diablo
- DB - Discovery Bay
- ERH - East Richmond Heights
- ES - El Sobrante
- KNS - Kensington
- KNT - Knightsen
- MM - Montalvin Manor
- MV - Mountain View
- NC - Norris Canyon
- NG - North Gate
- NR - North Richmond
- PA - Pacheco
- PM - Parkmead
- PC - Port Costa
- RV - Reliez Valley
- RO - Rodeo
- SS - Sandmound Slough
- SP - Saranap
- SR - Shell Ridge
- TH - Tara Hills
- VH - Vine Hill

The County coordinates with agencies at all levels of government to provide and maintain parks and recreational programs in unincorporated communities. The County administers and regularly updates the Parks Capital Improvement Program, which allocates funding to park projects and maintenance based on community priorities and budget availability. Park acquisition and development are also funded in part through the County's Parks Impact Fee, which is a fee charged to new residential projects. The fee amount is based on the project size, location, and type(s) of housing proposed.

Access to parks and open space is an important environmental justice issue. Impacted Communities, which are described in the Stronger Communities Element, often lack access to the range and quality of facilities that support a high quality of life and positive public health outcomes. This can be a significant driver of poor physical and mental health. It is important to correct this inequity by investing in Impacted Communities and ensuring that each resident has access to space for outdoor physical activity.



Ambrose Park provides play areas for children in Bay Point.

Park standards provide a means to ensure that parks and recreation facilities are provided as the county develops. The County strives to provide 3 acres of local parks per 1,000 residents. This standard is an important tool for requiring new development to provide facilities when parks to serve new residents are lacking nearby.

Goal PFS-8
An easily accessible, integrated system of high-quality parks and trails to meet the needs of all residents.

Policies

- PFS-P8.1**  Support development of a variety of local amenities that meet a diverse range of recreational needs, such as ballfields, all-abilities playgrounds, tot lots, spraygrounds, adult fitness courses, gymnasiums, swimming pools, sport courts, passive parks, pocket parks, urban gardens, and trails.
- PFS-P8.2**  Provide a local park within a safe 10-minute walk for all residents in urban communities or within a 5-minute drive for residents in suburban communities, as indicated in Figures PFS-9 and PFS-10.*



FIGURE PFS-9 PUBLIC PARK AND OPEN SPACE WALKABILITY FOR URBAN COMMUNITIES

0 2.5 5 10 Miles

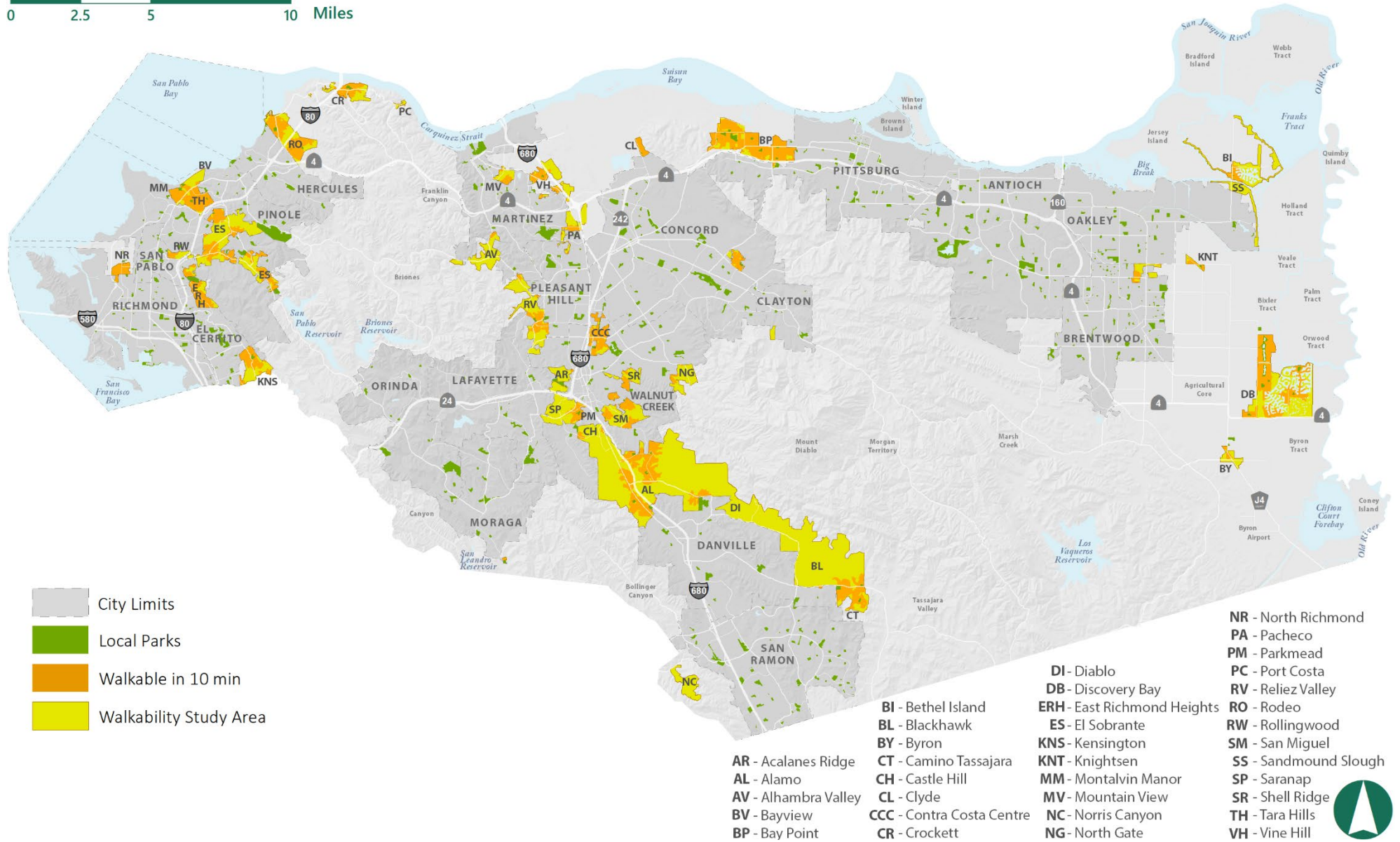
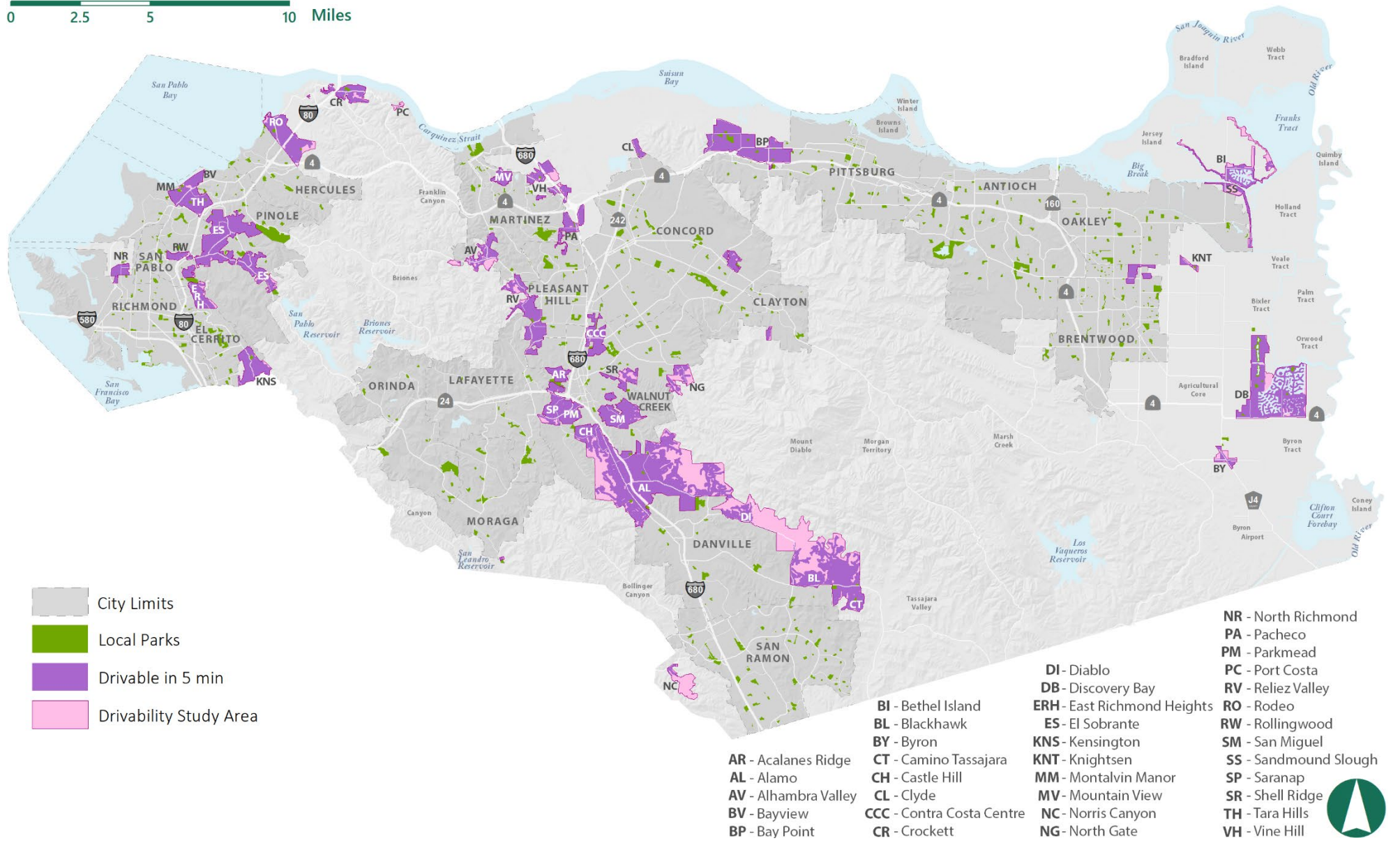


FIGURE PFS-10 DRIVE TIMES TO PUBLIC PARKS AND OPEN SPACE FOR SUBURBAN COMMUNITIES


0 2.5 5 10 Miles





PFS-P8.3  
Increase access to diverse, high-quality parks, green space, recreational facilities, trails, and natural environments for residents of Impacted Communities, including through multiple transportation modes. Partner with other agencies and non-governmental organizations to obtain funding, and design and maintain these facilities to offer a safe and comfortable environment for residents of all ages and abilities.


PFS-P8.4  
Prioritize and promote recreational activity programs and opportunities in Impacted Communities.


PFS-P8.5 
Whenever possible, require projects subject to the Park Dedication or Park Impact Fee Ordinances to develop park and recreation amenities listed in, or added to, the County's Park Capital Improvement Plan. Park Impact fees or in-lieu fees should be assessed when the County determines developer improvements are not feasible.*

PFS-P8.6  
Support expanded access to recreation opportunities by working with other agencies to co-locate parks and trails with public facilities, such as schools and utility easements, with Impacted Communities prioritized.

PFS-P8.7  
Design recreational facilities to complement the natural features of the area, including topography and vegetation, whenever appropriate.

PFS-P8.8 
Support expanded public access to the waterfront and development of water-related recreational opportunities, such as fishing and boating.

PFS-P8.9 
Support development of a comprehensive and interconnected network of trails, including intra- and inter-regional trails like the San Francisco Bay Trail, Carquinez Strait Scenic Loop Trail, Great California Delta Trail, and Marsh Creek Corridor Trail, that provides public access to shorelines, ridges, and other scenic areas, connects residents with open space and nature, and links urban areas with parks and other recreational facilities.

PFS-P8.10 
Encourage use of abandoned railroad rights-of-way for trails or other public purposes and participate in collaborative planning processes to determine the best use of abandoned rail corridors.

PFS-P8.11  
Support local community groups and volunteer organizations in efforts to improve and maintain local parks, trails, and other public spaces, such as through an Adopt-A-Park/Trail program, especially in Impacted Communities.

Actions

PFS-A8.1 
Create an internal County entity that works across departments and non-County agencies to coordinate

planning and funding of unincorporated local parks, recreational facilities, and trails.

PFS-A8.2



Coordinate with recreation and park districts and cities to prepare a parks and open space needs assessment for all unincorporated communities, prioritizing Impacted Communities. Integrate the results of the assessment into a Parks Master Plan and the Parks Capital Improvement Program and implement improvements that address barriers to outdoor physical activity, such as inadequate infrastructure and safety concerns.

PFS-A8.3



Annually update park dedication and in-lieu fee requirements based on the Consumer Price Index for All Customers, All Items for the San Francisco-Oakland-San Jose Metropolitan Area to accommodate for increases or decreases in development costs. Conduct a fee study at least once every 10 years to reflect changes in the cost of land, local park and recreational needs, and development conditions.*

PFS-A8.4



Maintain up-to-date maps showing quarter-mile and half-mile walking distances and five-minute driving times to public parks.

PFS-A8.5

Study the feasibility of developing an equestrian trail network throughout the county's rural areas.

SCHOOLS

Good schools are the building blocks of vibrant, healthy communities. Communities with good schools are great places to raise families, and a good education system not only attracts new residents, but also encourages young people to remain in the community as they start their own families. Good schools are also economic development drivers, as businesses are attracted to communities where employees will have access to quality education for their families. The 18 school districts providing K-12 public education that serve Contra Costa County are shown on Figure PFS-11.

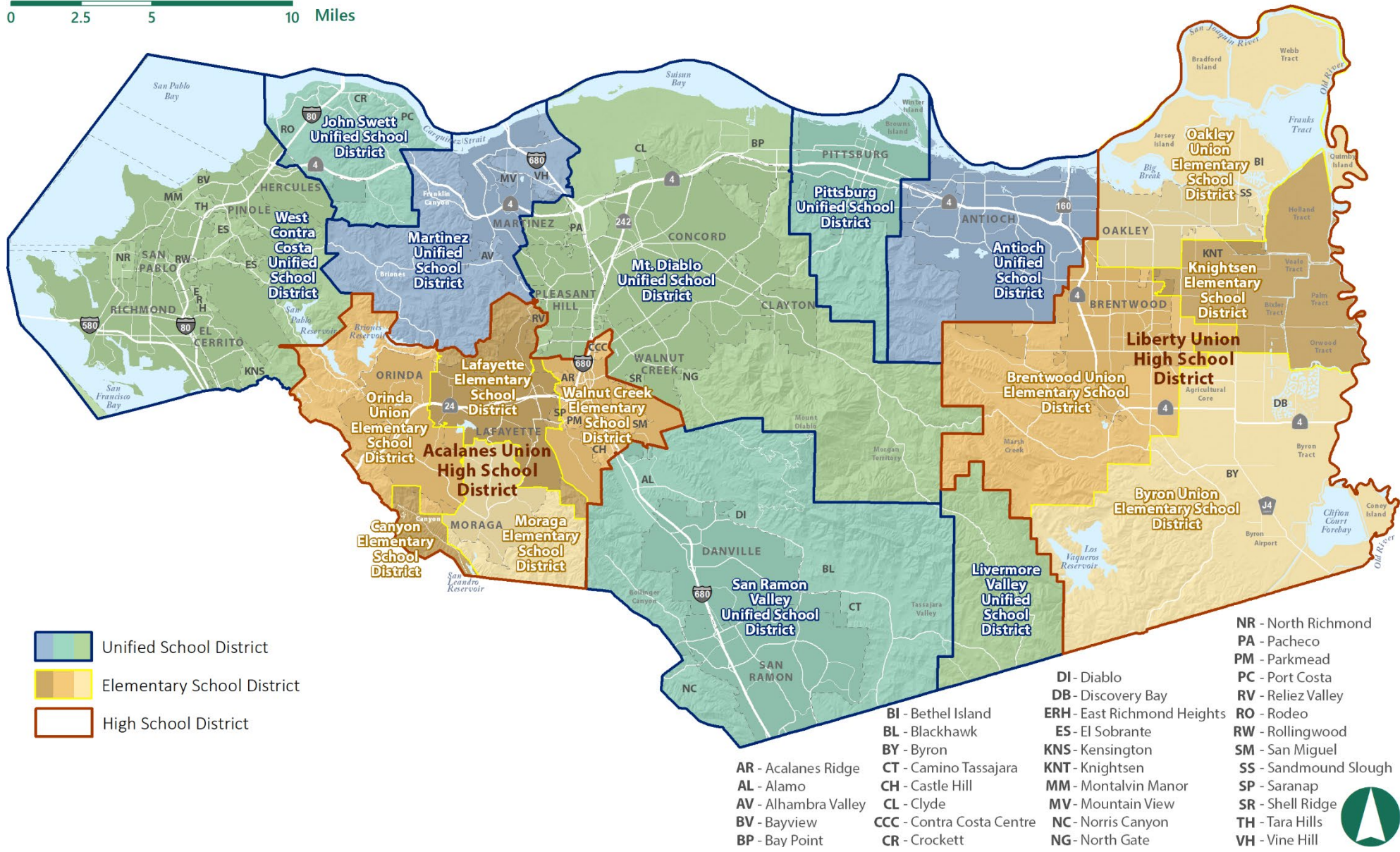


Verde Elementary School in North Richmond is one of many schools operated by the West Contra Costa Unified School District.



FIGURE PFS-11 SCHOOL DISTRICTS

0 2.5 5 10 Miles



Colleges and universities also play an important role in community life. Aside from the direct contributions they make to the local economy as large employers, post-secondary educational institutions provide critical workforce development and training through partnerships with local businesses and community groups. Post-secondary public education in Contra Costa County is offered at California State University, East Bay – Concord Campus and three community colleges: Contra Costa College in San Pablo; Diablo Valley College in Pleasant Hill, with a satellite campus in San Ramon; and Los Medanos College in Pittsburg. Numerous public and private colleges and universities, including prestigious institutions like the University of California, Berkeley and Stanford University, are also within 50 miles of Contra Costa County, providing county residents with extraordinary opportunities to pursue higher education.

Goal PFS-9
Primary, secondary, and higher education facilities that serve the varied educational needs of all county residents.

Policies

PFS-P9.1

When reviewing new development proposals, coordinate with affected school districts to ensure adequate school capacity is or will be available, school sites are designated or dedicated if necessary, and adequate access is provided.*

PFS-P9.2

Encourage dedication of school sites through density transfer of the dedicated acreage or other incentives.



PFS-P9.3

Encourage school districts to use school sites for multiple community purposes, such as recreation, and to locate new schools in conjunction with and/or adjacent to parks and trails.

PFS-P9.4

Oppose efforts by school districts to locate new schools outside the Urban Limit Line.

PFS-P9.5

Support efforts to enhance and expand access to higher education.

Actions

PFS-A9.1

Amend County Ordinance Code Title 8 – Zoning and Title 10 – Public Works and Flood Control to regulate public school siting and construction of off-site improvements related to public schools, to the extent allowable under Government Code Sections 53094 and 53097. Ensure these amendments include requirements for roadway improvements, including complete streets and multimodal roadway conditions.

See the Stronger Communities Element for policies and actions related to workforce development.

LIBRARIES

Libraries are some of the oldest and most important public institutions. They provide access to knowledge and enhance public literacy. The Contra Costa County Library works in partnership with the incorporated cities and towns to operate 26 libraries across the county, offering robust programming for all ages, preschool to adults, including English as a Second Language (ESL), Science, Technology, and Mathematics (STEM) courses for kids, technology and computer help, interactive educational performances, arts and crafts events, book clubs, free lunches for children, and other programs. Residents can also reserve group study rooms and meeting rooms for educational, cultural, and community-related meetings, programs, and activities.



Local libraries provide access to numerous education resources and programs.

Goal PFS-10

Library services that meet the informational and social needs of county residents.

Policies

PFS-P10.1



Prioritize expansion of library services in Impacted Communities.

PFS-P10.2



Locate and design library facilities to provide access to the greatest number of people. Ensure they are sited in areas with broadband internet and close to public transit.

PFS-P10.3

Provide adequate funding for maintaining and improving library operations.*

Actions

PFS-A10.1

Develop library service and facility standards, identify standards not being met, and seek necessary resources to achieve those standards.*



PFS-A10.2

Adopt a library impact fee to ensure new development mitigates its impact on library services.*

PUBLIC FACILITIES AND SERVICES ELEMENT PERFORMANCE MEASURES

To track progress in achieving the major goals of this Element, every five years, the County will collect data to assess its performance against the following measures. Progress will be tracked relative to the prior performance review and the baseline year of 2024. Based on the findings from the five-year review, the County may adjust policies, actions, or the approach to implementing them to improve performance, as needed.

- More dollars invested per capita on public improvements in Impacted Communities than in other parts of the county.
- Fire suppression incidents responded to with the first engine company within four minutes or less, with the second engine company within six minutes or less, and with the initial full alarm assignment within eight minutes or less (or 10 minutes and 10 seconds if it involves a high-rise building), 90 percent of the time. Emergency medical service incidents responded to with a unit with a first responder within four minutes or less and with an advanced life support company within eight minutes or less, 90 percent of the time.
- Increased percentage of homes within a 10-minute walk of a local park.
- At least 3 acres of local parkland per every 1,000 residents.
- Reduced number of illegal dumping incidents.



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From: [Tanya Sundberg](#)
To: [Lauren Willey](#)
Subject: FW: ENVISION CONTRA COSTA 2040 ~ Letter of Comment
Date: Thursday, April 18, 2024 5:46:46 PM
Attachments: [image001.jpg](#)
[image002.png](#)

TANYA SUNDBERG

Principal

she/her

510.848.3815 ext. 3390 | cell: 510.866.8336

From: Will Nelson <Will.Nelson@dcd.cccounty.us>
Sent: Thursday, April 18, 2024 11:08 AM
To: Tanya Sundberg <tsundberg@placeworks.com>
Subject: FW: ENVISION CONTRA COSTA 2040 ~ Letter of Comment

GP comment



William R. Nelson
Principal Planner
Contra Costa County
Department of Conservation and Development
30 Muir Road, Martinez, CA 94553
Phone (925) 655-2898
Web www.contracosta.ca.gov

**We're planning for the future of Contra Costa County.
Learn more and get involved at envisioncontracosta2040.org.**



This message was sent from a public e-mail system and may be subject to disclosure under the California Public Records Act.

From: jagktac@goldstate.net <jagktac@goldstate.net>
Sent: Tuesday, January 9, 2024 5:31 PM
To: Will Nelson <Will.Nelson@dcd.cccounty.us>

Cc: 'Carol Jensen' <cajensen@pacbell.net>; 'Lori Abreu' <loriabreu10@gmail.com>;
igonzo@goldstate.net

Subject: ENVISION CONTRA COSTA 2040 ~ Letter of Comment

Dear Mr. Nelson

I am a resident of Knightsen. I have lived in east county for close to 40 years. I have participated and studied Knightsen for most of these years. I can tell you through many votes, correspondences, opinions, and surveys that the Knightsen Residents are adamant on keeping Knightsen rural for small farms, history, equestrian use, etc. Also, Knightsen is the home to several endangered species such as the Burrowing Owl, the Swensen Hawk, Red Legged Frog, Grey Fox, and others small species. Farming in Knightsen produces Milk, Hay, Alfalfa, Honey, corn, tomatoes, asparagus, onions, and many other farm varieties of food for the public.

I would like to comment on your brochure that Southern Pacific Railway is spoken of yet has been absent for 40 years in far east county. ATSF Railway, Sante Fe, and now BNSF Railway has run through Knightsen and East County for 125 years. It still operates today in East County. Also, the mention of historic places in the Brochure yet fails to note that Knightsen is on the Contra Costa Historical inventory. The Town is Historic and is recognized by the Board of Supervisors and Community Development. East Bay Regional Parks has and is in the process of recreating wetlands in Knightsen.

For all these reasons and many more the 2040 vision should continue to protect Knightsen from rampant growth that would deteriorate the historic and natural habitat it sustains that is so important to Contra Costa County..

I am always available for discussion and or participation in this highly important future decision for Knightsen. I pride myself in owning the largest documentation and photographs from Knightsen's start at the turn of the century to today. In Closing it is also imperative to maintain the " Urban Limit Line " as is. Several agencies and groups have attempted to circumvent this voter approved boundary. It's strength and respect has assisted in controlling East County rampant growth.

Thank you,
Sincerely,

John A Gonzales
P.O. Box 369
Knightsen, Ca 94548

Cell 925-260-4728
JAGKTAC@Goldstate.net

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Climate Action Plan comments
Date: Wednesday, January 10, 2024 11:11:17 AM

From: Marcia L. <marcia2799@hotmail.com>
Sent: Wednesday, January 10, 2024 11:11:06 AM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Climate Action Plan comments

You don't often get email from marcia2799@hotmail.com. [Learn why this is important](#)

I want a moratorium in place to prevent more permit approvals for oil and gas wells while a feasibility study is conducted and concluded with recommendations. . please add a requirement for regular and periodic monitoring of existing oil and gas infrastructure by staff of methane and other dangerous emissions.

Marcia Liberson,
Walnut Creek CA

From: Email Request
Sent: Monday, January 15, 2024 10:50 AM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Oil and gas drilling

From: Jennifer Russell <jenrae54@icloud.com>
Sent: Monday, January 15, 2024 10:50:09 AM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request
Subject: Oil and gas drilling

[You don't often get email from jenrae54@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I'm encouraged by the steps the country is taking to stop oil and gas drilling in my county. I'm writing to ask that a moratorium be placed on new drilling while the new policy is being put in place.

Also, current research shows that a 3,200 foot setback is on the low end of a protective distance and should be increased.

Lastly, please add a requirement for regular, periodic monitoring of existing oil and gas infrastructure by County Hazardous Materials staff of methane and other dangerous emissions.

Thank you for considering these comments.

Jennifer Russell
178 Kendall Road
Walnut Creek CA 94595

From: jagktac@goldstate.net <jagktac@goldstate.net>

Sent: Tuesday, January 16, 2024 2:19 PM

To: Will Nelson <Will.Nelson@dcd.cccounty.us>

Subject: FW: ENVISION CONTRA COSTA 2040 ~ Letter of Comment ~ Added important information attached

Dear Mr. Nelson,

I would like to add a few more very important interests of far east county residents for the 2040 plan envision.

First, Based on the constant flooding and traffic issues facing the unincorporate roads and the commute routes from cities through the ag core, I have attached a map of an alternate route for commerce traffic and commuters. The benefit for all would be enormous. While Oakley and Discovery Bay are growing rapidly and both depend on employment and revenue, linking them through the " Bixler Bypass" (attached concept) people can traverse east to Hwy 4 and west to Hwy 4 and Hwy 160 without cutting through farm lands with substandard roads. This allows growth and preservation of farmlands, wetlands, and rural use to work together. At the same time by raising the bypass elevation and creating a sort of levee can also collect and convey the flood waters that plague the Ag Core and Knightsen for the last 100 years (I have an extensive photo collection and map collection dating many years back for far east county). This concept can be paid for through several sources such as Clean Water money, Flood Money, Levee Money, Road funds, and Development funds. Federal, State and local funds are available to joint venture this future solution to preservation and orderly growth for the East end of the County.

Second, While East Bay Regional Parks is playing a larger role in Far East County, the Equestrian community along with cycling, and trails are in dire need to share with urban and rural life. The map attached was generated through meetings and work shop groups a few years back. All that is needed is a landbank lead agency to carry the operation and maintenance. The equestrian community in Contra Costa generates several millions of dollars in revenue for the county. Working together with the urban growth while preservation is kept, can only provide quality of life improvements to all residents of the County.

Please add these documents to your comments and files for consideration. I am confident thinking through the suggestions will result in a win-win for everyone's vision 2040.

Thank you again, and feel free to contact me or access the information I have collected in the past 40 years.

John A Gonzales
PO Bx 369
Knightsen, Ca. 94548

925-260-4728

Dear Mr. Nelson

I am a resident of Knightsen. I have lived in east county for close to 40 years. I have participated and studied Knightsen for most of these years. I can tell you through many votes, correspondences, opinions, and surveys that the Knightsen Residents are adamant on keeping Knightsen rural for small farms, history, equestrian use, etc. Also, Knightsen is the home to several endangered species such as the Burrowing Owl, the Swensen Hawk, Red Legged Frog, Grey Fox, and others small species. Farming in Knightsen produces Milk, Hay, Alfalfa, Honey, corn, tomatoes, asparagus, onions, and many other farm varieties of food for the public.

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For all these reasons and many more the 2040 vision should continue to protect Knightsen from rampant growth that would deteriorate the historic and natural habitat it sustains that is so important to Contra Costa County..

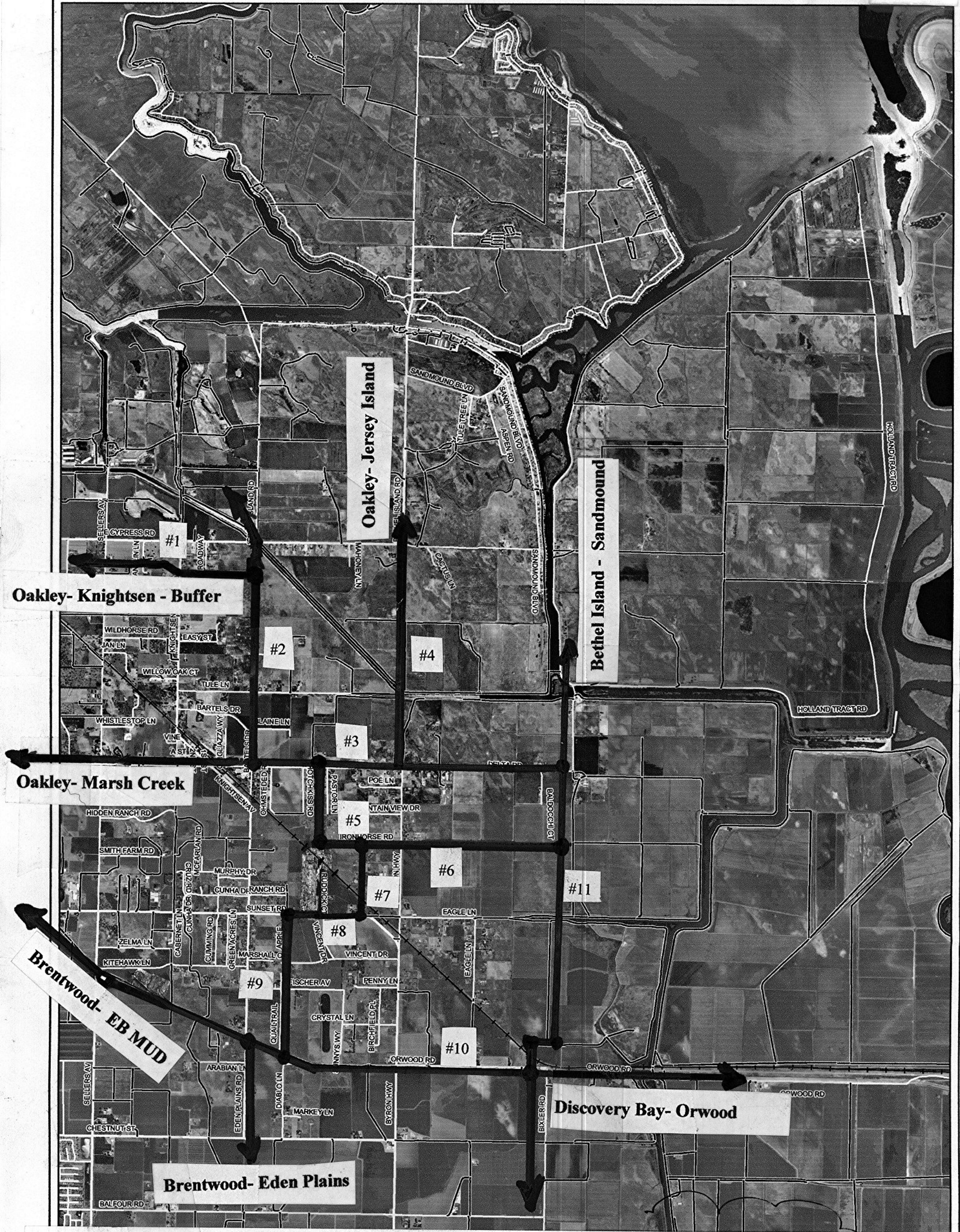
I am always available for discussion and or participation in this highly important future decision for Knightsen. I pride myself in owning the largest documentation and photographs from Knightsen's start at the turn of the century to today. In Closing it is also imperative to maintain the " Urban Limit Line " as is. Several agencies and groups have attempted to circumvent this voter approved boundary. It's strength and respect has assisted in controlling East County rampant growth.

Thank you,
Sincerely,

John A Gonzales
P.O. Box 369
Knightsen, Ca 94548

Cell 925-260-4728
JAGKTAC@Goldstate.net

Knightsen and Surrounding Area



Final 3/23/04

Knightsen Area Trail Plan

Knightsen Trails Map

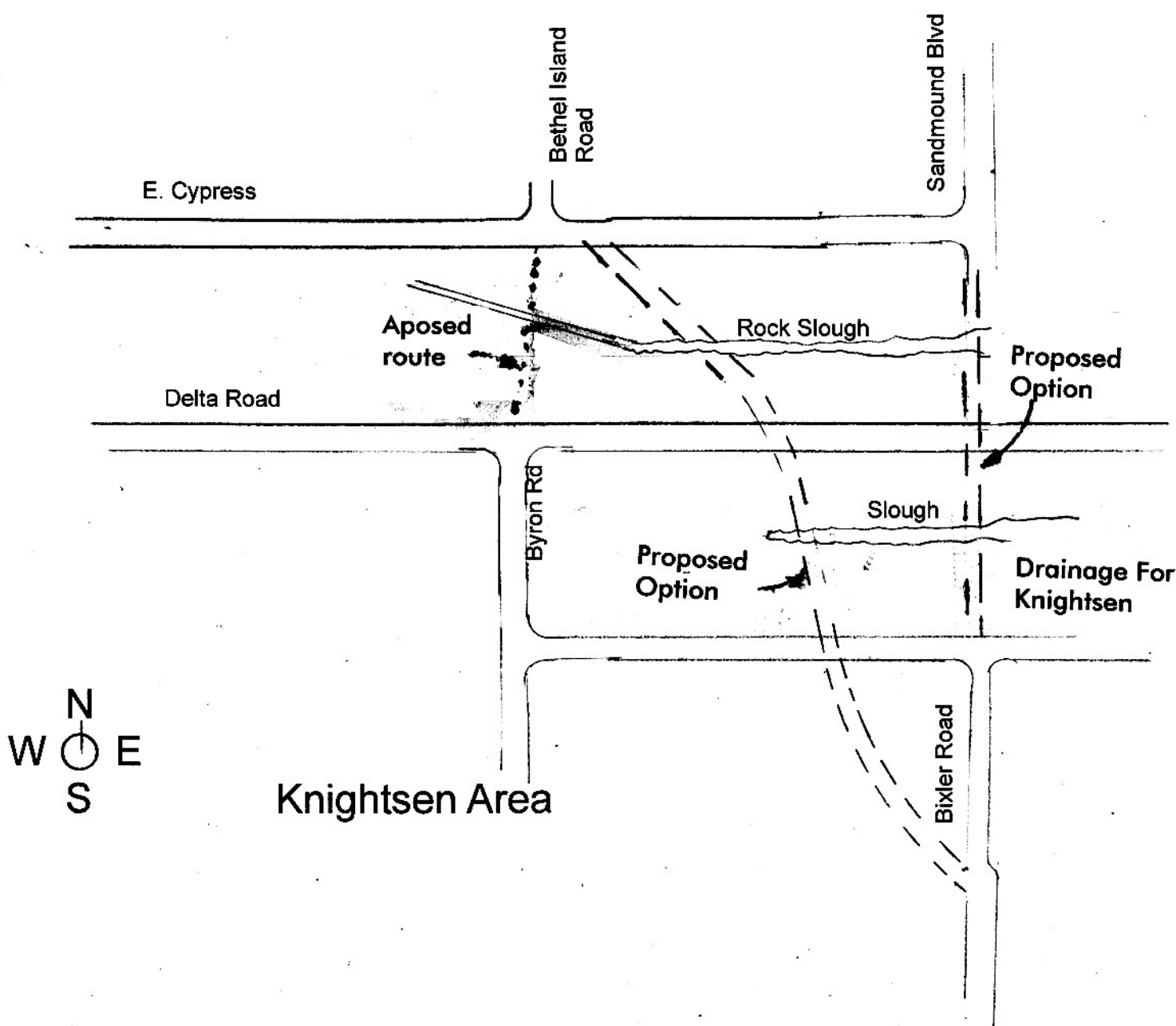
SUGGESTED TRAIL LOCATIONS

Use in cooperation with attached map Knightsen Area Trail Map

- #1 Buffer area use Oakley - Knightsen Buffer Agreement of 225-0
Use South Side of future City Limit
- #2 Eden Plains- Use East Side
- #3 Delta Rd. -- Use North Side
- #4 Byron Highway -- Use East Side
- #5 Pastor Lane --- Use East Side
- #6 Ironhorse Rd --- Use South Side
- #7 Ironhorse Ct. --- Use East Side
- #8 Sunset Road ---- Use North Side
- #9 Quail Trail --- Use East Side
- #10 Orwood Road - Use North Side of East Bay MUD
- #11 Sandmound to Disco Bay -- Either Side (undeveloped)

3/23/04





From: Email Request
Sent: Monday, January 22, 2024 1:54 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Keller Canyon

From: Rosa Fallon <rosafallon@gmail.com>
Sent: Monday, January 22, 2024 1:53:23 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request
Cc: action@sunflower-alliance.org
Subject: Re: Keller Canyon

[You don't often get email from rosafallon@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Sent from my iPad

> On Jan 22, 2024, at 1:18 PM, Rosa Fallon <rosafallon@gmail.com> wrote:
>
>
> Please keep the landfill away from housing.
>
>

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Climate Action Plan comments
Date: Monday, January 22, 2024 7:21:58 AM

From: Susanna M <susannamarshland@gmail.com>
Sent: Monday, January 22, 2024 7:21:20 AM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Climate Action Plan comments

You don't often get email from susannamarshland@gmail.com. [Learn why this is important](#)

Hi Plan authors and decision-makers,

I was pleased to learn that the creation of a new land use ordinance to prohibit development of new oil and gas wells and phase out existing oil and gas well operations is (hopefully) in our future. I hope that a moratorium on new permit approvals can be put in place as you develop this new ordinance. I know new policies take a while to draft, approve, and enact, and hope that you will do your best to maximize protection for Contra Costa and neighboring communities from the health and safety dangers of oil and gas drilling in the meantime.

Setbacks from wells are good, and larger setbacks are better, but a ban would be best and I encourage you to take every possible step in that direction.

To hold ourselves accountable to protecting local health and safety, I encourage county staff and regulators to engage in regular, periodic monitoring of methane and other dangerous emissions at existing oil and gas infrastructure.

Thank you for your tireless work to pursue a clean energy future that is healthy for all our residents.

Susanna Marshland, 49 Avon Rd, Kensington, CA 94707

I live and work on unceded Lisjan Ohlone land in the territory of Huchiun. As a non-Native person, I pay [Shuumi](#) voluntary land tax.

From: Email Request
Sent: Tuesday, January 23, 2024 11:31 AM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Comments on Envision Contra Costa 2040
Attachments: Comments on envision Contra Costa 2040.pdf

From: Bill Boaman <bboaman@msn.com>
Sent: Tuesday, January 23, 2024 11:31:01 AM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Cc: Will.Nelson@dcd.cccounty.us <Will.Nelson@dcd.cccounty.us>
Subject: Comments on Envision Contra Costa 2040

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Please see attached Comment Card.

I have lived across the street from the proposed 5 acre development site since 1981. Since that time they have built one apartment complex after another because of the proximity to PH BART. For example to name a few, Avalon Walnut Ridge, Bay Landing Apartments, Coggins Square, Hanover, Habit for Humanity (still not completed). The building of these high density developments has caused endless disruption in the neighborhood, as some have taken years to build. I understand that the County now wants to approve high density housing on the five acre parcel directly across from my property and that beginning in 2025, the Envision Contra Costa 2040 General Plan will dictate what developers can build. There are no curbs and gutters on an already narrow street with a blind corner. Where they have built curbs, the apartment dwellers park on the curb 24/7 and they don't even leave for the street sweepers. Traffic is also a problem because since the curbs are always full. Delivery drivers such as Amazon, Door Dash, UPS, FedEx then double park to make their deliveries. I moved to this area because of the trees, spacious lots, and the feel of the country setting. It was the charm and character of the area. Now, you want me to wake up and look out the window to a five story building, with cars that line the curb and tenants outside loitering on the sidewalk smoking cigarettes and delivery cars and trucks blocking access to the road. Just last week all four tires were stolen off a car parked at the curb in front of the existing apartments at the end of our street. I believe the charm this area has will be diminished with the high density of 60 units per acre. I am not even comfortable with 18-30 units per acre. How many apartment complexes in the area will be enough? Previous developments have required access from newly built roads; will this be the case on Cherry Lane, or will access be granted from Cherry Lane? I think every effort should be made to preserve the remaining alluring character of Cherry Lane. Thank you for your consideration.

William E. Boaman

2970 Cherry Lane
Walnut Creek, CA 94597

Sent from [Mail](#) for Windows



ENVISION CONTRA COSTA 2040

COMMENT CARD

Date: 1/23/2024

Please fill out this form if you have any comments about the General Plan, Zoning Code, and/or Climate Action Plan Updates. (Name and contact information are optional).

Name: William E. Boaman

Affiliation: _____

Address: 2970 Cherry Lane, Walnut Creek, CA 94597-2115

Phone / Email: (925) 933-9336 / bboaman@msn.com

Comments (Use back if necessary): I have lived across the street from the proposed 5 acre development site since 1981. Since that time they have built one apartment complex after another because of the proximity to PH BART. For example to name a few, Avalon Walnut Ridge, Bay Landing Apartments, Coggins Square, Hanover, Habitat for Humanity (still not completed). The building of these high density developments has caused endless disruption in the neighborhood, as some have taken years to build. I understand that the County now wants to approve high density housing on the five acre parcel directly across from my property and that beginning in 2025, the Envision Contra Costa 2040 General Plan will dictate what developers can build. There are no curbs and gutters on an already narrow street with a blind corner. Where they have built curbs, the apartment dwellers park on the curb 24/7 and they don't even leave for the street sweepers. Traffic is also a problem because since the curbs are always full. Delivery drivers such as Amazon, Door Dash, UPS, FedEx then double park to make their deliveries. I moved to this area because of the trees, spacious lots, and the feel of the country setting. It was the charm and character of the area. Now, you want me to wake up and look out the window to a five story building, with cars that line the curb and tenants outside loitering on the sidewalk smoking cigarettes and delivery cars and trucks blocking access to the road. Just last week all four tires were stolen off a car parked at the curb in front of the existing apartments at the end of our street. I believe the charm this area has will be diminished with the high density of 60 units per acre. I am not even comfortable with 18-30 units per acre. How many apartment complexes in the area will be enough? Previous developments have required access from newly built roads; will this be the case on Cherry Lane, or will access be granted from Cherry Lane? I think every effort should be made to preserve the remaining alluring character of Cherry Lane. Thank you for your consideration.

From: Email Request
Sent: Friday, January 26, 2024 3:28 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: General Plan & Climate Plan Comments - Extended Deadline?

From: Heather Rosmarin <hrosmarin@mac.com>
Sent: Friday, January 26, 2024 3:27:57 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request
Subject: General Plan & Climate Plan Comments - Extended Deadline?

[You don't often get email from hrosmarin@mac.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Envision Contra Costa Team - I received an email from Supervisor Carlson stating that the comment period has been extended on the draft General Plan and Climate Plan. Could you please let me know the extended deadline? (I don't see it on the website)

Thank you!
Heather Rosmarin
Co-Founder, Friends of Pleasant Hill Creeks

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Comment on BOS agenda item D.4
Date: Friday, January 26, 2024 2:47:22 PM

From: Kevin Burke <kevin@burke.dev>
Sent: Friday, January 26, 2024 2:47:02 PM (UTC-08:00) Pacific Time (US & Canada)
To: clerkoftheboard@cob.cccounty.us <clerkoftheboard@cob.cccounty.us>; [Email Request](#) <email@envisioncontracosta2040.org>
Subject: Comment on BOS agenda item D.4

You don't often get email from kevin@burke.dev. [Learn why this is important](#)

Hi,

I'd love to hear some discussion from the Board of the financial impacts from the 2045 General Plan, which put a disproportionate amount of the County's rezoned land in low income communities of color with high levels of pollution. As an example, most of the single family areas in North Richmond, adjacent to the Chevron refinery, are being rezoned for 30 homes per acre. Alamo, Diablo, Blackhawk, and the San Miguel CDP mostly have 3 units per acre single family zones.

Increasing zoned capacity in areas with lower land values means that redevelopment contributes fewer tax dollars to the County per acre than more dense development in a wealthy area. Further, these areas typically have higher levels of ER visits for heart attacks and asthma. Babies are more likely to be born underweight, which can cause lifelong learning problems - another increased source of expense - in addition to health problems. Due to asthma, the [students miss more days of school due to health problems, and are more likely to drop out before graduating high school](#), which can affect their lifetime earning potential.

I can speak from experience here - I had (fortunately, mild) asthma as a child in Alamo. If I lived next door to the County's hazardous waste facility, it would likely have been a lot worse - I would probably have missed a lot more school due to health problems. I might not have grown to be six feet tall. More people should have the opportunity that I had.

Increasing the zoned density in unpolluted areas - in greater quantities than currently proposed in the General Plan - would allow more residents to live in a place where they are relatively less bothered by health problems, which will reduce the County's exposure to pollution related hospital bills and school underperformance. Because these areas have higher land values, this would also increase the amount of property tax revenue available to reinvest in environmental or social justice programs.

Thank you,
Kevin Burke

From: Email Request
Sent: Monday, January 29, 2024 2:39 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Draft 2045 General Plan

From: Linda Waldroup <lindawaldroup@yahoo.com>
Sent: Monday, January 29, 2024 2:38:45 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request
Subject: Draft 2045 General Plan

[You don't often get email from lindawaldroup@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I wish to voice my support for:

***Banning all new oil and gas drilling and phasing out existing sites

***Increasing the required setback between wells and sensitive areas such as schools and hospitals

***Better monitoring of toxic emissions such as methane

As a longtime docent at the John Muir National Historic Site in Martinez I have welcomed many Contra Costa County residents. They come to the site to get closer to the life of our nation's most prominent conservationist. They care deeply about their environment, and as a mother and a grandmother, I worry much about the future. We must take measures to protect the climate!

Sincerely,

Linda Waldroup, Walnut Creek

Sent from my iPad

From: Email Request
Sent: Tuesday, January 30, 2024 5:43 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Contra Costa Country Climate Action Plan + 2045 General Plan

From: Lucas Richard <lucasrcarvajal@gmail.com>
Sent: Tuesday, January 30, 2024 5:42:43 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Contra Costa Country Climate Action Plan + 2045 General Plan

You don't often get email from lucasrcarvajal@gmail.com. [Learn why this is important](#)

Hello!

I am reaching out to thank the County staff for your commitment to the ordinance calling for a fossil fuel drilling ban and phase out. Additionally, I would like to call on Contra Costa county to continue this commitment with a moratorium to prevent permit approval as the new ordinance is developed.

Regarding the actual details of the document, I want to remind staff that the 3,200 foot setback from drilling sites is at the lower end of the range of distances that reduce harmful health impacts and call upon them to review this distance and extend it. Finally, regular, periodic monitoring of methane in the county should be enforced to better determine how the existing oil and gas infrastructure is impacting public health.

I appreciate the commitment shown for climate action and look forward to seeing further action in the future!

Much appreciated,
Lucas

From: Email Request
Sent: Tuesday, January 30, 2024 6:27 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Contra Costa County Climate Action Plan

From: Stephanie Stewart <steph.stewart02@gmail.com>
Sent: Tuesday, January 30, 2024 6:27:13 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Contra Costa County Climate Action Plan

You don't often get email from steph.stewart02@gmail.com. [Learn why this is important](#)

To Whom It May Concern:

I first wanted to thank you for your work to include the prohibition of new oil and gas wells and phase out of existing operations in the climate action plan. In line with this commitment, there are several other items that would build upon this work to ensure the climate action plan best serves Contra Costa County residents.

While the new land ordinances are developed, Contra Costa County should issue a moratorium on permit approvals to ensure that no soon-to-be-stranded assets are needlessly developed. Additionally, the 3200' setbacks should at least be increased, as 3200' is at the lower end of the distance required to avoid harmful health impacts. The only assured way to protect the health of residents is to stop drilling entirely, but at the very least periodic monitoring of damaging emissions originating from existing oil and gas facilities should be mandated.

Best,
Stephanie Stewart

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: comment on climate action plan
Date: Tuesday, January 30, 2024 5:55:25 PM

From: nancycampbell323 <nancycampbell323@proton.me>
Sent: Tuesday, January 30, 2024 5:55:10 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: comment on climate action plan

You don't often get email from nancycampbell323@proton.me. [Learn why this is important](#)

Hello Contra Costa County staff!

Thank you for working to protect us from the health hazards of oil & gas production. As a California resident in an unincorporated area of the state, and I am thrilled you are setting the precedent of undertaking a feasibility study, creating a new land use ordinance to prohibit development of new oil and gas wells, and phasing out existing oil and gas well operations.

However I believe you can and should do more. For example:

- + Put a moratorium in place to prevent any more permit approvals while the new ordinance is developed.
- + Set a ban on oil and gas drilling, period! But at VERY least, increase the setbacks beyond 3200 feet. Why? A 2021 [Stanford study](#) found negative health impacts within a 2.5 mile radius from oil and gas facilities. The [state investigatory panel](#) that declared 3,200' setbacks the minimum protective distance also found that the most health-protective approach is actually no drilling at all.
- + Increase emission monitoring!! Please add a requirement for regular, periodic monitoring of methane and other dangerous emissions at existing oil and gas infrastructure.

Thank you for helping us realize a safe and just future for all.

Best,
N

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: comment on climate action plan
Date: Tuesday, January 30, 2024 5:47:16 PM

From: Elliot Helman <muzungu_x@yahoo.com>
Sent: Tuesday, January 30, 2024 5:47:06 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: comment on climate action plan

You don't often get email from muzungu_x@yahoo.com. [Learn why this is important](#)

thanks for your work on protecting our environment. while the plan is a good start, i encourage you to go further. for example:

- 3,200-foot setback from drilling sites is on the *lower* end of the range of distances that could reduce the harmful health—and quality of life—impacts from toxic emissions and exposures.
- we need a requirement for regular, periodic monitoring of methane and other dangerous emissions at existing oil and gas infrastructure.

while i do not live in contra costa county, this is a concern for me because ultimately, we all drink the same water & breathe the same air.

thanks.

elliott helman
san francisco 94158

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Comments on Contra Costa County Climate Action Plan
Date: Tuesday, January 30, 2024 5:49:09 PM

From: Carl Mills <hwayhouse@gmail.com>
Sent: Tuesday, January 30, 2024 5:48:49 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Comments on Contra Costa County Climate Action Plan

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Please prohibit development of new oil and gas wells and phase out existing oil and gas operations. I encourage the County to implement the Climate Action Plan described at [Draft Contra Costa County Climate Action Plan 2024 Update | Contra Costa County \(konveio.com\)](#)

Carl Mills

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Comments on Contra Costa County's Climate Action Plan
Date: Tuesday, January 30, 2024 5:50:32 PM

From: Dennis O <the_dent2001@yahoo.com>
Sent: Tuesday, January 30, 2024 5:50:19 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Comments on Contra Costa County's Climate Action Plan

You don't often get email from the_dent2001@yahoo.com. [Learn why this is important](#)

Hi,

I support your work on the ordinance calling for a drilling ban and phase out. Thank you very much.

Please build on the good work by preventing any approvals from going forward while the new ordinance is developed.

Another change that I would like to see is an increase in the setback distance since the latest research indicates that 3,200 feet is on the lower end of the safe distance range.

Finally, all the rules in the world won't make a difference if there is no monitoring and enforcement. Please add a requirement for independent monitoring of methane and other dangerous emissions on a regular basis at existing oil and gas sites paid for by the site operators.

Thanks,
Dennis

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: comment on Contra Costa County Climate Action Plan
Date: Tuesday, January 30, 2024 5:49:16 PM

From: Susan Sepanik <ssepanik@gmail.com>
Sent: Tuesday, January 30, 2024 5:48:55 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: comment on Contra Costa County Climate Action Plan

You don't often get email from ssepanik@gmail.com. [Learn why this is important](#)

Hello,

I would like to put a comment in about the Contra Costa County Climate Action Plan. I much appreciate the effort to undertake a “feasibility study” and to create a new land use ordinance to prohibit development of new oil and gas wells and phase out existing oil and gas well operations. Thank you for this effort to ban drilling. I would love to see a moratorium to prevent future permits. I also appreciate the work toward better safety regulations and think moving in this direction is very important.

Thank you for your consideration,

Susan Sepanik
Oakland, CA

January 30, 2024

email@envisioncontracosta2040.org

Contra Costa County
Conservation & Development
30 Muir Road
Martinez, CA 94553

Re: Comments on Draft Envision 2040 – General Plan

To Whom Concerned:

Thank you for this opportunity to provide comments on the Draft Envision 2040 – General Plan (“draft General Plan”). The draft General Plan was user friendly and very comprehensive. County staff did a great job!

Our firm has represented and currently represents owners and developers throughout the County. We have the following concerns about the draft General Plan.

1. Development on Slopes Exceeding 25%.

We are questioning the need and reasoning in changing the requirement for development on certain slopes. The current General Plan and Measure C (1988 and 1990) state that major slope areas in excess of 26% *may* be unsuitable for development. The draft General Plan is proposing to change this policy and *prohibit* development on slope exceeding 25%. (See, HS-P11.5, p. 9-50.)

Measure C – 1990 states in Section 4. B. 6:

Hillside Protection. Development on open hillsides and significant ridgelines throughout the County shall be restricted, and hillsides with a grade of 26% or greater, shall be protected through implementing zoning measures and other appropriate actions.

Similar language is found in Measure C – 1990, Section 4.B.3 relating to the Urban Limit Line.

Both the 1988 and 1990 Measure Cs were a major force in creating the guidance in the current General Plan. As stated on page 1-2 of the current General Plan, “[t]he policies and principles expressed by the voters in Measure C - 1988 and Measure C - 1990 have guided the evolution of most of the elements of this General Plan.” The General Plan continues in

Contra Costa County
Conservation & Development
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Page 2

acknowledging that “[t]hrough this initiative measure, the voters affirmed key policies concerning open space and agricultural preservation, creation of an Urban Limit Line, protection of open hillsides and significant ridge lines, growth management, affordable housing and other issues which the County had been preparing to adopt as part of its General Plan.”

So, why is the draft General Plan changing this fundamental base that was approved by the voters on two separate occasions?

Moreover, the draft General Plan, with the proposed more restrictive standard, will prevent some housing development from occurring that could occur under the current General Plan. This is inconsistent with the mandate we have been provided by our Legislature to create more housing.

We also question if the County can propose a policy that will reduce development as we believe its inconsistent with SB 330. Specifically, Government Code §66300(b)(1)(A) precludes the County from enacting a development policy that would have the effect of changing a land use designation or the zoning to a less intensive use than was allowed on January 1, 2018. This section of SB 330 comes from the new Housing Crisis Act of 2019, which was enacted to accelerate housing production and remove barriers and impediments to building much needed housing.

2. Development on Slopes Exceeding 15%.

Second, we have the same points to offer on the proposed language in the same policy discussed above that would “[d]iscourage development on slopes exceeding 15%”. (See, HS-P11.5, p. 9-50.) The current General Plan states that “[g]enerally, residential density shall decrease as slope increases, especially above a 15 percent slope.” (See, Safety Element, Policy 10-28. p. 10-26). The new proposed language seems more restrictive than what currently exists, and we believe the change is not necessary or permitted by SB 330.

The draft General Plan should not contain language that limits housing especially in areas that were once allowed to provide housing. Rather, it should include language to promote housing as mandated by the Legislature to address our housing crisis.

3. Application of the Changes in the draft General Plan.

We assume the more restrictive changes in the draft General Plan, if and when adopted, will not be applied to development applications currently being processed and deemed complete by the Community Development Department. Can you please confirm our assumption.

Contra Costa County
Conservation & Development
January 30, 2024
Page 3

Thank you for this opportunity to comment.

Very truly yours,

FENNEMORE WENDEL

A handwritten signature in blue ink, appearing to read 'P. E. Curtin', is written over the printed name.

Patricia E. Curtin

From: Email Request
Sent: Tuesday, January 30, 2024 5:51 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Some comments on Contra Costa County Climate Action Plan

From: pavle cajic <cajicpaja@gmail.com>
Sent: Tuesday, January 30, 2024 5:50:31 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Some comments on Contra Costa County Climate Action Plan

You don't often get email from cajicpaja@gmail.com. [Learn why this is important](#)

To the staff at Contra Costa County,

Hello, my name is Pavle, I am a resident of San Francisco. I recently reviewed the draft versions of Contra Costa County's Climate Action Plan and 2045 General Plan, and I appreciate the opportunity for community input.

Firstly, thank you for the commitment to the proposed ordinance calling for a drilling ban and phase-out.

To protect communities adjacent to the oil fields during the development of this plan, you must implement a moratorium on permit approvals until the new policy is thoroughly developed and implemented.

I would also like to see regular monitoring of methane and other dangerous emissions at existing oil and gas infrastructure. This is crucial for ensuring the ongoing safety and environmental impact of such facilities.

I'll be submitting these comments through the provided platform, but I wanted to email you directly about them as well. Thank you for your dedication to creating sustainable and safe policies for our community.

Best regards,
Pavle Cajic

Sent from [Mail](#) for Windows

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Comment on CCC Climate Action Plan
Date: Tuesday, January 30, 2024 5:48:42 PM

From: Ellen Beans <ellen.beans@gmail.com>
Sent: Tuesday, January 30, 2024 5:48:22 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: re: Comment on CCC Climate Action Plan

You don't often get email from ellen.beans@gmail.com. [Learn why this is important](#)

Thanks for all you have put in this plan for the better health and safety of everyone. How about putting out a moratorium on any further permit approvals until the new ordinance is completed?

Ellen Beans, Moraga

Ellen Beans
925-376-7306

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Comment on Contra Costa's new Drilling Policy
Date: Tuesday, February 6, 2024 7:47:27 PM

From: Adam Joselson <ajoselson@gmail.com>
Sent: Tuesday, February 6, 2024 7:47:09 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Comment on Contra Costa's new Drilling Policy

You don't often get email from ajoselson@gmail.com. [Learn why this is important](#)

Dear Staff,

Thank you for your commitment to this ordinance calling for a drilling ban and phase out. We want to see a moratorium in place to prevent any more permit approvals while the new ordinance is developed. Communities adjacent to Contra Costa oil fields must be fully protected while new policy is worked up.

There's an implicit acknowledgement of the health and safety dangers of oil and gas drilling with the inclusion of 3,200' setbacks, but we would like to see even stronger protection in place. Current research shows that a 3,200-foot setback from drilling sites is on the lower end of the range of distances that could reduce the harmful health impacts. The most health-protective approach is actually no drilling at all.

Current oil and gas production in the County is woefully under-monitored by state and local air regulators, leaving Contra Costa residents at risk. Please add a requirement for regular, periodic monitoring of methane and other dangerous emissions at existing oil and gas infrastructure.

Thank you,
Adam J

From: Email Request
Sent: Monday, February 12, 2024 4:33 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: County Environmental Plan

From: Marcia L. <marcia2799@hotmail.com>
Sent: Monday, February 12, 2024 4:32:50 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: County Environmental Plan

You don't often get email from marcia2799@hotmail.com. [Learn why this is important](#)

Greenhouse gases are very under monitored as described in the county's plan . Please change that!!!

Marcia Liberson,

Walnut Creek
94595

From: Email Request
Sent: Monday, February 12, 2024 12:28 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: requesting addition to CCCClimate Action Plan

From: Elizabeth Chosak <mschosak@comcast.net>
Sent: Monday, February 12, 2024 12:27:46 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request
Subject: requesting addition to CCCClimate Action Plan

[You don't often get email from mschosak@comcast.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Please add a requirement that regular and periodic monitoring be required at all existing oil and gas structures of methane and other polluting gases to the current CCC Climate Action Plan.

Thank you.

Elizabeth Chosak
4243 Terra Granada Drive #1B
Walnut Creek, CA
94595

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Monitoring of emissions
Date: Monday, February 12, 2024 6:39:46 PM

From: Linda Ostro <lostro@pacbell.net>
Sent: Monday, February 12, 2024 6:39:32 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: RE: Monitoring of emissions

You don't often get email from lostro@pacbell.net. [Learn why this is important](#)

Oil and gas production in the Contra Costa County is woefully under monitored by state and local air regulators, which leaves CC County residents at great risk of serious health effects and reduced longevity.

Please add a requirement for regular, periodic monitoring of methane and other dangerous emissions at existing oil and gas infrastructure. I am worried about all citizens but especially the lungs of our children that are not yet fully developed and people with existing health conditions that put them at great risk for serious illness.

Thank you!

Linda Ostro

A very concerned grandmother



Robert Brown

Senior Director, Bay Area & CA Regional Affairs

Mr. Will Nelson and Ms. Jody London sent via email

Advance Planning – Contra Costa County
30 Muir Road
Martinez, CA 94553

Re: WSPA Comments on the 2045 Contra Costa General Plan and Climate Action Plan

The Western States Petroleum Association (WSPA) is a non-profit trade association representing companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas, renewable diesel and other energy supplies in California, Arizona, Nevada, Oregon, and Washington. Our members in the Bay Area have four facilities that operate in Contra Costa County.

We appreciate County staff keeping us informed – including a recent meeting in December where you shared the highlights of the draft Contra Costa County 2045 General Plan and Climate Action Plan (the Plans). Given the scope and economic impact of our operations, we are keenly interested in the direction of this plan as it moves through the approval process this year.

California is the third largest gasoline consuming market on the planet, behind China and the United States. California is also the largest consumer of jet fuel among the 50 states. Two refineries located in the County provide virtually all the jet fuel for our region's airports. The average annual wage of an oil and gas worker is more than \$80,000 and nearly 50% of oil and gas workers are racially and ethnically diverse. The last available data (pre-2020) shows that the Bay Area manages about 44% of the refining capacity in the state; creates more than \$3.4 billion in state and local tax revenue; more than \$50 billion in overall economic contribution; and supports more than 80,000 jobs in the region. (*LAEDC 2019 Report Oil & Gas in CA*)

While WSPA recognizes that the Plans do not directly propose policies ordering refineries in the County to cease operation, in many places throughout the proposals there is reference to transition away from the use of energy dense fossil fuels. Given this, we question how the Plans account for the ongoing maintenance and upkeep of refinery facilities while signaling to investors and energy providers that they are not part of the vision? The Plans assume a non-operational status but do not recognize the facilities still being productive.

Given the state and Bay Area population's reliance on a safe, reliable, sustainable, and affordable energy source that the County's refineries provide, the Plans should acknowledge a future in which these facilities do still exist – albeit with a diverse fuel mix. The policies throughout the Plans which focus on transportation, environmental justice, and land use would directly impact the products our industry produces and the market demands. The Plans' assumptions limit innovation that could deliver a diverse fuel mix to all socio-economic sectors.

WSPA welcomes the references to “partnering with educational institutions and programs, unions and trade associations to support job-skills training and recruitment from the local workforce.” We also appreciate “enhancing Contra Costa County's success as an economic hub depends on retaining, supporting, and attracting a diverse range of businesses that will sustain the local economy despite changing market forces.”

We would like to know when the County will provide a socio-economic analysis of the policies laid out in the General Plan. Has the Department of Conservation Development conducted an economic analysis on what is being proposed? It is critical to understand the real impacts the Plans will have on members of lower income communities who cannot afford an electric car, or cannot retrofit their homes/rental units for charging or electric appliance upgrades. Further, the terms “transition” and “just transition” are referenced throughout the Plans. We request specific examples of industries that could replace the fossil fuel industry at scale, especially as it relates to the size of the workforce, career salary expectations, tax revenue, and necessary consumer products and services.

In addition, we would like to better understand how the Climate Action Plan will be enforced. This may require a better explanation of the correlation between the General Plan and the Climate Action Plan. For example, what authority does the Climate Action Plan have? Are the Plans recommending any changes as it relates to the zoning of refineries in the County? Will the Plans make it harder for refineries to invest in their facilities?

Our industry in this region is among the most regulated in the world. Nobody refines the fuel cleaner and safer than the Bay Area and California. Our energy landscape is evolving and incorporating the ingenuity and innovation with renewable diesel and other alternative energy to complement traditional fossil fuels which will be in demand for generations to come. From the regulatory side, our industry has more than 30 entities at the state, local, regional, and federal level that regulate our operations. Compliance with those ever-changing and complex laws, rules and regulations is of paramount importance with our thousands of employees, contractors, and skilled trade workers in the region. Better understanding the enforcement and compliance implications of these Plans is critical.

Finally, the draft General Plan directly calls out petroleum refining and other industries as “highly polluting” in several locations. In reality, in comparison to tail pipe emissions, wildfire emissions and other sources, refineries are a smaller fraction of total emissions output. WSPA welcomes the opportunity to work with the County on language that is more reflective of that reality.

Will Nelson/Jody London
February 12, 2024
Page 3

Thank you for considering our comments. We look forward to continuing the dialogue with you both to address our questions and concerns. If you have any questions, I can be reached at 925-708-8679 or bbrown@wspa.org.

Respectfully,

A handwritten signature in black ink, appearing to read "BBrown", with a long horizontal flourish extending to the right.

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Comment on General Plan draft update
Date: Friday, February 16, 2024 8:43:14 PM
Attachments: [image.png](#)
[image.png](#)

From: Kevin Burke <kevin@burke.dev>
Sent: Friday, February 16, 2024 8:42:29 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Comment on General Plan draft update

You don't often get email from kevin@burke.dev. [Learn why this is important](#)

I am encouraged by the proposed rezoning of a vacant 1.5 acre parcel near Livorna Road and 680 for RM level density.

This site presents more than a few challenges, however - it has a pretty steep grade which may prevent utilizing the entire site. The [real estate materials](#) for the site are marketing it to buyers who want to build only one house, instead of 20. Also, the current access is a road between a preschool's classrooms and its playground; access from Livorna Road would require substantial amount of grading. There are few valid grounds to deny a project on health and safety grounds under the Housing Accountability Act, but "large number of cars through a preschool" may be one of them.

Still, for all its shortcomings, this site is still way better, on equity grounds, than the County's far more aggressive rezonings of single family areas in locations that have more pollution, are located further from job centers, and have worse schools. I just wish this wasn't the only site in Alamo the County was considering for additional density. For example, there are quite a few large single family lots on flat ground, within walking distance of Alamo Plaza and the Iron Horse Trail that can easily accommodate additional car-light density.

image.png

Or this large vacant parcel on Stone Valley Road where you would not need to drive through a preschool or do a substantial amount of grading to access the site.

image.png



Best,

Kevin Burke

From: [Tanya Sundberg](#)
To: [Lauren Willey](#)
Subject: FW: Question about 2045 General Plan
Date: Friday, July 19, 2024 12:41:33 PM

TANYA SUNDBERG

Principal

she/her

510.848.3815 ext. 3390 | cell: 510.866.8336

From: Soheila Bana <soheilabana@gmail.com>
Sent: Saturday, February 17, 2024 10:03 AM
To: Will Nelson <Will.Nelson@dcd.cccounty.us>
Cc: Tom Lang <tlangesmac.cc@gmail.com>; George Cleveland <gdc82366@yahoo.com>; Mikki Norris <mikkinorris@comcast.net>; Melinda V McLain <melinda@the-good-table.org>; Shasa Curl <Shasa_Curl@ci.richmond.ca.us>; Soheila Bana <Soheila_Bana@ci.richmond.ca.us>; Sue Boudreau <sueboudreau2004@yahoo.com>
Subject: Re: Question about 2045 General Plan

This email originated from outside of the City's email system. Do not open links or attachments from untrusted sources.

Hi Will,

Thank you for your email. My goal in advocating for comprehensive maps is to foster collaboration between the City and County in El Sobrante Valley. Effective planning for amenities like bike paths requires coordination across all jurisdictions involved, as routes often traverse both City and unincorporated areas. As a Richmond City Councilmember, I've requested our City Manager, who is cc'd here, to depict unincorporated areas on our city maps, possibly with hachures or distinct colors, to fully represent our shared landscape.

Would you consider this inclusive mapping approach as a foundational step towards strengthening cooperation between the City of Richmond and the County? This could significantly enhance safety and quality of life for all residents in the El Sobrante Valley, including those in unincorporated zones.

Regards,
Soheila Bana

Chair, West Contra Costa Fire Safe Council

(510) 779-7280

WCCFireSafe.org



From: Denice A Dennis <deniceadennismph@gmail.com>

Sent: Monday, February 26, 2024 10:06 AM

To: Luz Gomez <luzgomez000@gmail.com>; DCD Sustainability <Sustainability@dcd.cccounty.us>; Jody London <Jody.London@dcd.cccounty.us>

Subject: Public Comment on Item #6 on 2/26/24 Commission Agenda.

To: Luz Gomez, Chair, Contra Costa Sustainability Commission and all Commission Members

A sincere thank you to each of the Commissioners for the service you are providing to the residents and workers of the County. One of the three “responsibilities” of the Commission is to “Provide Advice to staff and the Board on successful implementation of the Climate Action Plan, including suggestions on how that work can be performed more efficiently and effectively”. This work contributes to the health and safety of people throughout the region.

There are several “high level” concerns with the current draft of the County’s Climate Action Plan related to your mission. This letter focuses on a few of these concerns.

1) Various Implementation and Performance Targets are contained in three separate sections of the document. In order to convey all implementation activities and performance targets, we strongly recommend that **Chapter 4 and Chapter 5 Strategies, Chapter 6 2024 CAP Implementation**

Matrix, and Appendix B Key Assumptions and Performance Targets Sections, are all (minimally) cross-referenced. This would convey the fuller picture of the plan’s strategies, what actually needs to be accomplished to reduce the stated greenhouse gas emissions, and how success will be measured, for all of the community, including residents, staff, Commissioners and the Board of Supervisors.

As currently presented, the GHG Reduction Strategies described in Chapters 4 and 5 of the plan are also listed in a completely separate document, Chapter 6, 2024 CAP IMPLEMENTATION MATRIX, which includes additional information. Actual “Key Assumptions” and “Performance Measures” required to achieve the projected GHG emissions reductions assumed for each strategy are embedded in yet another section of the document within Appendix B, beginning on page 244 of the PDF.

According to the narrative contained in Appendix B, the Appendix includes the **“Key Assumptions made about the strategy’s performance, such as the level of community participation required to achieve the specified reductions by 2030 and 2045”**. It also contains the “Performance Targets, which are quantifiable metrics about the projected level of success the strategy must meet to achieve the specified reductions by 2030 and 2045”. *Both the Key Assumptions and Performance Targets are absolutely necessary in evaluating the success of each GHG reduction strategy listed.* Yet they are contained in an Appendix, and are separated from the “Key Performance Metrics” in the Implementation Plan.

2. The 2024 CAP and Carbon Neutrality Section of the CAP (page 104 of Plan/page 122 PDF) contains other areas of concern:

- a) The stated possible inability to reach GHG reduction targets in line with the state by 2045 with tools available now. We are in an urgent situation—The County needs to prioritize what we can do to move aggressively on GHG emissions reductions in buildings, waste and transportation and just transition in order to close the gap in the plan. The science shows that have what is needed to do so--we can not rely on hoped-for technological fixes.
- b) Reliance on “uncertain” carbon sequestration for results. Referenced in the section on The CAP and Carbon Neutrality (p104) are uncertainties around carbon sequestration, storage and carbon offsets as means to reach reduction goals. Industrial carbon capture and storage should not be considered as a possible future solution for GHG reduction in the County. It is expensive, and is unproven in its ability to actually reduce emissions.
- c) Using offsets is another false approach that only consigns our impacted communities to continued pollution based upon offsets that often cannot be proven to be truly a new reduction in carbon. The plan needs to prioritize direct GHG emission reductions that also improves air quality for the areas of the county with the worst cumulative air pollution.

Toward a healthy and safe future for our children and grandchildren,

Denice A. Dennis, MPH
1000 Grandmothers for Future Generations

From: Email Request
Sent: Tuesday, February 27, 2024 12:14 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: County Drilling Policy - Thanks and keep up the good work!

From: susanrharper@comcast.net <susanrharper@comcast.net>
Sent: Tuesday, February 27, 2024 12:13:42 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: County Drilling Policy - Thanks and keep up the good work!

You don't often get email from susanrharper@comcast.net. [Learn why this is important](#)

Thank you for your commitment to the drilling ordinance...I and many would like to see a moratorium in place so there will be no more permit approvals as the new ordinance is developed. It is imperative that communities adjacent to the oil fields in Contra Costa County be fully protected while the new policy is set up.

I am especially pleased that the common sense requirement of 3200 ft setbacks, however as we know 3200 ft is on the lower end of the range from harmful health threats, quality of life, and impacts from toxic emissions and exposures. A 2021 [Stanford study](#) found negative health impacts within a 2.5 mile radius from oil and gas facilities. The state health panel which declared 3,200' setbacks the minimum protective distance also found that **the most health-protective approach is actually no drilling at all. Let's *fully* protect Contra Costa residents, and our climate.**

We need better monitoring of oil and gas production in the county and regular, periodic monitoring of existing oil and gas infrastructure of methane and other dangerous emissions should be required.

Thanks in advance for your help in protecting me, you and our fellow citizens...isn't that what we should expect?
Susan Harper

From: Email Request
Sent: Tuesday, February 27, 2024 1:16 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Drilling Policy in Contra Costa's General Plan

From: Jane P Perry <jpperry@berkeley.edu>
Sent: Tuesday, February 27, 2024 1:15:37 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Drilling Policy in Contra Costa's General Plan

You don't often get email from jpperry@berkeley.edu. [Learn why this is important](#)

Dear Contra Costa County Board of Supervisors and Department of Conservation and Development Planning Staff,

I hope you and your loved ones are safe and healthy with everything you need.

I am a member of [1000 Grandmothers for Future Generations](#) and I thank you for committing to the inclusion of a drilling ordinance in your General Plan. To ensure the health and safety of all life in Contra Costa, I urge you to halt permit approvals while you bring up to speed your new drilling ordinance. I would also commend your commitment to a plan to end all drilling in the County, per [the 2021 Stanford study](#) detailing “air pollution exposure *within 2.5 miles of oil and gas wells, likely worsening negative health outcomes for nearby residents.*” Results from this study certainly ought to have you amend your 3,200-foot setback from drilling sites to the 2.5 miles during your transition away from drilling, to best protect residents.

I am also concerned about viable safety monitoring. I know from volunteering in the Iron Triangle in Richmond that it is neighbors in the sacrifice zone that are monitoring refinery toxins, which is outrageous but necessary and speaks to the necessity of a proper accountability plan for methane and other toxic emissions while you free Contra Costa from harmful drilling.

Thank you for coordinating with other counties as we all work together to assure a safe and healthy future for all life.

Take good care and please stay safe.

Jane Perry

Jane P. Perry, Ph.D.

Retired Teacher & Researcher, UC Berkeley

Unceded Territory of Huchiun (5814 Margarido Dr., Oakland 94618)

Jane Putnam Perry, she/her, guest on Lisjan Territory (Oakland, CA), member of [1000 Grandmothers](#), writes and creates art with her cross-genre [White Snake Diary](#) (Atmosphere Press) and pieces in [McSweeney's Quarterly Concern](#), [The Oaklandside](#), [The Gloucester Times](#), [Paper Dragon](#), [Alluvian](#), [Still Point Arts Quarterly](#), [The Ravens Perch](#), [The Bluebird Word](#), [Glacial Hills Review](#), [The Mail/The New Yorker](#), and

several academic publications including *Outdoor Play* (Teachers College Press). Jane's "[Echo Bridge](#)" was a 2021 audio poetry finalist in *The Missouri Review* and her nonfiction "The Liminal Diary" was a 2023 finalist in the Phil Heldrich Nonfiction Contest at *Choeofpleirn Press*. janeperry.com

From: Email Request
Sent: Tuesday, February 27, 2024 10:45 AM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: New Land Use Policy

From: Jane Courant <janecourant@gmail.com>
Sent: Tuesday, February 27, 2024 10:44:27 AM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: New Land Use Policy

You don't often get email from janecourant@gmail.com. [Learn why this is important](#)

Dear friends,

Thank you very much to your commitment to Contra Costa's commitment to a new drilling ordinance. In addition, I support a moratorium to prevent any more permit approvals until the ordinance is finalized. Communities near oil fields must be protected during this time.

The requirement for 3200 foot setbacks good, but we'd like to stronger protection in place, including a complete ban on drilling. Staff needs to understand that research shows that a 3,200-foot setback from drilling sites is on the *lower* end of the range of distances to reduce health harms from toxic emissions and exposures. A 2021 [Stanford study](#) found negative health impacts within a much higher 2.5 mile radius from oil and gas facilities. The state's 3200 foot setback rule is the minimum distance protecting people from most health harms and the most protective approach is to not drill at all. I urge you to protect Contra Costa residents and the overall climate.

Further, Contra Costa County is extremely under-monitored by state and local air regulators, leaving county residents at risk so staff must require regular, periodic monitoring of all county oil and gas infrastructure of methane and other dangerous emissions.

Sincerely yours,

Jane Courant

Richmond

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Comment on New County Drilling Policy
Date: Tuesday, February 27, 2024 10:47:59 AM

From: CJ Koepp <courtcoepp@gmail.com>
Sent: Tuesday, February 27, 2024 10:47:38 AM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Comment on New County Drilling Policy

You don't often get email from courtcoepp@gmail.com. [Learn why this is important](#)

Hello,

My name is CJ Koepp and I'd like to submit a comment on the new Contra Costa County drilling policy.

First off, I appreciate your commitment to a new land use ordinance prohibiting the development of new oil & gas wells, and phasing out existing operations. Now more than ever we need to stop expanding toxic fossil fuel extraction operations, and this is a great step forward.

I would also like to see a moratorium in place preventing any more permit approvals while the new ordinance is developed. It could take months (even years) before the ordinance is approved, and people living near oil fields deserve freedom from pollution now.

Secondly, the 3200' setbacks are fantastic, but it's at the lower end of distances that could limit the toxic impacts from fossil fuel pollution. The best protection for people living near fossil fuel extraction operations would be no drilling at all.

Finally, fossil fuel production in the County is severely under-regulated, leaving Contra Costa residents at the mercy of corporations who don't care if they're poisoning our communities. It's important for state & local air regulators to regularly periodically monitor existing infrastructure & emissions.

I appreciate the work you're doing and hope you have a great day!

Thanks,
CJ

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Comments on county drilling policy
Date: Tuesday, February 27, 2024 10:09:59 AM

From: Karen Beck <karenbeck730@gmail.com>
Sent: Tuesday, February 27, 2024 10:09:39 AM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Comments on county drilling policy

You don't often get email from karenbeck730@gmail.com. [Learn why this is important](#)

Dear Staff

Thank you for committing to create a new land use ordinance to prohibit development of new wells and phase out old ones.

Please also place a requirement higher than 3200 foot setbacks . Stanford studies show a 2.5 mile radius positively impacts health and quality of life issues. Ofcourse we really desire no drilling at all.

Also oil and gas production is seriously under monitored by state and local authorities. Please require regular monitoring of oil and gas infrastructure especially for dangerous emissions.

Thank you for your work but clearly there is more to do to protect the climate and health issues in general.

Sincerely

Karen and Stephen Beck
Danville, Ca

From: Email Request
Sent: Wednesday, February 28, 2024 8:53 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: no new oil and gas drilling in Contra Costa

From: Jean Tepperman <jeantepper@gmail.com>
Sent: Wednesday, February 28, 2024 8:52:49 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: no new oil and gas drilling in Contra Costa

You don't often get email from jeantepper@gmail.com. [Learn why this is important](#)

Dear Contra Costa County Board of Supervisors and Department of Conservation and Development Planning Staff,

Thank you so much for your concern about the dangers of oil and gas drilling. The 3200- ft. setback between drilling and sensitive receptors is really important, although that distance is not enough to really protect health and safety, as explained in this [Stanford University research report](#).

I especially grateful for your commitment to seek a county ordinance banning future new drilling permits and phasing out existing drilling. But I am concerned that new drilling could start in the time it takes to get an ordinance passed.

So I am really hoping that you will immediately put in place a moratorium on new drilling permits until the process has time to be completed.

Thank you,
Jean Tepperman
East Bay resident

From: Email Request
Sent: Wednesday, February 28, 2024 8:12 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: No new oil and gas drilling

From: Ellen Beans <ellen.beans@gmail.com>
Sent: Wednesday, February 28, 2024 8:12:06 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: No new oil and gas drilling

You don't often get email from ellen.beans@gmail.com. [Learn why this is important](#)

I am writing to thank you for **committing to create a new land use ordinance to prohibit development of new oil and gas wells and phase out existing operations in our county. Until that process is complete, I recommend and urge you create a MORITORIUM to prevent any more permit approvals while the new ordinance is developed.**

I am happy to see a requirement for 3,200' setbacks, though I had hoped for a much stronger protection requirement.

Because I know that current oil and gas production in our county is definitely not monitored adequately by state and local air regulators, leaving us residents at risk, I urge your staff to **REQUIRE REGULAR, PERIODIC MONITORING** of existing oil and gas infrastructure of methane and other dangerous emissions.

Thanks for what you have done so far, but there is more I urge you to include in these efforts to protect the people of this county for the years to come.

Sincerely,
Ellen

Ellen Beans
925-376-7306

under the California Public Records Act.

From: Aaron Trott <atrott@eccid.org>
Sent: Wednesday, February 28, 2024 11:15 AM
To: Will Nelson <Will.Nelson@dcd.cccounty.us>
Cc: DCD Advance Planning <AdvancePlanning@dcd.cccounty.us>
Subject: Response to Draft EIR for CCC General plan.

Hello Will,

After a brief review of the 2045 General Plan, I have a couple of observations that may require correction. The Land use map on page 7 identifies a portion of the East Contra Costa Irrigation District fee property as RC (Resource Conservation). The parcels below should be identified as AL (Agricultural Lands) or AC (Agricultural Core). The District has not identified these lands as RC. They are currently part of the working irrigation system which require ongoing maintenance to maintain proper operations. Please respond once you have researched the parcel below as well as the parcels associated with the attached grant deed documents.

011-270-006-7

Thanks for your help Will.

Aaron Trott, General Manager
East Contra Costa Irrigation District
1711 Sellers Avenue, Brentwood, CA 94513
Phone (925) 634-3544 Fax (925) 634-0897

This electronic message contains information from East Contra Costa Irrigation District, which is confidential or privileged. The information is intended to be sent to the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying or distribution or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify us by telephone at 925-634-3544.

Portion of APN's 004-510-003, 004 & 005,
004-010-006, 008 & 009
011-230-050 & 051
RECORDED AT THE REQUEST OF:
and
WHEN RECORDED RETURN TO:

East Contra Costa Irrigation District
1711 Sellers Avenue
Brentwood, CA 94513



Electronically Recorded
CONTRA COSTA Co Recorder Office
KRISTIN B. CONNELLY, Clerk-Recorder
DOC - 2024-0012197
Wednesday, Feb 7, 2024 15:35:00



Total Paid: No Fee Receipt #: 202400012242
19 - eRecording Partners Network LLC 207 / ARPC / 1-16

GRANT DEED

The undersigned grantor(s) declare(s):

Documentary Transfer Tax: _____ R&T Code 11922-Governmental agency acquiring title

- computed on full value of property conveyed
- computed on full value less value of encumbrances
- unincorporated area, and
- realty not sold

FOR VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,

Pulte Home Company, LLC, a Michigan limited liability company


hereby **GRANTS** to East Contra Costa Irrigation District, a public entity

that property in the unincorporated area, County of Contra Costa, State of California, described as follows:

SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF.

Dated : JULY 13, 2023

Pulte Home Company, LLC, a Michigan limited liability company


By: Aaron Head Aaron Head
Title: VP Land Planning & Development

Mail tax statements to grantee at above address.

This instrument is filed for record by Old Republic Title as an accommodation only and no title insurance has been purchased. It has not been examined as its effect, if any, upon the title of the land described.

Portion of APN's 004-510-003, 004 & 005,
004-010-006, 008 & 009
011-230-050 & 051

RECORDED AT THE REQUEST OF:
and
WHEN RECORDED RETURN TO:

East Contra Costa Irrigation District
1711 Sellers Avenue
Brentwood, CA 94513

GRANT DEED

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- () computed on full value of property conveyed
- () computed on full value less value of encumbrances
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 By: Aaron Head Aaron Head
 Title: VP Land Planning & Development

Mail tax statements to grantee at above address.

This instrument is filed for record by Old Republic Title as an accommodation only and no title insurance has been purchased. It has not been examined as its effect, if any, upon the title of the land described.

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of Alameda)

On July 13, 2023 before me, Dee S. Bumanlag, Notary Public
(insert name and title of the officer)

personally appeared Aaron Head,
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are
subscribed to the within instrument and acknowledged to me that he/she/they executed the same in
his/her/their authorized capacity(ies); and that by his/her/their signature(s) on the instrument the
person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing
paragraph is true and correct.

WITNESS my hand and official seal.

Signature  (Seal)

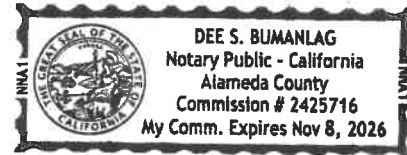
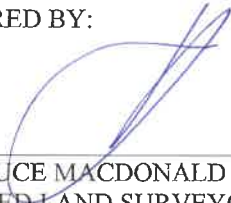


EXHIBIT "A"
DESCRIPTION

ALL THAT CERTAIN REAL PROPERTY SITUATED IN THE UNINCORPORATED TERRITORY OF CONTRA COSTA COUNTY, STATE OF CALIFORNIA, BEING ALL OF PARCELS I AND J AS SHOWN ON SUBDIVISION 9591, FILED FOR RECORD IN BOOK 553 OF MAPS AT PAGES 39 THROUGH 49, CONTRA COSTA COUNTY RECORDS

END OF DESCRIPTION

PREPARED BY:



IAN BRUCE MACDONALD
LICENSED LAND SURVEYOR NO. 8817
STATE OF CALIFORNIA



6/9/23

DATE

MACKAY & SOMPS
CIVIL ENGINEERING • LAND PLANNING • LAND SURVEYING
5142 Franklin Drive Suite B, Pleasanton, CA. 94588-3355
(925) 225-0690

OWNER'S STATEMENT:

THE UNDERSIGNED, JOHN HENRY, CERTIFY THAT THEY ARE THE OWNER OF ALL THE LANDS DELINEATED AND EMBRACED WITHIN THE BOUNDARY LINES SHOWN ON THIS MAP AND THAT THE SAME ARE SUBJECT TO ALL RIGHTS OF RECORD TO WHICH THEY ARE ENTITLED BY LAW. THIS STATEMENT BEING ON SHEET ONE (1) THEREOF, THAT THEY HAVE CAUSED SAID MAP TO BE PREPARED FOR RECORD AND DO SO CONSENT TO THE MAKING AND RECORDING OF SAID MAP, THAT SAID MAP DOES ACCURATELY SET FORTH AND DESCRIBE ALL PARCELS OF LAND SO RESERVED FOR PUBLIC PURPOSES BY THEIR BOUNDARY, COORDINATES AND ELEVATION.

THE REAL PROPERTY DESCRIBED BELOW IS DEDICATED IN FEE TO CONTRA COSTA COUNTY FOR PUBLIC PURPOSES:

1. THE AREAS DESIGNATED AS "H" ARE HEREBY DEDICATED AS EASEMENT FOR PUBLIC PURPOSES:

THE REAL PROPERTY DESCRIBED BELOW IS DEDICATED AS EASEMENT FOR PUBLIC PURPOSES:

1. THE AREAS DESIGNATED AS PARCELS "A" THROUGH "G" AS SHOWN UPON SAID MAP ARE TO BE CONVEYED TO THE HOMEOWNERS ASSOCIATION BY SEPARATE DOCUMENT SUBSEQUENT TO THE FILING OF THIS MAP.

2. THE AREAS DESIGNATED AS PARCELS "H" THROUGH "O" AS SHOWN UPON SAID MAP ARE TO BE CONVEYED TO THE HOMEOWNERS ASSOCIATION BY SEPARATE DOCUMENT SUBSEQUENT TO THE FILING OF THIS MAP.

THE AREA DESIGNATED AS PARCEL "P" IS HEREBY RESERVED FOR DEDICATION TO RECLAMATION DISTRICT 600 BY SEPARATE DOCUMENT SUBSEQUENT TO THE FILING OF THIS MAP.

THE AREA DESIGNATED AS PARCELS "Q" AND "R" ARE HEREBY RESERVED FOR DEDICATION TO RECLAMATION DISTRICT 600 BY SEPARATE DOCUMENT SUBSEQUENT TO THE FILING OF THIS MAP.

THE AREAS DESIGNATED AS MAINTENANCE EASEMENT (ME) IS HEREBY RESERVED FOR DEDICATION TO RECLAMATION DISTRICT 600 BY SEPARATE DOCUMENT SUBSEQUENT TO THE FILING OF THIS MAP.

THIS MAP SHOWS OR NOTES ALL EASEMENTS, EXISTING OR OF RECORD, WITHIN THE BOUNDARY LINES OF THE HEREIN EMBODIED MAP.

IN WITNESS WHEREOF, THE UNDERSIGNED HAVE EXECUTED THIS STATEMENT ON THE 20th DAY OF

AS OWNERS: PULTE HOME COMPANIES, LLC, A MICHIGAN LIMITED LIABILITY COMPANY

BY: *[Signature]*

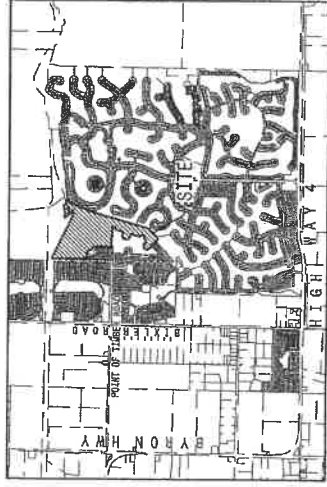
NAME: MARCO HEBD

TITLE: VP, LAND PLANNING & DEVELOPMENT

SUBDIVISION 9591

A SUBDIVISION OF PARCELS 1-4, 7, AND 11, DOCUMENT NUMBER 2005-0070061, RESULTANT PARCEL 2, DOCUMENT NUMBER 2022-0042513 AND RESULTANT PARCEL B AND RESULTANT PARCEL C, DOCUMENT NUMBER 2022-0061914, CONTRA COSTA COUNTY RECORDS, DISCOVERY BAY, CONTRA COSTA COUNTY, CALIFORNIA

MACKEY & SOMPS
ENGINEERS PLANNERS ARCHITECTS
31429 FRANKLIN DR. SUITE B
FREMONT, CA 94538 (925)225-0590
MARCH 2023



OWNER'S ACKNOWLEDGMENT:

A NOTARY PUBLIC OR OTHER OFFICER, COMPLETING THIS CERTIFICATE, HEREBY DECLARES ONLY THE CREDIBILITY OF THE INSTRUMENT WHO SIGNED THE DOCUMENT TO WHICH THIS CERTIFICATE IS ATTACHED, AND NOT THE TRUTHFULNESS, ACCURACY, OR VALIDITY OF THAT DOCUMENT.

STATE OF CALIFORNIA
COUNTY OF CONTRA COSTA

ON MARCH 20 2023, BY ME DEE S. BURNING A NOTARY PUBLIC, PERSONALLY KNOWN TO ME, WHOSE COMMISSION EXPIRES ON APRIL 10 2024.

WHO PROVED TO ME ON THE BASIS OF SATISFACTORY EVIDENCE TO BE THE PERSON WHOSE NAME IS BEING SUBSCRIBED TO THE WITHIN INSTRUMENT AND ACKNOWLEDGED TO ME THAT HE/SHE/IT/WEY EXECUTED THE SAME IN HIS/HER/ITS/OUR AUTHORIZED CAPACITY, AND BY HIS/HER/OTHER SIGNATURE(S) ON THE INSTRUMENT THE PERSON(S) OR ENTITY UPON BEHALF OF WHICH THE PERSON(S) ACTED, EXECUTED THE INSTRUMENT.

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING PARAGRAPH IS TRUE AND CORRECT.

WITNESS MY HAND AND OFFICIAL SEAL

SIGNATURE: Dee S. Burning

PRINTED NAME, NOTARY PUBLIC IN AND FOR SAID COUNTY AND STATE: DEE S. BURNING

PRINCIPAL COUNTY OF BUSINESS: ALAMEDA

COMMISSION EXPIRES: APR. 10, 2024

COMMISSION # OF NOTARY: 2428716

SIGNATURE OMISSIONS:

PURSUANT TO SECTION 600 OF THE CALIFORNIA SUBDIVISION MAP ACT, THE SIGNATURES OF THE FOLLOWING PARTIES HAVE BEEN OMITTED:

- 1. RECLAMATION DISTRICT 600
 - a. BOOK 27, PAGE 266, CONTRA COSTA COUNTY RECORDS (LEWIS)
- 2. EAST CONTRA COSTA IRRIGATION DISTRICT
 - a. BOOK 474, PAGE 732, CONTRA COSTA COUNTY RECORDS

COUNTY RECORDERS STATEMENT:

FILED FOR THE DAY OF APRIL 2023 AT 11:54 AM IN BOOK 553 OF MAPS AT CONTRA COSTA COUNTY UNDER SERIES NO. 13-003500A AT THE REQUEST OF PLTE HOME COMPANIES, LLC A MICHIGAN LIMITED LIABILITY COMPANY IN THE OFFICE OF THE COUNTY RECORDER OF THE CONTRA COSTA COUNTY, STATE OF CALIFORNIA.

* Series #
13-003500A

STATE OF CALIFORNIA
COUNTY RECORDER AND FOR THE CONTRA COSTA COUNTY, STATE OF CALIFORNIA
BY: *[Signature]*
DEPUTY COUNTY RECORDER

18977.0100.PC

SHEET 1 OF 11

W14/23 11:54 AM BT 553
POS. 24-49
EXHIBIT A-1
Page 2 of 12

PLANNING COMMISSION'S STATEMENT:

I HEREBY STATE THAT THE PLANNING COMMISSION OF THE COUNTY OF CONTRA COSTA, STATE OF CALIFORNIA, HAS APPROVED THE TENTATIVE MAP OF THIS SUBDIVISION, UPON WHICH THIS MAP IS BASED.

ARIANA BHAT
DEPUTY DIRECTOR
DEPARTMENT OF CONSERVATION AND DEVELOPMENT
COMMUNITY DEVELOPMENT DIVISION

BY: *Ariana Bhat*
ARIANA BHAT
DATED: March 23, 2023

BUILDING INSPECTOR'S STATEMENT:

A GEOTECHNICAL INVESTIGATION REPORT, PREPARED BY ENGEO INCORPORATED, DATED FEBRUARY 7, 2023, APPROVED FEBRUARY 13, 2023, PROJECT NO. 4820/00/001, HAS BEEN RECEIVED AND APPROVED. THE REPORT IS ON FILE IN THE BUILDING INSPECTION DIVISION, CONTRA COSTA COUNTY.

JASON CHAYO
DEPUTY DIRECTOR
DEPARTMENT OF CONSERVATION AND DEVELOPMENT
BUILDING INSPECTION DIVISION

BY: *Jason Chayo*
JASON CHAYO
DATED: 3/29, 2023

COUNTY SURVEYOR'S STATEMENT:

THIS MAP WAS EXAMINED BY ME AND IS SUBSTANTIALLY THE SAME AS IT APPEARS ON THE VESTING TENTATIVE MAP, AND ANY APPROVED ALTERATIONS THEREOF. ALL PROVISIONS OF THE SUBDIVISION MAP ACT AND ANY LOCAL ORDINANCES THAT APPLY TO THIS MAP HAVE BEEN COMPLIED WITH AND I AM SATISFIED THAT THE SAME IS TECHNICALLY CORRECT.

BY: *Diana M. Sengco*
DIANA M. SENCO, L.S. 8817
INTERIM COUNTY SURVEYOR
DATED: April 10, 2023



SURVEYOR'S STATEMENT:

THIS SUBDIVISION MAP WAS PREPARED BY ME OR UNDER MY DIRECTION AND IS BASED UPON A FIELD SURVEY IN CONFORMANCE WITH THE REQUIREMENTS OF THE SUBDIVISION MAP ACT AND LOCAL ORDINANCES AT THE REQUEST OF THE CLIENT. I HEREBY STATE THAT THIS FINAL MAP SUBSTANTIALLY CONFORMS TO THE CHARACTER AND OCCUPY POSITIONS INDICATED HEREON OR WILL BE SET WITHIN TWENTY FOUR MONTHS FROM THE RECORDED DATE OF THIS FINAL MAP, AND THE COMPLETION OF IMPROVEMENTS, AND WILL BE SUFFICIENT TO ENABLE THE SUBDIVISION INTO PARCELS OF LAND CONTAINING 40,777 SQUARE FEET OR MORE.

BY: *Marisa L. McDonald*
MARISA L. MCDONALD
L.S. 8817
DATED: March 17th, 2023



CLERK OF THE BOARD OF SUPERVISORS' STATEMENT:

STATE OF CALIFORNIA
CONTRA COSTA COUNTY
I, MONICA NIÑO, CLERK OF THE BOARD OF SUPERVISORS OF CONTRA COSTA COUNTY, COUNTY OF CALIFORNIA, DO HEREBY CERTIFY THAT THE ABOVE AND FOREGOING MAP ENTITLED "SUBDIVISION 9591" WAS PRESENTED TO SAID BOARD OF SUPERVISORS, AS PROVIDED BY § 92, AT A REGULAR MEETING HELD ON THE 12th DAY OF April, 2023, AND THAT SAID BOARD OF SUPERVISORS DID THEREUPON BY RESOLUTION DULY PASSED AND ADOPTED AT SAID MEETING, APPROVE SAID MAP AND THE PROPOSED IMPROVEMENTS AND APPROVE THE PROVISIONS OF IMPROVEMENTS ON BEHALF OF THE PUBLIC ALL OF THE STREETS, ROADS, AVENUES OR EASEMENTS SHOWN THEREON AS DESIGNATED TO PUBLIC USE. I FURTHER CERTIFY THAT ALL TAX LIENS HAVE BEEN SATISFIED AND THAT ALL BONDS AS REQUIRED BY LAW TO BE FILED WITHIN THE WITHIN MAP HAVE BEEN APPROVED BY THE BOARD OF SUPERVISORS OF CONTRA COSTA COUNTY, AND IN MY OFFICE.

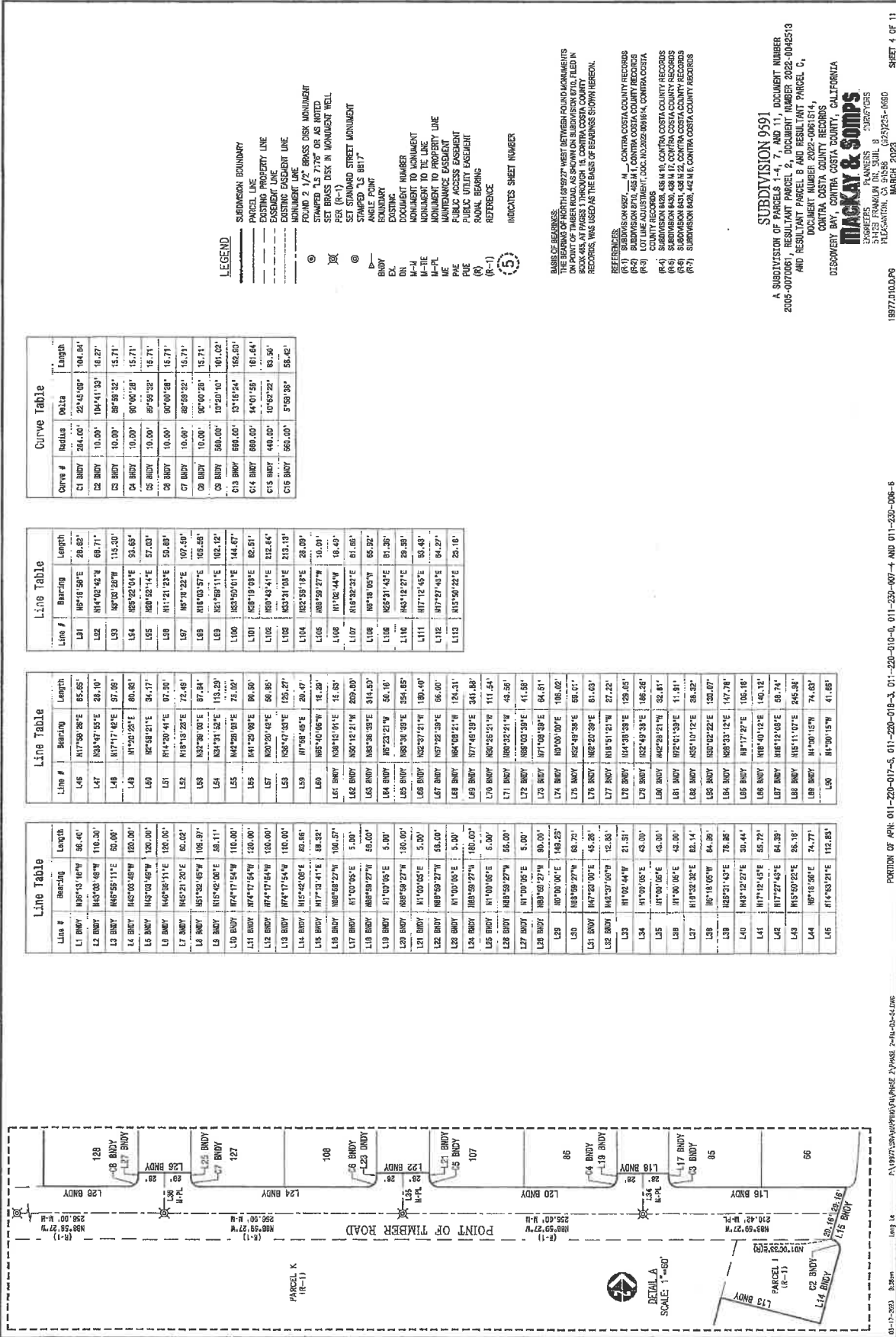
IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND THIS DAY 12 OF April, 2023.

MONICA NIÑO
CLERK OF THE BOARD OF SUPERVISORS OF
CONTRA COSTA COUNTY,
STATE OF CALIFORNIA



BY: *Monica Niño*
MONICA NIÑO
DEPUTY CLERK
CONTRA COSTA COUNTY,
STATE OF CALIFORNIA

SUBDIVISION 9591:
A SUBDIVISION OF PARCELS 1-4, 7, AND 11, DOCUMENT NUMBER 2005-070061, RESULTANT PARCEL 2, DOCUMENT NUMBER 2022-0042519 AND RESULTANT PARCEL 8 AND RESULTANT PARCEL C,
DOCUMENT NUMBER 2022-0081614,
CONTRA COSTA COUNTY, CALIFORNIA
DISCOVERY BAY - CONTRA COSTA COUNTY, CALIFORNIA
MACKAY & SOMPS
ENGINEERS PLANNERS SURVEYORS
51429 FRANKLIN DR. SUITE B
PUNASANTON, CA 94532-2205
MARCH 2023



Line Table

Line #	Bearing	Length
L1 BNDY	N06°43'10"W	96.40'
L2 BNDY	N43°03'48"W	110.30'
L3 BNDY	N45°56'11"E	60.00'
L4 BNDY	N45°03'48"W	120.00'
L5 BNDY	N43°03'48"W	120.00'
L7 BNDY	N45°21'20"E	62.02'
L8 BNDY	N01°52'45"W	106.97'
L9 BNDY	N15°42'00"E	38.11'
L10 BNDY	N04°17'54"W	110.00'
L11 BNDY	N04°17'54"W	120.00'
L12 BNDY	N74°19'54"W	120.00'
L13 BNDY	N74°19'54"W	110.00'
L14 BNDY	N15°42'00"E	82.86'
L15 BNDY	N17°13'41"E	88.92'
L16 BNDY	N00°00'00"E	100.57'
L17 BNDY	N00°00'00"E	50.00'
L18 BNDY	N00°00'00"E	50.00'
L19 BNDY	N10°00'00"E	50.00'
L20 BNDY	N00°00'00"E	50.00'
L21 BNDY	N10°00'00"E	50.00'
L22 BNDY	N00°00'00"E	50.00'
L23 BNDY	N10°00'00"E	50.00'
L24 BNDY	N00°00'00"E	50.00'
L25 BNDY	N00°00'00"E	50.00'
L26 BNDY	N00°00'00"E	50.00'
L27 BNDY	N00°00'00"E	50.00'
L28 BNDY	N00°00'00"E	50.00'
L29 BNDY	N00°00'00"E	50.00'
L30 BNDY	N00°00'00"E	50.00'
L31 BNDY	N00°00'00"E	50.00'
L32 BNDY	N00°00'00"E	50.00'
L33 BNDY	N00°00'00"E	50.00'
L34 BNDY	N00°00'00"E	50.00'
L35 BNDY	N00°00'00"E	50.00'
L36 BNDY	N00°00'00"E	50.00'
L37 BNDY	N00°00'00"E	50.00'
L38 BNDY	N00°00'00"E	50.00'
L39 BNDY	N00°00'00"E	50.00'
L40 BNDY	N00°00'00"E	50.00'
L41 BNDY	N00°00'00"E	50.00'
L42 BNDY	N00°00'00"E	50.00'
L43 BNDY	N00°00'00"E	50.00'
L44 BNDY	N00°00'00"E	50.00'
L45 BNDY	N00°00'00"E	50.00'
L46 BNDY	N00°00'00"E	50.00'

Line Table

Line #	Bearing	Length
L46	N17°50'28"E	85.69'
L47	N43°03'48"E	28.10'
L48	N17°17'48"E	97.88'
L49	N10°00'00"E	80.50'
L50	N02°48'21"E	36.17'
L51	N14°20'41"E	97.30'
L52	N18°13'20"E	72.48'
L53	N02°50'00"E	97.84'
L54	N34°31'52"E	113.29'
L55	N42°28'05"E	75.00'
L56	N41°29'08"E	90.50'
L57	N20°20'42"E	50.85'
L58	N15°45'45"E	20.47'
L59	N05°47'30"E	126.27'
L60	N05°40'06"W	18.20'
L61 BNDY	N08°12'01"E	15.89'
L62 BNDY	N50°12'21"W	203.00'
L63 BNDY	N05°38'38"E	314.50'
L64 BNDY	N07°23'21"W	50.10'
L65 BNDY	N08°18'30"E	354.82'
L66 BNDY	N02°37'21"E	190.40'
L67 BNDY	N57°22'33"E	66.00'
L68 BNDY	N04°03'21"W	124.31'
L69 BNDY	N17°48'49"E	341.88'
L70 BNDY	N30°35'21"E	111.54'
L71 BNDY	N00°32'21"W	49.50'
L72 BNDY	N08°03'59"E	41.69'
L73 BNDY	N17°03'38"E	64.61'
L74 BNDY	N00°00'00"E	106.02'
L75 BNDY	N02°48'39"E	69.41'
L76 BNDY	N02°20'38"E	61.03'
L77 BNDY	N14°35'33"E	128.05'
L78 BNDY	N02°49'33"E	106.28'
L79 BNDY	N42°28'21"W	32.81'
L80 BNDY	N12°41'53"E	11.81'
L81 BNDY	N05°10'12"E	38.32'
L82 BNDY	N03°02'22"E	130.07'
L83 BNDY	N09°31'12"E	147.78'
L84 BNDY	N09°17'27"E	106.18'
L85 BNDY	N10°40'12"E	140.12'
L86 BNDY	N16°12'45"E	69.74'
L87 BNDY	N15°11'07"E	246.38'
L88 BNDY	N10°15'54"W	74.83'
L89 BNDY	N14°53'21"E	41.88'

Curve Table

Curve #	Radius	Delta	Length
C1 BNDY	284.00'	22°45'00"	104.94'
C2 BNDY	10.00'	104°41'33"	16.27'
C3 BNDY	10.00'	89°38'32"	15.71'
C4 BNDY	10.00'	80°00'28"	15.71'
C5 BNDY	10.00'	89°39'32"	15.71'
C6 BNDY	10.00'	80°00'28"	15.71'
C7 BNDY	10.00'	89°38'32"	15.71'
C8 BNDY	10.00'	80°00'28"	15.71'
C9 BNDY	560.00'	10°20'10"	101.02'
C10 BNDY	560.00'	10°20'10"	101.02'
C11 BNDY	440.00'	10°20'22"	85.90'
C12 BNDY	560.00'	5°00'38"	58.42'

LEGEND

- SUBDIVISION BOUNDARY
- PARCEL LINE
- EXISTING PROPERTY LINE
- EXISTING CURVE LINE
- PROPOSED CURVE LINE
- MONUMENT
- ROUND 2 1/2" BRASS DISK MONUMENT
- STAMPED "S 8817"
- SET BRASS DISK IN MONUMENT WELL PER (R-1)
- SET STANDARD STREET MONUMENT
- ANGLE POINT
- BRASS DISK MONUMENT
- EXISTING MONUMENT
- DOCUMENT NUMBER
- MONUMENT TO MONUMENT
- MONUMENT TO THE LINE
- MONUMENT TO PROPERTY LINE
- MAINTENANCE EASEMENT
- PUBLIC ACCESS EASEMENT
- RAILROAD EASEMENT
- RURAL EASEMENT
- REFERENCE
- (R-1)
- (5)
- INDICATES SHEET NUMBER

NOTES OF RECORDS:
THE SUBDIVISION IS LOCATED WITHIN THE 1927 ZONING MAP OF THE CITY OF COSTA MESA, CALIFORNIA, AS SHOWN ON SUBDIVISION 9516, FILED IN BOOK 465, AT PAGES 1 THROUGH 15, CONTRA COSTA COUNTY RECORDS, WAS USED AS THE BASIS OF BEARINGS SHOWN HEREON.

REFERENCES:
SUBDIVISION 9516, CONTRA COSTA COUNTY RECORDS (R-1)
SUBDIVISION 9714, CONTRA COSTA COUNTY RECORDS (R-2)
LOT LINE ADJUSTMENT, DOC. NO. 2022-006164, CONTRA COSTA COUNTY RECORDS (R-3)
SUBDIVISION 651119, CONTRA COSTA COUNTY RECORDS (R-4)
SUBDIVISION 840,438 IN 12, CONTRA COSTA COUNTY RECORDS (R-5)
SUBDIVISION 840,438 IN 12, CONTRA COSTA COUNTY RECORDS (R-6)
SUBDIVISION 840,438 IN 12, CONTRA COSTA COUNTY RECORDS (R-7)
SUBDIVISION 840,438 IN 12, CONTRA COSTA COUNTY RECORDS (R-8)

SUBDIVISION 9591
A SUBDIVISION OF PARCELS 1-4, 7, AND 11, DOCUMENT NUMBER 2025-0070851, RESULTANT PARCEL 2, DOCUMENT NUMBER 2022-0042513 AND RESULTANT PARCEL 8 AND RESULTANT PARCEL C, DOCUMENT NUMBER 2025-0061514, CONTRA COSTA COUNTY RECORDS, CONTRA COSTA COUNTY, CALIFORNIA

MACKAY & SOONS
PLANNERS
318 METERS
51423 FRANKLIN DR., SUITE 8
PLEASANTON, CA 94588
PHONE: 925-725-1650
FAX: 925-725-1650
MAY 2025

18977.D10.D.P6
SHEET 4 OF 11

PORTION OF APRN: 011-220-017-5, 011-220-018-3, 011-220-010-0, 011-230-007-4 AND 011-230-008-6

01-17-2023 8:38am
18977.D10.D.P6
SHEET 4 OF 11

LEGEND

- SUBDIVISION BOUNDARY
- PARCEL LINE
- EXISTING PROPERTY LINE
- EXISTING EASEMENT LINE
- EXISTING EASEMENT LINE
- MONUMENT LINE
- FOUND 2 1/2" BRASS DISK MONUMENT
- SET BRASS DISK IN MONUMENT WELL
- SET STANDARD STREET MONUMENT
- STAMPED "LS 8817"
- ANGLE POINT
- BOUNDARY
- EXISTING
- DOCUMENT NUMBER
- MONUMENT TO MONUMENT
- MONUMENT TO PROPERTY LINE
- MONUMENT TO PROPERTY LINE
- MAINTENANCE EASEMENT
- PVE
- PUBLIC ACCESS EASEMENT
- PUBLIC UTILITY EASEMENT
- ADJACENT BEARING
- REFERENCE
- (R-1)
- (5)
- INDICATES SHEET NUMBER

BASE OF BEARINGS:
 THE BEARING OF NORTH 88° 50' 00" WEST BETWEEN ROUND MONUMENTS
 AND MONUMENT TO PROPERTY LINE WAS OBTAINED BY SURVEYOR P.D. FILED IN
 RECORD 485, AT PARCELS 1 THROUGH 8, IN CONTRA COSTA COUNTY RECORDS.
 RECORDS, WAS USED AS THE BASIS OF BEARINGS SHOWN HEREON.

REFERENCES:
 SUBDIVISION 9591, CONTRA COSTA COUNTY RECORDS
 (R-3) SUBDIVISION 9591, CONTRA COSTA COUNTY RECORDS
 (R-3) LOT LINE ADJUSTMENT, DOC. NO. 2022-048514, CONTRA COSTA
 COUNTY RECORDS
 (R-4) SUBDIVISION 828, 4384-10 CONTRA COSTA COUNTY RECORDS
 (R-4) SUBDIVISION 828, 4384-10 CONTRA COSTA COUNTY RECORDS
 (R-4) SUBDIVISION 828, 4384-10 CONTRA COSTA COUNTY RECORDS
 (R-7) SUBDIVISION 828, 4384-10 CONTRA COSTA COUNTY RECORDS

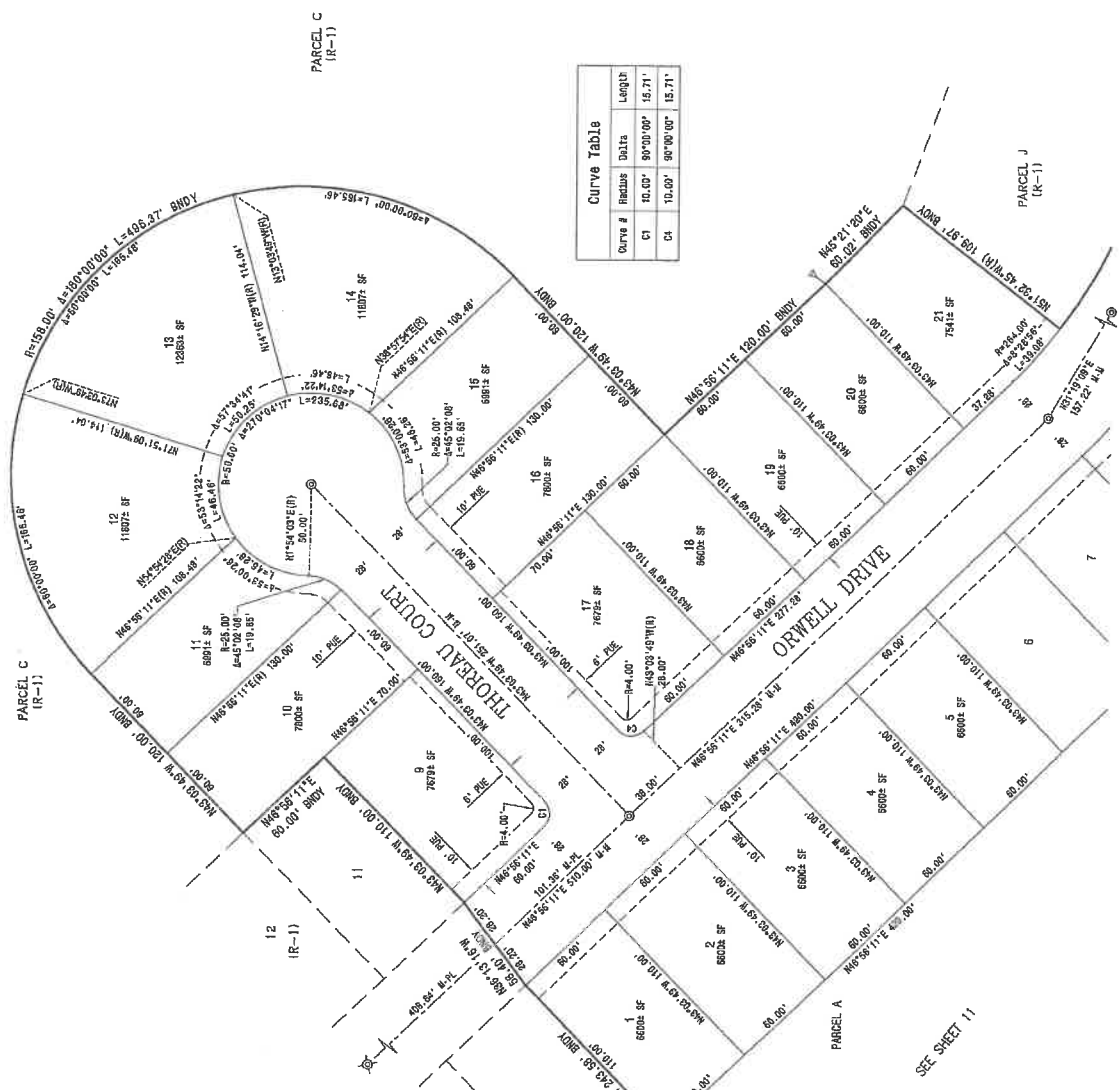


SCALE: 1"=40'
 0 20 40 80

SUBDIVISION 9591
 A SUBDIVISION OF PARCELS 1-4, 7, AND 11, DOCUMENT NUMBER
 2005-070051, RESULTANT PARCEL 2, DOCUMENT NUMBER 2022-0042513
 AND RESULTANT PARCEL 6 AND RESULTANT PARCEL C,
 DOCUMENT NUMBER 2022-081614,
 CONTRA COSTA COUNTY RECORDS

MACKAY & SOOPS
 SURVEYORS
 51428 HAMPDEN DR. SUITE 9
 PLEASANTON, CA 94566
 925-327-0850
 MARCH 2023

18977010.DWG
 PORTION OF APN 011-220-017-5, 011-220-018-3, 011-220-019-0, 011-220-007-4, AND 011-220-008-5
 SEE SHEET 6
 SHEET 5 OF 11



Curve Table

Curve #	Radius	Delta	Length
C1	10.00'	90°00'00"	15.71'
C1	10.00'	90°00'00"	15.71'

LEGEND

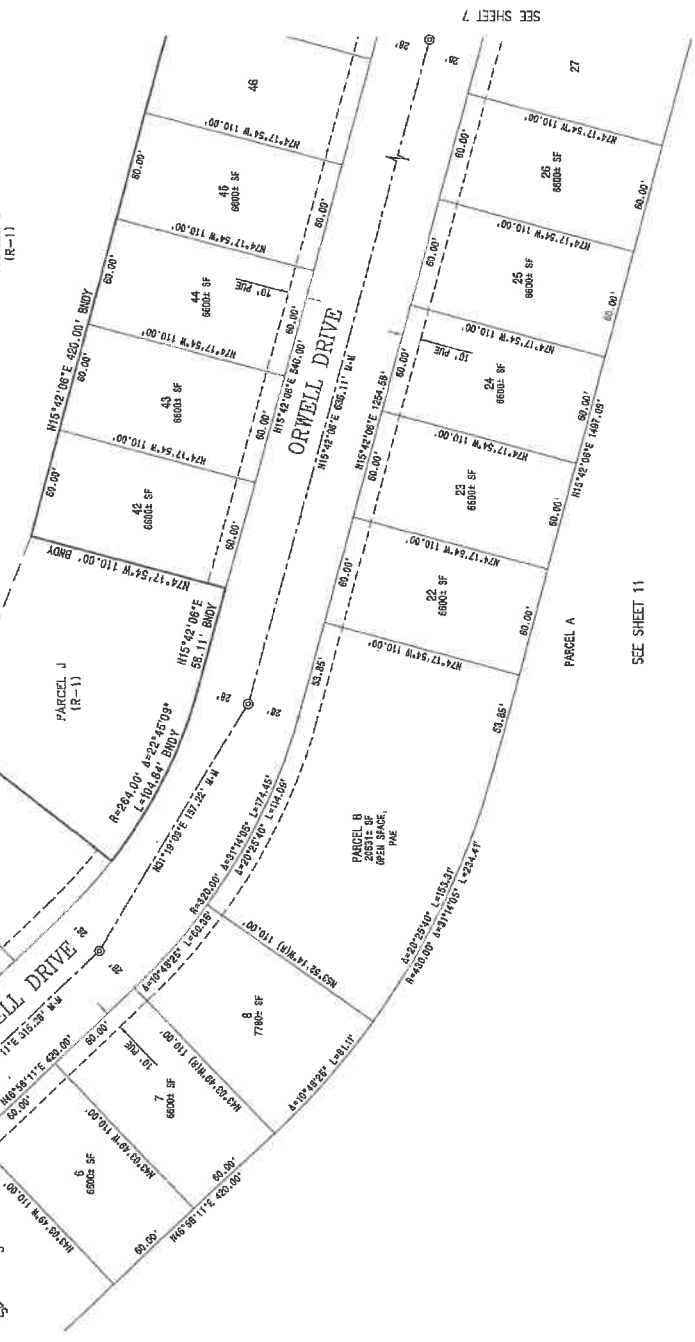
- SUBDIVISION BOUNDARY
- PARCEL LINE
- CONVEYANCE PROPERTY LINE
- EASEMENT LINE
- EXISTING EASEMENT LINE
- MONUMENT LINE
- ROUND 2 1/2" BRASS DISK MONUMENT
- STAMPED "L3 7176" OR AS NOTED
- PER (R-1)
- SET BRASS DISK IN MONUMENT WELL
- SET SURVEY STREET MONUMENT
- SET SURVEY STREET MONUMENT
- ANGLE POINT
- BOUNDARY
- BOUNDARY
- EXISTING
- DOCUMENT NUMBER
- MONUMENT TO MONUMENT
- MONUMENT TO THE LINE
- MONUMENT TO PROPERTY LINE
- MAINTENANCE EASEMENT
- PUBLIC ACCESS EASEMENT
- PUBLIC UTILITY EASEMENT
- PAVING BEARING
- REFERENCE
- (R-1)
- (R)
- (R-1)

INDICATES SHEET NUMBER

MASS OF BEARINGS: ALL BEARINGS WERE REVERSE BEARING MONUMENTS ON POINT OF NUMBER ROAD, AS SHOWN ON SURVEY RECORDS, FILED IN BOOK 463, AT PAGES 1 THROUGH 15, CONTRA COSTA COUNTY RECORDS. WAS USED AS THE BASIS OF BEARINGS SHOWN HEREON.

REFERENCES:
 (R-1) SUBDIVISION 9591, CONTRA COSTA COUNTY RECORDS
 (R-2) SUBDIVISION 8710, CONTRA COSTA COUNTY RECORDS
 (R-3) LOT LINE ADJUSTMENT, DOC. NO. 2022-00616 H, CONTRA COSTA COUNTY RECORDS
 (R-4) SUBDIVISION 8343, CONTRA COSTA COUNTY RECORDS
 (R-5) SUBDIVISION 8433, CONTRA COSTA COUNTY RECORDS
 (R-6) SUBDIVISION 8451, CONTRA COSTA COUNTY RECORDS
 (R-7) SUBDIVISION 8451, CONTRA COSTA COUNTY RECORDS

REFERENCES:
 (R-1) SUBDIVISION 9591, CONTRA COSTA COUNTY RECORDS
 (R-2) SUBDIVISION 8710, CONTRA COSTA COUNTY RECORDS
 (R-3) LOT LINE ADJUSTMENT, DOC. NO. 2022-00616 H, CONTRA COSTA COUNTY RECORDS
 (R-4) SUBDIVISION 8343, CONTRA COSTA COUNTY RECORDS
 (R-5) SUBDIVISION 8433, CONTRA COSTA COUNTY RECORDS
 (R-6) SUBDIVISION 8451, CONTRA COSTA COUNTY RECORDS
 (R-7) SUBDIVISION 8451, CONTRA COSTA COUNTY RECORDS



SCALE: 1"=40'

SUBDIVISION 9591
 A SUBDIVISION OF PARCELS 1-4, 7, AND 11, DOCUMENT NUMBER 2005-0070651, RESULTANT PARCEL 2, DOCUMENT NUMBER 2022-0042513 AND RESULTANT PARCEL B AND RESULTANT PARCEL C, DOCUMENT NUMBER 2022-00616 H, CONTRA COSTA COUNTY RECORDS DISCOVERY BAY, CONTRA COSTA COUNTY, CALIFORNIA

Mackay & Somp's
 SURVEYORS
 5425 FRANKLIN DR. SUITE 9
 PLEASANTON, CA 94563 (925) 722-0450
 MARCH 2023

199777.00.DWG
 SHEET 6 OF 11

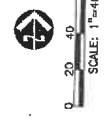
EXHIBIT "A"
 Page 7 of 12

LEGEND

- SUBDIVISION BOUNDARY
- PARCEL LINE
- EXISTING PROPERTY LINE
- EXISTING EASEMENT LINE
- EXISTING EASEMENT LINE
- MONUMENT LINE
- FOUND 2 1/2" BRASS DISK MONUMENT STAMPED "S 7725" OR AS NOTED
- SET BRASS DISK IN MONUMENT WELL PER (R-1)
- SET STANDARD STREET MONUMENT STAMPED "S 3817"
- ANGLE POINT
- BOUNDARY
- EX
- DN
- MONUMENT NUMBER
- MONUMENT TO MONUMENT
- MONUMENT TO THE LINE
- MONUMENT TO PROPERTY LINE
- MAINTENANCE EASEMENT
- PUBLIC ACCESS EASEMENT
- PUBLIC UTILITY EASEMENT
- RAILROAD EASEMENT
- REFERENCE
- (R-1)
- (S)
- INDICATES SHEET NUMBER

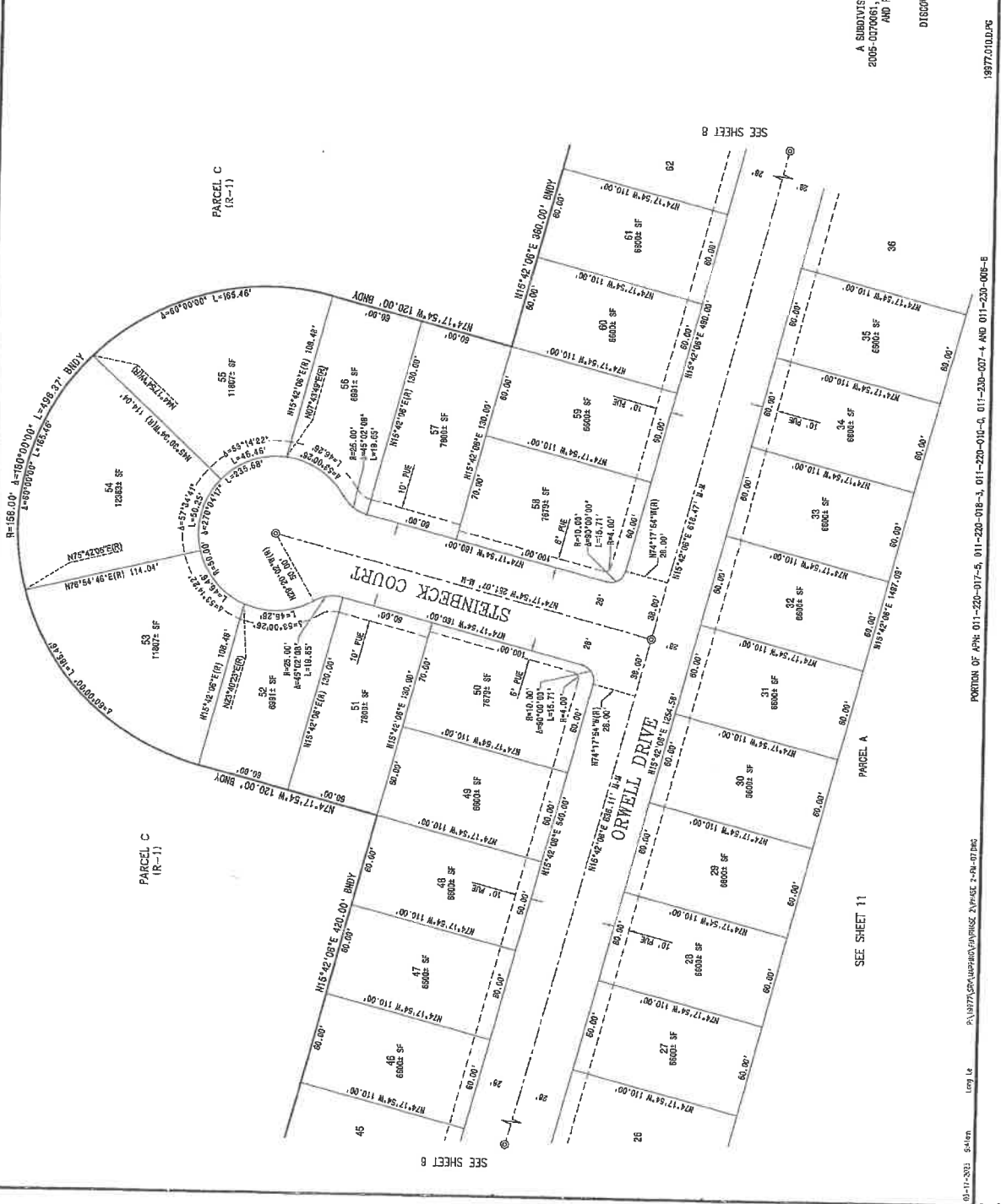
BASE OF BEARINGS:
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- REFERENCES:**
- (R-1) SUBDIVISION 4877, M., CONTRA COSTA COUNTY RECORDS
 - (R-2) SUBDIVISION 4749, M., CONTRA COSTA COUNTY RECORDS
 - (R-3) SUBDIVISION 4749, M., CONTRA COSTA COUNTY RECORDS
 - (R-4) SUBDIVISION 4749, M., CONTRA COSTA COUNTY RECORDS
 - (R-5) SUBDIVISION 4749, M., CONTRA COSTA COUNTY RECORDS
 - (R-6) SUBDIVISION 4749, M., CONTRA COSTA COUNTY RECORDS
 - (R-7) SUBDIVISION 4749, M., CONTRA COSTA COUNTY RECORDS



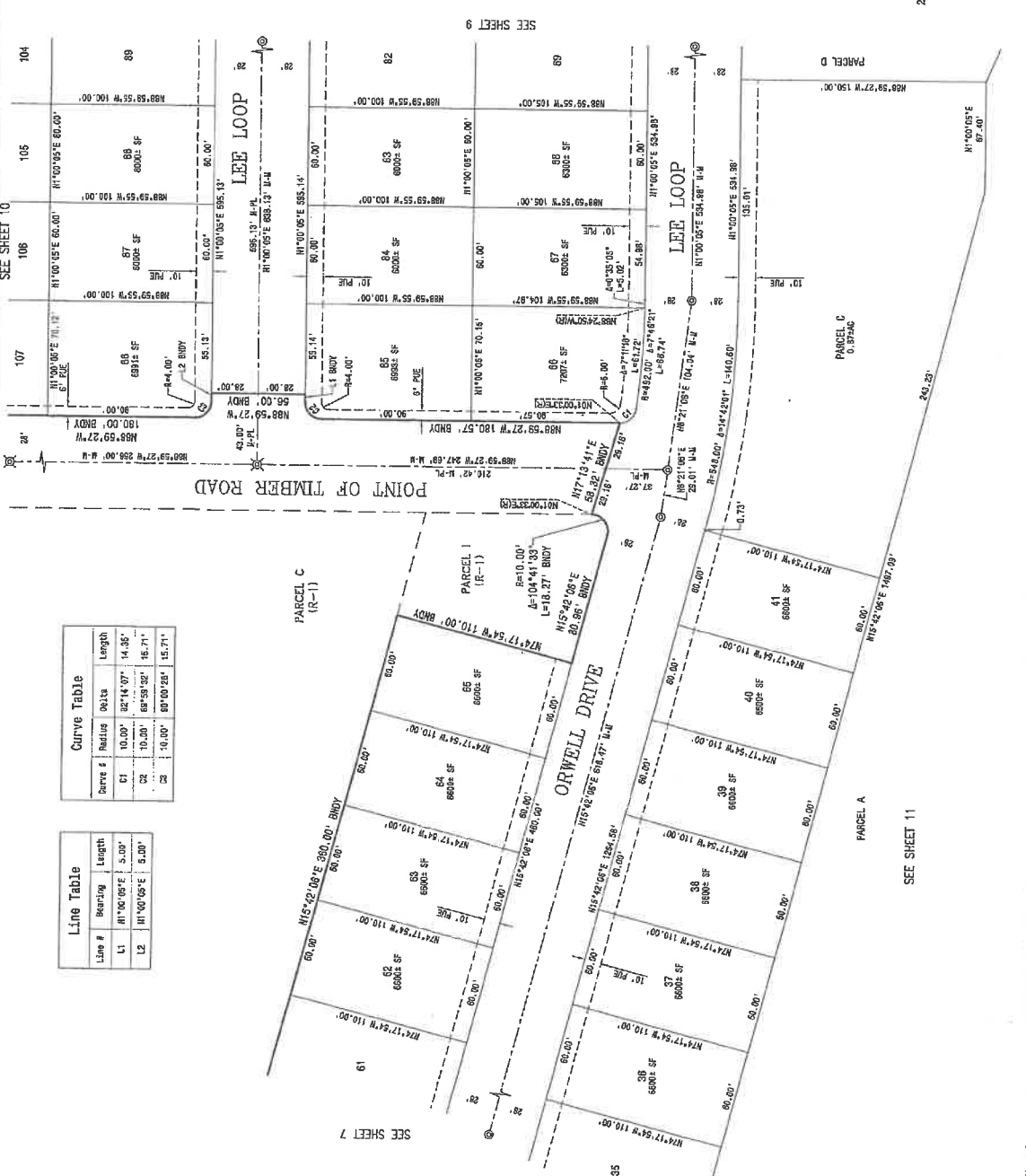
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 A SUBDIVISION OF PARCELS 1-4, 7, AND 11, DOCUMENT NUMBER 2005-0070051, RESULTANT PARCEL B, DOCUMENT NUMBER 2022-0042513 AND RESULTANT PARCEL C, DOCUMENT NUMBER 2022-0042513, DOCUMENT NUMBER 2022-0042514, CONTRA COSTA COUNTY RECORDS, DISCOVERY BAY, CONTRA COSTA COUNTY, CALIFORNIA

MACKAY & SOMPS
 ENGINEERS PLANNERS SURVEYORS
 1625 SAN JOAQUIN AVENUE, SUITE B
 PLEASANTON, CALIFORNIA 94566
 MARCH 2023



Line #	Bearing	Length
L1	N1°00'00"E	5.00'
L2	N1°00'00"E	5.00'

Curve #	Radius	Delta	Length
C1	10.00'	32°14'07"	14.85'
C2	10.00'	88°58'28"	15.71'
C3	10.00'	87°00'28"	15.71'



Curve #	Radius	Delta	Length
C1	10.00'	32°14'07"	14.85'
C2	10.00'	88°58'28"	15.71'
C3	10.00'	87°00'28"	15.71'

Line #	Bearing	Length
L1	N1°00'00"E	5.00'
L2	N1°00'00"E	5.00'

SEE SHEET 7

SEE SHEET 9

SEE SHEET 10

SEE SHEET 11

LEGEND

- SUBDIVISION BOUNDARY
- PARCEL LINE
- EXISTING PROPERTY LINE
- EASEMENT LINE
- EXISTING EASEMENT LINE
- MONUMENT LINE
- FOUND 2 1/2" BRASS DISK MONUMENT
- STAMPED "S 7776" OR AS NOTED
- STAMPED "S 7776" OR AS NOTED
- PER (R-1)
- SET STANDARD STREET MONUMENT
- STAMPED "S 8817"
- ANGLE POINT
- BOUNDARY
- EXISTING
- DOCUMENT NUMBER
- MONUMENT TO BE LINE
- MONUMENT TO PROPERTY LINE
- MAINTENANCE EASEMENT
- PUBLIC ACCESS EASEMENT
- PUBLIC UTILITY EASEMENT
- RADIAL BEARING
- REFERENCE
- INDICATES SHEET NUMBER

BASE OF BEARINGS
ON POINT OF TIMBER ROAD, AS SHOWN ON SUBDIVISION 871A, FILED IN
RECORDS OF THE COUNTY RECORDER, COUNTY OF CONTRA COSTA, CALIFORNIA.
RECORDS WAS USED AS THE BASIS OF BEARINGS SHOWN HEREON.

REFERENCES:
(R-1) SUBDIVISION 827, N. CONTRA COSTA COUNTY RECORDS
(R-2) SUBDIVISION 871A, CONTRA COSTA COUNTY RECORDS
(R-3) SUBDIVISION 871B, CONTRA COSTA COUNTY RECORDS
(R-4) SUBDIVISION 842, 488 H. CONTRA COSTA COUNTY RECORDS
(R-5) SUBDIVISION 849, 488 H. CONTRA COSTA COUNTY RECORDS
(R-6) SUBDIVISION 842, 488 H. CONTRA COSTA COUNTY RECORDS
(R-7) SUBDIVISION 842, 488 H. CONTRA COSTA COUNTY RECORDS

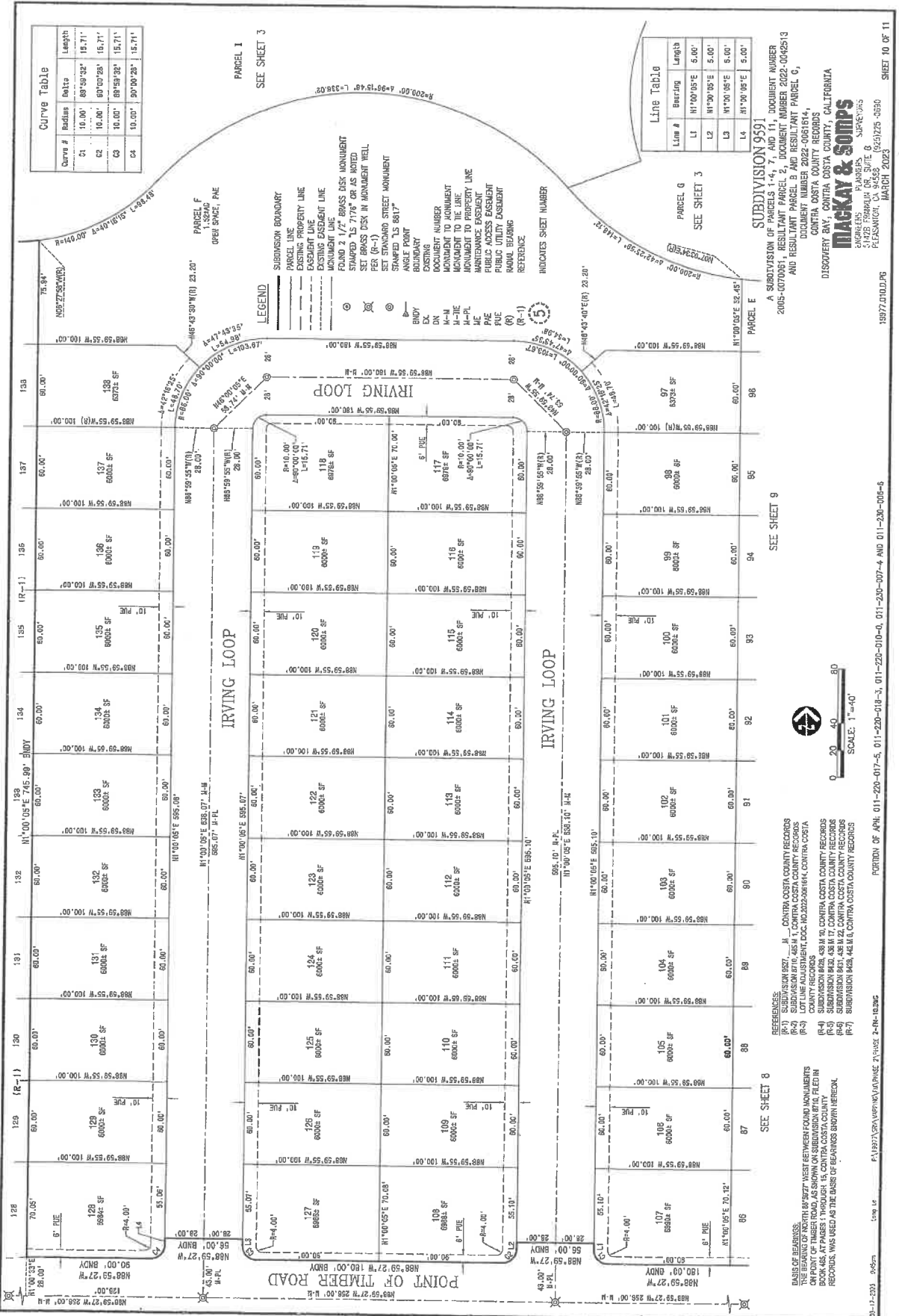
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SUBDIVISION 9591
A. SUBDIVISION OF PARCELS 1-4, 7, AND 11, DOCUMENT NUMBER
2005-007061, RESULTANT PARCEL 2, DOCUMENT NUMBER 2022-0042513
AND RESULTANT PARCEL B AND RESULTANT PARCEL C,
DOCUMENT NUMBER 2022-0061614,
CONTRA COSTA COUNTY RECORDS
DISCOVERED BY: CONTRA COSTA COUNTY, CALIFORNIA
HACKAY & SOMPS
ENGINEERS PLANNERS SURVEYORS
5142 FRANKLIN DR., SUITE B
PILLSBURY, CA 94559 (925)223-0690
MARCH 2023

19977.010.D.P.6
SHEET 8 OF 11

PORTION OF APR. 011-220-017-5, 011-220-018-3, 011-220-019-0, 011-220-019-1, AND 011-220-006-6

EXHIBIT "A"
Page 9 of 12



CERTIFICATE OF ACCEPTANCE
(Government Code § 27281)

The East Contra Costa Irrigation District (“ECCID”) hereby certifies its acceptance of the attached Grant Deed from Pulte Home Company, LLC in favor of ECCID and dated July 13, 2023. This acceptance is made pursuant to authority granted on September 13, 2023, at a regular meeting of the Board of Directors of ECCID on motion duly made, seconded and unanimously carried, and is certified to by the signature of the ECCID’s General Manager affixed hereto.

Dated: September 13, 2023

EAST CONTRA COSTA IRRIGATION DISTRICT

By: 

Aaron Trott

Its: General Manager

CALIFORNIA ACKNOWLEDGMENT

CIVIL CODE § 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California }
County of Contra Costa }

On January 30, 2024 before me, Denise Shaffer, Notary Public
Date Here Insert Name and Title of the Officer

personally appeared Aaron Troth
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.



I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Denise Shaffer
Signature of Notary Public

Place Notary Seal and/or Stamp Above

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Certificate of Acceptance
Document Date: September 13, 2023 Number of Pages: 1
Signer(s) Other Than Named Above: N/A

Capacity(ies) Claimed by Signer(s)

Signer's Name: Aaron Troth
Signer's Name:
[] Corporate Officer - Title(s):
[] Corporate Officer - Title(s):
[] Partner - [] Limited [] General
[] Partner - [] Limited [] General
[] Individual [] Attorney in Fact
[] Individual [] Attorney in Fact
[] Trustee [] Guardian or Conservator
[] Trustee [] Guardian or Conservator
[X] Other: General Manager
[] Other:
Signer is Representing: ECCID
Signer is Representing:

CONTRA COSTA COUNTY HAZARDOUS MATERIALS COMMISSION



February 28, 2024

Will Nelson, Principal Planner
Contra Costa County
Department of Conservation and Development
30 Muir Road, Martinez, CA 94553

Re: Comments on the final Draft General Plan for Unincorporated Contra Costa County

Dear Mr. Nelson:

On behalf of the Contra Costa County Hazardous Materials Commission, I am writing to express our gratitude for the many additions and changes you have made to the draft General Plan based on the input from the Commission. Below are consensus recommendations in underline/~~strikeout~~ form the Commission voted on at our February 22, 2024 meeting on a few remaining outstanding concerns with the draft General Plan.

Health and Safety Element

Goal 2 – Air quality in Impacted Communities

*Action 2.1 - Partner with community members and regulatory agencies **to conduct data collection and monitoring of pollution exposure**, and prepare a community-scale plan for reducing and mitigating air pollutant emissions and industrial hazards, such as pipeline risks, accidents, potential water or soil contamination, and impacts to sensitive ecological resources for each Impacted Community, or group of Impacted Communities, as appropriate. Require future projects to demonstrate consistency with those plans.*

Goal 9 - Management of Hazardous Materials and Hazardous Waste

Policy 9.2 - Ensure CCHMP staff have an opportunity to review and comment on development applications for projects involving use of hazardous materials or hazardous waste.

The Commission understands that all development applications that involve the use of hazardous materials or hazardous wastes are already scored by the Hazardous Materials Program through the requirements of County Ordinance Code Chapter 84-63, Land Use Permits for Development Projects Involving Hazardous Waste or Hazardous Materials. Therefore, this Policy is potentially redundant of existing County requirements. However, this policy should be clear that the Hazardous Materials Program should have the opportunity to make comments on all development applications for projects involving the use of hazardous materials or hazardous wastes in addition to scoring these projects.

Members: Fred Glueck, Chair, Tim Bancroft, Soheila Bana, Marielle Boortz, Maureen Brennan, Drew Graham, Mark Hughes, Jim Payne, Jamin Pursell, George Smith, Anthony Tave, Julian Vinatieri

Policy 9.7 - Prioritize implementation of safety projects that reduce the risk of hazardous materials transportation accidents along hazardous material transportation corridors in Impacted Communities. ~~to address high-risk scenarios.~~

The Commission believes this policy would be clearer if it specified the type of projects to prioritize. The Commission also believes it is redundant to say these projects are to address high-risk scenarios.

Policy 9.8 - Require applicants for all projects in Impacted Communities that involve hazardous materials or hazardous waste to provide clear information in plain language about potential hazards their projects pose to nearby residents at the beginning of the review process. Review and verify this information, make it available to residents, and ~~encourage~~ require project applicants to host at least one community meeting to discuss potential hazards.

The Commission believes that this information should be required for all communities in unincorporated Contra Costa County, and this policy should make it clear that this information should be provided at the beginning of the process, before any permits have been issued or government decisions have been made, and that the public meetings should be required.

Action 9.3 - HS-A9.3 Provide information to county residents about less toxic alternatives to household products containing universal wastes-hazardous materials and the safe handling, storage, and disposal of such products, including pharmaceuticals.

The Commission believes the term “universal wastes” was used in error, because products do not contain wastes, they contain materials. In this case, the Action was focused on providing less-toxic alternatives, therefore “hazardous materials” is the appropriate substitution.

Thank you for your consideration of the Hazardous Materials Commission’s comments. If you have any questions, please contact Michael Kent, Executive Assistant to the Commission at (925) 250-3227.

Sincerely,



Fred Glueck, Chairperson

Cc Contra Costa County Board of Supervisors

From: Email Request
Sent: Thursday, February 29, 2024 4:10 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Fossil Fuel in Our East Bay

From: Randy Monroe <randy@monroescienceed.com>
Sent: Thursday, February 29, 2024 4:10:10 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Fossil Fuel in Our East Bay

You don't often get email from randy@monroescienceed.com. [Learn why this is important](#)

To Whom It May Concern,

1. The Very Good News is that staff is committing to create a new land use ordinance to prohibit development of new oil and gas wells and phase out existing operations. Yes! This process would begin after approval of the General Plan by the Board of Supervisors, probably in late summer 2024. The study and ordinance development could take a year beyond that. Then the Board of Supervisors would have to vote to approve the ordinance.

— 🙌 **Thank staff for committing to this drilling ordinance, and tell them you also want to see a moratorium in place to prevent any more permit approvals while the new ordinance is developed.** Communities adjacent to Contra Costa oil fields must be fully protected while new policy is worked up.

2. We are pleased to see a requirement for 3,200' setbacks, but would like to see even stronger protection in place. (Like that promised ban!)

— 🙌 **Tell staff current research shows that a 3,200-foot setback from drilling sites is on the lower end of the range of distances that could reduce the harmful health—and quality of life—impacts from toxic emissions and exposures.** A 2021 [Stanford study](#) found negative health impacts within a 2.5 mile radius from oil and gas facilities. The state health panel which declared 3,200' setbacks the minimum protective distance also found that **the most health-protective approach is actually no drilling at all.** Let's *fully* protect Contra Costa residents, and our climate.

3. Current oil and gas production in the County is woefully under-monitored by state and local air regulators, leaving Contra Costa residents at risk.

— 🙌 **Ask staff to require regular, periodic monitoring of existing oil and gas infrastructure of methane and other dangerous emissions.**

Randy Monroe

Phone: (925)969-0808

Mobile: (925)788-6910



Website: MonroeScienceEd.com

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: CC county drilling policy comments
Date: Thursday, February 29, 2024 2:21:35 PM

From: Veronica G <thevern@gmail.com>
Sent: Thursday, February 29, 2024 2:20:51 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: CC county drilling policy comments

You don't often get email from thevern@gmail.com. [Learn why this is important](#)

Hello,

First off, I want to thank you for committing to create a new land use ordinance to prohibit development of new oil and gas wells, and also phase out existing operations. It would be great to also see a moratorium in place to prevent any more permit approvals while the new ordinance is developed. Protecting all communities is critical!

I would also love to see even stronger protection in place over and above the current 3200' setback requirement. It may seem like a lot, but negative health impacts have been shown within a 2.5 mile radius of oil and gas facilities. And of course, the best approach for a healthy environment is no drilling at all. In the current state of things, we should be moving away from oil and gas as fast as possible and moving towards renewables and green energy. The more focus we're able to put on alternatives, the quicker that better, efficient, reliable green technology will be developed.

Lastly, oil and gas production here is severely under-monitored by state and local air regulators, which is problematic. The county needs to step up and put in place routine periodic monitoring of existing oil and gas infrastructure of methane and other dangerous emissions with strict testing limits and swift, significant punishments for violations.

Thank you,
Veronica Geczi
Contra Costa resident (Kensington, CA)

From: JAIME PEREZ <perezvidalj@gmail.com>

Sent: Sunday, March 3, 2024 5:11:17 PM (UTC-08:00) Pacific Time (US & Canada)

To: Email Request <email@envisioncontracosta2040.org>

Subject: Contra Costa future oil drilling policy

You don't often get email from perezvidalj@gmail.com. [Learn why this is important](#)

Dear people,

I hope this message finds you well. I want to express my sincere appreciation for the commitment of the staff to create a new land use ordinance that will prohibit the development of new oil and gas wells and phase out existing operations. This is a significant step towards protecting our communities and our environment.

However, I also urge you to consider implementing a moratorium to prevent any further permit approvals while the new ordinance is being developed. It is crucial to ensure that communities adjacent to Contra Costa oil fields are fully protected during this transitional period.

Additionally, while the requirement for 3,200' setbacks is a positive development, I believe that stronger protection measures are necessary. Current research indicates that a 3,200-foot setback may not be sufficient to reduce the harmful health and quality of life impacts from toxic emissions and exposures. A Stanford study from 2021 found negative health impacts within a 2.5 mile radius from oil and gas facilities, highlighting the importance of more significant setbacks or, ideally, a complete ban on drilling.

Furthermore, it is concerning that current oil and gas production in the County is under-monitored by state and local air regulators, putting Contra Costa residents at risk. I urge you to require regular, periodic monitoring of existing oil and gas infrastructures for methane and other dangerous emissions to ensure the safety and well-being of our communities.

Thank you for your attention to these important matters. I look forward to your continued

efforts to protect our community and our environment.

Best regards,

Jaime Perez 2159 Northshore Drive Richmond CA 94804

From: Email Request
Sent: Saturday, March 9, 2024 4:44 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Please no drilling in Contra Costa County!

From: Diana <nicca@igc.org>
Sent: Saturday, March 9, 2024 4:43:39 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request
Subject: Please no drilling in Contra Costa County!

[You don't often get email from nicca@igc.org. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

— 🙌 Thank you for committing to this drilling ordinance, and tell them you also want to see a moratorium in place to prevent any more permit approvals while the new ordinance is developed. Communities adjacent to Contra Costa oil fields must be fully protected while new policy is worked up.

2. We are pleased to see a requirement for 3,200' setbacks, but would like to see even stronger protection in place. (Like that promised ban!) — 🙌 Current research shows that a 3,200-foot setback from drilling sites is on the lower end of the range of distances that could reduce the harmful health—and quality of life—impacts from toxic emissions and exposures. A 2021 Stanford study (https://click.actionnetwork.org/ss/c/u001.nTQp_FEIcSHl649vCJCicq92jzclp0eId9x56LOsrblp5bZBhxDv5iolvSg6lIEsWyHKo2qI8bIVl6VLghooRE9GTGXG8xgt9QQFkdtqNP8GjK0A6BDzUyg1L_U7G-GzGOznKXWnEK4n5QyCZc7DwZ_heujZPiqXWHpYI00HzAfN-oUQoPP-bPMQr6MIwl3B7y7sTrbS1xsk2CxcgDw6cOEoAqGcmgnCT1VfuPMKfiOX3Tq4vkcKOPDK0lvuU8CK-8FMJu41EYc1cM4gcDXgu13cyeXw7FP13gvR2-veBaskgTkDKgWYFxu1nMC62JG7VWom4scxNyujW5Y4u-jFOkqXmKWfc012O_IFtdWDNT2NMFBE14pwf3tLKdMqpMUXva9GAKlifY5Vrjwwbu2w/447/UDHSQa96RdmSyCNYowu0bg/h3/h001.q7vNB3RxW_uLVoig8LkcAu_vCA6OXssr1dJcijQ1ghM) found negative health impacts within a 2.5 mile radius from oil and gas facilities. The state health panel which declared 3,200' setbacks the minimum protective distance also found that the most health-protective approach is actually no drilling at all. Let's fully protect Contra Costa residents, and our climate.

Current oil and gas production in the County is woefully under-monitored by state and local air regulators, leaving Contra Costa residents at risk.

— 🙌 Please require regular, periodic monitoring of existing oil and gas infrastructure of methane and other dangerous emissions.

Sincerely,
Diana Bohn
Berkeley

Contra Costa Building and Construction Trades Council

2727 Alhambra Ave. Suite 5
Martinez, CA 94553
FAX (925) 372-7414



Bill Whitney
C.E.O.
Phone (925) 228-0900

March 11, 2024

To: Will Nelson, Principal Planner
Contra Costa County
Department of Conservation and Development
30 Muir Road
Martinez, CA 94553

Email: To: Will.Nelson@dcd.cccounty.us Cc: County.Administrator@cao.cccounty.us;
John_Gioia@bos.cccounty.us; supervisorandersen@bos.cccounty.us; supervisor_burgis@bos.cccounty.us;
SupervisorCarlson@bos.cccounty.us; district5@bos.cccounty.us; tim-frank@msn.com;

Re: Climate Action Plan and General Plan Update

Mr. Nelson,

There is much to commend in the Draft Contra Costa County General Plan and Climate Action Plan Update. The big picture goals are inspiring. We want “good paying sustainable jobs, quality schools” and so forth. We also support the “ambitious actions...to reduce greenhouse gas emissions.” The plan’s goals with respect to housing are a big step forward, too, and because the newly generous zoning for housing is shaped by smart growth strategies, this too is aligned with efforts to reduce greenhouse gas emissions. However, there are some significant deficiencies that need remedies if we want to maximize progress towards these goals.

One key principle that underlies many of our comments is that because the General plan is the county plan with the most comprehensive scope, covering a full range of County operations, it is the best place to articulate how all the pieces fit together to achieve the larger vision. This is what engineers call systems thinking.

To illustrate systems thinking, consider that new affordable housing, if it is constructed at elevated densities near jobs and transit, isn’t just a housing solution; it’s a transportation and climate solution too. If it is built with exemplary attention to green building principles, it can be an even better climate solution. If that affordable housing is built with high road labor standards, it can be an employment and economic development solution too, helping to create a bigger middle class, which is generally good for the local economy.

The Building Trades pays attention to systems thinking because the good jobs that we seek do not magically materialize in response to stand alone “workforce development” or training programs. They are also co-benefits of investments in infrastructure, housing, economic development, climate mitigation and

other programs with construction components that arise most consistently when these investments are deliberately structured to use apprentices and to ensure quality jobs.

We have suggestions to make regarding housing, public lands and climate. These are to some extent interrelated. Every program or policy that includes high road labor standards for construction is effectively a housing solution, as paying a middle-class wage makes it easier to afford housing. By the same token, as we will explore later, high road labor standards produce higher quality construction that contributes to better climate performance.

The challenge is that high road labor isn't something you can take for granted. In the Bay Area, 55% of construction workers earn what the State Department of Housing and Community Development classifies as a low wage. Many low road construction employers also don't provide access to any classroom training, even for safety. This has made the construction industry one of the most dangerous in our economy. To put a fine point on it, the combination of low wages and dangerous working conditions are what in a manufacturing context would be called a sweatshop.

To protect against these problems, the County should insist that construction that the County can control follows high road practices. Incorporating high road labor standards into affordable housing programs, publicly funded green building, and other climate programs, and into economic development agreements for public lands is a priority for our Building Trades Council. These are all elements that need to be built into the County's general plan.

The use of the term "living wage jobs" is the best you can do for some industries, but not for the construction industry, where apprenticeable crafts all have assigned prevailing wages and state approved apprenticeship programs. The Prevailing Wage, defined in law by the Davis Bacon Act in 1931 as part of the New Deal, has played a central role in creating good middle-class jobs for union construction workers since that time, and is the right reference point for quality construction jobs. The best practice is to not only require prevailing wages for construction work but to organize as much of the work as possible under project labor agreements.

Housing:

Our first priority with respect to housing is to ensure that funds administered by the County for affordable housing production carry requirements that all projects that are 60 units or greater in size are covered by a Project Labor Agreement with targeted and local hire policies. The plan should commit the county to negotiate with the Building Trades with the objective of establishing such an agreement. The agreement should apply both to the County's own funds and to funds administered by the County that originate from other sources such as the Bay Area Housing Finance Agency.

We would also like to recommend a revision to the land use map to eliminate the Rural Residential land use designation (5 acre ranchettes) and to replace it with a Rural Reserve designation that would carry a 20 acre minimum parcel size.

Many New Urbanists, and even the U.S. EPA, have defined 5 acre ranchettes as the "devils density". Ranchette sprawl is extremely inefficient. It's not dense enough to provide a meaningful contribution towards the housing stock (or much construction work), or to support transit, but too dense to maintain optimal habitat or agricultural value. Development at this density is fiscally inefficient because it is expensive to serve with urban services. Development at this density spoils the potential to efficiently develop land later in the form of walkable neighborhoods (a kind of development we don't mind noting our members are more likely to build). There is no justification for it. A better practice is to hold rural

land in parcels that are 20 acres or more in size. For more on this, see chapter 11 in the following publication: https://www.epa.gov/sites/default/files/2014-01/documents/2009_essential_fixes_0.pdf

Public Lands:

The dispensation of public land for economic development offers an opportunity as a matter of policy to require high road labor practices for all construction. Specifically, the general plan should include a Public Lands policy that assures that all resulting construction is covered by a Project Labor Agreement with the Building and Construction Trades Council of Contra Costa County that features an appropriate local and targeted hire strategy.

Climate:

Contra Costa County has been the hub of the energy industry for Northern California for more than a century. The draft plan suggests, at least on a rhetorical level, that the county would like to continue that leadership through the transition towards a more sustainable future while maintaining a commitment to quality jobs. We think the commitment to growing green jobs, and to making them good jobs is important and would like to see more substance to deliver on that promise to make it more than rhetoric.

The Climate Action Plan does not present efforts to electrify buildings and transportation as part of a comprehensive system of decarbonization, and attention to detail that is essential to meeting climate goals is missing.

The BAAQMD's new game changing rules on water and space heating appliances for buildings, adopted in May 2023, are an important new development that has dramatically upped the ante, by forcing much more rapid electrification than had been anticipated when the County crafted its CAP. Now the County needs to do its part.

The Contra Costa Building and Construction Trades Council and every other Building Trades Council in the Bay Area jointly supported the Bay Area Air Quality Management District rules 9-4 and 9-6 because we know that these rules mandating electrification of heating appliances have the potential, if implemented correctly in concert with a broad suite of complementary measures, to help us meet both climate and employment goals that we favor.

The complication is that whether or how much electrification of heating appliances will reduce emissions depends on how efficient the appliances are, how potent the refrigerants used in heat pumps are as ghg pollutants, whether any of these escape at any point from installation to the decommissioning of the appliance, and how the electricity is being generated. The Air District doesn't have the resources or regulatory authority to address these issues on its own. Other agencies, including counties, need to do their part, and business as usual won't be sufficient.

The worst case scenario for electrification illustrates why we need to be careful. A resistance based electric heater, which is the low-cost electric option, operating at near 100% efficiency and drawing energy from a gas fired thermal power plant operating at typical 45% efficiency will generate twice the greenhouse gas pollution of an ordinary gas heater! Obviously, that is terrible math. However, we can do way better than that if we place an appropriate emphasis on proper installation of high performance appliances and greening the grid.

High Performance Appliances

Heat pump heaters and water heaters produce anywhere from 2 to 5 times the heating power (Coefficient Of Performance) of a resistance heater. The bottom end of that range is just treading water when plugged into a grid that is only half renewable. That won't get us where we need to go, but appliances at in the upper end of that range will start making a difference the day they are installed.

To reliably get the best environmental performance from heat pumps requires an efficient appliance, correctly sized, featuring a low ghg potential refrigerant. It also requires proper design, and flawless execution of installation, maintenance and decommissioning at the end of life. If there is a refrigerant leak, that impacts climate. If the refrigerants are over or under pressurized, that compromises efficiency and generates premature wear and tear on the system. It might seem like that there are a lot of factors that all need to be aligned to get the results we want, and that is true. The good news is that with a commitment to using the best available technology and to using a skilled construction workforce, we can get the job done.

High performance equipment is available and getting better with time. We favor the use of heat pumps that have a COP in the 3-5 range. While local regulatory authority to compel this level of appliance efficiency is federally preempted, what the County chooses to fund is not constrained. Any incentive programs the County funds, and all of the work it does on its own buildings, can and should set the example.

We also recommend using appliances that rely on refrigerants that have no more than 750 times the global warming potential of CO₂. This standard has been promoted by the CPUC in some proceedings.

Skilled workers can be found too. State licensed joint labor management apprenticeship programs for all of the relevant crafts are already providing robust training on critical green building skills. If public programs make a deliberate point of using contractors who are utilizing these training programs, they will get better work done and contribute towards building a larger skilled workforce.

We would like the Climate Action Plan to be explicit about promoting skilled installation of high performance heat pumps. The narrative in the CAP should explain the benefits of doing so, and the policies embedded in the plan should commit the county to employing best practices when electrifying its own buildings, including using high efficiency heat pumps with low ghg potential refrigerants and ensuring that all retrofit work on County buildings is covered by a Community Workforce Agreement with the local Building Trades to ensure skilled installation.

Greening the Grid

According to the Bay Area Air Quality Management District (see the EIR for Rules 9-4 and 9-6), most of the renewable generation needed to offset the new electrical demand created by these rules will need to come from utility scale projects. We would like to emphasize that the most promising strategy would be to pursue a strong combination of both distributed and utility scale generation and storage.

Not all our utility scale energy has to be sourced from within the county, but if most new capacity is sourced from outside the county and much of it from hundreds of miles away in places like the California desert, that is not necessarily the best result for conservation. Moreover, very long distance transmission means more transmission losses and vulnerability to transmission interruption. Power outages have already cost the Bay Area economy hundreds of millions of dollars and the likelihood is that there will be more of this to come. Given the high cost of outages and the increasing vulnerability to outages created by climate change, we think more attention to this issue is due.

Our view is that producing more new renewable close to home should be a priority and cities and counties need to work together to ensure that we get both the distributed and utility scale projects that we need. Incorporated cities harbor most of the opportunities for new distributed energy resources, while the County has jurisdiction over most of the potential sites for utility scale projects. If more counties would shoulder more responsibility for siting new utility scale renewable power, our state would more quickly reach net zero, our grid would be more reliable and the disproportionate pressure on select counties in the desert would be lessened.

In theory, the County's draft CAP and General Plan do provide for growth of both distributed and utility scale renewable generation. But the county's policies don't appear aligned with the goal of retaining leadership. Utility scale solar, for instance, is barred from most of the County controlled land. This is consistent with a disturbing trend among counties across the nation, and it is a serious threat to the climate. We understand the interest in keeping solar development out of truly pristine areas. But the current map excludes solar from areas that already have industrial wind development, and that is hard to justify.

A recently proposed utility scale solar project proposed in Contra Costa County was located near Byron where it would have been collocated with an existing industrial wind project nearly underneath the transmission lines on a parcel with good road access for construction and maintenance. It was turned down because it wasn't in the County's too limited Solar Combining District. Among the factors cited was the slope of the land.

There are legitimate issues associated with building on slopes. Poor techniques can lead to considerable erosion, which means not just loss of soil, but increased sediment loads in streams. However, with care (and skilled construction labor), these issues can be mitigated in many instances. The industry is rapidly improving its ability to do so. New approaches are reducing the ground level footprint of ground mounted solar panels far below what was possible just ten years ago. Today's ground mounted solar projects can compare favorably with wind projects.

Some sloped areas have habitat values that are important to consider. In Eastern Contra Costa County, there is a robust institutional process for doing so. The best practice is to follow the directives of the East Contra Costa County Habitat Conservation Plan / Natural Community Conservation Plan (HCP/NCCP or Plan). This is the approach the County uses to mitigate habitat issues in the existing Solar Combining District. We think that same approach should apply to some parcels with slopes that are currently excluded from the Solar Combining District.

Solar projects following the directives of the habitat plan could provide a double benefit to the cause of species conservation. Reducing climate change is itself a benefit to species conservation, and fees from these projects could help contribute to the land conservation goals of the HCP/NCCP.

Our recommendation is to modify the map to allow solar on more areas close to transmission contingent on project level analysis and mitigation. A revised solar siting policy in the general plan should expand the area covered by the Solar Combining District and should be structured with a Conditional Use Permit specifying criteria for approval including mitigation of environmental impacts, meeting agrivoltaics criteria if applicable, and workforce development commitments.

Green Use of Grey Water

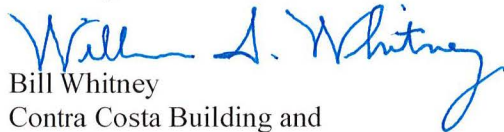
The last piece of advice we have regards a smart green building practice from the Climate Action Plan that would be a good candidate for additional action. Installing purple pipe to address needs that otherwise would be satisfied only by using potable water can provide economic climate mitigation, a

significant boost to resiliency and additional plumbing work that is always welcome. The current Climate Plan has made purple piping allowable for landscape applications, which is definitely welcome, but hasn't considered the potential to require purple piping in some instances. We would also note that, in addition to serving landscape needs, purple piping can be used in some indoor applications too, such as flushing toilets. We recommend that the County explore the potential of purple piping to meet a variety of end use applications and to establish reach codes that require purple piping where appropriate.

Conclusion

Contra Costa County's new general plan offers an opportunity to create high road green jobs, reduce climate emissions, improve resiliency, and make real progress towards addressing the housing crisis. The revisions that we have suggested to the County's draft plans are aimed at strengthening progress towards these goals. We look forward to working with the County staff to help make the plan something we all can be proud of.

Sincerely,



Bill Whitney
Contra Costa Building and
Construction Trades Council

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Comments on CCC Conservation, Open Space and Working Lands Element
Date: Monday, March 18, 2024 8:43:54 AM

From: Courtney Coon <ccoony@gmail.com>
Sent: Monday, March 18, 2024 8:43:43 AM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: Comments on CCC Conservation, Open Space and Working Lands Element

You don't often get email from ccoon@gmail.com. [Learn why this is important](#)

Hello,

I am a resident of Pleasant Hill. My comment is in regards to Chapter 7 of Contra Costa County's Conservation, Open Space and Working Lands Element.

First of all, I would like to thank the staff for its commitment to calling for an oil drilling ban and phase out. I would love to the additional step of putting in place a full moratorium to prevent permit approvals while the ordinance is in development.

Secondly, I appreciate the document's acknowledgement of the health and safety dangers of oil and gas drilling, but I would like to see even stronger protection in place such as a full ban on drilling. Current research shows that a 3,200-foot setback from drilling sites is too close to the minimum required distances that could reduce the harmful health and quality of life impacts from emissions and other exposures. The most health-protective approach is actually no drilling at all!

Thirdly, I would request that the document also include a requirement for regular, periodic monitoring of methane and other dangerous emissions at existing oil and gas infrastructure.

Thank you for your consideration.

Courtney Coon, PhD
she/her



March 25th, 2024

To:

Chair of the Board of Supervisors, Supervisor Federal Glover, Vice Chair Candace Andersen, Supervisors John Gioia, Ken Carlson and Diane Burgis.

Will Nelson, Principal Planner and John Kopchik, Director Department of Conservation & Development.

Sustainability Commission Members via Luz Gomez, Contra Costa Sustainability Commission Chair, and Demian Hardman-Saldana, Department of Conservation & Development.

CC:

Jody London and Adam Scarbrough, Department of Conservation and Development

Comments on Contra Costa County 2045 General Plan

Introduction

We appreciate the opportunity provided to offer suggestions and input on the Draft General Plan. Many who contributed to this letter have been engaged in the General Plan update process since it began. We commend the thoroughness and work that went into this plan, including the attention to each community profile and the themes that you've identified to guide the plan's update. We also acknowledge and appreciate that the plan, through many measures, seeks to build resilience in the face of hazards amplified by global heating and environmental pollution. We also recognize the many ways in which the plan seeks to move the County forward in step with the clean energy transition and the health, social, environmental and economic benefits that this can deliver.

It is our understanding that an implementation plan will be created. We feel this is an essential step in realizing changes embedded in the General Plan, and we look forward to reviewing it. It is also important that the General Plan is aligned with the CAP in terms of measurable GHG reduction targets.

What follows are many suggestions and comments on the plan based on the careful reading of it by many members in the groups signing on to this letter. We look forward to the opportunity to discuss key points and receive feedback from County staff on these suggestions.

In Contra Costa County in 2045 (prior to Table of Contents)

Point 4 of the Vision Statement

Strike "growing" from the 4th point, so that it reads: "All communities benefit equitably from an environmentally sustainable and just economy," rather than "All communities benefit equitably from a growing economy that is sustainable and just." The expectation of constant economic growth and its compatibility with resource-preservation is contested by proponents of a circular economy,

endorsed throughout these documents. It seems misleading to propose endless economic growth in the Overview / Vision Statement.

Chapter 3: Stronger Communities Element

Section: Environmental Justice

SC-P1.1 and SC-A1.1 (p. 3-5 and 3-6)

We applaud the aspirational action (SC-A1.1) to “support transition from petroleum refining and other highly polluting industries to a net-zero emission economy based on renewable and sustainable industries that provide living-wage jobs.” However, the absence of any timeline weakens this statement of intent. Given environmental justice and climate urgencies, it needs to be clearly stated that this transition will be completed by 2045.

Additionally, every effort should be made to ensure that any replacements for fossil fuel production and refining are truly renewable and sustainable, and that County policy keeps pace with rapidly evolving scientific understanding.

In regard to the above, the County, following the lead of state Low Carbon Fuel Standard (LCFS) policy, recently approved two refinery conversions to biorefining. However, that policy is currently undergoing revision in response to critical feedback from scientists, academics, and environmental justice advocates. (CARB will decide on its new policy in July.) The Union of Concerned Scientists, for example, is calling for a cap on vegetable oil-based fuels, as well as other LCFS reforms.

(<https://blog.ucsusa.org/jeremy-martin/a-cap-on-vegetable-oil-based-fuels-will-stabilize-and-strengthen-californias-low-carbon-fuel-standard/>).

Unfortunately, no guardrails were put in place around Contra Costa renewable diesel production, such as periodic reevaluation of permits. There must be mechanisms in place to ensure that projects, once permitted, can be brought into alignment with new findings about any unanticipated environmental harms or public health impacts.

SC-A1.1 – A1.3 (p. 3-6)

Health harm is done by the refining of *any* liquid transportation fuel, whether plant- or petroleum-based. This [study](#) finds that “respiratory ER visit rates among residents living within 10 km of biorefineries were significantly higher” than outside the 10 km zone, and that refining corn and soy-derived feedstock was the most negatively impactful (<https://pubmed.ncbi.nlm.nih.gov/34232029/>).

The County must ensure that projects within any proposed Impacted Communities Overlay Zone “positively impact health and quality of life,” as stated in [A1.3 \(e\)](#). This would mean disallowing new projects with unavoidable significant environmental and health impacts, and any repurposing of existing industrial facilities with unavoidable significant environmental and health impacts, in and near the county’s Impacted Communities. Given the study cited above, “near” might be defined as a distance of *at least* 10 km (6 miles), although refinery pollutants are known to travel far greater distances than that.

SC-P-1.2 (p. 3-5)

“Streamline the permitting process for new development, redevelopment, and rehabilitation that promotes community objectives in Impacted Communities, as identified in the Community Profiles.”

Promoting community objectives must not bypass or weaken key provisions of CEQA. The law has already been modified to expedite high-priority development (such as infill housing) and infrastructure projects. Pollution and poverty-impacted communities will likely suffer with any further weakening of CEQA protections. Perhaps this recommendation should be removed altogether.

SC-P1.3 (p. 3-5)

Change to: Support creation of walkable districts by facilitating development of high-density, neighborhood-serving retail and service uses, public amenities, and related infrastructure (such as lighting) for residents of Impacted Communities, within walking distance of their homes.

SC-A1.2 (p. 3-6)

“Amend County Ordinance Code Chapter 84-63, Land Use Permits for Development Projects Involving Hazardous Waste or Hazardous Materials, to: (a) Increase the hazard scores for projects with potential to adversely affect Impacted Communities to ensure more projects are subject to discretionary review....”

Add: Establish a mechanism whereby community members can make recommendations to the County about updating and strengthening the existing Industrial Safety Ordinance *in its entirety*.

SC-A1.7 (p. 3-6)

“Upon each 5-year review of the General Plan, review health outcomes data for Impacted Communities and assess any updated information related to the delineation of Impacted Communities in Contra Costa County.”

Add: In addition, with each 5-year review, County Health Services must review health outcomes data to determine the impacts of newly permitted projects and repurposed facilities. As health data becomes available, General Plan amendments may be considered sooner than five years.

Section: Community Health - Healthy Neighborhoods (3-7)

SCP 2.1 (p. 3-11)

Change: “welcome,” which is vague, and use “actively work toward” instead.

This section mentions healthy air quality, but does not include any policies and actions in that regard. Perhaps this section should reference the Environmental Justice section of the Healthy Communities section, and the Transportation Element, for policies and actions to reduce air pollution. (Air quality is addressed in safety element.)

Section: Community Health - Access to Health Services (3-12)

Section: Healthy Homes (3-16)

Suggested: This section should state a policy, and action, to replace natural gas with electric appliances to improve both home and community safety.

Natural gas cooking appliances should be noted as being hazardous, due to both their toxic emissions and the explosivity of natural gas infrastructure. While SC-A6.2 outlines a program to lower the cost and encourage the adoption of energy-efficient electric appliances, this section should state a policy, and action, to replace natural gas with electric appliances to improve both home and community safety.

Section: Economic Empowerment-Workforce Development

SC-A-8.2 (p. 3-24)

“...[S]upport a just transition from a fossil-fuel reliant economy by training displaced workers with skills for living-wage jobs in new industries.”

Revised language: “...for living-wage jobs in new, environmentally sustainable industries that are not ancillary to, or prolong the existence of, the fossil fuel industry.”

Section: Economic Empowerment - Business and Innovation

SC-A9.3 (p. 3-27)

“Evaluate commercial and industrial regulations and permitting practices on an ongoing basis to ensure that they: (a) Address contemporary uses and activities. b) Promote compatibility between new and legacy uses. (c) Avoid creating unnecessary barriers that hinder economic expansion, investment, and sustainable growth.”

Proposed language change: Strike (b). “Legacy uses” include the fossil fuel industry, which the plan actually seeks to phase out. And in (c), strike “economic expansion.” This leaves the emphasis purely on “sustainable growth.” Also, add a stipulation that regulations and permitting practices “are sufficiently protective of public health.”

Section: Community Profiles

BayPoint / Planned Land Use.

The plan calls for creating three higher-density mixed use nodes, which is commendable. However, the plan falls short in not quantifying the residential density goals necessary for encouraging the requisite neighborhood population density that would support the creation of neighborhood-serving shops and cultural facilities, and to make public transit more practical, necessary elements of neighborhood districts that are convenient to get around in by active transportation and public transportation.

Pacheco – Impacted Community

“residents in Pacheco face health risks associated with poor air quality.”

Add Policy and Action: To make a timely transition to use of unleaded aviation fuel.

Comment - Stating that Pacheco residents face health risks associated with poor air quality totally disregards one of their real health concerns, harm from lead contamination. Their homes are being dusted repeatedly by lead tainted exhaust from aircraft using leaded aviation fuel.

<https://ceh.org/air-and-water/avgas-map-californians-affected-by-lead-from-aviation-fuel/>

The county could stop the sale of this toxic fuel and ensure the use of an unleaded version of aviation fuel, just like Santa Clara County has done.

Chapter 4: Land-Use Element

Section: Orderly, Well-Planned Growth - Changes to the Urban Limit Line. (p.4-14)

Update the date on the statement: “The BOS will review the boundary of the ULL in the year 2016” as these provisions are effective until Dec. 31, 2026.

LU - A1.2 (4-15)

Consider a more specific word than “periodically” update Co. Ordinance Code Title 7.

Section: Specific Land Uses

LU-7

Add Policy: For new developments on arterial streets where the ground level street frontage will be substantially retail, service, and cultural facilities, eliminate maximum building size and dwelling unit quantity limits for multi-family housing. Instead, create zoning requirements that impose reasonable buffers between the new development and adjacent existing residential properties.

LU-P9.1 (4-28)

“Welcome industries that create living-wage jobs and career advancement opportunities for county residents while minimizing environmental degradation.”

Add: “[while minimizing environmental degradation], safety hazards, pollution exposure, and adverse public health impacts.” Instead of “welcome,” use “actively seek out.”

LU-A9.3 (4-29)

“Amend the County Ordinance Code and/or procedures to streamline the permitting process for businesses and industries that provide living-wage jobs, invest in the community, hire from the local workforce, and embrace sustainability.”

Add: “[and embrace environmental sustainability], while maintaining CEQA compliance.”

Transparency and integrity in public decision-making should not be abandoned in the pursuit of equity and environmental sustainability.

Chapter 5: Transportation Element

Section: Safe and Sustainable Transportation (p.5-2)

The plan’s emphasis on active transportation and public transportation is to be commended.

Suggested change: Include information in this paragraph indicating that as of July 1, 2020, the State, by adopting Senate Bill 743, has officially moved all jurisdictions from the LOS (Level of service) metric to the VMT (Vehicle Miles Traveled) metric for assessing and analyzing traffic impacts of land use and transportation projects. This is a major change that is now adopted law. Reducing VMT is now the *only* way that

Contra Costa County or any jurisdiction is moving into the future.

<https://mtc.ca.gov/planning/transportation/driving-congestion-environment/sb-743-los-vmt-transition>

Include in this discussion: There are multiple ways to encourage people to reduce using motor vehicles for personal transportation: (a) making it more expensive, (b) making it less convenient, (c) making alternatives more convenient, and (d) creating more higher density mixed use communities— where active transportation access to shops, offices, cultural activities, and public transit becomes more practical.

Add New Goal, Policy and Actions

Suggested Goal: Encourage residents to ride bicycles, including electric mobility devices, for transportation and recreation by creating a complete network of bicycle facilities on all County arterial and collector streets.

Suggested Policy: Follow the most current adopted version of the Highway Design Manual, including any Design Information Bulletins that are awaiting adoption.

Suggested Actions:

Install Class II bicycle lanes on each side of every Route of Regional Importance in the entire County. An acceptable alternative would be to install a Class IV bicycle path on one side of the Route of Regional Importance. If the Class IV option is pursued, there must be a traffic signal at each end of the path so that the bicyclist can easily switch from the bike lane to the bike path and vice versa.

Where the Route of Regional Importance is on a freeway, the bike facilities as described above will be installed on a closely parallel arterial street.

When an arterial or collector street or road receives sufficient major maintenance (resurface, overlay, slurry seal, etc.) to require the restriping of the traffic lanes, all bike lanes will be painted so that they extend all the way to the limit line of every intersection.

All intersections that contain any dedicated right-turn lanes must include a dedicated bike lane between dedicated right-turn lane and dedicated through lane. Given that the space between the curb faces is limited, narrowing all lanes by the same percentage will be an acceptable compromise.

Be sure that all traffic-signal sensing-loops or devices include markings indicating where the bicyclist needs to wait in order to trigger the signal. This includes dedicated left-turn

lanes. Pending the street undergoing major maintenance and the inclusion of a bike lane up to the limit line, such markings will be installed in the rightmost through traffic lane.

Include crosswalks in all four quadrants of every signalized intersection.

Retrofit to include a pedestrian "beg" button that triggers the traffic signal on every traffic signal pole without regard to the presence or absence of painted crosswalks, pedestrian "walk" signals, or sidewalks.

Install and maintain bike lanes on Pacheco Boulevard, paying particular attention to the best possible passage under the historic railroad overpass on Pacheco Boulevard."

TR-P1.1 (p. 5-5)

Rewrite this policy. Remove any mention of exceptions to LOS. Remove any mention to LOS. LOS should no longer be used by the County for analyzing traffic impacts. Reducing VMT is now the State-wide metric required by law for assessing and analyzing traffic impacts of transportation projects; Contra Costa County is required to use VMT.

TR-P1.12, (5-6)

Add: The county will amend its building code to require EV charging for each dwelling in new multi-family projects effective by 2025, and encourage the installation of charging at existing multi-family housing with financial incentives. It should also make project permitting easier.

Regarding the transition of private ICE motor vehicles to EVs, the plan only mentions adding charging infrastructure at new developments. EVs have been mass-produced for over a dozen years now. These earlier models provide relatively inexpensive entry to driving electric vehicles; however, many of the early models do not have fast charging capability. Providing charging infrastructure at existing multi-family housing is vital for the practical charging of these earlier EVs. Also, charging at home is easier for all EV owners than having to stop at commercial charging stations, and can lower charging electricity costs. It appears that 2025 CalGreen will require EV charging capability for each new dwelling in new multi-family projects. However, this greatly expanded charging requirement will not take effect until 2026.

TR-P 1.2 (p. 5-5)

Add to the end of this sentence: "by requiring the installation of a bicycle lane along any street where the curb is replaced."

TR-P 1.4 (p. 5-5)

Adjust this policy to indicate that reducing VMT is the County's policy. Create an action item as needed to tell the County to adjust the Transportation Demand Management ordinance to reflect this.

TR-P 1.6 (p. 5-5)

Adjust the language in this policy to indicate that reducing VMT is now State law. This could be done by inserting language after Contra Costa County "by reducing VMT" and before "through the application of."

TR-P 1.13 (p. 5-6)

Add: "Opportunities to charge electric bicycles and other types of individual electric powered transport, aka micromobility, are included in the definition of ZEV charging/fueling infrastructure."

TR-A Add New Action

Include an action that requires the County to rewrite and update the County's Transportation Demand Management document to reflect the reduction of VMT as the County's metric for assessing and analyzing traffic impacts of transportation projects.

TR-A - Add New Action

Include an action that requires the County to rewrite and update the County's Transportation Analysis Guidelines to reflect the reduction of VMT as the County's metric for assessing and analyzing traffic impacts of transportation projects. Note: You may want to renumber these actions to reflect the numbering system that you are using throughout the document.

TR-A 1.1 (p. 5-6)

Include reference to both human-powered and electric bicycles in this policy. This could be done by inserting this language after "...not limited to "analog and electric bicycles," in front of "micro mobility, zero-carbon rideshare...."

TR-A 1.5 (p. 5-6)

Include: "bicycle lanes" and "sidewalks" specifically in the action item. This Action Item is too vague and should include an inventory of bike lanes and sidewalks within

one mile of the subject County offices and facilities and from public transit to these facilities, and the closing of any gaps as a priority.

TR-A 1.7 (p. 5-7)

Add: "bike racks and bike lockers" in the amenities parenthesis. So it reads "amenities (e.g., shelters, seating, bike racks and bike lockers)"

TR-A 1.11 (p. 5-7)

Include: "and electric bicycle" after ZEV... and before "...charging."

TR-A 1.12 (p. 5-7)

Add at the end of this item: "as well as personal EVs and electric bicycles."

TR-A 1.13 (p. 5-7)

Rephrase this action. Asking for money from others to pay for bike lanes, sidewalks and traffic signals is a great idea and should be encouraged, but the physical impacts of micro-mobility transportation are the bike lanes and sidewalks. The operational impacts of micro-mobility transportation are the traffic signals. The construction of both of these projects is called for elsewhere in this document. This entire chapter concerns providing and dividing up space on the road and encouraging people to use more of certain portions of it and less of other portions of it.

TR-P 2.3 (p. 5-8)

Change: Specifically call out that street lights be included wherever a separate bike path crosses a public street.

Note: The East Bay Regional Park District has a policy of not lighting its paths. EBRPD operates many paths along utility rights-of-way that cross public streets often.

Add Action: To implement this policy.

TR-A 2.3 (p. 5-8)

Include: "Sidewalks will be included on both sides of every at-grade railroad crossing."

TR-A 2.3 (p. 5-8)

Include: Underpasses built in the 1920s under railroads and that are very narrow according to our current roadway design guidelines will be widened to provide bicycle and pedestrian facilities.

Comment: Two that come to mind are the one in Franklin Canyon (at the foot of the hill from Cummings Skyway) and the one on Pacheco Boulevard (just west of Falling Star Boulevard). **Note:** Although divided and multi-lane, Highway 4 through Franklin

Canyon is not a freeway. It is not limited access, so it does not meet the Caltrans definition of freeway. Bicycles are permitted on the eastbound segment of Highway 4 between the Sycamore Avenue and the Cummings Skyway interchanges. Bicycles are permitted on the westbound side, too.

Section: Coordinated Planning (5-8)

Figure TR-2 Routes of Regional Significance (p. 5-10)

Correct: The SR 160 Corridor on the Antioch Bridge from Wilbur Avenue and to the north is NOT freeway. Bicycles and Pedestrians are permitted.

TR-A 3.1 (p. 5-11)

Add to action item: That complete streets concepts include bicycle lanes. Include "If the Route of Regional Significance is on a Limited Access Highway (freeway), include bike lanes on a nearby parallel arterial or collector street OR include a Class IV bicycle facility on the freeway right-of-way."

Note: There are three segments of freeway, of which Bikes East Bay is aware, that permit bicycles: Highway 4 between Willow Pass Road and Port Chicago Highway; Highway 4 between Sycamore Avenue and Cummings Skyway; Highway 24 between Camino Pablo and Fish Ranch Road.

TR-P 3.4 (p. 5-11)

Add: "Protected bicycle lanes must be swept as often as any street of similar type."

TR-P 3.5 (p. 5-11)

Add: Require secure bike parking rooms in all multi-tenant buildings that do not provide an enclosed garage for each separate housing unit. (i.e., townhomes, apartments, condominiums) **Note:** This policy would better be added to the Housing Chapter, but that portion of this General Plan was covered by a separate process.

TR-A 3.2 (p. 5-11)

Include: "designation of certain roads as toll roads" as part of this action item.

Section: Multimodal Roadway Network

TR-P 4.1 (p. 5-14)

Include: A statement that deals with conflicts between bicycle plans. Specifically, between the CCTA's adopted Countywide Bicycle and Pedestrian Plan and a jurisdiction's adopted bicycle plan. When such a conflict exists (i.e., the City's plan does

not call for bicycle lanes on a certain street, but CCTA's plan does), which plan will take precedent? Suggestion: the more conservative plan should. This policy should be a separate policy and logically would follow TR-P 4.1. We could call it TR-P 4.1.1 or we could follow the numbering sequence that you are using and renumber all the following policies.

TR-P 4.3 (p.5-14)

Add: "Build bike lanes and sidewalks up to limits of adjacent jurisdictions even if the adjacent jurisdiction does not currently have bike lanes or sidewalks along that segment of arterial or collector street."

TR-A 4.3 (p.5-15)

Remove: "parking" from this action item.

It is time that we acknowledge there is a limited amount of space available between the curb-faces of our public streets. Large chunks of this public property should no longer go to a single individual for private use.

TR-P 4.6 (p.5-15)

Suggestion: Consider inclusion of on street parking as well.

TR-A 4.1 (p.5-15)

Add: "but at least every _ years". In addition to on an as-needed basis.

Section: Active Transportation (p. 5-19)

"Class I bikeways (bike paths) provide completely separate facilities from automobiles and are designated for the exclusive use of bicyclists and pedestrians with minimal cross-flow automobile traffic. In Contra Costa County, these types of paths are often along creeks, canals, and former rail lines. Class I bikeways are often used for recreational and commute trips."

Add: "utility corridors" so this reads "...these types of paths are often along creeks, canals, utility corridors, and former rail lines."

Suggestion: Reduce the use of Class III bicycle lanes as much as possible.

Comment: Bicyclists hate Class III bike routes. The copy has a very nicely written description of what perfection would look like, but the reality is that traffic engineers routinely put "sharrows" on 40+ MPH arterial streets and invite the bicyclist to strap a

piece of Styrofoam on their head and go out and fight it out with motorists who are paying more attention to their cell phones than they are to their driving.

TR-P 5.4 (p. 5-20)

Delete: “where feasible” from this policy.

TR-P 5.5 (p. 5-20)

Add Action: for the County “to obtain and use or contract for use of specialized equipment, such as ATV blowers used by EBRPD, to meet street cleaning needs of smaller bike lanes bordered by bollards.”

TR-P 5.10 (p. 5-20)

Include: (1) Electrical outlets for the charging of electric bikes and scooters should be included in some reasonable minimum of these parking places, and (2) bicycle lockers be provided. (3) Also, bicycle racks must be sufficiently widely spaced so that cargo bikes and bicycle cargo trailers (in addition to racing bicycles) can fit between the racks; and some of the lockers should be sufficiently large to fit cargo bicycles.

TR-A 5.1 (p. 5-21)

Include: "This project may mean that some vehicle traffic lanes may need to be narrowed, parking may need to be adjusted or eliminated, and a vehicle traffic lane occasionally may need to be eliminated."

TR-A 5.5 (p. 5-21)

Eliminate: “consider.”

Section: Air Mobility (p. 5-24)

TR-P7.2 (p.5-25)

“Work with the FAA and aircraft operators to minimize conflicts with residential areas and sensitive receptors.”

Suggested Action: Remove Leaded Aviation Fuel within 3 years. (Santa Clara County has done this.)

Chapter 7: Conservation, Open Space, and Working Lands Element

COS-A14.1 (p.7-43)

(a) “Prohibit new and expanded oil and gas production wells in the following:

(a)iii “Areas within 3,200 feet of sensitive receptors or urban land use designations....”

We appreciate this implicit acknowledgement of the health and safety dangers associated with proximity to oil and gas drilling, but would like to see even stronger protection in place.

Current research shows that a 3,200-foot setback from drilling sites is actually on the *lower* end of the range of distances that could reduce the harmful health and quality of life impacts from toxic emissions and exposures. A 2021 [Stanford study](#) found negative health impacts within a 2.5 mile radius from oil and gas facilities. [2.5 miles = 13,200 ft.] The [state investigatory panel](#) that declared 3,200’ setbacks the minimum protective distance also found that the most health-protective approach is no drilling at all.

Moreover, HS-P1.4 “[requires] new industrial development to locate significant pollution sources as far away from sensitive receptors as possible.” To achieve internal consistency within the General Plan, and to promote maximal health and safety protection, drilling setback requirements in COS-A14.1 should be made to align with this principle.

(b) “Restrict oil and gas drilling operations to agricultural zoning district only.”

Suggested Action: Remove (b). Rationale: Oil and gas drilling in agriculturally-zoned lands contradicts the goal stated in COS-P2.8 “to increase, enhance, and protect agricultural land and its production capabilities.” It also undermines the “County’s agricultural preservation goals” referenced in COS-A2.3.

If agriculturally-zoned land is to be used for *any* purpose other than agricultural-related, that activity should be limited to renewable energy production known to be compatible with agriculture. One example of this is the planting of shade-tolerant crops under solar installations.

(e) Include performance standards related to water quality, air quality, odors, noise and aesthetics.

Suggested wording: Performance standards relating to water quality should explicitly include impacts on groundwater aquifers, including groundwater levels, which would be consistent with COS-P8.1: “Protect public water supplies by denying applications for projects that would introduce significant new pollution sources in groundwater basins and watersheds feeding major reservoirs.”

(f) Add an additional requirement for the regular, periodic monitoring of methane and other dangerous emissions by County Hazardous Materials staff. Current oil and gas production in the County is woefully under-monitored by state regulators (CalGEM field inspection is severely understaffed), leaving Contra Costa residents at risk. This would be consistent with HS-A2.2, which calls for “data collection, monitoring of pollution exposure, and identification and implementation of solutions in Impacted Communities.” The monitoring needed near oil and gas infrastructure would necessarily extend beyond listed AB 617 communities.

Finally, we applaud the commitment to develop a “feasibility study” and a new land use ordinance that would amend the County Ordinance Code to prohibit development of new oil and gas wells and phase out existing oil and gas well operations. We note the alignment here with SC-A2.1, which proposes studying “the feasibility of implementing an amortization process to eliminate non-conforming land uses.”

It is our understanding that this process would begin after approval of the General Plan by the Board of Supervisors, which is likely to occur in late summer 2024. The study and ordinance development could reasonably take a year or more beyond that.

We therefore propose an urgency moratorium during this time to prevent any more permit approvals while the new ordinance is in process. Communities adjacent to Contra Costa oil fields must be fully protected while new policy is developed. And, in conformance with the County’s Declaration of a Climate Emergency, climate-protective actions which reduce GHG emissions must not be delayed.

Conservation, Open Space and Working Lands Element Performance Measures (p. 7-46)

Add: the following measure for review every five years:

Increased quantity of renewable energy sources, including wind power generation systems and solar energy facilities, along with microgrids, battery energy storage systems, and associated technologies.

Chapter 8: Public Facilities and Services Element

Section: Just and Equitable Facilities and Services

PFS-A2.3 (p. 8-6)

Suggest changing to: Implement and maintain urban greening and green infrastructure, such as sustainable/green street projects, in Impacted Communities.

PFS-A2.4 (p. 8-6)

Suggest changing to: Regularly assess Code Enforcement responses and Public Works maintenance practices to ensure equitable implementation. Prioritize resources to keep Impacted Communities safe and clean, emphasizing enforcement actions on issues identified in Community Profiles

PFS-A2.6 (p. 8-6)

Suggest changing to: Pursue public-private partnerships that will improve access to reliable, fast internet and make digital resources available in Impacted Communities at affordable prices.

Chapter 9: Health and Safety Element

Section: Air Quality

HS-P1.2 (p. 9-4)

As written: “Participate in emission and exposure reduction, public education . . . and other programs that promote improved air quality, focusing on impacted Communities.”

Strengthen language: Change “participate in” to “prioritize.”

HS-P1.3 (p. 9-4)

It’s not clear where to find the information indicated by the asterisk (and subsequent asterisks).

HS-P1.4 (p. 9-4)

“Require new industrial development to locate significant pollution sources as far away from sensitive receptors as possible.”

Better: “at the maximum distance possible from sensitive receptors.”

HS-P1.6 (p. 9-4)

“Require that any mitigation of air quality impacts occur on-site to the extent feasible to provide the greatest benefit to local residents. For mitigation that relies on offsets, require that the offsets be obtained from sources as near to the project site as possible. If the project site is within or adjacent to an Impacted Community, require that offsets/mitigation be located within that community unless determined infeasible by the County.*”

Without explanatory material—where exactly is the information to which the asterisk refers?— it is very hard to understand this requirement. Offsets are not even defined in the Glossary, and absolutely should be. Does this possibly reference BAAQMD’s Regulation 2, Rule 2, and the Air District’s emissions offset program? The rule applies to major-NSR (New Source Review) projects which produce precursor organic compounds (POC), oxides of nitrogen (NOX), and PM2.5, all with adverse health impacts.

We strongly agree that direct reduction of emissions at the source should always be prioritized, and hope not see *any* approval of projects that would require mitigation from offsets. This would be consistent with SC-A1.3 (e).

Perhaps the County can clarify where in its jurisdiction offsets are currently used and how they might be employed in the future?

To be consistent with EJ commitments, it is essential that no pollution trade-off causes any Impacted Community to experience “offset” pollution.

Section: Air Quality in Impacted Communities

HS-P1.10 (p. 9-5)

“Support efforts to provide HVAC upgrades and portable clean air filters to persons who live in Impacted Communities and other areas burdened by disproportionate exposure to poor air quality.”

Add: Provide air filtration in schools that are in close proximity to industrial facilities.

HS-A2.1 (p. 9-8)

“Partner with community members and regulatory agencies to prepare a community-scale plan for reducing and mitigating air pollutant emissions and industrial hazards, such as pipeline risks, accidents, potential water or soil contamination, and impacts to sensitive ecological resources for each Impacted Community, or group of Impacted Communities, as appropriate.”

Add: monitoring and data collection to the community-scale plan, as in HS-A2.2.

HS-A2.3 (p. 9-8)

“Conduct a housing condition survey in Impacted Communities to identify units likely requiring upgrades to provide adequate protection from toxic releases. Based on the survey’s findings, target outreach to provide information about weatherization and similar improvement programs.”

Add: Additionally, in Impacted Communities where housing is owned and managed by the County, conduct Health Impact Assessments on an annual basis, and evaluate the feasibility of relocating residents living directly on the fenceline of heavily polluting facilities.

Section: Greenhouse Gases

Greenhouse Gases Description

“To support its GHG emissions reduction goals, [and State climate goals], the County strives for net-carbon neutrality through a [gradual] transition to renewable and carbon-free fuels....”

Add the bracketed reference to State goals, and substitute “timely” or “expeditious” for “gradual.”

HS-A3.1 (p. 9-10)

Regarding (d): GHG reduction measures and strategies with quantifiable outcomes

Add: “including measurable goals or policies that track actual emissions reductions achieved, such as amount of waste diverted or number of buildings converted to electric appliances.

Regarding (f): The implementation and monitoring program needs to include reporting at least annually. The reporting also needs to be easy for the public to access, so that county residents can be updated and adequately prepared to participate in future plan revisions. Some type of a dashboard like that used by San Jose is recommended to track measurable goals around work and progress to date.

Section: Climate Change, Resilience, and Adaption

HS-P4.3 (p. 9-13)

“Discourage new below-market-rate housing in High and Very High Fire Hazard Severity Zones, the Wildland-Urban Interface, and Alquist-Priolo Fault Zones. If below-market-rate housing must be constructed within these zones, require it to be hardened or make use of nature-based solutions to ensure it remains habitable to the greatest extent possible.”

Comment: This should apply to all new housing. Catastrophic wildfire threatens everyone in its path, regardless of race or class, and any new housing in fire-prone areas potentially impacts all surrounding communities.

HS-P4.6 (p. 9-13)

“In hazard-prone areas, such as slopes exceeding 15 percent, mapped floodplains, High and Very High Fire Hazard Severity Zones, and Alquist-Priolo Earthquake Fault Zones, allow for decreased residential density, including below the minimum density requirement for the applicable land use designation, as the severity of risk increases.*”

Substitute “encourage” for “allow.”

Section: Sea level rise

HS-P6.3 (p. 9-26)

“Require new industrial development in areas subject to sea-level rise, emergent groundwater flooding, or tsunami inundation to provide plans for prevention and remediation of any contaminant releases induced by these hazards, along with bonds that guarantee remediation plans are implemented. Remediation should meet standards that protect people and the environment in the event of future permanent inundation.”

Comment: This requirement should also apply to existing industrial facilities. (Perhaps it could be better incorporated into HS-P9.5).

Section: Management of Hazardous Materials and Hazardous Waste.

HS-P9.5 (p.9-42)

“Require facilities that manage hazardous materials or hazardous waste in stationary or fixed storage tanks and that are in areas at risk of inundation from sea-level rise and flooding to conduct sea-level rise studies to address the risk of hazardous materials release from rising water levels, including rising groundwater. Require these facilities to incorporate best management practices to reduce the risk of release.”

Additionally, facilities should “provide plans for prevention and remediation of any contaminant releases . . . along with bonds that guarantee remediation plans are implemented,” per HS-P6.3.

HS-P9.9 (p. 9-43)

Change: “discourage,” “prohibit.”

Thank you again for the opportunity to offer these comments and suggested language changes. We look forward to discussing key points with you and getting your feedback on the items in this letter.

Signed by:

Shoshana Wechsler, Sunflower Alliance

Marti Roach and Lisa Jackson, 350 Contra Costa Action.

Arthur Bart-Williams, Grid Alternatives Bay Area

Bruce Ohlson, Bike East Bay

Lynda Deschambault, Contra Costa County Climate Leaders

Victor Flores, Greenbelt Alliance

Bill Olson, Citizens Climate Lobby - Contra Costa Chapter

Denice A. Dennis, 1000 Grandmothers for Future Generations

Jan Warren, Chair, Interfaith Climate Action Network

Benisa Berry, Center for Human Development and East County Community Leaders Network

Fred Bialy, Climate Reality Bay Area, Contra Costa County Policy Action Squad

Martha Kreeger, Sierra Club, SF Bay Chapter

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: 190 Alderwood Road in Walnut Creek
Date: Monday, March 25, 2024 1:26:11 PM

From: Kevin Burke <kevin@burke.dev>
Sent: Monday, March 25, 2024 1:25:55 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>; ken.carlson@bos.cccounty.us <ken.carlson@bos.cccounty.us>; Colleen Awad <colleen.awad@bos.cccounty.us>
Subject: 190 Alderwood Road in Walnut Creek

You don't often get email from kevin@burke.dev. [Learn why this is important](#)

This property is on the market - 1.3 acres, on the same block as apartments, and across the creek from more apartments. **Would it be possible to get a higher base zoning here than 7 homes per acre, for example townhome density (17 homes/acre?)** This might encourage reinvestment into a more productive land use, and help the County's social and environmental justice initiatives by contributing more sales and property tax revenue.

https://www.zillow.com/homedetails/190-Alderwood-Rd-Walnut-Creek-CA-94598/18387591_zpid/

Best,
Kevin Burke



March 25th, 2024

To:

Chair of the Board of Supervisors, Supervisor Federal Glover, Vice Chair Candace Andersen, Supervisors John Gioia, Ken Carlson and Diane Burgis.

Jody London and Adam Scarbrough, Department of Conservation and Development and Will Nelson, Principal Planner.

Sustainability Commission Members via Luz Gomez, Contra Costa Sustainability Commission Chair, and Demian Hardman-Saldana, Department of Conservation & Development.

LETTER OF COMMENT ON CONTRA COSTA COUNTY CLIMATE ACTION PLAN

In November, 2023, we were happy to receive the final draft version of the Contra Costa Climate Action Plan, released for public comment. Many of the groups signed onto this letter have been involved with the development of the Climate Action Plan since the CAP update process started mid-2019.

This letter provides some overview comments and then offers suggested language changes for elements of the CAP that we believe can be strengthened to better reflect urgency, clarity and accountability.

GENERAL COMMENTS AND OBSERVATIONS

POSITIVES THAT STOOD OUT

We appreciate the comprehensiveness of this plan and recognize the hard work that went into it. What stood out:

1. Interweaving plans and actions between the General Plan and Climate Action Plan..
2. Most of the introductory narrative sections are very good and can be useful to educate the general public.
3. Explicit commitment to secure necessary funding to implement the CAP.
4. Indication of interest in moving toward requirement in staff and Board actions for disclosure of climate and equity effects. (L-2 Actions Point 3).
5. Commitment to do an annual report.

SUBSTANTIVE ISSUES GAPS

Section - The 2024 CAP and Carbon Neutrality (page 104)

We have a number of concerns and recommendations:

1)The stated possible inability to reach GHG reduction targets in line with the state by 2045 with tools available now. We feel that more effort can be put into moving aggressively on GHG emissions reductions in buildings, waste and transportation in order to close the gap in the plan. We do not think it wise to kick the can down the road and rely on hoped-for technological fixes.

2) Reliance on “uncertain” carbon sequestration for results. Referenced in the section on The CAP and Carbon Neutrality (p104) are uncertainties around carbon sequestration, storage and carbon offsets as means to reach reduction goals. Aside from natural sequestration, we strongly submit that industrial carbon capture and storage should not be considered as a possible future solution for GHG reduction in the County. It is expensive, unproven in its ability to actually reduce emissions and be scalable, and it takes away resources and focus from the promising strategies in renewable energy and energy efficiency. The CAP and General Plan should clearly rule out this option.

3) Using offsets is a false approach that only consigns our impacted communities to continued pollution based upon offsets that often cannot be proven to be truly a new reduction in carbon. The plan needs to prioritize direct GHG emission reductions that also improves air quality for the areas of the county with the worst cumulative air pollution.

Comment: ◦ Offsets are not defined in the Glossary.

COMMENTS: Please explain figures in Table 15, page 105. What is the 11% Other category? Are these emissions that are unable to be reduced? Is the MITCo2 7,070 the amount the plan cannot reduce as shown in the categories in Table 15? If so, what are the technical, economic and political barriers to reducing these further?

WAYS TO STRENGTHEN COMMITMENTS TO ACTION

1. **Section 4**, which outlines the efforts to reduce GHG emissions and resilience efforts, lacks performance result metrics in Goals, Strategy and Actions (with some exceptions.) We want to see desired results for 2030 and 2045. A key theme of many prior comments sent in by some signers has been the need for measurable efforts. We do note that Appendix B – Technical GHG Appendix offers performance targets which cover some elements of strategy and actions covered in Section 4 of the plan. Clearer and more overarching measurable results would convey desired results.

(Example: <https://www.sanjoseca.gov/home/showpublisheddocument/66591/637401786995170000>)

2. We strongly recommend enhancing accessibility for all readers by cross-referencing Chapter 4 and Chapter 5 Strategies, Chapter 6 2024 CAP Implementation Matrix, and Appendix B Key Assumptions and Performance Targets Sections. This would provide a comprehensive view of the plan's strategies and success measurement methods for all stakeholders.

Currently, GHG Reduction Strategies in Chapters 4 and 5 are listed separately in Chapter 6, which includes additional details like "Performance Metrics," "Potential Partners," "Applicability," and "Time Frame." Key assumptions and performance measures necessary for achieving projected GHG emissions reductions are located in Appendix B (Page 244 of the PDF document). This section details assumptions about community participation and quantifiable performance targets for success by 2030 and 2045. Both are crucial for evaluating strategy success, yet they're separated from key performance metrics in the Implementation Plan.

3. Performance targets in Appendix B are not clear as they do not show how the target figures are a percentage of the total. For example, the number of households with composting service should also tell us how this target is a percent of total households in unincorporated Contra Costa. This appears to be missing in all performance targets.

4. Much of the actions lack clear commitment. The plan has many modifiers when discussing action that create room for no commitment or accountability for an action to take place. For example, "Encourage", "If Feasible", "Consider" are common modifiers. "Evaluate options" is also used with no indication of identification of the best option, and actions to implement it.

5. We recommend that a public dashboard of the Strategies be created and updated regularly in line with the reports to the Sustainability Committee and Board to show measurable progress on actions that reduce emissions. This dashboard should be accessibly published on the county website, not just in reports in meeting agendas which are hard for the public to access and to track over time.

(Example: <https://www.sanjoseca.gov/your-government/departments-offices/environmental-services/climate-smart-san-jos/climate-smart-data-dashboard>)

RECOMMENDED LANGUAGE CHANGES

CLEAN AND EFFICIENT BUILT ENVIRONMENT P. 72

BE-1 Strategy Current Wording: Require and incentivize new buildings and additions built in unincorporated Contra Costa County to be low-carbon or carbon neutral.

COMMENT: In light of the Ninth Circuit Court's decision not to allow Berkeley to appeal its ruling, we encourage the County to explore all options to incentivize all electric new buildings

and hope to work with the Sustainability Committee and staff as options are explored and discussed. We appreciated the 2-28 email announcement from DCD affirming efforts to promote all electric new buildings.

Point 3 Existing Wording: Partner with community groups and MCE to establish an induction cooktop loaner program for county residents.

Comment: Suggestion that this action be moved to the BE-2 which addresses existing buildings.

Point 6 Existing Wording: Provide educational materials to encourage project applicants to incorporate passive solar design features into new developments and significant reconstructions.

Point 6 Suggested Wording: Provide educational materials to encourage project applicants to incorporate passive solar design features into new developments and significant **alterations and additions.**

Point 7 Existing Wording: Promote additional sustainable building strategies and designs, including small and “tiny” homes, to project applicants as site appropriate. Consider requiring additional sustainable features as a condition of approval, including reuse of materials to minimize embedded carbon.

Point 7 Suggested Wording: Promote additional sustainable building strategies and designs, including small and “tiny” homes, to project applicants as site appropriate. **Require** additional sustainable features as a condition of approval, including reuse of materials to minimize embedded carbon. **Create policies that require and or incentivize durability, reuse, remanufacturing, and recycling.**

BE-2 Strategy Current Wording: Retrofit existing buildings and facilities in the unincorporated county, and County infrastructure, to reduce energy use and convert to low-carbon or carbon-neutral fuels.

BE-2 Suggested wording: **Prioritizing equity, retrofit 40% of existing buildings and facilities in the unincorporated county, and county infrastructure to all electric heating systems by 2030, and 100% by 2045.**

BE-2 Action recommendations:

Comment: We assume many more explicit actions will be in the BE Roadmap such as pursuing zonal strategies with PG&E.

Point 2 Existing Wording: Require replacement and new water heater and space heating and cooling systems to be electric if the building electric panel has sufficient capacity in accordance with BAAQMD Regulation 9, Rule 4, and Regulation 9, Rule 6. (COS-P14.10)

Point 2 Suggested Wording: Provide educational and technical resources to advance the adoption of HPWH and HP space heating in buildings in support of BAAQMD Regulation 9, Rule 4, and Regulation 9, Rule 6, which will mandate that replacement and new water heaters (2027 and 2031) and space heaters (2029) are zero NOx. . (COS-P14.10)

COMMENT: The BAAQMD rules do not provide exceptions for electric panel capacity. There are many available panel capacity mitigation devices, including low cost solutions.

Point 3 Existing Wording: Create a detailed roadmap to convert existing homes and businesses to use low- or zero-carbon appliances. The roadmap should include steps to support converting buildings to rely on low- or zero- carbon energy using an equitable framework that minimizes the risk of displacement or significant disruptions to existing tenants. (COS-A14.7)

Point 3 Suggested Wording: Create **and implement** a detailed roadmap to convert existing homes and businesses that use gas heating systems to all-electric appliances. The roadmap should include steps to support the electrification of buildings using an equitable framework that minimizes the risk of displacement or significant disruptions to existing tenants. (COS-A14.7)

Point 4 Existing Wording: Evaluate options for incentivizing and requiring additions and alterations to be energy efficient and to achieve the lowest feasible levels of GHG emissions, including upgrades to the building electric panel as needed. (COS-A14.8)

Comment: The State building energy code is sufficiently stringent in terms of energy efficiency. Better energy code enforcement is what is needed to achieve buildings with greater energy efficiency.

Point 6 Existing Wording: Explore opportunities, in collaboration with partner agencies, to create new incentives or publicize existing ones to support updating existing buildings to achieve the lowest feasible levels of GHG emissions.

Point 6 Suggested Wording: **Identify and advance opportunities**, in collaboration with partner agencies, to create new incentives and publicize existing ones to support **the replacement of existing buildings' gas heating systems with electric heating systems.**

Point 7 Existing Wording: Work to continue to obtain funding with partners such as BayREN and MCE to implement a program or programs to provide reduced-cost or free energy-efficiency and zero-carbon retrofits to local small businesses and households earning less than the area median income, in support of the Contra Costa County Asthma Initiative, Contra Costa County Weatherization Program, similar County programs, other nonprofit partners, and other health equity efforts for Impacted Communities. Support the use of low-emitting materials, including paints and carpeting, in retrofits to improve indoor air quality.

COMMENT: This action is unclear. Is this about embracing and working to accomplish a whole homes or healthy homes approach to retrofitting in impacted and low income areas? (we support a whole home/healthy homes approach)

BE-3: Increase the amount of electricity used and generated from renewable sources in the county.

BE-3 Suggested wording: All buildings in unincorporated Contra Costa County will use energy generated by renewable sources by 2040.

BE-3 Action recommendations:

Point 6 Existing Wording: Encourage installation of battery storage systems in new and existing buildings, especially buildings with solar energy systems and buildings that provide essential community services. (COS-P14.7)

Point 6 Suggested wording: Working with partners, use education, policy and permitting changes, and promotion of economic incentives to increase solar and battery systems for 80% of residential, commercial and industrial buildings, prioritizing impacted communities by 2045. Solar and battery systems could be implemented at either the micro-grid level and/or for individual properties.

New Action: In partnership with MCE, proactively identify opportunities for industrial scale solar plus battery projects in unincorporated Contra Costa County to benefit impacted communities.

Technical GHG Appendix B Comments for Building Electrification

BE-1 COMMENT: Why are performance targets for commercial and residential buildings not at 100% by 2045?

BE-2 COMMENT: It is difficult to align the assumptions with the performance targets. Since the aim is to electrify as many buildings as fast as possible, clearer performance targets that identified type of building, quantity in place in the County, percent still using gas for some or all appliances and percent of the total number of these types of buildings that will be all electric. If the County does not embrace the goal of 100% of residential and nonresidential buildings being all-electric by 2045 (which is our ask), some additional performance targets on specific appliances would be helpful in order to measure the program goals versus the actual results.

BE-2 COMMENT: There are no performance measures for low carbon building materials and curricular economic reuse of materials.

BE-3 COMMENT It is difficult to align assumptions with performance targets.

BE-3 COMMENT: We assume performance targets tie into the specific efforts of the County in this plan; We do not understand how the residential energy provided by MCE is a County measure of success.

BE-3 COMMENT: Since we are advocating for 80% of buildings to have solar plus batteries by 2045, we would like to see performance measures that track this. It is confusing to us that there are zero new battery storage systems anticipated for 2045.

NO WASTE CONTRA COSTA (NW) P. 81

Goal Current Wording: Contra Costa County disposes of no more solid waste than 2.2 pounds per person per day (PPD)

Comment We like this measurable goal and it needs a date for achieving it.

NW-3: Action Recommendations.

New action: Reduction of refrigerants /disposal of equipment with refrigerants.

CLEAN TRANSPORTATION NETWORK P.91

Goal Current Wording: Contra Costa County's transportation network provides safe and accessible options for walking, biking and transit. If residents and workers are driving, they are in zero-emission vehicles.

Suggested Goal Wording: Reduce VMT by providing a county transportation network with safe and accessible options for walking, biking and transit. Residents and workers are driving less and are driving zero-emission vehicles.

TR-1 Action recommendations:

New action : By 2040, 132 miles of biking and walking lanes, prioritizing functional areas like neighborhoods over recreational areas, will be built, improving the viability of walking, biking, and zero emissions commuting in the County.

New Action: (between current 3rd and 4th points). Encourage CCTA, Jurisdictions, and the County to add continuous bike lanes on all designated Routes of Regional Significance in the County. Where these Routes of Regional Significance are on Freeways, add the bike lanes to public streets that closely parallel the freeway.

Point 4 Existing Wording: In collaboration with key partners, support efforts to establish or join a shared mobility program that provides access to conventional bicycles, e-bikes, and other micro mobility modes.

Point 4 Suggested Wording: In collaboration with key partners, support efforts to establish or join a shared mobility program that provides access to conventional bicycles, e-bikes, and other micro mobility modes, prioritizing access for low income residents who do not have bicycles. Establish bike repair programs.

New Action: Support CCTA, jurisdictions, the County, and regional transit agencies in providing "last mile" transportation connections and options, publicizing them, and encouraging their use.

TR-2 Action recommendations:

Point 3 Existing Wording: Provide incentives for zero-emission vehicles in partnership with MCE, BAAQMD, and other agencies.

Point 3 Suggested Wording: Educate and promote the access to incentives for zero-emission vehicles and chargers in partnership with MCE, BAAQMD, and other agencies, prioritizing low income residents.

New action: Work with owners of existing multi-unit properties, and other potential partners, to provide for the installation of plug-in vehicle charging stations in and near multifamily dwelling units. Consider financial incentives and the easing of permitting requirements.

New Action: Ban all new gas stations.

New Action: Encourage the installation of CD Fast Charging facilities, especially in close proximity to freeways.

Technical GHG Appendix B Comments for Transportation.

TR-2 Data Activity Savings Table

COMMENT: For the county fleet VMT stays the same (14260) - no reduction, just moved to EV. Should there not be an effort to reduce VMT overall?

COMMENT: Confusion between county employees and community - can metric state clearly when it is county employees vs. community.

TR-2 All tables.

COMMENTS:

This goal aims to transition vehicles to electric power. We would like more ambitious assumptions for adoption of all electric, especially for County vehicles and lawn and garden uses. It is our view that electric applications will move swiftly and enable adoption in all vehicle types. Here is an article on how even construction equipment is going electric. <https://electrek.co/2023/06/14/the-construction-industry-is-switching-to-electric-equipment-heres-why/#:~:text=From%20demolition%20and%20mining%20to.choice%20in%20the%20near%20future.>

Further, we would like to see avoidance of biomethane. The assumptions and performance targets show an increase. Is the County planning on using biomethane from County sources?

As mentioned in this article by the Union of Concerned Scientists, biomethane in transportation is laden with problems of supply and biomethane is much better used in developing batteries/other applications than in vehicle fuel.

<https://www.ucsusa.org/sites/default/files/attach/2017/05/Promises-and-limits-of-Biomethane-factsheet.pdf>.

We would like to see more bicycle lanes as a performance target for 2045 as we are asking for 132 bike lanes to be in place by 2040. (Since the State of California adopted The Complete Streets Act, every public street that is resurfaced/restriped must accommodate all road users, not just automobiles, so it seems timely to have a bolder target.)

Performance Targets for Bicycle mode appear to be low. Suggest 2% by 2030 and 10% by 2045. We are just at the beginning of lots of electric bicycles and micro mobility and the behavior of active transportation over the next 20 years will increase substantially.

RESILIENT COMMUNITIES AND NATURAL INFRASTRUCTURE

NI-4 Current Strategy Wording: Sequester carbon on natural and working lands in Contra Costa County.

NI-4: New Strategy Suggested wording: **Naturally** sequester carbon on natural and working lands in Contra Costa County.

Point 8 Existing Wording: Consider the development of carbon offset protocols and guidance for use by carbon sequestration program applicants and County permitting staff to promote appropriate sequestration on natural and developed lands.

COMMENT: We request deleting the above Action and any others in the plan that relate to offsets. We do not support use of offsets, because they continue pollution in impacted communities, and it is difficult, if not impossible, to demonstrate that an actual new GHG emissions reductions have occurred (that would not have occurred in the absence of the “offset” program).

CLIMATE EQUITY (CE) P. 123

CE-1 Action recommendations:

Point 7 Existing Wording: Provide support for State and federal programs that support family-sustaining jobs in sustainable industries, efforts to support organized labor, and living wage labor standards.

Point 7 Suggested Wording: Provide support for State and federal programs that support family-sustaining jobs in sustainable industries, efforts to support organized labor, and living wage labor standards. **Enact policies requiring labor standards for all County contracts.**

CE-2 Action recommendations:

Point7 Existing Wording: Amend the County investment policy to consider the use of Environmental, Social, and Governance criteria and to continue and improve efforts to divest from fossil fuels.

COMMENT: We are not clear on the County's current commitment to divestment, but the aim should be divestment.

CE-4 Action recommendations:

Point 3 Existing Wording: Encourage major supermarkets to locate in Impacted Communities.

Point 3 Suggested Wording: **Identify and reach out to** major supermarkets to promote their location in Impacted Communities.

CE-5: Ensure that large industrial facilities act as good neighbors.

COMMENT: Define what a good neighbor is.

LEADERSHIP STRATEGIES (L) P. 132

L-1: Establish Contra Costa County as a leader among local governments for addressing climate issues.p132.

Comment: No action addresses County Leadership in operations aiming at carbon neutrality via electrifying buildings. We note that actions to increase County government EV use appear to be covered elsewhere. This plan needs a summary of actions on how County operations themselves will measurably reduce GHG emissions and by when.

L-1 Actions Recommendations

Point 1 Existing Wording: Continue to publicize and support the operations of the County's Interdepartmental Climate Action Task Force and Green Government Group (G3) Champions

Point 1 Suggested Wording: Link the work of the County's Interdepartmental Climate Action Task Force and Green Government Group (G3) Champions groups to the goals of the CAP and related sections in the General Plan.

IMPLEMENTATION STRATEGIES (IS) P.135

IS-1 Action recommendations:

Point 4 Existing Wording: Continue to prepare an annual progress report on implementation of the recommended GHG emissions reduction strategies and progress toward the 2024 CAP goals. When information is available, provide updates on estimated GHG emissions reductions and current GHG emissions levels.

Point 4 Suggested wording: Add: This report will be presented to the Board of Supervisors and distributed widely in the community, including through the Sustainability Newsletter and in an easily found place on the County website.

Point 6 Existing Wording: Use the 2024 CAP implementation and monitoring tool to track GHG benefits from 2024 CAP implementation and identify progress toward the 2024 CAP reduction goals.

Point 6 Suggested wording: Develop a publicly shared dashboard to track GHG reductions and benefits of these reductions per the aims of the 2024 CAP. The dashboard, will be updated in real time intervals to show progress toward GHG reductions and related benefits. We recommend posting this on the County web site, as this example from San Jose:

<https://www.sanjoseca.gov/your-government/departments-offices/environmental-services/climate-smart-san-jos/climate-smart-data-dashboard>

IS-3 Action recommendations:

Point 1 Existing Wording: Identify funding sources and levels for reduction strategies as part of annual reporting.

Point 1 Suggested wording: County DCD will provide support and leadership to track funding sources and encourage development of project-ready ideas that can compete for competitive funding opportunities. DCD and other departments will continue to cultivate and create relationships with community, private sector and other government partners to ensure best project plans requiring collaborative efforts are developed.

Point 3 Existing Wording: Pursue local, regional, state, and federal grants to support implementation.

Point 3 Suggested wording: DCD will build upon or create a funding source tracking tool, alert key units and departments about imminent opportunities for pursuit of local, regional, state and federal grant opportunities to support implementation.

NEW action: Explore opportunities for a climate bond, and report to the BOS on possible options.

IS-4: Continue to update the baseline emissions inventory and Climate Action Plan every five years.

COMMENT: Is current best practice for municipalities to still update emissions inventories every five years? Since early progress is most important, is there feasibility and benefits to updating in 3 years?

Table 12 Work Plan (P135)

Time Frame: The year by which a strategy should be effective by fiscal year's end. The exact status of a strategy will vary based on its actions, and many strategies will be ongoing through and beyond 2030. An effective strategy will be one that is actively on track to achieve its GHG emissions reductions, support adaptation to climate change effects, or achieve long-term resilience. For a strategy to be effective, the necessary programs and efforts should be active, and any infrastructure or other capital improvements should be in place. The effective year is not the end year—many of the strategies are intended to remain in effect for the foreseeable future, so they do not have end dates. Time frames for effectively setting up the strategies are:

- Near Term (by 2026)
- Mid-term (by 2028)
- Long Term (by 2030)

COMMENT: The matrix seems to cover action information that is covered, for the most part, in other sections of the plan. The use of near term, mid term and long term is confusing. If these truly are start dates for the strategies, some seem to be started quite late.

A first year or two year work plan would be preferable with measurable milestones, timeline, and designation of what unit or department is responsible. Using a smart objectives framework would be clearest. It could still acknowledge plan fluidity based uncertainties that may hinder progress, or present new opportunities to move faster. This works especially well if the Strategies are higher level measurable results that the work plan can track against.

We thank the County for the opportunity to provide feedback on the CAP. We the undersigned are offering the above comments and suggested changes to the Climate Action Plan:

Marti Roach and Lisa Jackson, 350 Contra Costa Action
Denice Dennis, 1000 Grandmothers For Future Generations
Shoshana Wechsler, Sunflower Alliance
Bruce Ohlson, Bike East Bay
Jan Warren, Chair, Interfaith Climate Action Network

Benisa Berry, Center for Human Development and East County Community Leaders Network
Climate Justice Ministry Team, Mount Diablo Unitarian Universalist Church.
Mark Van Landuyt, Mount Diablo Sierra Group
Bill Olson, Citizens Climate Lobby - Contra Costa Chapter
Paul Seger, Sierra Club Delta Regional Group.
Martha Kreeger, Sierra Club, SF Bay Chapter
Arthur Bart-Williams, GRID Alternatives
Sheila Tarbet, Elders Climate Action, NorCal Chapter
Victor Flores, Greenbelt Alliance
Fred Bialy, Lynda Deschambault, Brenna Shafizadeh, Climate Reality
Contra Costa County Policy Action Squad
Doug Bleakly, Sustainable Contra Costa
Lynda Deschambault, Contra Costa County Climate Leaders
Ali Uscilka, Healthy & Active Before 5

March 26, 2024

By Email to “John.Kopchik@dcd.cccounty.us”

John Kopchik, Director
Department of Conservation & Development
30 Muir Road
Martinez, CA 94553

RE: AIA Comments on the Public Review Draft of the County General Plan

Dear Mr. Kopchik:

Following are comments of the Alamo Improvement Association on the October 2023 Public Review Drafts of the Contra Costa County General Plan and Climate Action Plan:

Stronger Communities Element – Alamo-Castle Hill Community Profile

1. Policy 6: The words “minor, localized” should be added so that it reads: “Maintain Danville Boulevard and Stone Valley Road as two-lane roadways outside of Alamo’s business district. Support **minor, localized** infrastructure and roadway improvements, including potential turn lanes and other strategies to improve traffic flow”. This is essentially language from the current General Plan.

Land Use Element

2. Table LU-1, Land Use Designations:
 - a. Residential Low Density (RL) land use designation: R-12 zoning should be removed as consistent with the Residential Low Density (RL) land use designation. 12,000 sq. ft. lots produce a 3.6 du/ac net density, which exceeds the maximum 3 du/ac density for this designation.
 - b. Residential Low-Medium land use designation: R-15 zoning should be added as consistent with this designation. The description of the designation states that it typically includes lots from 6,000 to 15,000 sq. ft.
 - c. Mixed-Use Community-Specific Density land use designation: The description of this designation does not clarify whether the maximum residential density and the maximum commercial FAR are additive on a given site. For Alamo, the proposed range of residential density is 22 to 40 du/ac and the maximum commercial FAR is 1.75. The intensity of these two combined in Alamo’s downtown area would be extreme, and far too

intense for the current or foreseeable infrastructure. Commercial development with a 1.75 FAR over the areas proposed would be too intense by itself. The maximum commercial FAR should be 1.25-1.5. There should also be some form of balancing formula that reduces the allowable commercial FAR as the residential density increases (e.g. 40-30 du/ac-0 FAR; 30-22 du/ac-0.5 FAR; 22-1 du/ac-1.0 FAR; 0 du/ac if allowed-1.5 FAR).

3. The Urban Limit Line (ULL) and Non-Urban Land Use Designations: The Plan does not explain why the total land within the Urban Limit Line and city-adopted Urban Growth Boundaries is 47% of the area of the county, even though Measures C-1990 and L-2006 limited the urban use of the county to 35% of its area and created an Urban Limit Line to define that area. The Plan states that "The County and cities must work cooperatively to maintain over 60,000 acres within the ULLs/UGBs under non-urban land use designations." The intent of the ULL to be the mechanism to maintain the 35%/65% balance of urban and rural uses seems to have been lost. The Plan references no other compulsory mechanism or single point of responsibility for monitoring and preventing changes that would exceed the 35% limit of urban land use. The Plan should create such a mechanism.
4. Action LU-A5.2 (Regarding Reducing or Eliminating Minimum Parking Requirements): This action specifies that at least every five years the County intends to evaluate its off-street parking standards. It further states that "Each evaluation should assess the appropriateness of reducing or eliminating parking minimums, taking off-site impacts into account, and recommend strategies for reducing parking demand". The need for parking varies between communities, depending on geography, density, and availability of transportation alternatives. The words "and the variation in parking needs between communities" should be added such that the phrase reads "Each evaluation should assess the appropriateness of reducing or eliminating parking minimums, taking off-site impacts **and the variation in parking needs between communities** into account, and recommend strategies for reducing parking demand".

Conservation & Open Space Element

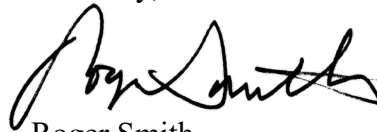
5. Add a Policy Regarding the Urban/Suburban Tree Canopy: Add a policy to the Conservation and Open Space Element regarding the importance, protection, and enhancement of the county's existing tree canopy as a whole. Such language might read as follows: "**Recognize the scenic, climatic and environmental values provided by existing urban and suburban tree canopies as a whole and consider actions to protect and enhance the urban/suburban forests in**

the County for both native and non-native trees, through public and private preservation and conservation."

6. Action COS-A6.1 (Regarding Updated the County's Tree Protection Ordinance): Add the words "considering all tree species" such that the action reads: "Update County Ordinance Code Chapter 816-6 – Tree Protection and Preservation, to enhance tree protections and strengthen mitigation requirements/restitution for tree removal, **considering all tree species**".

7. Action COS-A14.7 (Regarding Conversion of Existing Homes and Businesses to Use Low- or Zero-carbon appliances): The action currently reads: "Create a detailed roadmap to convert existing homes and businesses to use low- or zero-carbon appliances. The roadmap should include steps to support converting buildings to rely on low- or zero-carbon energy using an equitable framework that minimizes the risk of displacement or significant disruptions to existing tenants." Add to the end of the current language the words: "**Monitor the electrical grid's sources of electrical generation and ability to deliver increased electrical energy. Adjust the pace of gas-to-electric conversion in the county such that conversions do not overload the grid or reduce reliability.** (This comment also applies to similar policies/actions in the Climate Action Plan)

Sincerely,



Roger Smith
President

cc: Supervisor Candace Andersen (by email)
Will Nelson (")
Cameron Collins (")
Alamo MAC Members (by bcc email)
AIA Board & Planning Committee (by email)

From: Email Request
Sent: Wednesday, April 3, 2024 10:24 AM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: end fossil fuel extraction, transport, and processing in Contra Costa County

From: Chris Lish <lishchris@yahoo.com>
Sent: Wednesday, April 3, 2024 10:24:10 AM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Subject: end fossil fuel extraction, transport, and processing in Contra Costa County

You don't often get email from lishchris@yahoo.com. [Learn why this is important](#)

Wednesday, April 3, 2024

To Contra Costa County Council:

I strongly support the new, revised policy on oil and gas drilling and appreciate that county staff has been listening to county residents and residents of neighboring counties calling for an oil and gas drilling in Contra Costa. I strongly support the commitment to develop a feasibility study and a new land use ordinance that would amend the County Ordinance Code to prohibit development of new oil and gas wells and phase out existing oil and gas well operations. Please implement a moratorium to prevent any more permit approval while the new ordinance is developed. Communities adjacent to Contra Costa oil fields must be fully protected while the new policy is created.

I am pleased to see an implicit acknowledgement of the health and safety dangers of oil and gas drilling in the inclusion of 3,200-foot setbacks, but would like even stronger protection in place. Current research shows that a 3,200-foot setback from drilling sites is actually on the *lower* end of the range of distances that could reduce the harmful health and quality of life impacts from toxic emissions and exposures. A 2021 [Stanford study](#) found negative health impacts within a 2.5-mile radius from oil and gas facilities. The [state investigatory panel](#) that declared 3,200-foot setbacks the minimum protective distance also found that the most health-protective approach is no drilling at all.

Current oil and gas production in the County is woefully under-monitored by state regulators, leaving Contra Costa residents at risk. Please add a requirement for regular, periodic monitoring of existing oil and gas infrastructure by County Hazardous Materials staff of methane and other dangerous emissions.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish



BOARD MEMBERS

43885 SOUTH GRIMMER BOULEVARD • FREMONT, CALIFORNIA 94538
(510) 668-4200 • www.acwd.org

MANAGEMENT

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General Manager
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GIRUM AWOKE
Engineering and Technology
LAURA J. HIDAS
Water Resources
JONATHAN WUNDERLICH
Finance and Administration

April 4, 2024

VIA ELECTRONIC MAIL

Attn: Will Nelson (AdvancePlanning@dcd.cccounty.us)
Contra Costa County Department of Conservation and Development
30 Muir Road
Martinez, CA 94553

Dear Mr. Nelson:

Subject: Contra Costa County 2045 General Plan and Climate Action Plan Draft Environmental Impact Report

The Alameda County Water District (ACWD) wishes to thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) prepared for the Contra Costa County 2045 General Plan and Contra Costa County Climate Action Plan 2024 Updates (Draft EIR). ACWD appreciates that the County of Contra Costa (County) recognizes that the need for climate action throughout the region requires coordination amongst different jurisdictions and across sectors, such as ACWD. ACWD also appreciates that the County recognizes the importance of a low-carbon, sustainable, and resilient future especially as it relates to water supply and conservation. The District therefore supports the update and adoption of the 2024 Climate Action Plan and applauds the County's efforts to achieve carbon neutrality.

ACWD staff has reviewed the Draft EIR and offer the following comments for your consideration:

1) Water Quality

- a) *Climate Action Plan 2024 Update, Chapter 6, Table 12, DR-1 and DR-2: Ensure sustainable and diverse water supplies; 2045 General Plan, Goal COS-7, Policies COS-P7.1, COS-P7.9, PFS-4.2, SC-P4.4:* ACWD is supportive of water reuse. However, ACWD notes that water reuse applied for outdoor irrigation that is not full advanced treatment may contribute per- and polyfluoroalkyl substances (PFAS) to the Alameda Creek watershed runoff. ACWD recommends that any expanded application of recycled water for irrigation use require appropriate

measures to prevent impacts to runoff water quality. ACWD also recommends coordinating water reuse water quality with other interested parties in the Alameda Creek watershed, such as other water and wastewater utilities in Alameda County.

The following ACWD contacts are provided so the County can coordinate with ACWD as needed in reviewing these comments and coordinating on future efforts:

- Thomas Niesar, Water Supply and Planning Manager, at (510) 668-6549, or by e-mail at thomas.niesar@acwd.com, for coordination regarding water supply planning.

Again, thank you for the opportunity to comment on the Draft Environmental Impact Report prepared for the Contra Costa County 2045 General Plan and Contra Costa County Climate Action Plan 2024 Updates.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Hidas', is written over a horizontal line.

Laura J. Hidas
Director of Water Resources

al/tn

cc: Thomas Niesar, ACWD



715 P Street, 15-300
Sacramento, CA 95814

916.445.5511
DELTACOUNCIL.CA.GOV

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Daniel Zingale

EXECUTIVE OFFICER
Jessica R. Pearson

April 4, 2024

Will Nelson
County of Contra Costa
Department of Conservation and Development
30 Muir Street
Martinez, CA 94553

Delivered via email: AdvancePlanning@dcd.cccounty.us

RE: Comments on Draft Environmental Impact Report for the County 2045 General Plan and Climate Action Plan Update, SCH# 2023090467.

Dear Will Nelson:

Thank you for the opportunity to review and comment on the County of Contra Costa Draft Environmental Impact Report (DEIR) for the 2045 General Plan and Climate Action & Adaptation Plan Update (2045 General Plan). The Council recognizes that the objective(s) of the County's General Plan and Climate Action Plan Update (project) are to determine the extent and types of development needed to achieve the community's long-range vision for physical, economic, social, and environmental goals, achieve compliance with applicable State and regional policies and provide the basis for establishing and setting priorities for detailed programs.

The Council is an independent state agency established by the Sacramento-San Joaquin Delta Reform Act of 2009, Wat. Code, sections 85000 et seq. (Delta Reform Act). The Delta Reform Act charges the Council with furthering California's coequal goals of providing a more reliable water supply and protecting, restoring, and

Will Nelson

Draft Environmental Impact Report for the County of Contra Costa 2045 General Plan and Climate Action Plan Update

April 4, 2024

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enhancing the Sacramento-San Joaquin River Delta (Delta) ecosystem, which are to be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place. (Wat. Code, § 85054.)

The Council is charged with furthering California's coequal goals for the Delta through the adoption and implementation of the Delta Plan, a comprehensive long-term management plan for the Delta and Suisun Marsh. (Wat. Code, § 85300) The Delta Plan contains regulatory policies, which are set forth in California Code of Regulations, title 23, section 5001 et seq. The Delta Reform Act granted the Council specific regulatory and appellate authority over certain actions of State or local public agencies that take place in whole or in part in the Delta ("covered actions"). (Wat. Code, §§ 85210, 85225, 85225.10.) A state or local public agency that proposes to undertake a covered action is required to prepare a written Certification of Consistency with detailed findings as to whether the covered action is consistent with the Delta Plan and submit that certification to the Council prior to initiating the implementation of the project. (Wat. Code, § 85225)

The Delta Reform Act also directs the Council to review and provide timely advice to local and regional planning agencies regarding the consistency of local and regional planning documents with the Delta Plan. The Council's input includes, but is not limited to, reviewing the consistency of local and regional planning documents with the ecosystem restoration needs of the Delta and reviewing whether the lands set aside for natural resource protection are sufficient to meet the Delta's ecosystem needs. (Wat. Code, §85212)

COVERED ACTION DETERMINATION AND CERTIFICATION OF CONSISTENCY WITH THE DELTA PLAN

Based on the project location and project description provided in the DEIR, the project appears to meet the definition of a covered action. Water Code section 85057.5(a) states that a covered action is a plan, program, or project, as defined by the California Environmental Quality Act (Public Resources Code section 21065), that meets all of the following conditions:

(1) Will occur, in whole or in part, within the boundaries of the Delta or Suisun Marsh. The 2045 General Plan planning area includes lands within the unincorporated area of Contra Costa County. A portion of the planning

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Draft Environmental Impact Report for the County of Contra Costa 2045 General Plan and Climate Action Plan Update

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area is located within the Delta, and thus, the project would occur in part within the boundaries of the Delta.

(2) Will be carried out, approved, or funded by a State or a local public agency. The 2045 General Plan and Climate Action Plan and DEIR would be approved and carried out by the County, a local public agency.

(3) Is covered by one of the provisions of the Delta Plan. As described below, the project is covered by, and aligned with multiple Delta Plan regulatory policies.

(4) Will have a significant impact on achievement of one or both of the coequal goals or the implementation of government-sponsored flood control programs to reduce risks to people, property, and State interests in the Delta. The project may have a significant impact on the achievement of the coequal goal to protect, restore, and enhance the Delta ecosystem and the implementation of government sponsored flood control programs in the Delta.

The State or local agency approving, funding, or carrying out the project must file a Certification of Consistency with the Council prior to project implementation. (Wat. Code, § 85225; Cal. Code Regs., tit. 23, § 5001(k)(3).)

POTENTIALLY APPLICABLE DELTA PLAN POLICIES

The following section describes the Delta Plan regulatory policies that may apply to the project based on the information in the DEIR.

Governance Policy 1: Detailed Findings to Establish Consistency with the Delta Plan

Delta Plan Policy **G P1** (Cal. Code Regs., tit. 23, § 5002) specifies what must be addressed in a Certification of Consistency by a certifying agency for a project that is a covered action. The following is a subset of policy requirements that a project must fulfill to be considered consistent with the Delta Plan:

Mitigation Measures

Delta Plan Policy **G P1(b)(2)** (Cal. Code Regs., tit. 23, § 5002(b)(2)) requires covered actions not exempt from the California Environmental Quality Act (CEQA) to include all applicable feasible mitigation measures adopted and

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incorporated into the Delta Plan as amended April 26, 2018 (unless the measures are within the exclusive jurisdiction of an agency other than the agency that files the Certification of Consistency), or substitute mitigation measures that the agency finds are equally or more effective. These mitigation measures are identified in Delta Plan Appendix O and are available at: <https://deltacouncil.ca.gov/pdf/delta-plan/2018-appendix-o-mitigation-monitoring-and-reporting-program.pdf>.

The DEIR does not propose mitigation measures for the project. Rather, the DEIR considers that all potentially significant impacts are minimized to the greatest extent feasible through general plan policies and actions, and that no feasible mitigation is available. Council staff is available to engage in early consultation on this matter.

Best Available Science

Delta Plan Policy **G P1(b)(3)** (Cal. Code Regs., tit. 23, § 5002(b)(3)) requires actions subject to Delta Plan regulations to document the use of best available science as relevant to the purpose and nature of the project. The Delta Plan defines best available science as “the best scientific information and data for informing management and policy decisions.” (Cal. Code Regs., tit. 23, § 5001(f)). Best available science is also required to be consistent with the guidelines and criteria in Appendix 1A of the Delta Plan (<https://deltacouncil.ca.gov/pdf/delta-plan/2015-appendix-1a.pdf>) and in the Delta Plan regulations (Cal. Code Regs., tit. 23, appen. 1a).

This policy generally requires that the process used by the County to analyze project alternatives, impacts, and mitigation measures for the project be clearly documented in the DEIR and supporting record, and effectively communicated to foster improved understanding and informed decision-making, meeting the criteria in Appendix 1A.

Delta as Place Policy 1: Locate New Urban Development Wisely and Risk Reduction Policy 2: Require Flood Protection for Residential Development in Rural Areas

Certain Delta Plan regulatory policies make allowances for certain actions occurring within Contra Costa County’s 2006 voter approved urban limit line (Cal. Code Regs.,

Will Nelson

Draft Environmental Impact Report for the County of Contra Costa 2045 General Plan and Climate Action Plan Update

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tit 23, § 5010(a)(2), § 5013(a)(2). Specifically, Delta Plan Policy **DP P1**, limits new residential, commercial, and industrial development to, in relevant part: 1) areas that city or county general plans, as of May 16, 2013, designate for residential, commercial, and industrial development in cities or their spheres of influence; and 2) areas within Contra Costa County's 2006 voter-approved urban limit line, except that no new residential, commercial, and industrial development may occur on Bethel Island unless it is consistent with the Contra Costa County general plan effective as of May 16, 2013 (Cal. Code Regs., tit. 23, § 5010 and Appendix 7). Delta Plan Policy **RR P2**, requires a minimum level of flood protection for residential development of five or more parcels but does not apply to areas within Contra Costa County's 2006 voter-approved urban limit line, except Bethel Island (Cal. Code Regs., tit. 23, § 5013).

The 2045 General Plan goals appear to align with provisions of **DP P1** and **RR P2** through Land Use Element goals, such as, Goal LU-6 "Effective coordination with other agencies to ensure consistent planning, service delivery, and community development", and Goal LU-10 "Rural, agricultural, and open space areas that provide scenic value, support Delta ecosystem health, and meet the needs of the agricultural industry". Under the Conservation, Open Space, and Working Lands Element sections, Goal COS-2 "A thriving, and resilient agricultural sector based on resource conservation and sustainability practices, Goal COS-5 "Protected and restored watercourses, riparian corridors, and wetland areas that improve habitat, water quality, wildlife diversity, stormwater flows, and scenic values", and Goal COS-9 "Protected, preserved, and enhanced scenic quality, recreational value, and natural resources of the San Francisco Bay/Sacramento San Joaquin Delta estuary system and shoreline" also align with Delta Plan policies **DP P1** and **DP P2**. Lastly, the Health and Safety Element Goal HS-6 "Resilient and thriving Bayshore and Delta communities that are safeguarded and adaptively managed for rising sea levels", would align with the achievement of **DP P1** and **RR P2**.

The DEIR provides the following statement (p. 5.11-20,21):

Delta Plan Policy DP P1 requires that any new residential, commercial, or industrial development must be limited to areas within the Urban Limit Line (ULL), and also specifies that no new residential, commercial, or industrial development may occur on Bethel Island, even though it is inside the ULL, unless it is consistent with the existing General Plan. Although the proposed General Plan would redistribute

Will Nelson

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some of the existing General Plan development capacity on Bethel Island by expanding commercial uses and reducing residential uses, the proposed General Plan does not allow a net increase in allowed development on the island. Therefore, the proposed General Plan is consistent with Policy DP P1.

DP P1 covers any new residential, commercial, and industrial development on Bethel Island that is inconsistent with the Contra Costa County general plan effective as of May 16, 2013. The County should include substantial evidence in the record, including this potential finding, in a future certification of consistency for Delta Plan Policy DP P1.

The proposed 2045 General Plan includes additional actions which address the Delta Plan and related Council initiatives. Specifically, "Action HS-6.4 Coordinate with the BCDC, Delta Stewardship Council, and other involved agencies and stakeholders to create a joint-powers authority or public-private partnership to develop, fund, and implement measures that leverage the results of Adapting to Rising Tides, Bay Adapts, and other studies and programs", and Policy LU-P6.1 "Ensure that County projects and decisions on private development and land use activities within the Legal Delta are consistent with a; The Land Use and Resource Management Plan for the Primary Zone of the Delta adopted by the Delta Protection Commission, (b) The Delta Plan adopted by the Delta Stewardship Council".

The Council appreciates the County's effort to incorporate these and other provisions of the Delta Plan in the 2045 General Plan, notes that the County has continued to refer projects to the Council for review as described above, and thanks the County for its continued engagement in our Delta Adapts Adaptation Plan. We encourage the County to submit a certification of consistency to the Council using these and other goals, actions, and policies that would demonstrate how the 2045 General Plan is consistent with the Delta Plan.

CLOSING COMMENTS

More information on covered actions, early consultation, and the certification process can be found on the Council website, <https://coveredactions.deltacouncil.ca.gov>. Council staff are available to discuss the issues outlined in this letter as the County proceeds in the next stages of its project

Will Nelson

Draft Environmental Impact Report for the County of Contra Costa 2045 General
Plan and Climate Action Plan Update

April 4, 2024

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and approval processes. Please contact Pat Kelly at
patricia.kelly@deltacouncil.ca.gov with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Henderson", with a long horizontal flourish extending to the right.

Jeff Henderson

Deputy Executive Officer

Jeff.Henderson@deltacouncil.ca.gov

From: Email Request
Sent: Thursday, April 4, 2024 10:04 AM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Draft County Climate Action Plan Comments

From: Denice A Dennis <deniceadennismph@gmail.com>
Sent: Thursday, April 4, 2024 10:03:41 AM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Cc: John Gioia <John.Gioia@bos.cccounty.us>; Supervisor Federal Glover <DistrictFive@bos.cccounty.us>; Gail Gordon <gailsusangordon@gmail.com>; Marinell Daniel <marinelldaniel@gmail.com>
Subject: Draft County Climate Action Plan Comments

You don't often get email from deniceadennismph@gmail.com. [Learn why this is important](#)

Dear staff and members of the Board of Supervisors Sustainability Committee,

This letter is official comment on the draft County Climate Action Plan. This letter focuses on several “high level” concerns with the current draft of the County’s Climate Action Plan related to its purpose.

1) Various Implementation and Performance Targets are contained in three separate sections of the document. In order to convey all implementation activities and performance targets, we strongly recommend that **Chapter 4 and Chapter 5 Strategies, Chapter 6 2024 CAP Implementation Matrix, and Appendix B Key Assumptions and Performance Targets Sections**, are all (minimally) cross-referenced. This would convey the fuller picture of the plan’s strategies, what actually needs to be accomplished to reduce the stated greenhouse gas emissions, and how success will be measured, for all of the community, including residents, staff, Commissioners and the Board of Supervisors.

As currently presented, the GHG Reduction Strategies described in Chapters 4 and 5 of the plan are also listed in a completely separate document, Chapter 6, 2024 CAP IMPLEMENTATION MATRIX, which includes additional information. Actual “Key Assumptions” and “Performance Measures” required to achieve the projected GHG emissions reductions assumed for each strategy are embedded in yet another section of the document within Appendix B, beginning on page 244 of the PDF.

According to the narrative contained in Appendix B, the Appendix includes the “**Key Assumptions made about the strategy’s performance, such as the level of community participation required to achieve the specified reductions by 2030 and 2045**”. It also contains the “Performance Targets, which are quantifiable metrics about the projected level of success the strategy must meet to achieve the specified reductions by 2030 and 2045”. *Both the Key Assumptions and Performance Targets are absolutely necessary in evaluating the success of each GHG reduction strategy listed.* Yet they are contained in an Appendix, and are separated from the “Key Performance Metrics” in the Implementation Plan.

2. The 2024 CAP and Carbon Neutrality Section of the CAP (page 104 of Plan/page 122 PDF) contains other areas of concern:

- a) The stated possible inability to reach GHG reduction targets in line with the state by 2045 with tools available now. We are in an urgent situation—The County needs to prioritize what we can do to move

aggressively on GHG emissions reductions in buildings, waste and transportation and just transition in order to close the gap in the plan. The science shows that have what is needed to do so--we can not rely on hoped-for technological fixes.

b) Reliance on “uncertain” carbon sequestration for results. Referenced in the section on The CAP and Carbon Neutrality (p104) are uncertainties around carbon sequestration, storage and carbon offsets as means to reach reduction goals. Industrial carbon capture and storage should not be considered as a possible future solution for GHG reduction in the County. It is expensive, and is unproven in its ability to actually reduce emissions.

c) Using offsets is another false approach that only consigns our impacted communities to continued pollution based upon offsets that often cannot be proven to be truly a new reduction in carbon. The plan needs to prioritize direct GHG emission reductions that also improves air quality for the areas of the county with the worst cumulative air pollution.

In closing, the Climate Action Plan needs to provide solid, measurable goals to getting the Unincorporated County to the greenhouse gas reductions outlined by the UN Intergovernmental Panel on Climate Change—not only for the future of life on this planet, but to provide leadership to the County’s cities and all of California to do the right thing at this urgent moment. We can no longer “kick the can” down the road—Our children and grandchildren need us to step up and do what is needed to respond to this crisis NOW.

Toward a healthy and safe future for our children and grandchildren,

Denice A. Dennis, MPH, Gail Gordon, LMFT, and Marinell Daniel
1000 Grandmothers for Future Generations

From: [Email Request](#)
To: advanceplanning@dcd.cccounty.us; [Tanya Sundberg](#); [Lauren Willey](#)
Subject: FW: Comment on Draft General Plan
Date: Thursday, April 4, 2024 5:25:21 PM

From: Denice A Dennis <deniceadennismph@gmail.com>
Sent: Thursday, April 4, 2024 5:24:59 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request <email@envisioncontracosta2040.org>
Cc: John Gioia <John.Gioia@bos.cccounty.us>; Supervisor Federal Glover <DistrictFive@bos.cccounty.us>
Subject: Comment on Draft General Plan

You don't often get email from deniceadennismph@gmail.com. [Learn why this is important](#)

This is a comment letter on the Draft 2045 General Plan, specific to COS-A14.1 in Chapter 7 (pg 44) on a new and revised policy on oil and gas drilling.

Thank you for including restrictions to gas and oil drilling in the draft General Plan. This section could be strengthened, as current research shows that a 3,200-foot setback from drilling sites is on the *lower* end of the range of distances that could reduce the harmful health—and quality of life—impacts from toxic emissions and exposures. A 2021 [Stanford study](#) found negative health impacts within a 2.5 mile radius from oil and gas facilities. The [state investigatory panel](#) that declared 3,200' setbacks the minimum protective distance also found that **the most health-protective approach is actually no drilling at all.**

The plan proposes a “**feasibility study**” to create a new land use ordinance to **prohibit development of all new oil and gas wells and phase out existing oil and gas well operations.** Please consider instituting a **moratorium on all new wells NOW to prevent any more permit approvals until new policy is considered and implemented.** Communities adjacent to Contra Costa oil fields must be fully protected while new policy is worked up.

1000 Grandmothers urges the County to act swiftly on this policy--Gas and oil drilling is inconsistent with a healthy and livable Contra Costa County, as well as the goals of reducing greenhouse gas emissions to reach the minimum reductions required by the state.

Our children and grandchildren are depending on us to do the right thing.

Denice A. Dennis, MPH
1000 Grandmothers for Future Generations

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California Council of Land Trusts
Together Bay Area



April 4th, 2024

Will Nelson, Principal Planner
Contra Costa County Department of Conservation and Development
30 Muir Rd.
Martinez, CA, 94553

Save Mount Diablo Comment Letter on Contra Costa County 2045 General Plan

Dear Mr. Nelson,

Save Mount Diablo (SMD) is a non-profit conservation organization founded in 1971 which acquires land, or interests in land, for conservation purposes and often for addition to parks on and around Mount Diablo. We also monitor land use planning which might affect protected lands. We build trails, restore habitat, and are involved in environmental education. In 1971, there was just one park on Mount Diablo totaling 6,778 acres; today there are almost 50 parks and preserves around Mount Diablo totaling 120,000 acres. We include more than 11,000 donors and supporters.

We appreciate the opportunity to comment on the draft Contra Costa County 2045 General Plan (General Plan). We found during our review that the General Plan contains many positive land use, conservation and transportation goals, policies and actions. We are pleased that the Urban Limit Line is highlighted and that beneficial activities like carbon sequestration and large-scale solar (subject to the Solar Ordinance and its provisions) are called out.

Transportation goals and policies encouraging active transportation, support for zero emissions vehicles, and other methods that reduce carbon pollution and increase non-auto dependent travel are also appreciated. Content like causes us to consider the General Plan to be a positive step in the protection of open space, biological and aesthetic resources, and sustainability overall.

However, we note that General Plan Figure TR-3 references the James Donlon Boulevard Extension as a Special Planning Area. We suggest removing any references to this project in the General Plan entirely, as it goes against the positive goals and policies found elsewhere in the General Plan because it would cause extreme environmental harm. In addition, its extremely high expense would waste important funds for no reduction in congestion or Vehicle Miles Travelled, as we have commented on extensively in our responses to documents specifically related to James Donlon. Removing references to the James Donlon Boulevard Extension from the General Plan would increase opportunities to focus on more sustainable projects that deliver transportation benefits, cause littler environmental harm, and are much more financially feasible.

Thank you for the opportunity to provide comments.

Regards,

Juan Pablo Galván Martínez
Senior Land Use Manager



April 5, 2024

Director John Kopchik
Department of Conservation & Development, Contra Costa County
30 Muir Road, Martinez, CA 94553

Delivered by email

Subject: Comment Period Extension Request

Dear Director Kopchik:

The East Bay Leadership Council is a nonprofit employer-led organization on a mission to strengthen the economy and improve the quality of life across Contra Costa and Alameda Counties. Over EBLC's more than 85-year history in the region, we have come to understand the importance of guiding documents like the General Plan and Climate Action Plan (CAP) that set the stage for equitable economic development for decades to come.

Today we write to respectfully request that you extend, for an additional 60 days, the comment period for the Contra Costa County updated 2024 Climate Action Plan, Draft 2045 General Plan, and the General Plan and Climate Action Plan Draft Environmental Impact Report.

The additional time will be key in facilitating further input from employer stakeholders, discussions with County staff, and increased focus on the integration of equity and economic development in the proposed General Plan and CAP.

The East Bay Leadership Council appreciates the work that County staff has done to hear from diverse community and employer leaders to date and stands ready to ensure that these additional 60 days are worth the time. We believe that the comments received during this time will be integral to Contra Costa County's efforts to draft and implement these foundational documents.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark Orcutt", with a long horizontal flourish extending to the right.

Mark Orcutt
President & CEO
East Bay Leadership Council

CC: Will Nelson, Principal Planner, Contra Costa County

Contra Costa Building and Construction Trades Council

2727 Alhambra Ave. Suite 5
Martinez, CA 94553
FAX (925) 372-7414



Bill Whitney, CEO
Phone (925) 925-228-0900

April 5, 2024

SENT VIA EMAIL:

Federal.glover@bos.cccounty.com; John.Gioia@bos.cccounty.us; Supervisorcarlson@bos.cccounty.us; diane.burgis@bos.cccounty.us; supervisorandersen@bos.cccounty.us; john.kopchik@dcd.cccounty.us; vanbuskirk1691@gmail.com

Re: General Plan/Climate Action Plan Extension Request

Dear Chair Glover and Board members, Chair Van Buskirk and Commissioners and Director Kopchik:

The Contra Costa Building and Construction Trades represents 35,000 skilled and trained working men and women. Approximately 65% of our members are men and women of color and Indigenous people. We spend tens of millions of dollars annually training the next generation craft men and women in our apprenticeship training facilities. We have created a non-profit organization called CTWI that fosters pre apprenticeship programs in four Bay Area counties. We are committed to a green future that grows well-paying green construction jobs and support a just transition that does not mean “just unemployment” for our members.

We are concerned that the Contra Costa County updated 2024 Climate Action Plan (CAP), Draft 2045 General Plan, and the General Plan and Climate Action Plan Draft Environmental Impact Report (DEIR) do not adequately protect our jobs in the future.

As a result, we respectfully request an additional 60-day extension to your comment period that ends Monday, April 8.

We apologize that we have not had the opportunity to submit our comments to date. If the additional time is granted, it will provide us with the necessary time to submit thoughtful and helpful comments that will lead to the future adoption of these documents.

The Contra Costa Building and Construction Trades respects all the work that has gone into these documents to date and appreciates the work that County staff has done to reach out to the broader Contra Costa community to gain our insights.

Thank you for your consideration of the 60-day public comment extension.

Sincerely,

Bill Whitney
Contra Costa Building and
Construction Trades Council

April 5, 2024

Demian Hardman
Jody London
Staff Working on CAP

Re: Revised and Adopted Comments from the Commission on the Contra Costa County Draft Climate Action Plan 2024.

Dear Demian, Jody, and Staff,

On March 25, 2024, the Commission met to review and make recommended changes to the draft comment document presented by the Draft CAP Review Working Group. Please find enclosed the revised and adopted comments from the Sustainability Commission on the Draft Climate Action Plan 2024.

Sincerely,

A handwritten signature in blue ink that reads "Luz Gomez". The signature is written in a cursive style with a long, sweeping underline.

Luz Gomez, MPH
Chair
Contra Costa County Sustainability Commission

Contra Costa County Sustainability Commission Comments on the DRAFT Contra Costa County Climate Action Plan 2024

General Comments:

- Increased collaboration and coordination with other Contra Costa county jurisdictions: We propose an implementation strategy where Contra Costa would invite all county jurisdictions annually to share CAP goals, strategies, and actions, review progress made, and act as a resource for each other (similar to the Sustainability Exchange but focused on CAP implementation).
- Fact sheets and/or summary boxes: We noted that some content could be condensed and simplified into fact sheets or summary boxes at the end of each chapter to aid understanding for readers who are not climate scientists.
- Online platform: Perhaps we missed a video tutorial for residents to learn how to navigate Konveio. Such a tool could improve user-friendliness for those not familiar with software platforms.
- 2015 accomplishments: A summary table with key accomplishments from 2015 as well as lessons learned, and course corrections would be appreciated.
- CAP and General Plan relationship: More detail on the relationship between the CAP and General Plan would be helpful. Is the CAP merely mitigation for emissions created by the GP? How does the GP address climate change in terms of adaptation and resilience?
- Addressing costs of implementation: Page 131 mentions “relative costs associated with each strategy.” Is there information about costs associated with each strategy somewhere in the CAP?
- Role of Board of Supervisors: While it may be implied that the Board of Supervisors has a role to play in implementing the CAP, it would be important to list them specifically (as you do County Departments) whenever the CAP states that a County policy needs to be changed or adopted.
- Business as usual: In relevant charts, use the term Business As Usual (BAU) to explain what would happen if the CAP was not implemented.
- Readability: We believe that readability would be improved if there were less repetition in certain places and more cross-referencing in others. For example, it was not obvious that performance metrics, partners and time frames started on page 140 (Table 12). It would have been helpful to know this while reading

earlier sections about the various strategies. This also holds true for key details contained in Appendix B starting on page B-32.

- Health, socio-economic, and racial equity considerations: Operationalize the inclusion of these considerations in policymaking and climate solutions at all levels and across all sectors given the significant impacts of climate change on all county residents, but especially the young, the elderly, low-income and communities of color, and other vulnerable populations. All CAP strategies need to be assessed for their health, socio-economic and racial equity impacts.

Recommended Technical Edits:

- The report does not identify the methods by which quantities are determined, most obvious with the references within the tables. Although methodologies are covered to some degree in Appendix B, there should be references in the body of the CAP. Overall emissions are summarized without any mention of how these quantities are arrived at, and as this document purports to be scientific and methods-driven, far better documentation is necessary.
- Values should be expressed as ranges, not precise numbers. Or at least it should be mentioned that these are approximate values.
- When describing the GHG reduction strategies and actions throughout the document, reference the percentage change that relevant actions will achieve by 2030 and 2045 based on the tables presented in the technical GHG appendix.
- Nonresidential GHG emissions between 2005 and 2019 increased by 34%, and they are projected to decrease by 93% by 2045, yet we are not told which strategies, policies, or actions will lead to this presumed decrease. These must be clearly indicated.
- Table B-2 in Appendix B (page B-6) lists annual MTCO₂e emissions from stationary sources as *informational items*. In 2019 the total emissions from stationary sources alone were **over 10 times** the total emissions from **all other County sectors combined**. Rather than burying this information in an appendix, the CAP should address this unfortunate situation head on. Even if greenhouse gas emissions from stationary sources are not directly regulated by the County, the public deserves to know what the County is doing to accelerate the transition away from highly polluting industry and to directly compensate for the high level of GHGs it emits. This critical issue deserves its own prominent section in the CAP. We note that in 2015 the CAP highlighted this information.

- GHG Inventory data update frequency: It is difficult, if not impossible, to track progress in both performance of GHG reduction measures and progress toward milestones if the data is only updated every few years. The Commission recommends at least annual updates. We recognize that the County will need to take into consideration staff capacity and funding to effectively pursue our GHG reduction targets.
- Wastewater biogas capture: Where is it included? Can we enhance methane capture in the report for wastewater? We would like to see this opportunity for GHG emissions reductions and renewable energy generation.
- For methane emissions specifically, in Appendix B we suggest a reference to “bottom-up” vs “top-down” methods and that remote sensing data suggest that some sources “bottom-up” inventories are greatly under-estimated.
(Ref: Guha, A.; Newman, S.; Fairley, D.; Dinh, T.; Duca, L.; Conley, S.; Smith, M.; Thorpe, A.; Duren, R.; Cusworth, D.; Foster, K.; Fischer, M.; Jeong, S.; Yesiller, N.; Hanson, J.; Martien, P. Assessment of Regional Methane Emissions Inventories through Airborne Quantification in the San Francisco Bay Area. In revision, 2020.)
- Missing from the draft: reduce or eliminate minimum parking requirements for new developments of certain project types.
- CAP could address some of the less common, but potentially high impact GHGs, like SF6, and other higher global warming potential gases.

Additional recommendations in Order of Appearance in the CAP

Title Page - Contra Costa County Climate Action Plan 2024 Update

Comment: Consider adding Adaptation to the title.

Executive Summary

Page ES-2, Table ES-1:


TABLE ES-1. CONTRA COSTA COUNTY GHG EMISSIONS AND EMISSION GOALS, 2019 TO 2045 (MTCO_{2e})

	2019	2030	2045
Forecast GHG emissions	1,060,440	1,199,360	1,362,620
Goal	None	658,700	164,680
GHG emissions to be reduced	N/A	540,660	1,197,940
Note: Numbers rounded to the nearest 10.			

Comment:

Readers may not understand what is meant by this table. Unless you include in the title “WITHOUT CAP IMPLEMENTATION” readers won’t understand why the MTCO_{2e} are forecast to increase from 2019 to 2045. An explanation under the table would be helpful. A good place to introduce the term “business as usual”?


TABLE ES-2. 2024 CLIMATE ACTION STRATEGIES

 **Clean and Efficient Built Environment (BE)**
Homes, workplaces, and businesses in unincorporated Contra Costa County run efficiently on clean energy.

Clean and Efficient Built Environment

Comment:


For the descriptive caption, consider adding “and become carbon neutral” after “Homes, workplaces, and businesses in unincorporated Contra Costa County run efficiently on clean energy.” Is it just unincorporated, or is it also County Operations?

 **No Waste Contra Costa (NW)**
Contra Costa County disposes of no more solid waste than 2.2 pounds per person per day (PPD).

No Waste Contra Costa

Comment:

In the descriptive caption, is it unincorporated Contra Costa and County operations or Contra Costa County? What exactly do we mean by “solid waste”? Is it waste that goes to landfills?

 **Reduce Water Use and Increase Drought Resilience (DR)**
Contra Costa County uses less water and communities are prepared for drought.

Reduce Water Use and Increase Drought Resilience

Comment:

Is it Contra Costa County, or is it unincorporated County and County Operations?

 **Climate Equity (CE)**
Contra Costa County will address environmental factors leading to health disparities, promote safe and livable communities, and promote investments that improve neighborhood accessibility.

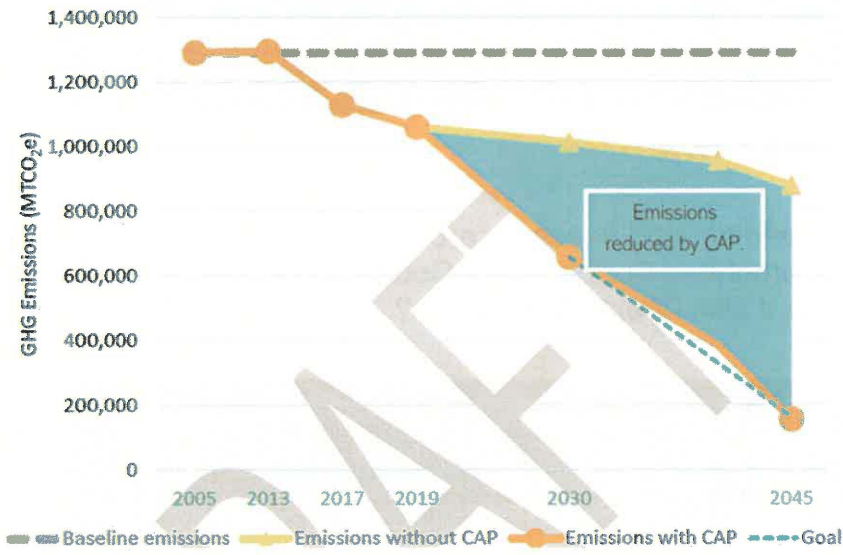
Climate Equity

Comment:

Consider adding “utilizing culturally and linguistically appropriate methods” to the description of this section.

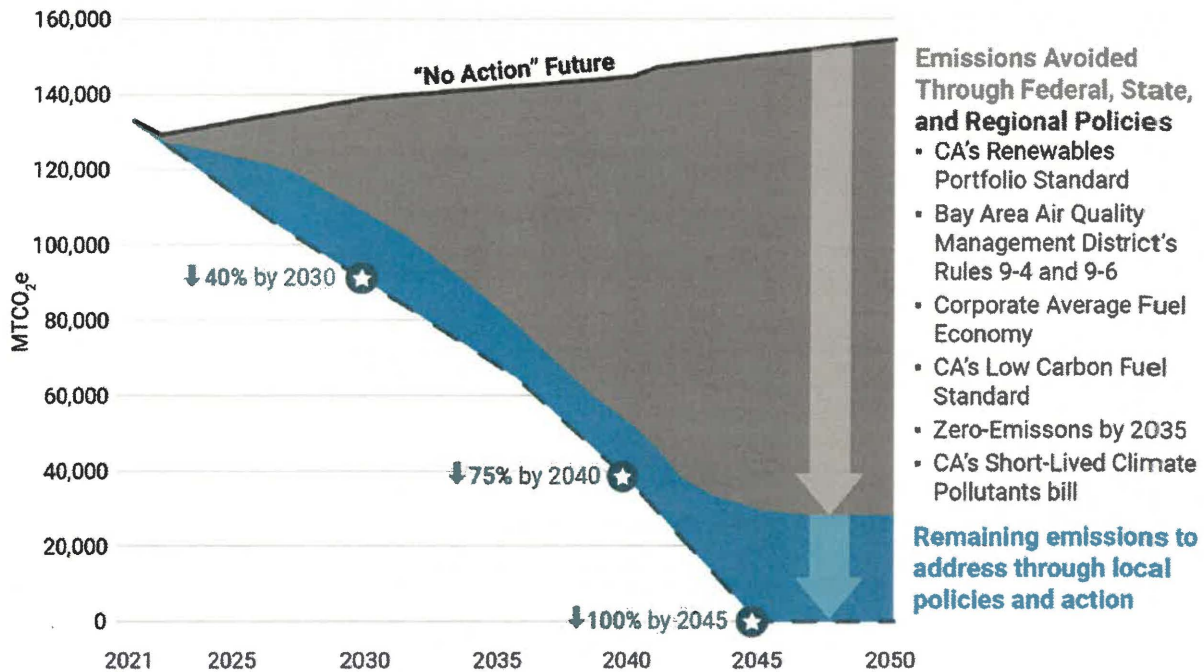
Page ES-6

FIGURE ES-1. GHG EMISSIONS WITH 2024 CAP IMPLEMENTATION COMPARED TO REDUCTION GOALS



Comment:

This table is lacking detail. Consider what the City of El Cerrito has included in their Draft CAAP, below. Could our table be more descriptive?



Page ES-7

This 2024 CAP guides new development by introducing strategies that will reduce GHG emissions associated with the built environment. The 2024 CAP is a California Environmental Quality Act (CEQA)-qualified Climate Action Plan, which means that future development projects requiring environmental review under State law can streamline their GHG impact analyses by demonstrating consistency with the 2024 CAP. This streamlining can save time and money during the environmental review process by allowing developers to reduce the number of steps involved in the environmental impact assessment process.

Comment:

Consider including (as an appendix) a checklist for developers, landowners, planners, and others to check against compliance with CAP strategies. See County of LA example here and below: https://planning.lacounty.gov/wp-content/uploads/2023/03/LA-County-2045-CAP_Rev_PublicDraft_AppendixF-Checklist.pdf

2045 CAP CONSISTENCY REQUIREMENT	DESCRIPTION OF PROJECT MEASURE(S) / DOCUMENTATION OF COMPLIANCE / EXPLANATION OF NON-COMPLIANCE	PROJECT CONSISTENCY
Step 3: Demonstrate Consistency with the 2045 CAP GHG Emissions Reduction Measures and Actions		

Energy Supply		
<p>1. TIER 1: Sunset Oil and Gas Operations For any project involving the decommissioning, replacement, retrofit, or redesign of infrastructure or facilities associated with the oil and gas industry, including energy generation (i.e., cogen), the project must:</p> <ul style="list-style-type: none"> A) Comply with the Oil Well Ordinance (Title 22). B) Reduce fossil fuel-based emissions by at least 80% compared to existing conditions. C) If the project site includes existing active and abandoned oil wells, examine all wells for fugitive emissions of methane. Reduce such existing emissions by a minimum of 80%. D) To reduce any residual fossil fuel-based emissions generated by the project, incorporate carbon removal technologies including direct air capture and carbon and sequestration, as feasible. <p>Supports 2045 CAP Measures (and Actions): ES1 (ES1.1, ES1.2, ES1.3)</p>	<p><i>Describe which project consistency options from the leftmost column you are implementing.</i> OR, <i>Describe why this action is not applicable to your project.</i> OR, <i>Describe why such actions are infeasible and identify the alternative measure proposed as a replacement strategy (provide additional documentation as described below).</i> IN ADDITION, provide documentation of the project's ability to reduce fossil fuel-based emissions, including fugitive methane emissions. Provide the number of oil and gas operations/wells closed. Provide documentation of any carbon removal technologies incorporated at the project site.</p>	<input type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply and Alternative Measure Proposed
<p>2. TIER 1: Utilize 100% Zero-Carbon Electricity The project must utilize 100% zero-carbon electricity on-site. The project must comply with one of the following options:</p> <ul style="list-style-type: none"> A) Install on-site renewable energy systems or participate in a community solar program to supply 100% of the project's estimated energy demand to the maximum extent feasible. B) Participate in Southern California Edison at the Green Rate level 	<p><i>Describe which project consistency options from the leftmost column you are implementing.</i> OR, <i>Describe why this action is not applicable to your project.</i> OR, <i>Describe why such actions are infeasible and identify the alternative measure proposed (provide additional documentation as described</i></p>	<input type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply and Alternative Measure Proposed

Page ES-7

County staff will monitor progress and provide regular updates to communities to ensure the effectiveness of each strategy. To ensure that the implementation process is efficient and transparent, the 2024 CAP includes a high-level implementation plan that identifies responsible County departments, partners, and time frames associated with each strategy.

Comment:

Consider creating an online dashboard to track strategy implementation. See San Jose's dashboard as an example: <https://www.sanjoseca.gov/your-government/departments-offices/environmental-services/climate-smart-san-jos/climate-smart-data-dashboard>

Chapter 1

1. PURPOSE

Page 5 - Climate Action and Equity

The 2024 CAP acknowledges such inequities and recognizes that Contra Costa County **must** play a role in resolving them. Though this 2024 CAP cannot solve inequity by itself, it can contribute to a more equitable future by:

- Providing resources to persons and communities who have historically been denied them.
- Integrating equity considerations into County decision-making processes.
- Supporting Impacted Communities in taking action to address climate change.
- Creating a Just Transition that helps address the root causes of climate change and system inequities.
- Ensuring that Impacted Communities have a voice in climate action planning through community-driven planning.

Comment:

It is difficult for the plan and its actions to be equitable without providing adequate language access. We urge the County to translate 2024 CAP materials into Spanish and to provide comment opportunities in other languages. See El Cerrito’s Konveio tool translation button as a one idea (<https://elcerritocaap.konveio.com/>):

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We also recommend that in-person, virtual comment, or educational efforts include simultaneous language interpretation in Spanish as well as other best-practice efforts to achieve meaningful community engagement, such as providing stipends, childcare and/or transportation when feasible.

Page 9, Table 1:

TABLE 1. COMPARISON OF TOPICS IN THE 2045 GENERAL PLAN AND THE 2024 CAP

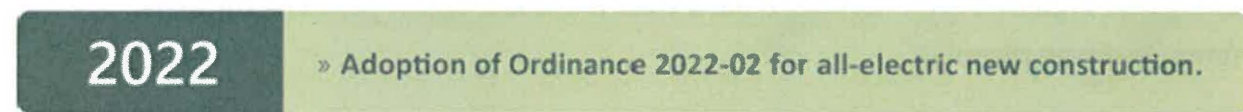
UPDATED GENERAL PLAN	2024 CAP
<ul style="list-style-type: none"> • Housing • Open space and ecological preservation • Land use patterns • Agriculture • Transportation • Flood hazards and sea level rise • Water conservation and quality 	<ul style="list-style-type: none"> • Greenhouse gas emissions • Climate change effects and vulnerabilities • Agricultural pests and diseases, air quality, drought, extreme heat, flooding, fog, human health hazards, landslides and debris flows, severe storms, sea level rise, shoreline flooding, and wildfires

Comment:

We found the comparison table between the General Plan and the CAP to be confusing. It would be most helpful to include on the left column only items in the GP that are not in the CAP, and on the right side, only items in the CAP that are not in the GP.

2. CLIMATE ACTION FRAMEWORK

Page 22, Figure 5:



Comment:

This is the first reference to the 2022 all-electric new construction ordinance. Consider adding an asterisk or reference to an explanation of what happened and how Staff is approaching a new plan.

Page 26

COUNTY REACH CODES

The County has adopted building and energy provisions that go beyond the State’s building and energy codes. These amendments to the State codes are commonly called “reach codes”.

Comment:

Please update all sections of the CAP that reference the Reach Code in light of Berkeley’s lawsuit and the new Board of Supervisors and County Counsel direction to staff.

3. CLIMATE CHANGES AND GHGS

Pages 35 - 36

Extreme Heat

Comment:

Mention the impact of Extreme Heat on mental health.

An example of health inequity tied to climate change is that Black Americans have been found to be at a higher risk of illness and death from heat. However, there is no biological basis for this. Instead, this finding has been linked to social factors such as poverty, neighborhood conditions, access to air conditioning, and vehicle ownership. These factors are also associated with higher rates of chronic health conditions among the Black community, including cardiovascular disease and hypertension. Long-standing patterns of racial residential segregation and institutional racism mean that Black individuals disproportionately live in high-poverty, disinvested neighborhoods, regardless of income.

Comment:

Expand language from the impact on Black residents to all low-income, impacted communities in the unincorporated areas. It would be important to highlight the impact of extreme heat on farm workers and other outdoor workers.

Page 39

Human Health Hazards



There are several diseases that are linked to climate change and can be harmful to the health of Contra Costa County community members. Examples of these diseases include hantavirus pulmonary syndrome, Lyme disease, and West Nile virus, which can be debilitating or fatal for some of the population. These diseases are carried by animals such as mice and rats, ticks, and mosquitos. Climate

Comment:

Consider renaming this section Animal-transmitted Diseases (or Vector Borne Diseases). Incorporate pest pressure and the increasing use of pesticides to combat pests.

Consider adding a section about biodiversity loss and the increase in invasive species.

Page 44

GHG Inventory

The following sections present the results of the community-wide and County operations GHG inventories for the years 2005, 2013, 2017, and 2019.

Total community-wide emissions dedined 18 percent from 2005 to 2019.

Comment:

Can we explain here why we don't have a more recent inventory given we're in 2024? What are we doing to have more timely inventories?

Page 45

- **Agriculture** is GHG emissions from various agricultural activities in the unincorporated county, including agricultural equipment, crop cultivation and harvesting, and livestock operations.



Comment:

Do we account for GHGs associated with use of ammonia/fertilizers? See:

<https://energyathaas.wordpress.com/2024/03/11/can-we-electrify-our-food/>

An interesting point to note as the County embarks on a just transition:

“Of all the products made by the petrochemical industry, the vast majority – as much as 74% – are either plastics or fertilizers.”

(<https://www.cam.ac.uk/research/news/carbon-emissions-from-fertilisers-could-be-reduced-by-as-much-as-80-by-2050>)

Page 46

TABLE 3. ABSOLUTE ANNUAL GHG EMISSIONS, 2005 TO 2019

SECTOR	2005	2013	2017	2019	PERCENTAGE CHANGE, 2005–2019
Nonresidential energy	118,740	125,350	98,850*	159,520	34%
Solid waste	243,940	224,570	223,100	220,760	-10%
Agriculture	33,350	39,300	44,880	36,130	8%
Off-road equipment	34,160	36,290	42,840	54,010	58%

Comment:

What accounted for the 34% increase in annual emissions from the Nonresidential energy category and 58% increase for the On-road equipment category? These numbers do not seem to make sense to us.

Page 48

transportation (26 percent). Emissions reductions also occurred in the solid waste sector (10 percent) and the nonresidential energy sector

2005 and 2019 were BART, water and wastewater, residential energy, and transportation.

(8 percent). These changes are primarily due to an increase in renewable and carbon-free electricity and better resource-efficiency practices by community members. Two sectors, off-road equipment and agriculture, saw increases in their emissions from 2005 to 2019. Detailed summaries of changes in GHG emissions by sector appear in Appendix B.

Comment:

The table shows an increase of 35% in the nonresidential energy sector, not 8% decrease. It shows increases in 3 sectors, not two. Explain what on-road and off-road equipment means.

Question:

Are seafaring vessels and their GHG emissions being counted in our inventory?

Page 50

Local Energy Providers

As of April 2018, approximately 88 percent of customers in unincorporated Contra Costa County are buying electricity from MCE, a not-for-profit clean energy provider. Pacific Gas and Electric (PG&E) provides electricity to most of the remaining customers, as well as providing natural gas to all customers. Some large industrial facilities receive electricity from third-party providers. Some residents heat their homes using propane, kerosene, or wood.

Comment:

Can we get newer MCE customer percentage data than 2018? Can we also get the percentage subscribing to Deep Green? Do we have a strategy to try to increase Deep Green subscribers?

Page 51

COUNTY GOVERNMENT OPERATIONS EMISSIONS INVENTORY

Contra Costa County conducted government operations emissions inventories in 2006 and 2017. In 2006, Contra Costa County government operations emissions totaled 54,130

Comment:

We notice that the latest inventory here dates to 2017. This needs an explanation.

- The largest source of emissions in 2017 is from the Employee Commute sector (25,800 MTCO_{2e}). In the 2006 inventory, Employee Commute is also the largest contributor of GHG emissions (23,530 MTCO_{2e}).

Comment:

This section could benefit from a paragraph about the pandemic, the County’s remote work policy, and the expectation that portions of this inventory would be further reduced by now.

Pages 54-56

CONSUMPTION-BASED INVENTORY EMISSIONS

Comment:

This section can use some editing. Decrease repetition. And provide context. Residents need to really understand the per-household consumption emissions relative to other areas in CA (and how they compare to the per-person CO₂ emissions mentioned earlier).

Page 58

GHG Forecast

ABSOLUTE GHG EMISSIONS FORECAST

TABLE 7. ABSOLUTE GHG EMISSIONS FORECAST, 2019 TO 2045

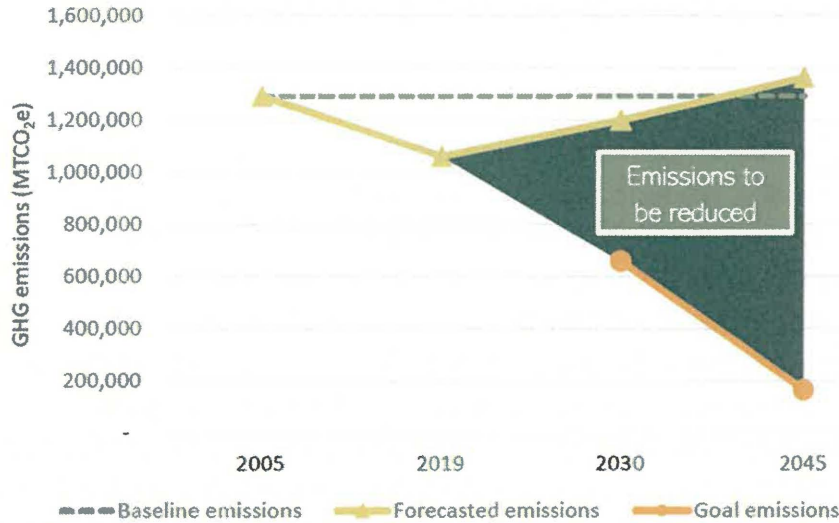
SECTOR	2019	2030	2045	PERCENTAGE CHANGE, 2019–2045
Transportation	464,040	542,020	605,080	30%
Residential energy	191,780	217,710	259,380	35%
Nonresidential energy	159,520	167,720	180,200	13%
Solid waste	220,760	229,450	260,490	18%
Agriculture	36,130	34,770	33,410	-8%
Off-road equipment	54,010	69,520	76,100	41%
Water and wastewater	4,870	5,530	6,590	35%
BART	190	220	260	37%
Land use and sequestration	-70,860	-67,580	-58,890	-17%
Total Annual MTCO_{2e}	1,060,440	1,199,360	1,362,620	28%

Comment:

This section is VERY confusing to the average reader. Without a clear explanation that these numbers reflect what would happen in the absence of any action (or business as usual) readers will wonder how we will meet our emission reduction goals. See relevant Executive Summary comment above.

4. GHG EMISSION REDUCTION STRATEGY

FIGURE 12. GHG EMISSION LEVELS AND REDUCTION GOALS



Comment:

Please see previous comment regarding the graph and the desire for more detail.

Page 67

Local renewable energy systems and energy efficiency strategies will continue to provide several co-benefits to communities, including lower electricity bills and increased resiliency against power disruptions, even if there are no measurable additional GHG emissions reductions.

Comment:

The County should incentivize and encourage the development of microgrids with a corresponding action and key performance metric. This paragraph alludes to “local renewable energy systems.” We propose creating a microgrid section.

Note:

Pages 71 – 102: Comments on the strategies and actions will be provided on Table 12 starting on page 140 of the DRAFT CAP.

Page 104

THE 2024 CAP AND CARBON NEUTRALITY

The 2024 CAP achieves significant reductions in GHG emissions and places Contra Costa County on a path to support statewide carbon neutrality by 2045. Currently, there is insufficient guidance and certainty around local carbon sequestration, storage, and potential carbon offset strategies to mathematically demonstrate with certainty that the 2024 CAP will achieve carbon neutrality by 2045. However, the County believes that such

Comment:

We would like the CAP to be clearer throughout when using the term “carbon sequestration.” While the term is defined in the glossary, we recommend using “natural” or “biological” carbon sequestration whenever we mean carbon storage in vegetation, soils, etc. The above statement regarding carbon storage and offsets suggests that the County will contemplate these strategies to help it achieve its carbon neutrality goals. For any industrial (underground or geologic) carbon capture and storage projects, the County should vet methods, consider externalities, and establish guard rails to prevent harm. It should be the County’s goal to pursue carbon emission source reductions first. Regarding carbon offsets, the County should ensure any such strategy is high quality if it must be utilized. Further, we would like the County to not imply or suggest support for industrial underground carbon capture and storage (CCS) given significant current uncertainty about its actual benefits and harms.

5. CLIMATE ADAPTATION STRATEGY

Page 114

RESILIENT COMMUNITIES AND NATURAL INFRASTRUCTURE (NI)

CONTRA COSTA COUNTY WILL INCREASE RESILIENCE TO CLIMATE HAZARDS AND FOSTER COMMUNITY HEALTH.

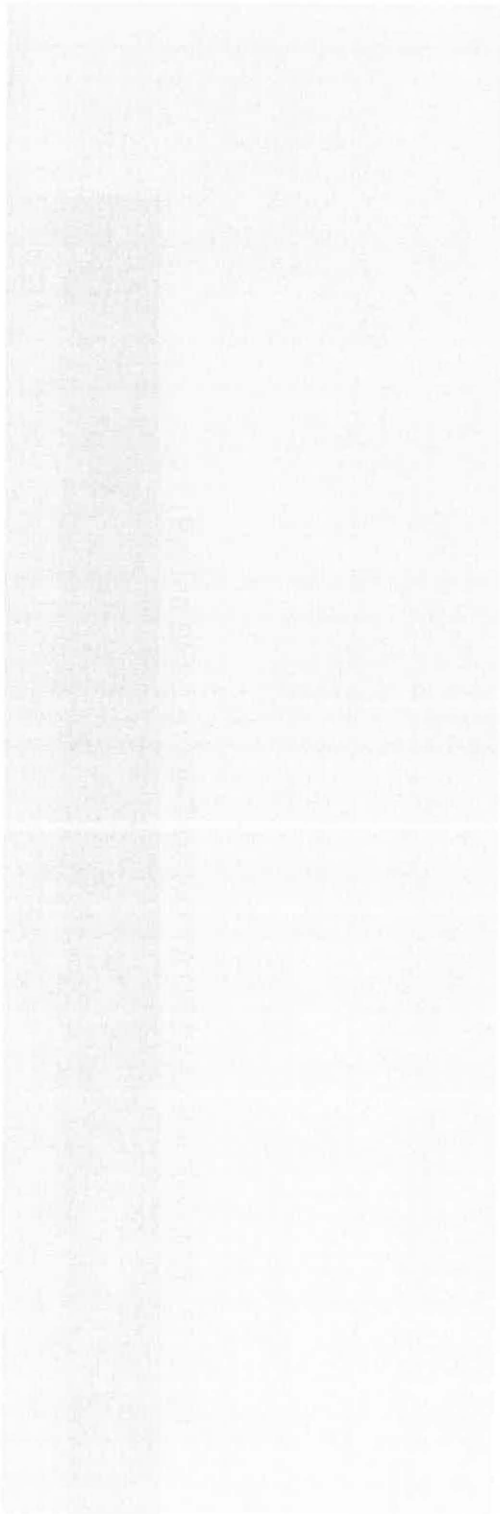


The 2024 CAP takes steps to improve the resilience of Contra Costa County’s unincorporated communities by ensuring that structures and infrastructure are responsive to flooding, sea level rise, fire, heat, and other climate change hazards. Natural

Comment:

Consider including County Operations (not just unincorporated communities) as you describe the steps the CAP takes to improve resilience.

Note: Pages 115 – 138: Comments on these strategies and actions will be provided on Table 12 starting on page 140 of the DRAFT CAP (page 19 of this comment document).



**Comments on Table 12 of 2024 CAP Implementation Matrix
(see next page)**

Table 12 2024 CAP IMPLEMENTATION MATRIX (pg. 140 of CAP)

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
Clean and Efficient Built Environment: Homes, workplaces, and businesses in unincorporated Contra Costa County run efficiently on clean energy		
<p>BE-1: Require and incentivize new buildings and additions built in unincorporated Contra Costa County to be low-carbon or carbon neutral.</p> <ul style="list-style-type: none"> - Consider adopting new or modified reach codes that exceed the California Building Standards Code to require the use of lower-carbon intensive energy sources, to achieve higher feasible levels of energy conservation and efficiency, and to achieve lower feasible levels of GHG emissions. (COS-A1 4.4) - Maintain, update, publicize, and enforce the County Ordinance Code Title 7 - Building Regulations amendment requiring new residential buildings, hotels, offices, and retail to be all-electric. Evaluate the feasibility of including other building types as appropriate. (COS-A1 4.5) - Partner with community groups and MCE to establish an induction cooktop loaner program for county residents. - Design and construct new County facilities to be zero net energy to the extent feasible. (COS-P1 4.8) - Study the feasibility of establishing a low-carbon concrete requirement for all new construction and retrofit activities and consider additional strategies to reduce embedded carbon in construction materials. The intent is to determine what the County can and should do to support or exceed State requirements for net-zero emissions for cement use by 2045. (HS-A3.2) - Provide educational materials to encourage project applicants to incorporate passive solar design features into new developments and significant reconstructions. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> - Implement the reach code. (Conservation and Development) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> - Participation in energy efficiency and weatherization programs by new residential and commercial buildings (including County facilities), with attention to participation in Impacted Communities. (Conservation and Development - community; Public Works - County facilities) - Energy efficient lighting and other appliances and mechanical systems in new County buildings. (Public Works) - Completed report exploring requirements for low-carbon concrete in new construction. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - BayREN - Local contractors, developers, architects, and Contra Costa County Building Trades Council - MCE - PG&E - Building Industry Association - BAAQMD <p>Applicability</p> <ul style="list-style-type: none"> - County operations - New development - Residents in unincorporated areas. <p>Time Frame</p> <p>Near term (by 2026)</p>


Commented [LG1]: CONSIDER ADDING: and become carbon neutral

Commented [LG3]: Update Key Performance Metric regarding the reach code.

Commented [LG4]: Add supportive performance metric 4 for educational materials action: Educational and promotional materials for clean, green buildings developed and distributed.

Commented [LG5]: Modify supportive metric 2 to say "HVAC" systems vs. mechanical systems (if that's what is meant?).

Commented [LG2]: Reword the first two actions given the Berkeley court decision. Include the latest direction from the Board of Supervisors.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME	
<ul style="list-style-type: none"> - Promote additional sustainable building strategies and designs, including small and "tiny" homes, to project applicants as site appropriate. Consider requiring additional sustainable features as a condition of approval, including reuse of materials to minimize embedded carbon. 			<p>Commented [LG6]: Split into two actions. The 8th action would become: Require additional sustainable features as a condition of approval, including reuse of materials to minimize embedded carbon. Consider adding: circular economy strategies language. Consider creating policies that require or incentivize reuse/remanufacturing/recycling of materials in the built environment</p>
<p>BE-2: Retrofit existing buildings and facilities in the unincorporated county, and County infrastructure, to reduce energy use and convert to low-carbon or carbon-neutral fuels.</p> <ul style="list-style-type: none"> - Create a County policy or program to facilitate making existing residential and nonresidential buildings more energy-efficient and powered by carbon-free energy. (COS-A14.6) - Require replacement and new water heaters and space heating and cooling systems to be electric if the building electric panel has sufficient capacity in accordance with BAAQMD Regulation 9, Rule 4, and Regulation 9, Rule 6. (COS-P14.10) - Create a detailed roadmap to convert existing homes and businesses to use low- or zero-carbon appliances. The roadmap should include steps to support converting buildings to rely on low- or zero-carbon energy using an equitable framework that minimizes the risk of displacement or significant disruptions to existing tenants. (COS-A14.7) - Evaluate options for incentivizing and requiring additions and alterations to be energy efficient and to achieve the lowest feasible levels of GHG emissions, including upgrades to the building electric panel, as needed. (COS-P14.8) - Ensure County-led and supported retrofit programs incentivize and prioritize conversion of buildings built before 1980 and emphasize assistance to owners of properties that are home to very low-, low-, and moderate- income residents and/or located in Impacted Communities, as permitted by available funding. (COS-A14.9) 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> - Participation in energy efficiency and weatherization programs, including retrofits and site rehabilitation, by existing residential and commercial buildings (including County facilities), with attention to participation in Impacted Communities. (Conservation and Development) - Roadmap to convert existing buildings to all-electric (Conservation and Development) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> - Energy efficient lighting and other appliances and mechanical systems. (Conservation and Development) - Expanded or created retrofit programs to complement weatherization programs that serve low-income county residents. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - BayREN - Local contractors, architects, and Contra Costa County Buildings Trades Council - MCE - Neighborhood Preservation Program - Contra Costa County Asthma Initiative <p>Applicability</p> <ul style="list-style-type: none"> - County operations - Existing development - Residents in unincorporated areas. - Businesses in unincorporated areas. <p>Time Frame</p> <p>Near term (by 2026)</p>	<p>Commented [LG7]: Consider adding a percentage of buildings and facilities to retrofit by 2030 and 2045 and adjust time frame accordingly.</p> <p>Commented [LG8R7]: Add a public education activity to BE-2.</p> <p>Commented [LG10]: Supportive Metrics:</p> <p>1: Is this to be tracked for County buildings/infrastructure? What does "mechanical systems" mean?</p> <p>Note: Consider adding a metric to track the number of permits for additions/remodels and type of efficiency measures required.</p> <p>Commented [LG9]: 2: Consider removing the following language: "if the building electric panel has sufficient capacity."* Instead, create a separate action that encourages the use of electric panels, including the use of new technology such as smart panels and other tools that do not force the upgrade of a panel when electrifying an existing building.</p> <p>3: Add "implement" after "create" regarding the building electrification roadmap. * Adjust the time frame accordingly since implementation will happen through 2045.</p> <p>4: Reword "upgrades to the building electric panel, as needed" to "upgrades or installation of low-cost panel capacity mitigation devices, as needed."*</p> <p>Note: Consider adding an action regarding improving and increasing energy-related code enforcement.</p>

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> - Explore opportunities, in collaboration with partner agencies, to create new incentives or publicize existing ones to support updating existing buildings to achieve the lowest feasible levels of GHG emissions. - Work to continue to obtain funding with partners such as BayREN and MCE to implement a program or programs to provide reduced-cost or free energy-efficiency and zero-carbon retrofits to local small businesses and households earning less than the area median income, in support of the Contra Costa County Asthma Initiative, Contra Costa County Weatherization Program, similar County programs, other nonprofit partners, and other health equity efforts for Impacted Communities. Support the use of low-emitting materials, including paints and carpeting, in retrofits to improve indoor air quality. - In partnership with MCE and BayREN, continue to support voluntary home and business energy efficiency retrofits, including all-electric measures. - Facilitate participation by homes and businesses in demand response programs. - Continue to conduct energy and water tracking activities, audits, and upgrades of County facilities, including conversion of feasible County facilities to all-electric space and water heating. - Advocate for modifications to the federal Weatherization Assistance Program that expand eligible measures to include whole building clean energy improvements, such as wall insulation, duct sealing, electric panel upgrades, electric heat pumps, and related measures. Advocate for an increase in the income eligibility limits for the Weatherization Assistance Program. - Implement requirements for cool roofs and light-colored, nonreflective permeable paving materials as part of retrofit, repair, and replacement activities, using recycled materials or other 		

Commented [LG11]: Consider adding an action that addresses training roofers, electricians, and other relevant trades in partnership with community colleges and labor unions.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<p>materials with low embedded carbon as feasible and as established by the Building Standards Code.</p>		
<p>BE-3: Increase the amount of electricity used and generated from renewable sources in the county.</p> <ul style="list-style-type: none"> - Require new commercial parking lots with 50 or more spaces to mitigate heat gain through installation of shade trees, solar arrays, or other emerging cooling technologies. Prioritize the use of solar arrays where feasible and appropriate. (HS-P8.3) - Encourage property owners to pursue financial incentives for solar installations and energy storage technologies, such as battery storage systems, on new and existing buildings. - Work with MCE to increase enrollment, especially in the Deep Green tier. - Continue to enroll all eligible, non-solar-equipped County facility electricity accounts in MCE territory in the Deep Green tier. - Work with the Contra Costa County Fire Protection District and other organizations that provide fire protection services to provide education and promote incentives for battery storage systems that can increase the resilience of homes and businesses to power outages. - Encourage installation of battery storage systems in new and existing buildings, especially buildings with solar energy systems and buildings that provide essential community services. (COS-PI 4.7) - Provide information about battery storage systems with all applications for new home construction and solar panel installations. - Pursue implementation of recommendations of the 2018 Renewable Resource Potential Study. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> - Number and percent of County and community accounts enrolled in MCE Deep Green (Conservation and Development) - Total megawatts of installed renewable energy capacity, by type, in the unincorporated county. (Conservation and Development) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> - Megawatts of rooftop and parking lot solar installed in unincorporated county, including County facilities and Impacted Communities. (Conservation and Development - community; Public Works - County facilities) - Megawatt-hours of installed battery storage capacity at public and private buildings. (Conservation and Development - community; Public Works - County facilities) - Percent of electricity supplied by PG&E and MCE from renewable sources. (Conservation and Development) - Number of new and existing buildings with energy storage systems, including County facilities. (Conservation and Development - community; Public Works - County facilities) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - BayREN - Fire protection districts - Contra Costa County - Local contractors, architects, and Contra Costa County Building Trades Council - MCE - PG&E - BAAQMD <p>Applicability</p> <ul style="list-style-type: none"> - County operations - Existing development - New development - Residents in unincorporated areas. - Businesses in unincorporated areas. <p>Time Frame</p> <p>Mid-term (by 2028)</p>

Commented [LG12]: New proposed action: In partnership with MCE, proactively identify opportunities for industrial scale solar plus battery projects in unincorporated Contra Costa to benefit impacted communities.

Commented [LG14]: Consider adding "tracked" at end of this supportive metric.

Commented [LG13]: Can this action include promoting the creation of microgrids to increase resilience in the most vulnerable communities?

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> Evaluate the least-conflict feasible locations for stand-alone battery storage systems and modify land use regulations to enable such use in these locations. 		
<p>No Waste Contra Costa: Contra Costa County disposes no more solid waste than 2.2 pounds per person per day.</p>		
<p>NW-1: Increase composting of organic waste.</p> <ul style="list-style-type: none"> Ensure, through franchise agreements and other relationships with waste haulers, a source-separated organics collection service for all residential and commercial customers in County-controlled collection franchise areas. Require that new and expanded landfill operations significantly reduce GHG emissions to meet or exceed State targets to the extent feasible, and work toward carbon-neutral landfills. (PFS-P7.12) Work with wastewater providers to explore the use of organic waste as feedstock for anaerobic digesters to produce biogas that can generate electricity or fuel. Require local restaurants, grocery stores, and other edible food generators that handle large quantities of food to partner with food rescue organizations to divert edible food that would be otherwise disposed in landfills for distribution to those in need, in accordance with SB 1383. Collaborate with edible food recovery programs and the Community Wellness & Prevention Program to decrease food waste and address hunger. Procure compost or other products made from recovered organic waste in accordance with the County's Recovered Organic Waste Product and Recycled Paper Procurement Policy. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> Percentage of County-controlled franchise areas with source separated organics collection for residential customers. (Conservation and Development) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> Number of commercial edible food generators in County-controlled franchise areas participating in edible food recovery program. (Conservation and Development) Number of projects complying with the Model Water Efficient Landscaping Ordinance (MWELO) required to use compost. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> Residents in unincorporated areas. Businesses in unincorporated areas. <p>Applicability</p> <ul style="list-style-type: none"> Environmental justice organizations Food rescue organizations Major generators of organic waste (schools, restaurants, event spaces, grocery stores, etc.) Waste haulers Wastewater service providers Contra Costa Health, CWPP County Jail meal service Schools Hospitals <p>Time Frame</p> <p>Mid-term (by 2028)</p>

Commented [LG15]: Question: do we mean CCC or unincorporated CCC here? Do we mean waste bound to landfills when we say "solid waste"?

Commented [LG16]: Consider rewording to: "Decrease food waste and increase composting of organic waste."

Commented [LG17]: Consider adding an action and supportive metric that promotes apps for residents to help reduce food waste such as "Too Good To Go" and others.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<p>NW-2: Reduce waste from County operations.</p> <ul style="list-style-type: none"> - Establish a source-separated organics collection service at all County-owned facilities that includes recovering food waste (scraps) and food-soiled paper. - Implement three-stream recycling (trash, recycling, and organic waste) at all County-owned facilities. - Establish requirements for source-separated organics collection and three-stream recycling as conditions in lease agreements for County offices. - Conduct waste audits of County facilities, including assessing the volume and composition of all waste streams, to identify challenges with waste activities and develop educational or operational changes to address issues and reduce waste generation. - Obtain material for capital projects from local and low-carbon sources to the greatest extent feasible, including allocating additional funds to allow for such materials, and integrate appropriate standards into the County's Environmentally Preferable Purchasing (EPP) policy. - Continue to reduce paper use in County operations. Procure recycled paper and janitorial supplies in accordance with the Recovered Organic Waste Product and Recycled Paper Procurement Policy. - Continue engagement with TRUE zero-waste certification for County projects. - Enact Bay-friendly landscaping practices at County facilities. Develop County policies and practices for Bay-friendly landscaping. - Explore opportunities to reuse wood from County tree maintenance activities as an alternative to chipping. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> - Recycling, composting at County facilities. (Public Works) - Volume of waste disposed at County facilities. (Conservation and Development) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> - Recycled content of County purchases consistent with applicable requirements of SB 1383. (Public Works) - Enforcement of requirements for County vendors and contractors to adopt and implement the Environmentally Preferable Purchasing Policy. (Public Works) - Number of County facilities with Bay-friendly landscaping practices. (Public Works) - Tonnage of recycled and composted materials, by type, collected at County facilities. (Public Works) - Number of County facilities with three-stream recycling. (Public Works) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - County operations <p>Applicability</p> <ul style="list-style-type: none"> - Waste haulers <p>Time Frame</p> <p>Mid-term (by 2028)</p>

Commented [LG18]: How often?

Commented [LG20]: Number of waste audits performed

Commented [LG19]: Is reduction of plastic medical waste, disposal or recycling of batteries, and hazardous waste disposal addressed somewhere?

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> – Encourage medical facilities and medical waste recycling companies to upgrade facilities to increase the amount of medical waste recycled or reprocessed. – Explore the feasibility of transitioning to reusable products in the health sector, where appropriate, and procuring products certified as green or low carbon. 		
<p>NW-3: Increase community-wide recycling and waste minimization programs.</p> <ul style="list-style-type: none"> – Create a source-reduction program in partnership with regional agencies to promote rethinking, refusing, reducing, reusing, and regenerating of materials. – Improve educational efforts to promote better waste sorting among community members. – Work with waste haulers to expand the types of materials accepted by recycling programs as economic conditions allow. – Work with waste haulers to continue availability of curbside pickup recycling services. – Evaluate the feasibility of banning single-use plastics or establishing additional restrictions beyond those created by SB 54. – Encourage the use of reusable items over disposable materials. – Promote the Contra Costa County Recycling Market Development Zone low-interest loan program to incentivize the development of businesses that use recycled materials. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> – Actual disposed pounds per person per day (PPD) numbers year over year. (Conservation and Development) – Number of households and businesses subscribing to recycling and organics service. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> – New development – Residents in unincorporated areas. – Businesses in unincorporated areas. <p>Applicability</p> <ul style="list-style-type: none"> – Major waste generators – Waste haulers – Recycling centers <p>Time Frame</p> <p>Mid-term (by 2028)</p>
<p>NW-4: Reduce emissions from landfill gas.</p> <ul style="list-style-type: none"> – Encourage efforts at Acme, Keller Canyon, and West Contra Costa landfills to install or enhance existing methane capture technology and associated monitoring systems with a goal of increasing the methane capture rate to the greatest extent feasible. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> – Methane capture rate <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> – Tons of flared landfill gas 	<p>Potential Partners</p> <ul style="list-style-type: none"> – Landfill operators <p>Applicability</p> <ul style="list-style-type: none"> – Landfill operators <p>Time Frame</p> <p>Mid-term (by 2028)</p>

Commented [LG21]: Consider rewording “Evaluate the feasibility” to “Propose for Board of Supervisors consideration a single use plastic ban in unincorporated Contra Costa.”

Commented [LG22]: Consider adding an action: Promote use of community reuse/recycle websites and apps like Buy Nothing, Upcycle, Trash Nothing, Freecycle, etc.

Commented [LG23]: Do we address methane leaks, methane emissions, or other super pollutants in the CAP? Recommend that we do.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> – Explore opportunities for partnering with agricultural and industrial operations to generate energy from methane gas generated by their ongoing activities. – Support landfill operators in efforts to transition away from landfill gas flaring. (COS-P14.5) 		
<p>Reduce Water Use and Increase Drought Resilience: Contra Costa County uses less water and communities are prepared for drought.</p>		
<p>DR-1: Reduce indoor and outdoor water use.</p> <ul style="list-style-type: none"> – Require new development to reduce potable water consumption through use of water-efficient devices and technology, drought-tolerant landscaping strategies, and recycled water, where available. (COS-P7.1) – Require homes and businesses to install water-efficient fixtures at time of retrofit activities, in accordance with the California Building Standards Code. – Continue to enforce the Model Water Efficient Landscaping Ordinance and encourage the use of native and drought-tolerant landscaping for exempt residential and commercial landscapes through partnership with local and regional water agencies and other organizations. – Partner with water and wastewater service providers, Groundwater Sustainability Agencies, irrigation districts, and private well owners to increase participation in water conservation programs countywide. (COS-P7.2) – Facilitate offering of BayREN water bill savings programs through eligible community water providers. – Encourage the installation of graywater and rainwater catchment systems, particularly for new construction, as feasible for wastewater infrastructure. Reduce regulatory barriers for these systems and explore creating incentives for installing these systems in new and existing buildings. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> – Water use, specifically reduction in overall water use in the unincorporated county as reported by water companies. (Conservation and Development) – Water use, specifically reduction in water use at County facilities. (Public Works) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> – Square footage of native and drought-tolerant landscaping projects at County facilities. (Public Works) – Number of participants in Contra Costa Water District Lawn to Garden program. (Conservation and Development) – Number of participants in East Bay Municipal Utility District Lawn Conversion program. (Conservation and Development) – Number of water districts participating in BayREN water savings program. (Conservation and Development) – Number of customers participating in water conservation programs sponsored by water companies. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> – Water providers – Green Business Program <p>Applicability</p> <ul style="list-style-type: none"> – Central Contra Costa Sanitary District – Contra Costa Water District – East Bay Municipal Utility District – West County Wastewater District – Other water and wastewater service providers – Contra Costa Health – UC Master Gardeners – Nurseries – Property managers <p>Time Frame</p> <p>Near term (by 2026)</p>

Commented [LG24]: Unincorporated and County Operations? Or whole county?

Commented [LG25]: Several new ideas for this section:
 When appropriate, consider in-building water reuse strategies (like 181 Fremont St, SF).
 Consider promoting hydroloops (shower to toilet technology)
 Consider educating the public about future benefit of direct potable reuse of waste water given future droughts.
 Consider partnering with UCB to develop an EcoBlock like the one in Oakland, with a triple net zero goal re: water, energy and waste.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> – Identify opportunities for graywater use in public spaces and implement them as feasible. – Promote the installation of composting toilets at appropriate County facilities in locations without wastewater service. 		
<p>DR-2: Ensure sustainable and diverse water supplies.</p> <ul style="list-style-type: none"> – Encourage Contra Costa Health to work with Groundwater Sustainability Agencies to ensure that new well permit applications are in accordance with County ordinances and State construction standards and require a hydrogeological evaluation in areas with known water shortages to ensure that the sustainable yield goals can be met. – Require new development to demonstrate the availability of a safe, sanitary, and environmentally sound water delivery and wastewater treatment systems with adequate capacity. (PFS-P4.5, PFS-P4.6) – Discourage new development that may reasonably lead to groundwater overdraft, subsidence, or other negative impacts, or which may reasonably depend on the import of unsustainable quantities of water from outside the county. – Require the use of permeable surfaces for new or reconstructed hardscaped areas. – In coordination with Groundwater Sustainability Agencies, expand opportunities for groundwater recharge. – Work with water suppliers to expand recycled water systems as feasible, including considering additional treatment to allow for additional recycled water uses. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> – Amount of recycled water used. (Conservation and Development) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> – Groundwater sustainability indicators: chronic lowering of groundwater levels; reduction in storage; seawater intrusion; degraded quality; land subsidence; surface water depletion. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> – Existing development – New development – Residents in unincorporated areas. – Businesses in unincorporated areas. <p>Applicability</p> <ul style="list-style-type: none"> – Contra Costa Health – Central Contra Costa Sanitary District – Contra Costa Water District – East Bay Municipal Utility District – Groundwater Sustainability Agencies (GSAs): <ul style="list-style-type: none"> – City of Antioch GSA – City of Brentwood GSA – Byron-Bethany Irrigation District GSA – Contra Costa County GSA – Diablo Water District GSA

Commented [LG26]: Why only in locations without wastewater service?

Commented [LG27]: Consider adding policy language regarding the need to plan for laying purple pipes for recycled water in new projects and developments.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
		<ul style="list-style-type: none"> - Discovery Bay GSA - East Contra Costa Irrigation District GSA - EBMUD GSA - Zone 7 GSA - West County Wastewater District - Other water and wastewater service providers <p>Time Frame Mid-term (by 2028)</p>
<p>Clean Transportation Network: Contra Costa County's transportation network provides safe and accessible options for walking, biking, and transit. If residents and workers are driving, they are in zero-emission vehicles.</p>		
<p>TR-1: Improve the viability of walking, biking, zero-emission commuting, and using public transit for travel within, to, and from the county.</p> <ul style="list-style-type: none"> - Track over time projects that add pedestrian and bicycle facilities to document the County's implementation of the County Road Improvement and Preservation Program (CRIPP); Complete Streets checklist; Vision Zero Report and Action Plan; Active Transportation Plan; and equity-focused plans, programs, and policies. - Improve the safety and comfort of bicycle, pedestrian, and public transit facilities using best practices to encourage more people to use such facilities. - Work with CCTA to fill gaps in the countywide Low-Stress Bike Network, as outlined in the 2018 Countywide Bicycle and Pedestrian Plan. Prioritize providing access for Impacted Communities and constructing protected bicycle facilities. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> - Percentage complete and under construction of unincorporated bicycle network. (Public Works) - Linear feet of pedestrian facilities constructed. (Public Works) - Number of bicycle and pedestrian network gaps closed. (Public Works) - Measure progress on the County Road Improvement and Preservation Program (CRIPP); Complete Streets; Vision Zero; Active Transportation; and equity-focused plans, programs, and policies. (Public Works) - Number of new units (residential and commercial) located in transit priority areas. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - 511 Contra Costa - BAAQMD - CCTA - Environmental justice groups - MTC/ABAG - Transit providers - Local communities - California State Association of Counties - Advocacy organizations - East Bay Leadership Council - Safe Routes to School programs

Commented [LG28]: Consider adding new action: Encourage CCTA, Jurisdictions, and the County to add continuous bike lanes on all designated Routes of Regional Significance in the County. Where these Routes of Regional Significance are on Freeways, add the bike lanes to public streets that closely parallel the freeway.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> - In collaboration with key partners, support efforts to establish or join a shared mobility program that provides access to conventional bicycle, e-bikes, and other micromobility modes. - Support efforts to expand the service area and frequency of regional transit agencies, including AC Transit, BART, Capitol Corridor, County Connection, Tri Delta Transit, the San Francisco Bay Ferry, and WestCAT. - Maximize development of jobs and affordable housing near high-quality transit service to support a jobs-housing balance. - Market the county's Northern Waterfront to attract innovative companies with jobs for residents. - Maintain in place and enforce a Transportation Demand Management (TDM) Ordinance that reflects best practices, and, at a minimum, conforms to Contra Costa Transportation Authority's adopted model TDM ordinance or resolution. (GM-P3.5) - Improve county-wide safety for bicyclists by advocating for the passage of Vulnerable Road User Laws. - Secure additional funding for the maintenance and expansion of bicycle and pedestrian infrastructure improvements. Support efforts to obtain additional funding to maintain and expand public transit operations and infrastructure improvements. - Support CCTA to develop and implement methods for tracking EV and e-bike charging and availability across jurisdictions. - Support CCTA and regional transit agencies in providing "last mile" transportation connections and options. - Encourage and support increased regional integration of transit systems to promote more equitable fare structures, fare integration, easier transfers, including coordinated transfers between different transit systems and reduced wait times, improved information sharing, and generally a more seamless and modern system. 	<ul style="list-style-type: none"> - Number of new units of affordable housing, particularly in areas with high-quality transit. (Conservation and Development) - Transit ridership in County service areas. (Conservation and Development) - Number of employers operating transportation demand programs. (Conservation and Development) <p>Supportive Performance Metric(s): For County Operations:</p> <ul style="list-style-type: none"> - Number of employees participating in the County remote work policy. (Human Resources) - Number and percentage of County employees using the pre-tax commute benefit. (Human Resources) - Administrative Bulletin supporting videoconference and conference calls, where appropriate. (County Administrator) - Updated CRIPP Project list. (Public Works) - Grant awards for transportation projects that support 2024 CAP goals (number and amount). (Public Works, Conservation and Development) 	<p>Applicability</p> <ul style="list-style-type: none"> - County operations - Existing development - New development - Residents in unincorporated areas. - Businesses in unincorporated areas. <p>Time Frame Long term (by 2030)</p>

Commented [LG29]: Consider adding: prioritizing access for low income residents who do not own a bicycle and establish bike repair programs.

Commented [LG30]: Consider adding "and reduced fares for students, seniors, and low-income residents"

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<p>TR-2: Increase the use of zero-emissions vehicles. Transition to a zero-emission County fleet by 2035 and a community fleet that is at least 50 percent zero-emission by 2030.</p> <ul style="list-style-type: none"> - Require new County vehicles to be zero emission to the extent a viable vehicle is available on the market, that charging or zero-emission fueling equipment is conveniently located where the vehicle will be stored, and as required by the Advanced Clean Fleet regulations, with the goal that all County vehicles will be zero-emission by 2035. - Install electric vehicle charging equipment and other infrastructure needed to support the transition to a zero-emission County fleet at County facilities. Consider the appropriate locations, number, and capacity of infrastructure to facilitate the transition of the County fleet to zero-emission vehicles. - Provide incentives for zero-emission vehicles in partnership with MCE, BAAQMD, and other agencies. - Work with property owners and other potential partners to pursue installation of zero-emission vehicle charging stations in and near multifamily dwelling units. - Update off-street parking ordinance to include a requirement for zero-emission vehicle charging infrastructure. Consider including incentives for developers to exceed minimum requirements (i.e., density bonus). - Increase installation of electric vehicle charging stations for all vehicle types, including bicycles and scooters, at public facilities, emphasizing increased installation in Impacted Communities. - In partnership with regional agencies, explore providing subsidies for households making less than the area median income to purchase or lease zero-emission vehicles and associated infrastructure. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> - Number of zero-emission vehicles registered in unincorporated county. (Conservation and Development) - Percentage of County fleet that is zero-emission. (Public Works) - Implementation of an EV sharing program (Conservation and Development) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> - Number of zero-emission vehicles purchased annually for County fleet. (Public Works) - Number of EV chargers installed at County facilities, both for County fleet and public use. (Public Works) - Number of publicly accessible EV chargers installed throughout the unincorporated county. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - BAAQMD - Contra Costa Transportation Authority - Environmental justice groups - MCE - Multifamily and rental property owners - TNC and taxi providers - BART - Caltrans - East Bay Leadership Council <p>Applicability</p> <ul style="list-style-type: none"> - County operations - Existing development - New development - Residents in unincorporated areas. - Businesses in unincorporated areas. <p>Time Frame</p> <p>Ongoing</p>

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> - Pursue fees and regulatory efforts to convert transportation network company (TNC), taxi, and similar car-hire services to zero-emission vehicles. - Explore opportunities for implementing electric vehicle sharing programs. - Work with BAAQMD and other regional agencies to convert off-road equipment to zero-emission clean fuels. - Work with contractors, fleet operations, logistics companies, and other operators of heavy-duty vehicles to accelerate the transition to zero-emission heavy-duty vehicles. - Work with Public Works to pursue the use of renewable natural gas (sourced from recovered organic waste) for transportation fuel, electricity, or heating applications in cases where battery-electric, hybrid-electric, and sustainably sourced hydrogen fuel-cell sources are not available. - Encourage efforts to maximize EV charging during solar peak hours. - Support implementation of the Contra Costa County Electric Vehicle Readiness Blueprint. - ... 		
<p>Resilient Communities and Natural Infrastructure: Contra Costa County will increase resilience to climate hazards and foster community health.</p>		
<p>NI-1: Protect against and adapt to changes in sea levels and other shoreline flooding conditions.</p> <ul style="list-style-type: none"> - Require new development to locate habitable areas of buildings above the highest water level expected accounting for sea level rise and other changes in flood conditions, or construct natural and nature-based features, or a levee, if necessary, adequately designed to protect the project for its expected life. (HS-P6.1) 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> - Establish a shoreline flooding working group. (Conservation and Development) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> - Develop effective tracking metrics. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - Existing development - New development <p>Applicability</p> <ul style="list-style-type: none"> - San Francisco Bay Conservation and Development Commission

Commented [LG31]: Potential new action: Encourage the installation of CD Fast Charging facilities, especially in close proximity to freeways and in impacted communities.

Commented [LG32]: Consider adding a reference, like "according to BCDC maps" and which assumption will be used.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> – Support the use of natural infrastructure, including ecosystem restoration and green infrastructure, to protect against sea level rise and associated shoreline flooding. – Coordinate with State and regional agencies, neighboring jurisdictions, property owners, utilities, and others to prepare a sea level rise adaptation plan. – Seek funding and pursue implementation of wetland restoration and other adaptation efforts for sea level rise. – Convene a working group that includes local jurisdictions, local shoreline communities, community-based organizations, property owners, businesses, and other stakeholders to collaborate on shoreline flooding adaptation strategies. – Identify opportunities for employing natural areas as buffers against rising sea levels. 		<ul style="list-style-type: none"> – Delta Stewardship Council – Shoreline communities – Irrigation districts – Community-based organizations – Land Trusts <p>Time Frame Long term (by 2030)</p>
<p>NI-2: Protect against and adapt to increases in the frequency and intensity of wildfire events.</p> <ul style="list-style-type: none"> – Prohibit new residential subdivisions in Very High Fire Hazard Severity Zones and discourage residential subdivisions in High Fire Hazard Severity Zones. (HS-P7.1) – Require any construction of buildings or infrastructure within a High or Very High Fire Hazard Severity Zone in the Local or State Responsibility Areas, or in the Wildland-Urban Interface, to incorporate fire-safe design features that meet the applicable State Fire Safe Regulations and Hazard Reduction Around Buildings and Structures Regulations for road ingress and egress, fire equipment access, and adequate water supply. (HS-P7.2) – Require subdivisions in the High Fire Hazard Severity Zones in the Local or State Responsibility Areas, or projects requiring a land use 	<p>Key Performance Measure(s):</p> <ul style="list-style-type: none"> – Amount of funds distributed for wildfire mitigation efforts. (Contra Costa Fire Protection District and other fire protection entities) – Miles of power lines undergrounded. (Conservation and Development) – .. 	<p>Potential Partners</p> <ul style="list-style-type: none"> – Residents in unincorporated areas. – Businesses in unincorporated areas. – County operations – Existing development – New development – Sheriff's Office of Emergency Services <p>Applicability</p> <ul style="list-style-type: none"> – Community-based organizations – Contra Costa County Fire Protection District

Commented [LG33]: The time frame for this activity (by 2030) seems too long.

Commented [LG35]: Add High fire hazard residential restrictions ordinance to performance measures.

Commented [LG34]: This is confusing. Are we allowing new subdivisions in High Fire Hazard Severity Zones if they get a land use permit? The first action prohibits new subdivisions in these areas. Right?

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<p>permit in the High or Very High Fire Hazard Severity Zones in the Local or State Responsibility Areas, to complete a site-specific fire protection plan. Collaborate with the appropriate fire protection district to review and revise the fire protection plans. (HS-P7.3)</p> <ul style="list-style-type: none"> - Work with property owners in mapped High or Very High Fire Hazard Severity Zones or in the Wildland-Urban Interface to establish and maintain fire breaks and defensible space, vegetation clearance, and firefighting infrastructure. (HS-P7.4) - Support undergrounding of utility lines, especially in the Wildland-Urban Interface and Fire Hazard Severity Zones. (HS-P7.8) - Review indoor air filtration standards and consider whether filtration requirements can and should be strengthened for projects permitted by the County. - Work with community organizations to help Impacted Communities have access to financing and other resources to reduce the fire risk on their property, prepare for wildfire events, and allow for a safe and speedy recovery. 		<ul style="list-style-type: none"> - Facility operators (school districts, libraries, community centers, etc.) - Kensington Fire Protection District - Rodeo-Hercules Fire Protection District - Moraga-Orinda Fire District - San Ramon Valley Fire Protection District - Medical service providers - 211 - Red Cross <p>Time Frame Long term (by 2030)</p>
<p>NI-3: Establish and maintain community resilience hubs.</p> <ul style="list-style-type: none"> - Pursue funding to develop a resilience hub master plan that identifies existing community facilities that can serve as resilience hubs and support affected populations during hazard events. This process should start with an assessment of community needs. Such facilities should be distributed equitably throughout the county, with an emphasis on easy access for Impacted Communities. Where appropriate facilities do not exist, develop plans to create new resilience hubs. 	<p>Key Performance Measure(s):</p> <ul style="list-style-type: none"> - Adopted plan for community resilience hubs. (Conservation and Development) - Number of community resilience hubs. (Conservation and Development) - Number of permits issued for battery storage projects. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - Community-based organizations - Contra Costa County Fire Protection District - Contra Costa County Sheriff's Office of Emergency Services - Employment and Human Services - Environmental justice organizations

Commented [LG36]: Define who will do this and add a key performance metric.

Commented [LG37]: Define resilience hubs in glossary. Add "and promote microgrid deployment in impacted communities." Define microgrid in glossary. Consider adding action: Work with partners and environmental justice organizations to install microgrids in the most impacted neighborhoods in unincorporated county. Add performance measure.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> - Pursue funding to implement the resilience hub master plan, including retrofitting selected facilities to function as resilience hubs. These retrofits should involve adding solar panels, battery backup systems, water resources, supplies to meet basic community and emergency medical needs, and other needs as identified by the resilience hub master plan. - Create a virtual resilience hub that connects County resources to communities through virtual community networks to provide detailed, up-to-date information about preparing for natural disasters, public safety notifications and alerts, space for virtual gathering and information-sharing, and other appropriate uses. Materials shall be accessible in multiple languages. - Coordinate resilience hub activities with planning efforts around public safety power shutoffs and wildfire smoke resiliency. 		<ul style="list-style-type: none"> - Facility operators (school districts, libraries, community centers, etc.) - Jurisdictional fire departments - Homeless service providers - Medical service providers - 211 - Contra Costa County Office of Education - Local school districts - Red Cross <p>Applicability</p> <ul style="list-style-type: none"> - County operations - Residents in unincorporated areas. <p>Time Frame</p> <p>Mid-term (by 2028)</p>
<p>NI-4: Sequester carbon on natural and working lands in Contra Costa County.</p> <ul style="list-style-type: none"> - Pursue implementation of recommendations from carbon sequestration feasibility study, <i>Healthy Lands, Healthy People</i>. - Continue to support and work with key partners to maintain existing and establish new pilot programs for carbon sequestration on agricultural land. - Promote restorative agricultural and landscaping techniques that incorporate cover crops, mulching, compost application, field 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> - Completed feasibility study for carbon sequestration in Contra Costa County. (Conservation and Development) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> - Number of completed pilot carbon farming project(s). - Progress report on implementation of County's Green Infrastructure Plan for County facilities. (Public Works) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - Agricultural groups - Community gardening groups - Community-based organizations - Contra Costa Resource Conservation District - East Bay Regional Park District

Commented [LG39]: List childcare centers as well.

Commented [LG38]: Add air filtration.

Commented [LG42]: Add IPM Committee.

Commented [LG40]: Recommend adding "Naturally" to this strategy.

Commented [LG41]: Do we mean regenerative? Or do we include both terms?

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> borders, alley cropping, conservation crop rotation, prescribed grazing, and reduced tillage to promote healthy soil and soil conservation. (COS-P2.11) - Support soil conservation and restoration programs. Encourage agricultural landowners to work with agencies such as the USDA's NRCS and Contra Costa RCD to reduce erosion and soil loss. (COS-P2.10) - Coordinate with farming groups, ranchers, the Contra Costa Resource Conservation District, and the University of California Cooperative Extension to identify and promote varieties of feedstock, livestock, and crops that are resilient to rising temperatures and changing precipitation patterns and that increase carbon sequestration. - Explore ways to increase carbon sequestration on County-owned facilities. - Partner with regional landowners and agencies to establish carbon sequestration programs and incentives. - Consider the development of carbon offset protocols and guidance for use by carbon sequestration program applicants and County permitting staff to promote appropriate sequestration on natural and developed lands. - Ensure that any local or regional carbon sequestration program that the County establishes, promotes, supports, or joins must provide benefits to unincorporated communities that face environmental justice issues. - Explore the potential for the public to support tree planting and maintenance of existing trees. - Establish a mechanism to support expanded tree planting and maintenance activities, particularly in areas with few trees. - Support protection, restoration, and enhancement of creeks, wetlands, marshes, sloughs, and tidelands, and emphasize the role 	<ul style="list-style-type: none"> - Quantity of SB 1383-compliant compost procured and utilized by the County directly or on the County's behalf. (Public Works, Conservation and Development) 	<ul style="list-style-type: none"> - Save Mount Diablo, John Muir Land Trust, and other land conservation organizations. - Environmental justice organizations - Organizations that support regenerative landscaping and agriculture. - Regional landowners - UC Cooperative Extension - Contra Costa Health <p>Applicability</p> <ul style="list-style-type: none"> - County operations - East Contra Costa County Habitat Conservancy - Natural and working lands - Residents in unincorporated areas. - Businesses in unincorporated areas. <p>Time Frame</p> <p>Long term (by 2030)</p>

Commented [LG43]: Add "natural" to increase carbon sequestration.

Commented [LG44]: Add "natural" here.

Commented [LG45]: Question: which program is this?

Commented [LG46]: Add "natural"

Commented [LG47]: Consider reworking these actions into a policy proposal: "Propose a Tree Planting Ordinance for adoption by the Board of Supervisors that would promote resident tree planting, public/private partnerships, and maintenance efforts and expand tree planting and maintenance activities in public right of ways and in areas with low tree canopy." Or something like this.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<p>of these features in climate change resilience, air and water quality, and wildlife habitat. (COS-P5.1)</p> <ul style="list-style-type: none"> - Inventory wetlands, floodplains, marshlands, and adjacent lands that could potentially support climate adaptation (e.g., through flood management, filtration, or other beneficial ecosystem services) and mitigation (e.g., carbon sequestration). (COS-A5.1) - Encourage and support conservation of natural lands outside the urban limit line in the unincorporated county. - Explore the creation of a Climate Resilience District. - Require that any mitigation of air quality impacts occur on-site to the extent feasible to provide the greatest benefit to local residents. For mitigation that relies on offsets, require that the offsets be obtained from sources as near to the project site as possible. If the project site is within or adjacent to an Impacted Community, require offsets or mitigation within that community unless determined infeasible by the County (HS-P1.6). 		
<p>NI-5: Minimize heat island effects through the use of cool roofs and green infrastructure.</p> <ul style="list-style-type: none"> - Require landscaping for new development to be drought-tolerant, filter and retain runoff, and support flood management and groundwater recharge. (COS-P7.7) - Promote installation of drought-tolerant green infrastructure, including street trees, in landscaped public areas. (COS-P7.8) - Increase tree planting in urbanized areas, and open spaces where ecologically appropriate, emphasizing areas with limited existing tree cover, using low-maintenance native tree species that are low fire risk and ensuring water supply resources are not compromised. (COS-P6.2) - Consider preparing and implementing a Tree Master Plan for the unincorporated county. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> - Number of permits for cool roofs, both private and County facilities. (Conservation and Development) - Adoption of a Tree Master Plan. (Public Works) - Percent of heat-vulnerable communities with tree cover / number of new tree plantings. (Public Works) - Square feet of pervious pavers installed. (Public Works) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> - Number of ER visits, deaths, and associated clinical care related to extreme heat events. (Health) - Equity measure rankings on the Healthy Places Index. (Health) - Acres treated by green stormwater infrastructure. (Public Works) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - Community-based organizations - Community gardening groups - Environmental justice organizations - Organizations that support regenerative landscaping and agriculture. - Water and wastewater service providers - Contra Costa Health and related partners

Commented [LG48]: Would it make sense to add "and the issuance of green bonds as a potential financing mechanism" here?

Commented [LG49]: Consider including: "tree canopy, cool paint and pavement, and other emerging strategies" as part of the description for this strategy. Other strategies to be considered for more actions could include wind corridors, optimizing shade and vertical greenery.

Commented [LG50]: Contract with native plant businesses

Commented [LG51]: Drought and heat-tolerant

Commented [LG52]: Recommend using "fire resistant" when mentioning new trees.

Commented [LG53]: It would be stronger to say "Prepare and implement" vs. "consider preparing and implementing."

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> – Provide shade trees or shade structures at parks, plazas, and other outdoor spaces. – Update County tree ordinance to consider whether factors for approval of tree removal and/or replanting requirements are adequately considering Impacted Communities (e.g., tree cover, replanting standard). – Support efforts to develop incentive programs for home and business owners, school districts, and other local and regional property owners to increase the adoption of cool roofs and green infrastructure on private property. 		<ul style="list-style-type: none"> – East Bay Regional Park District <p>Applicability</p> <ul style="list-style-type: none"> – County operations – Existing development – New development – Residents in unincorporated areas. – Businesses in unincorporated areas. <p>Time Frame</p> <p>Midterm (by 2028)</p>
<p>NI-6: Protect communities against additional hazards created or exacerbated by climate change.</p> <ul style="list-style-type: none"> – Discourage new below-market-rate housing in High and Very High Wildfire Hazard Severity zones, the Wildland-Urban Interface, and Alquist-Priolo Fault Zones. If below-market-rate housing must be constructed within these zones, require it to be hardened or make use of nature-based solutions to remain habitable to the greatest extent possible. (HS-P3.4) – Treat susceptibility to hazards and threats to human health and life as primary considerations when reviewing all development proposals and changes to land uses. – Partner with community-based organizations to provide information to community members about how to prepare for projected climate change hazards. – Promote, and develop as necessary, available funding sources to create incentives for residents and businesses to prepare for natural disasters, particularly members of Impacted Communities. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> – Health outcomes of residents in Impacted Communities relative to the prior performance review. (Health) – Number of substandard homes that pose a health risk to residents in Impacted Communities relative to the prior performance review. (Conservation and Development) – Amount of support provided to businesses in Impacted Communities through the County's small business assistance programs relative to the prior performance review. (Conservation and Development) – The rate of poverty in Impacted Communities relative to the prior performance review. (Conservation and Development) – Development and use of climate change vulnerability and resilience screening criteria for County capital investment projects. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> – Community-based organizations – Contra Costa County Fire Protection District – Facility operators (school districts, libraries, community centers, etc.) – Kensington Fire Protection District – Rodeo-Hercules Fire Protection District – Moraga-Orinda Fire District – San Ramon Valley Fire Protection District – Medical service providers – Contra Costa Health and related partners

Commented [LG54]: Consider adding "and other cooling strategies" or name other things like cool paint and pavement.

Commented [LG58]: What are the "prior performance reviews" mentioned in these metrics?

Commented [LG55]: The flooding section on pg. ___ identifies the hazards of contaminated floodwaters reaching residents. This applies to higher sea levels reaching contaminated brownfields. What is the County doing to map these hazards and have a plan to mitigate the impact of floods and SLR?

Commented [LG56]: Wouldn't it be best to simply prohibit new housing (of any market rate) in any Very High Wildfire Hazard Severity zone? This seems to conflict with NI-2 action 1 on pg.153.

Commented [LG57]: What about in certain FEMA flood zones/maps?

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> – Consider projected impacts of climate change when siting, designing, and identifying the construction and maintenance costs of capital projects. – Actively promote and expand participation in local and regional community emergency preparedness and response programs. – Support and fund efforts to enhance ongoing community and cross-sector engagement in community-level resilience and cohesion. Support non-government organizations to actively engage in developing a network of community-level actions that enhance resiliency. 	<p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> – Number of County-led or -supported outreach and engagement activities in support of emergency preparedness and hazard mitigation. 	<ul style="list-style-type: none"> – 211 – Red Cross – Sheriff’s Office of Emergency Services <p>Applicability</p> <ul style="list-style-type: none"> – County operations – Existing development – New development – Residents in unincorporated areas. – Businesses in unincorporated areas. <p>Time Frame</p> <p>Near term (by 2026)</p>
<p>Climate Equity: Contra Costa County will address environmental factors leading to health disparities, promote safe and livable communities and promote investments that improve neighborhood accessibility.</p>		
<p>CE-1: Provide access to affordable, clean, safe, and healthy housing and jobs.</p> <ul style="list-style-type: none"> – In partnership with community-based organizations, reverse community deterioration and blight and improve personal and property safety in neighborhoods throughout Contra Costa County. – Ensure that new housing for households making less than the area median income and housing for other Impacted Communities are outside of hazard-prone areas, including for wildfires, landslides, floods, and sea level rise, or that they are hardened or make use of nature-based solutions to remain habitable to the greatest extent possible. (HS-P4.3) 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> – Funds spent by County departments on energy efficiency and other services that support the Climate Action Plan goals in Impacted Communities compared to non-Impacted Communities. (Conservation and Development, Public Works) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> – Measures of health and social impacts of climate change that can reveal significant disparities and inequities across groups. (Health) 	<p>Potential Partners</p> <ul style="list-style-type: none"> – Community-based organizations – Environmental justice groups – Local grocery stores and food banks – Housing developers and contractors – Community colleges, schools, labor unions, and local career skills training programs

Commented [LG59]: Consider adding “using culturally and linguistically appropriate methods” to this vision statement for climate equity.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> - In partnership with community-based organizations, secure funding to establish a program to provide low-cost or free air conditioning and filtration, improved insulation, low-emitting materials, energy solar and storage systems, energy efficiency, and indoor ventilation in homes, emphasizing buildings that are home to Impacted Community members. (SC-A6.2) - Track development of local micro-grid battery storage policies and systems in other jurisdictions and identify potential opportunities for Contra Costa County. - Encourage companies and entrepreneurs from local universities and national labs to create jobs in such industries as renewable energy, transportation technology, diverse forms of manufacturing, biotech/biomedical, and clean tech. - Partner with local schools, the community college district, community-based organizations, labor unions, Workforce Development Boards, and other appropriate groups to provide training for residents for family-sustaining jobs in sustainable industries. Prioritize training for people currently or recently working in polluting or extractive activities. (SC-P1.1) - Provide support for State and federal programs that support family-sustaining jobs in sustainable industries, efforts to support organized labor, and living wage labor standards. - Adopt an ordinance at least as stringent as the State's maximum idling laws, and coordinate with CARB and law enforcement to achieve compliance. (HS-A1.5) 		<ul style="list-style-type: none"> - Workforce development programs - Workforce Development Boards <p>Applicability</p> <ul style="list-style-type: none"> - County operations - Existing development - New development - Residents in unincorporated areas. - Businesses in unincorporated areas. <p>Time Frame Mid-term (by 2028)</p>
<p>CE-2: Invest in solutions to support climate equity.</p> <ul style="list-style-type: none"> - Evaluate and adjust County planning and expenditures for infrastructure and services as needed to ensure equitable investment in Impacted Communities, consistent with SB 1000. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> - Modified County investment policy to use ESG and to continue to prohibit investment in all securities issued by fossil fuel companies. (County Administrator, Treasurer/Tax Collector) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - Community-based organizations - Contra Costa Employees Retirement Association

Commented [LG60]: Consider adding this action: "In all efforts to improve climate equity, ensure language access for Limited English Proficiency (LEP) residents by providing interpretation at meetings and translation of materials into the most common languages in the unincorporated County, including the draft and final versions of this CAP."

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> - Work with County departments to incorporate addressing climate change, providing climate solutions, and enhancing community equity more fully into County operations and the broad range of services the County provides. - As part of the 2024 CAP and General Plan implementation, consider whether the strategy being implemented provides equitable benefits for Impacted Communities as a criterion for prioritization. - Continually engage communities most affected by climate change in developing and implementing climate solutions and ensure that such solutions provide benefits to Impacted Communities. - Advocate for the Contra Costa Employees Retirement Association to include use of Environmental, Social, and Governance criteria in its investment policies. - Require that the County's Deferred Compensation Plan provider make available Environmental, Social, and Governance investment options for employees participating in the County's 457 deferred compensation plan. - Amend the County investment policy to consider the use of Environmental, Social, and Governance criteria and to continue and improve efforts to divest from fossil fuels. - Work with schools, Contra Costa County Library, business groups, and community-based organizations to educate and inform community members about climate change and related sustainability topics. - Evaluate the issuance of Labeled Bonds, such as "Green", "Sustainable", or "Social" bonds, during the planning stage of a bond issuance by the County. It is the County's preference to issue Labeled Bonds if the evaluation demonstrates a financial or policy benefit to the County. 	<p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> - Advocacy for Contra Costa Employees Retirement Association to use ESG in its investment priorities and to offer environmentally and socially responsible investment choices for members. (Board of Supervisors) 	<ul style="list-style-type: none"> - Environmental justice groups - School and community college districts - Contra Costa County Library - Business groups - Youth groups <p>Applicability</p> <ul style="list-style-type: none"> - Impacted Communities - Residents in unincorporated areas. <p>Time Frame</p> <p>Mid-term (by 2028)</p>

Commented [LG61]: CCCERA does not offer investment choices for members. However, the County contracts with Empower to offer investment choices for employees who contribute funds to individual 457b accounts. The County should ensure that Empower offers ESG investment choices for employees. Note that the provider can change over time so it may be best to not name a specific company.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<p>CE-3: Increase access to parks and open space.</p> <ul style="list-style-type: none"> - Establish a goal for all residents to live within a half-mile of a park or other green space. - Support land acquisition for new parks and open space areas and protect such lands through fee title acquisition or through deed restrictions like conservation easements. - Continue to construct and develop opportunities for new trails. - Support investment in existing park facilities, in partnership with regional agencies. - Increase the tree canopy on public property, especially in Impacted Communities and areas with a high heat index, by prioritizing funding for new street tree planting and maintenance. (HS-P2.2) 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> - Number of residents in unincorporated county, including those in Impacted Communities, within a half-mile of a park or other green space. (Conservation and Development) - Total acres of parks and green space by type. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - Agricultural groups - Contra Costa Resource Conservation District - East Bay Regional Park District - Environmental justice groups - Local land trusts and land conservation groups - Housing developers <p>Applicability</p> <ul style="list-style-type: none"> - New development - Residents in unincorporated areas. <p>Time Frame</p> <p>Near term (by 2026)</p>
<p>CE-4: Ensure residents have equitable, year-round access to affordable, local fresh food.</p> <ul style="list-style-type: none"> - Support establishment of year-round Certified Farmers' Markets in all communities, prioritizing Impacted Communities. - Work with community groups to establish and maintain urban gardens, particularly on vacant lots and park land in Impacted Communities. (SC-P4.1) - Encourage major supermarkets to locate in Impacted Communities. - Support co-operative grocery markets in Impacted Communities. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> - Number of regular Certified Farmers' Markets in all communities and in Impacted Communities. (Agriculture) - Number of permits issued for urban gardens in all communities (if permits are required by policy). (Agriculture) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> - Number of residents participating in In Lieu of Services (ILOS) food benefits. (Health) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - Agricultural groups - Community gardening groups - Environmental justice groups - Farmers markets - Local grocery stores and food banks <p>Applicability</p> <ul style="list-style-type: none"> - Residents in unincorporated areas.

Commented [LG62]: This is vague. Any patch of grass would qualify.

Commented [LG63]: This action seems to fit better under NI-5 on page 157.

Commented [LG64]: How about "provide incentives for" instead of "encourage"

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
		<ul style="list-style-type: none"> – Businesses in unincorporated areas. <p>Time Frame Long term (by 2030)</p>
<p>CE-5: Ensure that large industrial facilities act as good neighbors.</p> <ul style="list-style-type: none"> – Provide recommendations to responsible permit agencies regarding permits for fossil fuel-based industries and point sources. – Regularly track data on fossil fuel production and transportation in Contra Costa County. – Encourage the economic development of industries and supply chains that emphasize a reduction in GHG emissions. – Encourage economic development and job creation in industries that advance the County's sustainability goals, using the County's policy on enhanced infrastructure financing districts. – As economic conditions change, support efforts to phase out heavily polluting and extractive industries and replace them with businesses that contribute to a regenerative and circular economy. – Require new or expanded commercial and industrial projects exceeding 25,000 square feet of gross floor area to be near zero-emission operations, including the facilities themselves and the associated fleets, except for uses with fewer than five vehicles domiciled on-site. (HS-P1.8) 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> – Quantity and type of fossil fuels produced, refined, stored in, and distributed in the unincorporated county, to the extent data are available. (Conservation and Development) <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> – Information on specific fossil fuel facilities in Contra Costa County, including changes of ownership, mergers and acquisitions, investor presentations and reports, or any other public information that may indicate a facility's interest or intent to expand in the future, considering broader market trends in oil and gas refining and export in the Bay Area. (Conservation and Development) – Local air quality metrics. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> – BAAQMD – CARB – Chambers of Commerce – East Bay Leadership Council – Community-based organizations – Environmental justice groups – Industry groups – Labor unions <p>Applicability</p> <ul style="list-style-type: none"> – Industrial operations – Residents in unincorporated areas. – Businesses in unincorporated areas. <p>Time Frame Ongoing and near term (by 2026)</p>
Leadership Strategies: Contra Costa County is a model for how local government can take action on climate issues.		
	<p>Key Performance Metric(s):</p>	<p>Potential Partners</p> <ul style="list-style-type: none"> – All County departments

Commented [LG65]: Good neighbors is vague. Needs definition.

Commented [LG66]: New suggested language: Provide comment to responsible permitting agencies on permit applications for petroleum or fossil fuel-related industries and other stationary sources of pollution highlighting any inconsistencies with the goals of this CAP.

Commented [LG67]: Do we only care about fossil fuels, or do we care about other products of petroleum refining? How regularly is regularly?

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<p>L-1: Establish Contra Costa County as a leader among local governments for addressing climate issues.</p> <ul style="list-style-type: none"> – Continue to publicize and support the operations of the County's Interdepartmental Climate Action Task Force and Green Government Group (G3) Champions. – Work with all County departments to encourage adoption of best practices from the County's Green Business Program and other practices that support the County's climate goals. – Encourage development of new policies and initiatives that support the County's climate goals. – Explore the creation of funding mechanisms, including a carbon impact fee, to support the County's Sustainability Fund for investments in County facilities if additional financial resources are needed. – Support legislative efforts to establish a green bank able to equitably finance sustainability projects, including renewable energy, energy efficiency, and green infrastructure, for residential and commercial customers. (COS-A14.10) – Ensure that funding mechanisms to address climate change minimize or avoid disproportionate financial impacts to Impacted Communities and do not exacerbate economic inequities to the extent feasible. – Facilitate trainings for County staff on climate change (including the results of the Vulnerability Assessment and the 2024 CAP technical work) and how they can support climate action through their work with the County and at home. – Encourage County employees to explore innovative technologies and programs that address climate change. – Incorporate integrated pest management into new construction and retrofit programs on County properties. 	<ul style="list-style-type: none"> – Ongoing work products and semi-annual reports from Interdepartmental Climate Action Task Force. (Conservation and Development) – Annual report on conditions placed on discretionary projects to ensure support of Climate Action Plan goals. (Conservation and Development) – Number of County departments that have adopted their own Climate Action Plan. (Conservation and Development) – .. <p>Supportive Performance Metric(s):</p> <ul style="list-style-type: none"> – Number of County departments adopting best practices of the Green Business Program. (Conservation and Development) – Trainings and other information for County staff on climate change. (Conservation and Development) – Amount of pesticides applied to County properties. (Public Works, Health (IPM)) – Number of County facilities with an active integrated pest management plan. (Public Works, Health (IPM)) – .. 	<ul style="list-style-type: none"> – Interdepartmental Climate Action Task Force – Community-based organizations – Green Business Program – Contra Costa County Library <p>Applicability</p> <ul style="list-style-type: none"> – County operations – Businesses in unincorporated areas. <p>Time Frame</p> <p>Ongoing and midterm (by 2028)</p>

Commented [LG68]: Consider adding metric: Number of departments following the Environmentally Preferable Purchasing policy and following its contracting requirements.

Commented [LG69]: Consider adding: Report on progress regarding the creation of a carbon impact fee and efforts to establish a green bank.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> – Ensure County departments follow the County’s Environmentally Preferable Purchasing Policy and policy requirements are included in the contracting process. – Regularly review and revise the County’s purchasing and contracting programs as necessary to ensure consistency with the County’s sustainability and GHG reduction goals. (HS-A3.2) 		
<p>L-2: Continue to recognize the climate crisis as an emergency for Contra Costa County and make addressing climate change a top County priority.</p> <ul style="list-style-type: none"> – Continue to implement the 2020 Climate Emergency Resolution approved by the Board of Supervisors, including conducting periodic reviews and updates to the Resolution. – Consider climate vulnerabilities and associated equity effects as factors in the County’s planning and expenditures for infrastructure and services to increase resilience and reduce GHG emissions countywide. – Consider development standards for the disclosure of climate and equity effects and vulnerabilities in staff reports for all decisions by the Board of Supervisors when such disclosures are helpful and necessary. Explore modifying County processes and forms to include questions to ensure the proposed action is consistent with the 2024 CAP and equity goals. – Assess County programs, policies, operations, and projects (excluding stationary sources) for their contribution to achieving the County’s GHG emissions reduction goals and consistency with the 2024 CAP. – Disclose GHG emissions to a registry such as the Carbon Disclosure Project (CDP). 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> – Actions taken to implement Climate Emergency Resolution. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> – All County departments – Interdepartmental Climate Action Task Force – Community-based organizations – Local environmental groups <p>Applicability</p> <ul style="list-style-type: none"> – County operations <p>Time Frame</p> <p>Mid-term (by 2028)</p>

- Commented [LG70]:** Consider adding: Use the County’s lobbyists in Sacramento and Washington to address climate action policy barriers when identified.
- Commented [LG71]:** Question: Should the County be lobbying for a national (or State?) price on carbon policy?
- Commented [LG73]:** Add: Checklist to evaluate planning and infrastructure expenditures against climate vulnerabilities, equity concerns, resilience and GHG emissions.
- Commented [LG74]:** Add: Report on proposal to the Board of Supervisors to develop standards for climate equity impact disclosures in relevant staff reports for Board actions.
- Commented [LG72]:** Proposing even-year reviews.

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
Implementation Strategies: Contra Costa County will ensure it follows through to achieve the goals and actions in this Climate Action Plan.		
<p>IS-1: Monitor and report progress toward achieving Climate Action Plan goals on an annual basis.</p> <ul style="list-style-type: none"> - Assign responsibility for facilitating and supporting 2024 CAP implementation to the County's Department of Conservation and Development. - Identify key staff from each department responsible for supporting 2024 CAP implementation and updates for annual reporting and monitoring. - Continue to involve community-based organizations and other key stakeholders in reviewing and recommending 2024 CAP action items. - Continue to prepare an annual progress report on implementation of the recommended GHG emissions reduction strategies and progress toward the 2024 CAP goals. When information is available, provide updates on estimated GHG emissions reductions and current GHG emissions levels. - Monitor implementation of the Sustainability Fund for projects in County facilities - Use the 2024 CAP implementation and monitoring tool to track GHG benefits from 2024 CAP implementation and identify progress toward the 2024 CAP reduction goals. - Pursue refinements to improve the County permitting system and other systems as needed to support collection of 2024 CAP implementation data. - Work with Contra Costa Health on exploring, and if appropriate, developing health indicators related to climate change to help inform progress on current actions and effectiveness of adaptation strategies. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> - Preparation of Annual Report and presentation to Sustainability Commission and Board of Supervisors. (Conservation and Development) - Dedicated funding in annual budget for implementation of the 2024 CAP. (County Administrator) - Regularly maintained 2024 CAP tracking tool. (Conservation and Development) - Updates to County permitting system to support tracking of 2024 CAP implementation. (Conservation and Development) - Sustainability Fund progress report. (Public Works) 	<p>Potential Partners</p> <ul style="list-style-type: none"> - All County departments - Interdepartmental Climate Action Task Force - Sustainability Commission <p>Applicability</p> <ul style="list-style-type: none"> - County operations - Residents in unincorporated areas. - Businesses in unincorporated areas. <p>Time Frame</p> <p>Ongoing and near term (by 2026)</p>

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<p>IS-2: Continue collaborative partnerships with agencies and community groups that support Climate Action Plan implementation, with an emphasis on residents and community-based organizations from Impacted Communities.</p> <ul style="list-style-type: none"> – Participate in local and regional organizations that provide tools and support for energy efficiency, energy conservation, GHG emissions reductions, sustainable infrastructure development, adaptation, public information, and implementation of this 2024 CAP. – Enable effective partnerships to implement high-priority strategies from the 2024 CAP by working through established interagency collaborations and joint exercise of powers authorities and forming new arrangements of various types where necessary to be effective. – Provide input to partner agencies on policy barriers that need to be addressed at the State level. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> – Partnerships maintained. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> – All County departments – Interdepartmental Climate Action Task Force – Sustainability Commission – Agency partners – Community-based organizations <p>Applicability</p> <ul style="list-style-type: none"> – County operations – Residents in unincorporated areas. – Businesses in unincorporated areas. <p>Time Frame</p> <p>Near term (by 2026)</p>
<p>IS-3: Secure necessary funding to implement the Climate Action Plan.</p> <ul style="list-style-type: none"> – Identify funding sources and levels for reduction strategies as part of annual reporting. – Include GHG emissions reduction strategies in the capital improvement programs for County-owned and managed facilities and infrastructure, and other plans as appropriate. – Pursue local, regional, state, and federal grants to support implementation. – [REDACTED] 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> – Climate action integration into all department work plans and capital improvement program. (County Administrator, Public Works) – Number of grants and amount of funding being pursued, awarded, and managed. (Conservation and Development) – Funding provided for the Sustainability Fund. (County Administrator) 	<p>Potential Partners</p> <ul style="list-style-type: none"> – All County departments – Interdepartmental Climate Action Task Force – Agency partners <p>Applicability</p> <ul style="list-style-type: none"> – County operations – Residents in unincorporated areas. – Businesses in unincorporated areas.

Commented [LG75]: New action: Track and disseminate to appropriate departments and partners grant opportunities for CAP implementation

CAP STRATEGY AND IMPLEMENTATION ACTIONS	POTENTIAL IMPLEMENTATION PERFORMANCE METRICS AND LEAD DEPARTMENTS	POTENTIAL PARTNERS, APPLICABILITY, AND TIME FRAME
<ul style="list-style-type: none"> – Explore dedicated funding sources for 2024 CAP implementation, including from the Sustainability Fund or other revenue sources as needed. – Explore opportunities to allocate a portion of revenues from revenue-generating strategies in the 2024 CAP to its implementation. 		<p>Time Frame Ongoing and near term (by 2026)</p>
<p>IS-4: Continue to update the baseline emissions inventory and Climate Action Plan every five years.</p> <ul style="list-style-type: none"> – Prepare a GHG emissions inventory that shows GHG emissions after emergency conditions created by the COVID-19 pandemic are expected to have ended. – Update the 2024 CAP to incorporate new technologies, practices, and other options to further reduce emissions. (HS-A3.1) 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> – Updated GHG inventories every five years. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> – All County departments – Interdepartmental Climate Action Task Force <p>Applicability</p> <ul style="list-style-type: none"> – County operations – Residents in unincorporated areas. – Businesses in unincorporated areas. <p>Timeframe Mid-term (by 2028)</p>
<p>IS-5: Maintain and update the Climate Action Plan to allow for greater resilience.</p> <ul style="list-style-type: none"> – Coordinate, where possible, updates of the Climate Action Plan, General Plan Safety Element, and Local Hazard Mitigation Plan cycles to ensure plan alignment and coordination of climate mitigation and adaptation efforts. – Assess the implementation status and effectiveness of adaptation strategies. 	<p>Key Performance Metric(s):</p> <ul style="list-style-type: none"> – Progress on implementing GHG emissions reduction strategies, climate adaptation strategies, and general sustainability strategies. (Conservation and Development) 	<p>Potential Partners</p> <ul style="list-style-type: none"> – All County departments – Interdepartmental Climate Action Task Force <p>Applicability</p> <ul style="list-style-type: none"> – County operations – Residents in unincorporated areas. – Businesses in unincorporated areas.

Commented [LG76]: Proposing that inventories be updated much more frequently, ideally yearly, given the urgency and depth of what we need to accomplish.

Commented [LG77]: Proposing yearly.

WALNUT CREEK
WATERSHED
COUNCIL

April 7, 2024

Sent via email to: email@envisioncontracosta2040.org

Comments on the draft Contra Costa County 2045 General Plan

The Walnut Creek Watershed Council (Council) submits this comment letter on the draft Contra Costa County 2045 General Plan (draft Plan 2045). The Council is a volunteer-led 501(c)(3) organization that supports a healthy and sustainable Walnut Creek Watershed. The Walnut Creek Watershed is 146 square miles in size, includes parts or all of nine cities and towns, and is the largest watershed in the County.

The Council's principal focus in these comments is on the section of Element 7 (Conservation, Open Space, and Working Lands Element) that discusses Creeks, Wetlands and Riparian Areas. The Council, the Contra Costa County Flood Control and Water Conservation District (District), and the Contra Costa Resource Conservation District (RCD) are working together to create a Walnut Creek Watershed Restoration Plan. Part of that plan will involve the identification of potential restoration sites throughout the Walnut Creek Watershed.

The Council requests several changes in the draft Plan 2045. First, the language about creeks flowing into San Francisco and San Pablo bays should also reference creeks flowing into Suisun Bay. Alhambra Creek, Mt. Diablo Creek and Walnut Creek flow into Suisun Bay. The Delta is defined as ending just east of Suisun Bay into which both the San Joaquin and Sacramento Rivers flow. Since Suisun Bay is generally not considered part of the Delta, it needs to be separately mentioned.

The second change involves the map of watersheds in Contra Costa County in draft Plan 2045 (Figure COS-5 Watersheds, Waterbodies, Creeks and Rivers). This map appears to be derived from the maps in the Contra Costa Watershed Atlas (2004). However, those maps should be updated in their depiction of the Walnut Creek Watershed.

The Council has two requests regarding the mapping. The first is to include the other map from the Atlas that shows the major watersheds of the county, including the Walnut Creek Watershed (See *Contra Costa County Watershed Atlas* (2004), 5). The second is to insert a footnote that these maps are in the process of being updated with regard to the Walnut Creek Watershed and that a correct map will be included in the final General Plan 2045. Another part of the joint effort between the District and the Council is that it will include producing a new map of the Walnut Creek Watershed that is accurate.

The Council further requests that the section on Creeks, Wetlands and Riparian Areas include a recognition that the identification of potential restoration sites is important to creating healthier watersheds. Together with the District and the RCD, the Council has launched an effort called "Envisioning a Healthier Watershed".¹ One of our goals is to identify high and medium priority restoration projects to create a healthier watershed. The identification of these sites will guide restoration activities in the watershed for the next 20-30 years. We know there are many more potential restoration sites than we are identifying in this initial effort. We anticipate

¹ <https://www.wcwatershed.org/watershed-restoration-plan.html>

completing the initial identification of high-and medium-priority restoration sites by December 2024. We believe that the County General Plan should establish the goal of a healthier watershed for every watershed in the County.

In another section, the Draft General Plan contains action item COS-A4.1. This action is important, but the Council recommends that the language be modified to include support for implementing watershed restoration plans, with specific reference to the Walnut Creek Watershed Restoration Plan. Draft plan 2045 should encourage the development of watershed restoration plans throughout the County.

The Council is also concerned with the language limiting the scope of several policies to "natural watercourses." We recommend using the term "creeks" instead of "natural watercourses,". Many of the creeks in the Walnut Creek Watershed are in natural condition (*Contra Costa County Watershed Atlas* (2004), 80). Even the sections that have been channelized still provide significant habitat value and are important wildlife corridors. For example, parts of Walnut Creek, San Ramon Creek, Pine Creek, Grayson Creek, Las Trampas Creek, and the Clayton Drain have been modified yet still provide natural habitat value, wildlife corridors, and other ecosystem benefits (e.g., mitigation of fire and flood risks). Utilizing the term "creeks" would be inclusive of both natural and earthen channels providing significant ecological values, and it would also be consistent with other planning and regulatory documents.

While draft Plan 2045 mentions the County's 50-Year Plan (which the FCD and the Board of Supervisors approved in 2009), it does not include any language or any goals, policies, actions to implement the 50-Year Plan. The Council recommends adding language to implement the 50-Year Plan by the end of the year 2045.

The Plan should not just apply to unincorporated areas of the county; it should also apply to any area under the jurisdiction of the District, even if it is in an incorporated area of the county. Together with the language that the plan applies to all creeks, this will make it clear that one goal of the District is to pursue more naturalized creeks and wetlands.

Among other actions needed to create a healthier watershed are the removal of barriers to fish passage (e.g., drop structure #1 on Walnut Creek and similar barriers to fish passage on Grayson Creek), the promotion of the replacement of non-native vegetation in riparian areas with native vegetation, and a program to remove invasive species (e.g., *Arundo donax*, English Ivy, Tree of Heaven) from all watersheds. These need to be specifically addressed in the final General Plan 2045. The General Plan should also include a requirement to plant native trees along the upper banks of waterways to provide shade for cooling of the water to improve habitat for wildlife and fish species.

Thank you for the opportunity to comment on the Draft General Plan.



Bob Simmons
President
Walnut Creek Watershed Council
Bobsimmons2866@gmail.com

California Department of Transportation

AERONAUTICS PROGRAM
DIVISION OF TRANSPORTATION PLANNING
P.O. BOX 942873, MS-40 | SACRAMENTO, CA 94273-0001
(916) 654-4959
www.dot.ca.gov



April 8, 2024

Will Nelson
Principal Planner
Contra Costa County Department of Conservation and Development
30 Muir Road
Martinez, CA 94553

Electronically Sent <will.nelson@dcd.cccounty.us>

Dear Mr. Nelson,

The California Department of Transportation, Caltrans Aeronautics has reviewed the Draft Environmental Impact Report for Contra Costa County 2045 General Plan and Contra Costa County Climate Action Plan 2024 Updates (aka Envision Contra Costa). One of the goals of the California Department of Transportation, Aeronautics Program, is to assist cities, counties, and Airport Land Use Commissions (ALUC) or their equivalent, to understand and comply with the State Aeronautics Act pursuant to the California Public Utilities Code (PUC), Section 21001 et seq. Caltrans encourages collaboration with our partners in the planning process and thanks you for including the Aeronautics Program in the review of the Draft EIR.

Contra Costa County contains two public general aviation airports: Buchanan Field Airport and Bryon Airport. The Contra Costa County Airport Land Use Compatibility Plan (ALUCP) adopted by the Contra Costa County Airport Land Use Commission sets the compatibility criteria applicable to local agencies in the preparation or amendments of land use plans and ordinances. An ALUCP is crucial in minimizing noise nuisance and safety hazards around airports while promoting the orderly development of airports, as declared by the California Legislature.

Per the California Public Utilities Code Section 21001 et seq. relating to the State Aeronautics Act, Section 21676(b) prior to the amendment of a general plan...within the planning boundary established by the airport land use commission pursuant to Section 21675, the local agency shall first refer the proposed action to the commission. If the commission determines that the proposed action is inconsistent with the commission's plan, the referring agency shall be notified. Any proposed development in the defined safety zones, therefore, must adhere to the safety criteria and restrictions defined in the Airport Land Use Compatibility Plan(s) adopted by the ALUC pursuant to the PUC, Section 21674.

Mr. Nelson, Principal Planner
April 8, 2024
Page 2

Caltrans Aeronautics acknowledges and commends Goal TR-7: Safe and viable general and commercial aviation activities in Contra Costa County and its subsequent policies which aim to ensure that development is compliant with airport land use requirements.

If you have any questions or need additional information, please contact me by email at tiffany.martinez@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Tiffany Martinez". The signature is written in a cursive, flowing style.

Tiffany Martinez
Aviation Planner
Caltrans Aeronautics Program

c: State Clearinghouse <state.clearinghouse@opr.ca.gov>

April 8, 2024

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

RE: General Plan, Climate Action Plan, Environmental Impact Report

Comments submitted by email to: email@envisioncontracosta2040.org

Dear Chair Glover, Board of Supervisors, and Department of Conservation and Development:

We submit these comments primarily to describe the inherent risks in hydrogen and biomethane infrastructure development as part of the County’s climate commitments, and outline other improvements. While our comments focus on these issues, we also uplift comments submitted by 350 Bay Area and others on ways that the General Plan, Climate Action Plan, and related Environmental Impact Report can and should be more protective of environmental justice communities.

We are committed to working with the County as stewards of a long-awaited shift away from an extractive fossil-fuels based economy that will dramatically improve air quality for fenceline communities and reduce the harms of the climate crisis for the whole County. We should use this opportunity to grow a regenerative and collective economy that centers the needs of our fenceline communities throughout, supporting residents and workers along the way, in a just and equitable transition. As the County, state and country develop and implement policies that recognize the climate crisis and support a decarbonized grid, we are reminded that: “Transition is inevitable. Justice is not.”¹

I. We support, if amended, the County’s many community-rooted climate solutions.

The County proposes a number of laudable policies that advance a just and equitable transition. Other policies described in the General Plan and Climate Action Plan would benefit from additional safeguards to ensure that the policies are equitable and do not exacerbate existing environmental justice inequities.

Building Decarbonization

This emphasis on equity is reflected in BE-2 where the Country describes its intent to develop programs to support residential electrification.² By prioritizing those with the least means to bring

¹ “Just Transition,” Movement Generation, <https://movementgeneration.org/justtransition/>.

² “Climate Action Plan,” Contra Costa County, October 2023, https://envisioncontracosta2040.org/wp-content/uploads/2023/10/CoCoCounty-2024CAP-PublicDRAFT-10-10-23_Final.pdf, [hereinafter “Climate Action Plan”] at 77 (“Ensure County-led and supported retrofit programs incentivize and prioritize conversion of buildings built before 1980 and emphasize assistance to

decarbonization into their own homes, the County is helping avoid a possible catastrophe where only those who could not afford to get off the natural gas system are those who are left to pay for the maintenance, repair and crises of an aging infrastructure system. On this program and others, even where a community-based organization (“CBO”) may lack technical expertise or physical capacity to implement electrification projects inside residents’ homes, the County should still partner with CBOs who have trusting relationships in communities centered with these policies as a way to establish trust and promote participation through holding community meetings and demonstrations, relying then on additional organizations with capacity to effectuate the program.

We encourage the County to connect with the City of Los Angeles Climate Emergency Mobilization Office (CEMO) to understand the recommendations of the City of Los Angeles *Report on Equitable Building Decarbonization* and its underlying community engagement process.³ Additionally, we encourage the County to incorporate policies to protect tenants as recommended in the report *Decarbonizing California Equitably: A Guide to Tenant Protections in Building Upgrades/Retrofits Throughout the State*.⁴

Carbon Sequestration

NI-4 describes the County’s goal to use working lands for carbon sequestration strategies to achieve net carbon neutrality. Our organizations celebrate the County’s approach to sequestration in that it relies on natural and working lands through trees and other green infrastructure, rather than the untested, risky technologies promoted by fossil fuel companies to otherwise store carbon via underground injection.⁵ At the same time, we should provide explicit guidance on how to implement the important principle that the County itself writes: “Ideally, the community will reduce its own emissions as much as possible [by other methods], and then balance out the remainder [with carbon capture].”⁶ This goal is also reflected in AB 1279 (Muratsuchi), which states “Prioritizing direct emission reductions will help California to meet both its air quality standards and net zero greenhouse gas emissions” given “the findings from numerous studies recognizing the benefits, risks, and uncertainties around the use of carbon dioxide removal technologies and carbon capture, utilization, and storage technologies.”⁷

owners of properties that are home to very low-, low-, and moderate- income residents or located in Impacted Communities, as permitted by available funding.”).

³ Emma French, *Report on Equitable Building Decarbonization: Equity Focused Policy Recommendations for the City of Los Angeles*, Prepared for the Climate Emergency Mobilization Commission and the Climate Emergency Mobilization Office (CEMO), Sept. 15, 2022, <https://static1.squarespace.com/static/6425c19e4d543f40fa406953/t/65a08499faadfe0e9652ec40/1705018528390/Report-on-Equitable-Building-Decarbonization-FINAL-September-15-2022.pdf>.

⁴ Strategic Actions for a Just Economy (SAJE), October 2023, <https://www.saje.net/wp-content/uploads/2023/09/Decarbonizing-California-Equitably-Report-1.pdf>.

⁵ Climate Action Plan, at 100. See also “Healthy Lands, Healthy People: A Carbon Sequestration Feasibility Study,” Contra Costa County, October 2023, contracosta.ca.gov/DocumentCenter/View/79768/Healthy-Lands-Healthy-People-Final-Report.

⁶ Climate Action Plan, at 15.

⁷ AB 1279 (2022). <https://legiscan.com/CA/text/AB1279/id/2606946>.

First, we must clarify that these reductions should be the result of policies and practices that support direct reductions in consumer demand as well as policies or permitting decisions that support direct limitations on emissions that result in declining emissions. In short, ensuring less or no emissions are generated in the first place. The County should be explicit to signal that industrial carbon capture and sequestration (CCS) technology, which is unproven at scale and encourages continued investment in non-carbon but still health-harming polluting emissions, is not considered such a reduction strategy. We should also make explicit that industrial carbon dioxide removal (CDR) should be a backstop rather than the primary driver of carbon neutrality in the County. The County should collaborate with the Air District and further prioritize strategies that also improve air quality in areas with the worst cumulative air pollution impacts.

The County's goals in NW-1 to increase composting of natural waste, similarly, move us in the right direction, but need to be more protective of impacted communities. While proper composting of natural waste is preferable to increased landfill reliance, the Plan is silent on mitigation measures that would protect the communities that surround natural waste composting facilities from increased onsite processing.⁸ The County should develop policies that protect local air, water and soil quality and nearby residents from odor impacts in tandem with its natural waste composting goals. Additionally, as the County encourages more proper processing of organic waste, it needs to be careful to not encourage the creation of more organic waste, and instead proactively minimize waste. This is especially the case if the County intends to capture natural gas from recovered organic waste as to not create incentives to produce more underlying organic waste.⁹ If that County does pursue that waste-to-gas implementation strategy, it should safeguard against fossil gas expansion alongside development of those waste-based technologies so that the resultant product is not a greenwashed fossil fuel blend product.

Renewable Energy

Finally, one of the most promising components of the Climate Action Plan are the County's plans to increase use and generation of electricity from renewable sources in BE-3. We are concerned, however, that while the 2030 goals suggest rapid progress in this decade, there is a large and unexplained drop off in a number of the 2045 projections, namely that there would be zero related greenhouse gas emission reductions for the 2030-2045 period.¹⁰ Instead, we ask that the County only continue to increase and accelerate its renewable electricity sourcing efforts over this period. If the County sees this as infeasible, we ask that the County explain that projection and its underlying analysis in greater detail than the Plan does now.

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⁸ Climate Action Plan, at 83.

⁹ Climate Action Plan, at 98.

¹⁰ Climate Action Plan, at 78.

II. Biomethane is a false solution that endangers public health both in its creation and in its use.

The County forecasts that biomethane will be blended in pipelines as a replacement to natural gas.¹¹ Instead, the County should develop and pursue strategies that do not rely on biomethane, which we call a false solution: though it may appear as an appropriate replacement for natural gas at first glance, biomethane poses too many public health risks to be included in the Climate Action Plan.

Biomethane's most ample local supply is the megadairies of the Central Valley; the manure from cows at these dairy farms feed methane digesters that then yields biomethane, all the while increasing reliance on the heavily pollutive dairy industry, further endangering the low-income farmworker communities that surround these pastorally-cloaked industrial operations.¹² The Central Valley's poor air quality is made worse yet by methane digesters which emit particulate matter and ammonia, yielding the highest ammonia concentrations in the state.¹³ Megadairies imperil the drinking water that farmworker communities rely on, elevating nitrate levels as a result of the manure seeping into groundwater, and the odor impacts are as awful as can be easily imagined.¹⁴ Contra Costa County is home to four oil refineries and knows the deleterious environmental and public health effects of the state relying on the region to produce energy for everyone else; the County should not now shift that unjust - and unnecessary - burden to Tulare County and the rest of the San Joaquin Valley.

Much of the evidence to support these warnings have been aggregated not only by environmental justice groups who have always opposed these false solutions, but now increasingly environmental groups and academics who originally supported the creation of the Low Carbon Fuel Standard like the Union of Concerned Scientists (UCS) and the Natural Resources Defense Council (NRDC) have joined in the chorus of warnings.¹⁵ But, given state policy inertia, distorted accounting related to the harms and benefits of biomethane production and use continues to favor this especially problematic source over other investments

¹¹ Climate Action Plan, at 64, B-45.

¹² Tony Briscoe, "Why some people think California's cow manure methane plan stinks," *Los Angeles Times*, Dec. 5, 2023,

<https://www.latimes.com/environment/story/2023-12-05/californias-cow-manure-methane-plan-is-making-people-angry> [hereinafter "Briscoe biomethane article"].

¹³ Briscoe biomethane article; Michael Holly et. al., "Greenhouse gas and ammonia emissions from digested and separated dairy manure during storage and after land application," *Agriculture, Ecosystems & Environment* 239, Feb. 15, 2017, 410-419,

<https://www.sciencedirect.com/science/article/pii/S0167880917300701>.

¹⁴ Rebecca Spector, "The Dairy Digester Dilemma: A False Climate Solution," Center for Food Safety, Oct. 4, 2021,

<https://www.centerforfoodsafety.org/blog/6457/the-dairy-digester-dilemma-a-false-climate-solution>.

¹⁵ "Recommendations for Updates to the Low Carbon Fuel Standard," Natural Resources Defense Council, June 14, 2023, <https://ww2.arb.ca.gov/form/public-comments/submissions/4036>; Jeremy Martin, "Something Stinks: California Must End Manure Biomethane Accounting Gimmicks in its Low Carbon Fuel Standard," Union of Concerned Scientists, February 15, 2024, <https://blog.ucsusa.org/jeremy-martin/something-stinks-california-must-end-manure-biomethane-accounting-gimmicks-in-its-low-carbon-fuel-standard/>.

to be funded by the state's Low Carbon Fuel Standard.¹⁶ The effects of perverse incentives created by runaway policies due for for corrections should not be taken as evidence that biomethane is a reliable, much less responsible, energy source for the future.

The California Energy Commission studied replacing in-home natural gas with biomethane and found that combustion of biomethane was just as toxic, if not more toxic, than natural gas, including on DNA damage and increasing cancer risks.¹⁷ Even if biomethane is restricted to industrial clusters¹⁸ (or even just to wastewater plants¹⁹), that merely, and unacceptably, directs the public health dangers towards industrial workers.

Taken together, the environmental injustices in the production of biomethane at megadairies, the shoddy calculations and unreliable financial incentives that have propped up this industry, and the end-use public health risks all lead us to urge the County to reject biomethane as a component of the Climate Action Plan. Since the current draft of the Climate Action Plan relies on biomethane to achieve some of its greenhouse gas emissions, the County needs to develop alternative methods to accomplish those same emissions. To that end, we believe that reducing vehicle miles traveled and increasing public transportation infrastructure is the most efficient strategy, reducing energy needs and greenhouse gas emissions as effectively as possible in the greatest emitting sector.

III. While just a minor component of the Climate Action Plan, the County should not rely on hydrogen as a future fuel source.

We are glad to see little reliance placed on hydrogen as a fuel source in the Climate Action Plan. The few references made are in the context of transportation and biomethane. The section above addresses the latter. On transportation, the County's own words in the Climate Action Plan point towards the strategy we encourage: "Gasoline and diesel-fueled vehicles in particular release more carbon dioxide into the atmosphere than vehicles that use electricity or hydrogen fuels, even when accounting for how the electricity or hydrogen is generated."²⁰ While this two-strategy approach mirrors state policy,²¹ hydrogen production could easily entrench existing environmental inequities rather than promote a Just Transition.

¹⁶ Kiki Velez, "CARB Must Reform LCFS Program to Meet Climate Goals," Natural Resource Defense Council, Aug. 23, 2023, <https://www.nrdc.org/bio/kiki-velez/carb-must-reform-lcfs-program-meet-climate-goals-0>; see e.g., Jeff St. John, "Critics question assumptions at core of Low Carbon Fuel Standard," Canary Media, Mar. 14, 2024, <https://www.canarymedia.com/articles/transportation/critics-question-assumptions-at-core-of-california-low-carbon-fuel-program>

¹⁷ "Air Quality Implications of Using Biogas to Replace Natural Gas in California," California Energy Commission, May 2020, <https://www.energy.ca.gov/sites/default/files/2021-05/CEC-500-2020-034.pdf>.

¹⁸ Climate Action Plan, at B-30.

¹⁹ Climate Action Plan, at 83.

²⁰ Climate Action Plan, at 92.

²¹ See, e.g., Executive Order N-72-20, Sep. 23, 2020, <https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf>; "2022 Scoping Plan for Achieving Carbon Neutrality," California Air Resources Board, Dec. 2022, <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf> [hereinafter "2022 CARB Scoping Plan"], at 189-192.

The 2022 CARB Scoping Plan projects a precipitous decline in in-state demand for gasoline and petroleum-based products by 2045.²² It further muses that “existing refineries could be repurposed to produce [...] hydrogen.”²³ That would be a calamitous environmental justice failure. As the County knows, “[t]he differences in criteria pollutant emissions between [...] processing of petroleum-based feedstocks and renewable feedstocks is small, as renewable fuels processing operates within the same range of operating parameters as petroleum-based production.”²⁴ The County must commit to a future where oil refineries are decommissioned rather than one that prolongs reliance on the oil industry, defers environmental remediation of toxic sites, and endorses existing pollution burdens that disproportionately fall on low-income communities of color.

Hydrogen can be produced from processes other than existing refineries, of course, but there is no model we endorse. So-called “green” hydrogen, where renewable energy is the source of energy for electrolysis (a process by which hydrogen is extracted from water molecules) is a misnomer, willfully obscuring the inefficiency and loss of 50-80% of the energy inherent in producing hydrogen via electrolysis and then from combusting hydrogen to generate electricity again.²⁵ Instead, we encourage maximization of renewable energy sources that feed directly into the grid to meet consumers’ needs, including in the transportation sector and accordingly encourage the County to pursue electric transportation options as it plans for the energy transition.

IV. Climate planning requires inclusion of local refineries and other large industrial facilities under County jurisdiction.

Notably missing from the Climate Action Plan are the largest sources of industrial sector greenhouse gas emissions in the state: oil refineries. These oil refineries also produce the very fuels that make the transportation sector the largest source of greenhouse gas emissions in the state. While addressing the cumulative and disproportionately harmful pollution burden that falls on refinery fenceline communities, planning for a community-and-worker-centered managed decline of greenhouse gas emissions from oil refineries will be necessary to meet county, state, and global climate goals.

The County has excluded from its greenhouse gas inventory - and from the rest of the Climate Action Plan - large industrial facilities, including oil refineries under a theory that “[t]hese

²² 2022 CARB Scoping Plan, at 100-110.

²³ 2022 CARB Scoping Plan, at 191.

²⁴ “Rodeo Renewed Project Draft Revised Environmental Impact Report,” Contra Costa County, Oct. 2023,

<https://www.contracosta.ca.gov/DocumentCenter/View/80824/Phillips-66-Rodeo-Renewed-Project-Draft-Revised-EIR-October-24-2023>, at 16.

²⁵ Jeff St. John, “The problem with making green hydrogen to fuel power plants,” *Canary Media*, Oct. 10, 2023,

<https://www.canarymedia.com/articles/hydrogen/the-problem-with-making-green-hydrogen-to-fuel-power-plants>.

facilities are regulated by the State and BAAQMD, and the County does not have direct control over their operations.”²⁶ First, while the State and Air District do regulate these facilities (and many if not all of the other contemplated regulated parties under the Climate Action Plan), so does the County; the County’s own Industrial Safety Ordinance uniquely applies to two refineries and related facilities within its jurisdiction.²⁷ Second, the County’s involvement as the lead agency for analysis and review under the California Environmental Quality Act (“CEQA”) for two biofuel conversion projects at local refineries, with accompanying permit decisions, further evinces the County’s role in regulating and controlling these facilities.²⁸ As the County wrote in the 2021 Draft Environmental Impact Report for the Martinez Refinery Renewable Fuels Project, “The Project also requires discretionary action by Contra Costa County (County), wherein the County has the authority to use its judgment in deciding whether or how to carry out or approve the Project. [...] As the public agency with primary land use authority over the proposed Project, the County is the ‘lead agency’ overseeing and administering the CEQA environmental review process.”²⁹ The County should not seek to relinquish its broad discretionary authority over these facilities or advance a narrative that that regulation of them is solely in the purview of state agencies; the County has a responsibility here.

At the very least, the County should meet the bare examples of Richmond and Los Angeles and contextualize its own greenhouse gas emissions inventory and reduction plans with side-by-side comparisons of totals that include the emissions from the large industrial facilities, including oil refineries.³⁰ Both cities pass on specific emissions reduction goals for refineries, but do report the totals; Los Angeles also does offer that it will “[s]upport the implementation of refinery and heavy duty industry emissions reduction plans,” including leak detection and repair initiatives and implementing control technologies.³¹ The California Air Resources Board released 2022 emissions data late last year to support that will support this exercise.³²

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²⁶ Climate Action Plan, at B-17.

²⁷ “Industrial Safety Ordinance,” Contra Costa Health, <https://www.cchealth.org/health-and-safety-information/hazmat-programs/industrial-safety-ordinance>.

²⁸ “Phillips 66 Rodeo Renewed Project,” Contra Costa County, last updated Jan. 5, 2024, <https://www.contracosta.ca.gov/7945/Phillips-66-Rodeo-Renewed-Project>; “Martinez Refinery Renewable Fuels Project,” Contra Costa County,

²⁹ “Martinez Refinery Renewable Fuels Project Draft Environmental Impact Report,” Contra Costa County, Oct. 2021, <https://www.contracosta.ca.gov/DocumentCenter/View/72957/Martinez-Refinery-Renewable-Fuels-DEIR-Vol-1-Complete-DEIR>, at 1-1.

³⁰ “Climate Action Plan,” City of Richmond, October 2016, ci.richmond.ca.us/DocumentCenter/View/40636/CAP-combined?bidId=, at 27; “L.A.’s Green New Deal, Sustainability Plan 2019,” City of Los Angeles, 2019, plan.lamayor.org/sites/default/files/pLAN_2019_final.pdf, [hereinafter “Los Angeles Climate Action Plan”] at 91 (noting that 2015 greenhouse gas inventory data included large industrial facilities, including petroleum refineries, and they are included in the City’s industrial emission goals in the box at the top of the page).

³¹ Los Angeles Climate Action Plan, at 91.

³² “Annual Summary of GHG Mandatory Reporting,” California Air Resources Board, Nov. 6, 2023, <https://ww2.arb.ca.gov/sites/default/files/classic/cc/reporting/ghg-rep/reported-data/2022-ghg-emissions-2023-11-06.xlsx>.

Thank you for the opportunity to comment on the Climate Action Plan. We look forward to supporting and celebrating the County's many successes as it plans for this energy transition, with justice at the heart of it. To that end, we are requesting that we set up a meeting with your team so that we can collaborate on language that reflects our suggestions. Please contact us with any questions via email at conniecho@apen4ej.org and kerry@cbeval.org.

Sincerely,

Connie Cho
Just Transition Policy Strategist
Asian Pacific Environmental Network

Emma Ishii
Local Policy Coordinator
Asian Pacific Environmental Network

Kerry Guerin
Attorney & Just Transition Fellow
Communities for a Better Environment



Friends of Pleasant Hill Creeks

April 8, 2024

Contra Costa County Department of Conservation and Development
Via Electronic Mail: email@envisioncontracosta2040.org

RE: Draft Contra Costa County 2045 General Plan

Dear Department of Conservation and Development:

Friends of Pleasant Hill Creeks (FPHC) is a nonprofit organization that works with the community to protect and restore Pleasant Hill's creeks. We respectfully submit the following comments on the draft Contra Costa County 2045 General Plan.

Grayson Creek Watershed: FPHC's primary focus area is the Grayson Creek Watershed, also referred to as the Grayson-Murderer's Watershed. Grayson Creek is a natural creek in Contra Costa County that rises in the Briones Hills, flows through Lafayette, Pleasant Hill, and Pacheco, connects with Walnut Creek and then flows into Suisun Bay. Most of the creek channels in the Grayson Creek Watershed are in natural or earthen condition (*Contra Costa County Watershed Atlas* (2004), 81), and as such they provide significant riparian habitat and wildlife corridors. Grayson Creek is a valued resource for our communities that provides multiple benefits including ecological, flood protection, recreational, and educational benefits. FPHC volunteers have documented more than 100 species of native California birds as well as river otters, beavers, and Chinook salmon in the Grayson Creek riparian corridor. Since 2017, many volunteers have engaged in creek cleanups, water quality monitoring, and wildlife surveys. As Grayson Creek is a major tributary to Walnut Creek, FPHC is a member of the Walnut Creek Watershed Council (WCWC). FPHC is currently participating in the development of the Walnut Creek Watershed Restoration Plan, a joint initiative of the WCWC, the Contra Costa County Flood Control and Water Conservation District (FCD) and the Contra Costa Resource Conservation District (RCD).

Comments and Recommendations on Draft Contra Costa County 2045 General Plan:

We appreciate the goals, policies, and actions in the draft 2045 General Plan that support the protection and restoration of our creeks and watersheds. Please see the attached chart (Appendix A) for specific comments and recommendations.

Please feel free to contact us with any questions, and thank you for the opportunity to comment.

Sincerely,
Heather Rosmarin
Co-Founder, Friends of Pleasant Hill Creeks
pleasanthillcreeks@gmail.com

cc: Supervisor Ken Carlson
City Council of Pleasant Hill
Contra Costa County Flood Control and Water Conservation District
Contra Costa Resource Conservation District
Walnut Creek Watershed Council

25A Crescent Drive #245, Pleasant Hill, CA 94523 | www.pleasanthillcreeks.org | @PHcreeks
Friends of Pleasant Hill Creeks is a Project of Social and Environmental Entrepreneurs (SEE) a non-profit public charity exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code.

Appendix A
Comments and Recommendations on Draft Contra Costa County 2045 General Plan
(Bolded underline text indicates recommended revision)

Plan Reference	Comments & Recommendations
7-3	<p>We strongly support Goal COS-1: “Preserved open space for environmental protection, resource management and production, recreation, scenic value, and climate resilience and adaptation.”</p> <ul style="list-style-type: none"> • Please add a policy stating that it will be a priority to acquire, protect, and maintain open space adjacent to creeks and riparian corridors. This will facilitate restoration activities in alignment with Goal COS-5 as well as the 50-Year Plan “From Channels to Creeks,” adopted by the Board of Supervisors and FCD in 2009.¹ • Re COS-A1.1: Please include creek and watershed stewardship groups such as the Walnut Creek Watershed Council in the annual staff-level meetings to review current and planned efforts to protect and maintain open space.
7-13 ff	<p>We strongly support Goal COS-4: “Preserved and enhanced ecological resources and wildlife habitat.”</p> <ul style="list-style-type: none"> • Re COS P4.4: Please note that creeks, including channelized creeks that flow through urbanized areas, provide vital habitat and wildlife migration corridors throughout the county. • Re COS-P4.9: We strongly support reestablishment of native fisheries to the county’s streams. Salmonids such as Chinook salmon have been documented in Walnut Creek and Grayson Creek, but they are currently unable to complete their natural life cycle due to barriers to fish passage and other challenges. Reestablishing native fisheries will require addressing these challenges. Please add an action to work with state and federal agencies and stewardship groups to identify and, where feasible, address barriers to fish passage and other challenges to fish survival. • Re COS-A4.1: We strongly support ecological inventories and would be pleased to submit data to this process. Please notify Walnut Creek Watershed Council and Friends of Pleasant Hill Creeks of opportunities to contribute.
7-17	<p>We strongly support Goal COS-5: “Protected and restored natural watercourses, riparian corridors, and wetland areas that improve habitat, water quality, wildlife diversity, stormwater flows, and scenic values.”</p> <ul style="list-style-type: none"> • The term “natural watercourse,” which is used multiple times in the draft 2045 General Plan, is undefined. Please use the term “creeks” instead of “natural watercourses.” The term “creeks” is consistent with the title of the Plan section “Creeks, Wetlands, and Riparian Areas” as well as with other relevant planning and regulatory documents, and we believe it is the more appropriate term for the reasons provided below. This recommended revision applies to COS-5, COS-P5.2, COS-P5.5, COS-P5.6, and COS-P5.7. • Most of the creeks in the Grayson Creek Watershed, as well as the Walnut Creek Watershed, are in natural condition (<i>Contra Costa County Watershed Atlas</i> (2004), 80-81), and many of those that have been channelized continue to serve as vital riparian corridors. In our view, all creeks (and their tributaries) should be considered ecologically significant resources because they provide natural habitat value, wildlife corridors, and other ecosystem services (e.g., mitigation of fire and flood risks) even if they have been modified. For example, in Pleasant Hill, an avian biodiversity survey of two sections of Grayson Creek that include earthen channels documented more than 100 species of native and migratory California birds. (See attached <i>Grayson Creek Bird Survey Species List</i>.) We also recognize the importance of restoring those sections of creek that have been significantly modified with concrete channels and drop structures, particularly on Walnut Creek, which is why we strongly support the

¹ <https://www.contracosta.ca.gov/DocumentCenter/View/6853/50---Year-Plan-3-20-09-BOS-compressed-PDF?bidId=>

	implementation of the 50-Year Plan and the development of the Walnut Creek Watershed Restoration Plan.
7-17	Introductory paragraph of “Creeks, Wetlands, and Riparian Areas” should reference creeks. <ul style="list-style-type: none"> • Please revise: “Contra Costa County hosts abundant aquatic habitat through its freshwater and coastal salt marshes, mud flats, inland wetlands, creeks, and riparian vegetation.”
7-17	Second paragraph should reference Suisun Bay. <ul style="list-style-type: none"> • Please revise: “...many creeks, streams, and other drainages ... ultimately drain into San Francisco Bay, San Pablo Bay, Suisun Bay, and the Delta.”
7-17	The draft 2045 General Plan references the FCD’s 50-Year Plan, but does not include specific policies or actions to implement it. <ul style="list-style-type: none"> • As part of Goal COS-5, please add a policy to support implementation of the 50-Year Plan. • Suggested implementation actions include: (i) Provide regular updates on progress of the 50-Year Plan; (ii) Identify and pursue funding opportunities for implementation of the 50-Year Plan; and (iii) Identify and pursue opportunities to acquire, protect, and maintain open space for the implementation of the 50-Year Plan.
7-18	Figure COS-5 does not show the county’s major watersheds, including the Walnut Creek Watershed, the largest in the county. Instead, Figure COS-5 appears to be a map of subwatersheds. The 2045 General Plan should include additional maps to inform the public and guide policy makers. <ul style="list-style-type: none"> • Please add map of the county’s major watersheds. See <i>Contra Costa County Watershed Atlas</i> (2004), 5, and <i>Contra Costa Watersheds Stormwater Resources Plan</i> (2019), Fig. 4-3.² • Please add map of the creeks of Contra Costa County. See <i>Contra Costa County Watershed Atlas</i> (2004), 14, and <i>Contra Costa Watersheds Stormwater Resources Plan</i> (2019), Fig. 4-1. • Since the atlas of the county’s watersheds has not been updated since 2004, please add an action to update the <i>Contra Costa County Watershed Atlas</i>. Please note that the WCWC and FCD are in the process of preparing an updated map of the Walnut Creek Watershed, which will be shared with the Department of Conservation and Development as well as other relevant agencies. • We also recommended adding in this element or in the PFS element, a map showing the flood control system that is maintained by the County.
7-19	It is not clear what the * means after some of the policies and actions. Please clarify what the * means.
7-19-20	We support the policies and actions in this section with the following recommended revisions and additions. <ul style="list-style-type: none"> • COS-P5.2: Consistent with Goal COS-5 and the 50-Year Plan, please revise to “and whenever possible restore and enhance ... creeks, floodplains and riparian habitat.” A creek that has been channelized can also be restored or enhanced. • COS-P5.5: Please revise: “Acquire deeded development rights to setback areas surrounding wetlands, floodplains, and creeks to ensure preservation of the resource and protect adjacent improvements.” • COS-P5.6: Please revise: “Require increased setbacks for animal-handling uses whenever necessary to protect creeks, wetlands, riparian habitat, or erosion-prone soils...” • COS-P5.7: Please revise: “Allow encroachments into required setback areas along creeks and wetlands for the purpose of constructing low-impact public improvements or public-serving amenities, such as foot-bridges, trails, and nature viewing areas, if a qualified

² <https://www.cccleanwater.org/userfiles/kcfinder/files/CCW%20SWRP%20Main%20%2B%20App%20A.pdf>

biologist confirms that the additional infrastructure / amenities are compatible with the protection of ecological values.”

- **COS-A5.1:** This inventory should include creeks and riparian corridors because the removal of invasive species and revegetation with native plants can reduce climate-related risks of fire and flooding.
- **COS-A5.3:** Landscaping within a creek setback should be limited to native California species.
- **COS-A5.5.** We strongly support expanding the application of the county’s creek setback requirements; however, the creek setbacks identified in Title 9 are insufficient. Significant setbacks (at least 50 feet from the top of the creek bank) should apply to all creeks regardless of their current condition. These setbacks should apply to all new development and when approvals are being sought for improvement or modification of existing developed areas. The County has committed in its 50-Year Plan to replacing infrastructure that has met its design life with a more natural solution. However, these natural solutions cannot be implemented without space to allow a more natural function of a creek or tributary. Creeks, tributaries, and all waterways are dynamic systems that require space to meander, grow vegetation, accumulate dead vegetation, and permit other processes that allow viable habitat to form, provide flood conveyance, scenic resources, climate resilience, and other valuable functions that our waterways provide. In the past, in urban parts of the County, sections of creeks and tributaries have been modified, channelized, or piped. Today we see the error in that methodology through loss of vital biological systems, community connection to our creeks, and costly maintenance. It is important not to repeat the mistakes of the past. Increased setbacks will not only help achieve the county’s environmental protection and restoration goals, they will also help improve stormwater conveyance, increase climate resilience, and reduce flood risk both for existing homes and businesses as well as for new sustainable development in our communities. The County’s draft 2045 General Plan and the 50-Year plan set forth admirable goals and a framework for change. Expanded creek setbacks are necessary for any kind of true change in the future.
- **We therefore request that the draft 2045 General Plan include a policy to establish, at a minimum, a 50-foot creek setback regardless of current condition so that future restoration may be possible. Further we request that a study be performed within the next five years to establish biologically sound setbacks for creeks, including for urban creeks, that will allow as much natural function as possible.** Creek and watershed stewardship groups should be involved in this study.
- **Please add a new policy** to require new public infrastructure and private development projects to plant only native California species along creeks and riparian corridors.
- **Please add a new policy** to acquire development rights and funding to facilitate restoration of creek, wetlands, and riparian areas in alignment with the 50-Year Plan and other county-involved watershed restoration plans and programs, such as the Walnut Creek Watershed Restoration Plan.³
- **Please add a new policy** to support equitable access to the benefits of healthy creeks, including creation and maintenance of parks, trails, signage, and low-impact outdoor recreation opportunities such as birdwatching.
- **Please add a new policy** to address pollution and other health hazards caused by homeless encampments in and near creeks by, e.g., providing additional resources for the county agencies responsible for outreach and cleanups.
- **Please add a new policy** to prevent light pollution near creeks, wetlands, riparian corridors, and other sensitive wildlife areas. Light pollution interferes with the migration and life cycles of wildlife, particularly birds and bats. Therefore, if lighting is needed for public safety reasons, please add a policy to implement best practices for wildlife-friendly lighting near sensitive areas, including criteria regarding location & direction (low and downward facing), intensity, wavelength, and shielding.

³ See <https://www.contracosta.ca.gov/10011/Walnut-Creek-Watershed-Restoration-Plan> and <https://www.wewatershed.org/watershed-restoration-plan.html>.

	<ul style="list-style-type: none"> • Please add actions to implement the above recommended new policies. • Please add action to update the <i>Contra Costa County Watershed Atlas</i> (see above).
7-25	<p>It is insufficient to require drought-tolerant landscaping. The requirement should be to install native California landscaping. Invasive plants listed on the Cal-IPC database of invasive plants should be prohibited.</p> <ul style="list-style-type: none"> • Please revise COS-P7.1 and COS P7.8 to require, or at least prioritize, California native plant species and to prohibit invasive species.
7-27	<p>We strongly support COS-P7.10: “Support programs and activities conducted by community watershed groups and volunteers that increase public awareness and encourage stewardship of water resources.”</p> <ul style="list-style-type: none"> • Consider noting that “stewardship of water resources” includes creek and wetlands protection and restoration.
8-12, 14	<p>We strongly support Goal PFS-5: “Natural systems and flood-risk management infrastructure that can handle stormwater year-round and adapt to new and changing conditions.”</p> <ul style="list-style-type: none"> • Please revise PFS P5.5: “Require new development to participate in programs that ensure ongoing maintenance of <u>creeks</u> to maintain their flood carrying capacity and habitat values.” • Please revise PFS A5.4: “Establish programs for development projects alongside <u>creeks</u> that ensure regular maintenance of the waterway, including debris removal, erosion control, and conservation and restoration of native species.”



Grayson Creek Bird Survey Species List

Grayson Creek Riparian Corridor sections between Oak Park Blvd. and Chilpancingo Parkway, Pleasant Hill, CA
November 2017—November 2022

1. Greater White-fronted Goose (*Anser albifrons*)
2. Cackling Goose (*Branta hutchinsii*)
3. Canada Goose (*Branta canadensis*)
4. Wood Duck (*Aix sponsa*)
5. American Wigeon (*Mareca americana*)
6. Mallard (*Anas platyrhynchos*)
7. Bufflehead (*Bucephala albeola*)
8. Hooded Merganser (*Lophodytes cucullatus*)
9. Common Merganser (*Mergus merganser*)
10. Wild Turkey (*Meleagris gallopavo*) *
11. Pie-billed grebe (*Podilymbus podiceps*)
12. Rock Pigeon (*Columba livia*) *
13. Eurasian Collared Dove (*Streptopelia decaocto*) *
14. Mourning Dove (*Zenaidura macroura*)
15. White-throated Swift (*Aeronautes saxatalis*)
16. Black-chinned Hummingbird (*Archilochus alexandri*)
17. Anna's Hummingbird (*Calypte anna*)
18. Rufous Hummingbird (*Selasphorus rufus*)
19. American Coot (*Fulica americana*)
20. Killdeer (*Charadrius vociferous*)
21. Wilson's Snipe (*Gallinago delicata*)
22. Ring-billed Gull (*Larus delawarensis*)
23. California Gull (*Larus californicus*)
24. Double-crested Cormorant (*Phalacrocorax auratus*)
25. Great Blue Heron (*Ardea herodias*)
26. Great Egret (*Ardea alba*)
27. Snowy Egret (*Egretta thula*)
28. Green Heron (*Butorides virescens*)
29. Black-crowned Night-Heron (*Nycticorax nycticorax*)
30. Turkey Vulture (*Cathartes aura*)
31. Northern Harrier (*Circus hudsonius*)
32. Sharp-shinned Hawk (*Accipiter striatus*)
33. Cooper's Hawk (*Accipiter cooperii*)
34. Red Shouldered Hawk (*Buteo lineatus*)
35. Red-tailed Hawk (*Buteo jamaicensis*)
36. Belted Kingfisher (*Megasceryle alcyon*)
37. Red-breasted Sapsucker (*Sphyrapicus ruber*)
38. Acorn Woodpecker (*Melanerpes formicivorus*)
39. Downy Woodpecker (*Dryobates pubescens*)
40. Nuttall's Woodpecker (*Dryobates nuttallii*)
41. Northern Flicker (*Colaptes auratus*)
42. American Kestrel (*Falco sparverius*)
43. Merlin (*Falco columbarius*)
44. Peregrine Falcon (*Falco peregrinus*)
45. Western Wood-Pewee (*Contopus sordidulus*)
46. Willow Flycatcher (*Empidonax traillii*)
47. Pacific-slope Flycatcher (*Empidonax difficilis*)
48. Black Phoebe (*Sayornis nigricans*)
49. Say's Phoebe (*Sayornis saya*)
50. Hutton's Vireo (*Vireo huttoni*)
51. Warbling Vireo (*Vireo gilvus*)
52. Steller's Jay (*Cyanocitta stelleri*)
53. California Scrub-Jay (*Aphelocoma californica*)
54. American Crow (*Corvus brachyrhynchos*)
55. Common Raven (*Corvus corax*)
56. Chestnut-backed Chickadee (*Poecile rufescens*)
57. Oak Titmouse (*Baeolophus inornatus*)
58. Northern Rough-winged Swallow (*Stelgidopteryx serripennis*)
59. Tree Swallow (*Tachycineta bicolor*)
60. Violet-green Swallow (*Tachycineta thalassina*)
61. Barn Swallow (*Hirundo rustica*)
62. Cliff Swallow (*Petrochelidon pyrrhonota*)
63. Bushtit (*Psaltriparus minimus*)
64. Wrentit (*Chamaea fasciata*)
65. Ruby-crowned Kinglet (*Regulus calendula*)
66. Red-breasted Nuthatch (*Sitta canadensis*)
67. White-breasted Nuthatch (*Sitta carolinensis*)
68. Marsh Wren (*Cistothorus palustris*)
69. Bewick's Wren (*Thryomanes bewickii*)
70. European Starling (*Sturnus vulgaris*) *
71. Northern Mockingbird (*Mimus polyglottos*)
72. Western Bluebird (*Sialia mexicana*)
73. Hermit Thrush (*Catharus guttatus*)
74. American Robin (*Turdus migratorius*)
75. Cedar Waxwing (*Bombicilla cedrorum*)
76. House Sparrow (*Passer domesticus*) *
77. American Pipit (*Anthus rubescens*)
78. House Finch (*Haemorhous mexicanus*)
79. Purple Finch (*Haemorhous purpureus*)
80. Pine Siskin (*Spinus pinus*)
81. Lesser Goldfinch (*Spinus psaltria*)
82. Lawrence's Goldfinch (*Spinus lawrencei*)
83. American Goldfinch (*Spinus tristis*)
84. Chipping Sparrow (*Spizella passerine*)
85. Fox Sparrow (*Passerella iliaca*)
86. Dark-eyed Junco (*Junco hyemalis*)
87. White-crowned Sparrow (*Zonotrichia leucophrys*)
88. Golden-crowned Sparrow (*Zonotrichia atricapilla*)
89. White-throated sparrow (*Zonotrichia albicollis*)
90. Savannah Sparrow (*Passerculus sandwichensis*)
91. Song Sparrow (*Melospiza melodia*)
92. Lincoln's Sparrow (*Melospiza lincolni*)
93. California Towhee (*Melospiza crissalis*)
94. Spotted Towhee (*Pipilo maculatus*)
95. Western Meadowlark (*Sturnella neglecta*)
96. Hooded Oriole (*Icterus cucullatus*)
97. Bullock's Oriole (*Icterus bullockii*)
98. Red-winged Blackbird (*Agelaius phoeniceus*)
99. Brown-headed Cowbird (*Molothrus ater*)
100. Brewer's Blackbird (*Euphagus cyanocephalus*)
101. Orange-crowned warbler (*Leiothlypis celata*)
102. Common Yellowthroat (*Geothlypis trichas*)
103. Yellow Warbler (*Setophaga petechia*)
104. Yellow-rumped Warbler (*Setophaga coronata*)
105. Black-throated gray Warbler (*Setophaga nigrescens*)
106. Townsend's Warbler (*Setophaga townsendi*)
107. Wilson's warbler (*Cardellina pusilla*)
108. Western Tanager (*Piranga ludoviciana*)

Notes on other birds seen:

- One Golden eagle (*Aquila chrysaetos*): flyover.
- One Red-naped x Red-breasted Sapsucker.
- * Introduced species.

Total Species: 108, Total Raptor Species: 9

Total Native and Migratory Species: 103

Data Source: Grayson Creek Bird Survey, a joint community science project of Friends of Pleasant Hill Creeks/SEE) and Mt. Diablo Audubon Society. Updated: 10/17/23. *Contact:* pleasanthillcreeks@gmail.com.

***Delta Protection Commission Comments: CONTRA COSTA COUNTY
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Delta Protection Commission EIR Comments 4.8.24

The Delta Protection Commission (Commission) is providing comments on the EIR for the Contra Costa County General Plan update in anticipation of our review of findings required by California Public Resources Code (PRC) Section 29763.5. The Scope of our review is limited to impact analysis and conclusions that would materially affect our ability to endorse findings that the General Plan update is consistent with that section, and our duty to minimize impacts in the area of our jurisdiction (the Delta Primary Zone) as a CEQA responsible agency. We first discuss the scope of our review and the necessary findings we must prepare before we can submit a staff report finding that the General Plan is consistent for Delta Protection Commission (Commission) approval. We then provide specific comments below.

We have tried to provide an exhaustive review of your EIR in relation to our statutory duties for approval so that you may consider comments in a timely manner. However, because we must rely on your EIR and General Plan policies for making required findings for your General Plan, we encourage you to work with us as you prepare the final EIR and the final policies of the General Plan to support our findings. In addition, note that we may provide additional comments after the close of the comment period. These comments will be limited to issues that could affect our ability to make a finding of consistency with PRC Section (PRC) Section 29763.5 or satisfy CEQA.

Scope of Review and Required Findings

The Delta Protection Act requires the Commission to review General Plan updates for “local governments” as defined in the Delta Protection Act (PRC Section 29763.5). Because Contra Costa County is a “local government” within the meaning of the Act, your update requires these findings (PRC Section 29725). The findings required in Section 29763.5 are limited to the Primary Zone. However, in addition to the findings required in Section 29763.5, by regulation we must adopt mitigation for any significant impacts from the General Plan (14 Cal. Code of Regulations Section 20021(d) and 20019). If there are impacts that remain significant after mitigation, we must make the findings required by the California Environmental Quality Act at PRC section 21081 (see 14 Cal. Code of Regulations Section 20021(d) and 20019). We interpret this to be limited to impacts on the Primary Zone because the scope of our review under PRC Section 29763.5 is limited to the Primary Zone.

Specific Comments Regarding Impacts in the General Plan EIR

Comment 1: The Draft EIR is Represented as a Program EIR Which Will Support Tiering But it Should Make More Use of Mitigation Measures to Support Impact Reduction for Tiered Projects.

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The Draft EIR (DEIR) is represented as a program EIR but lacks a full palette of mitigation measures that would enhance and streamline tiered projects and also help ensure impacts are avoided or reduced.

“ This Draft EIR fulfills the requirements for a Program EIR. . .Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine whether an additional CEQA document is necessary. However, if the Program EIR addresses the program’s effects as specifically and comprehensively as possible, many subsequent activities may be within the Program EIR’s scope, and additional environmental documents may not be required (CEQA Guidelines Section 15168[c]). When a lead agency relies on a Program EIR for a subsequent activity, it must incorporate feasible mitigation measures and alternatives from the Program EIR into the subsequent activities (CEQA Guidelines Section 15168[c][3]). ” (DEIR at 1-3 to 1-4).

While the DEIR properly relies up on General Plan policies to explain why some impacts are reduced or avoided, it misses the opportunity to further shape how tiered projects are implemented and impacts will be avoided or reduced through the consistent use of mitigation measures. In addition, the failure to incorporate robust mitigation measures hinders the utility of the EIR for purposes of substantiating consistency with the Delta Protection Act under PRC Section 29763.5 as well as our independent duty to avoid impacts or adopt our own mitigation via findings (14 Cal. Code of Regulations Section 20021 and 20019).

Section 1.2.2 would also better support findings of consistency with Section 29763.5 if it provided, in the text, or an appendix, a short summary of all the kinds of discretionary actions that would be tiered projects, with a citation to the relevant County ordinance or code requiring a discretionary approval. By discretionary actions we do not mean specific projects as this cannot be known at this time – we mean the kinds of approvals that would be tiered from the General Plan EIR and subject to review for consistency with the General Plan and/or zoning code. This would allow us to show how future actions would be reviewed for consistency with the General Plan and thus, and by extension the Delta Protection Act because we could show the enforceability of the General Plan EIR and General Plan policies on specific project-level approvals that may occur in the future subject to review for General Plan/Zoning Code consistency.

Comment 2: Buildout Projections for the Horizon Year Comments

As a global issue it is hard to determine if there is consistency between impacts in different chapters and what the potential impact of the general plan would be without a visual depiction of the full buildout that may occur for the horizon-year projection described in page 3-24. Please provide a figure that shows the projected buildout assumption as a graphic depicting all land that would be developed based on the methodologies used in Section 3.7.

For example, the Urban Limit Line (ULL) is relied up on the narrative as a means of controlling growth or justification for avoided impacts (see Aesthetics Impact 5.1-2), however, there is farmland conversion depicted outside the urban limit line in the Delta Primary Zone above the ULL polygon around Discovery Bay (compare Figures 3-2, 5.2-4, and 5.11-1).

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Comment 3: Impact 5.1-2: Development under the proposed project would alter visual appearance in the county but would not substantially degrade its existing visual character or quality [Threshold AE-3] Requires Better Substantiation

This impact statement is at odds with Figure 5.2-4 which shows farmland conversion in the Delta Primary Zone above the Discovery Bay ULL polygon and Impact 5.2-1 which concludes that up to 13,816 acres of farmland could be converted (total, not just in the Delta Primary Zone). *Please add the Delta Primary Zone to the list of areas to be protected in Policy LU-P10.3* or an equivalent policy, and please create an overlay zone protecting farmland conversion in the Delta Primary Zone. Please then provide a revised impact statement in the Final EIR. The agricultural land uses in the Delta Primary Zone contribute to the overall visual character and feeling of the landscape. The agricultural land conversion contemplated in the EIR impact analysis for agriculture is inconsistent with this impact conclusion and the Commission’s duties under PRC Section 29763.5.

Also, because the protection of the Delta Primary Zone is critical to the adequacy of this impact conclusion, the impact text should reference a table or appendix that lists out or reference an appendix describing that the kinds of future discretionary approvals that are subject to review for consistency with General Plan policies (see comments on Section 1.2.2 above). It would be ideal if the policy protecting the Delta Primary Zone was also flagged for inclusion into the Zoning Code amendments via an action in the draft general plan text. Please also acknowledge that the Zoning Code must be updated following the General Plan amendment process per Cal. Government Code Section 65860 in the text of the revised policy and or action to provide a clear mechanism for enforceability.

If the text and policies are revised as suggested it will better support the significance conclusion by connecting the relationship of the policies listed above it to the impact conclusion through an analytical thread demonstrating that they will be legally enforceable. The text currently only reads “*Level of Significance Before Mitigation: Impact 5.1-1 would be less than significant.*” While the policies provided offer the beginning of a substantiated conclusion more connection is required. Per the leading legal desk book on CEQA, “*an EIR must set forth the bases for its findings on a project’s impacts; a bare conclusion without explanation of its factual and analytical basis is not sufficient analysis of an environmental impact*” (Kostka and Zischke 2023, Section 13.27, citing *Laurel Heights Improvement Association v. Regents of University of California*, 1988, 47 Cal. 3d. 376, 404).

Comment 4: Impact 5.1-3: The proposed project would not generate substantial light and glare [Threshold AE-4], Requires Better Substantiation

Please provide a citation or other documentation that the CalGreen building standards will be or have been incorporated into the County Code of Ordinances. This impact states that these standards will be enforced but a search of the County Code we found online does not actually contain the sections 74-8.002 to 74-8.006 which correspond to this material in the “CODE

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COMPARATIVE TABLE AND DISPOSITION LIST.” The online version may be out of date, please clarify. This statement regarding CalGreen building standards supports the overall conclusion that the General Plan will not generate substantial light or glare which feeds into the justification that the project will not adversely affect aesthetic resources in the Delta Primary Zone which we must also confirm for our findings. The relatively dark, rural character of the Delta Primary Zone is an integral aspect of the feeling of the landscape.

Comment 5: *Impact 5.1.5 Cumulative Impacts Is Not Adequately Justified*

Because the program impacts above are not fully substantiated we cannot agree with the cumulative impact conclusion, especially with regard to farmland conversion depicted in the Delta Primary Zone. If the issues regarding the program impacts are addressed it will be adequate to support the cumulative impact.

Comment 6: *Impact 5.2-1: The proposed project could convert approximately 13,816 acres of Important Farmland to nonagricultural use, [Threshold AG-1] Requires Additional Mitigation and Policy Controls*

This impact includes farmland conversion in the Delta Primary Zone near Discovery Bay, near Knightsen, and on Jersey Island (see Figure 5.2-4 and 5.11-1).

- ***If these projections are correct, we will not be able to make required findings under PRC Section 29763 subsections (a) ”The general plan, and any development approved or proposed that is consistent with the general plan, are consistent with the resource management plan”, and (h) “The general plan, and any development approved or proposed that is consistent with the general plan, will not adversely impact agricultural lands or increase the potential for vandalism, trespass, or the creation of public or private nuisances on public or private land.”***

In addition, if these projects are correct, the County and the Commission may have difficulty making the required CEQA findings for significant and unavoidable impacts required in PRC Section 21081, which require a showing that:

- Mitigation has been adopted to reduce the impact (PRC Section 21081(a)(1), or
- That mitigation is the responsibility of another entity or agency (PRC Section 21081(a)(2), or
- Such mitigation is infeasible ((PRC Section 21081(a)(3)).

There is a feasible mechanism for the County to avoid this farmland conversion: a policy against farmland conversion in the Primary Zone. Because this is feasible, the County cannot rely on the second and third prongs of PRC Section 21081 (i.e. that the mitigation that could reduce the impact is the responsibility of another entity or agency, or that such mitigation is infeasible). For significant and unavoidable impacts the lead agency must make one of these three findings. The

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County could adopt an overlay zone as a General Plan policy or zoning code amendment that prohibits farmland conversion in the primary zone.

Farmland conversion is an impact on aesthetic resources as described above, and inconsistent with the Delta Protection Act. In addition, conversion reduces the economic sustainability of the Delta. Our planning work documents that agriculture is the main economic driver of the Delta economy (Delta Protection Commission 2012:274). A dollar of agricultural crop revenue generates three to five times greater regional income than other leading revenue sources such as recreation or tourism (Delta Protection Commission 2012:274).

The EIR states that “*development of land outside the ULL is restricted to non-urban uses by the County’s ULL, which would help to prevent conversion of the majority (75 percent) of the total potential 13,816 acres*” (EIR at 5.2-19).

We contend that the ULL is a soft boundary which lacks the relatively greater enforceability of land use designations or an overlay zone prohibiting certain uses or conversions. We recommend you revise Policy COS-P2.2 to explicitly include protection of the Delta Primary Zone in the text of this policy, and also create an overlay zone protecting the entire Primary Zone with regard to agricultural conversion. We also recommend that these requirements be incorporated into the zoning code.

The impact analysis does not meet CEQA standards for mitigation. In the impact analysis, when mitigation is considered, the text states: *The criterion for mitigation under CEQA is feasible mitigation that lessens a project's impacts. Agricultural conservation easements are a possible mitigation measure under CEQA. Programs that establish agricultural conservation easements and in-lieu fees for mitigation banking are most effective when determined concurrent with project approval. However, the effectiveness and extent to which future projects would opt-in to agricultural conservation easements as mitigation measures cannot be determined in this analysis; therefore, this impact would remain significant and unavoidable* (EIR at 5.2-21).

This language essentially concedes that mitigation is feasible, but defers to future project level analysis. The duty to mitigate applies to the CEQA lead agency analyzing an impact, not future and ambiguous project reviews. See PRC Section 21002 which states that public agencies shall not approve projects if there is feasible mitigation that would reduce significant effects.

The County has the opportunity ***and the duty*** to adopt mitigation at this stage, rather than during future tiered projects (see the requirement that feasible mitigation be adopted in PRC Section 21081(a)(1) and Section 21002 as cited above. These requirements could be imposed via policy and zoning code amendments and then would be applied to projects tiered from the General Plan EIR and any other discretionary approvals in the Primary Zone. In this scenario (use of policy

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and zoning code as the means of mitigation) the County would be better situated to show it has satisfied Section 21002. This would also be the best means of satisfying the need for consistency with the Delta Protection Act under PRC Section 29763.5(h):

- *“The general plan, and any development approved or proposed that is consistent with the general plan, will not adversely impact agricultural lands or increase the potential for vandalism, trespass, or the creation of public or private nuisances on public or private land.”*

Comment 7: Impact 5.2-5: The proposed project could potentially result in other agricultural impacts not related to the above, such as diminishing available water quality and supply for agricultural uses. [Threshold AG-5] Requires Better Substantiation.

This impact states that *“future development under the proposed General Plan would increase water demands, as further described in Section 5.17, Utilities and Service Systems, which would diminish the available water supply for agricultural uses. Such development would occur throughout the county, which spreads the impact over a large geographic area”* (EIR at 5.2-24).

It is clear that the General Plan itself does not approve a “project” subject to a water supply analysis as required in Cal. Water Code Section 10912 (which requires strong proof of adequate water availability). Nonetheless more analysis is required.

The mere assertion that the distribution of the development would occur “over a large geographic area” as support for its insignificance for water demand is not persuasive. The EIR projects a total of 23,200 housing units and 65,600 residents for the horizon-year project at page 3-25. As a rough yardstick, assuming a water usage of 48 gallons per person per day¹ this results in a total consumption assuming full buildout of 3,160 acre feet of water per year. While water consumption varies by agricultural land use type and is becoming more efficient over time, using 1.6 acre feet per acre per year as a rough metric² this is equivalent to water that could support roughly 1,975 acres of irrigated farmland. While not all of this water would be diverted from Delta Sources, the multiple demands on Delta water supplies and connected groundwater basins as well as the general water scarcity in the state suggest more facts are needed to substantiate this conclusion. This is especially important because the water consumed by residential buildout would not be available for other uses, including agricultural uses.

Please provide stronger support for this assertion showing how the water consumption is accounted for at least, at a program level of analysis, by briefly summarizing relevant water supply planning for utilities serving unincorporated areas of the County. Please also provide a citation to and summary of the requirement that future developments must meet to satisfy the requirements of Cal. Water Code Section 10910 in the impact analysis. See Section 10910 for the

¹ California Department of Water Resources. 2021. [State Agencies Recommend Indoor Residential Water Use Standard to Legislature](#). Accessed April 3, 2024.

² US Department of Agriculture. [Per Acre Water Use in Irrigated Farmland Shows a Declining Trend](#). Accessed April 3, 2024.

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general requirement and Section 10912 for the definition of “projects” subject to the requirement. This information will better support the conclusion of less than significant, and in turn support our ability to adopt your impact analysis for purposes of our own findings.

Comment 8: Impact 5.4-1: Implementation of the proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plan, policies, or regulations or by the CDFW or USFWS is Not Consistent With the Facts Provided in Other Impact Analysis Sections

The biological resources chapter provides a summary of a robust set of policies designed to avoid impacts on natural resources. However, the significant and unavoidable impact for agricultural and conversion in *Impact 5.2-1* is contradictory to this impact conclusion (*5.4-1*).

Agricultural land also typically provides foraging habitat for raptors and dispersal habitat for other species. Table 5.4-3 indicates Swainson’s hawk and other raptors are present in Contra Costa County. Swainson’s hawk is a state-listed species.

CDFW must make the determination for a “threatened” listing based on facts demonstrating the presence of one or more of the factors provided in California Code of Regulations Title 14, Section 670.1(i)(1)(A), including “*present or threatened modification or destruction of [a species’] habitat.*” The primary threat to Swainson’s hawk is loss of suitable foraging habitat, including suitable agricultural foraging habitat (CDFW 2016:3).

The impact conclusion of less than significant for *Impact 5.4-1* is not consistent with the impact conclusions of significant and unavoidable for *Impact 5.2-1* because the magnitude of farmland loss will also reduce raptor foraging habitat which undermines the credibility the impact conclusion for *Impact 5.4-1* greatly.

This inconsistency could be resolved if the General Plan adopts an overlay zone or strong policy of avoiding agricultural and conversion in the Delta Primary Zone which is then adopted into the zoning code. Please provide an overlay zone and policy that includes language requiring protection of Delta farmland in the Primary Zone be enforceable via zoning code amendments. Please then update *Impact 5.4-1* to show how this policy will further reduce habitat loss associated with the foraging and dispersal habitat functions of agricultural land.

Comment 9: Please Provide Mapping of Pacific Flyway Habitat in the Delta Primary Zone to Support Our Review and Ensure Impacts Are Minimized by Policy of Mitigation Measure

Please include in the EIR some mapping or analysis of Pacific Flyway habitat. We need this impact analysis for our consistency review process.

PRC Section 29726 states:

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- *“Pacific Flyway” means the identified migratory bird flight path, including feeding and nesting habitat, as described in the Central Valley Habitat Joint Venture component of the North American Waterfowl Management Plan (NAWMP-1986).*

PRC Section 29763.5 requires us to show that:

- *The general plan, and any development approved or proposed that is consistent with the general plan, will not result in the degradation or reduction of Pacific Flyway habitat.*

Comment 10: Impact 5.4-4: Implementation of the proposed project could interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. [Threshold B-4] Could be Better Substantiated

We support the overall policy approach of avoiding impacts on wildlife movement corridors in the General Plan EIR. We suggest that the efficacy of this approach could be improved. Buildout of the General Plan will inevitably require road improvements and/or construction. The General Plan could enhance protection of movement opportunities by requiring that road improvements and new road construction include wildlife crossing improvements targeted to the species likely to navigate habitat patches such roads bisect, if any. Mitigation Measure BIO-1 provides appropriate mitigation but falls short by not explicitly requiring crossing structures for road improvements where crossing structures are necessary. It says the County will “*Encourage development plans that maximize wildlife movement,*” which is not adequately specific.

The Federal Highway Administration (FHWA) reports that “*roads are a serious obstacle to maintaining population connectivity and a threat to the long-term survival of some regionally important wildlife populations*” (FHWA 2011:1). This is an especially important issue in light of climate change which will change the location of suitable habitats and require opportunities for populations to shift accordingly (Costanza et al. 2020).

The General Plan policies could prescribe that future projects requiring new roads or road improvements 1) identify focal species that may be subject to movement impacts and 2) include crossing improvements that are targeted to the focal relative focal species in terms of crossing design that is appropriate for the relevant focal species. This will better support our ability to rely on your impact conclusions for PRC Section 29763.5.

The County has an opportunity to further refine protection of wildlife movement and save costs by avoiding unnecessary mitigation to ensure permeability if it undertakes a local countywide study of wildlife movement. A modeling approach combined with camera trapping data would be a good methodology. Existing studies for major infrastructure projects provide an example of how this can be achieved (Authority 2020: Appendix C, *Wildlife Corridor Assessment*).

If the County conducts a wildlife movement study to determine where wildlife movement actually occurs wildlife crossing mitigation for roadways can be targeted to only those locations

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that are relevant. This could be achieved by a County-led study or in concert with NGO and other agency partners. Existing entities like the Wildlife Conservation Board fund such studies. In addition, the study and or mitigation could potentially be offset by the sale of mitigation credits if the County incorporated the study and/or mitigation into a Regional Conservation Investment Strategy (RCIS, see Cal. Fish & Game Code Section 1850 et seq.).

If the County, at a minimum, includes a policy or mitigation measure that requires assessment of wildlife movement impacts and incorporation of appropriate mitigation into roadway improvements and new roads, this would better support our finding of consistency and analysis of impacts. While the Delta Primary Zone is largely agricultural in nature it does some dispersal and foraging habitat for terrestrial species subject to roadkill and movement barriers associated with roads.

Comment 11: Impact 5.5-1: Implementation of the proposed project could cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5 Needs Additional Mitigation

The cultural resources policies in the draft General Plan are mostly a robust and sound approach to managing cultural resources impacts. We want to offer minor clarifications regarding the language in the chapter and suggestions regarding the impact conclusions and mitigation approach.

The impact analysis for Impact 5.5-1 reads largely as if “historical resource” was synonymous with resources from the historic-era and specifically built environment resources. Under California law, a “historical resource:” is “. . .any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (Cal. Public Resources Code Section 5020.1). The eligibility criteria for the California Register of Historical Resources includes but is not limited to resources that have information important in prehistory (i.e. archaeological resources, Cal. Public Resources Code Section 5024.1(c)(4)).

The impact should be revised so it is more clear that archaeological resources are part of the scope of resources considered under the impact analysis. This gap in the language is important because archaeological resources, by nature, are harder to identify before construction, and more susceptible to inadvertent damage than built environment resources. Archaeological resources can be buried under layers of sterile soil, obscured by hardscape, or simply missed in inventory efforts due to scant surface manifestations.

In addition, the overall significance conclusion of significant and unavoidable for this impact needs to be supported by a complete palette of mitigation. Significant and unavoidable impacts must make the required CEQA findings in PRC Section 21081 as stated above. We support the existing policies and actions provided below:

- *Policy COS-P10.5: When a project involves a resource that is listed in the County’s Historic Resources Inventory, or as otherwise necessitated by the CEQA process, require*

***Delta Protection Commission Comments: CONTRA COSTA COUNTY
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applicants to engage a qualified consultant to prepare an evaluation of potential and previously identified archaeological, cultural, and historic resources that may be present on the project site.

- *Action COS-A10.1: Beginning in 2024, then every five years thereafter, review and update the County's Historic Resources Inventory and Archaeological Sensitivity Map in consultation with culturally affiliated tribes to ensure these remain useful tools for evaluating potential cultural resources impacts and guiding preservation efforts. As part of the 2024 update to the Historic Resources Inventory, create a map of the listed historic resources, and update the map upon each update to the Historic Resources Inventory. Ensure tribal cultural resources identified through these updates remain confidential.*

These policies may implicitly rely upon landscape level sensitivity analysis and geomorphological data to identify areas of buried site archaeological sensitivity but if they do it is not clear in the text. This should either be made clear, or the policy and action should be updated to include the best-available methodologies for assessing for archaeological sensitivity, including means for identifying buried sites that cannot be identified based on surface manifestations. See Meyer and Rosenthal (2007) for an example.

This impact would also be reinforced if the County provided more of a summary of the results of AB 52 consultation regarding tribal cultural resources.

Comment 12: Impact 5.5-2: and Impact 5.5-3 Make Impact Conclusions That Are Inconsistent with The Facts and Conclusion in Impact 5.5-1

The EIR states “*Even with implementation of the proposed General Plan goals, policies, and actions, the regulations would not fully reduce potential impacts on historic resources at the programmatic level. Therefore, this is considered a potentially significant impact*” (EIR at 5.5-13). The EIR then concludes that even with the general plan policies the impact is significant and unavoidable. The impact analysis in 5.5-1 applies to both built environment resources and archaeological resources. The impact conclusions after mitigation, for Impacts 5.5-2 (archaeological resources) and 5.5-3 (buried human remains) are less than significant. These conclusions are inconsistent with Impact 5.5-1 which is significant and unavoidable. Buried archaeological resources and human remains, by their nature, are harder to identify and mitigate for or avoid entirely than built environment resources. Construction can easily disturb and damage such resources before they are noticed given the scale of earthmoving equipment and the fragility of the resources.

Major infrastructure projects can inadvertently damage archaeological sites and buried human remains despite a complete and robust environmental review process, including pre-construction testing. Levee repairs along the Feather River, for example discovered 230 plus burials associated with extensive cultural deposits, only in the construction phase (CapRadio 2015).

Additional mitigation that adds geomorphology based archaeological sensitivity analysis as a precondition for approval of projects in areas of high sensitivity would better justify the impact conclusions for 5.5-2 and 5.5-3. This is especially important given the sensitivity of the Delta Primary Zone for archaeological resources.

***Delta Protection Commission Comments: CONTRA COSTA COUNTY
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Comment 13: Impact 5.11-2: Project implementation would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect Cannot be Supported by the Existing Text or General Plan Policies.

The agricultural land conversion identified in the EIR as a significant and unavoidable impact occurs largely in the Delta Primary Zone. The impact and setting do not meaningfully summarize how consistency with the Delta Protection Act and Land Use and Resource Management Plan will be achieved. This gap hinders the credibility of the impact conclusion for this impact (less than significant). We believe it cannot be supported based on the current impact conclusions and policy text.

Comment 14: Text Summarizing the Land Use and Resource Management Plan Must be Updated

The EIR provides a cursory statement regarding the *Land Use and Resource Management Plan* on page 5.11-12. It fails to mention the standards the County must meet for approval of their General Plan under PRC Section 29763.5. It also provides no meaningful summary of the content of the Land Use and Resource Management Plan. Please revise this text appropriately.

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2045 GENERAL PLAN AND CLIMATE ACTION PLAN DRAFT EIR***

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April 8, 2024

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SENT VIA EMAIL TO:

email@envisioncontracosta2040.org

Will Nelson
Principal Planner
Department of Conservation and Development
Contra Costa County
30 Muir Road
Martinez, CA 94553
will.nelson@dcd.cccounty.us

Re: Draft Contra Costa County 2045 General Plan Update and Climate Action Plan Draft Environmental Impact Report (aka Envision Contra Costa) (State Clearinghouse Number 2023090467)

Dear Mr. Nelson:

Thank you for the opportunity to review the proposed 2045 Contra Costa County General Plan and Climate Action Plan Draft Environmental Impact Report (EIR). Contra Costa Water District (CCWD) submits the following comments, which are intended to initiate a constructive program between Contra Costa County (County) and CCWD to facilitate adequate storm drain system planning and maintenance as it pertains to water facilities either owned or operated and maintained by CCWD within the jurisdiction of the County, and to ensure adequate and safe drinking water to new developments.

Background

CCWD operates and maintains United States Bureau of Reclamation (Reclamation) owned water conveyance facilities and property, a significant portion of which traverses central and eastern Contra Costa County and terminates at the Martinez Reservoir.

The 48-mile Contra Costa Canal (Canal), which was constructed in the 1940s, is CCWD's backbone facility that conveys water from the Sacramento-San Joaquin Delta to eastern and central Contra Costa County. It originates at Rock Slough in the City of Oakley, passing through several cities and communities before terminating at the Martinez Reservoir in the City of Martinez. The water supply serves 550,000 people in the central and northeastern county area, including municipalities, industrial customers, businesses, and residences. The majority of the Canal is an open concrete-lined channel and is within both incorporated and unincorporated areas of Contra Costa County.

CCWD also operates its Multipurpose Pipeline (MPP), a backbone treated water conveyance facility built in 2002, within the Canal right of way (ROW). The MPP is a pressurized underground 42-inch diameter welded steel pipeline that generally runs parallel to the open Canal from the Randall-Bold Water Treatment Plant in the City of Oakley to CCWD's Treated Water Service Area in the City of Concord. A significant portion of the MPP also traverses unincorporated Contra Costa County.

Overview of Concerns

The Canal was constructed in the 1940s, prior to the extensive urban development that has taken place within the County since that time. This includes culverts and drainage areas that were originally constructed to convey flows occurring at the time across the Canal, but generally not designed to support additional runoff from future urban development. Nevertheless, these culverts and pathways have become hydraulically connected to urban development and are depended upon to properly drain these developments and prevent flooding. In addition to these smaller culverts and pathways, there are larger creeks and drainages within the County boundaries, also modified by urban development, that must pass through Canal ROW and MPP.

CCWD is concerned that the drainage features within the Canal ROW, designed prior to these developments, do not have sufficient capacity for existing, let alone future, storm water runoff, and that more comprehensive analysis needs to be conducted by the County and developers to ensure that there are adequate storm water facilities to handle maximum flows that could occur during large storm events. Additional planned development has the potential to increase the risk of cumulative erosion or flooding that could impact the reliability and security of the regional water supply and integrity of CCWD's backbone Canal and MPP facilities.

Due to existing issues with the stormwater drainage system, development under the County's General Plan Update may cause potentially significant flooding or erosion impacts that must be mitigated through improvements to Canal facilities or maintenance agreements for existing facilities. Thus, CCWD offers comments to address our concerns and urges the County to consider these issues, consistent with its obligations under the General Plan law and CEQA.

CCWD is also concerned about approval of developments in County unincorporated areas that do not have sufficient water supply or that encourage small / private groundwater systems in areas with known water quality impacts and health concerns. The County should encourage connections with permitted surface water supplies from larger established water agencies like CCWD.

CCWD's Comments on Draft 2045 General Plan Update and Draft Climate Action Plan / EIR

CCWD Comment 1:

CCWD proposes the following policies be included in the Health and Safety Element of the 2045 General Plan:

- HS-P5.9 - Require an encroachment permit from Contra Costa Water District (CCWD) for any new storm drain facility or anticipated runoff that will add load to existing facilities crossing or encroaching onto Contra Costa Canal rights-of-way.
- HS-P5.10 - Protect water quality by reducing non-point sources of pollution and the dumping of debris in and near creeks, storm drains, and the Canal. All drainage from new development should be either directed to an appropriate storm drain system that avoids CCWD facilities and Canal ROW, or obtain an encroachment permit from CCWD.

Please note that, as a condition of an encroachment permit, CCWD may seek maintenance agreements with the County for any drainage facilities located within the Canal right of way that support and benefit urban drainage within the County unincorporated areas.

Also, depending on the circumstances, CCWD may request that any new development that could impact the Canal ROW, CCWD facilities, or drainage facilities conduct a hydrologic study to demonstrate sufficient capacity and erosion protection of downstream facilities to accommodate the development, and any improvements needed to protect the Canal be funded by the County or the developer.

CCWD Comment 2:

The 2045 General Plan should fully reflect the Water Service Implementation Measures that were included in Chapter 7 - Public Facilities/Services Element of the existing County General Plan (2005-2020). These measures should be carried forward to Goal PFS-4 in the 2045 General Plan because they provide needed detail to ensure a reliable water supply and protect public health.

7-i. Conditionally approve all tentative subdivision maps and other preliminary development plans on verification of adequate water supply for the project. Such condition shall be satisfied by verification, based on substantial evidence in the record, that capacity within the system to serve the specific development project exists or comparable demonstration of adequate wastewater treatment capacity. Where no tentative map or preliminary plan is required prior to development, approve no map or development permit without this standard being satisfied.

7-j. Identify, map, and monitor those areas where high levels of nitrates, arsenic, and/or manganese have been detected in groundwater supplies. Development should seek surface water supplies if any of these contaminants are known to be in groundwater supplies.

7-k. Discourage subdivisions or other permits which would allow the construction of rural residential units served by well water in areas of high nitrate concentrations, consistent with existing Health Department policy.

7-l. Discourage subdivisions or other permits which would allow the construction of rural residential units served by well water on lots of less than one acre, consistent with existing Health Department policy.

CCWD Comment 3:

The Health and Safety policies proposed in Comment 1, as well as the Public Facilities and Services policies proposed in Comment 2, should also be included and addressed within the Climate Action Plan Draft EIR.

CCWD Comment 4:

CCWD suggests revisions to the description of CCWD included on Page 8-8 of the 2045 General Plan. Currently, the description reads:

- CCWD provides treated water to approximately 500,000 customers in the urbanized parts of central Contra Costa County that are not serviced by EBMUD, as well as some eastern parts of the county. CCWD's water is sourced from the Sacramento-San Joaquin Delta via the 48-mile Contra Costa Canal. CCWD also stores water at Los Vaqueros Reservoir in East County, southwest of Byron.

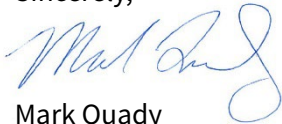
CCWD recommends revising the first sentence as follows:

- **CCWD provides treated and untreated water to approximately 550,000 people in central and northeastern Contra Costa County, including municipalities, industrial customers, businesses, and residences.** CCWD's water is sourced from the Sacramento-San Joaquin Delta via the 48-mile Contra Costa Canal. CCWD also stores water at Los Vaqueros Reservoir in East County, southwest of Byron. **Los Vaqueros Water once released is delivered via the Contra Costa Canal.**

Conclusion

Thank you for considering CCWD's comments on the Draft 2045 General Plan and Climate Action Plan Draft EIR. We look forward to working with the County to find mutually beneficial solutions to protect the integrity of CCWD's water conveyance facilities, and to ensure adequate supplies to new developments while protecting public health. Should you have any questions about the comments raised in this letter, please do not hesitate to contact me at (925) 688-8312.

Sincerely,



Mark Quady
Planning Manager

cc: Jeff Quimby – Assistant General Manager, Planning and Administration
Kimberly Lin – Director of Planning
Mark Seedall – Principal Environmental Planner

Holland & Knight

560 Mission Street, Suite 1900 | San Francisco, CA 94105 | T 415.743.6900 | F 415.743.6910
Holland & Knight LLP | www.hklaw.com

Letitia D. Moore
+1 415-743-6948
Letitia.Moore@hklaw.com

April 8, 2024

Sent via email

Supervisor Federal D. Glover
Supervisor Ken Carlson
Supervisor Diane Burgis
Supervisor Candace Andersen
Supervisor John M. Gioia
Chair Kevin Van Buskirk
Director John Kopchik

Re: Comment Period Extension Request – Proposed Contra Costa County
Climate Action Plan 2024 Update, Draft 2045 General Plan, and General Plan and
Climate Action Plan Draft Environmental Impact Report (DEIR)

Dear Supervisors, Commissioner and Director:

The Committee for Industrial Safety (CIS) has engaged Holland & Knight LLP to advise the CIS in evaluating the Contra Costa County updated 2024 Climate Action Plan (CAP). The CIS is a nonprofit association, its purpose is to educate the public and advocate on matters of refinery safety and related regulatory policy and environmental protection. Contra Costa County is home to workers, communities and facilities associated with CIS and served by CIS educational and advocacy efforts. The climate related policies and measures to be implemented through the CAP will have significant impact on those workers, communities and facilities, on their public, environmental and economic health and vitality.

We respectfully request that you extend, for an additional 60 days, the comment period for the 2024 CAP, Draft 2045 General Plan, and the General Plan and Climate Action Plan Draft Environmental Impact Report (DEIR). The County has stated that the 2024 CAP is intended to serve as a companion to the “. . . 2045 General Plan and to mitigated GHG emissions that result from implementation of the General Plan.” CAP, p. ES-1. As such, the 2024 CAP is integral to implementation of the 2045 General Plan and is a fully enforceable commitment as a mitigation measure under the California Environmental Quality Act (CEQA). Implementation of the CAP is

also a General Plan requirement (COS-P14.1). The CAP and CAP consistency with the Draft General Plan, the Draft General Plan, and the General Plan and Climate Action Plan DEIR, therefore, warrant thorough review, discussion and comment.

Environmental justice and economic development are important to our Contra Costa communities, and important for successful implementation of the Draft 2045 General Plan and the Draft 2024 CAP. The 2045 General Plan aspires to ensure that

Focused and ambitious actions are taken to reduce greenhouse gas emissions, improve community resilience, and adapt equitably to a changing climate.

Furthermore, to address environmental justice and historical inequality of public and environmental health impacts, the Draft 2045 General Plan identifies that

It is a priority of the County to protect Impacted Communities from additional harm and progressively improve the quality of life and health outcomes of residents. GP, at p. 3-3.

Additional time is required to review and identify mechanisms to ensure that environmental justice and economic development principles and practices are fully integrated into implementation of the CAP and the General Plan and analyzed in the DEIR. For example, the Draft General Plan Environmental Justice and Economic Development Policies promote “renewable and sustainable industries that provide living-wage jobs” (Policy SC-P1.1) and “streamline . . . permitting process for new development, redevelopment, and rehabilitation that promotes community objectives in Impacted Communities” (Policy SC-P1.2) The Draft General Plan sets as a policy action, “paying special attention to developing new opportunities for Impacted Communities to realize economic, health, educational, and other benefits.” Action SC-A1.1. Although the County says that the CAP is designed to help meet environmental justice objectives (p. ES-2), the true measure is with the implementation strategies. Stakeholders and commenters need additional time to review and evaluate whether the CAP includes implementation strategies that will promote job and revenue opportunities as well as climate change goals in environmental justice communities. The General Plan and CAP set clear priorities for waste and energy reduction, clean energy production and use, resilient communities, and climate equity; further review is needed to evaluate how the General Plan and CAP address and ensure economic equity and the protection of civil rights more broadly in environmental justice communities.

Additionally, consistency between the General Plan and the CAP, and internal consistency within the General Plan, are important elements to a legally adequate General Plan. General Plans that are internally inconsistent are illegal, and courts have and may continue to impose the draconian remedy of halting all new development pending adoption of an internally consistent and legally adequate General Plan. *See, e.g., Save El Toro Assn. v. Days (1977) 74 Cal.Appl. 3d 64.*

Finally, County activities include existing environmental justice and economic development initiatives designed to facilitate continuing dialogue with environmental justice communities, workers, and businesses, and pursue strategies to create thousands of new living-wage jobs,

emphasize local workforce hiring, and protect and build the regional tax base. Current environmental justice and economic development activities identified by the Contra Costa County Department of Conservation & Development in November 2023 include,


- Northern Waterfront Economic Development Initiative,
- Just Transition Economic Revitalization Plan (JTERP),
- Bay Area Good Jobs Partnership for Equity (Community Economic Resilience Fund),
- Contra Costa Refinery Transition Partnership, and
- Refinery Community Benefits Agreements.

While the 2023 Interim CAP Progress Report identifies some implementation activity with the JTERP and the County's support of AB 844, it does not reflect any significant progress on addressing environmental justice and economic development. Reversing historic injustices, while retaining and attracting businesses, jobs, workers and industry, must be an integral part of implementation of the General Plan and the County's strategic climate action plans. To that end it is of utmost importance that the Draft 2045 General Plan and the updated 2024 CAP consistently integrate environmental justice and economic development practices and priorities in a manner that activates those General Plan priorities.

We request that you extend the comment period for the Draft 2045 General Plan, updated 2024 CAP, and DEIR, to allow for additional input of key stakeholders, discussions with County staff, and priority focus on the integration of equity and economic development in the proposed General Plan and CAP.

Sincerely yours,

HOLLAND & KNIGHT LLP



Letitia D. Moore

cc: William R. Nelson, Principal Planner

Addressees:

Supervisor Federal D. Glover - Federal.glover@bos.cccounty.com

Supervisor Ken Carlson - Supervisorcarlson@bos.cccounty.us

Supervisor Diane Burgis - diane.burgis@bos.cccounty.us

Supervisor Candace Andersen - supervisorandersen@bos.cccounty.us

Supervisor John M. Gioia - John.Gioia@bos.cccounty.us

Chair Kevin Van Buskirk - vanbuskirk1691@gmail.com

Director John Kopchik - john.kopchik@dcd.cccounty.us

Cc: William R. Nelson - Will.Nelson@dcd.cccounty.us

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



April 8, 2024

SCH #: 2023090467
GTS #: 04-CC-2023-00750
GTS ID: 30908
Co/Rt/Pm: CC/VAR/VAR

Will Nelson, Principal Planner
Contra Costa County
30 Muir Road
Martinez, CA 94553

Re: Contra Costa County 2045 General Plan and Contra Costa County Climate Action Plan 2024 – Draft Environmental Impact Report (DEIR)

Dear Will Nelson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this project. The Local Development Review (LDR) branch reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

The following comments are based on our review of the February 2024 DEIR. Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purpose only.

Project Understanding

The purpose of the General Plan update is to create a long-term vision for the County's physical development, to address challenges such as climate change and housing insecurity, and to enhance quality of life for Contra Costa County residents. The project also includes an update to the County's 2015 Climate Action Plan (CAP). The CAP is a separate document that supports the General Plan by establishing goals and strategies to reduce greenhouse gas emissions in unincorporated Contra Costa County, consistent with State targets.

Travel Demand Analysis

The project's vehicle miles traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the County's adopted VMT policy. Per the DEIR, this project is found to have significant and unavoidable VMT impact. Caltrans commends the Lead Agency for developing a Transportation Demand Management

(TDM) program for development projects with significant VMT impacts. We encourage the Lead Agency to continue exploring potential VMT options and document the TDM program with annual monitoring reports to demonstrate effectiveness.

Sea Level Rise

In the 2020 Caltrans District 4 Adaptation Priorities Report ([link](#)), Interstate (I)-680 within the project location is identified as a high-priority Caltrans asset vulnerable to sea level rise, storm surge, and climate change impacts, including increased precipitation. Caltrans would like to be included in discussions, to stay informed as Caltrans is interested in engaging in multi-agency collaboration early and often, to find multi-benefit solutions that protect vulnerable shorelines, communities, infrastructure, and the environment. Please contact Vishal Ream-Rao, Caltrans Bay Area Climate Change Planning Coordinator, with any questions at d4_climateresilience@dot.ca.gov.

Equity

We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans is committed to advancing equity and livability in all communities. We look forward to collaborating with Contra Costa County to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Llisel Ayon, Associate Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please contact LDR-D4@dot.ca.gov.

Sincerely,



YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

From: Email Request
Sent: Monday, April 8, 2024 5:03 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: continuation of harm of oil drilling

From: Laura Rosenberger Haider <lauragreen.rosenberger@gmail.com>
Sent: Monday, April 8, 2024 5:02:36 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request
Subject: continuation of harm of oil drilling

[You don't often get email from lauragreen.rosenberger@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

A 2021 Stanford study found increased ozone up to 2.5 miles from oil wells. Ozone irritates respiratory system and is linked to lung developmental problems.

From: Email Request
Sent: Monday, April 8, 2024 4:57 PM
To: advanceplanning@dcd.cccounty.us; Tanya Sundberg; Lauren Willey
Subject: FW: Thanks for this climate ordinance calling for a ban on oil drilling

From: Laura Rosenberger Haider <lauragreen.rosenberger@gmail.com>
Sent: Monday, April 8, 2024 4:56:57 PM (UTC-08:00) Pacific Time (US & Canada)
To: Email Request
Subject: Thanks for this climate ordinance calling for a ban on oil drilling

[You don't often get email from lauragreen.rosenberger@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

It's better to put a moratorium in place to prevent any more oil drilling permit approvals than to rely on failed carbon capture projects like the following: The Elk Hills blue hydrogen plant emits 5% of the carbon it produces(Ref: Gordon Nipp) and maybe more if pipeline accidents occur.

This project relies on unproven carbon capture in one of the oldest natural gas fields with old wells that have a high probability of leakage. The carbon storage's total air emissions would exceed SJVAPCD's limits for NOx, PM 10 & PM 2.5 and result in nonattainment of the federal PM 2.5 standard.

Those old wells had VOC leakage in the past. VOCs came up from water wells near Elk Hills/ N. Cole Levy Oilfields (see 2018 study by John Warden, Ph.D. presented at a Water Board Meeting). Since VOCs escaped through water wells in this oilfield, I suspect CO2 would escape from the storage likewise, increasing its CO2 emissions, There were 2 leaks from other carbon pipelines one in LA and one in Mississippi that caused people to suffocate. CO2 gas is invisible. Its pipeline is planned to be placed within 3 mile of an elementary school. Previous carbon capture projects failed to meet their goals.

If the Elk Hill's Oilfield, continues to operate due to the demand created by the blue hydrogen plant, then more wastewater would have to be injected into the ground and the risk of earthquakes would increase and the risk of leakage from the carbon storage would increase. Where there is much wastewater injection, scientists found mixing of the aquifer which brought up saline water and worsened water quality.

Injecting high pressure CO2 deep underground would have the same effect. Already there were pollutants often brought up by oil drilling in the tap water from the West Kern Water District based in Taft between 2014 and 2019 including Uranium 27 times higher than considered safe by Environmental Working Group, combined radium 2.1 X EWG's health guidelines, & Thallium 3.8X EWG's health guidelines. From 2017 - 2019, hexavalent chromium was 37 X and arsenic was 367 X.

EWG's health guidelines. Also there were many halogenated compounds in the tap water in amounts higher than EWG's health guidelines. (from EWG.org, Tap Water Database by Chris Campbell)

A fracking wastewater storage in sandstone near the town of Plum in PA near Pittsburgh leaked and contaminated residents water wells.

Therefore how could they expect to keep high pressure CO2 in the ground long enough to meet our long term carbon emission goals with the risks of earthquakes, terrorism and wars.

Oil companies in 5 states used chemicals which break down into PFAs

One chemical emitted by oil wells in Lost Hills, isoprene, was found by OEHHA to have a human inhalation cancer risk and doubled the rate of 2 or more cancers in rodents.

A recent University of Pittsburgh study found a significantly increased rate of lymphoma in children born within a kilometer of oil wells.

The amount of radium in fracking wastewater in 2015 found by EWG.org which on average was 1000 X the public health goal could wash into peoples yards & farms in the storms and flood from climate change change.

Holland & Knight

560 Mission Street, Suite 1900 | San Francisco, CA 94105 | T 415.743.6900 | F 415.743.6910
Holland & Knight LLP | www.hklaw.com

Letitia D. Moore
+1 415-743-6948
Letitia.Moore@hklaw.com

April 22, 2024

Sent via email

Supervisor Federal D. Glover
Supervisor Ken Carlson
Supervisor Diane Burgis
Supervisor Candace Andersen
Supervisor John M. Gioia
Chair Kevin Van Buskirk
Director John Kopchik

Re: Comments on Contra Costa County 2024 Climate Action Plan, 2045 General Plan, and General Plan and Draft Environmental Impact Report

Dear Supervisors, Commissioner and Director:

On behalf of the Committee for Industrial Safety (CIS), we respectfully submit this comment letter to ensure that Contra Costa County adopts an internally consistent and legally sufficient Contra Costa County 2045 General Plan and updated 2024 Climate Action Plan (CAP), as required by California Government Code Section 65300.5, and fully complies with the California Environmental Quality Act (CEQA), Public Resources Code § 21000 et seq., and the CEQA Guidelines, California Code of Regulations, title 14, § 15000 et seq. (CEQA Guidelines) with respect to the County's environmental impact report (EIR) for the 2045 General Plan and 2024 CAP. CIS is a nonprofit association, its purpose is to educate the public and advocate on matters of refinery safety and related regulatory policy and environmental protection. Contra Costa County is home to workers, communities and facilities associated with CIS and served by CIS educational and advocacy efforts.

Oil and gas manufacturing companies are the largest private employers and one of the highest paying industries in Contra Costa County. Contra Costa Conservation & Development [Largest Employers](#) (accessed April 20, 2024); California Employment Development Department [Major](#)

[Employers in Contra Costa County](#) (accessed April 20, 2024); Data USA [Contra Costa County](#) (accessed April 20, 2024). The 2045 General Plan and 2024 CAP propose to shut down the largest private employers, eliminating those higher paying jobs, and the EIR neither identifies nor analyzes any potential impacts from this substantial change in the workforce, tax base, manufacturing, and transport of goods in the County. Implementation of the climate action policies and measures in the 2045 General Plan and 2024 CAP will have significant impacts on workers, communities and multiple industries in Contra Costa County, on their public, environmental and economic health and vitality, but no attempt is made in the EIR to describe, evaluate or address such impacts. Many of those impacts will fall on communities already disadvantaged by the uneven distribution of economic, educational and social resources.

General Plan and CAP Not Consistent

The 2024 CAP is integral to administration of the 2045 General Plan, its implementation is a General Plan requirement, and the 2024 CAP is fully enforceable under CEQA. Consistency between the General Plan and the CAP, and internal consistency within the General Plan, are therefore important elements to a legally adequate General Plan. General Plans that are internally inconsistent are illegal, and courts have and may continue to impose the draconian remedy of halting all new development pending adoption of an internally consistent and legally adequate General Plan. *See, e.g., Save El Toro Assn. v. Days (1977) 74 Cal.Appl. 3d 64.* Failure to address inconsistencies between the 2045 General Plan and the 2024 CAP invites challenges, puts future development at risk, and unnecessarily wastes public resources.

Given the cultural, ethnic, social and economic diversity of the communities in Contra Costa County, promotion of environmental justice and economic development are significant policy imperatives for Contra Costa County residents and businesses. The 2045 General Plan consistently prioritizes efforts to address environmental justice issues in General Plan goals, policies and actions. Within the Stronger Communities Element of the General Plan, the Environmental Justice section states that the County’s intent is to reduce the disadvantages and burdens on these overburdened and vulnerable communities. The 2024 CAP however does not align with the General Plan environmental justice priorities and fails to implement key General Plan environmental justice priorities.

The 2045 General Plan and 2024 CAP identify communities in and around North Richmond, San Pablo, Montara Bay/Rollingwood, Rodeo, Crockett, Vine Hill/Mountain View, Pacheco, Clyde, and Bay Point as “Impacted Communities.” General Plan, Figure SC-1. As you know, Impacted Communities are “unincorporated communities in Contra Costa County that are disproportionately burdened by pollution or face disproportionate social or health vulnerabilities.” General Plan, p. 3-3. These communities are burdened by proximity to heavy industry, a range of pollution sources, and a sustained lack of public and private infrastructure and community services investments. Residents of these communities also benefit from “the jobs, tax benefits, and local energy production” provided by the “high concentration of refineries and other large industrial facilities” in their communities. However, these same communities, residents and businesses, may also be particularly vulnerable to the impacts of climate change. Accordingly, the General Plan sets “a priority of the County to protect Impacted Communities

from additional harm and progressively improve the quality of life and health outcomes of residents.” General Plan, p. 3-3.

The 2045 General Plan, in support of the equitable distribution of social and economic resources to reduce disproportionate burdens on Impacted Communities, calls for

- Partnerships between residents, workers, business/industry, environmental and environmental justice advocates, institutions and governments to support industry transitions that will provide living-wage jobs;
- Streamline permitting process for new development and redevelopment that promotes community objectives in Impacted Communities;
- Development of neighborhood-serving retail and service uses, cultural and community events, and public infrastructure; and
- Negotiation of community benefit agreements (CBAs) to address the expressed needs of Impacted Communities. See, General Plan Goal SC-1 and Policies SC-P1.1, SC-P1.2, SC-P1.3, SC-P1.4, SC-P1.5, and SC-P1.6.

The 2045 General Plan emphasizes enhanced opportunities for high-quality jobs and workforce development in Impacted Communities. The General Plan specifically sets as a goal “Access to and expansion of high-quality job training, job opportunities, and economic resources so that residents in Impacted Communities can acquire safe jobs, earn a living wage to support their families, and build shared prosperity.” Goal SC-8. For Impacted Communities, the General plan similarly emphasizes reducing barriers to and improving healthcare, increasing quality affordable housing, and providing enhanced fresh, healthy and affordable food opportunities, in those communities.

With respect to climate change impacts, the 2045 General Plan specifically prioritizes protection of Impacted Communities.

General Plan Policy HS-P4.4: Prioritize efforts to protect Impacted Communities and other vulnerable populations from the impacts of climate change, including through improving community capacity and meaningfully involving community members in decision making.

In contrast to the 2045 General Plan, the 2024 CAP Strategy and Implementation Actions do not prioritize efforts to protect Impacted Communities. For example, although a “high concentration of refineries and other large industrial facilities” are located in Impacted Communities, unlike the General Plan, the 2024 CAP Strategy CE-5 does not prioritize access to high-quality jobs, economic resources, and a living wage for Impacted Communities. The proposed climate action strategies advocate phasing out the largest private employers and associated higher paying jobs and tax benefits, located primarily in Impacted Communities, but does not correspondingly prioritize economic development and job creation in those Impacted Communities. The 2024 CAP does not promote

- Industry transitions that will provide living-wage jobs in Impacted Communities;

- Streamline permitting process for new development and redevelopment that promotes community objectives in Impacted Communities;
- Development of land uses and public infrastructure in Impacted Communities; or
- Community benefit agreements (CBAs) to address the needs of Impacted Communities.

The 2024 CAP does little or nothing to further the County’s environmental justice objectives, particularly in the context of economic sustainability, wealth creation or workforce development.

Additional inconsistencies are visible between strategies to (i) “Provide access to affordable, clean, safe, and healthy housing and jobs,” [CAP Strategy CE-1] (ii) implementing actions to phase out existing industries that provide high-paying jobs and tax benefits (employers characterized as “heavily polluting and extractive industries”) [CAP Strategy CE-5 Action], and (iii) “measures to achieve near-zero emissions for large commercial or industrial projects” [General Plan Policy HS-P1.8]. Policies and implementing actions in the 2045 General Plan Health and Safety element identify regulatory agencies and initiatives working to control and reduce emissions and exposures from heavy industrial facilities in Impacted Communities. General Plan and CAP goals and policies also identify job security as a priority for the County. Conversely, the 2024 CAP also seeks to phase out those same highly regulated and controlled, jobs producing industrial facilities.

We note that the County has otherwise promoted environmental justice and economic development initiatives designed to facilitate continuing dialogue with environmental justice communities, workers, and businesses, and advance strategies to create thousands of new living-wage jobs, emphasize local workforce hiring, and protect and build the regional tax base. Such environmental justice and economic development activities identified by the Contra Costa County Department of Conservation & Development in November 2023 included,

- Northern Waterfront Economic Development Initiative,
- Just Transition Economic Revitalization Plan (JTERP),
- Bay Area Good Jobs Partnership for Equity (Community Economic Resilience Fund),
- Contra Costa Refinery Transition Partnership, and
- Refinery Community Benefits Agreements.

While the 2023 Interim CAP Progress Report identifies some implementation activity with the JTERP and the County’s support of AB 844, it does not reflect any significant progress on addressing environmental justice and economic development. Reversing historic injustices, while retaining and attracting businesses, jobs, workers and industry, must be an integral part of implementation of the General Plan and the County’s strategic climate action plans. Nevertheless, the 2045 General Plan, 2024 CAP and EIR also fail to address the adverse impact on past and current efforts in the County directed at environmental justice issues and economic development in Impacted Communities.

Finally, our review of the 2024 CAP indicates that the climate action strategies are also inconsistent with the County’s Housing Element, which prioritizes preserving existing affordable housing and increasing the supply of housing, particularly affordable housing, in the County.

Climate change strategies that reduce tax benefits from jobs producing industry and reduce opportunities for high-paying jobs, as well as increase costs on existing and new housing, are inconsistent with the goals of the Housing Element. Increasing and improving housing opportunities requires stable incomes, a stable tax base, and reliable economic and jobs growth. The County must revise the 2024 CAP to better align with the 2045 General Plan environmental justice and housing goals.

EIR Fails to Comply with CEQA

The Project addressed by the Draft EIR is the implementation of the proposed 2045 General Plan and 2024 CAP. The EIR is “the heart of CEQA.” and provides an “environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.” *Laurel Heights Improvement Ass’n v. Regents of the Univ. of Cal.* (1998) 47 Cal.3rd 376, 392 (*Laurel Heights*). An EIR is intended to demonstrate that the lead agency “has, in fact, analyzed and considered the ecological implications of its action.” *Id.* The EIR, however fails to fully and accurately inform the public and decision makers of environmental consequences associated with the CAP and the General Plan, and ways to mitigate those consequences, and thus fails to achieve CEQA’s fundamental purpose. To comply with the law, the County must revise the EIR to cure the CEQA errors identified below, and it must recirculate the revised draft so that the public and decision makers have a fair opportunity to assess the full scope of the environmental impact of the General Plan and CAP climate action strategies.

The 2045 General Plan and 2024 CAP propose to shut down the oil and gas industry, eliminating the County’s largest private employers, and the associated higher paying jobs, tax benefits, and goods and services provided locally by those local employers (goods and services that serve the County, region and the State). The EIR fails to identify and analyze any potential impact to the production, export and import of goods and products in the County, or the adverse impact on jobs, income and revenue for public services in the County, particularly for Impacted Communities. In addition to jobs displacement and loss of revenue and locally produced goods, our communities will also be subject to increased traffic, air quality and hazard impacts from the need to import from outside the region and the state those goods and services that are currently produced locally. None of these or other potential adverse impacts are evaluated in the EIR.

Climate action strategies under the 2024 CAP also include incentivizing new buildings to be low-carbon or carbon neutral, retrofitting existing buildings and facilities to reduce energy use, and increasing the amount of electricity used and generated from renewable sources in Contra Costa County. Physical changes will be required by these energy strategies. The EIR fails to adequately evaluate the environmental impact of these climate action strategies. Implementation of the 2045 General Plan and 2024 CAP will result in relocation or construction of new or expanded energy facilities to transition to increased use of sources of renewable energy generated in the County. Additionally, substantial increase in County sources of renewable energy will be needed to accommodate transition to all electric new residential buildings, hotels, offices and retail. CAP Strategy B-1. Nevertheless, the EIR determines that the General Plan and

CAP would not result in new or expanded energy facilities that would cause significant environmental effects.

The EIR erroneously concludes that the CAP does not propose land use changes and would not directly result in relocation or construction of new or expanded energy facilities, and that any new or expanded facilities resulting from the proposed General Plan ‘would undergo its own review to mitigate potentially significant environmental effects.’ EIR, p. 5.6-34. Consequently, the EIR does not identify energy transition impacts for the CAP, nor does it evaluate any air quality, traffic, hazards, employment, water supply, or wastewater impacts of the transition to and creation of new energy facilities. Furthermore, the EIR fails to quantify the number, size and scope of renewable energy facilities that would result from General Plan and CAP policies/strategies, and fails to evaluate the potential environmental impacts or provide program-based mitigation measures. Potential impacts from development of new renewable energy facilities in the County include heat island impacts for solar panels, wildlife impacts related to migrating birds and solar and wind facilities, water supply impacts from cleaning solar panel, and construction and other impacts related to development of a varied range of local energy storage, transmission and generation facilities.

The 2045 General Plan, 2024 CAP and EIR advocate the shutdown of the County’s largest private employers, without analysis or discussion of the viability of that proposal, and without identifying or evaluating any potential adverse impacts. The EIR fails to analyze the adverse impacts such proposed climate action strategies will have on jobs, population, housing, revenue, public services, traffic, air quality, and the economy. As such, the 2045 General Plan, 2024 CAP and EIR are fundamentally flawed and promote flawed projections that leave our workers, communities and businesses facing potentially disastrous circumstances without analysis or realistic options or alternatives.

Sincerely yours,

HOLLAND & KNIGHT LLP

A handwritten signature in black ink, appearing to read 'Letitia', with a long horizontal flourish extending to the right.

Letitia D. Moore

cc: William R. Nelson, Principal Planner

Addressees:

Supervisor Federal D. Glover - Federal.glover@bos.cccounty.us; district5@bos.cccounty.us

Supervisor Ken Carlson - Supervisorcarlson@bos.cccounty.us

Supervisor Diane Burgis - diane.burgis@bos.cccounty.us; supervisor_burgis@bos.cccounty.us

Supervisor Candace Andersen - supervisorandersen@bos.cccounty.us

Supervisor John M. Gioia - John.Gioia@bos.cccounty.us; john_gioia@bos.cccounty.us

Chair Kevin Van Buskirk - vanbuskirk1691@gmail.com

Director John Kopchik - john.kopchik@dcd.cccounty.us

Cc: William R. Nelson - Will.Nelson@dcd.cccounty.us

CALIFORNIA NATIVE PLANT SOCIETY
East Bay Chapter
www.ebcnps.org
P.O. Box 5597, Elmwood Station, Berkeley, CA 94705

April 22, 2024

Will Nelson, Principal Planner
Contra Costa County
Department of Conservation and Development
30 Muir Road
Martinez, CA 94553

via email: Will.Nelson@dcd.cccounty.us



RE: Comments on Draft Contra Costa 2040 General Plan

Dear Mr. Nelson,

The California Native Plant Society, East Bay Chapter (CNPS) submits the following recommendations for the Conservation, Open Space, and Working Lands Element of the Draft 2040 General Plan. We have also submitted these comments on the Envision Contra Costa website.

Thank you and county staff for setting up evening workshops to discuss the draft plan. We believe that these recommendations further support the conservation goals and values held by Contra Costa County and many county residents. We are available to describe the reasons for the recommended minor, but important, changes and additions.

Below are images that capture the wording in the draft plan with recommended additions and revisions.

COS-P1.3  
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.*

CNPS East Bay recommends that the county not inadvertently encourage the conversion of parklands to urban uses as an appropriate or desirable development option in the General Plan/Envision 2040. Important ecological and natural resource areas are often the result of years of site resource inventories and citizen advocacy in trust that natural areas and parks will receive ongoing protection. If someone wants to open the door to try to convert natural resource areas and parks to urban uses, they will. This policy is unnecessary and appears to contradict the other policies in the conservation and open space section.

Recommendation: We recommend deletion of COS P1.3.

COS-P4.3

Require a biological resources assessment prepared according to State and federal protocols for projects with the potential to impact rare, threatened, endangered, or special-status species or their habitat, and implement appropriate mitigation for identified impacts.*

CNPS East Bay requests that the following native plant categories (in bold italics) be part of this policy to conform to California Department of Fish and Wildlife (CDFW) biological resource assessment protocols,* and to commit to conserving the area's unique and valuable native flora over the decades ahead.

Recommendation: Require a biological resources assessment prepared according to State and federal protocols for projects with the potential to impact rare, threatened, and endangered special-status species, ***sensitive natural plant communities, and locally rare native plants*** and their habitats, and implement appropriate mitigation for identified impacts

*reference: [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#), CDFW, 3/20/18

COS-P4.6

Require appropriately-timed, comprehensive floristic and vegetation surveys prepared according to State and federal protocols when development is proposed on land with potentially suitable habitat for special-status plant species, including areas mapped by the California Native Plant Society as Botanical Priority Protection Areas.*

Again, we request that the following native plant categories in bold italics be included to conform to California Department of Fish and Wildlife (CDFW) biological resources assessment

protocols, and to commit to conserving the county's unique and valuable indigenous native flora over the decades ahead.

Recommendation: Require appropriately-timed, comprehensive floristic and vegetation surveys prepared according to State and federal protocols when development is proposed on land with suitable habitat for special-status plant species, ***sensitive natural plant communities, and locally rare plants***, including areas mapped by the California Native Plant Society as Botanical Priority Protection Areas.

Note: To ensure that conservation action will follow appropriately timed, comprehensive floristic surveys, including for Botanical Priority Protection Areas, the strengthening of **COS-P4.7, COS-P6.1, POS-P6.4**, and an additional COS-Policy statement, is required.


COS-P4.7

Require avoidance and protection of sensitive ecological resources not approved for disturbance or removal during project entitlement, and require restitution in exceedance of standard mitigation ratios for inadvertent damage to these resources.*

By definition, it seems that sensitive ecological resources not approved for removal require avoidance and protection. To provide actionable guidance from this policy, CNPS East Bay recommends the following wording in bold italics:

*Recommendation: **The norm and standard for project entitlement will be to avoid and protect sensitive ecological resources, including special-status plants, sensitive natural plant communities, locally rare plants, and the intact pollinator and wildlife habitat they support.***

Disturbance or removal of sensitive ecological resources not approved for disturbance or removal during project entitlement will require restitution in exceedance of standard mitigation ratios for inadvertent damage to these resources.

COS-P6.1  Preserve natural woodlands and significant trees, particularly mature native species.*

Preserving natural woodland and significant trees, particularly mature native trees, is ecologically and aesthetically valuable for many other reasons. At the same time, preserving natural woodlands and significant trees needs to include preserving the ecologically and


aesthetically valuable native shrubs, grasses, and wildflowers associated with oak woodlands and other native tree communities. Natural woodland and native tree protection without preserving the associated native shrub and groundcover species can result in acres of trees with an understory of weeds, including flammable and ecologically invasive weeds.

Recommendation: Preserve natural woodlands and significant trees, particularly mature native species **and their associated native shrub, forbs, and grasses.**

Additional COS-P6.1a

We recommend a companion policy to P6.1 that also recognizes the ecological and social values of preserving the rich and diverse native shrublands and grasslands of the county.

Recommendation: **Preserve areas of intact native shrublands and grasslands that are recognized as sensitive natural plant communities or that provide wildlife corridors or valuable pollinator, avian, and wildlife habitat.**


COS-P6.2 

Encourage planting and propagation of native trees throughout the county to enhance the natural landscape, provide shade, sustain wildlife, absorb stormwater, and sequester carbon.

1

CNPS East Bay recommends an ecological approach to native tree planting, which also encourages the planting of habitat-supporting native shrubs, forbs, and grasses (see bold italics).

Recommendation: Encourage the planting of native trees and **habitat-supporting native shrubs, forbs, and grasses** throughout the county to enhance the natural landscape, provide shade, sustain wildlife, absorb stormwater, and sequester carbon.

COS-P6.4 

Encourage removal of invasive, non-native tree species, especially those known to pose threats to public safety.

We heartily support this recommendation, but ask that the county take a more active role by *supporting*, rather than only encouraging, invasive plant removal. In addition to public safety threats, we ask that ecological harm be included as a priority, too.

Recommendation: Support actions that result in the removal of non-native, invasive trees, shrubs, and grassland weeds, especially those **that are ecologically harmful** or pose threats to public safety.

Actions

.....

COS-A6.1



Update County Ordinance Code Chapter 816-6 – Tree Protection and Preservation, to enhance tree protections and strengthen mitigation requirements/restitution for tree removal.*

Due to the root and other damage that can occur to trees by allowing construction work too close to the drip line, the tree root protection [recommendations of California Oaks](#), and the climate change-related stress trees will likely be facing in the coming decades, we recommend

Recommendation: Update County Ordinance Code Chapter 816-6 – Tree Protection and Preservation to enhance tree protections, **including expansion of the tree root protection zone beyond the dripline** and strengthening mitigation requirements/restitution for tree removal.*

Thank you for the opportunity to comment on the Draft General Plan 2040. We support and look forward to policies and actions that will conserve Contra Costa County's remarkable natural beauty and diversity in the years ahead.

Sincerely,

Lesley Hunt

Lesley Hunt

President

Jim Hanson

Jim Hanson

Conservation Chair

From: Colin Clarke <cclarke@ccta.net>

Sent: Monday, April 22, 2024 5:00 PM

To: Will Nelson <Will.Nelson@dcd.cccounty.us>

Subject: comments on draft Climate Action Plan and General Plan update for 2040

Hi Will,

Thank you for the opportunity to review.

I'd be happy to coordinate and collaborate more if it's possible to review a copy in Microsoft Word Tracked Changes, discuss, etc.

RE: Clean Transportation Network (TR)

"private vehicle travel [can be] convenient". replace "is" which is inaccurate given decades of data showing traffic congestion and associated time delay, which is widely known to feel inconvenient.

"significant volumes" feels unimportant and meaningless to most readers and the general public if not quantified at least within a credibly estimated range of numbers. Did the County use Artificial Intelligence (AI) or ChatGPT to improve the contents of this policy document?

"profound impacts" include fatalities and severe injuries. Add mentions of Nov2023-BoS-adopted Vision Zero policy and Countywide Vision Zero policy (Sep2021 adopted by CCTA Board). Add beyond "local [regional, statewide, national, and global] environmental quality" to account for fossil fuels' contributions toward global warming, climate change, etc. which literally has affected nations across the world, including sea-level-rise, extreme heat, flooding, extreme weather, fires, etc.

Does the County intend to establish a quantified baseline for Scope 1, 2, and

3 GHG emissions? And establish action-oriented strategies to reduce or minimize each?

For more ideas, collaboration, etc. please feel free to coordinate and contact CCTA Planning Department

Colin B. Clarke, AICP

cclarke@ccta.net 925-256-4726

Hopefully the County can replace

"If residents and workers are driving, they are in zero-emission vehicles" with language that explicitly prioritizes the most efficient movement of people, and vehicle miles traveled (VMT) reduction (e.g., toward traffic congestion which would be equivalently inconvenient/delayed even if fleet is all ZEVs instead of ICE vehicles), transit vehicles, lighter-duty (lower weight) vehicles, and encourages maximum occupancy of each vehicle.

add/provide a credible-sourced estimated range of number of annual hours of "time lost in traffic" for residents, visitors, workers, etc. throughout Contra Costa.

"five miles or [fewer]"... grammar correction. Micromobility devices can be publicly subsidized and commonly shared, and not only personally owned.

Is there any mention of...? land use regarding sustainable aviation fuel, agricultural development, ground transportation fuels, vertical farming to reduce VMT, etc.

Can the Transportation section be revised (in coordination with CCTA, in Microsoft Word Tracked Changes, and) to be more transformative? e.g., prioritize the most efficient modes of transportation with a primary focus on people and customer experience. Equity, safety, public health, livability, exercise and active transportation, lighter weight lighter duty vehicles, middle modalism "golf cart"-sized vehicles regionally. Will the County advocate for (funding and) implementation of...? a more contiguous, complete, and connected low-stress bike network by 2030 instead of leaving timeline for construction more open-ended for such a long-range plan when there is an active, adopted climate emergency.

What happened to the strategies that were adopted in the Climate Action Plan?

Measure LUT 4:

Reduce vehicle miles traveled. Action Items:

1. Collaborate with BART and other transit providers to increase ridership in the county.
2. Partner with waste haulers and other fleets with regular routes to reduce the frequency of routes where possible.
3. Support and increase the use of carpooling services such as rideshare or casual carpool.
4. Continue to promote voluntary trip reduction programs such as school buses, Rideshare, Spare-the-Air Days, Bike to Work Day, employer shuttles, and alternative work schedules.
5. Work to increase densities within half a mile of BART and Amtrak stations, and within a quarter of a mile of stops for express bus routes.
6. Prioritize alternative mode access to BART and other transit stations.
7. Continue to explore funding transit with development applications and other alternative transportation finance methods.
8. Continue the County's policy of encouraging the establishment of Priority Economic Development Areas in residential communities.

Why show a dead/inactive, old and unhealthy technology of a "chimney" on the home logo circle that includes a leaf?

All the Best,

Colin B. Clarke, AICP

Planning Department, CCTA.net > Planning

925-256-4726

2999 Oak Road, Suite 100, Walnut Creek, CA 94597



April 22, 2024

Sent via email

Contra Costa County
Department of Conservation and Development
30 Muir Road
Martinez, CA 94553
email@envisioncontracosta2040.org

Re: Draft Contra Costa County 2045 General Plan

Dear Contra Costa County Department of Conservation and Development:

These comments are submitted on behalf of the Center for Biological Diversity (the “Center”) regarding the Draft Contra Costa County 2045 General Plan (“Plan”). The Center supports the overarching goals of the Plan and commends the County on their sustainable and equitable visions for the region. The Center provides these comments in an effort to strengthen the Plan and ensure that those goals are realized through specific and measurable targets and enforceable policies.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center and its members have worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life in Contra Costa County and the surrounding region.

I. The County Must Prioritize Public Safety and Prohibit New Development in Very High Wildfire Zones

The Center appreciated the Plan’s proposed HS-P7.1 policy that would “deny applications for new residential subdivisions in Very High Fire Hazard Severity Zones and discourage residential subdivisions in High Fire Hazard Severity Zones.” However, this does not go far enough because new housing can still be built in these dangerous areas, as acknowledged by policy HS-P4.3 that only discourages new below-market-rate housing in High and Very High Fire Hazard Severity Zones.

Almost all contemporary wildfires in California, 95% to 97%, are caused by human sources such as power lines, car sparks and electrical equipment.ⁱ Increasing sprawl development in highly fire-prone wildlands also increases unintentional ignitions and puts more people in danger.ⁱⁱ

Wildfire is an important ecological process for many ecosystems. For millennia, Indigenous cultural burning and lightning strikes drove ecosystem-specific fire regimes. But the genocide of Native peoples and the criminalization of fire practices, along with 200 years of reckless land-use planning, have altered historical fire regimes.^{iii,iv} This, in combination with climate change causing more extreme fire weather, longer fire seasons, and larger areas burned, has made wildfires more destructive to people and communities.^v

Since 2016 more than 200 people in California have been killed in wildfires, more than 50,000 structures have been burned down, hundreds of thousands have had to evacuate their homes and endure power outages, and millions have been exposed to unhealthy levels of smoke and air pollution.^{vi}

Poor air quality from fine particulate matter (PM_{2.5}) in wildfire smoke has both acute and long-term health effects. Hospital visits for respiratory symptoms (*e.g.*, asthma, acute bronchitis, pneumonia or chronic obstructive pulmonary disease) have been shown to increase during and/or after wildfire events.^{vii}

There is also evidence that increases in all-cause mortalities and hospital visits for cardiovascular symptoms (*e.g.*, congestive heart failure, ischemic heart disease, and myocardial infarction) are also linked to wildfires.^{viii} Epidemiologists recently found that increased exposure to wildfire smoke may also be linked to higher rates of dementia.^{viii} And wildland firefighters are suffering disproportionately high rates of cancer and other serious diseases, likely due to extreme smoke exposure,^{ix} as well as mental health issues due to extended fire seasons and working extended shifts away from their families.^x

In addition to particulate matter from smoke, harmful and toxic substances from burning structures, like lead and zinc, are released in the air and can travel many miles to other communities.^{xi} Such impacts disproportionately affect low-income and minority communities and vulnerable members of the population, like children, the elderly, and people with pre-existing health conditions.

The economic impacts of wildfires affect residents throughout the state. Wildfires in 2018 cost Californians an estimated \$148.5 billion in capital losses, health costs related to air pollution exposure, and indirect losses due to broader economic disruption cascading along regional and national supply chains.^{xii} And the cost of emergency fire suppression continues to skyrocket year after year.

Thus, it is imperative that the County commit to reducing these impacts and only build in areas that are not designated very high wildfire severity zones.

II. The County Should Require the Implementation of Policies that Reduce Impacts to Wildlife Movement and Habitat Connectivity.

As detailed in a 2021 Center Report (Yap et al., 2021), roads and development create barriers that lead to habitat loss and fragmentation, which harms native wildlife, plants, and people. As barriers to wildlife movement, poorly-planned development and roads can affect an animal's behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Brehme et al., 2013; Ceia-Hasse et al., 2018; Haddad et al., 2015; Marsh & Jaeger, 2015; Mitsch & Wilson, 1996; Trombulak & Frissell, 2000; van der Ree et al., 2011). For example, habitat fragmentation from roads and development has been shown to cause mortalities and harmful genetic isolation in mountain lions in southern California (Ernest et al., 2014; Riley et al., 2014; Vickers et al., 2015), increase local extinction risk in amphibians and reptiles (Brehme et al., 2018; Cushman, 2006), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López et al., 2010; Kantola et al., 2019; Loss et al., 2014), and alter pollinator behavior and degrade habitats (Aguilar et al., 2008; Goverde et al., 2002; Trombulak & Frissell, 2000).

The Road Ecology Center at UC Davis estimated that reported wildlife-vehicle collisions with large mammals caused over one billion dollars (\$1,000,000,000) in economic and social costs to Californians from 2016 to 2020 (Shilling et al., 2021). Many of these types of collisions go unreported or under-recorded, as some people may choose not to report crashes, people may not see animal carcasses on the road or in the right-of-way, or wounded animals move beyond the right-of-way before they die. Therefore, the wildlife death tolls, injuries to people, and costs could be much greater.

Wildlife crossing structures can increase driver safety and are highly effective at reducing wildlife-vehicle collisions. Numerous readily available measures exist to avoid, minimize, and/or mitigate the impacts of roads on wildlife, including but not limited to the placement of exclusion/directional fencing and the construction of wildlife-friendly underpasses, overpasses, culverts, and elevated sections of road in key wildlife connectivity areas, and they have proved successful in other states. For example, wildlife passage features reduced vehicle-wildlife collisions along Highway 9 in Colorado by 92% (Kintsch et al., 2021) and along the I-15 in Utah by 98.5% (Bissonette & Rosa, 2012). Properly sited and designed wildlife passage features make roads safer for people and wildlife, which saves costs to society from fewer wildlife vehicle collisions (Center for Large Landscape Conservation, 2020). These safety measures can be applied to new transportation infrastructure as well as retrofitted to existing infrastructure to effectively reduce collisions.

Habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Damschen et al., 2019). The authors conclude that efforts to preserve and enhance connectivity will pay off over the long-term (Damschen et al., 2019). In addition, connectivity between high quality habitat areas in heterogeneous landscapes is important to allow for range shifts and species migrations as climate

changes (Cushman et al., 2013; Heller & Zavaleta, 2009; Krosby et al., 2018). Loss of wildlife connectivity decreases biodiversity and degrades ecosystems. It also prevents the reestablishment of native species, like wolves, as was seen with the dispersing wolf OR93 who traveled south from Oregon and roamed California until it was killed by a vehicle strike in Kern County in less than a year.^{xiii}

Edge effects of roads and development in and adjacent to open space will likely impact key, wide-ranging predators, such as mountain lions and bobcats (Crooks, 2002; Delaney et al., 2010; Lee et al., 2012; Riley et al., 2006; Smith et al., 2015, 2017; Vickers et al., 2015; Wang et al., 2017), as well as smaller species with poor dispersal abilities, such as song birds, small mammals, and herpetofauna (Benítez-López et al., 2010; Cushman, 2006; Kociolek et al., 2011; Slabbekoorn & Ripmeester, 2008). Limiting movement and dispersal can affect species' ability to find food, shelter, mates, and refugia after disturbances like fires or floods. Individuals can die off, populations can become isolated, sensitive species can become locally extinct, and important ecological processes like plant pollination and nutrient cycling can be lost. Negative edge effects from human activity, such as traffic, lighting, noise, domestic pets, pollutants, invasive weeds, and increased fire frequency, have been found to be biologically significant up to 300 meters (~1000 feet) away from anthropogenic features in terrestrial systems (Environmental Law Institute, 2003)

The County must also consider corridor redundancy (*i.e.* the availability of alternative pathways for movement) because it allows for improved functional connectivity and resilience. Compared to a single pathway, multiple connections between habitat patches increase the probability of movement across landscapes by a wider variety of species, and they provide more habitat for low-mobility species while still allowing for their dispersal (Mcrae et al., 2012; Olson & Burnett, 2013; Pinto & Keitt, 2008). In addition, corridor redundancy provides resilience to uncertainty, impacts of climate change, and extreme events, like flooding or wildfires, by providing alternate escape routes or refugia for animals seeking safety (Cushman et al., 2013; Mcrae et al., 2008, 2012; Olson & Burnett, 2013; Pinto & Keitt, 2008).

Corridor redundancy is critical when considering the impacts of climate change on wildlife movement and habitat connectivity. Climate change is increasing stress on species and ecosystems, causing changes in distribution, phenology, physiology, vital rates, genetics, ecosystem structure and processes, and increasing species extinction risk (Warren et al., 2011). A 2016 analysis found that climate-related local extinctions are already widespread and have occurred in hundreds of species, including almost half of the 976 species surveyed (Wiens, 2016). A separate study estimated that nearly half of terrestrial non-flying threatened mammals and nearly one-quarter of threatened birds may have already been negatively impacted by climate change in at least part of their distribution (Pacifci et al., 2017). A 2016 meta-analysis reported that climate change is already impacting 82 percent of key ecological processes that form the foundation of healthy ecosystems and on which humans depend for basic needs (Scheffers et al., 2016). Genes are changing, species' physiology and physical features such as body size are changing, species are moving to try to keep pace with suitable climate space, species are shifting their timing of breeding and migration, and entire ecosystems are under stress (Cahill et al., 2012; Chen et al., 2011; Maclean & Wilson, 2011; Parmesan, 2006; Parmesan & Yohe, 2003; Root et al., 2003; Warren et al., 2011).

It is widely recognized that the continuing fragmentation of habitat by humans threatens biodiversity and diminishes our (humans, plants, and animals) ability to adapt to climate change. In a report for the International Union for Conservation of Nature (IUCN), world-renowned scientists from around the world stated that “[s]cience overwhelmingly shows that interconnected protected areas and other areas for biological diversity conservation are much more effective than disconnected areas in human-dominated systems, especially in the face of climate change” and “[i]t is imperative that the world moves toward a coherent global approach for ecological connectivity conservation, and begins to measure and monitor the effectiveness of efforts to protect connectivity and thereby achieve functional ecological networks” (Hilty et al., 2020).

While the Plan does a good job at emphasizing the need for protecting wildlife connectivity and even listing some policies that would protect key linkage areas (COS-P4.4) and implement so design standards (COS-P4.5 and COS-A4.2), these are undermined by the passive language that does not require the implementation of these measures.

The Plan should require road and highway projects to avoid large intact habitat areas and areas that are important for wildlife connectivity. The Plan should also specifically require that maintenance and new road projects implement adequate wildlife crossing infrastructure (including direction fencing if needed) with protected habitat on both to reduce impacts to wildlife movement and habitat connectivity. The County should consult biologists from CDFW, Caltrans, and other on-the-ground organizations and institutions, including Tribes, for such projects.

In developing and adopting such measures, it is important to consider that different species have different behaviors and needs that affect how they move. For example, smaller species with poor dispersal abilities, like rodents and herpetofauna, would require more frequent intervals of crossings compared to larger wide-ranging species, like mountain lions or coyotes, to increase their chances of finding a crossing. Gunson et al. (Gunson et al., 2016) recommend that crossing structures generally be spaced about 300m (~0.19mi) apart for small animals when transportation infrastructure bisects large expanses of continuous habitat, though they recognize that some amphibians may need more frequent crossings no more than 50m (~0.03mi) apart. And for many amphibian and reptile species, undercrossings should have grated tops so that the light and moisture inside the crossings are similar to that of the ambient environment. (Brehme & Fisher, 2020) and (Langton & Clevenger, 2021) also provide additional guidance regarding amphibian crossings. Therefore, multiple crossings designed for different target species may be required. In-depth analyses that include on-the-ground movement studies of which species are moving in the area and their home range area, habitat use, and patterns of movement are needed to determine how to best implement such crossings. In addition, associated crossing infrastructure (*e.g.*, exclusionary fencing appropriate for target species, berms to buffer crossings from sound and light) should be included to improve chances of wildlife using crossings, and such crossings and associated infrastructure should be designed and built in consultation with local and regional experts, including agency biologists. And to improve the effectiveness of any wildlife crossings, there should be protected habitat on both sides of the crossing; therefore, mitigation should also include acquiring unprotected lands on both sides of the roads where a

wildlife crossing would be implemented, again, in consultation with local conservation organizations and stakeholders, and preserving and managing those lands in perpetuity to ensure that the wildlife crossings and associated infrastructure remain functional over time.

Additionally, the County should implement a policy that requires the best practices for incorporating wildlife friendly measures into new developments. These include, but are not limited to:

- a. Setbacks on urban properties to provide a buffer for resource areas.
- b. Clustering of development to maximize ecological and conservation benefits.
- c. Lighting, fencing, screening, and landscaping/vegetation that support, and do not interfere with, wildlife migration and other conservation purposes

All of which are already listed in policy COS-A4.2, but not required.

III. The Plan Can and Should Do More to Reduce, Avoid, Or Mitigate Impacts to Greenhouse Gas Emissions and Climate Change.

California is at the forefront of the climate crisis. Poor land-use planning and extreme weather events have led to an onslaught of disasters harming communities and threatening the state's ecosystems and people's livelihoods. Continuing business as usual and increasing capacity on existing roads for more carbon emissions will have significant impacts on the environment and local communities. It is therefore more critical than ever that the County adequately reduce, avoid or mitigate impacts of GHGs and climate change.

i. The Plan Should Prioritize Investment in Public Transportation.

Providing alternatives to single occupancy vehicle travel is essential to building an efficient, sustainable and equitable transportation system. Unfortunately, we have a long way to go if we are going to go to achieve this vision in the U.S. In 2013, it was reported that of all the U.S. daily commutes to work, 76.4% are of people driving alone.¹ According to the Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2015, our collective daily transportation in the U.S. constitutes about 27% of the total greenhouse gasses released.²

To change these trends, government agencies need to invest in alternative modes of transportation to not only make them cheaper to use, but more efficient than driving. While the Plan does include some initiatives around alternative modes of transportation including policy TR-A1.10 that would "support the establishment of a Bay Area-wide transit fare equity program that includes free or means-based transit passes for qualifying residents of Impacted Communities," the lack of specific targets and mandated programs ensures that no meaningful change will be achieved.

¹ McKenzie, Brian. Who Drives to Work? Commuting by Automobile in the United States: 2013. Rep. N.p.: American Community Survey Reports, 2015. Print.

² "Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2015." EPA. Environmental Protection Agency, 09 June 2017. Web. 26 June 2017.

Mandated goals on increasing public transportation usership should be articulated in the Plan. Some best practices include:

(1) Provide free public transit services for future residents and workers

This is virtually certain to result in significant ridership increases no matter where it is implemented. Evidence from previous studies indicate that ridership will usually increase from 20% to 60% in a matter of just a few months.³ One evaluation found that the net ridership increased by about 15% (about 45% during the off-peak periods) when there was no fee. This included the combined effects of an increase in trip frequency by prior users and an increase in the number of off-peak bus riders. Most new bus trips were diverted from other modes; very few were newly generated.⁴

(2) Implement Bus Only lanes

Building dedicated bus lanes are relatively cheap and quick to install, dramatically reduce congestion and increase efficiency. All of these benefits lead to increases in ridership. A summary of research suggests that bus lanes that reduce total transit door-to-door travel times by 5-15% will “by themselves increase urban peak ridership 2-9%.” The City of Denver found that ridership increased 2.8% in the first six months of their tactical transit lines (TTLs)’ operation, even though travel speed improvements were relatively modest (3-6%), likely due to the TTL being an expansion of existing lanes that had already been operational during peak hours when TTLs yield the greatest benefits.⁵

(3) Optimizing bus routes to minimize overlap and ensure coverage across the city in line with demand.

Regional planning allows resources to be used efficiently and effectively to serve the areas that need it most. Houston re-specified their service after the light rail transit (LRT) was put in place to reduce overlapping of these services and to ensure transit coverage in other areas of the city. This resulted in a 7% increase in ridership on local bus and light-rail from 2015 to 2016.⁶

(5) Providing high-frequency, reliable services.

The bus network can be divided into main routes and local routes, with different frequencies. Bus routes on main city arteries and roads used for longer distance travel will require a frequent service, at least every 15 minutes. This is the minimum frequency at which the service is usually considered good enough for travelers to turn up without consulting a schedule. On local routes, a

³ Studenmund, A. H., and David Connor. "The free-fare transit experiments." *Transportation Research Part A: General* 16.4 (1982): 261-269.

⁴ Ewing, Reid, and Robert Cervero. "Travel and the built environment: A meta-analysis." *Journal of the American planning association* 76.3 (2010): 265-294.

⁵ Gahbauer, John, and Juan Matute. "Best practices in implementing tactical transit lanes." (2019). <https://escholarship.org/uc/item/1tj0974b>

⁶ C40 Knowledge. "How to make public transport an attractive option in your city." Published August 2021. https://www.c40knowledgehub.org/s/article/How-to-make-public-transport-an-attractive-option-in-your-city?language=en_US

less frequent service may be sufficient, depending on demand and provided that the service operates punctually according to the timetable. São Paulo has implemented this dual frequency network timetable for the night shift, increasing night-time ridership by over 70%.⁶

(5) Building regular bus stops for easy access.

Ensuring accessibility and convenience is essential to increasing ridership. Providing more bus stops decreases the distance residents have to travel to access such services. In Barcelona, the maximum distance between transit stops in the new bus network is 350m. In Seattle, the bus network upgrade plan will increase the percentage of households within 800m of frequent transit routes from 43% in 2015, to 73% by 2040.⁶

ii. The Plan Should Adopt Available Nature-based Solutions.

The County should also look to nature-based conservation strategies, including protecting and preserving the County’s native habitats to store and sequester carbon locally to increase our chances of fighting the climate crisis in an effective and equitable manner. The County consists of large habitat areas that store and sequester significant amounts of carbon. As detailed in a 2023 Center report “Hidden in Plain Sight: California’s Native Habitats Are Valuable Carbon Sinks” (“2023 Center Report,” Yap et al., 2023), nonforest arid and semi-arid habitats can store carbon by keeping it from being released and sequester it by removing it from the atmosphere.

The Plan does commit to prioritizing investments in preserving land via policy LU-P2.2 that would “enhance the ULL’s effectiveness by supporting efforts to acquire and permanently protect land along the ULL boundary” and policy COS-P1.1 that would “support efforts by public agencies and nonprofit organizations to acquire and permanently protect open space areas containing important ecological or scenic resources and areas that connect protected lands to form a cohesive system of open space.” Plan infrastructure to avoid interfering with such acquisitions whenever possible.

However, the plan does allow for the destruction of these areas for “non-urban uses” such as “agriculture, mineral extraction, wind and solar energy production” (LU-P2.3). These uses still have a negative impact on native biodiversity and carbon sequestration and thus should be avoided if possible.

Alternatively, investments should be made in climate-resilient housing solutions that help communities adapt to these challenges while simultaneously helping to address the root causes of climate change. Such strategies include optimal orientation of buildings, green roofs and reflective surfaces to reduce temperatures in and around buildings; air-filtration systems that can protect residents from poor air quality; and rainwater harvesting and recharge systems that capture water on the roofs of buildings, which can store water during drought and reduce flood risk during heavy rains.^{xiv}

New and existing buildings should be equipped with the most efficient appliances to reduce energy and water needs. Residential and commercial buildings should also have rooftop solar and battery storage systems to provide clean and reliable energy, bringing greater resilience during climate change events that often shut down regional power grid services.^{xv}

As stated in the Center for Biological Diversity’s 2023 Rooftop-Solar Justice report, “The climate emergency demands a rapid and just transition to a fossil-free energy grid. This should include millions of rooftop and similar solar installations on homes, buildings and other available areas. As electric car and all-electric building growth maintain demand for electricity, distributed solar will be vital for a stronger and more affordable grid. It will reduce the need for utility infrastructure by bringing more pollution-free renewables online, while also improving resiliency and reliability and adding jobs and value to communities. These benefits are particularly relevant for environmental justice communities, which face both higher energy burdens and disproportionate harms from the fossil fuel economy.”

Investing in these measures will ensure communities are equipped with the necessary infrastructure to adapt to the changing climate. It is in our collective best interest to build sustainable, resilient homes that use the best available technologies to improve efficiency and provide people with the basic necessities of survival.

IV. The Plan Should Commit to Reducing, Re-using and Recycling Water

Policy COS-P7.9 “supports wastewater reclamation and reuse programs that maximize use of recycled water,” but that does not guarantee that they would be implemented. Requiring investment in these critical resiliency measures must be part of this plan.

Additionally, the Plan does not fully divest from destructive projects such as the Delta Tunnel. Policy COS-P9.3 states that the County should “oppose all efforts to construct an isolated conveyance (e.g., peripheral canal, tunnel) or any other water diversion system that reduces Delta water flows unless and until it can be conclusively demonstrated that such a system would protect, preserve, and enhance water quality and fisheries of the San Francisco Bay/Delta estuary system.”

The science is clear. The proposed Delta Tunnel conveyance project would irreparably harm the Delta ecosystem, leaving local communities with bad water quality and a collapsed fishery. Implying that the project could mitigate those harms to an “acceptable” level is a false solution and opens the door to further investment in this terrible project. The County should firmly oppose this project and instead invest in water resiliency measures such as recycling and groundwater recharge, as stated in policy COS-P7.6.

V. Land Use Policies that Promote Good Air Quality Should Be a Requirement in the Plan

Air quality is a significant environmental and public health concern in California. Unhealthy, polluted air contributes to and exacerbates many diseases and increases mortality rates. The U.S. government has estimated that between 10 to 12 percent of total health costs can be attributed to air pollution. (VCAPCD 2003.) Greenhouse gases, such as the air pollutant carbon dioxide, which is released by fossil fuel combustion, contribute directly to human-induced climate change (EPA 2016), and in a positive feedback loop, poor air quality that contributes to climate change will in turn worsen the impacts of climate change and attendant air pollution. (BAAQMD 2016.)

Air pollution and its impacts are felt most heavily by young children, the elderly, pregnant women and people with existing heart and lung disease. People living in poverty are also more susceptible to air pollution as they are less able to relocate to less polluted areas, and their homes and places of work are more likely to be located near sources of pollution, such as freeways or ports, as these areas are more affordable. (ALA 2022.) Some of the nation's most polluted counties are in Southern California, and San Bernadino County continually tops the list. (ALA 2022.) According to the American Lung Association's 2022 "State of the Air" report, San Bernadino County is the ninth-worst ranked county in the state for both ozone pollution and year-round particulate matter (PM2.5) pollution, with a "Fail" grade and an average number of 180 days per year with ozone levels in the unhealthy range. (Id.) Even more disturbing, the same report found that San Bernadino County is one of only fourteen counties in the country that received a "Fail" grade in all air quality metrics. (Id.)

Although there are many different types of air pollution, Ozone, PM2.5, and Toxic Air Contaminants (TACs) are of greatest concern. These three air pollutants have been linked to an increased incidence and risk of cancer, birth defects, low birth weights and premature death, in addition to a variety of cardiac and lung diseases such as asthma, COPD, stroke and heart attack. (Laurent 2016; ALA 2022.) Ozone (commonly referred to as smog) is created by the atmospheric mixing of chemicals released from fossil fuel combustion – such as reactive organic gases (ROG) and nitrogen oxides (NOx) – and sunlight. Although it is invisible, ozone poses one of the greatest health risks, prompting the EPA to strengthen its National Ambient Air Quality Standard for Ozone in 2015. (ALA 2022.) PM2.5 is a common component of vehicle exhaust emissions and contributes to visible air pollution. These tiny particles are dangerous because they are small enough to escape our body's natural defenses and enter the blood stream. Fugitive dust is a term used for fine particulate matter that results from disturbance by human activity such as construction and road-building operations. (VCAPCD 2003.) TACs are released from vehicle fuels, especially diesel, which accounts for 70% of the cancer risk from TACs. (CARB 2022a.)

Warehouse projects are well-documented sources of air quality degradation that can create serious, negative health outcomes for surrounding communities. (Betancourt 2012, pp. 4-5.) Particulate emissions from diesel vehicles that carry freight to and from warehouses contribute to "cardiovascular problems, cancer, asthma, decreased lung function and capacity, reproductive health problems, and premature death." (Id. at 5.)

While the Plan includes policy HS-A1.3 which states that the County should "include an Industrial-Sensitive Receptor Interface Overlay Zone ... and require industrial uses to reduce pollution and employ strategies to mitigate air quality, noise, vibration, odor, light, visual, and safety impacts on nearby sensitive receptors" this is not enough.

Proximity to pollution is the biggest factor influencing public health and therefore buffer zones are the most effective measure to protect residents from pollution sources. Per the California Air Resources Board's (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors is considered best practice.

Without such protections, projects continue to be built near schools, homes, healthcare facilities and other sensitive receptors. A 1,000 foot buffer zone when siting warehouses over

100,000 square feet next to schools, homes, healthcare facilities, and other sensitive receptors would decrease the rates of asthma, heart disease, cancer and other public health issues. Even the California Attorney General has recommended 1,000 feet as a buffer zone because it reduces exposure to diesel particulate matter by 80%.

We support policy HS-P1.6 that requires that any mitigation of air quality impacts occur onsite to the extent feasible to provide the greatest benefit to local residents, but the County can and should do more to prevent these pollution sources from being built near communities. Residents should have the right to clean air and this Plan has an opportunity to prioritize that right for current and future generations.

VI. The Plan Must Implement Affordable Housing Policies to Ensure that the Region Provides Equitable Housing Opportunities for All Residents

It is also important to prioritize housing affordability in all future land-use decisions. Building more market-rate housing alone will not solve our housing crisis. We need greater public investment to ensure that every new development will provide opportunities for those with low incomes.

This is especially important in high-income neighborhoods that often provide some of the best public resources but have historically remained exclusionary because of redlining and other discriminatory land-use decisions. Policy LU-P7.2 addresses by stating that “housing opportunities should be provided for all economic segments of the population, ensuring that affordable housing is distributed throughout the county and is not concentrated in traditionally lower-income areas.” It also would “promote development of affordable housing near public transit and essential services whenever possible.”

This is a great start, but it is going to take a much greater commitment to ensure community members have access to truly affordable and climate resilient housing. Below are 5 policy recommendations that would significantly increase the amount of affordable housing in the County:

1. Permanently protect all current affordable housing.

Many affordable units are only mandated to remain affordable for a set amount of time. This means they are susceptible to being converted to market-rate units after their term limits expire. Preserving existing affordable housing, including ensuring they meet high quality and safety standards as they age, is an essential part of solving the affordable housing crisis. This requires investment from government agencies to permanently protect current affordable units and enact policies to ensure that all new affordable units do not have term limits.

Unless we protect current affordable housing, future investments will not be additive but will merely replace affordable units lost to the housing market. This is an essential first step to provide security for those who rely on affordable housing, giving them the confidence that they will not be pushed out of their communities because of a sudden rise in rent.

2. Solidify legally binding anti-displacement policies.

While there is an abundant need to produce more affordable housing, changes in land-use policy have the potential to harm existing communities. It is imperative that the first course of action is to legally protect current residents. This ensures that future public investment will serve existing community members, while creating opportunity for others to access these resources.

When rental units are taken off the market for redevelopment, policies should be in place that require property owners to provide tenant compensation before the change. Tenants should be given a “right of return” at the same rent as before, and rental assistance during redevelopment in the same neighborhood. Tenants should also have the option to negotiate a fair, voluntary buyout agreement in lieu of a right to return.

3. Regulate Short Term Rentals

A landmark study led by Kyle Barron of the National Bureau of Economic Research found that Airbnb was responsible for nearly one-fifth of all the [residential rent increases](#) in the United States between 2012 and 2016.

The County should be collecting fines from short-term rental hosts who are breaking the law and the County should hold short-term rental companies — Airbnb, but also the many smaller players in the market — financially responsible for illegal activities occurring on their platforms. The [government of Quebec](#) has introduced fines of up to [\\$100,000 per listing](#) that does not have a valid license number. These numbers are tantamount to saying to Airbnb and the other platforms “follow the rules or leave town.” Contra Costa County should take the same approach.

Finally, the County should eliminate home-sharing licenses. These licenses allow hosts to offer short-term rentals year-round, and they enrich a small number of commercial operators at the cost of residents paying more for their own housing.

4. Upzone urban infill areas and require at least 20% of all new units be affordable in perpetuity

Affordable housing is only equitable if low-income residents are provided housing opportunities with access to public resources. This requires cities and counties to reform current zoning laws that have reinforced the redlining of low-income communities of color.

Changing existing single-family zoning to denser zoning that includes duplexes or multifamily units would encourage higher density in existing communities. For instance, in Los Angeles around 74% of housing is zoned single-family residential, and rents are among the highest in the nation.ⁱ

Shifting to more compact housing types significantly reduces residential land consumption. A mix of 80% single-family, 10% attached and 10% multifamily housing requires about twice as much land as an equal mix of housing types, and more than three times as much land as 10% single-family, 40% attached and 50% multifamily housing.⁴⁵ It’s important to note

that many existing single-family lots are very large (e.g., 8,000+ square feet) and could accommodate duplexes or be split into two separate smaller lots large enough for single-family houses and separate yards.

However, upzoning alone is not enough. We need to increase equitable affordable housing in communities that have remained exclusionary. This could be achieved by enacting a statewide inclusionary housing mandate of 15% at 50% of average median income or 20% at 60% of average median income for all new development of five units or more.

5. Eliminate in-lieu fees to ensure those units are built Onsite.

Finally, in-lieu fees, or fees that a developer pays into a fund to be spent on affordable housing elsewhere, should be eliminated, ensuring that all new developments with affordable housing requirements will be built onsite. In-lieu fees allow developers to pay their way out of affordable housing requirements leading to highly segregated neighborhoods and displacement of low-income residents to off-site affordable units. To ensure that low-income residents are provided affordable options in neighborhoods with the high public investment, we need to eliminate this option for developers.

VII. Conclusion

We strongly urge the County to adopt our recommendations and include strong policy language that protects native species, promote habitat connectivity, reduces greenhouse gas emissions and ensures affordable housing and public transportation to all community members.

Thank you for the opportunity to submit comments. We look forward to working with the Board to foster land use policy and growth patterns that promote wildlife movement and habitat connectivity and facilitate public health and safety. Please do not hesitate to contact the Center with any questions at the email addresses listed below.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth Reid-Wainscoat', with a stylized flourish at the end.

Elizabeth Reid-Wainscoat
Urban Wildlands Campaigner
Center for Biological Diversity
ereidwainscoat@biologicaldiversity.org

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To: Jody London <Jody.London@dcd.cccounty.us>

Cc: Demian Hardman <Demian.Hardman@dcd.cccounty.us>

Subject: I sent my comments b4 the deadline but here are a few typos corrected - I was wondering if this might constitute my comments Re: CAP deadline.

I sent my comments **b4 the deadline** but here are a few **typos** corrected - **I was wondering if this might constitute my comments, if possible.** Re: CAP deadline. Thanks for the consideration. Best.

Charles Davidson. Dx V Dust. Comm. Member

(510) 837-8441

On Apr 8, 2024, at 5:08 PM, Jody London <Jody.London@dcd.cccounty.us> wrote:

Charles,

I just emailed you an announcement that the comment period on the CAP and General Plan has been extended to April 22.

Jody London
Sustainability Coordinator
Contra Costa County
(925) 655-2815 (office)
(925) 434-3250 (mobile)
www.contracosta.ca.gov/6780/Sustainability

-----Original Message-----

From: Charles Davidson <charlesdavidson@me.com>

Sent: Monday, April 8, 2024 4:35 PM

To: Demian Hardman <Demian.Hardman@dcd.cccounty.us>

Cc: Jody London <Jody.London@dcd.cccounty.us>

Subject: CAP deadline.

Hi. I will send in my comments tonight. After 5 pm if that is OK. Thanks.
Sent from my iPhone

Subject: In-Depth Evaluation and Recommendations on the Contra Costa County Climate Action Plan. To: The Board of Supervisors, Staff and Members of the Sustainability Commission. Contra Costa County, Hercules. District V. From: Charles Davidson charlesdavidson@me.com (22 April 2024)

Charles Davidson
Member, Sustainability Commission
Contra Costa County. April 22, 2024

To: The Board of Supervisors and Members of the Sustainability Commission
Contra Costa County

Subject: In-Depth Evaluation and Recommendations on the Contra Costa County Climate Action Plan

Dear Members of the Board of Supervisors and Sustainability Commission,

As a dedicated member of the Sustainability Commission, I am compelled to present a detailed critique of the Contra Costa County Climate Action Plan as outlined in the Public Review Draft – October 2023. My analysis is driven by a commitment to ensure that our strategies not only align with scientific best practices but also safeguard public funds from being expended on unproven at scale or potentially hazardous technologies. My critique references industrial carbon-management policies that are close to being documented endorsements by the County without a complete in-depth discussion of the legal, public health and safety implications of these technologies when deployed at scale within Environmental Justice communities. By having industrial policy so deeply buried within the draft Climate Action Plan (that is a major component of the Envision 2045 County General Plan), it will make the Sustainability Commission complicit in advocating for policies that will certainly be involved in legal controversies. This letter will elucidate specific issues regarding hazards, financial costs, and biases within the proposed CAP and suggest a redirection towards more reliable and cost-effective environmental strategies.

For the following reasons outlined in this letter, I cannot support Contra Costa County’s Draft Climate Action Plan because of the industrial carbon management policies being advocated — both explicitly and implicitly — have long-term implications and profound regulatory gaps that are counter to both environmental stewardship or environmental justice.

1. Critical Examination of Endorsed Technologies

One merely begins with Contra Costa County’s Draft Climate Action Plan (p.16) that recommends that the County adopt policies to facilitate the County’s 2023 Healthy Lands, Healthy People study as Strategic Action NL-4 to pursue the implementation of recommendations from the carbon sequestration feasibility study, Healthy Lands, Healthy People to facilitate:

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“GHG emissions reduction strategies...[and] carbon neutrality...by expanding actions to capture and store carbon, including through natural and working lands and *mechanical technologies*, while drastically reducing anthropogenic sources of carbon pollution at the same time.

Mechanical carbon sequestration is embedded within the broad CAP endorsements intertwined with its endorsement of the "Healthy Lands, Healthy People: A Carbon Sequestration Feasibility Study" (completed in 2023) by advocacy for CCS and promoting the county’s non-required implementation of CCS per California law SB905, that states that a:

“Carbon dioxide capture, removal, or sequestration project” means a carbon dioxide capture project, a carbon dioxide removal project, or a sequestration project that seeks to provide for the long-term isolation of the carbon dioxide from the atmosphere through storage in a geologic formation.” And that

“CCS technology...means carbon capture, utilization, and storage technology or equipment used for capturing and sequestering carbon dioxide emissions from industrial, commercial, or energy-related facilities or sources”.

Geological-Industrial CCS Concerns: The Climate Action Plan references geological CCS as a viable strategy for long-term carbon sequestration. However, this technology, as proposed, is fraught with challenges, notably CO2 pipeline safety. There exists the not disproven potential for significant CO2 leakage, both in the catastrophic short-term sense and regarding the long-term viability of geological CO2 storage. To begin with, water in carbon steel pipelines can lead to corrosive carbonic acid from dissolved CO2 and hydro-sulfuric acid from dissolved hydrogen sulfide (H2S), accelerating corrosion and compromising pipeline integrity, necessitating expensive steel alloys. Planned in our area, the 12-mile pipeline from Pittsburg-to-Montezuma local CCS project's Phase Two aims to capture CO2 from multiple refineries’ fuel gas, potentially introducing H2S corrosion somewhere within the additional 50 miles of additional steel pipelines. Supercritical CO2 (SC CO2) exhibits unique gas and liquid properties beyond its critical point. Sudden pressure drops or temperature changes can trigger phase changes, causing rapid density and volume shifts, leading to a propagating shock wave and an "unzipping" effect that worsens initial damage.

CCS technologies face hurdles due to natural gas's dominance and the lower CO2 concentration in California’s Natural Gas Combined Cycle (NGCC) flue gas (from the three Contra Costa County electrical power plants), that would be in Phase One of the Montezuma CCS project. Despite being more efficient than coal-fired plants, CCS can drop a NGCC plant's efficiency from 60% to 48%, requiring operators to increase output by 25% to maintain previous demand levels.

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A comprehensive approach to sequester or otherwise reduce carbon input into the atmosphere is needed, focusing on sustainable non-thermodynamic alternatives to outdated fossil fuel technologies. Reforestation and most recently, cost-efficient hybrid solar-plus-battery renewable energy storage systems offer efficient, large-scale eco-friendly real solutions for carbon emission reduction and a transition from fossil fuels. Notably, the Pipeline Safety Trust highlights significant risks from a major CO2 pipeline expansion, citing regulatory gaps in siting, fracture mitigation, the cost of corrosion-resistant alloys, potential impact areas, odorant use, emergency response, contaminant presence, and regulating CO2 pipelines in various phases.

The County's 2023 Healthy Lands, Healthy People study as Strategic Action NL-4 in the Climate Action Plan recommendation not only prominently advocates for large-scale implementation of industrial geological CCS technology, but more subtly, advocates for the development of a massively expanded hydrogen economy. The on-the-ground reality of two current mixed municipal waste-to-hydrogen anaerobic pyrolysis industrial-scale "hydrogen hubs" projects in Contra Costa County is that they will be located in very close proximity to mostly underrepresented disadvantaged communities, with a legacy of marked negative health disparities by a number of metrics.

How does the CAP connect to mixed municipal waste incineration through Strategic Action NL-4, in a manner that entirely neglects to mention the proximal industrial risk and urban environmental justice implications of this adaptation, such as its already documented intention to incinerate plastic waste as a portion of its feedstock. It is not that biochar is a bad product, in and of itself, to create a biochar product for agricultural soils as a soil amendment. However, its feedstock or manufacturing siting location might be highly inappropriate and also its overly stated importance of Healthy Lands, Healthy People towards pyrolytic biochar production, is naive, to say the least. Healthy Lands, Healthy People states:

"Biochar is the remaining residue after organic matter (trees, vegetation, food waste, etc.) undergoes heating or baking with limited oxygen in a process known as pyrolysis. Biochar application as a soil amendment ...in agricultural settings has gained interest for its potential to increase water holding capacity, soil fertility, and carbon sequestration. Biochar use is limited by its availability, as it is produced in very few locations, and many of the estimated GHG benefits are lost once the product is shipped over a certain distance. Still, with the exploration into new energy production technologies derived from biomass and the potential for biochar to be widely available, it is a management practice to further consider."

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Both of these technologies, CCS and mixed municipal waste-to-hydrogen pyrolysis, though seemingly innovative, operate at extreme thermodynamic (high-pressure) regimes, are experimental at the scales proposed and come with high economic costs and operational risks to nearby disadvantaged urban, communities. The specific mention of geological CCS and urban-cited waste-to-hydrogen pyrolytic incineration (*already approved for allowing plastics pyrolysis*), as sustainable practices warrant a rigorous review due to their nascent stages of development and significant potential for financial and energy inefficiencies or social injustices of uncritically deploying this (not really innovative) technology.

Hydrogen Economy Risks: Similarly, the expansion of a hydrogen-based economy as described using pyrolysis to create biochar for agricultural soil amendment involves substantial risks related to hydrogen leakage, which could lead to explosions. The technological immaturity of controlling such emissions effectively and the absence of robust safety protocols in urban settings are not adequately addressed in the draft.

The proximity of the proposed facility to residential areas amplifies the potential health risks associated with its operation. The emissions from the pyrolysis process, including reactive organic gases, nitrogen oxides, particulate matter (PM2.5), greenhouse gases and odors, pose significant concerns for respiratory health, cardiovascular systems, and overall well-being. The facility's expected operation—24/7, with 50-100 diesel truck trips per day—further exacerbates local air quality issues, contributing to the pollution burden already felt by the surrounding community. Another potential community concern is the acrid and rancid food-waste odors related to H-Cycle's handling of decomposing food wastes. Additionally, a potential safety-related community concern, besides direct plant-operational gaseous emissions, is H-Cycle's storage, pipelines and on-road trucking of compressed hydrogen at approximately 200-times atmospheric pressure with up to 40 hydrogen tanker trucks per day.

2. Discrepancies in Environmental and Health Impact Assessments: The Plan's endorsement of certain technologies seems to overlook substantial environmental justice and public health implications. The push towards both CCS and pyrolytic incineration, specifically, could disproportionately affect disadvantaged communities by exposing them to increased environmental hazards.

Take, for example the impact on local communities of the proposed pyrolytic project in Pittsburg, which includes including plastics incineration for hydrogen production. Note that these are the same residents who would also be the nearest neighbors to Phase One of the Pittsburg-to-Montezuma CCS project connecting to the east CC County electrical power plants.

The siting of the proposed H-Cycle municipal solid waste facility adjacent to communities designated as disadvantaged under SB 535—and frequently ranking above the 90th percentile on CalEnviroScreen 4.0 for both disease and toxic burden—raises profound ethical and

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environmental justice concerns. Introducing a waste-to-hydrogen manufacturing facility in such an area, with large-scale incineration and intense compression of flammable gases, but without a fully transparent and more deeply engaging public review process, overlooks the cumulative pollution burden borne by the community and disregards the potential for further exacerbating health disparities. The "we will (better) regulate it later" is a false canard.

CalEnviroScreen 4.0 assessment (developed by the California Office of Environmental Health Hazard Assessment (OEHHA) and the California Environmental Protection Agency (CalEPA)), is a tool designed to identify California communities that are most affected by various environmental burdens.

CalEnviroScreen 4.0 highlights that for nine-tenths (9/10) of the 25,785 persons within the five census tracts (located less than one mile from the H-Cycle facility) the percentile ranking score for asthma is either 98% or 99%. H-Cycles projected siting in Rodeo, another disadvantaged community that has a similar stark public health and asthma percentile ranking would be located as close as one football field away from a 1,100-home neighborhood with the center of the waste-to-hydrogen facility located only two football fields away from the neighborhoods fence line.

• **Impact on Local Communities:** The proposed pyrolytic project in Pittsburg, which involves incinerating plastic for hydrogen production, is a prime example. This process, located near residential areas, could emit harmful pollutants, yet the Plan lacks a transparent assessment of these risks. Furthermore, historical precedents in the county have shown that General Plan-approved industrial activities such as oil and gas drilling near communities like those around Kaiser Antioch Hospital and local schools have led to detrimental health impacts.

Unintended Consequences: The Climate Action Plan and the linkage to previous climate-related documents.

Past County General Plans: Looking back to the 1990s General Plan, oil and gas drilling was to be allowed on agricultural land, in order to preserve the (economic) viability of that land. Fast forward to today, we have existing oil well one half-mile from Antioch Kaiser Hospital and a high school, on unincorporated county land, directly abutting what was a planned, now cancelled, senior housing development (in the City of Antioch, proper).

Making matters worse, a nearby oil-field wastewater well is currently being proposed and is in the application process by the same well operator, who constructed the oil well without a county permit. The proposed oilfield wastewater disposal would be through a currently capped and

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abandoned 60-year-old dry gas well that goes directly through a drinking water aquifer (used by the City of Antioch within the East CC County Municipal District).

Whether innocently, naively or disingenuously, previous boards of supervisors merely recapitulated older environmentally-related decrees from past county general plans going back to the 1960's, such as in their 2005-2020 General Plan (Existing General Plan with the 2023-2031 Housing Element); OIL AND GAS RESOURCES POLICIES 8-69, that states:

“The production of gas and oil resources shall be encouraged as a way to support the agricultural viability of rural areas.”

<https://www.contracosta.ca.gov/DocumentCenter/View/30918/Ch8-Conservation-Element?bidId=>

3. Overreliance on Federal Subsidies and Insufficient Local Integration: The Climate Action Plan, without articulating such, is entirely reliant on expected potential federal funding, such as the 45Q and 45V credits from the Inflation Reduction Act for CCS and waste-to-hydrogen (for non-green energy hubs that have already been approved to incinerate plastics), respectively.

This advocacy is still without a clear strategy to ensure these funds benefit local communities, when the most direct manner is to enhance local cost-effective and safe electrification, like solar and battery storage that would also benefit grid resiliency. Contra Costa County has more industrial brownfields than the rest of the Bay Area combined, 60-square miles worth, that would be ideal candidate sites for the facile implementation of grid-connected solar-plus-battery installations. An approach of ignoring unprecedented electrification opportunities, such as with using IRA funding, seems misaligned with the urgent need for local energy resilience and sustainability, in addition to not taking the opportunity to benefit communities long disabused by a legacy of polluting industries. To note that neither Contra Costa County nor MCE have any existing IRA applications, as opposed to subsidized CCS and pyrolysis incineration projects.

• **Need for Local Energy Strategies:** There is a notable absence in the Plan of a committed strategy to integrate and expand local renewable energy projects, which are vital for reducing dependency on unsustainable practices. The lack of investment in local solar and battery storage initiatives undermines the goal of community-centered sustainability and environmental justice.

4. Suggestions for Strategic Redirection In light of these concerns, I urge a thorough reevaluation of the current strategic direction of the Climate Action Plan. It is crucial that we

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shift our focus towards integrating scientifically validated, cost-effective, and environmentally sound practices.

- **Promoting Proven Low-Carbon Solutions:** Instead of allocating substantial public resources towards unproven technologies, the county should enhance its investment in proven solutions such as solar energy, wind power, and energy efficiency upgrades. These are not only more cost-effective but also provide clearer benefits in terms of carbon reduction and energy resilience.
- **Enhancing Public and Environmental Health Protections:** We must prioritize strategies that protect public health and ensure environmental justice. This includes implementing stricter emissions controls, improving community right-to-know policies, and ensuring that environmental impact assessments are thorough and transparent.

It is my conclusion that while the Climate Action Plan aims to position Contra Costa County as a leader in climate action, it is imperative that our strategies are grounded in scientific validity, cost-effectiveness, genuine sustainability and environmental justice. I look forward to working collaboratively with the Board and the Commission to refine our approach and ensure that our environmental policies effectively safeguard our community and natural resources. Thank you for considering this critical perspective. I am eager to engage further in constructive dialogue and to assist in the development of a revised, more sustainable strategic framework for our county's environmental policies.

Sincerely,

Charles Davidson. Hercules CA
Member, Sustainability Commission
Contra Costa County