

ATTACHMENT J

PUBLIC COMMENTS

J-1 350 CONTRA COSTA ACTION/SUNFLOWER ALLIANCE

J-2 RODEO CITIZENS ASSOCIATION

J-3 SAVE MOUNT DIABLO

ATTACHMENT J-1

PUBLIC COMMENTS FROM 350 CONTRA COSTA ACTION/SUNFLOWER ALLIANCE



September 16, 2024

To: Contra Costa County Supervisors John Gioia, Candace Andersen, Diane Burgis, Ken Carlson, and Federal Glover; John Kopchik, Director, Contra Costa County Department of Conservation and Development; Will Nelson, Principal Planner

Re: Continuation of Comments on Item D.3, 9/10/24 Meeting of the Board of Supervisors, Direction for Preparation of the Final Drafts of the General Plan

Dear Members of the Board and Planning Staff:

I'd like to thank you all for your responsiveness to the issues I raised on behalf of the Sunflower Alliance and 350 Contra Costa at the September 10 meeting of the County Board of Supervisors. This letter will document that exchange and introduce just a few additional comments on the Staff-recommended changes to the Draft General Plan described in the [August 21 Memorandum](#).

First, I'll begin with the recommendation presented at the meeting, and which led to Board direction to Staff after much robust discussion. In Health and Safety Element, New Policy HS-P1.7 (p.88), it's proposed that modernization projects of existing industrial facilities—many of which are on our shoreline—should plan for subsequent remediation only to industrial or commercial standards. We suggested a higher level of remediation that restores the site to a condition suitable for *any* proposed reuse, and which could include residential development or habitat restoration. We are concerned that potential and actual contamination release impacts shore areas as well as surface water bodies, and argued that a higher standard of remediation is required given the broad area of impact.

Happily, you agreed to site-by-site consideration of higher remediation standards, "where feasible, on a case-by-case basis."

We hope you will also consider adding a stipulation to New Policy HS-P1.7 (p.88) regarding modernization of existing industrial facilities, so that the required "significant reduction of criteria pollutants, toxic air contaminants and GHGs" will be achieved via use of Best Available Retrofit Control Technology. This requirement, along with the replacement of obsolete equipment, will go far in ensuring that modernization projects actually live up to their name,

and that our refineries operate as cleanly and safely as possible for the duration of time before their eventual decommissioning.

In Stronger Communities, SC-A8.2 Page 3-25/Business Innovation (p.18), we'd like to suggest a revision of the following phrase, highlighted in italics. The current version indicates that "demand for refined products remains significant and will persist *until replacement technologies exist for current uses.*" This statement is not quite accurate. These technologies do already exist, but not yet at the scale that is needed. We would suggest instead "demand for refined products remains significant and will persist until alternative technologies are deployed at the requisite scale."

Finally, in Page 7-41/Energy Resources (p.80), there is a brief recitation on Contra Costa County's long relationship with fossil fuel production. It is historically accurate, and we are not suggesting its elimination. However, what follows that is a lengthy paean to biofuel production. State policy acknowledges, and scientific consensus confirms, that biofuels are indeed "cleaner burning" when tailpipe emissions are considered. However, the statements about associated improvements in air quality and GHG reduction are inaccurate when refining is taken into account.

Public health and climate harms are caused by the refining of *any* liquid transportation fuel, whether plant or petroleum-based. (This [study](#), for example, finds that "respiratory ER visit rates among residents living within 10 km (approximately six miles) of biorefineries were significantly higher" than outside the 10 km zone, and that refining corn and soy-derived feedstock was the most negatively impactful.) Additionally, predominant biofuel feedstocks like soy and canola are well-known to cause deforestation and significant stress on the global food supply. If anything, the present controversy around biofuels is likely to increase. For all of these reasons, we suggest striking this entire section and concluding with a factual statement like: "Consistent with current state policy, two former petroleum refineries in the county have converted their operations from refining crude oil to processing biofuels."

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, [including increased support for a 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. Embracing the future, two former petroleum refineries in the county have already begun converting their operations from refining crude oil to processing cleaner biofuels.~~

Again, we'd like to extend out thanks for the opportunities you have provided to input on the Draft General Plan, and convey our deep appreciation for Staff's hard work over the last five years. You've produced a blueprint for this County that aims to advance environmental protection, promote economic vitality, support a clean energy transition, ensure environmental justice, and empower our historically disadvantaged communities, especially those adjacent to significant industrial operations. We think you've largely succeeded in balancing all of these objectives, which is definitely no easy task.

Sincerely yours,

Shoshana Wechsler
Sunflower Alliance

Lisa Jackson
350 Contra Costa

ATTACHMENT J-2

PUBLIC COMMENTS FROM RODEO CITIZENS ASSOCIATION

October 8, 2024

To: Contra Costa County Board of Supervisors and County Planning Staff

Re: Reconsideration of the Priority Production Area Designation for the Phillips 66 Former Carbon Plant Site

Dear Members of the Board and Staff,

We, the undersigned residents of unincorporated Rodeo and Crockett, and the city of Hercules, are writing to express our concerns about the proposed designation of the former P66 Carbon Plant site in Franklin Canyon as a Priority Production Area (PPA), as indicated within the Stronger Communities Element, Item SC-A9.3, of the revised Draft General Plan.

Given that site's close proximity—a mere 300 yards—from the Viewpointe neighborhood in Rodeo, we are particularly concerned about any potential reintroduction of hazardous or noxious heavy industrial activity there. The community has already been significantly impacted by operations at the Carbon Plant that caused a host of environmental issues during its decades of petroleum coke calcining, including high levels of SO₂ emissions and chronic soot problems.

When the Rodeo Renewed project was first announced four years ago, our community was extremely pleased to learn that the “Carbon plant would be closed, decommissioned, followed by demolition and land restoration” (from slide 5 of the Phillips 66 Project Outreach Presentation Power Point shared with members of our community). An August 12, 2020 memo from P66 further assured us that “[i]n addition to this project having significant environmental benefits, it will also increase the land for open space and conservation as we phase out the use of our Carbon Plant.” (A screenshot of this email, provided in response to a PRA, is attached in full, at the end of this letter.)

The explicit commitment by P66 to transition the site to non-industrial use and restore it as open space was a very strong selling point for this community, and it helped to encourage widespread support for Rodeo Renewed. Imagine, then, our shock and dismay to discover that there are, apparently, plans underway to reindustrialize the Franklin Canyon site, as codified in the revised Draft County General Plan.

Neither P66 nor the County has directly reached out to advise us of this new intention or obtain our informed consent in this matter. Going forward, we ask to be fully apprised of any projects that could be intended for this site, and which might have inspired the proposed PPA designation.

Our specific concerns about potential future uses of this site include but are not limited to:

- The risks posed by highly flammable processes or those involving extremely high pressures,
- Operations like municipal solid waste processing that might emit volatile organic

compounds (VOCs), perfluoroalkyl substances (PFASs), other endocrine disruptors, or dioxins (such as if utilizing plastics or construction materials),

- The processing of large quantities of odorous materials, and
- Continuing emissions of heavy metal-laden particulate matter, which pose a direct threat to public health.

These impacts would be obviously incompatible with the stated intent of the Draft General Plan to promote "health and quality of life" in Impacted Communities such as our own, per Stronger Communities Element SC-A1.3 (e).

In this section we have also discovered, much to our surprise, that you intend (via amendment of County Ordinance Cod Title 8 -Zoning) to categorize the area we reside in as an Overlay Zone. Projects within this zone will have to meet additional discretionary permit findings "that promote environmental justice, health, safety, and economic prosperity, including benefits that support community objectives and positively impact the health and quality of life within the community."

There does not seem to be any provision for excluding any projects at all, whether heavy or light industrial, an alternative which could conceivably provide this community with the greatest benefit for our health and quality of life.

Indeed, we are deeply concerned about continuing health impacts, as we have previously mentioned, and the economic stagnation that has blighted Rodeo for far too long, including the negative impact of long-term hazardous industrial activity on our housing values. In the best of all possible worlds, this activity would finally be brought to a complete and final end. But it seems there might be other, unspecified plans being made for us—and all in the name of environmental justice and economic prosperity.

For these reasons, we are requesting that you make completely public and transparent all the factors that have contributed to a covert reversal of previous plans for the site. We also urge you to reconsider the PPA designation.

Thank you for considering our position on this critical issue. We look forward to discussing with you how together we might arrive at a decision that reflects the community's best interests and well-being.

Sincerely yours,

Janet Callaghan, President, Rodeo Citizens Association (RCA)

Maureen Brennan, RCA Board member

Daphney Saviotti-Orozco, RCA Board member

Elizabeth Genai, RCA Board member

Elaine Wanderer, RCA Board member

Charles Davidson, RCA Board member

Bob Houseman, RCA Board member

Dan Romero, Mayor, City of Hercules
Donna Hoffmann, Rodeo
Aminah Elster, Rodeo
Pamela Heuser, Rodeo
Gregory Dennis Hensley, Rodeo
Christine Coody, Rodeo
Mike Coody, Rodeo
Kathy Casares, Rodeo
Bonnie Pannell, Crockett
Tara Shaia, Rodeo
Donna G. Pfister, Rodeo
Jack L. Pfister, Rodeo
Katherine Sherwood, Rodeo
Steven Craig, Rodeo
Janet Pygeorge, Rodeo
Katie Moran, Viewpoint-Rodeo
Patricia O'Neil, Rodeo
Robert Baum, Hercules
Peggy Storrs, Viewpoint-Rodeo
Joanne Houseman, Rodeo
David Rogers, Rodeo
Paul Stickel, Rodeo
Marianne Stickel, Rodeo
Carol L. Sheridan, Rodeo
Jeff Miller, Rodeo
Robert Houseman, Rodeo
Jonay Brownlee, Rodeo
Dan Thomas, Crockett
Catherine T. De Martini, Rodeo
Pamela Meigs, Fairfax/Rodeo
Victoria Bradley, Rodeo
James Bradley, Rodeo
N Kenine Voyles, Crockett
Lisa Argento Martell, Crockett
Natalie Lopez, Rodeo
Salvador Gracian, Rodeo
Nancy Rieser, Crockett
Elena Davidenko, Rodeo
Alifea Davis, Rodeo
Angela Davis, Rodeo
Azaria Davis, Rodeo
Ammon Davis, Rodeo
Margarita L. Emmanuel, Viewpointe, Rodeo
Brian Lewis, Viewpoint, Rodeo
Selina Williams, Hercules

Ruby Park, Rodeo
Casey Meigs, Rodeo
Erin Hallisy, Crockett
Vaughn Gunkelman, Crockett
Tammy Collins, Viewpointe, Rodeo
Timothy Collins, Viewpointe, Rodeo

Attachment

Gary Kupp

From: Henry, Aimee <Aimee.M.Henry@p66.com>
Sent: Wednesday, August 12, 2020 2:50 PM
To: Eastep, Brent P; dsgamiles.argos@gmail.com; Bill Concannon; Danielle Fugere; Frank Brosnan; Gary Kupp; Howard Adams; Mike Kirker; Maureen; Jay Gunkelman; Axel Abellard; Janet Callaghan; Francisco Avila; Brent Olive
Subject: Phillips 66 Announcement

Phillips 66 announced today plans to reconfigure our Rodeo Refinery into the largest renewable transportation fuels plant in the world, capable of producing more than 800 million gallons a year of renewable diesel, renewable gasoline and sustainable jet fuel.

Renewable diesel is a "drop-in" replacement fuel that is chemically identical to crude oil-derived diesel but with lower carbon intensity. Renewable gasoline and sustainable jet fuel are also considered "drop-in" replacements when blended to make low-carbon, low-sulfur, high performing fuels. Renewable diesel is a drop-in fuel with no engine conversion needed.

This is exciting news as it positions the Phillips 66 Rodeo Refinery to be the world's largest renewable fuels production facility and moves Rodeo refinery away from the processing of crude oil. If approved, by Contra Costa County officials and the Bay Area Quality Management District, renewable fuels production is expected to begin in early 2024.

The Rodeo Renewed project has significant environmental benefits that will improve air quality, reduce our carbon footprint and create green jobs. The conversion would significantly reduce local emissions by 60% and according to CARB, use of renewable diesel is 60-80% lower on GHG emissions than traditional fuels. In addition to this project having significant environmental benefits, it will also increase the land for open space and conservation as we phase out the use of our Carbon Plant.

This project allows for additional Green Energy opportunities as the facility will have the capability to produce sustainable jet fuel and renewable hydrogen. In addition, 15% of the plant will be powered by solar energy.

Allowing for a "just transition", the project supports 400 Green jobs and 500 construction jobs over the life of the project while using local union labor, including Contra Costa County Building & Construction Trades.

This refinery was built in 1896 and has a long history, and many of you, our community members have been a part of that very rich history. We value our relationship and wanted to share this announcement with you and share more information about the future of our Rodeo facility.

A presentation and overview of this project will be presented at a later date to the CWG.

Please click [here](#) to view the Press Release.

For more information on the Rodeo Renewed project, visit www.RodeoRenewed.com.

ATTACHMENT J-3

PUBLIC COMMENTS FROM SAVE MOUNT DIABLO

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Arthur Bonwell
Mary L. Bowerman

Proud Member of
Land Trust Alliance
California Council of Land Trusts
Together Bay Area



October 8th, 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 Climate Action and Adaptation Plan 2024 Update and 2045 General Plan

Dear Mr. Nelson,

Save Mount Diablo (SMD) is a nationally accredited land trust founded in 1971 with a mission to preserve Mount Diablo's peaks, surrounding foothills, watersheds, and its sustaining Diablo Range. We accomplish this through land conservation and management strategies designed to protect the mountain's natural beauty, biological diversity, and historic and agricultural heritage; enhance our area's quality of life; and provide educational and recreational opportunities consistent with protection of natural resources.

We acquire land, or interests in land, for conservation purposes and often for addition to parks on and around Mount Diablo. We are involved in land use planning, policy and advocacy which might affect protected lands. We build trails, restore habitat, and are conduct 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 would like to express our thanks to County staff and leadership for their work on the Contra Costa County Climate Action and Adaptation Plan (CAP) and the 2045 General Plan (GP). A great deal of community outreach and consultation with stakeholder groups was done to achieve the current drafts, and these efforts are appreciated.

The integration of the CAP and GP with each other will make decisions and actions that grow from these documents more beneficial and more effective for Contra Costa County residents in the coming years. In addition, explicitly incorporating the themes of economic development, community health, environmental justice and sustainability has contributed to the high-quality documents that have been prepared for Board consideration. We commend decision makers and staff for their leadership on these themes and look forward to seeing the Board commit significant resources in the future to implementing these ambitious planning documents.

Regards,

Juan Pablo Galván Martínez
Senior Land Use Manager