

12 April 2012

Mayor Gayle McLaughlin  
Members of the City Council  
City of Richmond  
450 Civic Center Plaza  
Richmond, CA 94804-1630



**Re: City Council consideration of the Richmond General Plan Update and Environmental Impact Report (City File PLN09-137)**

Dear Mayor McLaughlin and Council members,

Communities for a Better Environment (CBE) supports the General Plan Update as recommended by the Richmond Planning Commission. We especially urge the City Council to include the Planning Commission's recommended Policy EC1.1 and actions EC1.A and EC1.D in the General Plan. The Commission recommended this less-emission, more-jobs land use policy by a unanimous vote on November 3, 2011.

Putting this less-pollution, more-jobs land use policy into effect could reduce pollution, improve health, and create jobs for Richmond residents in disparately impacted low income communities of color. CBE participated actively with community members, business representatives, City Staff and the Planning Commission in the development of this policy. Evidence we have provided to the City in support of this policy is compiled for the record in this submission and summarized for your convenience below.

- *A less-pollution, more-jobs land use policy to make Richmond a Green Zone (2/2012)*

This two-page fact sheet summarizes how our community-based land use policy could bring cleaner industries, less pollution, and more jobs to Richmond and why that is so important in communities disparately impacted by pollution and blight.

- *Big Oil, little jobs: Green Energy, more jobs (12/2011)*

This two-page fact sheet provides more detailed data and scientific support for the jobs analysis summarized in our February 2012 fact sheet described above.

- *Expert Report of Greg Karras, Senior Scientist, Communities for a Better Environment (CBE) regarding: The Draft Environmental Impact Report for the Proposed General Plan Update (PLN09-137), City of Richmond, CA (3/18/11)*

This 16-page expert opinion was requested to address community concerns about the treatment of industrial emissions in the General Plan Update draft EIR. It details substantial evidence for three findings: (1) The draft EIR's description of the City's role in solving the climate problem is incomplete. (2) Industrial emissions could cause significant additional air quality and climate impacts that the draft EIR fails to identify, analyze, lessen or avoid. (3) The draft EIR's assertion that air quality and climate impacts are unavoidable is incorrect. Importantly,

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this analysis identifies feasible industrial emission reduction measures and shows that these measures could reduce city-wide emissions of pollutants that impact climate and community health.

- *Supplemental comments of Communities for a Better Environment (CBE), General Plan Update Draft Environmental Impact Report (PLN 09-137), Energy, Climate and Air Quality Review (3/31/11)*

This five-page comment letter supplements CBE's technical assessment in the expert report discussed above and includes policy analysis. It discusses how correcting deficiencies in the draft EIR could avoid both those significant emission impacts identified by the EIR and those identified by CBE while helping to meet the City's stated goals of reducing emissions and protecting environmental health.

- *Comments of Communities for a Better Environment (CBE) on the Energy and Climate Element of the Proposed General Plan Update (4/20/11)*

This 40-page document responded to a request by the Planning Commission at its 7 April, 2011 General Plan Study Session for CBE to submit ideas for specific language that could be included in the Plan to avoid increasing emissions and instead reduce emissions while creating jobs. Pages 17–19 of this document include the language initially suggested by CBE for Policy EC1.1 and actions EC1.A and EC1.D.

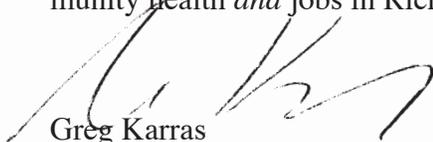
- *Richmond General Plan Update (PLN09-137) and Environmental Impact Report: Mitigation of air quality and climate impacts to comply with CEQA (10/14/11)*

This four-page letter to the Planning Commission was copied to City Council to remind the Commission and alert other City leaders about the problem and solution documented in CBE's previous comments. It summarizes our previous comments, excerpts suggested language from our 20 April 2011 comments, and includes a recent comment letter by the State Attorney General that was not previously available.

- *General Plan, Planning Commission Process (17 January Council Item I-3)*

The timeline documented in this letter shows that language substantially similar to Planning Commission-recommended Policy EC1.1 and actions EC1.A and EC1.D has been available and identified for inclusion in the General Plan since April 2011.

CBE believes that the City Council shares our goal of healthier, more prosperous communities with less pollution and more jobs in Richmond. The less-pollution, more-jobs land use policy that the Planning Commission voted unanimously to recommend (EC1.1, EC1.A and EC1.D) is critically important to achieving this goal. Please include this critically needed policy for community health *and* jobs in Richmond's General Plan.



Greg Karras  
Senior Scientist

Attachments: CBE documents described above (pdf file "AttCBE-Richmond 041212")