

What should i
designated pa
current pathw
appropriate?

Need course
correction - get to
permit denial for
overly impacted
communities &
identification of
more appropriate
sites for HWFs

be in a
e the
ations

anism - may not
analysis of
cumulative impacts
on
community-by-comm
unity basis. Statewide
comparison tool,
intended to direct
funding to most
burdened
ommunities - misses

SB 673 should
enable permit
denial when
appropriate

Should be
looking at SB
673 criteria
rather than
setting up
new pathways

Proposed
designations
are not
appropriate.

Modify permits to
reduce risk & harm
associated with a
facility: Consider
reducing volume of
waste, modernizing
equipment/ensuring
it is functioning

This process should
be beyond the
conceptual level.
673 should inform
permit decisions,
including denials
and modifications.
Disheartening to be
at this point.

Devil is in the details
- particularly
evaluating
cumulative impacts
vs. particular
impacts of a
particular facility

Appropriate to use
classification as the
first step in this
process. Facility types
vary greatly.
Appropriate to include
criteria (neighborhood
characteristics) & take
larger geographical
area

How should we use the pathway
designation approach to
appropriately inform the
permitting process?

Community
Perspective
(Hosts: Patrice
and Julia)

Importance of
compliance and
enforcement - e.g.,
tier 1 should be
more frequently
inspected

Two examples
where CES score
would have missed -
a mine in Mojave
desert, massive fires
along I-5 freeway.

Worried that a
lot of the
issues are not
permitted
facilities, but
generators.

CES does not
capture everything -
groundtruthing
process is critical.

Should
include
permit
denial

Update language to
reflect that
potential permit
denial is a part of
the process

Break connection
between pathway and
action plan steps -
instead, for facilities
where community has
significant impacts,
create a clear
threshold for denying
permits

What additional categories of
facility actions should be added
to improve the community's
quality of life?

If problem facilities
on enhanced
surveillance have
repeat violations,
should use permit
denial.

Requiring increased
monitoring for
facilities with any
violations in the
past 5 years

Not allowing
monitors to be
turned off
(enforcement)

What should it mean to be in a designated pathway? Are the current pathway designations appropriate?

How should we use the pathway designation approach to appropriately inform the permitting process?

What additional categories of facility actions should be added to improve the community's quality of life?

Industry perspective (Hosts: Orit, Diana, and Hin-Yun)

Concern - bog down the process and confusing. build off what existing statutes are providing for, built in triggers (during expansion/modification)

take few examples and demonstrate how you arrived at the designation? what is DTSC's process?

pathway approach makes DTSCs work much more difficult. early steps are creating community expectations regarding facilities threats and they may not be consistent with information/data

looking at specific indicators? complexity may not contribute to the outcome

How does the blackbox work? how would each perspective define the values?

Don't agree with the pathway approach - existing requirements and c/i elsewhere

path to denial or environmental improvement - pathway improvement (health and environment). Denial has other components to it

this is another layer of complexity

clarification - actions based on impacts - SB673 language is not clear on intent. facilitation and forms

Scrap the pathway approach

provide specific examples of the process to pathway designation?

move towards facility-specific assessment

focus on renewal

LAC process

increased cost of doing HW in California - what is the alternative?

determining impacts - requires analysis beyond the pathway parameters

putting together the work of the facilities in addressing HW and community interests is complex

are we building a process that is just about three facilities?

have the communities with highest levels of vulnerabilities identified? tackles those.

HW is going out of state - good policy? denial is not pathway to improvement

health risk assessment should be at the forefront

the total CES is not informative as to facility impacts

spotlight on these facilities

don't lose sight if we are needing to address specific facilities

need legal analysis/authority to do this work

pollution burden scores and indicators. more investigation is needed.

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Local/State Agencies
(Evelia and Gary)

Pathways in the framework do not inform permit decisions, but how could they be used by permitting to improve the process?

Include goals that benefit the community, such as jobs and summer internships.

May need to build in acknowledgement of local benefits of permits. Rerouting is possible, distant facilities or out of state facilities means more miles and greenhouse gases.

While denial is an option, mitigation can provide trade-offs, such as jobs and impacts.

Is there a way to determine a threshold for pollution burden, "the straw that breaks the camel's back?"

When assessing alternative, cumulative impacts must detail both the good and the bad outcomes.

Why can't mitigation measures just provide additional protections without being tied to facility operations? In Kettleman City, the landfill planted trees to protect residents from pesticide drift.

Should the impacts distinguish between level of impacts? Groundwater with VOCs may expose residents to indoor vapor intrusion, but not all contaminated groundwater presents the same level of potential impacts.

Reduce diesel impacts by requiring newer engines, improved diesel scrubbers.

Impacts from air quality have highest impacts, then water, then soil. How do we address not only the presence of pollution but also weigh the burden.

Proposal should have separate criteria for new facilities and for facility permit renewals.

