



December 6, 2024

Ms. Katie Butler
Director
California Department of Toxic Substances Control
1001 I Street
Sacramento, CA 95814

Subject: Urgent Request: Halt the Proposed Hazardous Waste Policy Change

Dear Ms Butler:

My name is Gerry Palon and I am the President and CEO of the Coalition of Filipino American Chambers of Commerce. Our organization represents 44 Filipino American Chambers of Commerce across the USA, dedicated to fostering economic development, workforce growth, and community outreach to uplift Filipino American entrepreneurs.

I write to you today with deep concern regarding the proposed policy change that would increase the amount of hazardous waste dumped on California's vulnerable communities. The implications of this decision are devastating and call into question the progress we've made in environmental justice and community health.

Firstly, the increased local burden cannot be overstated. By channeling more hazardous waste to just a few disposal sites, air and water quality in these regions will degrade. Traffic issues, already a significant concern, will only worsen, leading to increased emissions and road wear. The communities around the in-state landfills that will receive this material will bear an unsustainable environmental load, risking the well-being of countless families.

Moreover, this policy contravenes years of hard-fought progress in protecting disadvantaged areas. These vulnerable communities—many of which comprise minority populations—will be exposed to added environmental hazards that jeopardize their health and safety. This undermines the very essence of environmental justice, making a travesty of our state's commitment to fair treatment and meaningful involvement of all communities regarding environmental laws, regulations, and policies. By considering this policy, your agency is simply shifting the burden from the communities near the Kettleman Hills and Buttonwillow landfills to multiple communities throughout the state.



Economically, the proposed policy is a boondoggle. The costs associated with increased hazardous waste management will escalate, placing immense financial strain on businesses. This trickles down to impact local economies, delaying vital development projects and creating liabilities that California can ill afford in these challenging times.

The lack of public input and transparency surrounding this policy shift is equally troubling. A change of this magnitude demands robust community engagement and rigorous public discourse. The DTSC must solicit comprehensive feedback from the affected communities and stakeholders to understand the full spectrum of this policy's impact. The operating permits for facilities that may receive this material should be fully reviewed and subject to input from the local communities that may be impacted.

In view of these grave concerns, I urge you to reconsider the proposed policy change. Instead of consolidating hazardous waste in already overburdened areas, we should explore diversified management options, leveraging the capacity and compliance of out-of-state facilities that meet stringent federal standards. This approach not only alleviates local environmental stress but fosters a more equitable distribution of waste management responsibilities.

California prides itself on being a leader in environmental protection and social equity. Let us not tarnish that reputation by adopting policies that harm our most vulnerable populations and undermine the well-being of our communities.

Sincerely,

Gerry Palon
President & CEO
Coalition of Filipino American Chambers of Commerce
gerrypalon@cofacc.org

cc: Ryan Dominguez – California DTSC