

DRAFT
Racial Equity Memorandum for
Expansion of the Central Disposal Site
Petaluma, California
5/23/2023

Introduction and Project Description:

This memorandum lays out our strategic plan for a potential landfill expansion of the Central Disposal Site in Sonoma County, should the Board of Supervisors provide direction to move forward. It represents a living document that is expected to undergo numerous revisions as we move through the phases of project implementation and engage with the various stakeholders within the community.

Our primary purpose is to ensure a comprehensive approach that considers the broader community needs, environmental considerations, and racial equity throughout the project's lifespan. This document highlights our commitment to establishing a framework that promotes transparency, inclusivity, and accountability at every step of the process.

Proposed Project:

Sonoma County, in a potential collaboration with Republic Services, is considering expanding the existing landfill capacity to meet the growing demand for waste disposal services. The need for expansion is twofold: it serves an immediate necessity and also provides a strategic opportunity to enhance our local waste management system's efficiency, sustainability, and community responsiveness.

The proposed expansion involves increasing the landfill's capacity, adopting advanced waste management techniques, and bolstering the existing waste segregation practices. A primary goal is to increase our capacity to manage waste locally, which could mitigate the potential for dramatic cost increases in out-hauling and disposal for our residents.

The landfill is an essential component of our County's disaster response infrastructure. In the face of natural disasters, it has to accommodate not only regular waste but also the additional debris and waste generated by such events. Without sufficient capacity, this could lead to delayed response times, significantly impacting the community, particularly economically disadvantaged residents who usually bear the brunt of such crises.

The proposed landfill expansion also offers an opportunity to negotiate with Republic Services to leverage the economic model for additional community benefits. This could encompass improved waste management services, enhanced community outreach and education, and potential cost mitigations for our County's residents.

Although the landfill itself isn't situated in a disadvantaged area, its services affect the entire county, including disadvantaged communities. The planned expansion aims to provide equitable, efficient, and sustainable waste disposal services to all residents of Sonoma County.

Ultimately, this landfill expansion is about more than just increasing waste capacity; it's about improving the quality of life for our residents and making our County more resilient in the face of disasters and other challenges. It's an investment in our County's future and a commitment to serve all our communities effectively and equitably.

Evaluation of Data:

In evaluating the impact of the landfill expansion, we will utilize a comprehensive data tracking system and use an equity lens to ensure that the impacts and benefits are spread equitably across the County.

Our data tracking system will measure and monitor the impacts of the expansion project across various metrics including waste diversion, costs of waste disposal, response times during disasters, changes in waste management practices, and more. We will focus particularly on assessing how these changes affect disadvantaged communities in the County, including cost impacts and changes to service delivery.

Data tracking will not just be a one-time activity, but an ongoing process, which will continue throughout the life of the expansion project. We will routinely evaluate the data to identify any trends, challenges, or areas where we can improve.

As part of the expansion project, we will be undertaking an extensive California Environmental Quality Act (CEQA) process. The CEQA process will ensure a thorough evaluation of the project's potential environmental impacts, including air quality, noise, traffic, and other factors that may directly or indirectly affect communities, especially disadvantaged ones. We will apply an equity lens in this CEQA process, ensuring that the impacts on disadvantaged communities are thoroughly evaluated, and that mitigation measures are designed to ensure these communities are not disproportionately impacted.

Data from the CEQA process, combined with our ongoing data tracking, will provide a comprehensive picture of the impacts of the landfill expansion. This data will guide us in making decisions and adjustments to ensure that the benefits of the expansion are equitably distributed, and any potential negative impacts are minimized or mitigated. By integrating equity into our data tracking and CEQA processes, we are committing to not just expanding the landfill, but doing so in a way that promotes the well-being of all communities in Sonoma County.

Community Engagement:

Community engagement is a core element of our landfill expansion project. We acknowledge the potential impacts on communities across Sonoma County and emphasize the importance of open communication, addressing concerns, and involving as many stakeholders as possible in our decision-making process. We're committed to engaging in a manner that centers equity and inclusivity.

Our comprehensive community engagement plan includes the following:

1. **Outreach to Stakeholders:** We will reach out directly to local governments, neighborhood groups, environmental organizations, businesses, and other stakeholders. This will involve informational letters and emails, virtual presentations, and open meetings. The goal is to include all entities with a vested interest in the project, from residents and businesses near the landfill to environmental and climate-focused groups.
2. **Collaboration with Sonoma County Local Task Force (LTF):** The LTF, with its deep community ties, will assist in reaching out to community members about the landfill expansion project. We'll work closely with the LTF to ensure our messages are accurate, comprehensive, and responsive to community concerns.
3. **Community Meetings:** As part of the CEQA review process, we will host community meetings to provide a public forum for discussing the project. We'll make a particular effort to include disadvantaged communities that might be disproportionately affected. These meetings will be conducted in multiple languages, including Spanish, with additional translation services available as needed.
4. **Public Hearings:** Complying with the CEQA process, we will hold public hearings at key stages of the project. These hearings provide an opportunity for community members to voice their views, and for decision-makers to explain their considerations. All public hearings will be publicly noticed and will include time for public comments.
5. **Website and Social Media:** We will maintain a project website with detailed, up-to-date information about the landfill expansion. We will also use social media to share updates and respond to public queries.
6. **Direct Engagement:** We will establish a dedicated email address and phone hotline for the landfill expansion project. This enables community members to ask questions, voice concerns, and provide feedback at their convenience, ensuring their voices are heard and valued.
7. **Engagement with Climate-Focused Community Groups:** Understanding the intersection of waste management and environmental sustainability, we will engage with climate-focused groups. Their insights will guide our project implementation to minimize environmental impacts and contribute to broader climate goals.

This comprehensive community engagement plan is designed to ensure that all stakeholders feel heard, understood, and involved throughout the landfill expansion process. We are committed to maintaining open lines of communication and working together with the community to successfully implement this critical project.

Unintended Consequences of Policies and Mitigations to Promote Racial Equity:

While the landfill expansion project is designed to benefit all Sonoma County communities, it's essential to examine potential unintended consequences and develop appropriate mitigations. This examination is especially crucial when viewed through a racial equity lens, as we aim to ensure that disadvantaged communities are protected and empowered through this project.

1. **Decrease in waste disposal costs:** The landfill expansion aims to enhance waste management efficiency, and as a result, we expect a decrease in waste disposal costs. While this is an intended positive consequence, it's important to recognize that lower costs may not uniformly benefit all communities. Lower-income households, for example, spend a higher proportion of their income on essential services like waste disposal. A reduction in disposal fees could therefore disproportionately benefit these households, contributing to enhanced economic equity.
2. **Disproportionate impact in disaster response:** The landfill plays a crucial role in disaster debris management. During expansion works, there might be concerns about potential disruptions to this service, which could disproportionately affect disadvantaged communities in times of disaster.

We will mitigate any potential disruption by meticulously planning the expansion phases. This includes maintaining operational sections of the landfill throughout the project, coordinating closely with disaster response agencies, and developing contingency plans for debris management during emergencies.

3. **Potential environmental impacts:** While the landfill is not located within a disadvantaged area, the environmental impacts such as air quality, noise, and traffic could potentially affect nearby communities. As part of our commitment to racial equity, we need to ensure that these impacts do not disproportionately affect disadvantaged communities.

We will mitigate potential environmental impacts through a rigorous environmental impact assessment during the CEQA process. We will ensure that community concerns raised during public comment periods are addressed promptly and adequately, and appropriate mitigation measures are implemented.

4. **Resiliency funding:** As part of the potential partnership renegotiations with Republic Services, we will evaluate the feasibility of redefining contingent liability funding into a resilience fund. This fund could potentially be mobilized for debris removal and related activities during disaster periods. A component of this fund could be specifically earmarked to assist disadvantaged residents during these times, centered around solid waste disposal and handling. This assistance would aim to alleviate the disproportionate burden often placed on these communities during disaster situations.

However, it's important to note that while this option will be thoroughly explored, its viability is contingent on the legal interpretation of fund collection and utilization. Consequently, we cannot guarantee the establishment of this resilience fund at this stage. Our team will collaborate with legal advisors to ascertain whether this is a feasible and permissible approach under existing regulations and legal frameworks.

Our goal is to ensure that the landfill expansion project not only provides for the county's long-term waste management needs but also contributes to the broader goals of racial equity and resilience in Sonoma County. We believe these mitigation strategies will be instrumental in achieving this goal.

Implementation Plan:

Our implementation plan is multi-faceted, addressing the physical, operational, and community aspects of the landfill expansion project. We intend to ensure that every stage is carried out with due consideration for its potential impacts on disadvantaged communities and opportunities to promote racial equity.

1. **Physical Expansion:** The landfill expansion project will involve extensive construction and development. This will be managed by Republic Services, in accordance with the project design approved during the CEQA process. Throughout the construction phase, we'll monitor activities to ensure compliance with all environmental and safety regulations and minimize disruptions to landfill services and local communities.
2. **Operational Enhancements:** Alongside the physical expansion, we plan to enhance the operational capacity of the landfill. This includes integrating newer technologies to improve waste management, exploring renewable energy opportunities, and identifying ways to extend the landfill's life span.
3. **Monitoring Impacts:** We'll implement a rigorous tracking system to monitor the impacts of the landfill expansion on local communities, especially those that are economically disadvantaged. This involves assessing changes in waste disposal costs, tracking air and water quality in surrounding areas, and keeping a watchful eye on the project's environmental and social impacts.
4. **Community Benefits and Outreach:** Our commitment to promoting racial equity extends beyond mitigating potential impacts. We are exploring ways to deliver additional community benefits as part of this project. Our outreach efforts will focus on ensuring that all community members are well informed about the project and its benefits, can express their concerns, and feel a sense of ownership in the project.
5. **Partnerships:** We will work closely with our partners at Republic Services, Zero Waste Sonoma, and the Sonoma County Local Task Force, as well as with local governments, businesses, and community groups. These partnerships will play a crucial role in implementing the project, monitoring its impacts, addressing community concerns, and delivering benefits to the community.
6. **Ongoing Review and Adaptation:** As the landfill expansion project progresses, we'll review our implementation plan regularly to assess its effectiveness and make adjustments as needed. This includes addressing any emerging issues, responding to community feedback, and adapting our strategies to ensure they continue to promote racial equity and serve the best interests of all Sonoma County communities.

This comprehensive implementation plan is designed to ensure the landfill expansion project meets its objectives while minimizing negative impacts and maximizing benefits for all communities, particularly those that are disadvantaged.

Accountability, Communication, and Evaluation of Results:

Transparency, ongoing communication, and thorough evaluation are fundamental to the successful implementation of the landfill expansion project. We are committed to maintaining rigorous standards of accountability at every level of operation, from construction and waste management to community engagement and benefit distribution.

1. **Accountability:** Robust accountability mechanisms will be put in place to ensure the effective execution of all measures related to the landfill expansion. Republic Services, as the operator, will be held to strict performance standards and contractual obligations. The County will conduct regular site inspections, compliance checks, and audit reports to monitor project progress and ensure adherence to all relevant regulations and commitments. Any deviations will be addressed promptly, with corrective actions implemented as needed.
2. **Communication:** Ongoing communication with the public and stakeholders is a priority for us. We will provide regular updates about project progress, environmental monitoring results, and community benefits through various channels, including public meetings, mailings, our project website, and social media platforms. Special attention will be given to engaging with disadvantaged communities, ensuring that they are informed, heard, and considered throughout the project. Language accessibility will be ensured in all our communications, with materials available in both English and Spanish.
3. **Evaluation of Results:** The effectiveness of the landfill's operation and the distribution of benefits will be subject to continuous evaluation. We'll establish clear metrics and indicators to assess the project's success in terms of waste management, environmental impacts, community benefits, and racial equity promotion. We will also evaluate the financial aspects of the project, ensuring that waste disposal costs are fair, and any savings resulting from the landfill expansion are passed on to all residents, particularly those from disadvantaged communities.
4. **Annual Reporting:** We commit to producing comprehensive annual reports detailing project progress, operational efficiency, environmental impact, community engagement efforts, and the distribution of benefits. These reports will be shared with the County and will also be made publicly available. They will serve as a tool for demonstrating our commitment to transparency, evaluating our performance, and making any necessary adjustments.
5. **Addressing Grievances:** An essential component of our accountability is the fair and prompt handling of any grievances or complaints from the community or stakeholders. We will establish a clear, accessible grievance redress mechanism, ensuring that any issues are promptly addressed and resolved to the satisfaction of all involved parties.

This strategy for accountability, communication, and evaluation of results is designed to promote transparency, community involvement, and continuous improvement, with the ultimate aim of serving the best interests of all Sonoma County communities, particularly those that are disadvantaged.