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INSTITUTE FOR
RURAL STUDIES



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Robert Flores, Principal Planner
Riverside County Planning Department
4080 Lemon Street
Riverside, CA 92501

Submitted Via Email

RE: Riverside County Draft Safety Element

Dear Mr. Flores,

On behalf of Leadership Counsel for Justice and Accountability, California Institute for Rural Studies, Consejo de Federaciones Mexicanas, and in partnership with residents in the Eastern Coachella Valley (ECV), we ask that you consider the following comments in the updated Safety Element of Riverside County's General Plan.

Fires and Hazardous Waste Material

The Draft provides good policies to ensure effective management of fires and hazardous waste and other material. However, two interrelated components that must also be addressed through additional and intersectional policies are illegal dumping and burning. As identified in the AB 617 Community Emission Reduction Program, the community of the ECV listed illegal dumping and burning as one of the six top air quality concerns in the region. Current policies must also be improved to prohibit illegal dumping of hazardous waste nearby communities and other sensitive receptors regardless of land jurisdiction. To address these issues, we recommend adding the following policies:

- Develop and implement a protocol for collaborating with Native American and indigenous tribes that experience frequent fires, either natural or as a result of illegal burning. This includes developing working relationships and partnerships with Tribal governments and their fire departments to effectively address fires in order to protect surrounding communities that are part of County jurisdiction, including Fee land. This policy must also be enhanced by developing additional protocols for protecting nearby

schools and homes from smoke and odor and other types of pollution exposure - especially those living in poorly weatherized mobile homes.

- Work with employers across the County to provide hazard pay and additional worker protections to outdoor workers, including mask distributions and a County-wide multi-lingual alert system to outdoor workers and employers when wildfire smoke reaches unhealthy levels.
- Create and implement an illegal dumping monitoring system to identify dumping hot spots and implement preventative measures like fines for businesses or individuals dumping on both County and Tribal land. This policy shall also be co-developed with input and support from Tribal governments.
- Implement and fund a notification system to ensure that nearby residents, employers, educational facilities, and other institutions to facilitate implementation of safety measures and safety precautions.

Critical Facilities

Unincorporated Riverside County lacks access to critical facilities that provide reliable infrastructure, resources, and other benefits. The Draft focuses its recommendations on infrastructure for new development and does not adequately address infrastructure upgrades needed in existing communities. In order to provide upgraded, resilient, and sustainable infrastructure, we recommend the County to update its policies with the following infrastructure inclusions:

- As mentioned in the draft, communities in the ECV experience extensive flooding during heavy rain which can have severe impacts on roads, shoulders, and creates dangerous roadways. The County must conduct an analysis of areas that currently experience intense flooding and develop a strategy on how to reduce those impacts
- Identify critical facilities like parks, community centers, and other sites (i.e., the North Shore Community Park) that are at risk of flash flooding and extreme weather events and develop additional protections to prevent future damage and hazards for residents using those facilities.
- Existing infrastructure in unincorporated areas is non-existent in some places, incomplete in others, and generally inadequate. The County must prioritize transportation project investments, including through the use of general funds, discretionary state and federal resources and other resources available to the County in disadvantaged communities.

Such projects shall include paving of mobile home parks to reduce air quality impacts, active transportation infrastructure with protective measures, and additional safe routes to schools and other critical facilities. For community-identified projects, please continue referring to the Regional and Neighborhood Mobility Plans for the ECV and the ECV Climate Resilience Action Plan.

- The plan must address the impacts that extreme weather is having on the electrical power grid, it must note the urgency that's needed in upgrading and safeguarding climate resilient infrastructure in order to prevent future power outages and their impacts to residents. The County must work with IID to address this issue with more urgency, collaboration, and funding support.
- We greatly appreciate the inclusion of community resilience centers in the Draft to be located across unincorporated areas. This is a much needed and often requested resource in the ECV, especially to provide refuge during extreme heat and power outages, more gathering spaces, and centralized locations to provide more direct community and health services and other benefits in rural areas. Such resilience centers were also identified as a top priority by residents throughout the COVID-19 pandemic. In unincorporated ECV, organizations, agencies, and residents struggled to find accessible facilities to provide COVID-19 testing, medical services, food distribution sites, and vaccination clinics. Having open and community-oriented resilient centers can greatly provide a safe environment for multiple resources. With the allocated funding from the American Rescue Plan (ARP), the County has an incredible opportunity to fund a community health and resilience center in the ECV immediately. Residents will continue advocating for this project and urge the County to respond appropriately using ARP funding.

Climate Change-Related Hazards

As stated in the Climate Change Vulnerability Assessment and given the current underdeveloped and under-resourced conditions of unincorporated communities in Riverside County, effective climate change mitigation, adaptation, and prevention are crucial to protect the most vulnerable communities. The ECV is particularly vulnerable because of its geographic characteristics, limited and outdated infrastructure, and frequency of extreme weather events. The Draft recognizes that damage from severe weather will continue to occur, but lacks policies that will expedite and effectively drive improvements to existing infrastructure to mitigate the impacts of climate change, and most importantly to help prevent severe impacts and damages to people's health, livelihoods, and the environment. The lack of urgency and sufficient implementation strategies do not meet the severity of the impacts already impacting the region. The County must update the Draft to reflect this urgency.

Environmental Justice communities have collaboratively developed various community and climate resiliency plans that can help the County achieve its goals. In the ECV, this includes the Regional and Neighborhood Mobility Plan and the ECV Action Plan for Climate Resilience. These plans include resident-identified projects and infrastructure improvements that can provide more accessibility and amenities in the community, but also provide mitigation and adaptation to climate impacts. The County must include action driven policies that will facilitate the implementation of County, community, and other agency-developed plans, including dedicating investment to these efforts from the County's General Fund, and actively applying to diverse funding programs that prioritize projects in disadvantaged and environmental justice communities.

Additional policies to address climate change-related hazards are outlined below:

- Work with the appropriate agencies to expedite consolidation projects in disadvantaged communities to reliable water and wastewater systems to eliminate exposure to groundwater contamination and cross-contamination between groundwater and wastewater from septic systems. This includes communities most at risk, including Polanco Parks and other mobile home communities in the ECV. The County must also provide ongoing and emergency assistance to retrofit domestic wells as a short-term solution and identify a response protocol for providing emergency water supply to communities that rely on domestic wells when there are power outages.
- Implement new requirements for drought-tolerant landscaping across the region to address issues of water and recycled water. The County must enforce effective uses of water to ensure that all residents within the County are receiving safe and affordable drinking water.
- Enforce the appropriate working conditions standards across all agricultural employment facilities that help protect the health and safety of farmworkers, this includes working with the appropriate agencies to regulate the use of harmful pesticides, and protect other labor rights within the workplace.
- Work with the South Coast AQMD and the AB 617 Community Steering Committee to establish a pesticide application notification system through the use of technology and other means and in multiple languages.
- Increase the amount of thermal comfort infrastructure that exists in communities that experience above normal temperatures and extreme heat, particularly in key community locations, like parks, picnic areas, bus stops, schools, and other gathering places or sites frequented by residents.

- Effectively evaluate the potential impacts of projects and developments, including energy production (including renewable energy production), golf courses, recreational facilities, and other types of developments that may bring about additional environmental and public health impacts and that perpetuate the unequal use of and allocation of natural resources.
- Through the creation and implementation of the Polanco Park Permitting Program, establish a strong policy on weatherization for mobile homes to provide safer homes to residents living in mobile home parks and mobile homes in general. In addition, further revitalization efforts shall be led to increase greening, cool paving, and other infrastructure improvements to energy, water, and wastewater in mobile home parks. This can be combined with the new Mobile Home Replacement program funded through the Unincorporated Communities Initiative.
- In addition to what's currently written in S 7.14, require employer training to ensure they are implementing adequate protective measures and safe working conditions. In addition, the County must develop a process for anonymous reporting of unsafe working conditions and other exploitative practices to the County and Cal OSHA.
- Reduce the urban heat-island effect by implementing cool pavement across different infrastructure projects, including unpaved mobile home parks, urban greening, active transportation infrastructure, road improvements, and other projects that can also combine greening with other needed infrastructure
- Develop protective measures and standards for mobile homes in high seismic areas, including technical assistance and funding.

Timeline and Implementation

While strong policy language is important, incorporating expected timelines and direction for implementation of these policies is equally important. As it stands, the Draft does not provide any information on how the County expects to implement the policies included in the Safety Element. This is particularly concerning given the fact that the resident safety is of the utmost importance and the County must work urgently to implement these policies and programs.

According to [SB 379](#), the County must include “a set of feasible implementation measures designed to carry out the goals, policies, and objectives identified”. Without this, it is unclear how the County plans or expects to successfully and expeditiously implement the Draft or recommended policies. In order to comply with existing state law, the County must update this

draft to include specific and time bound implementation measures for the public to review before adoption and address other recommendations included herein.

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Climate change will continue to worsen and unincorporated communities who have been historically disinvested in will continue to bear the brunt of those impacts, putting residents' health and livelihoods at risk. We strongly urge the County to include the above recommendations in the Draft and ensure that there is meaningful and streamlined implementation. The County must ensure internal consistency with other elements, especially those pertaining to safety, healthy communities, and environmental justice. Protecting residents and improving the built environment and infrastructure systems of unincorporated communities will better set up communities to be more resilient to climate change.

Sincerely,

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