



**THE COUNCIL OF INDUSTRIES**  
P.O. BOX 70088  
Pt. Richmond, CA 94807  
(510)215-9325 office (510)215-9029 fax  
[www.councilofindustries.org](http://www.councilofindustries.org)

January 6, 2012

Mayor McLaughlin  
City Council  
Bill Lindsay, City Manager  
Richard Mitchell, Planning Director  
Randy Riddle, City Attorney  
Mary Renfro, Assistant City Attorney  
Hector Rojas, Planner

Re: GENERAL PLAN RESOLUTION NO. 11-20: Resolution of the planning commission of the City of Richmond Recommending to the City Council of the City of Richmond Adoption of the Richmond General Plan 2030.

The Council of Industries (COI) is pleased to continue to participate in the review process and provide comments regarding the General Plan (the Plan). We believe that economic growth in our City is a top priority. This requires business and the City to partner and grow the local tax base with policies, practices and pronouncements that are not limited to encouraging only pure-play green companies, but support attraction and growth of a diverse group of business and industry to match the City's diverse local workforce.

Whereas the City has supported collaboration and open communications, the Planning Commission failed to follow due process, community review and commentary, and overall transparency of action at their November 3, 2011 final meeting on the General Plan. The proposed amendments, provided by Oakland-based Communities for a Better Environment (CBE), were passed by the Planning Commission on November 3, 2011 with no public notice, review or comment. In fact the letter submitted by the CBE was received *after* written public comment and oral public comment was *closed on October 6, 2011*.

**Resolution No. 11-20 circumvents this process and does not support these shared objectives. Therefore we ask that the City Staff and City Council not adopt the recommendations sited in the Resolution. Specifically:**

**(1) Reject the Industrial/Commercial and Land Use Ordinance (GP Action EC1.d).** This suggests a new ordinance with specific requirements to replace equipment with only "efficient, least-emitting technology." This will constrict current and future business development including business and manufacturing in the green-sector, food manufacturing, biofuels development and manufacturing, even gas stations. We recommend maintaining the standard of current best available technology (CBAT) which includes environmental impact/reduction considerations.

**(2) Reject local air quality regulation that would duplicate and conflict with Federal, State and Regional regulation (GP Actions EC5.C, CR5.E, Policies EC1.1, EC5.3, Action HW9.U).** The COI supports the City working with established Federal, State and Regional regulatory agencies which provide comprehensive regulation of air pollution using specified health, economic and technical criteria.

**(3) Reject Climate Action Leadership and Advocacy Changes (Actions EC1.A, HW10.A and CN5.E).**  
The COI has continued to support and collaborate with City staff on the Climate Action Plan as well as the Leadership and Advocacy elements of the General Plan.

**We further ask the Council to consider the recommended changes previously submitted by the COI (attached)**

The General Plan is a robust document which has included hundreds of hours of public comment and discussions. It has included environmental protections to make Richmond a better place. The addition of the Climate Action Plan and the Health Element are supportive of this focus and the business community has expressed a commitment to collaborate with the City on these programs. These programs dovetail with the strict environmental regulations and protections in place by the Federal, State and Regional agencies to protect the health of the community. What the City does not need is to alienate the community, business, industrial neighbors and future development, and force draconian measures that are not in the best interest of the overall community in the City of Richmond.

The proposed amendments, if adopted, are very harmful to future economic development and jobs creation in the City of Richmond. They are not conducive to incentivizing businesses to move to Richmond, but clear distractions for businesses – small to large – not to move here. Nor has the impact of these recommendations been considered for those businesses that currently are committed to and supportive of the City. The City must take a serious look at the economic impact that the recommendations will have on current and future economic growth for a City that finds itself at an unemployment rate of 15.3%

The recommendations would also duplicate rigorous environmental regulations that have helped improve air quality in Richmond over the past two decades. We need a General Plan that supports the City's need to protect the environment and create jobs and drive economic development.

In the spirit of collaboration, the COI would like to emphasize our commitment to work with the City on the Plan and have included a summary report of outstanding key concerns that will impact the economic viability of the business community, and overall, the City of Richmond. The efforts of the business community are to transparently provide not only concerns, but recommendations that will enhance the economic growth and local tax base of the City of Richmond. Thank you for your time and continued open communications with the business community.

Sincerely,

Katrinka Ruk  
Executive Director

Attachments

Cc: COI Board of Directors  
Judy Morgan, Richmond Chamber of Commerce