



Yana Garcia
Secretary for
Environmental Protection



P.O. Box 806 • 1001 "I" Street, Sacramento, California 95812-0806



Gavin Newsom
Governor

Andrew Rakestraw
Board Chair

Alexis Strauss-Hacker
Vice Chair

Sushma Bhatia
Member

Ingrid Brostrom
Member

Georgette Gomez
Member

Memorandum

November 17, 2025

From: BES Metrics Subcommittee: Board Member Sushma Bhatia, Board Member Ingrid Brostrom, Executive Officer Swati Sharma, Sr. Staff Engineer Linda Ocampo.

Subject: BES Metrics Subcommittee Recommendation on Proposed HWMP Performance Metrics

Introduction

The Board of Environmental Safety (BES) is responsible for developing performance metrics for the Department of Toxic Substance Control (DTSC) and its programs, in consultation with the Director, as mandated by Health and Safety Code 25125.2(b)(4). To fulfill this responsibility, the board established a Metrics Subcommittee to work with DTSC program leadership, develop metrics for each of DTSC programs, and present recommendations to the full board.

Background and Approach

This document provides an overview of the proposed performance metrics for DTSC's Hazardous Waste Management Program (HWMP), developed through collaboration between BES Metrics Subcommittee and HWMP leadership. These metrics are presented to provide additional context to inform BES members and stakeholders ahead of the November 17, 2025, BES meeting.

In April 2024, the Subcommittee began working with HWMP's Permitting, Enforcement and Emergency Response (EERD), and Office of Criminal Investigations (OCI) divisions to identify metrics that effectively capture program activities and outcomes. The proposed metrics were drawn from DTSC's Strategic Plan Dashboard and supplemented with the addition of new performance metrics developed by the Subcommittee. To understand the program deliverables and structure, reviewed the intent of metrics currently tracked and

identify core metrics that provided meaningful insights, effectively measured program outcomes, and relevant to the statutory requirements.

At the March 19, 2025, BES meeting, the subcommittee presented the proposed HWMP metrics for discussion. During public comment, several stakeholders requested additional time for review and recommended that the Subcommittee evaluate the potential for incorporating qualitative metrics to complement the existing quantitative framework. In response, the Subcommittee postponed the board vote and initiated an extended review and engagement period.

Between March and May 2025, the Subcommittee met with multiple stakeholder groups, including community representatives, environmental organizations, and regulated entities to gather further input and explore suggestions for refining the proposed metrics. On April 2, 2025, BES issued a public notice and e-blast announcing an additional 30-day comment period through April 30 to solicit written feedback. The Subcommittee reviewed all comments received and incorporated clarifications where feasible.

While the Subcommittee recognizes that qualitative metrics can offer valuable context, their implementation would require the development of a consistent, transparent framework to ensure reliability and comparability across data sets. At this time, the Subcommittee recommends continuing with the quantitative metrics presented here, while continuing to investigate the best way to integrate qualitative metrics in future iterations.

Recommendation

The Subcommittee recommends approving and implementing the enclosed set of performance metrics for HWMP's Permitting and Enforcement divisions. The proposed metrics provide a structured starting point for tracking program efficiency, timeliness, compliance, and enforcement outcomes that in turn drive health protective outcomes for communities. Together, these metrics will support continuous improvement, transparency, and accountability in DTSC's Hazardous Waste Management Program.