

Integrating Environmental Justice into the General Plan -
Leveraging Regional Air Planning and Community Engagement

Client Report for the Bay Area Air Quality Management District

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Table of Contents

Title Page	1
Table of Contents	2
Abstract	3
Introduction	3-6
History of Environmental Justice.....	6-9
Legislative Background.....	10-13
Research approach and Methods.....	13-15
Statewide SB 1000 Implementation Summary Tables.....	15-19
Regional Background: EJ and Air Quality in the Bay Area.....	20-22
Regional Recommendations to Achieve EJ.....	23-24
Air Pollution and Health Data Analysis and Recommendations.....	24-30
Case Study: San Francisco.....	31-48
Local EJ Context.....	31-33
Integrating EJ into the General Plan.. ..	33-48
Defining EJ and SB 1000 Goals and Objectives.....	33-37
Auditing the General Plan for EJ and Recommendations.....	37-43
Planning at the Neighborhood Level: The Central Freeway.....	44-48
Case Study: Oakland.....	48-59
Local EJ Context.....	49-52
Key Stakeholders.....	52-57
Developing Internal Capacity for Community Engagement.....	57
Recommendations for Meaningful Community Engagement.....	58-59
Conclusion.....	59-60
Appendix.....	61-72
EJ Charrette Methodology.....	61
SF Planning Charrette Proposed EJ Definitions Summary.....	62-64
SF Planning Charrette Additional SB 1000 Goals and Objectives.....	65-67
Stakeholder Interview Guide.....	68
Stakeholder Interview Key Findings Summary.....	69-72

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Abstract

The purpose of this report is to provide cities and counties throughout the state of California with strategies for how they can incorporate environmental justice (EJ) into their General Plans, especially in response to Senate Bill (SB) 1000, the Planning for Healthy Communities Act of 2016. Many communities have had difficulty implementing SB 1000, due in large part to limited funding and a lack of coordination between SB 1000 and other existing EJ-focused legislation, such as AB 617 and climate equity initiatives, such as AB 375's Sustainable Community Strategies. This report considers how regional air districts and local planning departments can address these challenges by bridging gaps between SB 1000 and other ongoing air quality planning and community engagement efforts. The guidance in this report is based on an analysis of the EJ policy implementation efforts made by local and regional planning departments [such as] the San Francisco Planning Department and the Bay Area Air Quality Management District ('Air District'), which has been a key player in regional EJ planning. This report is intended to provide planning departments and Air District staff with the knowledge, principles, and strategies to begin planning for EJ, especially as it relates to air quality, public health, and community engagement. The report presents two case studies: an analysis of how EJ could be incorporated into San Francisco's General Plan, considering its Air Quality, Environmental Protection, and Transportation Elements and recommending opportunities for further EJ integration, and how the Community Air Protection Program (AB 617), stakeholder engagement in the City of Oakland (where much EJ engagement has already taken place), and pollution and health data (from CalEnviroScreen) can lead the SB 1000 EJ Element efforts. The methods used to develop this report included a literature review, and statewide case study review, stakeholder interviews, a Planning Department EJ charrette¹, and data analysis using Geographic Information Systems (GIS) and Python. Finally, this report provides guidance on how local Bay Area-based planning departments and the regional Air District can work together to leverage state air protection, health equity, and community engagement planning legislation and funding as part of their EJ policy implementation process.

Introduction

SB 1000 was signed into law by former Governor Jerry Brown on September 24th, 2016. It requires cities and counties to adopt a separate EJ Element or integrate EJ goals, objectives, and policies into other elements of their General Plans when both of the following conditions apply: 1) One or more disadvantaged communities exist within its General Planning area² and 2) Two or more elements are adopted or revised concurrently in its General Plan on or after January 1st, 2018.³ Prior to the bill's passage, a number of cities throughout the state had already incorporated EJ Elements and policies into their General Plans: such as National City and Jurupa Valley. These early-adopters and their processes became the impetus for the bill and established

¹ A "charrette" is a community-input meeting commonly used in planning practice.

² For an explanation of what makes a community "disadvantaged" see the Legislative Background Section.

³ Leyva, C. SB-1000 Land use: general plans: safety and environmental justice, Pub. L. No. 1000 (2016).

model legislation that the bill was based on.⁴ Other jurisdictions have now started to consider how they can comply with the legislation in a way that best responds to their local circumstances. In San Francisco for example, the Planning Department has decided to integrate EJ objectives and policies throughout their General Plan Elements. Other Bay Area cities such as Oakland are still deliberating on how to best approach the SB 1000 mandate. Much of this report is based on work that was done over the summer of 2019 at the San Francisco Planning Department and later work that was done in conjunction with the Air District in the Fall of 2019. San Francisco and Oakland are unique cities with their own set of EJ and planning challenges and opportunities. However, the strategies that were used for the city of SF to begin integrating EJ and the challenges Oakland is facing in regard to engaging a very active and quite sophisticated community EJ base are generalizable. One of the goals of this report is to explain these strategies and share lessons that were learned in order to help other jurisdictions prepare to do the research, internal capacity building, and community engagement necessary to conduct a robust planning process related to EJ policy development and integration. Another goal is how the SB 1000 mandate can work together with some of the other relevant state legislative EJ and health equity concerns and mandates that are also vying for attention, community engagement, and staff time. In urbanized areas, one of the most pressing EJ issues is air quality and the disparity of local health impacts. As a result, one of the most significant reactions is that the State has invested about \$495 million, through the regional air districts, to further AB 617 requiring local community air planning in disadvantaged communities.⁵

The Air District as a Key Player in Regional EJ Planning

In addition to directing AB 617 programs and funding in the Bay Area, the Air District been engaged in technical assistance relationships with local planning departments throughout the Bay Area for decades. For example, the Air District provides technical assistance to planning departments and other stakeholders for CEQA guidelines pertaining to Air Quality and greenhouse gas emissions (GHGs). This includes specific pollution control measures, such as the Regional Clean Air Plan. The Air District also serves as a conduit to the State Air Board who governs AB 32 and SB 375 and provides GHG emission calculations and modeling projections.

In terms of funding, the Air District provides millions of dollars of pass-through funds annually for transportation-related mitigation projects, and it has provided funds for “Community Risk Reduction Planning” (e.g. in San Francisco that helped lead to the city’s Article 38 Air Pollution Exposure Zone policy). The Air District fought for resident protections from air pollution in transit-oriented development projects at the State Supreme Court and provided policy guidelines for “Planning Healthy Places” across the region.⁶ The Air District has convened EJ advocates across the region to help construct “cumulative impact” policies and develop mitigation plans for key “poster-child” EJ

⁴ California Environmental Justice Alliance. (2017 October). SB 1000 Implementation Toolkit (Publication). Retrieved from: <https://caleja.org/2017/09/sb-1000-toolkit-release/>

⁵ Community Air Protection Incentives to Reduce Emissions in AB 617 Communities. California Air Resources Board. (2020, February 28). Retrieved from: <https://ww3.arb.ca.gov/msprog/cap/capfunds.htm>

⁶ Coon, A. (2015, December 18). California Supreme Court Holds “CEQA-In-Reverse” Is Not the Norm.

battles such as the Oakland crematorium and foundry, Richmond area refineries, and San Francisco Bayview Hunters Point Naval Shipyard project.⁷ To some extent, the delay in achieving progress on certain EJ fronts and the fact the Air District has no land-use authority in cities is part of the impetus for the passing of SB 1000. The goal of SB 1000 is to implement meaningful and effective EJ policies in places where they are needed the most. The Air District can and must continue to step up and provide support to ensure that this happens when local governments are unable or unwilling to work towards this end.

The key takeaways from this report include:

- Pollution is not confined to the borders of local jurisdictions, and it is important for planners and advocates of EJ to consider regional approaches. This is especially true for widespread regional EJ issues, such as air pollution, transportation, housing, and natural resource management. **This report includes a set of strategies that the Air District and local jurisdictions can use in order to incorporate regional considerations into their SB 1000 implementation efforts.**
- One of the most important goals of SB 1000 is to get local jurisdictions to develop and implement EJ policies that result in healthier environments for California's most disadvantaged communities. Given the prevailing attention on air pollution from the community perspectives, the health professionals, and state regulators, this report includes an **analysis of the relationship between different types of air pollution and negative health outcomes using online data tools.** Based on this analysis, recommendations are made to provide the Air District and local jurisdictions with guidance on **best practices for addressing air pollution and negative health outcomes through planning practice** that can shape specific EJ policies.
- Given the complex nature of EJ, there are many different ways it can be defined. Going through the process of creating a unique definition is an effective way to get an organization or department on the same page about what EJ means to them and provides a coherent starting point for a department to engage with their constituents around issues related to EJ. To this end, **the report provides a strategy for how cities can develop a definition of EJ that is relevant to their local context.**
- Another takeaway is directly related to the SB 1000 legislation, which encourages cities to develop EJ-focused goals, such as reducing air pollution exposure. This report outlines a **strategy for how to accomplish this task in a way that responds to uniquely local challenges.** This strategy is based on a case study of the steps taken by the city of San Francisco to build their internal capacity to incorporate EJ into the planning process and general plan, in which the author was directly involved.

⁷ Bay Area Environmental Health Collaborative. (2019, September). *Pollution Reduction Protocol and Proposed NSR Amendments*. PowerPoint.

- Another vital component of SB 1000 and the field of EJ more broadly, is the importance of *meaningful* community engagement. This report explains what meaningful community engagement means and **outlines a process that can be used to conduct meaningful community engagement for SB 1000, AB 617, and other EJ and air quality-related legislation**. This section of the report is based largely on the case study of the City of Oakland's efforts conducting EJ stakeholder engagement that can be lifted up for SB 1000 planning.
- Lastly, the **appendix contains additional sources of information such as a methodology for conducting an SB 1000 charrette, recommended EJ goals and objectives, government publications, and findings from Bay Area-based EJ advocate outreach that could be useful in the SB 1000 implementation process** and for which the Air District could utilize as part of their web-based regional SB 1000 technical assistance tool-kit.

There are many recommendations made throughout this report, such as strategies to incorporate state and regional air quality legislation into SB 1000 implementation and factors to consider when deciding whether to integrate a stand-alone EJ Element or EJ objectives and policies throughout other General Plan Elements. It is hoped that planners, Air District staff, and local stakeholders will be able to find information that is useful to their particular jurisdiction (local or regional) needs by focusing their reading on the topics of most importance to their work.

Before local jurisdictions can go about developing definitions, goals, or policies related to EJ, it is important that they understand the historical and modern-day context of EJ in their communities. What instances of historical injustice have occurred? What public decisions and planning practices have led to EJ harms (e.g. siting decisions, expulsive zoning, urban renewal, and other histories that have created racial and economic segregation and disinvestment that leave such communities vulnerable to be located near environmental hazards and cumulative health and environmental burdens and displacement during cleanup)? Which neighborhoods and populations are dealing with the greatest exposure to environmental harm? What have the Air District and local cities, or more specifically, local planning departments done to identify, quantify, and address injustices and harms? This history and legacy of actions will likely be on community members minds during engagement. Furthermore, it is important for local planning jurisdictions to understand why EJ matters to the wellbeing of Bay Area residents and the unique importance of air quality to environmental health which typically lays beyond the core land-use focus of most local planning.

History & Definition(s) of Environmental Justice

The EJ movement, like many other movements, does not have precise origins or boundaries. At its core, the concept of EJ is about the impacts of environmental and land-use policies on low-income communities of color especially when these impacts occur in a disproportionate and inequitable manner. The history of EJ is rooted in community organizing to address environmental racism.⁸ EJ issues vary widely across

⁸ Carder, E. (n.d.). The American Environmental Justice Movement. Internet Encyclopedia of Philosophy.

time and place, but often include the siting of pollution, in the form of toxic waste management facilities, refineries, and other industrial activities. They also include a lack of adequate infrastructure, such as parks, open space, and upgraded water and sewer facilities. Poor transportation planning has exposed certain communities to high concentrations of air pollution while failing to provide these neighborhoods with sufficient public transportation options. Another key component of EJ is that poor communities of color often lack ownership or even influence over the decision-making processes that shape the land, housing, and infrastructure that make up their neighborhoods. In some cases, these communities have been discriminated against and actively encouraged not to participate in these processes.⁹

EJ is not a new issue. The term emerged in the 1980s as civil rights activists began to campaign against indiscriminate siting of toxic facilities in their communities. Subsequent reports by the United Church of Christ and the U.S. General Accounting Office confirmed widespread discriminatory policies leaving low income communities of color overburdened by pollution and unprotected by more stringent Federal environmental regulation enacted in the 1970s.^{10,11} (EJ activists first raised the issues of disparate pollution, unequal enforcement of environmental regulations, and later lack of meaningful involvement in decision-making).

A local historical example of EJ was freeway development and the practice of redlining in San Francisco (see Figure 1). These processes led to major health and economic inequalities predominantly in low income communities of color that persist today. In response to these injustices, voices of resistance emerged throughout the country, including educators such as Dr. Robert Bullard and Dr. Dorceta Taylor, indigenous leaders such as Winona LaDuke and Tom Goldtooth, and countless other community leaders and local activists. In 1991, many of these EJ activists came together at the First National People of Color Environmental Leadership Summit and created the Principles of Environmental Justice.¹² These documented principles, perhaps better than any single definition captures the dynamic and multifaceted nature of EJ. These principles cover issues ranging from political and cultural self-determination and the destructive activities of multi-national corporations to the sacredness of Mother Earth. These principles helped lay the foundation for the hundreds of grassroots EJ leaders, organizations, and movements that have emerged since the summit.

In addition to the growing grassroots EJ movement, the Environmental Protection Agency (EPA) created the Office of Environmental Justice in 1992. This office, though

⁹ Arnold, C. (2007). Fair and Healthy Land Use: Environmental Justice and Planning.

¹⁰ Chavis, B., & Lee, C. (1987). Toxic Wastes and Race in the United States. Commission for Racial Justice, United Church of Christ. Retrieved from <http://uccfiles.com/pdf/ToxicWastes&Race.pdf>

¹¹ Resources, Community, and Economic Development Division, U.S. General Accounting Office. (1983). Siting of Hazardous Waste Landfills and Their Correlation with Racial and Economic Status of Surrounding Communities (No. RCED-83-168). Retrieved from <https://www.gao.gov/assets/150/140159.pdf>

¹² The Principles of Environmental Justice (EJ). (1991, October 27). Retrieved from <https://www.ejnet.org/ej/principles.html>

hamstrung since 2016 by the Trump administration¹³, enacted important programs and policies and continues to provide important tools such as EJScreen, which allows for increased data transparency about the disproportionate distribution of toxic pollution in certain communities.^{14,15} The office of Environmental Justice defines EJ as “The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies”. Despite the progress made by the Office of EJ, there are still many disproportionate environmental burdens placed on the country’s most vulnerable communities. With the Trump administration’s continued rollbacks on environmental protections, state, regional, and local policies such as SB 1000 have become increasingly important alleviate unequal environmental burdens.

The definition of EJ has been the subject of debate for some time. So much so that AB 1628, a bill that passed in September of 2019 was designed to enhance the state’s definition of EJ to include the “meaningful involvement” of all people in environmental or land use decisions.¹⁶ According to the California Environmental Justice Alliance, a co-sponsor of the bill, “Adding ‘meaningful involvement’ encouraged state and local agencies to recognize that the community shouldn’t just be informed or talked at; rather, that community members should be engaged and involved in these important decisions.”¹⁷

Even with the passing of AB 1628, there are still those in the EJ movement that take issue with the government’s definition of EJ feeling that it doesn’t go far enough. Rather than the state’s current definition which calls for the “fair treatment of people in the development of laws and regulations that affect every community’s natural surroundings,” some activists feel that EJ should be about the eradication of environmental pollution rather than just a fair distribution of it.¹⁸ This lack of clarity about how to define EJ should be viewed as an opportunity rather than an obstacle. In the Strategies for Community Engagement section of this report, a methodology for a community engagement activity is outlined that can be used to get input from local residents so that local communities can define EJ as they see fit. In doing so, new insights can be found as to how to best integrate EJ into the General Plan.

¹³ Popovich, N., Albeck-Ripka, L., & Pierre-Louis, K. (2019, December 21). 95 Environmental Rules Being Rolled Back Under Trump. *New York Times*.

¹⁴ McKenna, P. (2017, March 9). Chief Environmental Justice Official at EPA Resigns, With Plea to Pruitt to Protect Vulnerable Communities. *Inside Climate News*.

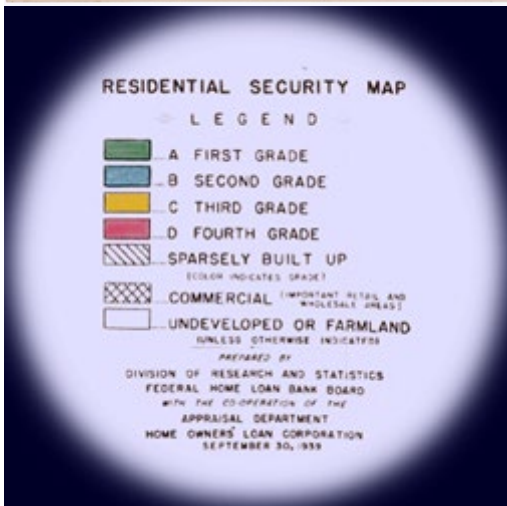
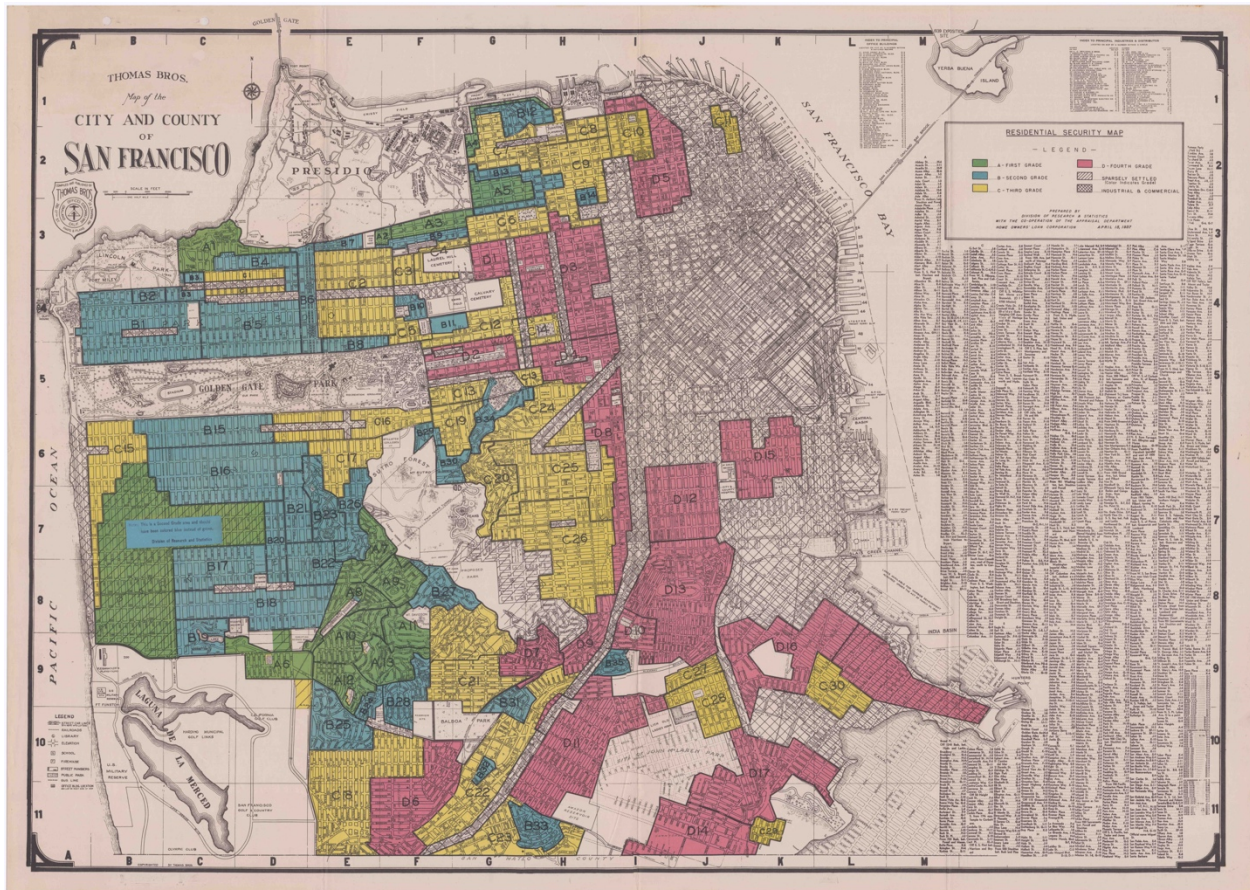
¹⁵ EJSCREEN: Environmental Justice Screening and Mapping Tool. (n.d.). Retrieved from <https://www.epa.gov/ejscreen>

¹⁶ Rivas, R. AB-1628 Environmental justice, Pub. L. No. 1628 (2019).

¹⁷ Our Health, Our Power: What Environmental Justice Means to Us. (2019, August 13). [California Environmental Justice Alliance].

¹⁸ *Environmental Justice & Environmental Racism*. (n.d.). Retrieved from <http://greenaction.org/what-is-environmental-justice/>

Figure 1: Historical Map of Redlining in San Francisco from 1936-1939



"Red areas are characterized by detrimental influences in a pronounced degree, undesirable population or infiltration of it. Low percentage of home ownership, very poor maintenance and often vandalism prevail. Unstable incomes of the people and difficult collections are usually prevalent. The areas are broader than the so-called slum districts. Some mortgage lenders may refuse to make loans in these neighborhoods and other will lend only on a conservative basis." – Home Owners Loan Corporation, September 30th, 1939

Sources: Redlining and Gentrification. Retrieved from <http://www.antievictionmappingproject.net/sfredlining.html>
 Testbed for the Redlining Archives of California's Exclusionary Spaces. Retrieved from <http://salt.umd.edu/T-RACES/colormap.html>

Legislative Background

This section discusses the development of a number of California State bills and acts that are relevant for EJ and SB 1000 including SB 535, AB 1550, SB 375, SB 1000, AB 617, SB 379, and the California Environmental Quality Act (CEQA).

SB 535 & AB 1550: Greenhouse Gas Reduction Fund (GGRF)

In 2012, the Legislature passed SB 535, directing that 25 percent of the proceeds from the GGRF (see Assembly Bill 32) go to projects that provide a benefit to disadvantaged communities (DACs). This language was subsequently amended through AB 1550 so that the funds must go to projects that are *located directly in* DACs, not just projects that benefit these areas.¹⁹ The legislation gave the California Environmental Protection Agency (CalEPA) responsibility for identifying those communities, and in 2016, the Legislature passed AB 1550, which requires that 10 percent of proceeds from the fund be spent on projects located in low-income communities, thus expanding the amount of eligible areas. Low-income communities are defined as “those with household incomes at or below 80 percent of the statewide median income or with household incomes at or below the threshold designated as low-income by the Department of Housing and Community Development’s (HCD) State Income Limits adopted pursuant to Section 50093.”²⁰ To help determine which communities would be classified as disadvantaged, CalEPA used the California Communities Environmental Health Screening Tool (CalEnviroScreen), an online screening tool that identifies California communities by census tract that are disproportionately burdened by, and vulnerable to, multiple sources of pollution.²¹

SB 375: Sustainable Communities and Climate Protection

In 2008, SB 375 passed, targeting greenhouse gas emissions from passenger vehicles and requiring all metropolitan regions to develop a Sustainable Communities Strategy (SCS) as part of a Regional Transportation Plan. In the Bay Area, the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) are jointly responsible for developing and adopting a SCS that integrates transportation, land use and housing to meet greenhouse gas reduction targets set by the California Air Resources Board (CARB).²² These regional agencies offer funding and technical assistance that is tied to the implementation of SCS and that can be used in EJ planning processes such as SB 1000.

¹⁹ SB 535 Disadvantaged Communities. (n.d.). Retrieved from <https://oehha.ca.gov/calenviroscreen/sb535>

²⁰ Ibid.

²¹ *CalEnviroScreen 3.0* (2018, June). Retrieved from: <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>

²² Plan Bay Area 2040 Final Plan. (n.d.). Retrieved from <http://2040.planbayarea.org/what-is-plan-bay-area-2040>

SB 1000: Conditions that Trigger Mandatory Implementation

As mentioned earlier, SB 1000 requires local governments to prepare an EJ Element or integrate EJ-related policies into other elements when both of the following conditions or “triggers” apply: 1) One or more Disadvantaged Communities (DACs) exist within its General Planning area and 2) Two or more Elements are adopted or revised concurrently in its General Plan on or after January 1st, 2018. Figure 5 shows that the first condition is met by well over a dozen different jurisdictions in the Bay Area.

General Plan Element Updates & SB 1000 Goals & Objectives

Whether or not local jurisdictions meet the second condition i.e. updating two or more of their General Plan elements concurrently, varies greatly as local governments differ in how often and how long they spend updating their General Plan Elements. Alternatively, local jurisdictions can voluntarily adopt an EJ Element or integrate EJ policies into its General Plan, regardless of whether or not they have a disadvantaged community or are updating their General Plan Elements. Another key component of SB 1000 is the required goals and objectives. The legislation requires jurisdictions implementing SB 1000 to “Reduce the unique and compounded health risks in disadvantaged communities” by establishing policies in order to address seven EJ goal areas²³:

1. Reduce pollution exposure and improve air quality.
2. Promote public facilities.
3. Promote food access.
4. Promote safe and sanitary homes.
5. Promote physical activity.
6. Promote “civil engagement” in the public decision-making process.
7. Prioritize improvements and programs that address the needs of disadvantaged communities.

Note: the legislation encourages jurisdictions to pursue additional goals and objectives beyond the seven listed above that are relevant to their local conditions and context. ²⁴

Key Term: Disadvantaged Communities (DACs)

Within the SB 1000 bill text, the language states that jurisdictions that are integrating EJ into their General Plans must, “identify objectives and policies to promote civil engagement in the public decision-making process”.²⁵ Beyond the requirement to “identify objectives and policies” related to this part of the bill, the language is vague and does not clearly outline what “civic engagement in the public decision-making process” actually entails. Interestingly, this is one of a number of topics in which there is room for interpretation as to how the issues should be defined. For example, SB 1000 states that

²³ Leyva, C. SB-1000 Land use: general plans: safety and environmental justice, Pub. L. No. 1000 (2016).

²⁴ Ibid.

²⁵ Ibid.

jurisdictions should “reduce the unique or compounded health risks in *disadvantaged communities*.” It goes on to define disadvantaged communities (DACs) as “Areas identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation. However, the “disadvantaged community terminology is less preferred by groups in the EJ movement who prefer the term “environmental justice communities” because they feel it more accurately describes the neighborhoods that experience the highest cumulative burdens and should therefore be prioritized for greater protections and investment.²⁶

Assembly Bill 617: Community Air Monitoring

In July of 2017, former Governor Jerry Brown signed into law Assembly Bill 617 (AB 617) – a law relating to criteria air pollutants and toxic air contaminants from sources other than vehicles.²⁷ This law laid an important foundation for state agencies such as the California Air Resources Board (CARB) and regional air districts such as BAAQMD to make progress in reducing air pollution that disproportionately impacts DACs. It does so through new air pollution monitoring technologies capable of detecting elevated exposures at a much more granular scale than the conventional ambient air quality monitors. It also aims to establish a community-scale emissions abatement program; updates air quality standards for certain stationary sources located in or contributing to non-attainment areas; provides for improved enforcement and requires community participation in the process. Since 2017 the Legislature has budgeted \$495 million for local air district grants in support of AB 617 implementation. A sizeable portion of this overall pot of money will go to the Air District for use on programs such as incentive programs to reduce stationary sources of emissions. Grant funds may also be used for changes at local industrial facilities that reduce emissions of toxic or smog-forming pollutants, to build zero-emission charging stations, and, importantly for SB 1000, to support local measures that air districts and communities identify through AB 617 Community Emissions Reduction Programs.²⁸

SB 379: Climate Adaptation and Resiliency Strategies

Senate Bill 379 requires local jurisdictions to review and update the Safety Elements of their General Plans to include climate adaptation and resiliency strategies. This update must include a vulnerability assessment identifying risks posed by climate change; adaptation and resiliency goals, policies, and objectives; and implementation measures.²⁹ SB 379’s statutes are similar to SB 1000 in that both involve assessing

²⁶ California Environmental Justice Alliance. (2017 October). SB 1000 Implementation Toolkit (Publication). Retrieved from: <https://caleja.org/2017/09/sb-1000-toolkit-release/>

²⁷ Garcia, C. AB-617 Nonvehicular air pollution: criteria air pollutants and toxic air contaminants, Pub. L. No. 617 (2017).

²⁸ Community Air Protection Incentives to Reduce Emissions in AB 617 Communities. (2020, February 28).

²⁹ Alliance of Regional Collaboratives for Climate Adaptation. (2016). *Introducing SB 379: Climate Adaptation and Resiliency Strategies*.

vulnerabilities of local communities and implementing General Plan goals, policies, and objectives to address those vulnerabilities.

California Environmental Quality Act (CEQA)

CEQA is relevant to SB 1000 because the adoption of an EJ Element and the adoption of a General Plan or General Plan Amendment qualify as discretionary projects, and hence are subject to the CEQA review process.^{30,31} Two approaches are available to local governments to complete the CEQA process for an EJ Element or integrated policies.

- 1) If the EJ Element or integrated EJ policies are being prepared as part of a larger General Plan update, then the analysis of the EJ Element or policies would be folded into the larger General Plan EIR or other CEQA review.
- 2) If the EJ Element or integrated policies is being prepared independent of a larger General Plan update, a stand-alone environmental document must be prepared.

In either case, it may be possible for the required CEQA document to “tier” off of an existing EIR prepared for a previous General Plan.³² Furthermore, integrating EJ policies and objectives into a General Plan would likely enable local jurisdictions to mitigate environmental impacts associated with General Plan updates. In cases where jurisdictions are able to effectively implement their General Plan EJ policies to a sufficient level, they could achieve what is called a “self-mitigating General Plan,” which may serve to mitigate impacts identified in the CEQA analysis of any future General Plan update.³³

Research Approach

Overview

The research involved in developing this report included four systematic phases: 1) a literature review, 2) stakeholder interviews, 3) a charrette for planning department staff to provide feedback, and 4) a data analysis component. The rationale for this approach was that there has been an extensive amount of writing about EJ and it was important to develop a clear understanding of what EJ means within the discipline of city planning. Rather than conducting focus groups or surveys, which can be more resource and time-intensive, stakeholder interviews were used to gather insight from EJ and planning professionals. These interviews were especially helpful in understanding EJ

³⁰ For more background on CEQA and its guidelines, see: https://www.califaep.org/docs/2020_ceqa_book.pdf

³¹ Per CEJA’s SB 1000 Toolkit: Approving a General Plan update (and therefore an EJ Element or integrated policies) is technically feasible under a Negative Declaration, which is a finding that no significant adverse impact to the environment would occur as a result of the project. Since EJ Elements are intended to minimize environmental impacts, they might be likely candidates for Negative Declarations. However, preparation of EJ Elements is also likely to be part of a larger General Plan amendment or update where either potential significant environmental impacts or controversies may arise in other areas of the General Plan. Therefore, an EIR is the safest and most prudent environmental document to prepare.

³² California Environmental Justice Alliance. (2017 October). SB 1000 Implementation Toolkit (Publication). Retrieved from: <https://caleja.org/2017/09/sb-1000-toolkit-release/>

³³ Ibid.

issues in Bay Area jurisdictions, relevant legislation, and local planning contexts. The charrette was used as an efficient way to get a large amount of feedback in a relatively short window of time, from a diversity of perspectives. The data analysis component enabled a greater amount of quantitative analysis and data visualization to help balance the largely qualitative analysis that makes up the majority of the report. The parameters for the first three phases were established within the San Francisco Planning Department's *Integrating Environmental Justice Policies into the General Plan* project. The Oakland case study also played an important role in the second and fourth research phase.

Literature Review

The literature review involved investigation of academic, non-profit, community-based, private, and governmental publications such as articles, PowerPoint presentations, online tools, and web pages, among others. The purpose of the literature review was to discover and analyze best practices and case studies related to SB 1000 implementation, especially as relevant to the context of the San Francisco General Plan. The criteria used for selecting literature included geographic scope, i.e. national, state, and local documents. It also considered time, i.e. ranging from literature that dates back many decades leading up to publications that were released in 2020.

Stakeholder Interviews

Stakeholder interviews were conducted from June 2019 – March 2020 and were used to gather different perspectives about EJ issues in relation to topics such as housing, land use, air quality, Senate Bill (SB) 1000, other EJ legislation, and community engagement. The process for deciding which stakeholders to interview included the following considerations: 1) diversity of organizational background i.e. city/government, non-profit, and grassroots organizations; 2) geographic location: interviewees were based out of a range of destinations: San Francisco, Oakland, and Washington D.C; and 3) work focus: interviewees specialized in a range of EJ topics such as access to public transit, indigenous planning issues, and federal EJ legislation. A semi-structured approach was used in terms of the questions that were asked during interviews, for example many of the same themes were discussed, with some additional questions as new ideas emerged. For a copy of the interview guide and a summary of the results of the stakeholder interviews, see the appendix.

Planning Staff Charrette

To gather feedback on proposed definitions of EJ and SB 1000 EJ goals for implementation into the General Plan, a Planning Staff charrette was held at the SF Planning Department on Tuesday, August 6th, 2019. Approximately 25 staff attended the charrette and participated in activities. Ultimately, the feedback provided at the charrette was incorporated into the final recommendations that have been included in this report. For the methodology and full results of the charrette, see the appendix.

Data Analysis & Mapping

The data analysis and mapping phase occurred from November 2019 – May 2020 and was focused on conducting a number of analyses related to the connections between race and pollution burden, pollution burden and negative health outcomes, and in particular, the relationship between air pollutants such as particulate matter 2.5 (PM 2.5), diesel, and ozone and respiratory illnesses such as asthma and cardiovascular disease. This phase was also intended to create visualizations of environmental injustice and provide readers with visions for how neighborhoods can be imagined in a more environmentally just way. The tools that were used in this phase included ArcGIS, Adobe Illustrator, InDesign, Photoshop, and Python. The primary data source was CalEnviroScreen 3.0, a data mapping tool that is used to identify pollution and vulnerability to pollution's effects that was released in 2017 and updated in 2018.³⁴ The American Community Survey was used to collect census tract demographic data and many different data sources were used in the creation of maps and sketches.

Limitations

Much of this report is based on a case study of the steps taken by the city of San Francisco to build their internal capacity to incorporate EJ into the planning process and General Plan, in which the author was directly involved. Throughout the project, local residents did not have a chance to provide input. This is because of the limited scope of the project, which did not include sufficient time or resources to develop a process capable of *meaningfully* engaging EJ Communities. A second limitation was that SB 1000 passed relatively recently, in September of 2016. While information is available on jurisdictions that integrated EJ Elements into their General Plans prior to the passage of SB 1000, it is more difficult to find accurate and up-to-date information on jurisdictions that are currently in the process of implementing SB 1000. This is due in large part to the amount of time it can take to implement, often multiple years, and the lack of a central location where this information exists. However, there are valuable lessons to be learned from localities that have integrated EJ, such as the framing of EJ language and policies. A final limitation is that since SB 1000 has just started to be implemented in a handful of jurisdictions, it is difficult to analyze whether or not the bill is truly enforceable and measuring its success is not possible at this point, but will make for an interesting research project once more cities have integrated EJ into their General Plans.

Statewide SB 1000 Implementation Summary Tables

Figures 2-4 are tables that summarize jurisdictions across the state where EJ planning processes and element adoptions were completed before SB 1000 passed, were completed after its passage, or are in the process of working on implementation. In the Case Studies section of this report, an in-depth analysis is provided on two Bay Area cities that are at varying phases of SB 1000 implementation: 1) San Francisco (in progress) and 2) Oakland (getting started).

³⁴ Rodriguez, M., & Zeise, L. (2017). *CalEnviroScreen 3.0*. California Environmental Protection Agency, Office of Environmental Health Hazard Assessment.

Figure 2: Statewide EJ/Health/Equity Implementation Summary (Prior to SB 1000 Adoption)

	National City Health & Environmental Element	Jurupa Valley EJ Element	Los Angeles Clean Up Green Up Ordinance	Richmond Community Health & Wellness Element	Alameda County Community Health and Wellness Element
Location	San Diego County	Inland Empire	Los Angeles	SF Bay Area	SF Bay Area
Community Type	Suburban	Suburban	Urban	Urban	Urban
Population	58,582	95,005	3,792,621	103,701	1,671,000
Geographic Area	9.12 sq. mi.	43.68 sq. mi.	502.76 sq. mi.	52.51 sq. mi.	739 sq. mi.
EJ Issues Addressed	Lack of public facilities, Hazardous sites, air and water quality	Air Quality	Air quality	Air quality specifically, and public health broadly	Public Health, Sensitive land uses, Restorative Justice
Community Engagement Process and Leads	City Council, community-based organizations	CCAIEJ and Civic Solutions	City Council, Community-based organizations	Advisory Committee	Advisory Committee
Stakeholders Actively Engaged	Environmental Health Coalition (EHC)	Center for Community Action and EJ (CCAIEJ)	LA Collaborative for Environmental Health and Justice	Richmond Equitable Development Initiative (REDI)	Community Benefit Organizations (CBOs), Planning and Health Departments/ Commissions
Outcome	EJ Element	EJ Element	City ordinance	Health and Wellness Element; integrated policies	Health and Wellness Element
Adopted	June 2011	October 2014	April 2016	April 2012	September 2015

Source: California Environmental Justice Alliance. (2017 October). SB 1000 Implementation Toolkit (Publication). Retrieved from: <https://caleja.org/2017/09/sb-1000-toolkit-release/>

Figure 3: EJ Case Studies Summary (Post SB 1000 Adoption)

	Southwest Fresno Specific Plan	Sacramento County EJ Element	Placentia Health, Wellness, and EJ Element
Location	Central Valley	Sacramento	Orange County
Community Type	Urban	Urban	Urban
Population Size	494,665	1,552,000	51,671
Geographic Area	114.39 sq. mi.	994 sq. mi.	6.6 sq. mi.
EJ Issues Addressed	Hazardous sites, air and water quality	All 7 SB 1000 EJ Issues & Crime Prevention	Public Health, Air Quality, Food Access, Others
Community Engagement Process	Steering Committee	Advisory Committee	Community meetings and street fare surveys
Stakeholders Actively Engaged	Leadership Counsel for Justice and Accountability	CBO's, Churches, Business Districts	Lot 318 Non-profit organization
Outcome	Integrated policies with a Specific Plan	EJ Element	EJ Element
Adopted	October 2017	December 2019	October 2019

Sources: California Environmental Justice Alliance. (2017 October). SB 1000 Implementation Toolkit (Publication). Retrieved from: <https://caleja.org/2017/09/sb-1000-toolkit-release/>
 (2019, November 8). Integrating Environmental Justice Policies into the General Plan [Phone Interview].

Figure 4: Case Studies Summary (SB 1000 Implementation in Progress)

Location	Population Size	Notes and Links
Carson	91,909	<ul style="list-style-type: none"> EJ and Public Health - See Chapter 8 of this document This document contains principles
Corona	168,819	<ul style="list-style-type: none"> Technical update from 2018
Fontana	213,739	<ul style="list-style-type: none"> Received comments on the General Plan - including a letter from the CA Attorney General's Office Finalized the General Plan in 2018
Fresno County	999,101	<ul style="list-style-type: none"> General Plan Website Lack of community input has led to complaints Undergoing a General Plan update Notice or Preparation of a Draft Environmental Impact Report for General Plan Update
Inglewood	109,419	<ul style="list-style-type: none"> Environmental Justice Element
Kerman	15,037	<ul style="list-style-type: none"> GP update does discuss SB 1000, however see the Attorney General's comment letters: 1 & 2
Kern County	900,202	<ul style="list-style-type: none"> Working on a General Plan update that will address SB 1000 - meetings postponed due to COVID-19 Notice from 2017 here CEJA did a SB 1000 workshop for them in 2018
Manteca	81,592	<ul style="list-style-type: none"> Going through a General Plan update and is implementing SB 1000 Existing conditions report - working with De Novo planning group Catholic Charities Diocese of Stockton (CBO) has been involved in this process CEJA did a SB 1000 community workshop with them in 2019
Murrieta	114,985	<ul style="list-style-type: none"> General Plan update

Oakland	429,082	<ul style="list-style-type: none"> • A lot of community engagement has been conducted, EJ communities and issues are well defined • See more in case study (pg. 48-59)
Riverside County	2,471,000	<ul style="list-style-type: none"> • General Plan website • Environmental Impact Report • Progress on EJ in the General Plan • See Attorney General Office's letter to the County
San Bernardino County	2,180,000	<ul style="list-style-type: none"> • SB 1000 Background Report • Program Environmental Impact Report • See Attorney General Office's letter to the County
San Francisco	883,305	<ul style="list-style-type: none"> • Conducted a summer project dedicated to developing a report on EJ policy integration; integrating EJ into Housing and Transportation Element Updates • See more in case study (pg. 31-48)
San Rafael	58,704	<ul style="list-style-type: none"> • SB 1000 Background Report • More on SB 1000 in this document (pg. 20, 38, 44)
Truckee	16,561	<ul style="list-style-type: none"> • Webpage with information on SB 1000 implementation efforts and local DACs
Ventura County	846,006	<ul style="list-style-type: none"> • General Plan Update Background Report • See Attorney General Office's letter to the County • CEJA did a SB 1000 workshop for them in 2018
West Sacramento	53,727	<ul style="list-style-type: none"> • General Plan Website • 2016 Environmental Impact Report
Woodland	60,531	<ul style="list-style-type: none"> • Updated their General Plan in 2017 • Mention EJ in their Healthy Community Element

Source: Personal Communication (2020, May 27).

Regional Background: Environmental Justice and Air Quality in the Bay Area

The San Francisco Bay Area, made up of nine counties and 101 different municipalities, is home to many environmental justice organizations, such as CEJA, People Organizing to Demand Environmental and Economic Justice (PODER), and Communities for a Better Environment (CBE) to name a few. While the Bay Area is known for its massive presence in the tech industry and for having one of the nation's most expensive real estate markets, it is also home to a number of DACs that suffer from high rates of pollution and lack of access to environmental benefits such as trees and parks. These DACs can be seen in Figure 5 below.

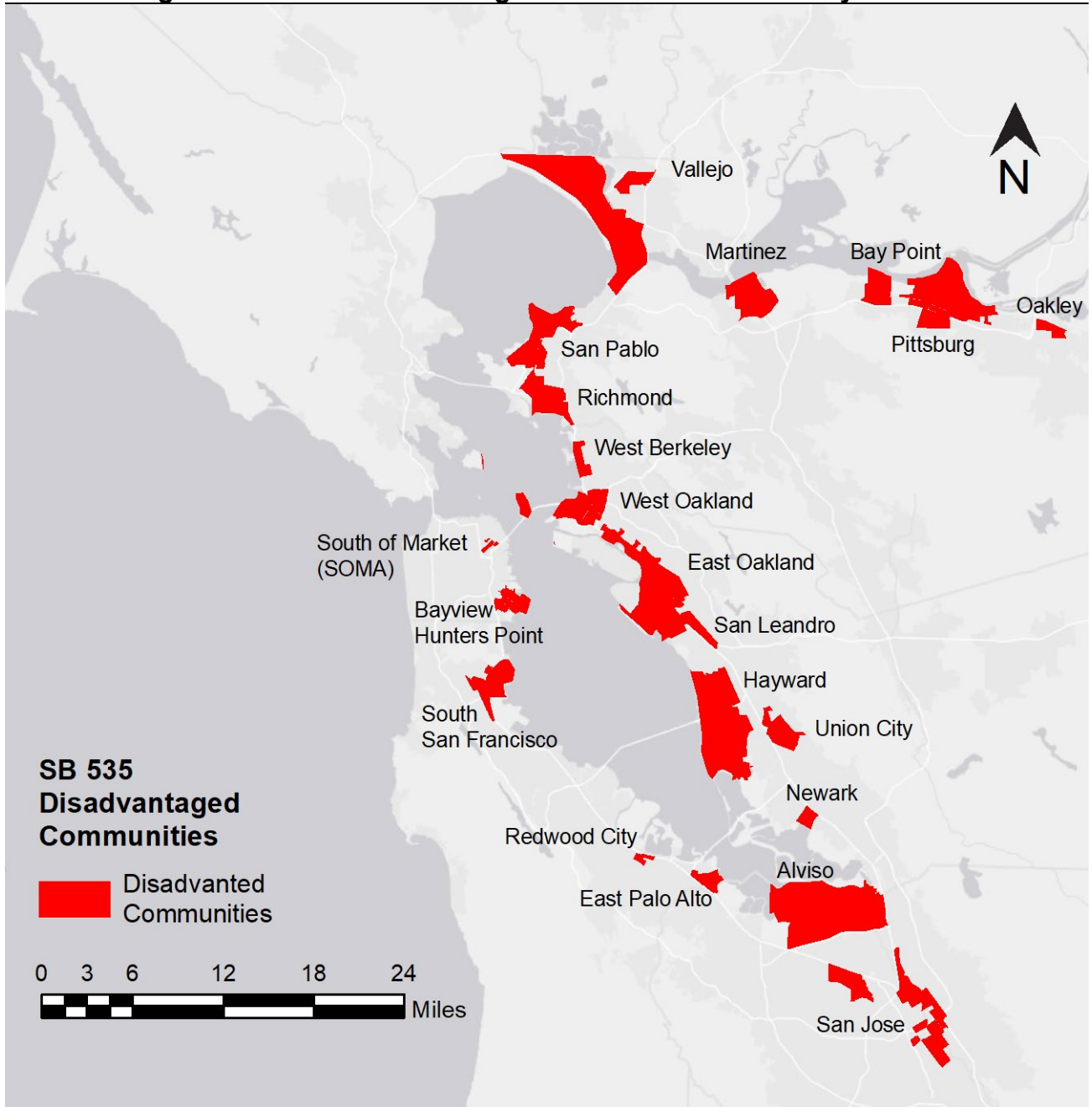
The Air District's Community Air Risk Evaluation (CARE) program provides another visual analysis (see Figure 6) of Bay Area jurisdictions that have a high pollution burden, with an emphasis on criteria air pollutants such as PM 2.5, diesel exhaust, and ozone.³⁵ Comparing the SB 535 DACs and the CARE Cumulative Impact Areas, the vast majority are located next to the San Francisco Bay waterfront and have major roadways running through or adjacent to them. Also, there is quite a bit of overlap between the SB 535 DACs and the Air District's CARE Communities. This means that many of these areas will be prioritized for multiple sources of funding as both the SB 535 and CARE programs designate funding and other resources specifically for these communities. These could be valuable sources of funding for planning departments that are gearing up to develop EJ Elements and implement EJ policies.

Air quality is a key area of focus for SB 1000, and as outlined previously, the Air District has an extensive history of working with local jurisdictions to develop effective policies. This history stems from strong community advocacy efforts that have pushed the Bay area to the forefront as a state and national leader on EJ. There are opportunities and strategies that can be used to continue this tradition. For example, a combination of the CARE program and AB 617 could be used to help jump-start SB 1000 planning efforts – especially at the critical community engagement stage, which is often one of the most difficult tasks for local planning departments. There are, for example, funding streams set-aside from AB 617 for community engagement processes. This funding includes grants of up to \$300,000 for community preparedness planning such as that carried out by the West Oakland Environmental Indicators Project (which is discussed in Oakland case study). It also provides about \$50 million for strategic incentive programs that can be used to fund the replacement of old engines and to finance other programs that reduce air pollution.³⁶

³⁵ Bay Area Air Quality Management District. (2014). Identifying Areas with Cumulative Impacts from Air Pollution in the San Francisco Bay Area (No. Version 2).

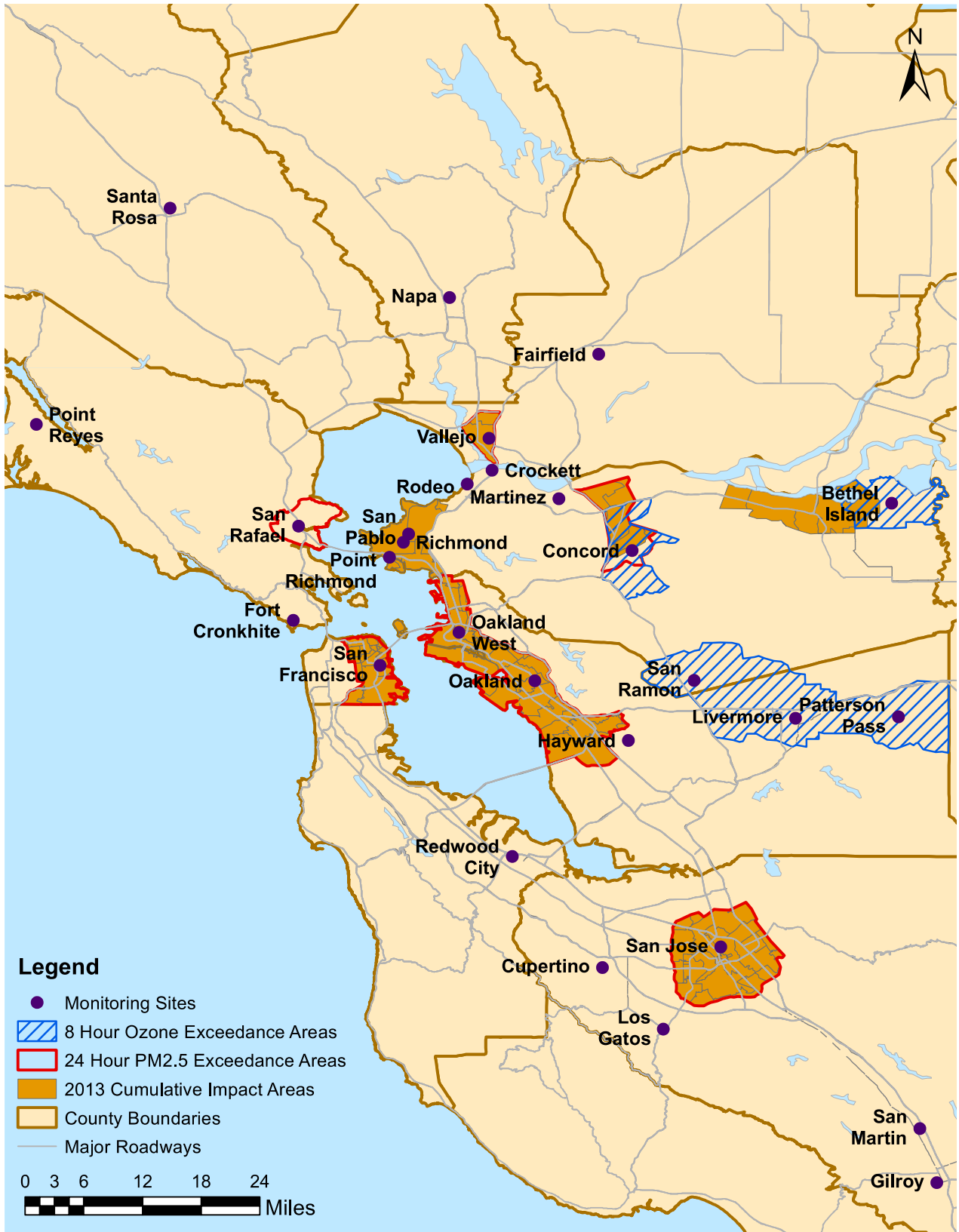
³⁶ For more information on these programs, see the Air District's Strategic Incentives Division webpage: <https://www.baaqmd.gov/funding-and-incentives>

Figure 5: SB 535 Disadvantaged Communities in the Bay Area



Source: SB 535 Disadvantaged Communities. (2018, June). Retrieved from <https://oehha.ca.gov/calenviroscreen/sb535>

Figure 6: Community Air Risk Evaluation (CARE) Cumulative Impact Areas



Source: Community Air Risk Evaluation Program, Bay Area Air Quality Management District (2018, January 25).

Recommendations for Regional Approaches to Achieve Environmental Justice

Pollution is not confined to the borders of local jurisdictions, and it is important for planners and advocates of EJ to consider regional approaches. This is especially true for widespread regional EJ issues, such as air pollution, transportation, housing, and natural resource management. **Below is a set of strategies that the Air District and local jurisdictions can use in order to incorporate regional considerations into their SB 1000 implementation efforts:**

- **Use regional rather than statewide rankings when determining DACs.** CalEnviroScreen can be used to generate regional pollution burden and vulnerability percentile rankings instead of the default statewide rankings. Regional rankings would have the benefit of identifying DACs within a region that may not be captured through statewide ranking. For example, using raw CES 3.0 data, and calculating the percentage of census tracts that ranked as DACs, only 106 out of 1,581 or 6.4% of Bay Area census tracts ranked as DACs. Whereas a regional ranking that considers the top 25 percent most disadvantaged communities in the Bay Area would include 395 census tracts rather than 106.³⁷ This could be especially true for Bay Area Ozone and Particulate Matter (PM 2.5) rankings, which rank relatively low compared to high concentrations in the Central Valley.³⁸ For example, no Bay Area Census Tract ranks above the 40th percentile for ozone or 52nd percentile for PM 2.5 when compared to census tracts across the state. Regional rankings are more relevant and useful for regional programs and funding, such as those administered by metropolitan planning organizations and the Air District.³⁹
- **For jurisdictions that have Air Quality Elements, consider prioritizing air quality-related policy updates within CARE communities** as identified by the Air District. Since the Air District has already developed relationships with many of these communities, they can help bridge the gap between local stakeholders and planning department staff. For jurisdictions that don't have an Air Quality Element, encourage them to develop one as part of their SB 1000, AB 617, and SCS implementation efforts and support them in doing so.
- **Encourage local jurisdictions to apply for Air District and other regional funding sources** to support in the implementation of EJ policies that improve air quality and help in accomplishing other relevant EJ objectives. The Air District should also partner with local jurisdictions to seek out and apply for statewide EJ, health, and climate equity funding.

³⁷ EJ Organizations such as CEJA have requested that OEHHA develop and publicize regional rankings on the CES webpage, but OEHHA has not yet developed such rankings, and responded to these requests stating, "OEHHA does not have the resources necessary to develop regional analyses that would take region-specific data into account". (Source: <https://oehha.ca.gov/media/downloads/calenviroscreen/comment/ces3responsetocomments.pdf>)

However, regional rankings can still be developed by downloading raw CES 3.0 data and determining the census tracts that rank in the top 25th percentile for a particular indicator as compared to other Bay Area census tracts rather than all California census tracts.

³⁸ Rodriguez, M., & Zeise, L. (2017). *CalEnviroScreen 3.0*. California Environmental Protection Agency, Office of Environmental Health Hazard Assessment.

³⁹ For an example of a regional ranking process, see San Diego's Climate Action Plan (pg. 39, 50): https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf

- **Foster relationships across public health departments and planning staff** in order to promote health equity and EJ throughout the Bay Area's nine counties. Establishing a region-wide network like this would enable those working on SB 1000 implementation to better understand how EJ, social and health inequities are linked, and it could enable them greater access to institutional sources of power, such as regional governmental agencies, political leaders, and corporations and businesses.⁴⁰
- **Align SB 1000 policies with Bay Area Sustainable Communities Strategies (SCS)** such that GHG emissions reductions strategies yield additional benefits for DACs, such as improved air quality and access to transit and active modes of transportation. As mentioned previously, Bay Area SCSs are part of the larger Plan Bay Area long range transportation and land use plan and identify priority development areas (PDAs) and priority conservation areas (PCAs). The prioritized areas can be used to help focus green infrastructure development in DACs, providing co-benefits that improve EJ and climate outcomes.
- **The Air District should expand its operation and visibility as an intermediary between local and state governments** as they already do directly with ongoing initiatives such as AB 617 and indirectly with Climate Action Plans. Furthermore, the Air District can directly support Bay Area local jurisdictions by assisting in their community engagement processes and packaging and circulating this report to planning departments that are preparing to implement SB 1000.

Air Pollution and Respiratory Health Data Analysis and Recommendations

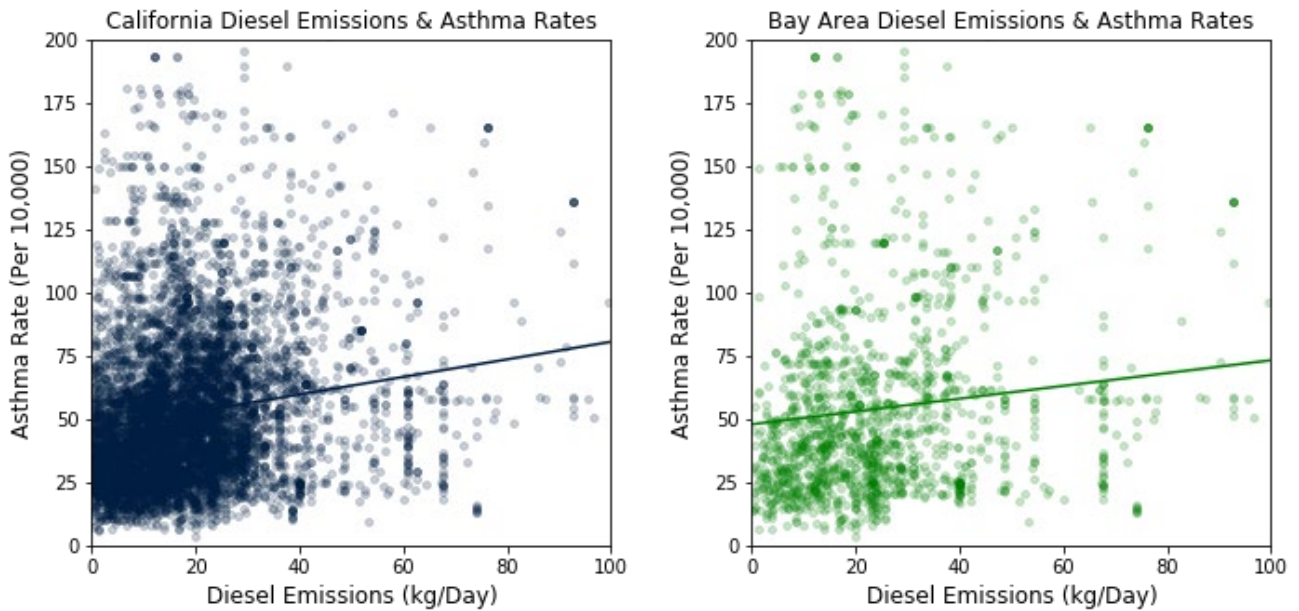
This section provides data analysis in the form of tables and graphs showing the relationship between different types of air pollution and negative respiratory health outcomes using data from CalEnviroScreen 3.0. All of the analysis below was conducted using Python.⁴¹ **Based on these findings, recommendations are provided for local jurisdictions and the Air District with guidance on best practices for addressing air pollution and negative health outcomes through planning practice.**

⁴⁰ An example of how this can be done is the Bay Area Regional Health Inequities Initiative (BARHII), which is a collaboration of public health directors, health officers, senior managers and staff from eleven of the San Francisco Bay Area local health departments. For more information see: Bay Area Regional Health Inequities Initiative. (2013). *Health Equity and Community Engagement Report*.

⁴¹ To access the Jupyter notebook used to develop this analysis, see: https://github.com/isagaillard/cp255/blob/master/IG_CP255_AssignmentFinal.ipynb

As can be seen in Figure 7, diesel air pollution is positively correlated with Asthma in both the state of California and at large and the Bay Area. The slope for the California scatter plot is .35 whereas it is .25 for the Bay Area. This means that a one kg/Day increase in diesel emissions in an average California census tract will lead to .35 additional asthma-induced emergency department (ED) visits per year per 10,000 residents. Or more optimistically, a 3 kg/Day reduction in diesel emissions would lead to approximately one less asthma-induced ED visit per year. Within the Bay Area, the correlation between diesel emissions and asthma is not quite as strong at the state level but is still notable: it would take about a four kg/Day decrease in diesel emissions in order to prevent one ED visit. **This data suggests, that targeting diesel emissions reductions would be an effective strategy at the state level and a somewhat (slightly less) effective strategy in the Bay Area.**

Figure 7: Relationship Between Diesel Emissions and Asthma

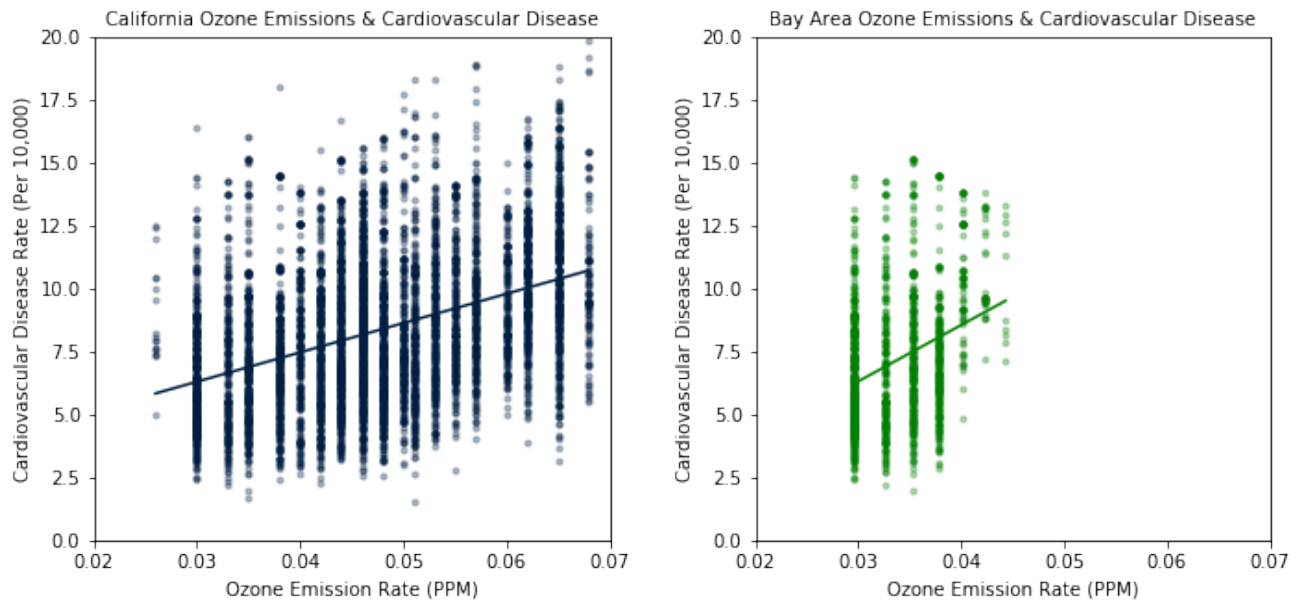


Source: CalEnviroScreen 3.0

Note: asthma rates are age-adjusted and tracked as the number of asthma-induced emergency department (ED) visits per year per 10,000 residents.

Also of interest is the correlation between ozone emissions and cardiovascular disease (heart attack-induced ED visits per 10,000 residents). In Figure 8, at the state level, the slope is 1.16 and in the Bay Area it is 2.24. This indicates a strong relationship between ozone emissions and cardiovascular disease. For example, if the Bay Area has a .01 increase in ozone in parts per million (PPM), this could lead to an increase of about 2 residents with cardiovascular disease in a given census tract, on average. At the state level, the relationship is about half as strong: a .01 PPM increase in ozone would lead to about one additional resident having cardiovascular disease. However, as can be seen in Figure 10 (Ozone Emission Rates Across Census Tracts), ozone emissions are relatively low in the Bay Area compared to the state as a whole. Therefore, trying to reduce ozone to even lower levels in the Bay Area may be more difficult because there are fewer sources to eliminate. Still, **if the objective is to reduce cardiovascular disease by mitigating one form of air pollution, ozone appears to be an important source to address.**

Figure 8: Relationship Between Ozone Emissions and Cardiovascular Disease

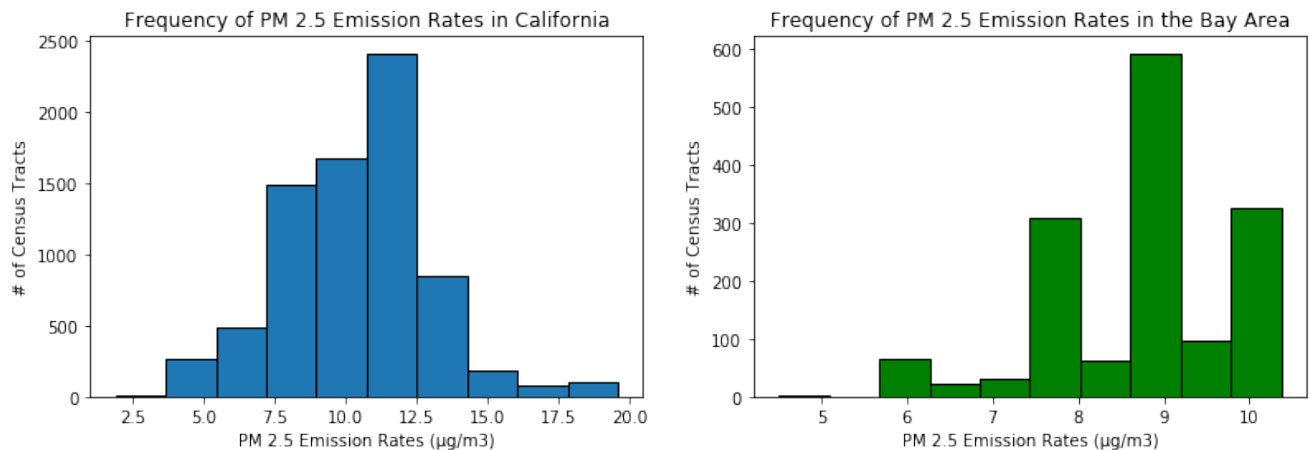


Source: CalEnviroScreen 3.0

Note: cardiovascular disease rates are age-adjusted and tracked as the number of heart attack-induced emergency department (ED) visits per year per 10,000 residents.

The following figures are graphs that show the spread of different forms of air pollution and respiratory illness across California, the Bay Area, San Francisco, and Oakland. Starting with Figure 9, similar to ozone, PM 2.5 emissions levels are much higher in the state as a whole compared to the Bay Area. Once again, this suggests that the Bay Area is doing a relatively good job of keeping air pollution levels low. However, Figure 11 shows diesel emissions, and it's clear that the Bay Area is doing relatively worse than the state in terms of this measure. San Francisco has an especially high amount of diesel emissions, with many of its census tracts having between 60-120 kg/Day of diesel emissions, whereas most of the state's census tracts have less than 40 kg/Day. This makes sense given San Francisco and Oakland's large amount of ship and rail yards, ports, and heavily traveled roadways. **In order to mitigate diesel emissions, efforts should be made to better monitor these sources of diesel pollution, and when possible incentivize the use of cleaner technologies.** Beyond directly cleaning up the sources of diesel air pollution, other strategies to promote improved air filtration include increased planting of trees and installation of HVAC systems in buildings, especially near major polluting sources.⁴²

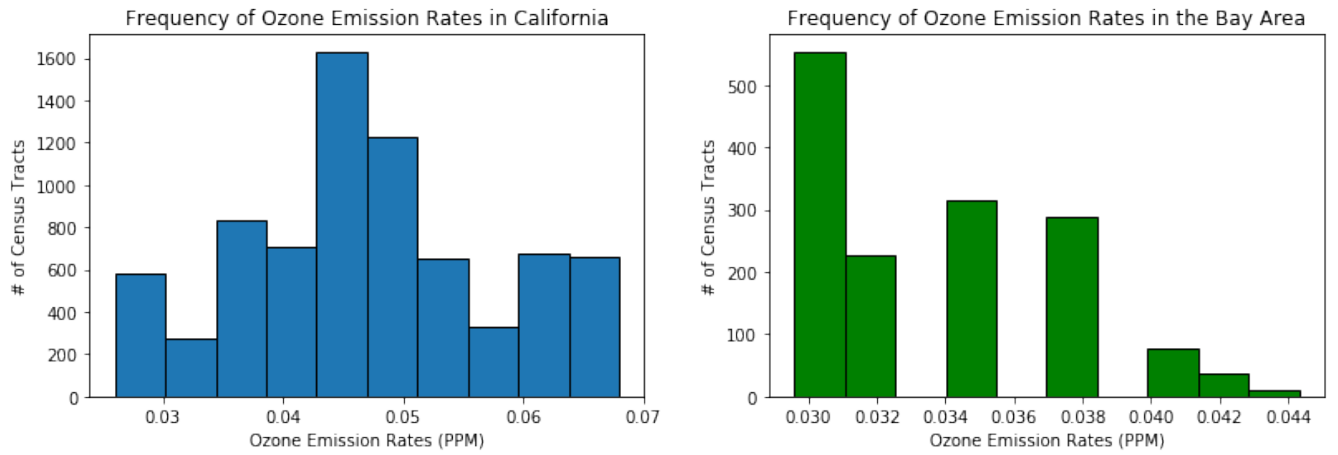
Figure 9: PM 2.5 Emission Rates Across Census Tracts



Source: CalEnviroScreen 3.0

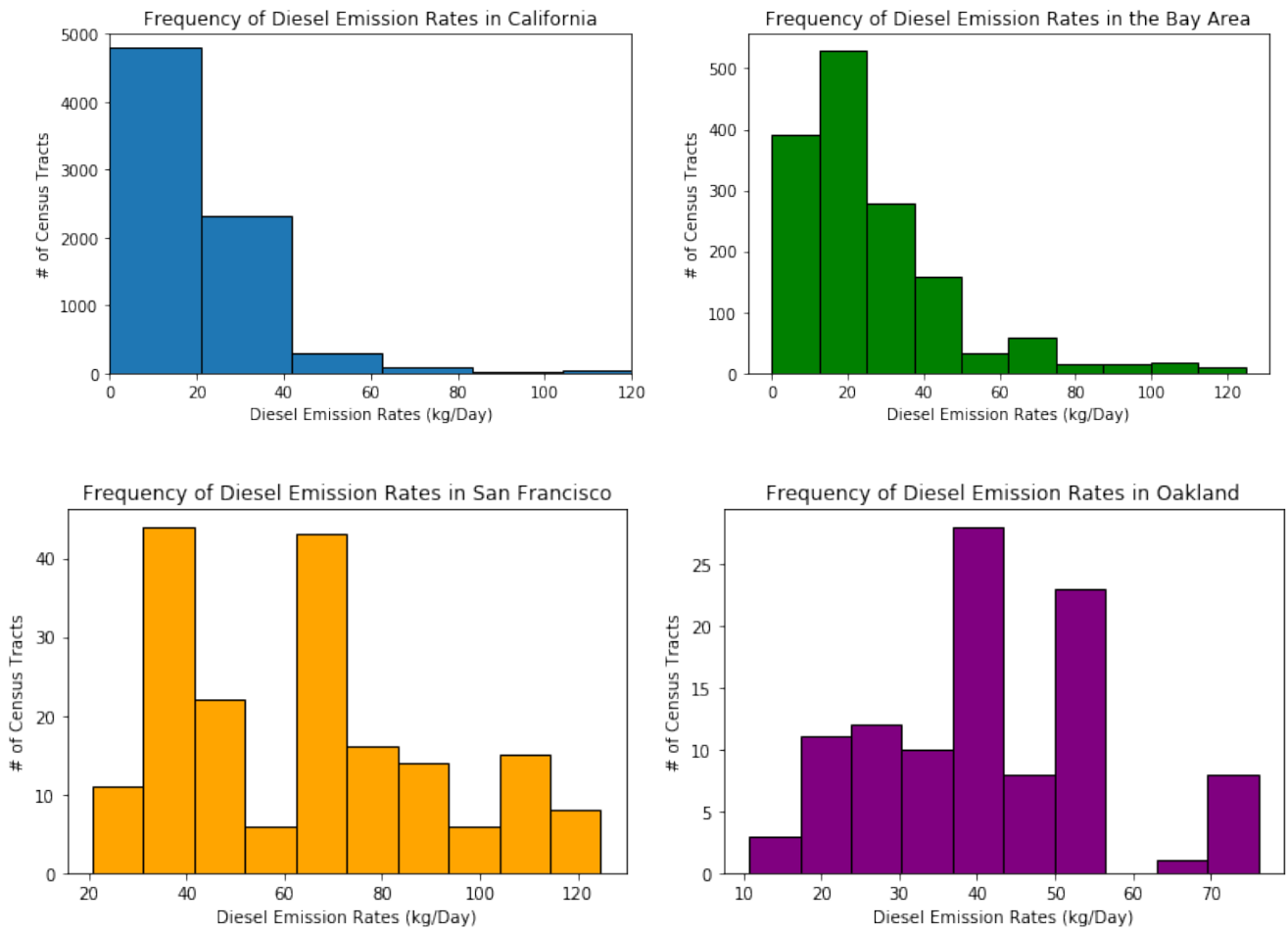
⁴² For an example of an EJ-focused HVAC installation policy, see San Francisco's Health Code Article 38: [http://library.amlegal.com/nxt/gateway.dll/California/health/article38enhancedventilationrequiredforu?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:sanfrancisco_ca](http://library.amlegal.com/nxt/gateway.dll/California/health/article38enhancedventilationrequiredforu?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca)

Figure 10: Ozone Emission Rates Across Census Tracts



Source: CalEnviroScreen 3.0

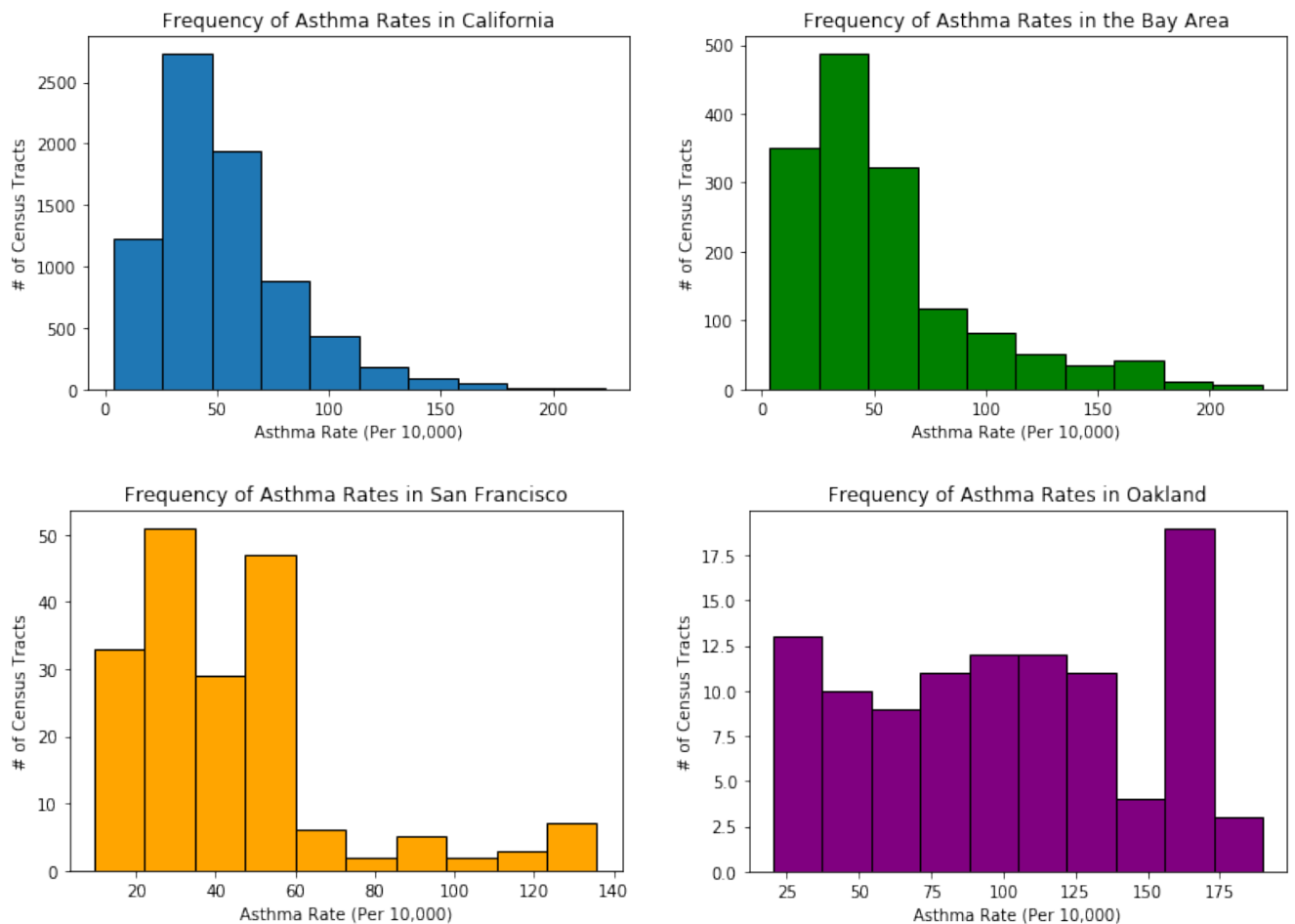
Figure 11: Diesel Emission Rates Across Census Tracts



Source: CalEnviroScreen 3.0

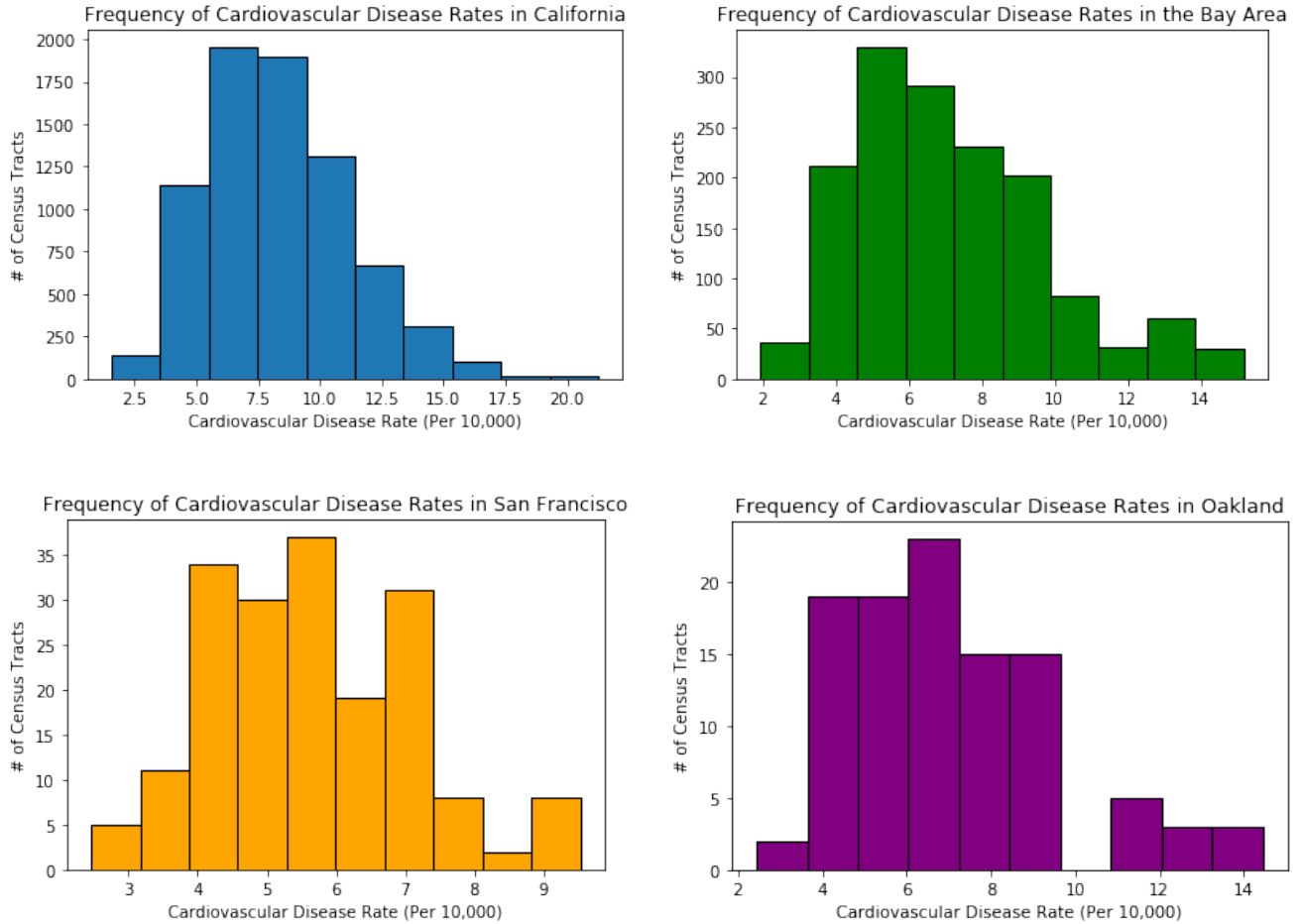
Finally, Figures 12 and 13 show a comparison of asthma and cardiovascular disease rates by census tract across the state, the Bay Area, San Francisco, and Oakland. Given the strong relationship between diesel emissions and asthma and ozone and cardiovascular disease, the relatively high rates of asthma in the Bay Area makes sense because diesel emissions are, on average, higher in the Bay Area than across the state. That said, diesel emissions are higher in San Francisco than Oakland, yet Oakland has much higher asthma rates than San Francisco, which indicates that there are a number of other variables correlated with asthma. This is a possible area for further research, but other significant variables may include income, educational attainment, race, and other environmental factors such as toxic waste and cleanup sites. Given the higher rate of asthma and cardiovascular disease in Oakland compared to San Francisco, **the Air District and other regional planning organizations should prioritize efforts to address air pollution and other respiratory illness-inducing factors in Oakland and other cities with elevated rates of illness.** The Air District's CARE Program is an important milestone, but more resources and collaboration with local businesses and government will be necessary to achieve truly equitable outcomes.

Figure 12: Asthma Rates Across Census Tracts



Source: CalEnviroScreen 3.0

Figure 13: Cardiovascular Disease Rates Across Census Tracts



Source: CalEnviroScreen 3.0

It is important to note, that despite the value that could be provided by regional collaboration and strategies, SB 1000 will ultimately be implemented at the local level, in city and county planning departments. In some cases, it will be important for the Air District and other regional agencies to play an ancillary role, providing logistical support and sharing best practices and grant funding when possible, as well as assisting in community outreach and engagement. The next section in this report includes two case studies that shed light on how local jurisdictions can prepare to implement SB 1000.

Case Studies

This section of the report explores two case studies i.e. local jurisdictions that have started or completed some aspect of the SB 1000 implementation process. It begins with the city of San Francisco and provides an in-depth analysis of the early stages of their process. The research for this case study was developed through the San Francisco Planning Department project, *Integrating Environmental Justice Policies into the General Plan* (hereafter referred to as “The Project”). The San Francisco case study provides a brief background on EJ issues in San Francisco, outlines how departments can develop a definition of EJ and develop EJ goals (beyond those required by SB 1000), and how planning staff can conduct an audit of the current General Plan to assess where EJ already exists and where it is missing. It also briefly considers how planners can incorporate EJ into neighborhood planning efforts. The second case study is the City of Oakland and includes a brief background on EJ issues in the city and then focuses on how local jurisdictions can conduct a meaningful community engagement process as part of their SB 1000 implementation. It also considers the potential for the city to build on its ongoing AB 617 efforts as part of its SB 1000 implementation process.

Case Study #1: San Francisco

Local EJ Context

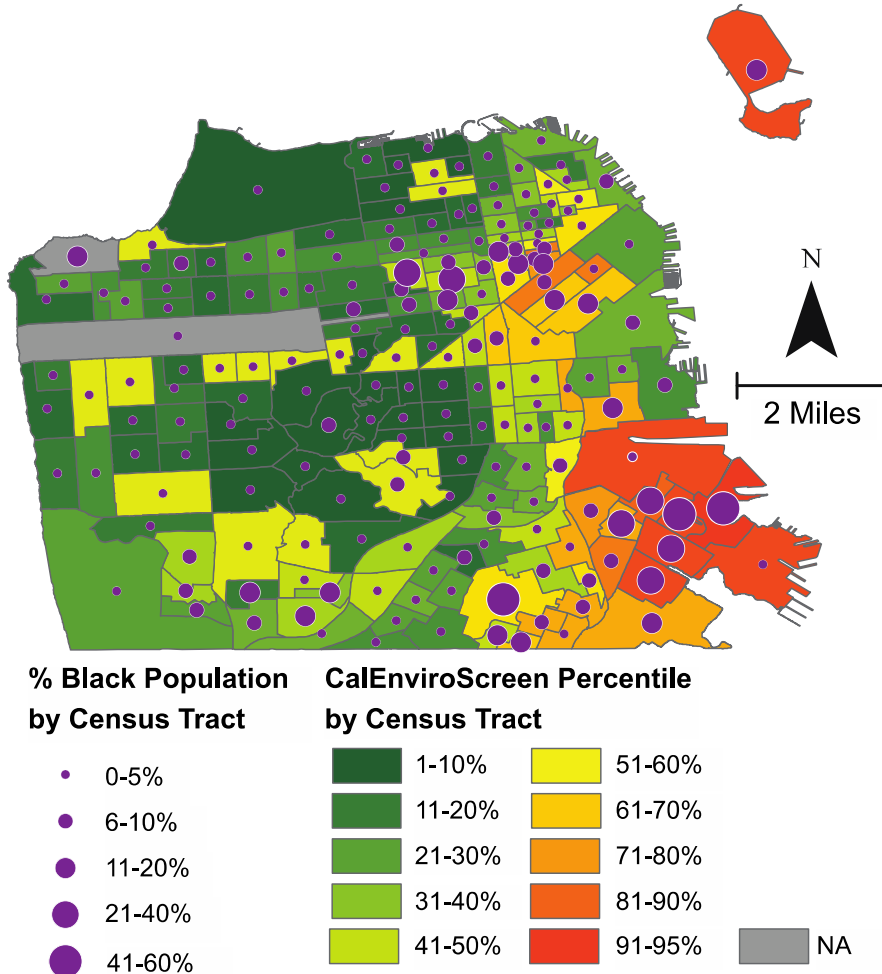
As can be seen in Figure 1, environmental justice has a long history in San Francisco. For example, freeway development in Southeast San Francisco and the practice of redlining in Western Addition, the Haight, Chinatown, parts of the Mission and other neighborhoods in the early-mid 1900s. These planning and land use practices led to major health and economic inequalities predominantly in communities of color.⁴³ Another example is the Cubic Air Ordinance of the late 1800s, which on face value, appeared to improve the living conditions of the poor, but was actually created and employed to criminalize the city’s Chinese population by fining and imprisoning thousands of Chinese residents for living in what were considered crowded quarters.⁴⁴ Each of these planning practices were designed to reinforce existing patterns of wealth, status, and power based on racial and class hierarchies that persist today.⁴⁵ As can be seen in Figure 14 below, the same areas that were redlined have higher Black populations (large purple circles) and higher CES scores (orange and red census tracts). Not only were the communities in these census tracts denied the financial resources to develop wealth due to redlining, but their neighborhoods were zoned for freeway development, toxic waste management and storage facilities, as well as other polluting land uses.

⁴³Sawyer, N. (2014, June 23). *A History of Redlining In San Francisco Neighborhoods*. Retrieved from <https://hoodline.com/2014/06/a-history-of-redlining-in-san-francisco-neighborhoods>

⁴⁴ Yang, J. S. (2009). The Anti-Chinese Cubic Air Ordinance. *American Journal of Public Health*, 99(3), 440. DOI:10.2105/ajph.2008.145813

⁴⁵ Weiss, Marc A. (1988). The Real Estate Industry and the Politics of Zoning in San Francisco, 1914-1928, *Planning Perspectives*, 3.

Figure 14: Vulnerability to Pollution and Black Population in SF Census Tracts



Source: CalEnviroScreen 3.0.

Notes: CalEnviroScreen percentiles are a cumulative measure of environmental conditions and health risk based on pollution burden and population characteristics. Percent Black Population estimates are from 2010.

Compounding these historical and ongoing injustices, there are a wide range of existing environmental conditions in San Francisco that disproportionately harm the well-being of specific neighborhoods and populations. These include the disproportionate amount of toxic waste in the Bayview and the lack of open green space in the Western South of Market (SoMa) district.⁴⁶ The compounding effect that the housing crisis has on exacerbating these inequities affects both the homeless and the home insecure. For example, City environmental health inspectors have found that many tenants are reluctant to complain to landlords about physically unsafe conditions due to fear that they will be evicted and unable to find other affordable housing in San Francisco.⁴⁷ If people are unable to secure safe and sanitary housing they are more

⁴⁶ Western SoMa Citizens Planning Task Force. (2008). *Strategic Analysis Memo* (p. 6).

⁴⁷ San Francisco Indicators Project. *Housing health & safety violations*. Retrieved from <https://www.sfindicatorproject.org/indicators/view/195>

likely to suffer the negative health consequences associated with exposure to environmental risks such as toxic air pollution and contaminated drinking water.⁴⁸

In recent decades, some City of San Francisco Departments have taken steps to address EJ issues. For example, the Planning Department has partnered with EJ groups such as PODER and Greenaction to address community concerns. The San Francisco Public Utilities Commission (SFPUC) has enacted an EJ Policy and put in place a Community Benefits Program.^{49,50} Other examples include the Public Health Department's Indicators Project and the city's Office of Racial Equity.^{51,52} Additionally, the SF Public Health Department has implemented Public Health Code 31, which focuses on protecting public health and the environment at the Hunter's Point Naval Shipyard, and includes an air pollution exposure overlay as well as specific land-use and zoning conditions for development.⁵³ Furthermore, regional agencies have made efforts to uplift DACs through projects such as the Air District's CARE Program and the San Francisco Bay Conservation Development Commission's (BCDC) EJ Plan.⁵⁴ Whether or not these many programs have been successful is largely yet to be determined. However, as the data analysis section showed, respiratory illnesses rates are lower in San Francisco than Oakland, the Bay Area, and the state as a whole, which indicates that some progress has likely been made in mitigating respiratory illness-inducing air pollutants.

Integrating Environmental Justice into San Francisco's General Plan

The following framework includes three steps that any local jurisdiction can use to begin considering how to plan for EJ. They are:

- 1. Defining EJ and SB 1000 Goals and Objectives**
- 2. Auditing the General Plan for EJ**
- 3. Planning at the Neighborhood Level: The Central Freeway**

1. EJ Charrette: Defining Environmental Justice

As a way to develop the internal knowledge and capacity necessary to begin integrating EJ into its General Plan, it was essential that Planning Department staff had a clear understanding of what EJ means. There are dozens of different definitions of EJ that have been developed by government agencies, grassroots organizations, and

⁴⁸ Krieger, J. (2002). Housing and Health: Time Again for Public Health Action. *American Journal of Public Health*, 92(5), 758–768. DOI: 10.2105/ajph.92.5.758

⁴⁹ Environmental Justice Policy. (2009, October 13). San Francisco Public Utilities Commission. Retrieved from <https://sfwater.org/modules/showdocument.aspx?documentid=3686>

⁵⁰ Community Benefits. (n.d.). Retrieved from <https://www.sfwater.org/index.aspx?page=644>

⁵¹ Environmental Health. (n.d.). Retrieved from <https://www.sfdph.org/dph/EH/PHES/PHES/sfip.asp>

*Note that the SF Indicators Project website is retired as the department is transitioning to prioritizing neighborhood level data.

⁵² Office of Racial Equity will work to repair harms from policies that previously created, upheld, or exacerbated racial disparities. (2019, October 1).

⁵³ San Francisco Board of Supervisors. Article 31: Hunters Point Shipyard (2010).

⁵⁴ Environmental Justice and Social Equity Bay Plan Amendment. Retrieved from <https://www.bcdc.ca.gov/ejwg/BPAEJSE.html>

academics. Two commonly referenced sources on EJ are the Environmental Protection Agency (EPA), and the Principles of EJ developed by the First National People of Color Environmental Leadership Summit in 1992.^{55,56} The EPA definition is more focused on laws and rule enforcement and participation, whereas grassroots definitions tend to be more encompassing, emphasizing ecological principles, toxic elimination, and equal enforcement and meaningful participation. This diversity of thought on what EJ means combined with the need to ground it in the context of the San Francisco General Plan, led to the development of a charrette (or community-input meeting) in which 10 different definitions were considered and ranked by Planning Department staff. As mentioned earlier, a major limitation of this process was the lack of community and local resident input, but the process was still helpful in developing the internal capacity of planning staff, i.e. informing them on the requirements of SB 1000 and further developing their knowledge of local EJ issues.

All department staff were invited to participate in the charrette, and approximately 25 staff (from various divisions) attended and participated in the activities, which were developed in a way that should be replicable for other planning departments. The reason for gathering feedback on definitions was to create a clear and locally relevant understanding of how EJ can be thought of and pursued by the planning department. A methodology for how the charrette was prepared and facilitated is outlined in the appendix, including a table that contains the results from the first charrette activity, in which staff were asked to rank their top definition of EJ for the planning department to utilize in its SB 1000 implementation process.

This activity was useful in that it began the process of preparing staff to think critically about what EJ means locally and within the discipline of planning. It also provided them with initial draft definitions and considerations to bring to community engagement events. **Ultimately though, community members should have the final say on how EJ is defined, as they have the most at stake.** The charrette was a starting point for staff capacity building, and community engagement is a vital next step. Ultimately, the definition will likely change after this engagement, and cities and counties should be open to this change, ensuring that the final language reflects the community's voice.

The four principles that were common in the top-ranked definitions included:

1. Ensure equitable distribution of benefits and burdens
2. Foster a holistic focus on healthy communities
3. Amend past injustices
4. Meaningfully include community voices

⁵⁵ United States, Environmental Protection Agency. *Environmental Justice*. Retrieved from <https://www.epa.gov/environmentaljustice>

⁵⁶ Principles of Environmental Justice. (1991, October 27). Retrieved from <https://www.ejnet.org/ej/principles.html>

These principles were combined and framed to be applicable to San Francisco and the Planning Department. Below is the recommended definition of EJ that came out of this process:

Environmental justice is the equitable distribution of environmental benefits and burdens to promote healthy communities where all San Franciscans have economic, civic, and recreational opportunities to thrive. These opportunities are fostered through planning decisions and processes that amend past systemic injustices while creating proactive, community-led solutions for the future.

1. (Continued) EJ Charrette: SB 1000 Goals and Objectives

As mentioned previously, SB 1000 requires jurisdictions to “develop goals and objectives to reduce the unique and compounded health risks in disadvantaged communities”. It outlines seven topic areas that all jurisdictions must include in their process, but also encourages cities to go above and beyond these and develop goals and objectives that are specific to their communities.⁵⁷ At the San Francisco charrette, this aspect of the legislation was explained to staff (see the charrette methods in the appendix), before they were asked to rank their top SB 1000 EJ goals. The results of this activity are also listed in appendix and similar to the EJ definition activity, provided staff with a greater understanding of local EJ issues, and how they intersect with the other General Plan elements. Once again, a comprehensive community engagement process should be utilized to ensure that local residents play a leading role in determining the goals and objectives that are ultimately adopted. Assuming the recommended goals that came out of the charrette are adopted and combined with the list of required goals, this would be the complete list of goals:

Reduce the unique and compounded health risks in disadvantaged communities and promote positive and equitable health outcomes for all San Franciscans by pursuing the following goals:

- 1. Reduce pollution exposure and improve air quality*
- 2. Promote public facilities*
- 3. Promote food access*
- 4. Promote safe and sanitary homes*
- 5. Promote physical activity*
- 6. Promote “civil engagement” in the public decision-making process*
- 7. Prioritize improvements and programs that address the needs of DACs*
- 8. Acknowledge and make amends for historical injustices*
- 9. Promote comprehensive climate resilience in vulnerable communities*
- 10. Promote equitable development and design*

The first goal, *Reduce pollution exposure and improve air quality* is especially important for the Air District’s work and provides an opportunity for collaboration between the Air District and Bay Area-based planning departments working on SB 1000

⁵⁷ Leyva, C. SB-1000 Land use: general plans: safety and environmental justice, Pub. L. No. 1000 (2016).

implementation. The SB 1000 Toolkit created by CEJA elaborates further on this goal, “Policies to prevent and mitigate exposure to hazardous materials and air pollution, remove and restrict toxic pollutants, and protect sensitive populations within and around disadvantaged communities. With this and goal seven i.e. *Prioritize improvements and programs that address the needs of DACs*, **the Air District should work closely with planning departments to focus their air quality planning efforts in CARE zip codes, i.e. those that rank in the top 15th percentile of the pollution-vulnerability index (PVI).**⁵⁸ Furthermore, the (recommended) ninth and tenth goals are relevant for the Air District’s Climate Planning and Strategic Incentives Divisions, since they are focused on strategies and technologies to reduce GHGs and provide funding opportunities for communities and businesses in underrepresented communities.

Integration of EJ into the General Plan

SB 1000 outlines two ways that jurisdictions can integrate EJ into their General Plans. One is to develop a stand-alone element on EJ and the other is to integrate EJ objectives and policies within each of the General Plan’s elements. The San Francisco Planning Department has decided on the latter option. There are a number of important implications associated with integrating EJ across the GP elements that are worth highlighting:

1. It allows the Department to think about the EJ implications of all of its General Plan elements, thus making its effort to uplift DACs more comprehensive.
2. It may better enable EJ policy and program development for non-General Plan-specific efforts such as climate action planning and local community health and wellness plans that aren’t housed in a General Plan.
3. It mandates that the Department engage disadvantaged communities in the process every time it updates an element, which is something that city governments have historically struggled to do.
4. Integrating across the General Plan may require a greater amount of resources, including time, staff capacity, and community input. For many local jurisdictions, these resources are in short supply, so implementing a stand-alone element may be more feasible.
5. Unless accounted for, the diffuse nature of integrating policies across elements could lead to confusion about where and how EJ is being addressed the General Plan.

One way to overcome the challenge posed by the fifth point is to develop a page in the General Plan dedicated to EJ. This page should include a history of EJ and how the department defines EJ. It should also explain in detail how the Department is going to implement SB 1000 through policy integration across each element. Finally, there should be resources related to community engagement, such as a calendar of opportunities for the public to get involved and a place to submit feedback online. These

⁵⁸ Martien, P., Fairley, D., Lau, V., Tanrikulu, S., Riviere, C., & Hilken, H. (2014). *Identifying Areas with Cumulative Impacts from Air Pollution in the San Francisco Bay Area* (No. 2) (p. 23). Bay Area Air Quality Management District.

resources will help the Department implement its community engagement strategy and are further explored in the Oakland case study of this report.

2. Auditing San Francisco's General Plan

The following section was developed by the author as part of the San Francisco Planning Department's SB 1000 project and analyzes the current state of EJ in four different components of San Francisco's General Plan: the Introduction, Air Quality, Environmental Protection, and Transportation Elements. It does so in the following ways:

- I. Outlines existing language:** both explicit and implicit inclusion of EJ-related language that currently exists in the General Plan.
- II. Highlights gaps in the General Plan:** where there are opportunities to add or improve language to reflect EJ goals and values.
- III. Provides recommendations:** of EJ language, goals, policies, and/or considerations to include in the General Plan to fill gaps, comply with and surpass SB 1000 requirements, and refine the General Plan so that it sets the standard for EJ in city planning.

For planning departments implementing SB 1000 it is advised that they conduct an audit of other General Plan Elements such as Housing, Transportation, Urban Design, and Community Safety, in addition to the Air Quality and Environmental Protection Elements. Furthermore, jurisdictions that have DACs should consider analyzing how EJ fits into their Neighborhood Specific Plans. Figure 15 summarizes the audit that was done on San Francisco's General Plan and provides recommendations for how the city can further integrate EJ.

Figure 15: General Plan Audit - Summary of Findings and Recommendations

General Plan Introduction		
Existing Language	Gaps/Opportunities to Add EJ	Recommendations
<i>State law requires that the General Plan address seven issues: land use, circulation, housing, conservation, open space, noise and safety.</i>	During the time of the project the General Plan Introduction did not include any EJ-related language. However, there were places where such language could be inserted in a concise and cohesive way.	<ul style="list-style-type: none"> Given that San Francisco has a defined DAC, include “<i>environmental justice</i>” to this list of state requirements. Develop a page in the General Plan dedicated to environmental justice: this page should include a history of EJ and how the department defines EJ. It should also explain in detail how the department is going to implement SB 1000 through policy integration across each element. Finally, there should be resources related to community engagement, such as a calendar of opportunities for the public to get involved and a place to submit feedback online. This page should be referenced in the General Plan Introduction and a link should be provided so it is easy to access.
<i>The San Francisco General Plan is designed as a guide to the attainment of the following general goals.</i>	N/A	<ul style="list-style-type: none"> Add “<i>Reduce the unique and compounded health risks in disadvantaged communities and promote positive and equitable health outcomes for all San Franciscans.</i>”
<i>The following Priority Policies are hereby established.</i>	N/A	<ul style="list-style-type: none"> Add: “<i>9. That disadvantaged communities receive an equitable share of environmental benefits and that efforts to mitigate environmental risks be prioritized in communities that face the greatest risks.</i>”
<i>The General Plan currently contains the following elements.</i>	N/A	<ul style="list-style-type: none"> After this paragraph add: “<i>Per Senate Bill 1000, Environmental Justice goals and policies will be integrated into each of the existing elements as they are updated.</i>”
<i>Additional elements may be added from time to time.</i>	N/A	<ul style="list-style-type: none"> Add: “<i>As new elements are added and existing ones updated, there will be an emphasis on meaningfully engaging disadvantaged communities in the decision-making process. Disenfranchised groups will play an important role in goal-setting, the development of strategies to accomplish goals, as well as other steps that may be necessary based on individual project timelines.</i>”

Air Quality Element		
Existing Language	Gaps/Opportunities to Add EJ	Recommendations
In the Air Quality Element's introduction there is a section on "The Need for Planning for Clean Air". It states: <i>Air Quality Standards are designed to achieve the following: to protect the most sensitive members of the population from chronic and acute health effects...</i>	Another EJ gap is that while this Element outlines specific air pollutants, it does not specify which neighborhoods and communities have been and still are subjected to the greatest amount of harm caused by these pollutants. The Air Quality Element does not explore in much depth the connection between proximity to highways and the presence of dangerously high levels of air pollution. Instead, the language focuses on how the majority of the Bay Area's air pollutants come from vehicle emissions, how this affects the region's potential growth, and how alternative modes of transportation should be encouraged. While these points are valid and should remain in the Element, the EJ section of this Element should get more specific and local in its analysis of how air pollution affects certain places and people far more than others as a result of specified causes i.e. proximity to highways/industry/etc.	<ul style="list-style-type: none"> • Adopt policies to address SB 1000 goal 1: <i>Reduce pollution exposure and improve air quality.</i> Poor air quality in San Francisco is caused by a number of different factors: mobile sources such as cars and trucks; stationary sources such as industrial facilities and power plants; and area sources such as wood burning. Poor air quality can lead to and exacerbate health issues such as asthma and cardiovascular diseases that are more likely to harm DACs.
Policies 3.7 and 4.3 call out groups that are the most susceptible to air pollution.	<p>However, these policies leave out certain DAC groups such as low income, African American residents, and other communities of color that are disproportionately exposed to air pollution's harmful health risks.</p> <p>While the Air Quality Element does reference the Air District's work on a number of occasions, there is no reference to EJ air planning efforts such as the CARE Program.</p>	<ul style="list-style-type: none"> • Ensure thorough air quality monitoring, especially in DACs, and take steps to remedy the negative health impacts and eliminate these sources of air pollution. Work with the Air District and conduct community engagement throughout this process; see the West Oakland Community Action Plan for an example of how this can be done.⁵⁹ Once air and health monitoring has happened and vulnerable communities are determined, include these neighborhoods in the Air Quality Element's language concerning "sensitive receptors".

⁵⁹ West Oakland Community Action Plan. Retrieved from <http://www.baaqmd.gov/community-health/community-health-protection-program/west-oakland-community-action-plan>

Environmental Protection Element		
Existing Language	Gaps/Opportunities to Add EJ	Recommendations & Strategies
<p>Policy 20.2 calls for the City to participate in regional agreements on a fair share allocation for future waste management facilities. Outside of Policy 20.2, there is little to zero mention of EJ. The existing language in this Element is focused on minimizing the negative impact that urbanization has on the natural environment. While there are aspects of this Element that concern the overall urban environment, it is primarily focused on protecting that which is not man-made, such as plant and animal life, undeveloped land, rivers, shoreline, and the bay. Another big concern of this Element is energy use and ensuring the promotion of renewable rather than fossil fuels.</p>	<p>Historically, San Francisco has exported its hazardous waste to other counties as it did not have areas meeting State criteria for disposal facilities. Within this policy, there is a Hazardous Waste Transfer and Storage Facility (TSF) Siting Criteria that calls for the siting of TSFs “close to waste generators 75% of which are located in southeast SF and near major highways which are easily accessed from southeast SF. While there are other components of the criteria that are justified, the requirement that TSFs get located in southeast SF, i.e. where a big portion of SF’s DAC is located is contrary to EJ.</p> <p>There are many objectives in this Element that lay a solid foundation for EJ but fail to highlight the history of health disparities associated with a lack of environmental protection in certain communities. Objectives related to the human wellbeing-natural environment connection such as toxic waste management and ensuring emergency response capability should be updated with EJ and equity in mind.</p>	<ul style="list-style-type: none"> • Adopt policies to address SB 1000 goal 1: <i>Reduce pollution exposure and improve air quality</i>. A major threat to the health of San Francisco’s population, and especially DACs is the inequitable distribution of environmental pollution as can be seen in Figure 5. Clearly the distribution of this pollution is skewed more heavily toward the Southeastern portion of the City. <p>Strategies: The “Protection of Health and Environment” section in the EP Element are a logical place to incorporate pollution data and EJ program integration, which could include:</p> <ol style="list-style-type: none"> 1. Data from the San Francisco Department of the Environment, SF Indicator Project, etc. 2. Data on brownfield sites and clean-up projects in DACs that have a disproportionate amount of contaminated sites 3. Tree planting projects that will help improve air quality, reduce GHG emissions, and reduce toxic soil contamination.

N/A	<p>The root of many environmental injustices can be traced back to planning decisions that targeted black and brown low-income communities for the siting of toxic waste producing facilities. Inevitably, waste from these facilities escapes or in some cases is intentionally released into the environment in and around these DACs.</p>	<ul style="list-style-type: none"> • Adopt a historical section and policy to address SB 1000 goal 8: <i>Acknowledge and make amends for historical injustices.</i> <p>Strategies: A policy should be created requiring the City to assess the equity implications of existing and future objectives, policies, and programs dedicated to protecting the environment. The San Francisco Department of the Environment is developing a set of guidelines and tools to accomplish this.</p>
N/A	<p>The natural environment that makes up a community can either contain threats to the people that live in or near it i.e. toxic waste and natural disasters or it can serve as a buffer to these potential dangers. The role the environment plays often depends on the relationship that people have with it. Do they pollute it with GHGs and toxic chemicals, or are they stewards to it, protecting the ecosystem and living within the natural carrying capacity? One thing is certain, the current trend that the City and broader society are on is not sustainable and will lead the environment to be a greater danger than safe haven unless drastic changes are made. DACs stand to suffer the greatest harm if sufficient measures are not taken.</p>	<ul style="list-style-type: none"> • Adopt policies to address SB 1000 goal 9: <i>Promote comprehensive climate resilience in vulnerable communities.</i> <p>Strategies: See the San Francisco Department of the Environment (SFE) page on climate reports, especially the Climate and Health Program.⁶⁰ These documents have useful data and language that can be used to develop policies for this goal which could include: Prioritization of disaster planning and infrastructure development in DACs.</p> <p>Work with the Department of Emergency Management, the American Red Cross Bay Area Chapter, and the Neighborhood Empowerment Network, among others to develop a coordinated plan in case of disaster.</p>

⁶⁰ San Francisco Climate and Health Program. Retrieved from <https://sfclimatehealth.org/>

Transportation Element		
Existing Language	Gaps/Opportunities to Add EJ	Recommendations & Strategies
<p>There are two policies that directly relate to EJ in the current Transportation Element: Policy 1.7: “Assure expanded mobility for the disadvantaged” and Policy 31.3: “Encourage equity between drivers and non-drivers”.</p>	<p>Despite the lack of EJ inclusion in the Element, there are many opportunities to improve. For example, air quality concerns related to vehicle emissions, inadequate bike infrastructure, and lack of transportation options are mentioned numerous times in the Element, however there is little to no coverage on <i>where</i> these issues are most prevalent.</p>	<ul style="list-style-type: none"> • Adopt a historical section and policy to address SB 1000 goal 8: <i>Acknowledge and make amends for historical injustices.</i> <p>Rationale: There are two primary historical injustices that have been perpetuated by the disproportionate siting of freeways in DACs. First, worsened air quality and noise pollution as well as visual blight. Second, barriers to alternative forms of mobility such as transit and bicycle-friendly infrastructure</p> <p>Strategies: Provide a detailed history of how freeway development has disproportionately harmed communities of color and explain how this injustice continues today. Call out air and noise pollution; visual blight associated with freeways. Make the connection between freeway development and lack of access to transit and other modes that are linked to upward mobility and wellbeing.</p>
<p>N/A</p>	<p>Similar to redlining, the development of the City’s I-280 freeway led to many environmental injustices in San Francisco’s once predominantly black Bayview neighborhood. In the Transportation Element, there is a historical section titled, “The Freeway Revolt and “Transit First” (1960-1989)” that could be amended to include the history of how freeway development in San Francisco has happened often at the expense of black and brown communities. This history could explain the harms this development continues to</p>	<ul style="list-style-type: none"> • Adopt an EJ Objective with policies to address SB 1000 goals 1, 2, 6, 7, and 9: <i>Reduce pollution exposure and improve air quality, Promote public facilities, Promote “civil engagement” in the public decision-making process, Prioritize improvements and programs that address the needs of DACs, and Promote comprehensive climate resilience in vulnerable communities.</i> <p>Rationale: Air pollution and lack of access to transportation options have been the major historical and ongoing injustices associated with transportation in San Francisco, especially near Highway 101 and 280. Today and going forward, a third potential injustice is being spurred on by our Country’s auto-centric transportation system: man made climate change</p>

	<p>have in DACs in the form of air and noise pollution, visual blight, and disconnection from transit, economic, and recreational opportunities.</p>	<p>induced by greenhouse gas emissions (GHGs). In California, transportation is the largest source of GHGs.⁶¹</p> <p>Strategies: This objective could expand on what Policy 1.7 currently strives for in the Element. Related to SB 1000 Goal 1, the SF Planning Department should work with the Bay Area Air Quality Management District (BAAQMD) to facilitate a process similar to the West Oakland Environmental Indicators Project in which local residents assist in the process of air quality monitoring.⁶² Once DACs with the worst air quality have been determined, the department should work with these communities to develop policies to address poor air quality caused by freeway and other forms of traffic.</p>
N/A	<p>Two new topics that will be covered in the Transportation Element are transit-oriented development (TOD) and new forms of mobility such as transportation network companies (TNCs), bike and scooter share, and electric and autonomous vehicles. Both of these topics have EJ implications and present important opportunities to ensure that the future of transportation uplifts DACs rather than further marginalizes them.</p>	<ul style="list-style-type: none"> • Related to SB 1000 goals 2, 6, 7, and 9, this objective should be adopted in a way that is synergistic with ConnectSE, which is aiming to build an effective, equitable, and sustainable transportation system for the future. Policies could include: <ol style="list-style-type: none"> 1. Expand transit coverage and connectivity in DACs that lack access 2. Provide educational outreach and Clipper Cards to low income residents 3. Expand Safe Routes to Schools programs in DAC schools 4. Protect communities of color from TNC discrimination⁶³ 5. Prioritize programs that create incentives for DACs to transition to more sustainable modes of transportation so that these communities benefit from market shifts to cleaner vehicles

⁶¹ Taylor, M. (2018). Assessing California's Climate Policies — Transportation (p. 3, Rep.). California: Legislative Analyst's Office.

⁶² Gordon, M. West Oakland Environmental Indicators Project: Citizen Engagement to Measure and Improve Air Quality. Retrieved from <https://obamawhitehouse.archives.gov/blog/2013/06/26/west-oakland-environmental-indicators-project-citizen-engagement-measure-and-improve>

⁶³ Cabansagan, C. (2017, June). *A Framework for Equity in New Mobility*. (p. 4). TransForm. Retrieved from <http://www.transformca.org/transform-report/framework-equity-new-mobility>

3. Planning for EJ at the Neighborhood Level: The Central Freeway

As evidenced by the Transportation Element analysis in the table above, San Francisco's highways are major sources of air pollution and environmental injustice. It will be important for the Planning Department to consider these impacts at the neighborhood level in order to develop locally relevant and effective planning solutions. For example, Figure 16 illustrates the fact that the neighborhoods surrounding San Francisco's Central Freeway have some of the highest pollution and health burdens in the city. The connection between toxic sites and mobile source air pollutants (caused in large part by the freeway) should be addressed directly in the Environmental Protection and Transportation Elements. However, it should also be considered in the neighborhood specific plans that the Central Freeway cuts through, including Western South of Market (SoMa), Showplace Square/Potrero, Mission, and Market Octavia.

Given the negative health and environmental impacts that San Francisco's Central Freeway has on its South of Market, Mission, and Hayes Valley neighborhoods, and the overall city's air quality, a partial or complete removal of the freeway should be considered. Figure 17 outlines the safety, sustainability, and transportation benefits that could come from a freeway removal. It also highlights ways in which uncovered streets and liberated parcels could be used for the public good. The plans shown in Figures 17 and 18 are meant to show how development could happen to uplift EJ goals if the older segment of the freeway (built in 1959 is removed and the segment renovated in 2003 is maintained and turned into an elevated park.

Figure 18 shows the potential neighborhood planning improvements that could happen at this site, if the freeway were to be removed. Of course, some of these improvements could happen without removing the freeway, however the extent to which these plans would actually lead to environmental and public health improvements would be severely limited. For example, new park land would not be as likely to attract visitors given the pollution and visible blight that would remain if the freeway were still in place. Street trees and other street improvements would be hindered because of the shadow cast by the freeway structure and traffic congestion would remain an obstacle for transit and bike infrastructure improvements. Finally, far fewer parcels would be liberated for potential affordable housing development and those currently living nearby would face continued displacement pressures, given the lack of overall affordable housing in this part of the city. It should be mentioned that this partial freeway removal scenario could lead to increased gentrification and displacement pressure too, so it would be vital to implement anti-displacement measures alongside the freeway removal, ensuring that local residents and businesses would be protected.

Figure 16: SF Central Freeway Health and Hazards Mapping

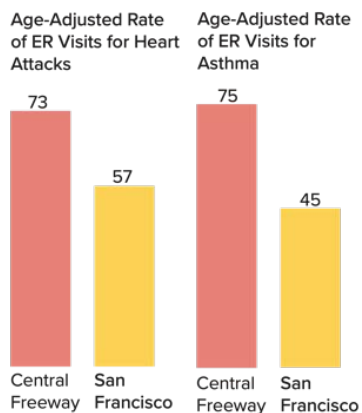
HEALTH & HAZARDS

The Central Freeway has one of the highest pollution and health burdens of any San Francisco neighborhood.

Heart attacks and asthma are correlated with exposure to air pollutants, particularly fine particulate matter from vehicle exhaust. This particulate matter, called PM2.5 for short, occurs in high concentrations near freeways.

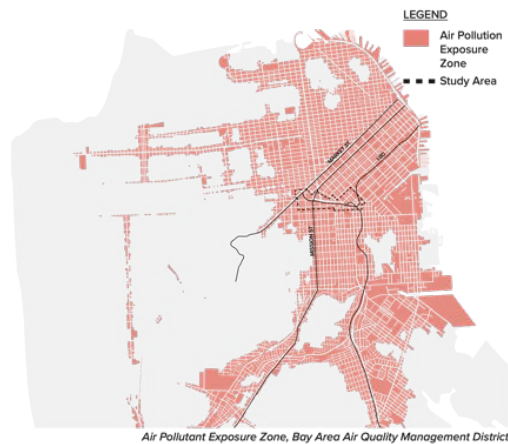
Toxic sites include 1) cleanup sites: locations contaminated with harmful chemicals that need to be cleaned up by the property owners or government; 2) hazardous sites: which store or create waste from commercial or industrial activity; and 3) groundwater threats: hazardous chemicals stored in leaking containers on land or in underground storage tanks that contaminate soil and pollute groundwater.

Pollution burden percentile shows the combined level of exposure to air, building, soil, and water pollution.

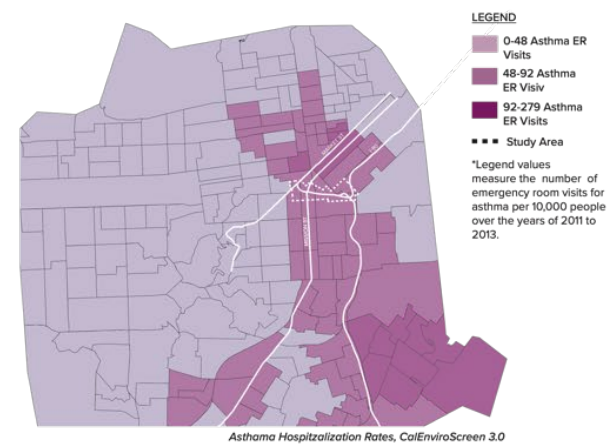


Age Adjusted Heart Attack & Asthma ER Hospitalization Rates per 10,000 population, CalEnviroScreen 3.0

ENVIRONMENTAL FACTORS



Air Pollutant Exposure Zone
 Areas in San Francisco with elevated PM2.5 and cancer risk levels from air pollution



Asthma hospitalization rates by census tract
 The study area has some of the highest rates of hospital visits due to asthma

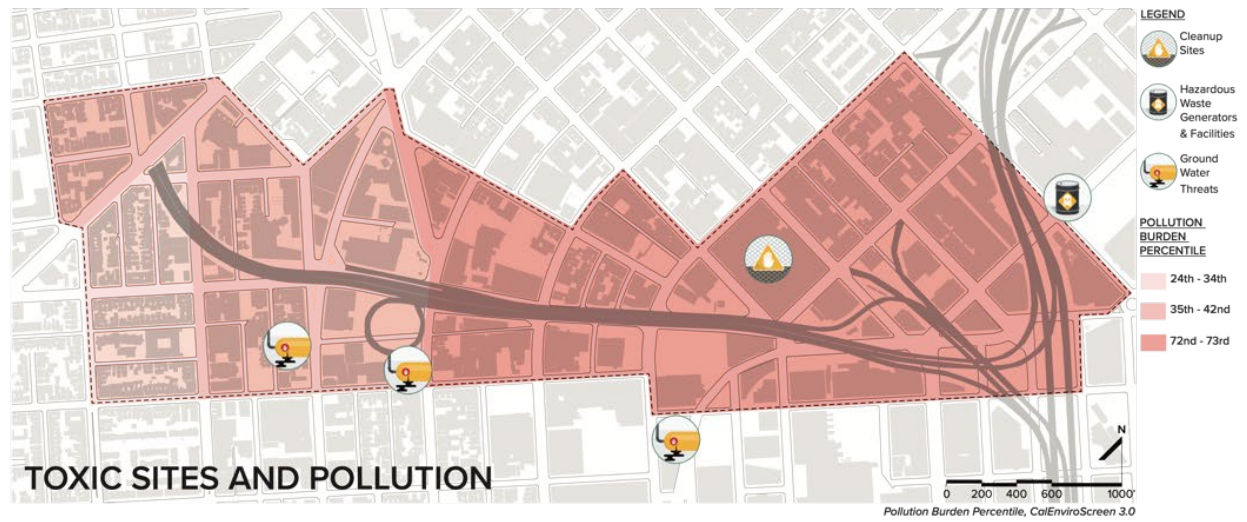


Figure 17: SF Central Freeway Partial Removal Plan Scenario

PLAN SCENARIO: A FREEWAY TAKEDOWN

REASONS TO REMOVE



Safety

- Mitigate seismic (earthquake) risk
- Reduce air pollution (pm 2.5, Ozone, etc.)
- Calm high-speed traffic (# of pedestrian fatalities at site?)



Sustainability

- Lower greenhouse gas emissions
- Promote active and public transportation
- Protect water with improved surface permeability



Connection

- Provide increased open space
- Foster diverse social & economic activities
- Prevent displacement with increased housing

FUTURE OPPORTUNITIES



Parks and other open spaces

- Develop an elevated park on the newer segment of the Central Freeway
- Turn liberated parcels into small parks and social gathering spaces



Re-configuration and greening of streets

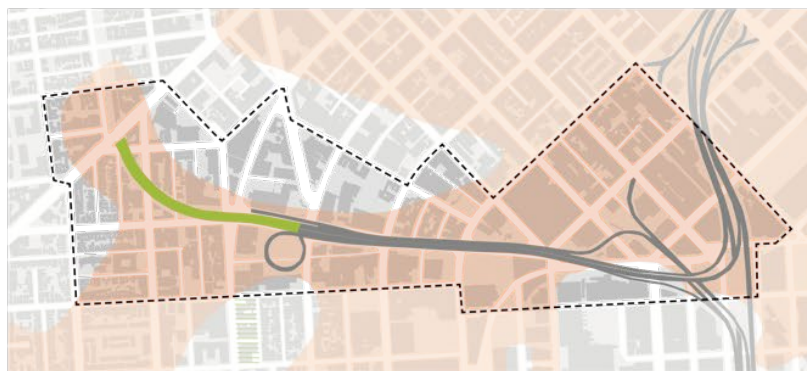
- Bring life to streets and alleyways that were once covered by the freeway
- With reduced vehicle traffic, the corridor can better accommodate other modes of travel



Affordable housing without displacement of PDR

- Liberated parcels can be used to develop affordable housing and community services
- Community Ownership and mixed-use spaces that benefit all

EXISTING CONDITIONS



LEGEND

- Study Site
- Seismic Hazard Zone
- Central Freeway & Bayshore Viaduct (Built in 1959)
- Segment of Freeway (Renovated in 2003)

REPURPOSED LAND



LEGEND

- Study Site
- Elevated Freeway Structure
- Uncovered Streets
- Liberated Parcels
- Tunneled Bayshore Viaduct

Figure 18: SF Neighborhood Improvement Mapping (Post Freeway Removal)

POTENTIAL NEIGHBORHOOD IMPROVEMENTS

HEALTH COMMUNITY CONNECTION ANTI-DISPLACEMENT

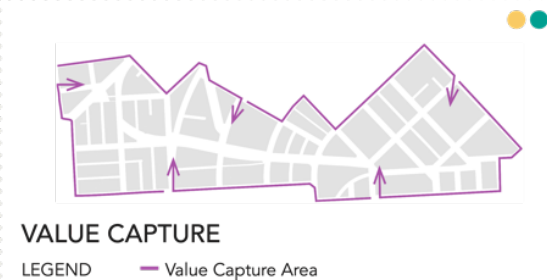
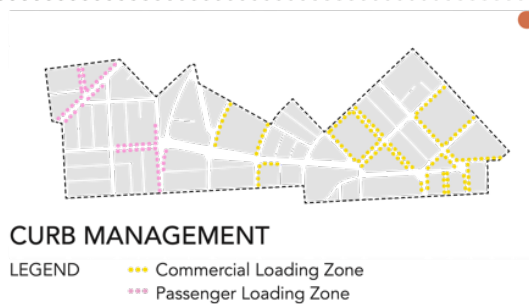
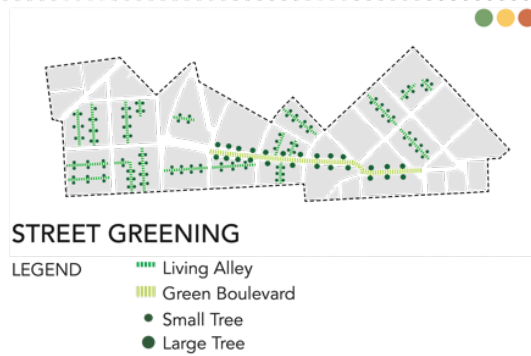
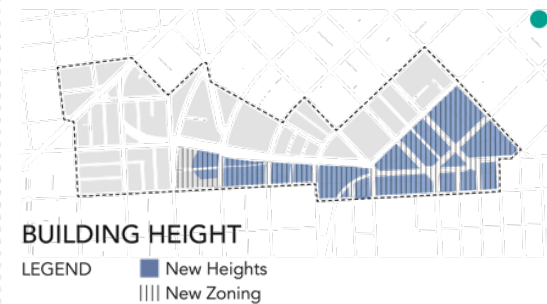
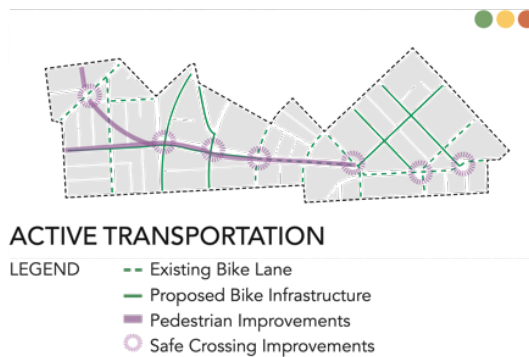
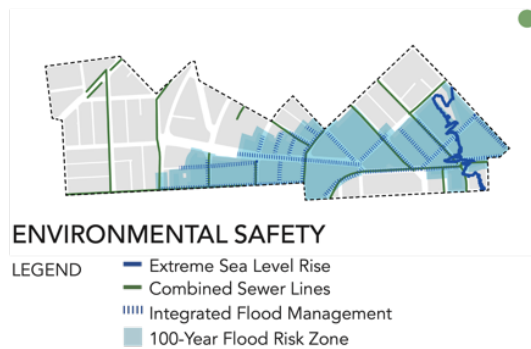
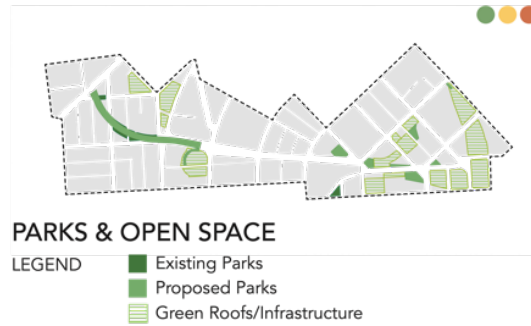


Figure 18 above includes a color-coding system in the top right, and each potential neighborhood improvement could lead to improved health, community, (transportation) connection, or anti-displacement benefits within these neighborhoods. Many of these benefits relate directly to EJ, such as increased green space, reduced environmental hazard risk, and improved public and active transportation networks. This is just one example of how the San Francisco Planning Department and other stakeholders could plan for EJ at the neighborhood level. One of the strongest arguments for this type of planning is that it not only benefits the local environment and residents, but the entire city and region, as GHG's and other forms of air pollution would be reduced, and a small but important piece of the housing crisis mitigated. It is important to note that some elevated parks such as the High Line in New York City have led to increased gentrification.⁶⁴ Therefore, a comprehensive anti-displacement plan would be vital to incorporate before, during, and after development. This plan would include job training programs, tenant protection initiatives, small business funds, and community needs assessments amongst other opportunities for public input.

Case Study #2: Oakland

While the previous case study analyzed how San Francisco has begun the process of implementing SB 1000, the following case study is focused on Oakland and its efforts to respond to strong community pushes for the last decade to incorporate specific EJ policies into its General Plan and how the City can leverage this activism in implementing SB 1000. Although Oakland's Planning Department hasn't begun implementing SB 1000 yet, it has expressed its intent and commitment to implement SB 1000 as part of its upcoming comprehensive General Plan amendment process. Over the last couple of years, the City has started working closer with many community members and organizations, the Air District, and other stakeholders to take on EJ planning issues, especially related to air quality (for example with the Healthy Development Guidelines, West Oakland Community Air Plan per AB 617 – the first action plan adopted in the State, and the East Oakland Neighborhoods Initiative). Given the high profile of EJ and health-equity issues in the City and the call for a strong EJ planning policy response, Oakland is a valuable case study to consider in terms of meaningful community engagement as part of the SB 1000 implementation process.

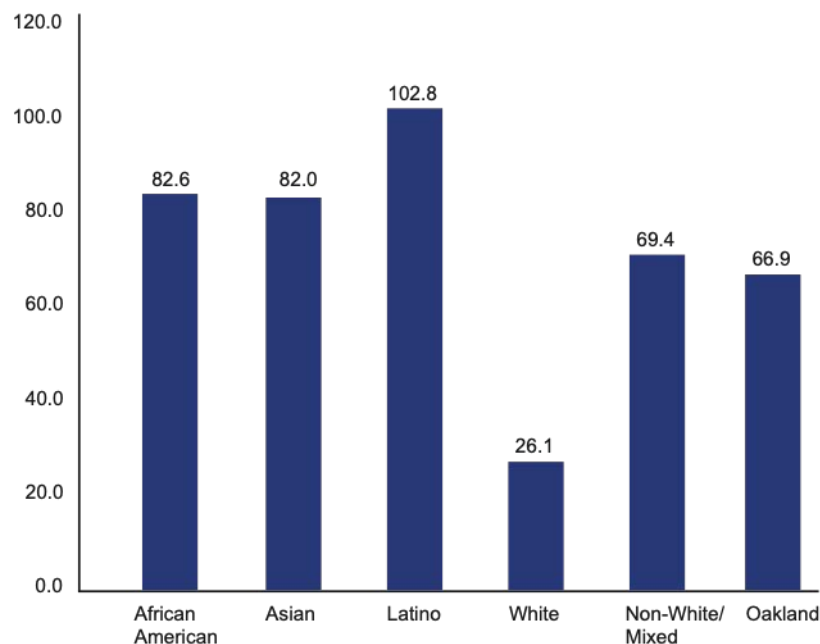
The research and key findings explored in this case study emerged from a graduate school policy report in which the primary research questions were: 1) How does California legislation define meaningful community engagement? 2) What existing partnerships and capacity has already been developed that city staff can use as part of the process? 3) What are the neighborhoods and organizations that are currently not on the department's radar or that could be further engaged to better represent all of Oakland's EJ communities? 4) How can the department develop the internal capacity necessary to conduct a robust community engagement process?

⁶⁴ Moss, J. (2012, August 21). Disney World on the Hudson. *New York Times*.

Local EJ Context:

The City of Oakland's Department of Race and Equity published a report in 2018 that highlighted glaring disparities between racial groups and neighborhoods across the city.⁶⁵ These disparities exist in a range of topics, from access to housing, transportation, and education to public and environmental health. The report also includes data about very particular issues, such as illegal dumping service request rates across racial groups (see Figure 19).⁶⁶ However, similar to San Francisco, EJ is not a new issue in Oakland. For example, freeway development and the practice of redlining in West and East Oakland (see Figure 20).^{67, 68} These processes led to major health and economic inequalities predominantly in low income communities of color that persist today.⁶⁹ Based on CES data and as can be seen in Figure 21, Oakland has some of the most pollution burdened census tracts not just in the Bay Area but in the entire state.

Figure 19: Illegal Dumping Service Request Rates by Majority Race/Ethnicity of Census Tracts in Oakland



Sources: Service requests received by the Oakland Call Center, 2017, <https://data.oaklandnet.com/Infrastructure/Service-requests-received-by-the-Oakland-Call-Cent/quthgb8e/data>; American Community Survey, 5-year estimates, 2012-2016
Note: the rates represent the number of service calls received per 1,000 people in each census tract.

⁶⁵ City of Oakland Resiliency Office, Oakland Department of Race and Equity. (n.d.). Oakland Equity Indicators. Retrieved from <http://www2.oaklandnet.com/oakca1/groups/cityadministrator/documents/report/oak071073.pdf>

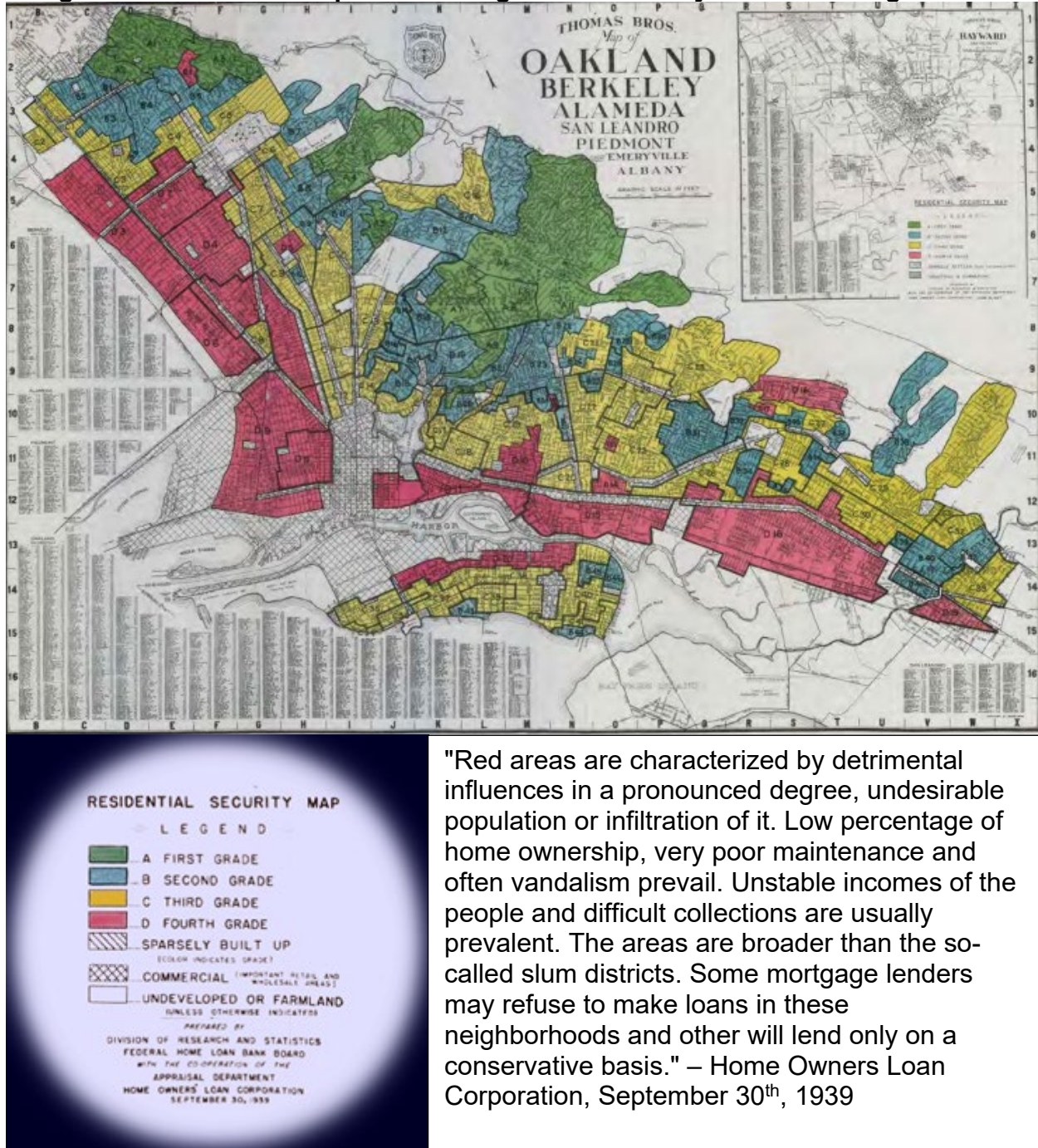
⁶⁶ Ibid, pg. 140

⁶⁷ Johnson, N. (2019, April 17). *Inside the Push to Tear Down an Oakland Freeway*. StreetsBlogSF.

⁶⁸ *Oakland Berkeley 1937*. (n.d.). Retrieved from <http://salt.umd.edu/T-RACES/mosaic.html>

⁶⁹ Johnson, M. (2017, May 12). *Undoing Oakland's History of Environmental Racism as We Address Climate Change in California*.

Figure 20: Historical Map of Redlining in the East Bay Area Including Oakland

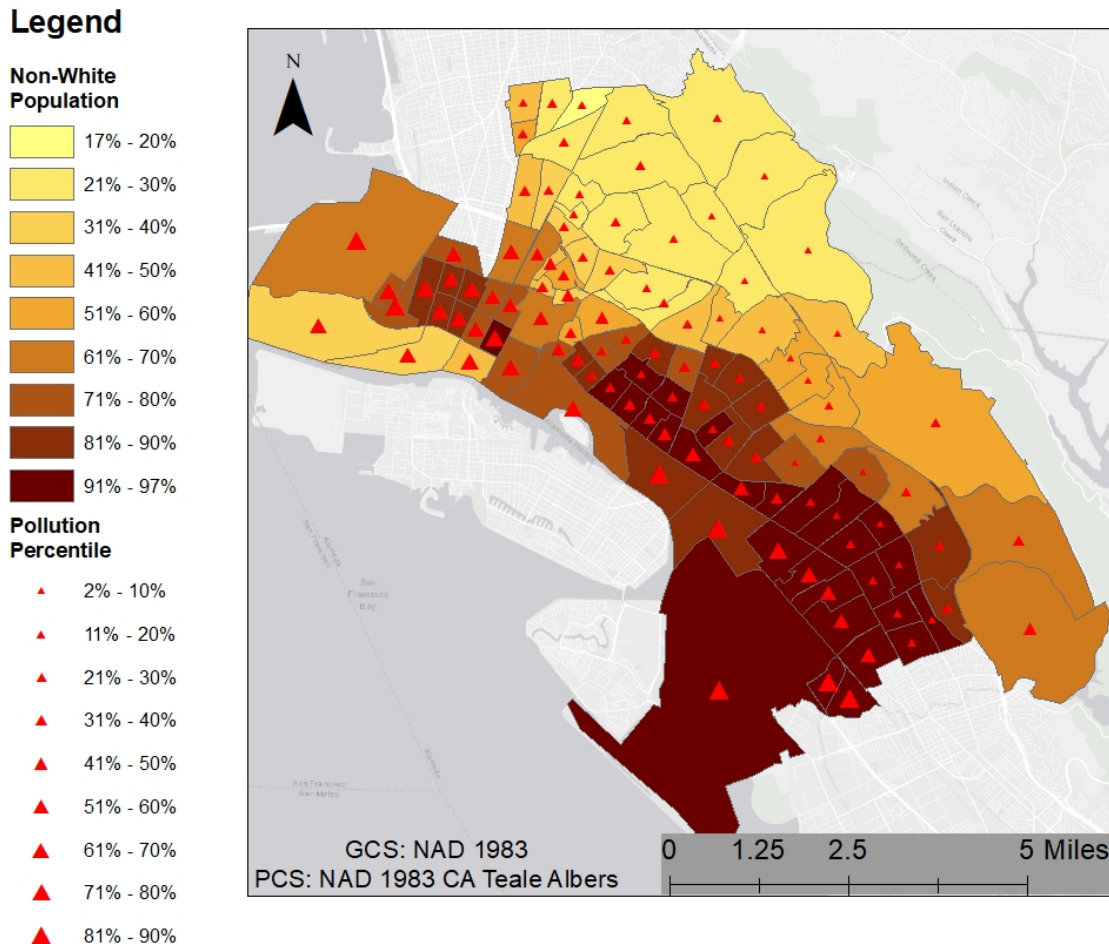


Source: Oakland Berkeley 1937. (n.d.). Retrieved from <http://salt.umd.edu/T-RACES/mosaic.html>

Along with these historical injustices, there is a wide range of existing environmental conditions in Oakland that disproportionately harm the well-being of specific neighborhoods and populations. Examples include the disproportionate amount of pollution in communities of color (see Figure 21 below) and the lack of high-quality

parcs in Council District 7.⁷⁰ The housing crisis has a compounding effect on these issues, especially for the homeless and the home insecure population.

Figure 21: Pollution Burden and Racial Breakdown in Oakland Census Tracts



Source: CalEnviroScreen 3.0

Notes: Census tract population percentiles are from 2010. Pollution Percentile is a measure of the overall pollution burden on residents as compared to residents living in other California census tracts. It includes a number of pollution indicators such as proximity to hazardous waste sites, groundwater threats, and vehicle traffic, among others.

Fortunately, Oakland has a rich history of EJ activism, and a number of local organizations have been thinking about how the city can best implement SB 1000. These organizations range from nonprofits such as CBE, CEJA, and East Oakland Building Healthy Communities (EOBHC), to partnerships such as the East Oakland Neighborhoods Initiative (EONI), a partnership between the Planning Department and twelve community-based organizations.⁷¹ Even with the networks that the planning department is already tapped into, continued funding and effort will be necessary to ensure that the community engagement and larger implementation processes are

⁷⁰ Montauk, S. (2016). 2016 Community Report Card on the State of Maintenance in Oakland Parks. Oakland Parks and Recreation Foundation.

⁷¹ East Oakland Neighborhoods Initiative. (n.d.). *EONI Community Plan* (See a full list of the EONI partners in Figure 22)

thorough and effective. The CEJA Toolkit has a section on local, regional, state, federal, and private funding sources in its SB 1000 toolkit (see footnote below).⁷²

Key Stakeholders

There are three primary stakeholder groups that will play unique yet interdependent roles if the community engagement process is going to be conducted in a meaningful way. The first group is government, especially at the regional and local level. The second is community benefit organizations (CBOs), and the third is neighborhood residents, especially in EJ communities such as West and East Oakland.

I. Government

At the local government level, clearly the Oakland Planning Department must take the lead on this effort. However, other city departments will play important roles too, such as the Oakland Department of Transportation (OakDOT), the Environmental Service Division (overseeing the Equity and Climate Action Plan), the Race and Equity Department, to name a few. Where possible, efforts should be made to create synergy between these groups and the Planning Department's community outreach processes. For example, highlighting SB 1000 at OakDOT and the Parks and Recreation Advisory Commission (PRAC) meetings as an opportunity to re-envision how the city's transportation system and parks can be used to improve the health and prosperity of Oakland's communities. At the regional level, organizations such as the Bay Conservation and Development Commission (BCDC) and the Air District can provide support on broad EJ issues, such as setting policies to improve water quality along Oakland's bayfront communities and expanding upon the resident-led air quality monitoring program developed by the West Oakland Environmental Indicators Project. The Air District can also provide support on incorporating policies and plans from the ongoing AB 617 effort in West Oakland (and soon East Oakland).

II. Community-Based Organizations (CBOs)

As mentioned in the introduction, the planning department has already done a substantial amount of outreach and work with a number of CBOs in Oakland. One partnership of particular importance is the East Oakland Neighborhoods Initiative (EONI). This partnership formed with the intention of conducting community outreach to identify the primary concerns, goals, and priorities for East Oakland residents and stakeholders.⁷³ A report was created capturing some of the key issues that these neighborhoods – some of the most severely polluted in Oakland - are facing and those related to EJ have been summarized in Figure 22 below.

⁷² California Environmental Justice Alliance. (2017 October). *SB 1000 Implementation Toolkit* (Publication). Pg. 138-151. Retrieved from: <https://caleja.org/2017/09/sb-1000-toolkit-release/>

⁷³ East Oakland Neighborhoods Initiative. (n.d.). *EONI Community Plan*

Figure 22: Summary of EJ Findings in the EONI Neighborhood Plans

Neighborhood(s)	Existing EJ Issues	EJ Priorities
Sobrante Park	<ul style="list-style-type: none"> ● Air and ground traffic ● Soil, water, and air pollution ● Neighboring liquor stores 	<ul style="list-style-type: none"> ● Enhance greenery ● Increase access to produce ● Safe, clean, well-lit streets
Stonehurst	<ul style="list-style-type: none"> ● Chemical air pollution (odor) ● Historical marginalization by planning department ● Residential displacement 	<ul style="list-style-type: none"> ● Enhance green infrastructure and parks ● Traffic calming ● Improved walkability ● Ambassador program
Brookfield/Columbia Gardens	<ul style="list-style-type: none"> ● Poor air quality (proximity to airport and other polluting industry) ● Lack of bike/pedestrian mobility ● Mega-crematorium approved despite community protest 	<ul style="list-style-type: none"> ● Land and grocery stores to grow and provide healthy food ● Enhance green infrastructure ● Address air pollution, sea level rise (flooding) and industrial dumping
Highland/Elmhurst	<ul style="list-style-type: none"> ● Air pollution ● Polluted streets ● Lack of green infrastructure 	<ul style="list-style-type: none"> ● Enhance parks and green spaces ● Improve walkability ● Access to healthy produce ● Rebuild Tassafaronga mini park
Lockwood/Coliseum/Rudsdale/Havenscourt	<ul style="list-style-type: none"> ● Polluting sites: AB&I Foundry and GE ● Illegal dumping ● Residential displacement 	<ul style="list-style-type: none"> ● Pedestrian and bike bridge over the 880 freeway ● Rezoning study to stop proliferation of polluting industry ● Community benefits agreement at Coliseum Specific Area Plan (provision of green jobs)
Melrose	<ul style="list-style-type: none"> ● Abandoned properties exacerbate illegal dumping ● Inadequate parks 	<ul style="list-style-type: none"> ● Fremont School to International Green Streets ● East Bay Greenway connector ● GE site brownfield clean up

	● Roads unsafe for pedestrians	● Community solar
Full List of EONI Partners		
1. East Oakland Building Healthy Communities	7. Communities for a Better Environment	
2. East Oakland Collective	8. Higher Ground: Neighborhood Development Corp.	
3. HOPE Collaborative	9. Local Clean Energy Alliance	
4. Oakland Climate Action Coalition	10. Repaired Nations	
5. Acta Non Verba	11. Planting Justice	
6. Dellums Institute for Sustainable Policy Studies and Actions	12. The Sobrante Park Resident Action Council	

Source: East Oakland Neighborhoods Initiative. *EONI Community Plan* pg. 25-30

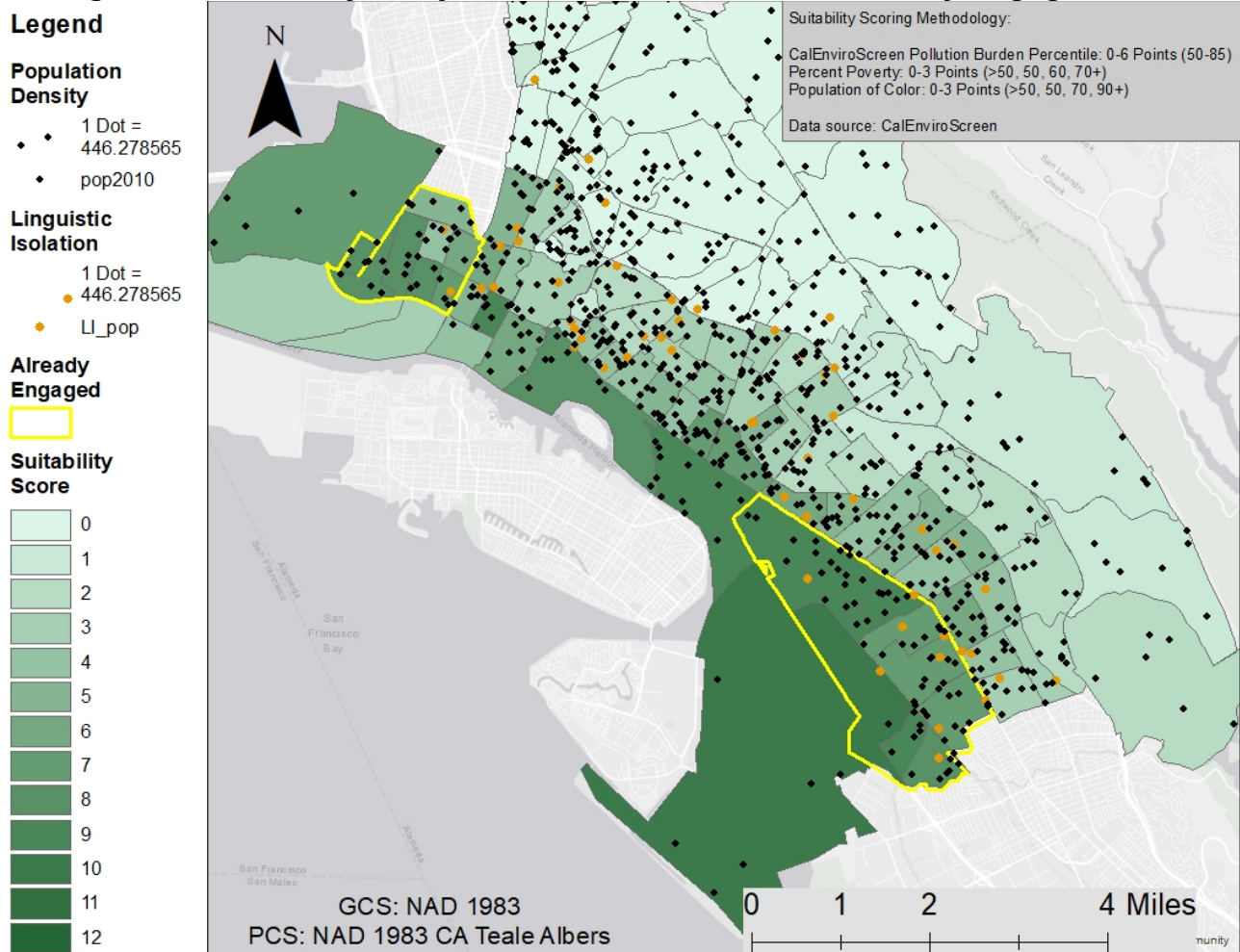
Given the extensive community engagement process that has already happened in these East Oakland neighborhoods, the planning department should build off of these findings and provide support to ensure that EONI priorities become realities. The department should incorporate community priorities into the General Plan elements and Neighborhood Specific Plans as objectives and policies. This way future planning and building decisions will be shaped, in part, by the community’s input because the General and Area Specific Plans are intended to guide the City’s growth and development. Of course, this reasoning assumes that these planning policy documents actually achieve their intended purpose, an assumption that needs to be questioned. If these documents are not actually informing decisions, then the need for staff training (discussed later) needs to be expanded beyond SB 1000 to the General and Area Plans more broadly and perhaps beyond just the Planning Department to other city staff as well. As one Planning Department staff member said, “The General Plan is only as effective as the staff that use it”.

If a similar level of outreach and planning has been conducted outside of East Oakland, the planning department should likewise build on those existing networks and resources. This will go a long way in ensuring that communities that have already invested their time and energy into the planning process feel heard. Since SB 1000 implementation will also happen at a citywide scale, community stakeholders that are already engaged should be invited to help lead the planning and facilitation of events that bring in new voices from parts of Oakland where EJ issues exist, but residents haven’t provided as much input. Residents should be compensated for the time and expertise that they contribute to this process.

III. Neighborhood Residents

As mentioned in the Introduction, one of the key challenges for the planning department will be to identify the neighborhoods and organizations that have not been as involved in EJ-related planning efforts and that could be further engaged to better represent all of Oakland’s EJ communities. To this end, Figure 23 is a suitability analysis map showing the neighborhoods in Oakland that should be prioritized for SB 1000-related outreach.

Figure 23: Suitability Analysis for Prioritization of Community Engagement



Sources: CalEnviroScreen 3.0, City of Oakland Open Data, East Oakland Neighborhoods Initiative. (n.d.). EONI Community Plan

Notes: Census tract population density is from 2010. The “Deep East Oakland” boundary is an approximation of EONI’s neighborhood map (see the EONI Community Plan pg. 5)

The above map was created using data from CalEnviroScreen, the City of Oakland’s Open Data platform, EONI’s Community Plan, and Air District staff knowledge. Each census tract was given a score from 0-12 based on three factors, with each factor contributing from 0-6 points to the tract’s total score. Census tracts with higher scores are more suitable for community engagement related to EJ and should be prioritized. The first factor was the presence of a high CalEnviroScreen Pollution

Percentile. Pollution Percentile is a measure of the overall pollution burden on residents as compared to residents living in other California census tracts. It includes a number of pollution indicators such as proximity to hazardous waste sites, groundwater threats, and vehicle traffic, among others. Census tracts in at least the 40th percentile received one point, while those in the at least the 50th, 60th, 70th, 80th, or 85th percentiles received 2, 3, 4, 5, or 6 points respectively. Tracts below the 40th percentile received 0 points for this factor. The second factor was the percent poverty (or two times below the federal poverty level) in each census tract, and rates of poverty above 50, 60, and 70 percent were given scores of 1, 2, and 3 respectively, while those below 50 percent poverty received 0 points. A similar scoring methodology was used for the final factor: population of color (50, 70, 90 percent = 1, 2, 3 points).

The reasoning for this scoring methodology is that the pollution burden factor combines many different environmental indicators and therefore receives more weight than poverty or population of color rates, which are stand-alone factors. Neighborhoods with the highest scores include all of the Deep East Oakland neighborhoods as outlined by EONI; Central Oakland neighborhoods including Kennedy, Fruitvale, St. Elizabeth, Jingletown, Embarcadero, San Antonio, Chinatown; and a number of West Oakland neighborhoods: Acorn, Prescott, Village Bottoms, and McClymonds. As can be seen outlined in yellow in the suitability map, Deep East Oakland and West Oakland are areas that warrant prioritization for outreach based on the factors included in the analysis. However, an important factor to consider is whether or not a neighborhood has already undergone a community engagement process related to EJ. In this case, both West and East Oakland have, whereas there are other high priority areas that have not. Since environmental and socioeconomic conditions are similar in these high priority areas, those that haven't already been engaged as extensively, should be prioritized.

This also makes sense in terms of acknowledging and building off of the insight that West and East Oakland residents and organizations have already contributed to the process. West and East Oakland should be at the forefront of receiving the benefits associated with SB 1000 EJ planning, but the Planning Department should not try to conduct extensive outreach to these communities. These residents have already contributed much of their valuable time and knowledge so asking them to commit even more to the process could lead to "engagement fatigue," a scenario in which community members may lose interest, or worse, become opposed to the efforts of the Planning Department. Instead, the Planning Department should tap into the community leaders and existing knowledge within the neighborhoods that have already been engaged, and focus funding, policy, and planning resources into these communities based on the priorities that they have already outlined, such as those listed in the EONI Neighborhood Plan.

Based on interviews with the Oakland Planning Department and a number of Oakland-based non-profits, it is clear that West and East Oakland are EJ hotspots, where many outreach efforts have already taken place and community priorities are relatively well-documented. Rather than trying to conduct additional forms of community engagement in these communities, such as community meetings to educate and learn

about issues from the public, steps should be taken to act on the knowledge developed through prior outreach, such as investing time and resources into an environmental amenity that the community wants or needs. For those communities that have high suitability scores but have not been engaged as extensively, steps should be taken to meet with residents in these neighborhoods to develop a knowledge base and neighborhood plan similar to that created by EONI. The suitability map illustrates population and linguistic isolation based on dot density. While these factors were not included in the suitability score, communities with high populations should be prioritized to maximize impact, and plans should be made to provide translation for those with high levels of linguistic isolation.

Developing the Internal Capacity to Conduct Community Engagement

As the Planning Department prepares to build on existing work done with EJ groups and conduct additional outreach to further engage Oakland residents in the SB 1000 process, an important early step will be to educate planning staff about the legislation and establish an internal understanding about the best way to proceed with outreach and implementation. It is important to note that at this early stage of internal capacity building, nothing should be set in stone but rather viewed as a preliminary strategy to prepare department staff to effectively work with community. The reason this preliminary strategy is necessary is because of the presence of a chicken-or-egg situation in which meaningful community engagement requires that residents are involved from the beginning, however it also requires planning staff that are informed on the issues.

A staff member from an Oakland-based EJ non-profit spoke on this issue in an interview stating, “It is good for planning departments and other agencies to do their own research and background planning to have a sense of what’s happening in communities. Then it is important to engage community members at the very beginning of the process by asking them about the issues that they are facing and the solutions they want to see before sharing any ideas that the department is considering. Whenever departments have data or proposals, they should still go back and get the community’s feedback to see if there’s agreement on the data, policies, or goals, (etc.) to include in the final plans. There is a fine line between providing information to support informed decision-making and swaying the public’s opinion through the information that you share. To do this kind of work, you must have background training on how to effectively engage communities and knowledge on environmental justice issues”.

One approach that Oakland or other planning departments can take to start developing this capacity and knowledge is to conduct an internal staff charrette, similar to the way the San Francisco Planning Department did in the Staff charrette. The methods for this activity are outlined in the Appendix. Once the internal capacity has been developed, the next step is to get out into the community and meaningfully engage local residents, organizations, and stakeholders. The below section outlines four different strategies that can be used to gather community input in the SB 1000 implementation process.

Recommended Strategies for Meaningful Community Engagement

The strategies recommended below are geared towards the City of Oakland. However, many of these strategies are generalizable and could be used by any jurisdiction conducting community engagement for SB 1000.

I. Include SB 1000 in General Plan update outreach efforts

Given that the General Plan falls under the Planning Department's citywide division, staff from this division will play a leading role in implementing SB 1000 and conducting community engagement. According to one Planning Department staff member, the Citywide Division only has five staff at the moment, and there is very little capacity available at the Department to take on additional initiatives. One way to overcome this limited capacity issue is to fold SB 1000 outreach and policy development efforts into the ongoing and future General Plan updates. For example, SB 379 requires jurisdictions to update their Safety Element to incorporate climate adaptation and resilience measures (starting in 2022).⁷⁴ Staff working on the Safety Element update could team up with those working on SB 1000 implementation to create synergy and improve the efficiency of each process by tapping into each other's knowledge and outreach efforts.

II. Develop community advisory committees that reflect the local residents

It is important to develop stakeholder groups or community advisory committees that are reflective of the community of interest in terms of race, language, income, religion, and so forth. Where possible, work with partners who are already engaged with communities, they can help liaise and bring the department into existing conversations. To a certain extent the Department is already doing this with EONI and WOEIP, but there are other groups such as AYPAL: Building Asian Pacific Islander Community Power in Chinatown, the Unity Council in Fruitvale, and Churches such as Allen Temple and Acts Full Gospel that could help strengthen outreach efforts. Also, seek to build off of the on-going and planned community engagement process that is funded through AB 617 via the Air District.

III. Learn from other jurisdictions and organizations

As shown in the Case Studies Summary tables, there are examples of other jurisdictions that have already completed SB 1000 implementation. Furthermore, the Office of Planning and Research has included a chapter on EJ in its General Plan Guidelines document that provides example language for policy development.⁷⁵ The new Oakland Bike Plan is another strong example of effective and meaningful community engagement that took place with the leadership of the Bicyclist & Pedestrian Advisory Commission (BPAC). Five different community organizations

⁷⁴ Jackson, H SB-379 Land Use: General Plan: Safety Element, Pub. L. No. 379 (2015).

⁷⁵ Environmental Justice Chapter - Public Comment. (2018, November 19). Office of Planning and Research.

helped develop the plan; the process enabled planners to get into the community to see existing conditions, hear community perspectives, and leverage those perspectives in the Plan.

IV. Incorporate locally relevant art and culture in the process

Beyond understanding a community's needs, it is also important to understand its culture. This can be done by having local arts and culture organizations help facilitate community engagement processes. Art plays an important role in community engagement because:

1. Art is an expression of culture and culture is an expression of values
2. Effective community engagement is about determining shared values
3. Art can also help unpack what EJ means to a community

Given the complexity and widespread nature of EJ issues in Oakland, the large amount of time it generally takes to update the General Plan, and the requirement to meaningfully engage EJ communities, SB 1000 implementation could take a number of years to do well. However, as long as a concerted effort is made to ensure that the wellbeing of EJ communities is always front and center and implementation happens in a way that is cohesive with existing elements and area plans, this long time frame should be viewed as an opportunity for success rather than as a hindrance. The purpose of the General Plan is to set the long-term vision for Oakland, and with the history of environmental injustices dating back many decades, the Planning Department can take important steps to amend these past and ongoing harms.

It may seem to some that community engagement is only one component of SB 1000 implementation, with other components including policy development, incorporation of policies and objectives into the General Plan, and enforcement of these policies and objectives. However, community input should serve as the foundation that provides the basis for many of the decisions that follow. Furthermore, community members should also play a role in the middle and later phases of implementation so that there are continued opportunities to adapt to changing conditions and best respond to new environmental challenges that arise along the way.

Conclusion

As San Francisco Planning Department Citywide Director, AnMarie Rodgers remarked, the General Plan is only as effective as the staff that are tasked with implementing, updating, and enforcing it".⁷⁶ The same can be said for SB 1000 more specifically, which is similar to a city's General Plan in that it is objective and policy-driven with a long term vision and attempts to cover a wide range of issues, from air quality and transportation access to public health equity and civic engagement. These

⁷⁶ Rodgers, A. (2019, August 2). Integrating Environmental Justice into the General Plan.

similarities combined with the multi-faceted and comprehensive nature of EJ enable SB 1000 to be a uniquely dynamic opportunity with the potential to turn planning practice into a force for EJ. However, the bill is not without its potential pitfalls such as a lack of available funding streams, and the current, largely uncoordinated legislative landscape, both of which have left communities and local governments frustrated with the prospect of having to conduct another policy implementation effort related to a bill that has little track record of yielding tangible results. The goal of this report was to shed light on both SB 1000, as well as other relevant local, regional, and statewide policies and funding sources in an effort to highlight opportunities to combine existing policy and community engagement efforts. Ideally, local jurisdictions will be able to work with regional planning agencies in order to conduct EJ planning in a way that crosses borders, acknowledges inequities across racial and geographical boundaries, and ultimately provides disadvantaged communities with the funding, resources, and support necessary to achieve true EJ.

Another major component of this report was to consider SB 1000 in relation to air pollution planning and public health equity efforts that are being coordinated by the Air District, CBO's, and other local and regional organizations. The data illustrates a clear relationship between different forms of air pollution and respiratory illness. On average, census tracts with higher rates of air pollution are burdened with higher rates of asthma and cardiovascular disease. Certain Oakland census tracts have especially high pollution burden and respiratory illness rates and this report outlines a community engagement approach that could be used to prioritize these neighborhoods when developing and implementing EJ planning policy. Beyond Oakland and the Bay Area, the same positive relationship between air pollution and respiratory illness exists. The recommendations for meaningful community engagement, General Plan element updates, and strategies for regional-local partnerships and collaboration can be applied throughout the state, and in any community that strives to achieve EJ through planning practice.

Appendix

EJ Charrette Methodology:

1. Develop a proposed list of 5-10 locally relevant environmental justice (EJ) definitions for the department to consider for its SB 1000 implementation process.
 - a. The definitions can be revised versions of definitions that other organizations/agencies have developed and can come from literature review
2. Develop a list of 5 possible “additional” environmental justice goals.
 - a. The proposed additional goals can come from research done by other jurisdictions’ SB 1000 implementation process as well as from literature review.
 - b. Note that the seven goals already required by SB 1000 include:
 - i. Reduce pollution exposure and improve air quality
 - ii. Promote public facilities
 - iii. Promote food access
 - iv. Promote safe and sanitary homes
 - v. Promote physical activity
 - vi. Promote “civil engagement” in the public decision-making process
 - vii. Prioritize improvements and programs that address the needs of DACs
3. Create a short 5-10 minute presentation to provide background on SB 1000.
4. Invite planning department and other relevant city staff to attend the charrette.
5. Set up the charrette with posters that include proposed EJ definitions and goals as well as plenty of sticky notes and pens.
6. At the charrette, start by giving the background presentation on SB 1000.
7. Activity 1: Ask staff to rank their top two definitions and add a comment with one or two sentences explaining why that was a top definition.
 - a. Also ask them to suggest small edits to the definitions or entirely different definitions. Appendix Table 1 contains the results from the San Francisco Planning Department’s completion of this activity, including definitions, definition source, rank (and methodology), and the feedback provided by staff.
8. Provide staff background information on SB 1000 EJ-related goals that must be integrated into the General Plan.
 - a. Explain that SB 1000 also encourages cities to develop EJ-related goals that are relevant to their unique history and context.
9. Activity 2: Ask staff to review the five proposed “additional” goals and rank/comment/suggest addition(s) as was done for the EJ definitions.
 - a. Appendix table 2 contains the results from this activity in San Francisco, including recommended goals, rationale, strategies and examples, rank, and other feedback provided by staff.

**Figure 24: SF Planning Charrette –
Proposed Environmental Justice Definitions Summary**

Definition	Source	Rank	Feedback
1) Environmental Justice can be defined as: the equitable treatment of people of all races, cultures, and incomes and the belief that no group of people should bear a disproportionate share of negative environmental consequences resulting from the operations, programs, and/or policies of the City and County of San Francisco.	SF Public Utilities Commission	#3 Total points: 29	-Should also include equitable distribution of benefits in addition to risks and negative consequences: frame positively too! -Suggested edit: "people of all races, cultures, and incomes in planning and decision making..." -Specific and focuses on disproportionate impacts.
2) Environmental Justice can be defined as: the promotion of all people's well-being regardless of race, culture, income, or any other characteristic. It is both a recognition of the direct link between economic, environmental, and health issues, and action to foster safe, sustainable, and prosperous environments where we live, work, and play. GreenAction combined with new wording	GreenAction	#4 Total points: 7	-Recognition of links to healthy communities and has a call to action. -Important that it mentions health.
3) Environmental Justice can be defined as: the basic right of all people to live, work, go to school, play, and pray in a healthy, safe, and resilient environment.	CA EJ Alliance (CEJA)	#6 Total points: 3	-PRO: It's simple, easy to understand, and still powerful CON: It doesn't include words such as race, ethnicity, etc., and I think that should be explicit.
4) Environmental Justice can be defined as: the equitable treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental and other laws, regulations, and policies affecting health and healthy communities and environments.	US EPA	#5 Total points: 5	-Addresses that EJ relates to all laws, not just environmental ones. Though should add something about addressing past injustice as well. -I couldn't decide between this and #2 but this one has meaningful involvement piece.
5) Justice can be defined as: the equitable treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental and other laws, regulations, and	Seattle Equity and Environment Initiative	#1 Total points: 42	-Addressing systemic issues and creating transformation is the only way for this to be sustained and environmental injustice to be truly uprooted.

<p>policies affecting health and healthy communities and environments.</p>			<p>-Vital to address past injustice. -Focuses not only on the negative but also the positive (recreation of EJ) -Process-oriented. -The generality of "all San Franciscans" is good.</p>
<p>6) Environmental Justice can be defined as: the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.</p>	<p>CA SB 115</p>	<p>#7 Total points: 7</p>	<p>-PRO: It's explicit that certain people should not be screwed over because of their background. CON: Could it go beyond environmental (e.g., housing, schooling, etc.)? -Like this one as well. Want to see the historic righting of wrongs and catching up the oppressed in it as well.</p>
<p>7) Environmental Justice can be defined as: the right of all people to live in a healthy and resilient environment supported by community-driven planning that fosters toxic-free housing and environments, accessible transportation, quality public services, and ample space for recreation.</p>	<p>EJ Scholar Bunyan Bryant</p>	<p>#8 Total points: 0</p>	<p>N/A</p>
<p>8) Environmental Justice can be defined as: the equitable distribution of environmental risks and benefits; fair and meaningful participation in environmental decision-making; recognition of community ways of life, local knowledge, and cultural difference; and the capability of communities and individuals to function and flourish in society.</p>	<p>Schlosberg, David. (2007) Defining Environmental Justice: Theories, Movements, and Nature</p>	<p>#2 Total points: 32</p>	<p>-Just general recognition or inclusion in decision making? -Want to see this flow better but keep the content. -Mentioning benefits and burdens and meaningful participation is critical. -Good that this focuses broadly on equitable outcomes (not just laws & policies) + the inclusive processes to get there. -Grounds 'Justice' in discussions of risks and benefits. -Good that it isn't too abstract or "wishy-washy". -Includes ways of life/culture/local knowledge suggested edit: "meaningful participation, especially of communities who have historically borne</p>

		burdens in environmental...".
<p>Methodology for definition ranking (based on SF Planning staff ranking at the charrette): -Definitions ranked #1 received 3 points -Definitions ranked #2 received 2 points -Definitions ranked #3 received 1 point</p> <p>Example: Definition 1 received 7 votes for # 1 rank and 4 votes for # 2 rank = $(7 \times 3) + (4 \times 2) = 29$ total points; Definition 2 received 1 vote for # 1 rank and 2 votes for # 2 rank = $(1 \times 3) + (2 \times 2) = 7$ total points. So Definition 1 ranked higher overall than Definition 2.</p>		
<p>Final definition recommendation: Environmental Justice is the equitable distribution of environmental benefits and burdens to promote healthy communities where all San Franciscans have economic, civic, and recreational opportunities to thrive. These opportunities are fostered through planning decisions and processes that amend past systemic injustice while creating proactive, community-led solutions for the future.</p>	<p>Rationale for the final definition recommendation: This definition pulls most of its language from the top three ranked definitions: #5, #8, and #1. It combines four principles that were common in the top-ranked definitions: 1) ensure equitable distribution of benefits and burdens, 2) amend past injustice, 3) meaningfully include community voice in decision-making, and 4) foster a holistic focus on healthy communities. Finally, it specifies the local San Francisco population and calls out the planning discipline's role in EJ.</p>	

**Figure 25: SF Planning Charrette –
Recommended Additional SB 1000 Goals and Objectives**

<p>1) Make an addition to the overarching required SB 1000 objective: <i>“Reduce the unique and compounded health risks in disadvantaged communities”</i> to incorporate the positive potential of EJ so that it reads: <i>“Reduce the unique and compounded health risks in disadvantaged communities and promote positive and equitable health outcomes for all San Franciscans”</i>.</p>	
<p>Rationale: <i>“Promote positive and equitable health outcomes”</i> was one of the top-ranked goals at the charrette, but there were some who asked what this goal would add given that public health is already implicit in some of the other goals such as food access and physical activity. By adding this component to the overarching goal, there is the benefit of including <i>“outcomes,”</i> which are measurable and can be used to track progress towards this and other EJ objectives.</p>	<p>Example: -As this is the overarching objective for SB 1000 and it includes both the mitigation of health risks and the promotion of positive and equitable health outcomes, an example of this objective is the adoption of policies and objectives into the General Plan in a way that addresses health risks and fosters healthy communities simultaneously.</p>
<p>2) Adopt additional goal: <i>Acknowledge and make amends for historical injustices.</i></p> <p>Goal Rank: #1 Total Points: 45</p>	
<p>Rationale: At the charrette, one staff member wrote, “We can only look forward if we are honest about our past. Healing racial/ethnic wounds and acknowledging past harm supports honesty and accountability”. Another staff member commented, “Often the past is overlooked in the discussion of equity, but it is integral to justice”. This additional goal enables the City to get specific about the communities of color and neighborhoods that have been marginalized and targeted for systemic forms of environmental racism.</p>	<p>Strategies: -For all elements and area plans, highlight instances when and where environmental racism occurred. Provide a detailed explanation of where it happened and the population that it affected. Then outline a plan to amend the harmed community that is developed with their consultation. -Another strategy is to develop maps of brownfield sites such as waste treatment and toxic facilities and include these in the area plans where brownfield sites are present. In places where there is a disproportionately high number of brownfields, make plans to either remediate pollution or mitigate the harmful effects it has on the local population.</p> <p>Example: -There are a disproportionately high number of toxic waste producing facilities in the Bayview neighborhood whose operations that have led to negative health outcomes, particularly in the African American community. Policies should be developed to empower this community through educational programs that explore how policy and planning decisions have threatened the health of their environment. Wherever possible, ensure that leaders from the community lead this process, and compensate locals for their expertise, time, and participation on these subjects. When objectives and policies are adopted that have particular importance in certain neighborhoods, if there are already Area Plans for these neighborhoods, the objectives and policies should also be incorporated into the corresponding Area Plans. For example, if a policy is adopted that is designed to remedy an EJ issue specific to Treasure Island, this policy should be referenced in the Treasure Island Area Plan and background information on the history of the EJ issue in Treasure Island should be provided.</p>

3) Adopt additional goal: *Promote comprehensive climate resilience in vulnerable communities.*

Goal Rank: #2
Total Points: 38

Rationale: Climate change will increasingly be felt over time and it is likely to disproportionately harm DACs that have the least ability to adapt. In this goal, “comprehensive climate resilience” means developing infrastructure to protect against natural disasters and extreme climate conditions such as flood walls and cooling centers while also addressing the drivers of climate change such as greenhouse gas emissions. This goal is synergistic with Senate Bill 379, which requires cities to include climate adaptation and resilience strategies in the Community Safety Element.⁷⁷ At the charrette, a staff member noted, “With a racial equity lens, this may be the most intersectional goal. By meeting climate resilience goals and seeking to change land uses to pollute less this goal is very cross-cutting”. Finally, this goal also accomplishes much of what the required goals leave out.

Strategies: -DACs should be prioritized in the development of SB 379 strategies, and the City should invest in multi-purpose climate-resilient infrastructure that improves and preserves the well-being of low-income communities of color both in the near- and long-term.

Examples: -Adoption of policies that lead to the construction of flood protection buffers that offer open green space in shoreline communities that are vulnerable to sea level rise and flooding.
-The building of cooling centers that can serve many community functions.

4) Adopt additional goal: *Promote equitable development and design.*

Goal Rank: #5
Total Points: 3

Rationale: While this was the lowest ranking goal, it is not covered by the other goals, whereas the public health goal was. Also, there is overlap between this goal and the economic empowerment goal in terms of strategies that can be used to achieve them. For example, a possible strategy to meet this goal is promoting partnerships with local community artists when conducting outreach for new development projects. This has the added benefit of providing economic empowerment in work that leads to more equitable and community-led development and design.

When people think about EJ, they tend to view it primarily through the lens of toxic pollution. This limited viewpoint leaves out many elements that determine whether an environment supports its people’s well-being. Imagine, for example, a street that is strewn with garbage and shattered glass yet has minimal space for pedestrians, lacks plant life, and is disconnected from public transit services. There is no mention of toxic pollution in this scene, yet the residents that have to endure this street suffer from the physical and psychological damage caused by having to inhabit it. Consider on the other hand, a street that is accessible to bikes, pedestrians, wheelchairs, and cars and is beautified

Strategies: -The Planning Department should establish policies to prioritize funding for community improvement projects such as upgrading existing parks and the building of new playgrounds in DACs that empower local residents, workers, and artists to set the vision for new developments in their communities. These policies should promote resources for the recruitment of underrepresented applicants for high-quality green jobs and the development of job training centers, free use, creative, and collaborative spaces like libraries and co-working spaces.

Examples: -With the City’s Better Roofs Ordinance, there will likely be demand for solar panel development

⁷⁷ Jackson, H. B. (2015, October 8). *Senate Bill-379 Land Use: General Plan: Safety Element*. Retrieved from https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201520160SB379

<p>with trees and locally inspired art. This street would attract economic and recreational opportunities and give its users a sense of pride and ownership thereby by promoting stewardship of it. There are too few examples of the second type of street in SF's DACs. Promoting equitable development and design is one way to remedy that problem.</p> <p>This goal speaks to the role that EJ can play in shaping a place or development physically, culturally, and financially for the benefit of a community rather than just the role it plays in resisting the harm developments may cause.</p>	<p>and installation employees.⁷⁸ The City should partner with We Work or similar businesses and provide creative spaces to empower workers and artists to develop their own visions for how their neighborhoods should be designed to look, feel, and operate.</p> <ul style="list-style-type: none"> - A policy in the Commerce and Industry Element of the General Plan that requires an analysis of the potential benefits and burdens on DACs associated with a proposed development.
<p>Other Proposed Goals (Not Included in Recommendations)</p>	
<p>Proposed Goal: Promote economic empowerment (access to high quality, safe, and green jobs)</p>	
<p>Goal Rank: #4 Total Points: 9</p>	
<p>Feedback: -Important to make explicit the leveraging of environmental improvements and investment for economic opportunities.</p>	<p>Examples: -Dedicate resources to the recruitment of underrepresented applicants for green jobs such as solar panel installation.</p> <ul style="list-style-type: none"> -Work/job training centers, but also free use/collaborative spaces like libraries and co-working spaces. Maybe the city can partner with We Work (or similar) to provide spaces/empower workers.
<p>Proposed Goal: Promote positive and equitable health outcomes</p>	
<p>Goal Rank: #3 Total Points: 25</p>	
<p>Feedback: -Great foundational subject (health) that can get at multiple other issues by addressing this one.</p> <ul style="list-style-type: none"> -What does this add since it's already explicit in some of the other goals: pollution exposure, food access, safe homes, physical activity. -This goal could be merged with the larger goal of reducing unique and compounded health risks or with the goal of promoting equitable development and design to make it more closely align with our work. -Strength is that "outcomes" can be measured. -This goal is the physical manifestation of EJ. -Health is all-encompassing, as it involves home, work, school, etc. 	<p>Examples: -Toxic release monitoring and citizen science program/partnership (WOEIP Model)</p> <ul style="list-style-type: none"> -Establish an objective and develop policies to reduce the prevalence of asthma in the Bayview African American community. -Address social determinants of health -Work with community and public health organizations to identify issues and solutions. -Explicit EJ tie to Vision Zero.
<p>Methodology for goal ranking:</p> <ul style="list-style-type: none"> -Goals ranked #1 received 3 points -Goals ranked #2 received 2 points -Goals ranked #3 received 1 point 	

⁷⁸ San Francisco Planning Department. *Better Roofs Ordinance*. (2017, January 1). Retrieved from <https://sfplanning.org/project/better-roofs>

Stakeholder Interview Guide: Integrating EJ into the General Plan

[Agency Name, Division]

[Interviewee Name and Position]

[Date, Time, and Location of Meeting]

Introduction:

- Introduction & describe the SB 1000 Project
- Purpose of interview & end product of the project
- Thank interviewee for time

Questions:

1. What are your roles and responsibilities as (insert their title)? How long have you worked in this role? With this agency?
2. How do you and or your organization define Environmental Justice?
3. How do the themes of Social Equity and Environmental Justice show up in your work?
4. When it comes to SB 1000 i.e. the process of integrating EJ into the general plan, what do you think are the most important issues, policies, and opportunities for success?
5. What are some challenges you have faced when trying to address social and racial inequity, and how have you overcome these obstacles or how do you plan to overcome them?
6. How do you engage with the community in your work? How is their input incorporated? How do you follow up with the community when the process is over?
7. What happens next in your work? Are there any upcoming opportunities or tasks that you are particularly excited about and that can be a game changer in this work?

Ending the Interview:

1. Any other feedback/thoughts to share? Anything we missed that you think we should address?
2. Any other resources or contacts you can share? Especially related to the topics we discussed today or that you think would be helpful for me in accomplishing my project goals?
3. What's the best method to ask follow-up questions?
4. Would you like to see my notes so that you can review them for accuracy?
5. Would you like to see the final outcome of the project in late August?

After every interview

Send thank you email (along with polished notes and action items, if applicable).

Key Findings from San Francisco Case Study Stakeholder Interviews

Defining Environmental Justice

Government agencies and staff tended to use EPA-style definitions while non-profits tended to use different definitions or make up their own. In some cases, a staff member's definition differed from that of their organization or agency. Two topics that were mentioned a lot when staff were asked to define EJ were redlining and historical injustices, especially in the Bayview Hunters Point community.

One interviewee commented, "When presenting on EJ to communities, it can be helpful to break down the topic into simple concepts using examples." Another mentioned that it is important to use the word "equity" rather than "fair" and for the definition to address "systemic issues" such as institutionalized racism. Another interviewee spoke about the importance of being as explicit about race as possible while complying with anti-affirmative action law Proposition 209. Finally, the definition should include a positive vision and not just acknowledge injustice.

Environmental Justice Issues in Planning

Given the wide range of stakeholders and broad nature of EJ, there were many different angles that interviewees said EJ issues show up in their work. Some of the most frequently mentioned issues were:

1. History of injustice in the Bayview community and communities of color at large
2. SFPUC's waste treatment plant in the Bayview
3. Lack of access to quality transportation and housing; for transportation there is a gap in the community's ability to access newer/tech-based modes
4. Disparities in health outcomes due to pollution (especially air quality)
5. Resiliency planning for climate change in shoreline communities
6. The cumulative impacts on communities. The Community Air Risk Evaluation (CARE) and the Government Alliance on Race & Equity (GARE) programs were mentioned a number of times in relation to air quality issues as programs that are attempting to address the cumulative impacts on communities in addition to poor air quality such as low-income socioeconomic status.

Some stakeholders felt that EJ and social justice are both similarly rooted in racism. One interviewee commented, "It is not by chance that low-income POC's live next to federal Superfund sites or routes with heavy diesel truck traffic." This interviewee went on to say that part of the reason the San Francisco Department of the Environment moved to the racial equity lens is because while they recognize burdens from pollution in their environmental analysis, this same data also emerges when they do racial equity analysis.

Here are a few findings from the SFPUC interview that are specific to utilities and EJ:

1. The PUC is responsible for water pipelines connected to homes, not in them so if there are lead issues, it is a private property issue.
2. Tap water is not a big issue in San Francisco but rather the largely isolated treatment of sewage in the Bayview (around 80% of the entire city's sewage treated there); odor is a major issue.
3. The biggest issue in San Francisco with utilities is affordability but it may be difficult to make the case that this is an EJ issue.

SB 1000 Implementation

While SF Planning staff tended to know what SB 1000 is, external partners often did not know what it was or needed a refresher. Most stakeholders were excited about the possibility of SB 1000 and spoke about issues they thought should be prioritized for implementation. **Below is a list of EJ issues that were mentioned most often for consideration in SB 1000 implementation:**

1. Health disparities across different San Francisco neighborhoods and racial groups
2. Displacement, gentrification, and affordability
3. Ensuring *meaningful* community engagement
4. Compensating trusted members of communities to support in this work
5. Ensuring that any EJ policies that are developed be based on real community needs

Some stakeholders wondered about the “teeth” of the General Plan and some asked about levers of enforceability. In the interview with the SF Planning Citywide Director, AnMarie Rodgers provided a few different answers to this question saying, “EJ policies, like all policies, are only as effective as their champions are, and often political will is essential to make changes happen.” She also shared that, “The General Plan does not just guide the Planning Department’s actions but rather the entire city’s planning decisions. Per SF Charter Section 4.105: “this Charter shall consist of goals, policies and programs for the future physical development of the City and County that take into consideration social, economic and environmental factors. If you scroll down on this page, there are sections that outline the areas that the GP has jurisdiction over, labeled as “REFERRAL OF CERTAIN MATTERS”, “PERMITS AND LICENSES”, etc.” She also highlighted the Administration Code Section 2A.53 on General Plan Referrals, which are developed by the Planning Department to determine if a proposed development, sale, land improvement, etc. conform with the General Plan.

AnMarie noted that, in practice, these are “soft” levers of enforcement that require planning staff, commission, developers, and other stakeholders to understand and act on if they are going to be effective. She mentioned an example of a stronger lever that exists within the General Plan: the Area Plans, which have implementation measures that include funding targeted for certain communities within the specified area plan.

In terms of strategies to better foster compliance and give the GP stronger levers of enforceability, AnMarie shared the following ideas:

1. Update the document to bring it up to date and increase its relevance so that people care about it
2. Develop strong understandable levers to make sure it is enforceable
3. Encourage staff to explore and use it; even those that wouldn't ordinarily in their work and not only Planning Department staff

The West Oakland Environmental Indicators Project (also connected to AB 617 funding) is a community-based environmental justice organization that provides a strong example of how the community can be involved in the planning and implementation process of EJ policy work. David Ralston is working on SB 1000 implementation at BAAQMD and he spoke about AB 617, stating, "AB 617 is a state law that focused money into community air planning and community-involved emission reduction plans". BAAQMD is using this program to do work in the Bayview.

About 19 to 21 jurisdictions in the Bay Area will be required to implement SB 1000 based on the statute i.e. if they have disadvantaged communities according to CalEnviroScreen. It could take five years to adopt an element. In response to these questions, the California Department of Justice said, "It is like CEQA: it is up to the local jurisdiction to self-identify and if there is an issue it will probably come up when there is a lawsuit, if not, there is no real enforcement.

For Native American populations and cultural-related EJ issues, the Arts Element is the most likely to get updated. According to SF Planning Archeologist and Environmental Planner, Sally Morgan, "The Historic Preservation Division does require interpretive products in their most recent mitigation strategies, so this is an issue that could be tackled in the Arts Element i.e. postage of signs that call out areas or resources of cultural significance to San Francisco's indigenous populations.

Community Engagement Principles and Strategies

It is important to develop stakeholder groups or community advisory committees that are reflective of the community of interest in terms of race, language, income, religion, etc. Where possible, work with partners who are already engaged with communities, they can help liaise and bring the department into existing conversations.

CEQA is not a good example of how to do meaningful engagement. It is very limited in the way that it works in practice; there isn't a lot of room to try new methods to solicit opinions and perspectives. Having an online comment system can be tricky if it requires a response to every single comment.

“The Spectrum of Community Engagement” tool was brought up numerous times as a great tool for understanding how to “meaningfully” engage communities.

Where rigorous scientific research is necessary such as BAAQMD’s work, there has to be a whole study design for air monitoring and other tasks, which is very involved and time intensive. This is a major challenge because communities may get impatient, so making sure to set clear expectations from the start is essential. **A similar conclusion can be drawn for SB 1000 implementation when working with communities, because element updates take a long time to prepare.**

Sacramento conducted a robust SB 1000 community engagement process (contact Remi Mendoza to learn more); San Rafael has also been implementing SB 1000 (lead contact: Barry Miller). The [Oakland Bike Plan](#) is another strong example of effective and meaningful community engagement. Five different community organizations helped develop the plan; the process required planners to get into the community to see existing conditions, hear community perspectives, and leverage those perspectives in the Plan.