

May 1st, 2019

Board of Supervisors
County of Sacramento
700 H Street
Sacramento CA 95814

**Re: Lessons Learned and Next Steps on Sacramento County Environmental Justice
General Plan Element**

Dear Supervisors,

The following comments are lessons learned and recommendations for a path forward from the Sacramento County Environmental Justice Advisory Committee. The committee was convened to provide guidance and assistance on developing an environmental justice element in the County's General Plan. The Environmental Justice Advisory Committee is comprised of representatives from the communities of active transportation, health in the built environment, environmental justice, community engagement, public health, air quality, public safety, food access, and housing and public services.

Below, you will find:

- I. Lessons learned from the environmental justice element process to date, regarding administration, accountability, and community outreach.
- II. Recommendations for immediate next steps for a phase three of the environmental justice element implementation, and a brief proposal for a countywide community engagement strategy.

Senate Bill (SB) 1000, or the "Planning for Healthy Communities Act", requires counties and cities to incorporate policies in their General Plans which address compounding environmental factors and historical disinvestment in identified disadvantaged communities. The law applies to jurisdictions containing at least one disadvantaged community. To date, the environmental justice concerns of Sacramento residents have been addressed through often one-dimensional approaches, relying on the participation of communities who believe their relationships with (and trust in) decision makers to be broken.

The intent of SB 1000 is twofold:

- I. To make a commitment to prioritizing historically disadvantaged communities through equitable partnership in future planning, development, and allocation of resources.
- II. To develop a mechanism of community engagement to bring historically disadvantaged voices to the table, not just to check a box. When implemented as

intended, SB 1000 stands to transform the process of local and regional planning in California¹.

This transformation does not come without challenge, especially since SB 1000 is an unfunded mandate. Sacramento County planners have exercised great dedication to seeing this process through to completion, displaying a commitment to personal and professional growth. Furthermore, the presence of an Environmental Justice Advisory Committee during monthly meetings with county planning staff and continual dialogue was a significant asset for transparency and accountability in SB 1000 implementation. Through this process, significant strides have been made in improving county partnerships with various community representatives and organizations such as the Black Child Legacy Campaign.

This is a big moment for Sacramento. We have the eyes and ears of the state as other jurisdictions look to our example of what can be accomplished. In order to build the communities that all residents deserve to live in requires a dedication to meet the people where they really are; to spend time learning about the context through which they see the world; to listen to communities who have been discussing these very issues for their whole lives; and to forge new partnerships that build trust through accountability. Many of the lessons learned and recommendations below are not unique to Sacramento County. Many of the same recommendations are reflected in the California Attorney General's letter to Riverside County².

I. Lessons Learned: Administration, Accountability, Community Outreach

1. Administration: Staff Time and Resources, Public Review Period

- a. The commitment of planning staff to research, outreach, and policy development related to the environmental justice element is worthy of recognition. Significant resources were committed to staff learning curves, in relation to building expertise in environmental justice and the intent of SB 1000. There was a need to contract a third-party consultant or community based organization to conduct outreach in underserved communities and draft environmental justice policies. This would ensure that trust with the community is not further fractured, and the intent of SB 1000 is met.
- b. A well-publicized public review period for the draft environmental justice element is needed.

2. Accountability: Adequate Agency Response to Community and Advisory Committee Recommendations

- a. A comprehensive outreach plan, with significant input from the Environmental Justice Advisory Committee, was needed before beginning the outreach process.

¹ For further background on SB 1000 and Sacramento County's implementation process to date, please see attachment 1

² See attachment 2 for additional context from the California Attorney General's Office

- b. County Office of Planning and Environmental Review should provide justifications for not adopting any policy proposals or recommendations made by the Environmental Justice Advisory Committee.
- c. Schedule follow up community meetings and communication which explains how community workshop and survey recommendations are being used in the general plan.

2. Community Outreach: Focus on Building Community Partnerships

- a. Advertising community workshops on Nextdoor and county web pages/listservs was not adequate. Rather, when community organizations notify their constituents on behalf of the county, trust is built and the community is better represented, as indicated by the more successful North Highlands workshop, where the organization Liberty Towers of the Black Child Legacy Campaign was a partner.
- b. Online and in person pop-up surveys were not conducted in a representative manner. Number of survey responses collected was not adequate in comparison to population of surveyed areas. Survey questions were not consistent and lacked potential to authentically capture community vision and lived experience.

II. Recommendations: Immediate Next Steps and Future Vision

Here, we provide recommendations for countywide community engagement moving forward, and our proposal for what a phase three of this process should entail. While the Community Planning Advisory Councils (CPACs) have served as a source of community input on proposed development projects in unincorporated communities, there is a need for clear vision and broader representation for their communities, beyond what a CPAC provides. This sort of vision, which would feed into community specific planning efforts, would require significant partnership and trust building with county staff and community.

1. Paving The Way for Implementation: Immediate Next Steps for a Phase Three

- a. Enact a second round of community meetings, in partnership with local community based organizations, which inform community members on how their feedback will be used and implemented in the General Plan.
- b. In partnership with community stakeholders, create a detailed implementation plan for the environmental justice element, including time bound measures for success, and continued use of the Environmental Justice Advisory Committee and

other community advisory bodies to vet policy recommendations made by county staff.

- c. Lay the groundwork for implementation of environmental justice policies through updating and developing community plans, as well as enacting specific plans along commercial corridors.
- d. Utilize an assessment of available federal, state, and regional grant funding for unincorporated communities in Sacramento County to guide continuing county-community partnership efforts, as well as community specific planning efforts.
- e. Adopt a resolution to create a countywide Community Engagement Strategy, modeled from the SACOG public participation plan.³

2. Future Vision of Community Engagement in Sacramento:

- a. Utilize yearly race and equity trainings, in partnership with organizations such as the [Government Alliance on Race and Equity \(GARE\)](#)⁴, for all elected officials, appointed officials, incumbent and incoming County planning staff, as well as staff in other County departments, such as the Department of Human Assistance, where agency operations impact disadvantaged communities.
- b. Convene a permanent community engagement advisory committee to oversee and steer future community outreach and partnership efforts of County agencies in identified environmental justice areas.
- c. Re-envision the role of CPACs, utilizing community-based organizations, to build strong community partnerships for community specific plan and environmental justice element implementation.
- d. Ensure that County agencies are allocated adequate funding for community engagement activities, and contract consultants or community based organizations to conduct outreach when the community engagement advisory committee deems it necessary.

³ https://www.sacog.org/sites/main/files/file-attachments/public_participation_plan_2013_0.pdf

⁴ <https://www.racialequityalliance.org/>

- e. Incorporate [language justice](#)⁵ and culturally appropriate outreach into all County planning efforts.
- f. Meaningfully involve youth and young leaders in all forms of community outreach, not as an afterthought or separate initiative.
- g. Increase collaboration with the outreach and planning efforts of incorporated cities, especially in disadvantaged communities

We appreciate the commitment to this process by county planning staff as well as the Board of Supervisors. We reiterate that implementing SB 1000 is an opportunity to leave a lasting legacy for Sacramento County in regards to eliminating disparate health outcomes by zip code. Community partnerships resulting from SB 1000 will make the county more competitive for state grant funding, support the revitalization of communities facing historic discrimination, and improve access to healthy foods, clean air and water, safe and affordable homes, and green spaces, thereby improving life expectancy in disadvantaged communities.

We appreciate your consideration of the comments and recommendations contained in this letter, and we look forward to further discussing them at the upcoming Board of Supervisors workshop regarding the General Plan amendment. As the primary oversight body in this implementation process, we expect a prompt and thorough response to the comments and recommendations put forth in this comment letter. Please contact Jackie Cole (jackie@vgconsulting.org) for further inquiries.

Sincerely,

Jackie Cole, Veritable Good Consulting
Spokesperson
Environmental Justice Advisory Committee

CC: Sacramento County Environmental Justice Advisory Committee Members

Kirin Kumar
Walk Sacramento

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Joanne Chan
Sacramento Metropolitan Air Quality Management District

⁵ Toolkit for Language Justice, By Communities Creating Healthy Environments. See the appendix for a table breaking down different degrees of language justice at an organizational level.
https://nesfp.org/sites/default/files/resources/language_justice_toolkit.pdf

Megan Sheffield
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Attachment 1: SB 1000 Overview and Implications for Our Region

SB 1000, the “Planning for Healthy Communities Act” was passed in 2016. It requires cities and counties in California with at least one disadvantaged community to adopt and implement General Plan policies that begin to mitigate the impacts of environmental injustice. By focusing on planning and land use to address disparate health outcomes, this bill is one of the first to address the historic disinvestment which has predominantly impacted low income communities and communities of color. These poor health outcomes can be attributed to compounding factors such as a lack of access to healthy foods, poor infrastructure, lack of access to adequate transportation, poor housing availability, lack of access to health care, proximity to pollution sources and more.

The Sacramento region, like many others across the nation, currently experiences high levels of racial disparities in health outcomes. We can determine the life expectancy of residents by zip code. Until recently, there has been an exceedingly disproportionate disparity in the infant mortality rates in historically marginalized communities, especially when compared to communities that were developed in racial covenants. Environmental justice addresses the compounding environmental factors which produce a disproportionate burden on underserved communities, thereby improving health outcomes.

Regional Implications

Recognizing the inherent value of investing in our most underserved communities, a regional shift towards equity and environmental justice has begun to take hold. The Sacramento Area Council Of Governments, Regional Transit, Sacramento Metropolitan Air Quality Management District, and the City of Sacramento are just a few regional partners who have begun to explore how to effectively make this pivot towards our future. In Sacramento county specifically, SB 1000 implementation has the potential to be a vehicle not only for strengthening community partnerships, but also in increasing competitiveness for regional and state dollars. By catalyzing relationships between public agencies, community based organizations and the communities themselves, we can improve grant award opportunities to help fund SB 1000 implementation measures. These opportunities will be bolder than ever with the release of SACOG’s 2020 MTP/SCS plan, as well as other state funding directed towards disadvantaged communities, such as the Transformative Climate Communities Grant.

SB 1000 Implementation in Sacramento County

Phase one of implementation began in October of 2017. The Office of Planning and Environmental Review convened an advisory committee and the Board of Supervisors adopted a two-phase process in May of 2018. Community groups have been engaged in parallel community engagement processes. Sacramento Area Congregations Together (Sac ACT) has proactively engaged in community outreach, including door to door canvassing in West Arden Arcade, and a successful community meeting focused on Environmental Justice in a West Arden Arcade church.

Overview of Phase One and Two

- I. Phase one was a review of the baseline data used to identify disadvantaged communities within the county and a commitment to consider how to prioritize them going forward. While the necessary focus areas of SB 1000 were included in phase one research, county planners faced a challenge in further ground-truthing their baseline data during phase two. Furthermore, phase one identified existing General Plan policies pertinent to environmental justice, many of which were not effectively being implemented⁶.
- II. Phase two began after initial adoption of phase one, in May 2018. It consisted largely of community engagement and policy development, in consultation with the EJ advisory committee. As of February 2019, phase two is scheduled for adoption in May 2019. The focus areas put forth during the county outreach process included:
 - a. Healthy Food Access
 - b. Physical Activity
 - c. Pollution Exposure
 - d. Public Facilities
 - e. Safe and Sanitary Homes
 - f. Civil Engagement
 - g. Crime Prevention
- III. Three community workshops were organized by county planning staff. They took place in West Arden Arcade, South Sacramento and North Highlands. In each of these meetings, several members of the Environmental Justice Advisory Committee were present to facilitate small group discussions related to the SB 1000 focus areas listed above. Comments made by community members were recorded and have been posted on the [county web page](#)⁷.

⁶ See Phase 1 EJ element report, which lists existing general plan policies relating to each SB 1000 focus area. <http://www.per.saccounty.net/PlansandProjectsIn-Progress/Documents/Environmental%20Justice%20Element/Phase%201%20Approval%20%28BOS%29%20-%205-8-18/EJ%20Element%20Master%20Text%20with%20Cover%205-8-18.pdf>

⁷ <http://www.per.saccounty.net/PlansandProjectsIn-Progress/Pages/Environmental-Justice-Element.aspx>

Attachment 2: Oversight from California’s Attorney General

The California Attorney General’s office has been engaged in an effort to oversee SB 1000 implementation, addressing planning efforts both in Riverside county, and the city of Fontana through formal letters. With Attorney General oversight of this process, there is significant potential for Sacramento to become a statewide leader. Here we highlight recommendations from the AG’s office letter to Riverside County⁸ which are reflected in the lessons learned and recommendations made above. Notably, the letter recognizes Sacramento county as having had a “robust public engagement process to develop and adopt Phase One of its Environmental Justice Element”. This is likely referring to the County’s efforts to draw comments on the Phase 1 EJ element at five CPAC workshops, in each of the identified EJ communities⁹.

Recommendations by the Attorney General to the County of Riverside, and implications for Sacramento County

- I. Riverside County should “develop a plan to implement its EJ policies” which should “be included as a part of the General Plan Amendment”, and include “a detailed description of the planned implementation activities and timeline that is available for public review and comment.”, “This will ensure that the general plan amendment is developed and implemented through a transparent process that reflects community input and includes written standards”.
 - **Implications for Sacramento:** Sacramento County Planners have not released EJ element policies for public comment. An implementation plan for the EJ element has not been created.

- II. Riverside County “should partner with local community groups to advertise these meetings”
 - **Implications for Sacramento:** Sacramento County Planners partnered with the Black Child Legacy Campaign in their most recent community workshop (January 22nd, 2019) on the EJ element in the North Highlands area. This was the most successful workshop to date for a variety of reasons, including that attendance of community members was highest, and county staff had begun to refine their facilitation skills and workshop format.

⁸ <https://drive.google.com/file/d/1eIFgnL6NQNXnCC2Rjct1OFjj1WnbfX6a/view?usp=sharing>

⁹ See page 10 for discussion around Phase 1 CPAC workshops:

<http://www.per.saccounty.net/PlansandProjectsIn-Progress/Documents/Environmental%20Justice%20Element/Phase%201%20Approval%20%28BOS%29%20-%205-8-18/BDL%20-General%20Plan%20Amendment%20To%20Add%20The%20Environmental%20Justice%20Element..doc%205-8-18.pdf>

III. Riverside County planners should “offer information about the general plan amendment, including information prepared for meetings to discuss the amendment, in English and Spanish through appropriate interpretation or translation services”

- **Implications for Sacramento:** Professional interpretation services were not present at community workshops for the EJ Element to date. Surveys and brochures were translated into multiple languages.

IV. Riverside County planners should “provide public responses to the comments and concerns raised by community members throughout the public input process, including those concerns raised in comment letters and during any future public meetings. Revise the General Plan Amendment as necessary to address community concerns”

- **Implications for Sacramento:** Planners have not provided justifications in writing in response to recommendations from the EJ Advisory Committee, nor have public comments given during workshops been addressed in a meaningful way. Furthermore, we expect a thorough response to the comments and recommendations given in this letter.