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RE: Comments on the Draft Environmental Justice Element

This letter is comment on the Environmental Justice Element being added to the Fresno County General Plan.

I will address two aspects of the new element: (1) the wording and workability of policies and programs and (2) the degree to which the new element satisfies the objectives and policies required by SB 1000.

This letter also addresses environmental impacts not addressed in the Environmental Justice Element, those that stem from years of governmental indifference to the needs of disadvantaged communities.



Although Fresno County is one of the richest agricultural regions in the nation, it is also home to some of the poorest communities.

Among the poorest are unincorporated communities that lack the most basic features of healthy, sustainable neighborhoods: safe housing, recreational facilities, sewer systems, potable drinking water and access to critical services. Isolated for decades and governed by a county government that is not set up to provide urban services, these poorer communities have been systematically underserved in the overall allocation of public resources and have frequently been left out of local decision-making processes.

Away from the public eye, the number and condition of these communities was not widely known until quite recently. That changed with the passage of Senate Bill 244 (Wolk, 2011), which required cities and counties to update their respective general plans to identify disadvantaged communities and to assess the adequacy of public facilities and services within them, including water supply, sewers, storm drainage and fire protection.

The County of Fresno failed to comply with AB 244 in a timely manner. As a consequence, in 2018, *Comunidades Unidas por un Cambio*, represented by the Leadership Counsel for Justice and Accountability, filed suit, and in March 2020, the Fresno County Superior Court gave the County 270 days to incorporate into its General Plan the information required by SB 244. On October 20, 2020, the County complied with the court order by incorporating an SB 244 analysis into the General Plan.

SB 244 was followed by SB 1000 (Leyva, 2016), which required cities and counties to add an environmental justice component to their respective general plans to include goals, policies, and objectives to reduce health risks, prioritize improvements in facilities and services and promote civil engagement in the decision-making processes that affect disadvantaged communities.

SB 1000 amended Government Code 65302, to read, in part, as follows:

“The general plan...shall include the following elements:

- (h) (1) An environmental justice element, or related goals, policies, and objectives integrated in other elements, that identifies disadvantaged communities within the area covered by the general plan of the city, county, or city and county, if the city, county, or city and county has a disadvantaged community. The environmental justice element, or related environmental justice goals, policies, and objectives integrated in other elements, shall do all of the following:
  - (A) Identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by means that include, but are not limited to, the reduction of pollution exposure, including the improvement of air quality, and the promotion of public facilities, food access, safe and sanitary homes, and physical activity.
  - (B) Identify objectives and policies to promote civil engagement in the public decisionmaking process.
  - (C) Identify objectives and policies that prioritize improvements and programs that address the needs of disadvantaged communities.

It is important to note that there is nothing in the language above to suggest that the application of SB 1000 is in any way limited to or focused on the processing of new discretionary land use projects.



I will begin my critique of the Environmental Justice Element by identifying wording errors and by flagging text that needs defining. This will be followed by discussions of funding uncertainties, timing concerns, implementation problems and SB 1000 compliance.

## 1. The County should correct errors in wording.

To improve readability, I suggest the Environmental Justice Element be edited as shown below.

ITEM	RECOMMENDED REVISION	REASONING / DISCUSSION
EJ-A.2	...require buffering and screening <del>requirements</del> as part of...	The word <u>requirements</u> is redundant.
EJ-A.4	...improving <del>resident</del> <u>residential</u> air quality...	Typically, the word <u>resident</u> is used for people; the word <u>residential</u> for buildings.
EJ-A.6	...near <del>existing</del> sensitive land uses.	The word <u>existing</u> is unneeded.
EJ-B.3	The County shall <del>collaborate</del> <u>partner</u> with	Delete either the word <u>collaborate</u> or the word <u>partner</u> .

EJ-B.7	The County shall work with local community services districts in disadvantaged communities to <del>provide support and assistance in their development of develop</del> park improvement funds for parks in disadvantaged communities that are not owned or operated by the County.	I recommend deleting the phrase <i>provide support and assistance</i> simply because it does not add meaning to Policy EJ-B.7.
EJ-C.4	The County shall encourage <del>the consistent</del> access to healthy foods...	The word <i>consistent</i> implies that access to healthy foods is discontinuous, i.e., existing at times and not at others, which I don't think is the case. If an adjective is needed, I suggest using <i>sustained, continuous</i> or <i>unbroken</i> ."
EJ-C.5	access to food for <del>insecure</del> residents in disadvantaged communities.	The word <i>insecure</i> is used incorrectly and is unneeded.
EJ-E.1	... conduct <del>ongoing</del> periodic workshops in...	The word <i>ongoing</i> is used incorrectly.
EJ-E.4	...information is equitably dispersed and <del>simply</del> understood.	The word <i>simply</i> is used incorrectly.
EJ-A.A	...potential project impacts associated with odor, light, glare, <del>groundwater contamination</del> and air emissions...	I don't believe the County approves projects that contaminate groundwater.
EJ-A.C	... to <del>the</del> local commercial and industrial <del>industry operations</del> .	These changes improve readability.
EJ-D.B	Implements Policy EJ-D. <del>32</del>	The Environmental Justice Element does not contain a policy labeled EJ-D.3. My assumption is that Program EJ-D.B implements Policy EJ-D.2.
Goal EJ-A	<p><del>To ensure 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 do not disproportionately impact any individual race, any culture, income or education level.</del></p> <p><u>To ensure the fair treatment of all people regardless of race, culture, national origin, income, and educational level through the development, implementation and enforcement of protective environmental laws, regulations, and policies.</u></p>	<p>As currently written (struck-through), the goal is difficult to understand.</p> <p>The underlined text at the left is but one way to restate the goal. There are several phrases that can substitute for the word <i>through</i>. They include <i>as regards, with respect to and vis-à-vis</i>.</p>
Goal D	<u>To</u> <del>E</del> nsure that...	Add the word <i>To</i> to match the format of other goals in the General Plan.
Goal E	<u>To</u> <del>E</del> nsure that...	Add the word <i>To</i> to match the format of other goals in the General Plan.

## 2. The County should define inexplicit terms or use words with more specific meaning.

I have a background in linguistics and am aware of the challenges associated with drafting policy statements that are at once concise and unambiguous. I see in the Environmental Justice Element many opportunities to strengthen understanding through careful editing. Unnecessary descriptors can be eliminated. As needed, words and phrases with indistinct or ambiguous semantic features can be more precisely defined.

### 2A. NOUNS AND ADJECTIVES

TEXT	ITEM	REASONING / DISCUSSION
<i>Adjacent</i>	EJ-A.2	Does <u>adjacent</u> mean <u>contiguous with</u> or <u>at a certain distance from</u> , in which case, what is that distance?
<i>Agencies, local</i>	EJ-E.1	Can these <u>agencies</u> be identified? And have they consented to partner with the County to hold periodic workshops?
<i>Applicable</i>	EJ-A.7	What are <u>applicable</u> permits, as opposed to those that are not?
<i>Appropriate</i>	EJ-A.1 EJ-A.15	In Policy EJ-A.1, perhaps the phrase <u>appropriate distance</u> should be replaced by the phrase <u>safe distance</u> .  In Policy EJ-A.15, what are <u>appropriate</u> measures, as distinct from inappropriate measures? Perhaps the word <u>mitigation</u> should replace the word <u>appropriate</u> .
<i>Emissions</i>	EJ-A.3	What kind of <u>emissions</u> are these? Because Program EJ-A.C ensures implementation of Policy EJ-A.3, and since the Air District is mentioned in Program EJ-A.C, I assume that these are <u>air emissions</u> . If so, Policy EJ-A.3 should so state.
<i>Food banks</i>	EJ-C.G	For the purpose of this policy, what defines <u>food banks</u> ? Are these food banks the same food pantry and fresh produce distribution centers currently mapped on the County Health Department's website? <a href="https://www.fresnocountyca.gov/Departments/Public-Health/About-Us/Fresno-County-Food-Map">https://www.fresnocountyca.gov/Departments/Public-Health/About-Us/Fresno-County-Food-Map</a>
<i>Food deserts</i>	EJ-C.2, EJ-C.4, EJ-C.D	Program EJ-C.D requires the County to develop its own local definition of <u>food deserts</u> and develop a map of food access points. As pointed out directly above, the County already has a map of food distribution locations. With respect to defining <u>food deserts</u> , I highly recommend the County incorporate into the Environmental Justice Element a definition similar to what has been adopted by our federal and California governments.
<i>Food network</i>	EJ-C.5	Policy EJ-C.5 currently reads, " <i>The County shall partner with local stakeholders and <u>food networks</u> to decrease the barriers to accessing the <u>food network</u> and develop policy solutions to address food insecurity and building resilience in the <u>food network</u> to increase consistent, readily available access to food for insecure residents in disadvantaged communities.</i> "

Because *food network* is undefined, there is no way to know whom the County will partner with, nor is it possible to know the nature of the barriers that block access to those networks.

<i>Infrastructure</i>	EJ-A.11, EJ-A.H	Although the word <i>transportation</i> appears in this policy, to make clear that the infrastructure under consideration is related to transportation and transportation only, perhaps the policy should read <i>transportation infrastructure</i> . This change also should also be made to Implementation Program EJ-A.H.
<i>Issues, roadway</i>	EJ-B.8	As proposed, Policy EJ-B.8 reads, “ <i>The County shall prioritize street safety and accessibility by developing a Rural Complete Streets program addressing roadway issues in rural areas of the community.</i> ” Rather than refer to <i>roadway issues</i> , wording from the definition of “complete street,” as found in the Transportation and Circulation Element glossary could be added so that the policy would read, “ <i>The County shall prioritize street safety and accessibility by developing a Rural Complete Streets program to provide safe mobility for all users, including bicyclists, pedestrians, transit vehicles, truckers, and motorists.</i> ” If it’s necessary to actually list issues, a short list is found in Policy TR-A.24 (Rural Area Complete Streets).
<i>Local</i>	EJ-A.3	What are <i>local commercial and industrial developments</i> , as distinct from those that are not local?
<i>Medical service providers</i>	EJ-C.B	Who are these <i>medical service providers</i> ? Are they hospitals, clinics, or integrated managed care consortiums like Kaiser?
<i>Nonprofits</i>	EJ-A.4, EJ-E.1, EJ-C.G	Which <i>nonprofit</i> organizations are these? And have they agreed to partner with the County to enhance public awareness of ways to improve residential air quality (EJ-A.4), conduct periodic workshops in disadvantaged communities (EJ-E.1) and (3) help establish a countywide food recovery program (EJ-C.G)?  I doubt it, and I’m of the opinion that the County should not adopt policies it is not certain it can implement as written.
<i>Periodic, Periodically</i>	EJ-E.1, EJ-B.A, EJ-C.E	The periods of time between recurring workshops (EJ-E.1), meetings (EJ-B.A) and the updating of stakeholder lists (EJ-C.E) are not defined. As a result, the timing of implementation is completely uncertain. Do the words <i>periodic</i> and <i>periodically</i> mean weekly, monthly, yearly — or whenever there’s benefit?
<i>Resources</i>	Goal C	If the <i>resources</i> mentioned in Goal C are not described or listed by name, how will the County be able to determine if the goal has been achieved?
<i>Stakeholder Stakeholders</i>	EJ-C.3, EJ-C.5, EJ-C.6	The words <i>stakeholder</i> and <i>stakeholders</i> appear a total of seven times in the seven elements of the Draft Policy Document under review: once in the Economic Development Element, once in the Public Facilities and Services Element, and five times in the new Environmental Justice Element.

The term *stakeholder* is undefined. As a result, with respect to the Environmental Justice Element, there is no way to know who will be participating with the County to educate the public about chronic diseases (EJ-C.3 and EJ-C.6) or develop policy solutions related to food insecurity (EJ-C.5).

## 2B. VERBS

TEXT	ITEM	REASONING / DISCUSSION
Collaborate	EJ-B.3	What is the nature of this collaboration? Perhaps Policy EJ-B.3 should be edited to read: <i>“The County shall <del>collaborate partner with local school districts and local, regional, and state organizations, if requested, to</del> develop safe and walkable pedestrian routes to school <u>in consultation with school districts and with local, regional and state organizations.</u>”</i>
Consider	EJ-E.4	Policy EJ-E.4 should read <i>“The County shall <del>consider</del> <u>accommodate the</u> diversity of its residents....”</i>
Coordinate	EJ-A.3	The use of the word <u>coordinate</u> is ineffectual because the County already maintains standards that require developers to incorporate the latest technologies and best practices into commercial and industrial projects.
Encourage	EJ-A.6, EJ-B.1, EJ-C.1, EJ-C.2, EJ-C.4, Goal E	<p>The word <u>encourage</u> has at least these three meanings:</p> <ol style="list-style-type: none"> <li>1. To offer confidence or hope; to hearten or inspire</li> <li>2. To give support or advice; to urge or persuade</li> <li>3. To promote or champion an action or outcome</li> </ol> <p>Since the encourager is focused on a goal or end to be accomplished by another person or entity, ultimately, success resides with the party that’s receiving the encouragement.</p> <p>I recommend that the County find a way to eliminate from the Environmental Justice Element every use of the word <u>encourage</u>, as encouragement does little to ensure success and does not get to the heart of the matter. In Goal E, the word can simply be deleted. In Policy EJ-B.1, it can be replaced by the word <u>facilitate</u>. Policy EJ-A.6 can be deleted altogether because encouraging Caltrans to take action is a pointless exercise.</p> <p>Lastly, it will take some ingenuity to reword policies that <u>encourage</u> the location of health care facilities within disadvantaged communities (EJ-C.1), the establishment of full-service (small and large) grocery stores (EJ-C.21) and consistent access to healthy foods (EJ-C.4). The County should choose language that puts the burden for the targeted action on the County rather than on other parties.</p>
Explore	EJ-B.2	The phrase <u>explore opportunities</u> is vague. I cannot recommend alternative wording because I don’t know if the objective of Policy EJ-B.2 is to remove all or some of the <i>“barriers to outdoor activity”</i> in disadvantaged communities, whatever barriers those might be.

<i>Partner (partnership)</i>	EJ-A.4, EJ-A.9, EJ-B.3, EJ-B.6, EJ-C.3, EJ-C.5, EJ-C.6, EJ-E.1, EJ-C.G	<p>These policies state as fact that the County will be partnering with various local, regional and state organizations. These organizations are, of course, autonomous, i.e., self-governing.</p> <p>The organizations include, by name, the San Joaquin Valley Air Pollution Control District and the Fresno County Tobacco Free Coalition. The Environmental Justice Element also mentions school districts generally and unnamed stakeholders, agencies, food networks and nonprofit organizations.</p> <p>There needs to be in the new element evidence that these organizations can and will enter into partnerships with the County. More specifically, prior to including in the General Plan any declaration of partnership, there needs to be a written description of how the partnership will function and written confirmation that the partner agrees to the partnership.</p>
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<i>Support</i>	EJ-A.9, EJ-D.2	<p>The use of the word <u>support</u> is unneeded.</p> <p>Policy EJ-A.9 can be revised to read: “<i>The County shall partner with the San Joaquin Valley Air Pollution Control District to <del>support-dispersing disburse</del> public education and information...</i>”</p> <p>Policy EJ-D.2 can be revised as follows: “The County shall <del>support vulnerable residents from disadvantaged communities by continuing to administer its programs that provide funding to support necessary fund</del> housing rehabilitation projects for senior residents, residents with disabilities, and low-income residents <del>as funding allows.</del>”</p>
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### **3. The County should remove from policies and programs all reference to funding.**

At first blush, my request that every reference to funding be removed from policies and programs may seem nonsensical, but I reason that it’s not. It’s a simple fact that every policy and program requires staff time and resources — and that takes dollars, but restating this truth ad nauseum does not help; instead, it distracts the reader from the ultimate purpose of these policies and programs.

Statements regarding the need for funding are found throughout the Draft Policy Document, but far more so in the Environmental Justice Element. By my calculation, funding is mentioned in 26% of the policies in the Environmental Justice Element but in only 4% of the policies in the other six elements of the Draft Policy Document. Likewise, funding is mentioned in 28% of the programs in the Environmental Justice Element as opposed to 12% elsewhere in the Draft Policy Document.

This heavy emphasis on funding tells me that the County is unsure it can implement the new element. And unwelcomely, focusing on the pursuit of funding may instill in under-served populations a sense that the County is doing all it can to achieve environmental justice.

In my opinion, because of the paucity — and unreliability — of the funding needed to fully implement the Environmental Justice Element, the County should add to the Draft Policy Document a separate section that outlines the County’s approach to establishing a dedicated funding stream, with contingencies, that ensures full implementation of that element.

Below are references to funding found in the policies and programs of the Environmental Justice Element.

TEXT	ITEM	REASONING / DISCUSSION
<i>As funding allows</i>	EJ-A.4, EJ-C.3, EJ-D.2	<p>The phrase <i>as funding allows</i> appears as the last three words in three policies. These policies address in-home air quality (EJ-A.4), public awareness of diet-related chronic diseases (EJ-C.3) and an avenue for residents with disabilities and others to rehabilitate their homes. By adding the phrase <i>as funding allows</i> to these policies, the County is essentially conceding up front that full implementation is unlikely.</p>
<i>Funding opportunities</i>	EJ-A.10, EJ-D.1, EJ-A.E	<p>These two policies and one program reference funding opportunities for the upgrade and expansion of community water and sewer systems (EJ-A.10), the financing of home-based improvements for income qualified residents (EJ-D.1) and the mitigation of roadway pollution (EJ-A.E).</p> <p>The identification of <i>funding opportunities</i> is an expression of hope that funding will be attainable, but as we all know, there is no assurance that funding will materialize or that it will be sufficient to meet the needs delineated in these three policies.</p> <p>Therefore, since funding is always sought, and since it most often falls short of what’s needed, I highly recommend that the County not refer to funding in individual policies and programs but, instead, devote a special section in the new element to a thoroughly discussion of this all-important subject.</p>
<i>Identify funding necessary to implement</i>	EJ-B.A	<p>It’s admirable that this program calls for the County to periodically work with local school districts and with local, regional, and state organizations to <i>identify funding necessary to implement</i> safe pedestrian routes to schools.</p> <p>However, holding meetings periodically or at the time that unincorporated community plans are updated (which rarely happens), is very likely a path to failure. There is no reason to take a piecemeal approach to establishing safe routes to schools. Instead, this program can be amended to require the County, on its own accord, to prepare a study that assesses pedestrian safety and the funding needed for a global solution to the problem of safe routes to schools. By doing this, projects can be “shovel ready” when funding becomes available.</p>
<i>Seek funding</i>	EJ-A.5, EJ-A.11, EJ-B.5, EJ-B.7, EJ-A.D, EJ-A.H, EJ-B.B, EJ-B.C, EJ-D.B	<p>These policies and programs state that the County will <i>seek funding</i> to mitigate roadway pollution (EJ-A.5), develop transportation projects that support the use of bicycles, wheelchairs, electric scooters, skates and skateboards (EJ-A.11 and EJ-A.H), expand and maintain existing bicycle routes (EJ-B.5), improve parks (EJ-B.7 and EJ-B.B), establish a Healthy Homes HVAC retrofitting subsidy program (EJ-A.D), develop a Rural Complete Streets Program (EJ-B.C) and implement various housing programs (EJ-D.B).</p>



These are worthwhile endeavors, and I'm sure the County is seeking funding for hundreds of other projects, but based on past and present County practices, the creation of new policies and programs directing the County to seek funding is no triumph and nothing about which to be satisfied. In March 2019, the League of Women Voters of Fresno published a report titled *2017 General Plan Annual Progress Report (For Fresno County)* in which the League determined that the County has been unable to demonstrate complete and successful implementation of two thirds of the programs in the current 2000-2020 General Plan. And what is cause of this shortcoming? As explained in the League publication, the County asserts that the lack of implementation is primarily due to the absence of a funding stream dedicated to implementing the General Plan.

If it's true that the lack of a dedicated funding stream is the primary reason for plan failure, then I reason that if the County is truly serious about achieving the goals contained in this new element, it will prepare, as part of this revision of the General Plan, a fiscal analysis of the funding needed to fully implement each policy and program in the new element. Documentation is essential, and it's necessary to note here that directives in the Environmental Justice Element requiring the County to seek funding have no provision for the establishment of paper trails. If the new element is adopted as written, there will be no trouble-free way for the public to ascertain whether the County has been following through on its obligations to seek funding.

#### **4. The County should provide better information about timing and timeframes.**

It's common for Fresno County General Plan policies and programs to contain the word continue. The word typically appears between the word "shall" and an infinitive, as for example in Policy OS-E.7, which reads, "*The County shall continue to closely monitor pesticide use in areas adjacent to habitats of special-status plants and animals.*" The word seems to express unceasing due diligence by the County when it comes to matters pertaining to public safety and environmental protection.

The word continue appears three times in the new Environmental Justice Element — in one policy and in two programs — and it could just as easily have been added to other policies and programs. For example, the word continue could be added to Policy EJ-A.2 to read, "*The County shall continue to require buffering and screening requirements as part of the development review process for all new potentially pollution producing land uses proposed to be located adjacent to existing sensitive land uses....*"

Now it may seem counterintuitive, but I recommend that the County delete the word continue from policies and programs in the Environmental Justice Element. The reason? First of all, the word doesn't enhance the public's understanding of the essence of the directives in these policies and programs. Secondly, the word continue calls to question the need to add such policies and programs to the Environmental Justice Element, for if the County is currently engaged in such tasks as a result of directives in other parts of the General Plan, why take steps to write them into the new element?

Should the County agree that the word continue can be deleted, these edits can be made:

**Policy EJ-D.1**

The County shall ~~continue to~~ administer its Housing Assistance Rehabilitation Program (HARP) and explore expanded funding opportunities to finance home-based improvements for income qualified residents.

**Program EJ-A.F**

The County shall ~~continue coordination~~ coordinate with the San Joaquin Valley Air Pollution Control District for project review and comment on both County- and privately-initiated projects.

**Program EJ-C.A**

The County shall ~~continue to~~ promote Federally Qualified Health Centers (FQHCs) within disadvantaged areas through letters of support and engagement with local city and County decision-making bodies.

Evaluation of the word continue brings to mind this question: Just how many of the directives and tasks listed in the Environmental Justice Element are new to the County? Asked another way, how many of the programs in the new element are already being implemented?

Because the new element is short on explanation, this question is a bit difficult to answer. Still, there are ways to reason things out. One way is to imagine what program startup might look like. Another is to check the timeframes listed in Part III of the Draft Policy Document.

**4A. VARIABILITY IN THE STARTUP TIMES FOR NEW IMPLEMENTATION PROGRAMS**

The six programs listed below illustrate the variability in program startup times. The first two programs are already being implemented, so no startup is needed. The next two are partially implemented at this time, and the last two will not be implemented until after the Draft Policy Document is adopted.

**Program EJ-A.A**      *During the development review process, the County shall ensure that adequate measures, including but not limited to, landscaping, buffers, and setbacks are incorporated into each project to minimize potential project impacts....*

What’s known:      **Described above is the County’s current procedure for processing permits.**

What’s unknown:    **Nothing.**

Conclusion:        **This program is in effect and will not change the way the County functions.**

**Program EJ-A.F**      *The County shall continue coordination with the San Joaquin Valley Air Pollution Control District for project review and comment on both County- and privately-initiated projects.*

What’s known:      **This program reflects County practice for processing new permits.**

What’s unknown:    **Nothing.**

Conclusion:        **This program is in effect and will not change the way the County functions.**

<b>Program EJ-C.A</b>	<i>The County shall continue to promote Federally Qualified Health Centers (FQHCs) within disadvantaged areas through letters of support and engagement with local city and County decision-making bodies.</i>
What's known:	<b>The County currently has a list of FQHCs on its website.</b>
What's unknown:	<b>Are there additional opportunities available to the County to promote FQHCs?</b>
Conclusion:	<b>This program is partially in effect and may change the way the County functions.</b>
<b>Program EJ-C.H</b>	<i>The County shall establish, in partnership with local nonprofits and food banks, a countywide food recovery program focused on increasing food access in low-income communities.</i>
What's known:	<b>The County currently has on its website information regarding twelve key food recovery organizations operating within the County.</b>
What's unknown:	<b>How will entering into partnerships increase access to food?</b>
Conclusion:	<b>This program is partially in effect and may change the way the County functions.</b>
<b>Program EJ-C.D</b>	<i>The County shall develop a local definition of food desert and develop a food desert map (food access points). The County will evaluate available public transportation routes and assess feasibility of integration into an existing public asset or increasing/adding healthy food availability services.</i>
What's known:	<b>The County does not have a definition of <i>food deserts</i>, and no map as well.</b>
What's unknown:	<b>Nothing.</b>
Conclusion:	<b>This program is not in effect and will change the way the County functions.</b>
<b>Program EJ-C.F</b>	<i>The County shall include provisions in its Zoning Ordinance that permits [sic] the establishment and operation of farmer's markets without the need for a discretionary development review permit.</i>
What's known:	<b>The County currently requires a permit to operate a farmers market.</b>
What's unknown:	<b>Nothing.</b>
Conclusion:	<b>This program is not in effect and will change the way the County functions.</b>

These six programs illustrate variability and uncertainty with respect to the start times for individual implementation programs and, in consequence, the potential impact on the way the County does business. By my calculation, of the twenty-five programs added to the General Plan through the Environmental Justice Element, five are currently being implemented and will not alter the way the County does business, and seven will most definitely change the way the County operates.

Of the remaining thirteen programs, there's no way to know whether they will have much effect on the way County government functions, and this is because the County has not provided supporting documentation to explain how these new programs will operate.

The chart on the following page represents my best guess as to the degree in which the timing of each new implementation program will affect the workings of the County.

## All 25 IMPLEMENTATION PROGRAMS IN THE ENVIRONMENTAL JUSTICE ELEMENT

ITEM	PRINCIPAL PURPOSE OF THE NEW IMPLEMENTATION PROGRAM	<i>Changes the Way the County does Business</i>		
		No	Maybe	Yes
EJ-A.A	Ensure adequate mitigation measures to protect sensitive uses	✓		
EJ-A.B	Incorporate pollution standards into the Zoning Ordinance		✓	
EJ-A.C	Develop a list of pollution reducing technologies and best practices		✓	
EJ-A.D	Seek funding to establish an HVAC retrofitting subsidy program			✓
EJ-A.E	Seek funding to mitigate roadway pollution		✓	
EJ-A.F	Receive comments from the Air District regarding new projects	✓		
EJ-A.G	Provide public notice of new discretionary projects		✓	
EJ-A.H	Develop a list of infrastructure and active transportation projects		✓	
EJ-A.I	Apply to new uses the industrial standards in the Zoning Ordinance		✓	
EJ-B.A	Seek funding to implement safe routes to schools		✓	
EJ-B.B	Develop a targeted Park Improvement Fund			✓
EJ-B.C	Seek funding to develop a Rural Complete Streets Program			✓
EJ-C.A	Continue to promote Federally Qualified Health Centers		✓	
EJ-C.B	Identify obstacles to providing medical services			✓
EJ-C.C	Maintain/add new routes to health facilities and shopping outlets			✓
EJ-C.D	Develop a definition of food deserts and map the same		✓	
EJ-C.E	Develop a stakeholders list for education on diet-related diseases		✓	
EJ-C.F	Eliminate the permit requirement for operating farmers markets			✓
EJ-C.G	Establish a food recovery program		✓	
EJ-C.H	Evaluate resources to support a food recovery program		✓	
EJ-C.I	Provide public information about chronic diseases	✓		
EJ-D.A	Provide public notices about discretionary projects	✓		
EJ-D.B	Seek funding from state and federal housing programs	✓		
EJ-E.A	Educate residents about health services and housing programs		✓	
EJ-E.B	Adopt a public notice and outreach policy document			✓

Without more information from the County, it's not possible for county residents to anticipate when new programs will go into effect and, therefore, how they will transform County practices and ultimately improve resident health and sustainability of disadvantaged communities.

A good example of the lack of information is Program EJ-A.G., which is designed to provide residents in disadvantaged communities with opportunities to review and comment on discretionary land use projects in their communities. Program EJ-A.8 implements Policy EJ-A.8. The policy and program are printed below.

### **Policy EJ-A.8**

*The County shall provide residents within disadvantaged communities the opportunity to review and comment on discretionary development projects within their communities.*

### **Program EJ-A.G**

*The County shall mail a written notice to property owners and occupants within 15 days of the County's acceptance of a discretionary development review application located within a disadvantaged community. Notification shall be in English and Spanish and shall provide the opportunity for residents to submit written comments within 15 days following the date of the notice. Notification shall be from the exterior boundary of the property proposed for development and shall be in accordance with the Fresno County Zoning Ordinance public noticing requirements.*

Policy EJ-A-8 will not alter County practice, as the task expressed in the policy is already in effect. It’s standard practice for the County to notify residents when discretionary land use projects are proposed in their communities and to provide opportunities for review and comment.

But what of Program EJ-A.G? Are the two 15-day time periods a departure from current practice? And will printing notices in English and Spanish be a change as well? Without this information, there’s no way to know whether adoption of Program EJ-A.G constitutes a change in the way the County does business or whether the program simply memorializes what’s already taking place.

**4B. IMPLEMENTATION TIMEFRAMES LISTED IN PART 3 OF THE DRAFT POLICY DOCUMENT**

Part 3 of the Draft Policy Document houses the implementation programs for the new Environmental Justice Element. Included in Part 3 is a grid that lists the anticipated timeframes for the implementation of each program.

Important to the timely implementation of General Plan programs is this statement on page 3-6 of the Draft Policy Document:

*“Each implementation program is followed by...an estimated timeframe for implementation. **The identified timeframes are general guidelines and may be adjusted based on County staffing and budgetary considerations.**”* [My highlighting.]

Now admittedly, the statement that timeframes can be “*adjusted based on County staffing and budgetary considerations*” is a major defect in the General Plan, as a lack of funding could postpone program implementation indefinitely. But be that as it may, there are other problems associated with these timeframes, most notably their lack of definition and their misapplication to individual programs.

The Draft Policy Document lists four possible timeframes for program implementation: *2021-2025*, *2025-2030*, *Annual* and *Ongoing*. Shown below are the timeframes assigned to 24 of the 25 programs in the Environmental Justice Element. (The County failed to assign a timeframe for Program EJ-C.D.)

<b>Timeframe</b>	<b>Implementation Program</b>
<b>2021-2025</b>	EJ-A.D, EJ-C.E, EJ-C.F, EJ-C.G, EJ-C.H, EJ-E.B
<b>2025-2030</b>	∅
<b>Annual</b>	∅
<b>Ongoing</b>	EJ-A.A, EJ-A.B, EJ-A.C, EJ-A.E, EJ-A.F, EJ-A.G, EJ-A.H, EJ-A.I, EJ-B.A, EJ-B.B, EJ-B.C, EJ-C.A, EJ-C.B, EJ-C.C, EJ-C.I, EJ-D.A, EJ-D.B, EJ-E.A

Unfortunately, the Draft Policy Document does not define these timeframes other than to say that they are estimated time periods for “implementation” of each program. But that simple definition is of no help at all. There are too many unknowns. For example, is the 2021-2025 timeframe the period in which to start implementation — or is it the period in which to complete it? And what happens to a program post 2025? There are similar uncertainties with the Ongoing timeframe. Are the 18 programs with that designation already in effect? If not, what are the target years for their initiation and completion?

Because timeframes are undefined and because program implementation can be delayed indefinitely due to insufficient funding, the designation of timeframes for implementing programs is, quite frankly, a rather valueless exercise. Programs EJ-A.B and EJ-B.C serve to illustrate this point.

### **Program EJ-A.B**

The timeframe for Program EJ-A.B is listed as *Ongoing*. The aim of this program is to incorporate “*development standards*” into the Zoning Ordinance — more particularly, the screening and buffering standards identified in companion Policy EJ-A.2.

Program EJ-A.B and Policy EJ-E.8 are printed below:

#### **Program EJ-A.B**

*The County shall incorporate into its Zoning Ordinance development standards and [sic] that address potentially pollution producing land uses that are proposed to be located adjacent to existing sensitive land uses (such as residential uses, schools, senior care facilities, and day care facilities).*

#### **Policy EJ-A.2**

*The County shall require buffering and screening requirements as part of the development review process for all new potentially pollution producing land uses proposed to be located adjacent to existing sensitive land uses that have historically been associated with heightened levels of pollution. These land uses associated with pollution include industrial land uses, agricultural operations using pesticides applied by spray techniques, wastewater treatment plants, and landfills and waste treatment facilities.*

The timeframe *Ongoing* is inappropriate for Program EJ-A.B simply because the placement of screening and buffering standards into the Zoning Ordinance must take place at a discrete point in time — either as part of the concurrent update of the Zoning Ordinance, which is anticipated to be approved in late 2023 or early 2024, or as a separate task to be completed shortly thereafter. In either case, the incorporation of screening and buffering standards is time-specific is not an *Ongoing* process.

The pending update of the Zoning Ordinance contains new Section 8.22.3.090 (*Screening and Buffering*). It also contains new Section 181.2.080 (*Highway Beautification Overlay Zone Property Development Standards*), which promotes consistent aesthetic provisions for the screening and buffering of new development along Highway 99.

I’m not sure whether the screening and buffering standards written into the draft update of the Zoning Ordinance are the same standards required by Program EJ-A.B and Policy EJ-A.2, but if they are, once the Zoning Ordinance is updated, the tasks specified in Program EJ-A.B will be moot — and the *Ongoing* timeframe will be meaningless.

If, on the other hand, Program EJ-A.B and Policy EJ-A.2 require the development of screening and buffering standards that are not part of the present update of the Zoning Ordinance, then, the incorporation of such standards into the Zoning Ordinance would still need doing. However, the *Ongoing* timeframe would still be inappropriate, as the County would need to select either 2012-2025 or 2025-2030 for the initiation and completion of that task.

## **Program EJ-B.C**

The timeframe for implementing Program EJ-A.B is also listed as *Ongoing*. The aim of this program is to seek funding to develop a Rural Complete Streets program. The companion policy is identified as Policy EJ-A.8; however, Policy TR-A.24 is equally applicable.

Program EJ-A.B and Policies EJ-E.8 and TR-A.24 are printed below:

### **Program EJ-B.C**

*The County shall seek funding from the Department of Transportation's Safe Streets and Roads to develop the Rural Complete Streets Program.*

### **Policy EJ-B.8**

*The County shall prioritize street safety and accessibility by developing a Rural Complete Streets program addressing roadway issues in rural areas of the community.*

### **Policy TR-A.24**

*The County shall strive to serve all users on rural roadways in the county by designing and constructing rural roadways to serve safely bicyclists, transit passengers, and agricultural machinery operators. This includes:*

- a. Constructing wide shoulders to provide a safe space for bicyclists, and agricultural machinery vehicles;*
- b. Removing visual barriers along rural roads, particularly near intersections, to improve the visibility of bicyclists; and*
- c. Coordinating with local jurisdictions and Fresno COG to ensure multimodal connections are established and maintained between jurisdictions.*

Program EJ-B.C has two deliverables: (1) the search for funding and (2) the development of a Rural Complete Streets program. The only way this program could be *Ongoing* is if the County fails to find funding over the life of the plan, i.e., over the twenty years from 2023 to 2042.

Two questions come to mind: What year will the County begin to seek funding? and what is the target year for developing a Rural Complete Streets program? Unfortunately, there's no way to know. It would make far greater sense to choose either 2012-2025 or 2025-2030 as the timeframe for developing a Rural Streets Program.

It's my strong belief that the absence of meaningful timeframes for the initiation and completion of implementation programs can lead to plan failure and can disengage county residents who feel disempowered when they cannot figure out what to expect in the way of progress toward implementing and completing General Plan programs. The timeframe *Ongoing* is totally inappropriate in this instance unless, of course, it actually means not likely to ever get done.

## **5. The County must include objectives in the Environmental Justice Element.**

SB 1000 requires the County to add to its General Plan an environmental justice element that includes goals, policies and objectives that will reduce health risks, promote civil engagement and prioritize improvements for those residing in disadvantaged communities.

I see goals, policies and programs in the Environmental Justice Element, but no objectives.

For me, the words *goal* and *objective* have these meanings: A *goal* is an achievable outcome that is generally broad and long term while an *objective* is a shorter-term measurable component of a strategy designed to achieve a particular goal. Sometimes the words *goal* and *objective* are used interchangeably, but in the case of SB 1000, that's not the case, as the two words appear together as part of a string of nouns in the statute: "*goals, policies and objectives.*" The two words must have dissimilar meanings.

Objectives can be applied to policies and programs alike. Policy EJ-A.4 and Program EJ-A.H are good examples to show how this can be done.

#### **Policy EJ-A.4**

This policy has two deliverables. They are...

- To partner with the Fresno County Tobacco Free Coalition and local nonprofit organizations.
- To enhance public awareness of ways to improve residential air quality.

Policy EJ-A.4 is printed below:

#### **Policy EJ-A.4**

*The County shall partner with the Fresno County Tobacco Free Coalition, and local nonprofits to educate and enhance public awareness on improving resident air quality, including lead mitigation and clean air technologies (HEPA filters and ventilation systems) and reducing secondhand smoke exposure to residents in multi-unit housing as funding allows.*

While there are many objectives that can be applied to this policy, depending on how carefully one wants to map out a strategy for successful implementation, for the purposes of this comment letter, I've listed three straightforward, commonsense objectives.

- Obj. 1 To ascertain the level air pollution in homes within disadvantaged communities.
- Obj. 2 To develop the educational materials needed to enhance public awareness.
- Obj. 3 To determine which nonprofits have the capacity to help implement the policy.

With regard to this particular policy, it's important to note that since the County has already partnered with the Fresno County Tobacco Free Coalition, the Coalition is probably well-suited to help implement the first two objectives. Note also that in deference to Section E of the Environmental Justice Element, these three objectives would need to be developed in cooperation with the communities that Policy EJ-A.4 is targeted to serve.

And whatever objectives are ultimately developed, it's importance to recognize the value of routine data collection. One can't target problems one doesn't measure.

(As an aside, I believe Policy EJ-A.4 is wrongly placed in the Environmental Justice Element. It's located in Section A, which has as its goal the fair treatment of people with respect to the development, adoption, implementation and enforcement of environmental laws, regulations and policies. It would probably make more sense to move the policy to Section D, which has as its goal, access to safe and sanitary living conditions.)



## **Program EJ-A.H**

This program also has two deliverables. They are...

- To annually develop a list of infrastructure and active transportation improvement projects.
- To seek grant funding to implement these same projects.

Program EJ-A.H is printed below:

### **Program EJ-A.H**

*Annually, the County shall develop a list of viable infrastructure and active transportation improvement projects for its disadvantaged communities and shall seek available grant funding*

To successfully implement this program, the County could adopt objectives such as these:

- Obj. 1 To evaluate the infrastructure needs of disadvantaged communities.
- Obj. 2 To meet with residents to elicit their priorities to address these needs.
- Obj. 3 To determine the cost of said improvements and set annual revenue goals.

By adding to the Environmental Justice Element objectives that are welcomed by those living in disadvantaged communities, the County will be able to demonstrate that its embrace of environmental justice is genuine, that civil engagement is meaningful and that planned infrastructure upgrades are appropriate to the needs expressed by community members.

At first blush, it may seem cumbersome to add objectives to the Environmental Justice Element. However, there is already in the General Plan an example of how this can be done. The County's Housing Element contains goals, policies, programs — **and objectives**. By way of example, under Housing Goal 4, which calls for providing a range of housing types and services to meet the needs of individuals and households with special needs, the County has adopted Program 10. This program removes governmental constraints to securing adequate housing by amending zoning regulations. Printed below are two of the five objectives associated with this program.

#### *Timeframe and Objectives:*

- *Examine, in 2016, alternatives to requiring discretionary approval for the development of multifamily housing in the C-4 Zone District and adopt appropriate actions to expedite the review and processing of multi-family housing development applications.*
- *Annually review the effectiveness and appropriateness of the Zoning Ordinance and process any necessary amendments to remove or mitigate potential constraints to the development of housing.*

Adding objectives to the Environmental Justice Element is a must. But as an alternative to adding objectives directly to the element itself, the County has the option to develop a strategic plan to guide implementation of the new element. This approach is also not new to the County. The last time the County added a new element to the General Plan, it also created a companion document. In 2000, at the time the Board of Supervisors added an Economic Development Element to the General Plan, it also adopted a 58-page document titled "Economic Development Strategy," which provided a framework for achieving the County's vision of economic development.

The Economic Development Element and the Economic Development Strategy worked well together. To ensure successful economic development, both documents contained a requirement that the County create an “*Economic Development Action Team*” — a committee consisting of experts in the field of economics who were charged with coordinating the County’s plan for economic development. The new element and strategy also directed the County to create a staff position in the County Administrative Office to support the work of the team. And finally, the two documents stipulated that the County retain an independent institution to conduct periodic evaluations of the County’s success in achieving the goals and targets of the County’s Economic Development Strategy.

The following citation from the 2000 Economic Development Strategy encapsulates the value of this type of detailed, comprehensive planning.

*“A successful economic strategy is one that identifies and efficiently mobilizes available resources around the achievement of a clear and comprehensive vision for the community. It is also one that commands a broad base of support from among its citizens. The efficient mobilization of these resources is measured by how well the strategy identifies priority issues, articulates its goals and objectives consistent with those priorities, and takes advantage of available resources that can be fully committed to addressing these issues during the implementation process.”* (2000 Economic Development Strategy, page 19) (My underlining)

Perhaps we should all ask ourselves whether the Environmental Justice Element incorporates these same principles of good planning.

**Does the Environmental Justice Element identify and efficiently mobilize available resources around the achievement of a clear and comprehensive vision for the community?**

No, it does not. In fact, an argument can be made that the Environmental Justice Element envisions that rural communities will remain disadvantaged. Significant is the limited focus of the new element: “*To help ensure new development does not disproportionately impact disadvantaged communities.*” (Draft General Plan Policy Document, page 2-197) The County needs to do much more than protect disadvantaged communities from further harm.

**Does the new element command a broad base of support from among its citizens?**

No to that question as well. The County developed the Environmental Justice Element inhouse, that is, without input from the communities the plan is designed to serve. And, just as was done when the General Plan as last updated in 2000, the County has chosen again to exclude from the review of the General Plan any discussion of the viability of the antiquated community plans that continue to trouble many disadvantaged communities.

**Does the new element “prioritize” issues and articulate goals and objectives consistent with those priorities?**

No. Environmental justice issues are not prioritized. That said, the new element does state that the County will give priority to disadvantaged communities when seeking funding opportunities. The County also asserts that adopting a Rural Complete Streets program is one way to prioritize street safety and create a balanced multimodal transportation network.

**Does the new element take advantage of available resources that can be fully committed to addressing these issues during the implementation process?**

No. Two available resources that are left untapped. The first is the participation of the county's own citizenry. The second is the use of the County's own financial resources.

**Citizenry**

I attended the May 24, 2023 County workshop on the Environmental Justice Element held in Malaga. Malaga is listed as a “*disadvantaged community*” in federal, state and local documents. Below is a description of the environmental burden in Malaga as described in Section 3.12 (Environmental Justice) of the County's Draft General Plan Background Report.

*“Malaga is a census-designated place in central Fresno County, directly southeast of the City of Fresno, and is located in Census Tract 6019001500. This census tract experiences extremely high burden from both pollution and population characteristics. Overall, this census tract experiences burden from ozone, PM 2.5, pesticides, toxic releases, drinking water contaminants, cleanup sites, groundwater threats, hazardous waste sites, solid waste sites, high rates of asthma, high rates of cardiovascular disease, low levels of education, linguistic isolation, poverty, unemployment, and housing burden.”* (Draft General Plan Background Report, page 3-123)

At that meeting, one prominent member of the Malaga community entreated the County to empower residents to help resolve environmental problems in their community, saying (1) that residents had firsthand experience with such problems and (2) that Malaga residents, working with County staff, had the capacity to improve livability in their community. But his request seemed to fall on deaf ears. It can't be emphasized enough that the County drafted the Environmental Justice Element without input from the people who live in disadvantaged communities. In addition, the County has, for years, kept at arm's-length individuals and non-governmental organizations that champion better planning for such communities.

**County Funding**

Although the County has a stable General Fund budget reserve of at least \$70 million, the County does not budget for the update of community plans. In 2003, in compliance with General Plan Program H-A.H, which required the County to establish a plan (with timeframes) for updating regional and community plans, the Board of Supervisors accepted a prioritization plan prepared by the Planning Commission which called for the update of all regional and community plans by 2010, including those for disadvantaged communities.

But twenty years later, only two of the fourteen plans have been updated. County records indicate that the delay is caused by a lack of County funding and the absence of private development projects to fund the update of community plans. It's clear that unless there's a sea change, disadvantaged communities such as Biola, Caruthers, Del Rey, Easton, Lanare, Riverdale and Tranquillity, will not see their respective community plans updated anytime soon. The Del Rey Community Plan was last updated in 1976 — nearly 50 years ago.

## 6. The County must describe better to whom policies and programs apply.

A careful reading of the Environmental Justice Element reveals that 80% of the element’s goals and roughly 50% of its policies and programs are universal, that is to say that they apply to all rural areas of the county — disadvantaged or not. Other goals, programs and policies apply variably to different groups of people or to different locations within the county.

For example, while Goal EJ-A (the warranty of nondiscrimination) applies to everyone, Goal EJ.B (the promotion of a physically active lifestyle) applies to those living in “unincorporated communities.” Implementation programs have a similar range of application; for example, Program EJ-A.E (the mitigation of roadway pollution) applies across the county while Program EJ-C.G (increasing food access) applies only to those living in “low-income communities.” Not surprisingly, the same holds true for policy statements. Policy EJ-A.13 (the standards for shade coverage for industrial parking areas) applies to all new industrial development in the county, but Policy EJ-A.7 (coordination with the Air Pollution Control District to address air emissions) applies only to new projects located within the South-Central Fresno area.

It may be appropriate that goals, policies and programs in the Environmental Justice Element target different groups of people and locations, but if that’s so, the new element should include text that explains that wide range of application.

The element should also define key terminology. To understand how policies and programs are supposed to function, one must have a good understanding of the fourteen phrases listed in the chart below. They identify the communities and areas that are targeted to benefit from the implementation of policies and programs.

The phrases listed in the left column are defined. (For the definitions, see pages 8 and 9 of Appendix A — Policy Document glossary.) The phrases listed in the right column are not. One possible solution is to include in the glossary the seven phrases that are not defined, but I don’t recommend it. Instead, I suggest the County add to the opening pages of the Environmental Justice Element definitions for all fourteen terms. The introductory pages to the Environmental Justice Element already contain a lengthy description of existing environmental just conditions in Fresno County. It can just as easily include a section that defines the terminology that appears in policies and programs.

### **Terminology Used to Describe the Groups of People and Places that are to Benefit from the Implementation of the Environmental Justice Element**

<b>Defined in the General Policy Document</b>	<b>Undefined in the General Plan Policy Document</b>
1. Disadvantaged Community	1. Disadvantaged Areas
2. Disproportionate Effects	2. Income-Qualified Residents
3. Environmental Justice (EJ)	3. Residentially-Zoned Neighborhood
4. Low-Income	4. Rural Areas of the Community
5. Low-Income Area	5. Sensitive Land Uses
6. Meaningful Involvement	6. South-Central Fresno Area
7. Overburdened Community	7. Unincorporated Communities

While the County may not think it necessary to define all the terminology listed above, it has no choice but to provide a more precise definition of the term “*disadvantaged community*.” In April 2017, for the purpose of SB 535, CalEPA identified 62 disadvantaged communities in Fresno County. Those communities are listed on pages 2-193 and 2-194 of the Draft General Plan Policy Document. Three years later, for the purpose of SB 244, Fresno County identified 36 disadvantaged communities. They’re listed on pages 3-61 and 3-62 of the Draft General Plan Background Report.

The term “unincorporated community” is found in 11 policies and in 7 programs of the new element. It’s imperative that the County include a precise definition of the term. The need to do this is obvious, considering, for example, the implementation of Program EJ-A.H, which requires the County to annually “*develop a list of viable infrastructure and active transportation improvement projects for its disadvantaged communities*.” Does this directive apply to the group of 36 or to the group of 62?



To conclude, I find the current Draft Environmental Justice Element far from satisfactory, so much so, in fact, that I suggest it would be best for the County set it aside and start afresh. I’m saddened to report that the document is muddled, incomplete and ineffective as a plan to achieve environmental justice.

The County can restart the process by first creating an equitable vision for environmental justice in Fresno County. From what I can see in the draft element, the vision touted by the County is basically to do no more harm. While laudable, it’s far from sufficient. Healing is needed, and vision setting must be done with the engagement of those will be directly affected by the new element. In the spirit of Goal EJ-E, which is to “*facilitate equitable civic engagement in the decision-making process*,” the County needs to afford residents of disadvantaged communities a place at the table.

The County will need to enlist the help of residents as it examines further the needs of disadvantaged communities and develops and prioritizes measurable environmental justice objectives (with benchmarks and outcomes) that are satisfactory to residents. At the same time, the County will need to devise a plan to bring community plans up to date, and all this planning will need careful cost analysis.

To ensure that the Environmental Justice Element is successfully implemented, I highly recommend that the next iteration of the element also include policies and programs that direct the County to...

- Draft a companion strategy document for achieving the public’s vision of environmental justice
- Organize a team of professionals from the community to guide implementation
- Create a citizens oversight committee to advise County staff and the Board of Supervisors
- Establish a staff position with the sole duty to oversee implementation of the new element
- Develop a procedure to routinely report out progress toward achieving environmental justice goals.

Sincerely,

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