











June 21, 2023

City of Oakland Planning Department 250 Frank H. Ogawa Plaza, Suite 2114 Oakland, CA 94612

### RE: Comments on the City of Oakland's Draft Environmental Justice Element

Dear Lakshmi Rajagopalan, Khalilha Haynes, and the greater Oakland General Plan Update team.

On behalf of the undersigned organizations, thank you for the opportunity to provide comments on Oakland's Draft Environmental Justice (EJ) Element. We commend the City for including community-identified priorities such as participatory budgeting and community-driven, neighborhood-level planning. However, we strongly urge you to adopt the recommendations set forth in this letter to ensure the Final EJ Element includes the necessary corresponding actions to guide how the proposed policies will be effectively implemented. Our comments focus primarily on the following sections of the Draft EJ Element:

- Chapter 9 (Implementation Actions and Programs), including Table EJ-11 (Implementation Goals, Policies, and Actions) and with a particular focus on:
  - Goal EJ-8: Foster Meaningful Civic Engagement and Support Community Power and Capacity-Building
  - Goal EJ-10: Prioritize Improvements and Programs That Meet The Needs of Environmental Justice Communities

While the recommendations that follow are specific to the aforementioned sections, we encourage the Oakland General Plan Update team to develop EJ Actions that will effectively implement the Goals and Policies throughout the remainder of the Draft EJ Element.

This letter includes a summary of our recommendations, followed by detailed comments and specific recommendations. Lastly, we've included several appendices with supporting information and resources. Overall, we strongly recommend that Oakland's Final EJ Element include the necessary corresponding EJ Actions and details showing how the City plans to put the following components into practice during implementation:

- Support an ongoing, meaningful and accessible community engagement process;
- Foster trust and accountability with Oakland's EJ communities;
- Strengthen interdepartmental coordination and implementation;
- Evaluate the community engagement and EJ Element implementation process; and
- Support and resource capacity building for communities to anchor community-driven planning, decision-making and implementation processes in their neighborhoods.

#### **SUMMARY OF RECOMMENDATIONS**

- I. In the Final EJ Element, Chapter 9 (Implementation Actions & Programs) should include more details to strengthen implementation, increase interdepartmental coordination, and foster trust and accountability.
  - A. <u>Section 9.1:</u> Prioritizing Improvements and Programs that Meet the Needs of EJ Communities
    - 1. Include a detailed overview of the EJ Element's Implementation Plan in Section 9.1.
    - Develop a workflow to facilitate stronger interdepartmental coordination and accountability among lead departments for General Plan implementation.
  - B. <u>Table EJ-11:</u> Implementation Goals, Policies and Actions
    - 1. Clarify the specific timelines, responsibility roles and priority levels for each Action in the Final EJ Element.
    - 2. Add cost estimates to each action in the Final EJ Element.
    - 3. Prioritize and plan for funding the implementation of EJ Element Policies and Actions.
  - C. Policy EJ-10.2 & Action EJ-A.34: Implementation Monitoring and Evaluation Plan
    - 1. Track the implementation status of the EJ Element and provide open access to progress updates.

- 2. Allocate funding for, and hire a trusted third-party evaluator to annually review the implementation of the EJ Element in partnership with EJ Communities.
- II. In the Final EJ Element, Goal EJ-8 (Foster Meaningful Civic Engagement and Support Community Power and Capacity Building) should include the necessary corresponding EJ Actions and strategies to ensure that the EJ Element's implementation process includes ongoing, accessible and meaningful community engagement.

We urge the City to embrace open outcomes and adaptability in the planning and implementation process to ensure Oakland's EJ communities have a meaningful opportunity to shape and inform outcomes, rather than just provide feedback on predetermined outcomes. We strongly recommend that City of Oakland staff and contractors be frank and clear about the process, timeline, constraints, and the ways in which community engagement will be conducted and used throughout the EJ Element adoption and implementation process.

Additionally, we offer the following policy amendments, new policies and new actions for Goal EJ-8 to support an EJ Element implementation process that includes ongoing, meaningful and accessible community engagement.

	GOAL EJ-8 POLICY RECOMMENDATIONS		
Policy	Existing Policy Amendments [in red] & New Policy Proposals [in green]:		
Policy EJ-8.1	Meaningful. Relevant Engagement. Design and implement public engagement processes and events <i>in partnership with EJ Communities</i> that emphasize participation from low-income communities and communities of color; that are driven by resident priorities, that are easily accessible <sup>1</sup> and understandable and that provide meaningful opportunities for participants to influence outcomes <i>during the planning</i> , <i>implementation</i> , <i>and evaluation phases of the policy, project and/or program process</i> .		
Policy EJ-8.5	Community Capacity Building. Empower historically marginalized community members to participate in local decision-making-and-, engage meaningfully in planning efforts, advocate for "community and systems improvements[,] develop their skill sets as community leaders, and advancetheir roles as trusted messengers [and decision-makers]." including through—This includes, but is not limited to, increased representation in employment and civic life; providing educational/ training workshops and programs about civic involvement and processes, such as through academies,		

<sup>&</sup>lt;sup>1</sup> See Appendix A for Accessibility Recommendations

<sup>&</sup>lt;sup>2</sup> This policy was adapted from Policy EJ-15.3 in San Diego County's Environmental Justice Element. "Chapter 9 Environmental Justice." 09 Environmental Justice. Accessed June 21, 2023. https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/09-Environmental-Justice-Aug2021.pdf., 9-51

	fellowships and internships; providing organizational support to community-based organizations; and other capacity building activities.
NEW Policy #1	<u>Community-Led Initiatives.</u> Support community-driven initiatives that address priorities and needs related to the 10 EJ Element goals through funding, technical assistance, support with grant applications, "data sources, meeting spaces, support services, and other staff resources" <sup>3</sup>

	GOAL EJ-8 ACTION RECOMMENDATIONS			
Action	Existing Action Amendments [in red] & New Action Proposals [in green]			
EJ-A.32	Implement the City's roles and responsibilities as they relate to the establishment of the Oakland Climate Action Network (OCAN), a permanent neighborhood organizing support network summarized in Action CL-5 of Oakland's 2030 Equitable Climate Action Plan (ECAP) and detailed in the ECAP's Racial Equity Impact Assessment and Implementation Guide (REIA). This includes—but it not limited to—designating staff within each implementing department to be the/a community engagement partner and interdepartmental liaison; engaging with "neighborhood-based governance bodies" (i.e. OCAN committees); and hostingHost-an annual City-wide OCAN conference-of Neighborhood Empowerment Councils, where councils—community organizations, neighborhood councils, and residents plan proactively for healthy communities and provide feedback on General Plan implementation. <sup>5</sup>			
NEW Action #1	Actively seek federal, state and philanthropic funding, <sup>6</sup> in partnership with EJ communities and develop proposals in alignment with community goals. Reevaluate departmental budgets within all City departments' budgets to support ongoing, meaningful and accessible community engagement for EJ Communities. <sup>7</sup>			
NEW Action #2	"Provide popular education about rights and resources to all community members.  Educational campaigns are a too infrequently used approach for bringing Oaklanders together around shared goals across socioeconomic and racial/ethnic lines. City efforts to increase access to resources for the most vulnerable residents should utilize paid partnerships with CBOS [community-based organizations] to develop and deploy community-based campaigns.			

<sup>&</sup>lt;sup>3</sup> This policy was adapted from Policy EJ-14.2 in San Diego County's Environmental Justice Element. "Chapter 9 Environmental Justice." 09 Environmental Justice. Accessed June 21, 2023.

https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/09-Environmental-Justice-Aug2021.pdf., 9-50

Tobias, Marybelle Nzegwu, Colin Miller, David Jaber, and Sooji Yang. "2030 Equitable Climate Action Plan Racial Equity Impact Assessment & Implementation Guide." FINAL\_Complete\_EF-Racial-Equity-Impact-Assessment\_7.3.2020\_v2.pdf. July 3, 2020. https://cao-94612.s3.amazonaws.com/documents/FINAL\_Complete\_EF-Racial-Equity-Impact-Assessment\_7.3.2020\_v2.pdf., 23

<sup>&</sup>lt;sup>5</sup> See Appendix F for more details about the Oakland Climate Action Network (OCAN)

<sup>&</sup>lt;sup>6</sup> Such as programs funded through the Infrastructure Investment and Jobs Act (IIJA) and the Inflation Reduction Act (IRA)

<sup>&</sup>lt;sup>7</sup> See Appendix B for Community Engagement Budgeting Recommendations

	Popular education carried out through Oakland resident leadership can help the City meet residents where they are, overcome barriers to understanding, pay respect to existing community knowledge and lived experience, and ensure that everyone has the ability to participate equitably in creating and sharing knowledge."8
NEW Action #3	Integrate community-led and community-driven initiatives into City planning processes, such as other General Plan elements, future action and area plans, the Capital Improvement Program (CIP) process, the adopted City budget, bond measures, and other City investments and resource allocations.
NEW Action #4	Establish or leverage a paid community advisory and oversight committee or board to support an equitable and community-driven implementation of Oakland's Environmental Justice Element or overall General Plan. The advisory body should represent Oakland's EJ Communities and diversity, have lived and technical experience in the relevant topic areas, and be adequately compensated, trained, and supported to engage in the City's feedback channels.
NEW Action #5	"Improve Citywide community engagement information gathering and sharing practices. Rather than having each City department collect and refer to community input in silos, develop and utilize a 'one-stop shop' platform: a central system for community input with searchable data well organized by topic for use by all City department staff."9

#### **DETAILED COMMENTS AND RECOMMENDATIONS**

### I. Chapter 9: Implementation Actions and Programs

We appreciate that the Draft EJ Element contains a chapter and table dedicated to implementation. We also appreciate Chapter 9's Goal EJ-10 to "Prioritize Improvements and Programs That Meet the Needs of Environmental Justice Communities."

However, strong policies and goals are only as good as their implementation plans and actions. Oakland's Draft EJ Element includes sound visions and policies, but there must be advanced planning about *how* the various policies and actions will be implemented. This includes, but is not limited to, developing a comprehensive Goals, Policies and Actions table; creating or mapping out systems for interdepartmental coordination; robust fiscal planning; and establishing strong oversight and accountability mechanisms.

<sup>&</sup>lt;sup>8</sup> Environmental / Justice Solutions. "Racial Equity Impact Assessment City of Oakland General Plan Environmental Justice and Safety Elements." Public-Review-Draft\_-EJ\_Safety-Elements\_REIA\_3.23.23.Pdf. March 23, 2023. https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft\_-EJ\_Safety-Elements\_REIA\_3.23.23.pdf., 29

<sup>&</sup>lt;sup>9</sup> Ibid., 29-30

We offer the following recommendations for Chapter 9 to strengthen implementation, increase interdepartmental coordination, and foster trust and accountability.

## A. Section 9.1: Prioritizing Improvements and Programs that Meet the Needs of EJ Communities

- 1. Recommendation: Include a detailed overview of the EJ Element's Implementation Plan in Section 9.1. We recommend that the overview model the clarity and detail in the implementation chapter of <u>Santa Cruz's Climate Action Plan</u>. <sup>10</sup> Specifically, a detailed overview should include:
  - a) the responsible parties for overall implementation
  - b) the responsible parties' general roles and responsibilities as they relate to the implementation of the EJ Element
  - c) the City's plans for interdepartmental coordination
  - d) funding plans and forecasts for implementation
  - e) accountability plans for implementation

Although we recommend more detail and specificity than what Oakland's current Land Use and Transportation (LUTE) Element's Implementation section provides, the "Highlights of the Implementation Program" and "General Plan Administration" sections therein serve as another model and precedent for this recommendation.<sup>11</sup>

- 2. Recommendation: Develop and incorporate the following implementation workflow for City staff to facilitate stronger interdepartmental coordination and accountability:
  - a) Once the lead departments for General Plan implementation are established, designate a departmental liaison. This liaison will be responsible for coordinating their department's scope of work as it relates to implementing the General Plan. The liaison will also be responsible for developing an annual work plan for the department.
  - b) All departmental liaisons meet on a regular basis. The meeting should allocate time for updates on implementation and open-ended time for coordination and collaboration.
  - Departments annually present their work plans to city council, the General Plan community advisory and oversight committee(s), and the greater community at the City-wide Oakland Climate

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 <sup>10 &</sup>quot;City of Santa Cruz 2030 Climate Action Plan." 637983259409670000. Accessed June 21, 2023. <a href="https://www.cityofsantacruz.com/home/showpublisheddocument/90696/637983259409670000">https://www.cityofsantacruz.com/home/showpublisheddocument/90696/637983259409670000</a>., 133-138
 11 "Implementation Program." Oak035263.Pdf. March 1, 1998. <a href="https://oaklandca.s3.us-west-1.amazonaws.com/oakca1/groups/ceda/documents/webcontent/oak035263.pdf">https://oaklandca.s3.us-west-1.amazonaws.com/oakca1/groups/ceda/documents/webcontent/oak035263.pdf</a>.

- Action Network (OCAN) conference for accountability, participatory planning, and "budgetary considerations." <sup>12</sup>
- d) City council, department heads and decision-makers take each departments' General Plan work plans and community priorities into account during their budgeting process.<sup>13</sup>

#### B. Table EJ-11: Implementation - Goals, Policies, and Actions

- **1. Recommendation:** Clarify the specific timelines, responsibility roles, and priority levels for each Action in the Final EJ Element. Specifically, we recommend that the City:
  - a) Clearly define the "short," "medium," and "long" timelines, such as with year ranges or target completion years;
  - b) Clarify implementing departments' roles by assigning lead or primary department(s) and supporting or secondary department(s) in the "Responsibility" section;
  - c) Establish Action prioritization criteria;14 and
  - d) Specify the priority level for each Action

We recommend modeling <u>South San Francisco's 2040 General Plan Implementation Action Matrix</u> (see Image 1 on the next page).

<sup>&</sup>lt;sup>12</sup> Sanchez, Marye , Danielle Novokolsky, Nathan Otto, Danielle Knighten, and Kyle Elser. "Performance Audit of the City's Climate Action Plan." 21-009\_cap.Pdf. February 18, 2021. <a href="https://www.sandiego.gov/sites/default/files/21-009\_cap.pdf">https://www.sandiego.gov/sites/default/files/21-009\_cap.pdf</a>, 36

<sup>&</sup>lt;sup>13</sup> This implementation workflow is inspired by a workflow offered by the City of San Diego's Office of the City Auditor in a Performance Audit of the City's Climate Action Plan. We have offered an overview of the annual workflow above, and it is explained in more detail in the document. Ibid.

<sup>&</sup>lt;sup>14</sup> See Appendix C for Action Prioritization Criteria Recommendations

Image 1. Example of a detailed Implementation Action Matrix<sup>15</sup>

Chapter -	Implementation Action ÷	Priority ÷	Timeframe ÷	Primary Responsibility ÷	Secondary Responsibility ÷
Community Health and Environmental Justice	Action CHEJ-7.5.2: Provide landlord housing rights education. Provide education and outreach to landlords, property managers, real estate agents, and others on their obligations as they make or manage properties available for housing.	Medium	1-2 years	Economic Development and Housing Division (ECD)	
Community Health and Environmental Justice	Action CHEJ-7.5.1: Provide resident housing rights education. Provide education, outreach, and referral services for residents regarding their rights as tenants and buyers.	Medium	1-2 years	Economic Development and Housing Division (ECD)	
Community Health and Environmental Justice	Action CHEJ-7.2.1: Connect residents to mortgage assistance resources. Provide mortgage assistance to help low-income homeowners at risk of foreclosure with financial or counseling support. Provide residents with resources and connections to HEART of San Mateo County, a countywide homeowner assistance program, and other non-profit homeowner assistance programs.	Medium	1-2 years	Economic Development and Housing Division (ECD)	City Manager

2. Recommendation: Add cost estimates to each Action in Table EJ-11. Assigning cost estimates will facilitate longer-term fiscal planning and will give relevant departments and stakeholders more information to adequately budget for the effective implementation of the EJ Element. Oakland's Equitable Climate Action Plan (ECAP) provides an example of this (see Image 2 on the next page).

<sup>&</sup>lt;sup>15</sup> "Shape SSF 2040 General Plan Implementation Actions." Implementation Actions - Shape South San Francisco. Accessed June 21, 2023. <a href="https://shapessf.com/implementation-actions/">https://shapessf.com/implementation-actions/</a>.

**HOW TO READ THE ECAP** Action Reference Number Benefits This is shorthand used throughout the These are additional benefits to plan to refer to this Action. Oakland that this Action provides. Increased Resilience Improved Air Quality Section Name Improved Public Safety & Health This is an estimate of the cost to the N Potential Green Job Creation City to implement this Action. & Increased Mobility **\$** \$ \$ \$ \$0 - \$200,000 **\$\$ \$** \$200,001 - \$500,000 **\$\$\$** \$500, 001 - \$5,000,000 Section Logo **\$\$\$** \$5,000,001 - \$16,500,000 **Action Name ECAP Action** This language describes the specific details of this ECAP Action. ADAPTATION **Enhance Community Energy Resilience** Climate Benefit This is an estimate of how much this Action will reduce GHG reductions. 222 (W) ∠ ∠ Low Impact Medium Impact events for low-income, medically dependent of renewable energy and applications. High Impact

Image 2. Example of cost estimates in an Action Matrix<sup>16</sup>

- **3. Recommendation:** Prioritize and plan for funding the implementation of EJ Element Policies and Actions by:
  - a) Identifying potential funding sources for each Action in Table EJ-11; and
  - b) Connecting revenue sources and budget decisions to EJ Element objectives and policies.

The City of Santa Cruz's Implementation and Monitoring Plan for their Climate Action Plan provides a model for identifying potential funding tools in an implementation plan (see Image 3 on the next page). We recommend that the City of Oakland provide more specificity, such as by naming specific grants wherever possible. We also recommend that the City prioritize the most equitable funding sources – such as progressive revenue measures – for implementation wherever possible.

<sup>&</sup>lt;sup>16</sup> "Oakland 2030 Equitable Climate Action Plan." Oakland-ECAP-07-24.Pdf. July 24, 2020. https://cao-94612.s3.amazonaws.com/documents/Oakland-ECAP-07-24.pdf., 26

Image 3. Example of Identifying Potential Funding Tools (Column 4)<sup>17</sup>

ID	Action	Lead Dept.	Potential Funding Tool	Phase	Implementation Notes/Comments
			Grants (Competitive), Grants (Formula), Bonds		Implementation Memo, for additional detail.
Action T1.5	Build new infrastructure that provides equitable access to safe bicycle and pedestrian pathways throughout the City, prioritizing frontline neighborhoods.	Public Works	Taxes, Fees, Private, Assessment, Grants, Grants (Competitive), Grants (Formula), Bonds	3	See Appendix H, Funding and Financing Implementation Memo, for additional detail.
Action T1.6	Pilot Neighborhood Greenways to slow traffic and improve walking and bikir and evaluate piloting time based closures to vehicles primarily in business districts.	ng Planning, Public Works	Taxes, Fees, Private, Assessment, Grants, Grants (Competitive), Grants (Formula), Bonds	2-3	See Appendix H, Funding and Financing Implementation Memo, for additional detail.

Additionally, examples of connecting revenue sources and budget decisions to EJ Element objectives and policies include:

- Applying City-wide revenue from traffic and parking fees towards community-identified mobility improvements in Oakland's EJ Communities
- Following the <u>City of Alameda's example</u><sup>18</sup> and consulting with Sogorea Te' Land Trust to establish an annual payment of <u>Shuumi</u> Land Tax.<sup>19</sup>
- The additional strategies we detail in our comments on Goal EJ-8<sup>20</sup>

## C. Policy EJ-10.2 & Action EJ-A.34: Implementation Monitoring and Evaluation Plan

We are supportive of Policy EJ-10.2 to develop an Implementation Monitoring and Evaluation Plan and Action EJ-A.34 to develop the framework and reporting mechanisms for that plan in partnership with community groups. We offer the following recommendations and resources as a potential guide for the evaluation process,<sup>21</sup> but we ultimately defer to what the community collaboratively decides is best.

 Recommendation: The City should track the implementation status of the EJ Element and provide open access to progress updates in a way that's accessible, easy to understand, regularly updated, and easy to navigate. The West Oakland Environmental Indicator Project (WOEIP)'s

<sup>&</sup>lt;sup>17</sup> "City of Santa Cruz 2030 Climate Action Plan." 637983259409670000. Accessed June 21, 2023. https://www.cityofsantacruz.com/home/showpublisheddocument/90696/637983259409670000., 353

<sup>&</sup>lt;sup>18</sup> "Sogorea Te' Land Trust Shuumi Land Tax." Sogorea Te' Land Trust Shuumi Land Tax. Accessed June 21, 2023. https://www.alamedaca.gov/RESIDENTS/Information-for-Residents/Sogorea-Te%E2%80%99-Land-Trust-Shuumi-Land-Tax.

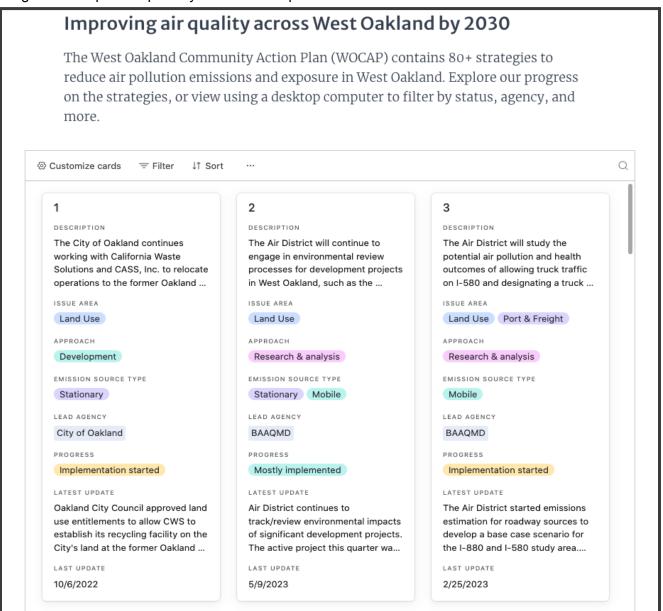
<sup>&</sup>lt;sup>19</sup> "The Shuumi Land Tax "directly supports Sogorea Te's work of rematriation, returning Indigenous lands to Indigenous people, establishing a cemetery to reinter stolen Ohlone ancestral remains and building urban gardens, community centers, and ceremonial spaces so current and future generations of Indigenous people can thrive in the Bay Area." <a href="https://sogoreate-landtrust.org/shuumi-land-tax/">https://sogoreate-landtrust.org/shuumi-land-tax/</a>

<sup>&</sup>lt;sup>20</sup> See pages 12-18

<sup>&</sup>lt;sup>21</sup> See Appendix D for Evaluation Process Resources

West Oakland Community Plan (WOCAP) implementation tracker provides a model for this (see Image 4 below).

Image 4. Example of a publicly accessible implementation tracker<sup>22</sup>



**2. Recommendation:** The City allocate funding for, and hire a trusted third-party evaluator to annually review the implementation of the EJ Element in partnership with EJ Communities.

<sup>&</sup>lt;sup>22</sup> "WOCAP Strategies Improving Air Quality across West Oakland by 2030." WOCAP Strategies - West Oakland Environmental Indicators Project. Accessed June 21, 2023. https://woeip.org/featured-work/owning-our-air/wocap-strategies/.

# II. Goal EJ-8: Foster Meaningful Civic Engagement and Support Community Power and Capacity-Building

We support the Draft EJ Element Policies under Goal EJ-8 and commend the City for including many of the essential components for meaningful civic engagement, such as access, relevant and innovative methods, community partnership and capacity building. We also support the City's partnership with the <u>Deeply Rooted Collaborative</u> and the Collaborative's <u>ongoing and thoughtful engagement</u> with Oakland residents about the General Plan Update.<sup>23</sup>

However, we strongly urge the City to adopt the following recommendations to ensure that Goal EJ-8's Policies and Actions effectively support implementation. We also find it concerning that all three of Goal EJ-8's corresponding Actions are classified as "long." As Policy EJ-8.2 (Sustained Engagement) suggests, community engagement is not a one-and-done process to check off a list after completing a workshop. Community engagement is an ongoing process and essential ingredient for the creation, implementation and evaluation of meaningful policies, plans and programs. Only with EJ community members' leadership, expertise, and capacity can transformative solutions be brought to bear.

We offer the following comments, general recommendations, Policy amendments, and new Policies and Actions for Goal EJ-8 to support an EJ Element implementation process that includes ongoing, meaningful and accessible community engagement.

	GOAL EJ-8 POLICY RECOMMENDATIONS				
Policy	licy Comments Existing Policy Amendments [in red] New Policy Proposals [in green]:				
Policy EJ-8.1	We support the language in Policy EJ-8.1. Our proposed amendment captures the fact that meaningful and relevant engagement should be developed in partnership with EJ Communities and be an integral part of every stage of plans located in, impacting and/or benefitting Oakland's EJ Communities.	Meaningful, Relevant Engagement. Design and implement public engagement processes and events <i>in partnership with EJ Communities</i> that emphasize participation from low-income communities and communities of color; that are driven by resident priorities, that are easily accessible <sup>24</sup> and understandable and that provide meaningful opportunities for participants to influence outcomes <i>during the planning</i> , <i>implementation</i> , <i>and evaluation phases of the policy</i> , <i>project and/or program process</i> .			

<sup>&</sup>lt;sup>23</sup> "Deeply Rooted Community Outreach." COMMUNITY OUTREACH | Deeply Rooted. Accessed June 21, 2023. https://www.deeplyrooted510.org/communityoutreach.

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<sup>&</sup>lt;sup>24</sup> See Appendix A for Accessibility Recommendations

## Policy EJ-8.5

The proposed amendment to Policy EJ-8.5 (Community Capacity Building) is adapted from San Diego County's EJ Element Policy EJ-15.3 (Capacity Building and Support) to better align with our shared definition of capacity building.25 While we appreciate Policy EJ-8.5's language around empowering community members "to participate in local decision-making and engage meaningfully in planning efforts,"26 we value that San Diego County's policy articulates an intention to support EJ communities' capacity to advance visions and work that may fall outside of the City's decision-making and planning efforts.

Examples of this include but are not limited to:

- WOEIP's <u>Oakland Shoreline</u> <u>Leadership Academy</u>;<sup>27</sup>
- Mycelium Youth Network's
   <u>Climate Resilient Schools</u> and
   <u>Youth Leadership Council</u>
   programs;<sup>28</sup>
- East Oakland Neighborhoods Initiative (EONI)'s continued community planning efforts outside of the <u>Transformative</u>

Community Capacity Building. Empower historically marginalized community members to participate in local decision-making and. engage meaningfully in planning efforts, advocate for "community and systems improvements...[,] develop their skill sets as community leaders, and advance...their roles as trusted messengers [and decision-makers]."32 including through—This includes, but is not *limited to*, increased representation in employment and civic life; providing educational/ training workshops and programs about civic involvement and processes, such as through academies, fellowships and internships; providing organizational support to community-based organizations; and other capacity building activities.

<sup>&</sup>lt;sup>25</sup> We define capacity building as the process of strengthening local leadership, skills, expertise and resources so that communities can meet their needs and achieve self-determination. Against a backdrop of systemic disinvestment and oppression, we must invest in the capacity of local leaders to advance community visions. This work includes uplifting community knowledge, building skills, developing partnerships, identifying and planning for projects, and shifting resources and power.

<sup>&</sup>lt;sup>26</sup> Dyett & Bhatia, E/J Solutions, and PolicyLink. "Oakland 2045 Oakland Environmental Justice Element Public Review Draft March 2023." EJ-Element\_032123-public-review-draft\_reduced.Pdf. March 24, 2023. <a href="https://cao-94612.s3.amazonaws.com/documents/EJ-Element\_032123-public-review-draft\_reduced.pdf">https://cao-94612.s3.amazonaws.com/documents/EJ-Element\_032123-public-review-draft\_reduced.pdf</a>, 9-13

<sup>&</sup>lt;sup>27</sup> "Oakland Shoreline Leadership Academy." Oakland Shoreline Leadership Academy - West Oakland Environmental Indicators Project. Accessed June 21, 2023. https://woeip.org/featured-work/oakland-shoreline-leadership-academy/.

<sup>&</sup>lt;sup>28</sup> "Ćlimate Resilient Schools Initiative." Climate Resilient Schools | Mycelium Youth Network. Accessed June 21, 2023. <a href="https://www.myceliumyouthnetwork.org/climate-resilient-schools">https://www.myceliumyouthnetwork.org/climate-resilient-schools</a>; "Youth Leadership Council (YLC)." Youth Leadership Council | Mycelium Youth Network. Accessed June 21, 2023. <a href="https://www.myceliumyouthnetwork.org/youth-leadership-council">https://www.myceliumyouthnetwork.org/youth-leadership-council</a>.

<sup>&</sup>lt;sup>32</sup> This policy was adapted from Policy EJ-15.3 in San Diego County's Environmental Justice Element. "Chapter 9 Environmental Justice." 09 Environmental Justice. Accessed June 21, 2023.

https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/09-Environmental-Justice-Aug2021.pdf, 9-51

Climate Communities (TCC) project;29

- Sogorea Te' Land Trust's Himmetka (community resilience center) program;30 and
- Homies Empowerment's Freedom Farm 31

## **NEW Policy** #1

This proposed policy supplements Policies EJ-8.2 (Sustained Engagement) and EJ-8.4 (Community Partners) by naming the processes through which the City will support community-led initiatives. While both existing Policies are important, this proposed policy differs from Policy EJ-8.4 because it focuses on how the City can partner with the community to advance community-driven initiatives, while Policy EJ-8.4 focuses on how the City can partner with community-based organizations for City-driven initiatives.

Examples of this include, but are not limited to:

The City partnering with the East Oakland Neighborhoods Initiative (EONI) to apply for and win a Transformative Climate Communities (TCC) grant.

Community-Led Initiatives. Support community-driven initiatives that address priorities and needs related to the 10 EJ Element goals through funding, technical assistance, support with grant applications, "data sources, meeting spaces, support services, and other staff resources"33

<sup>&</sup>lt;sup>29</sup> "Better Neighborhoods, Same Neighbors! East Oakland Neighborhoods Initiative EONI Community Plan." FINAL-PRINTED-EONI-PLAN.Pdf. Accessed June 21, 2023.

https://cao-94612.s3.amazonaws.com/documents/FINAL-PRINTED-EONI-PLAN.pdf; "Transformative Climate Communities (TCC) Grant - Better Neighborhoods, Same Neighbors. "City of Oakland | Transformative Climate Communities (TCC) Grant. Accessed June 21, 2023. https://www.oaklandca.gov/topics/transformative-climate-communities-tcc-grant.

<sup>30 &</sup>quot;Himmetka: In One Place, Together." Himmetka: In One Place, Together - The Sogorea Te Land Trust. Accessed June 21, 2023. https://sogoreate-landtrust.org/himmetka/.
31 "Freedom Farm." Freedom Farm - HOMIES EMPOWERMENT. Accessed June 21, 2023.

https://www.homiesempowerment.com/freedom-farm.html.

33 This policy was adapted from Policy EJ-14.2 in San Diego County's Environmental Justice Element. "Chapter 9 Environmental Justice." 09 Environmental Justice. Accessed June 21, 2023. https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/09-Environmental-Justice-Aug2021.pdf., 9-50

Hub.  The City following through on Communities for a Better Environment (CBE)'s request to apply for air filter funding.
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	GOAL EJ-8 ACTION RECOMMENDATIONS				
Action	Comments	Existing Action Amendments [in red] & New Action Proposals [in green]			
EJ-A.32	The OCAN provides the necessary infrastructure for the City to implement many of the existing and/or proposed policies and actions within Goal EJ-8. The structure of the OCAN—which is summarized in Oakland's 2030  Equitable Climate Action Plan (ECAP) and detailed in the ECAP's Racial Equity Impact Assessment and Implementation Guide (REIA)—calls for and details strategies to:  Increase the City's capacity to practice interdepartmental coordination and meaningfully partner with Oakland CBOs and residents (related to Policies EJ-8.2, 8.6 and 8.7)  Establish local, issue-based implementation committees	Implement the City's roles and responsibilities as they relate to the establishment of the Oakland Climate Action Network (OCAN), a permanent neighborhood organizing support network summarized in Action CL-5 of Oakland's 2030 Equitable Climate Action Plan (ECAP) and detailed in the ECAP's Racial Equity Impact Assessment and Implementation Guide (REIA). This includes—but it not limited to—designating staff within each implementing department to be the/a community engagement partner and interdepartmental liaison; engaging with "neighborhood-based governance bodies" (i.e. OCAN committees); and hostingHost-an annual City-wide OCAN conference-of Neighborhood Empowerment Councils, where councils—community organizations, neighborhood councils, and residents plan proactively for healthy communities and provide feedback on General Plan implementation. 36			

<sup>&</sup>lt;sup>35</sup>Tobias, Marybelle Nzegwu, Colin Miller, David Jaber, and Sooji Yang. "2030 Equitable Climate Action Plan Racial Equity Impact Assessment & Implementation Guide." FINAL\_Complete\_EF-Racial-Equity-Impact-Assessment\_7.3.2020\_v2.Pdf. July 3, 2020. <a href="https://cao-94612.s3.amazonaws.com/documents/FINAL\_Complete\_EF-Racial-Equity-Impact-Assessment\_7.3.2020\_v2.pdf">https://cao-94612.s3.amazonaws.com/documents/FINAL\_Complete\_EF-Racial-Equity-Impact-Assessment\_7.3.2020\_v2.pdf</a>, 23 See Appendix F for more details about the Oakland Climate Action Network (OCAN)

(related to Policies EJ-8.1, 8.3 and 8.5 and Action EJ-A.32)<sup>34</sup>

The City staff member(s) assigned to serve as the community engagement partner(s) should be clearly communicated to residents and an accessible point person(s) for questions and feedback. We recommend the assigned City staff member(s) have sufficient understanding of and authority over the relevant issue areas so that residents' questions and feedback are addressed in a meaningful way.

## NEW Action #1

We appreciate Policy EJ-8.4 (Community Partners), Policy EJ-8.6 (Engagement Infrastructure) and Action EJ-A.30's mention of funding for meaningful community engagement. We also acknowledge EJ-A.30 as one of many necessary steps to resource the City's community engagement strategy. However, we strongly recommend that the City adopt this proposed Action and do more to address the urgency of funding an ongoing, accessible and meaningful community engagement process.

The Final EJ Element must offer other funding sources to effectively implement the proposed community engagement strategy. As currently written, EJ-A.30's timeline is classified as "long" and only commits to studying the feasibility of establishing a Citywide community engagement

Actively seek federal, state and philanthropic funding,<sup>37</sup> in partnership with EJ communities and develop proposals in alignment with community goals. Reevaluate departmental budgets within all City departments' budgets to support ongoing, meaningful and accessible community engagement for EJ Communities.<sup>38</sup>

<sup>&</sup>lt;sup>34</sup> See Appendix F for more details about the Oakland Climate Action Network (OCAN)

<sup>&</sup>lt;sup>37</sup> Such as programs funded through the Infrastructure Investment and Jobs Act (IIJA) and the Inflation Reduction Act (IRA)

<sup>&</sup>lt;sup>38</sup> See Appendix B for Community Engagement Budgeting Recommendations

	fund. Further, we recommend that departmental budgets be finalized in partnership with EJ Communities and that relevant information and updates be transparently shared.  As mentioned earlier, community engagement is an essential ingredient to create, implement and evaluate meaningful policies, plans and programs that are within or informed by Oakland's 2045 General Plan Update.	
NEW Action #2	This proposed action supports and provides tangible strategies for Policies EJ-8.1 (Meaningful, Relevant Engagement), EJ-8.3 (Innovative Methods) and EJ-8.4 (Community Partners). Popular education campaigns can also help the City spread more awareness about important City services and support Oakland residents to enroll in and take advantage of those services.	"Provide popular education about rights and resources to all community members.  Educational campaigns are a too infrequently used approach for bringing Oaklanders together around shared goals across socioeconomic and racial/ethnic lines. City efforts to increase access to resources for the most vulnerable residents should utilize paid partnerships with CBOS [community-based organizations] to develop and deploy community-based campaigns.  Popular education carried out through Oakland resident leadership can help the City meet residents where they are, overcome barriers to understanding, pay respect to existing community knowledge and lived experience, and ensure that everyone has the ability to participate equitably in creating and sharing knowledge."39
NEW Action #3	This proposed action corresponds to and supports the new Community-Led Initiatives Policy proposal detailed in the Policy Recommendation table above (New Policy #1).	Integrate community-led and community-driven initiatives into City planning processes, such as other General Plan elements, future action and area plans, the Capital Improvement Program (CIP) process, the adopted City budget, bond measures, and other City investments and resource allocations.

<sup>&</sup>lt;sup>39</sup> Environmental / Justice Solutions. "Racial Equity Impact Assessment City of Oakland General Plan Environmental Justice and Safety Elements." Public-Review-Draft\_-EJ\_Safety-Elements\_REIA\_3.23.23.Pdf. March 23, 2023. <a href="https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft">https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft\_-EJ\_Safety-Elements\_REIA\_3.23.23.pdf.</a>, 29

## NEW Action #4

This proposed action supports Policy EJ-8.6 (Engagement Infrastructure). Establishing paid community advisory and oversight committees and boards provides a sustained and consistent engagement structure for community leaders to meaningfully engage in and have ownership over the decision-making process.<sup>40</sup> These bodies also support the necessary bridge-building work between local government and the Oakland community.

advisory and oversight committee or board to support an equitable and community-driven implementation of Oakland's Environmental Justice Element or overall General Plan. The advisory body should represent Oakland's EJ Communities and diversity, have lived and technical experience in the relevant topic areas, and be adequately compensated, trained, and supported to engage in the City's feedback channels.

Establish or leverage a paid community

In addition to adopting this action, we recommend that the City continue partnering with <u>Deeply Rooted's</u>
<u>Equity Working Group</u> or another similar paid community advisory body throughout the General Plan's implementation process.

## NEW Action #5

This proposed action supports
Policies EJ-8.2 (Sustained
Engagement), EJ-8.6 (Engagement
Infrastructure) and EJ-8.7
(Interagency and Interdepartmental
Collaboration).

As detailed in the REIA for Oakland's EJ and Safety Elements, "[i]mproved data gathering and assessment will improve civic engagement by reducing City blind spots, redundancy, and resident planning fatigue caused by repeated requests for input."41

"Improve Citywide community engagement information gathering and sharing practices. Rather than having each City department collect and refer to community input in silos, develop and utilize a 'one-stop shop' platform: a central system for community input with searchable data well organized by topic for use by all City department staff."<sup>42</sup>

<sup>&</sup>lt;sup>40</sup> See Appendix E for Community Advisory Board and Committee Recommendations

<sup>&</sup>lt;sup>41</sup> Environmental / Justice Solutions. "Racial Equity Impact Assessment City of Oakland General Plan Environmental Justice and Safety Elements." Public-Review-Draft\_-EJ\_Safety-Elements\_REIA\_3.23.23.Pdf. March 23, 2023. <a href="https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft\_-EJ\_Safety-Elements\_REIA\_3.23.23.pdf">https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft\_-EJ\_Safety-Elements\_REIA\_3.23.23.pdf</a>, pg. 29-30
<sup>42</sup> Ihird

#### III. Conclusion

Thank you for the opportunity to offer comments on Oakland's Draft Environmental Justice Element. We urge the General Plan Update team, the Planning Department, the Planning Commission, and City officials to incorporate the recommendations outlined above into the Final Environmental Justice Element. We also urge the City to continue engaging, supporting, and partnering with Oakland's Environmental Justice organizations and communities to ensure that the Final EJ Element and implementation process is reflective of their needs and lends to material benefits in their lives and communities.

Please do not hesitate to reach out to Aminah Luqman at <a href="mailto:aminah.luqman@greenlining.org">aminah.luqman@greenlining.org</a> with any questions or to schedule time to discuss our recommendations further.

Sincerely,

Aminah Lugman

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Homies Empowerment Leadership Team, Homies Empowerment

#### **APPENDIX A**

#### Accessibility Recommendations

In addition to Policy EJ-8.10 (Linguistically Isolated Communities) and Policy EJ-8.11 (Digital Access), we recommend that the City incorporate the following strategies for accessibility:

- Create and/or maintain "a list of access support vendors (i.e. CART [Communication Access Realtime Translation] and ASL [American Sign Language] interpreters, people to do access audits, web designers who practice accessible design,<sup>43</sup> chemical-safe cleaners, caterers who cook for specific food access needs)" and contract with these vendors to support accessible events and City processes<sup>44</sup>
- Plan for meeting times and locations that are accessible and work best for the intended audience
- Disseminate relevant materials and agendas far enough in advance of meetings or events to give participants enough time to review
- Include access information in promotion materials (e.g. indicating that ASL interpreters will be provided) and solicit access requests in advance
- Provide childcare to help caretakers and community members with children attend and participate
- Provide transportation and/or transportation stipends
- Communicate in plain, easy-to-understand language and avoid jargon and acronyms
- Incorporate graphics, clear visual aids and storytelling to convey information
- Use microphones to ensure all attendees can hear and receive the information being presented and discussed

<sup>&</sup>lt;sup>43</sup> Education and Outreach Working Group (EOWG), and Shawn Lawton Henry. "Introduction to Web Accessibility." Introduction to Web Accessibility | Web Accessibility Initiative WAI. Accessed June 21, 2023. https://www.w3.org/WAI/fundamentals/accessibility-intro/.

<sup>&</sup>lt;sup>44</sup> Piepzna-Samarasinha, Leah Lakshmi, and Stacey Park Milbern. "Disability Justice: An Audit Tool." Disability Justice: An Audit Tool. Accessed June 21, 2023.

https://static1.squarespace.com/static/5ed94da22956b942e1d51e12/t/625877951e18163c703bd0f4/1649964964772/DJ+Audit+Tool\_pdf., 19

#### **APPENDIX B**

#### Community Engagement Budgeting Recommendations

In addition to our proposed New EJ-8 Action #1 regarding funding, we offer the following recommendations around adequate budgeting to support a meaningful community engagement process. In addition to allocating adequate time and staff resources, the City must budget to support the other necessary resources for community engagement. This includes, but is not limited to, funding and/or resource allocation for community stipends, contracts and/or partnership agreements for community-based organizations ("CBOs"), interpretation and translation, third-party facilitators and mediators, event space, material development, childcare, food, transportation, and communications equipment.

For community stipends and CBO contracts, we recommend that the City fully fund stipends for residents and CBOs in EJ communities to participate in formal advisory and feedback channels. Given the significant time required to engage in public stakeholder processes, capacity challenges these residents and organizations face, and the value of incorporating the wisdom of their lived experiences into the design of policies and plans that will affect their lives and neighborhoods, the City should compensate community expertise on par with compensation offered for other types of expert consultants, starting at a minimum rate of \$100 per hour.

The West Oakland Community Action Plan (WOCAP)—which serves as a strong local example for community-driven planning—also articulates the importance of sufficient time for participatory planning and funding for community outreach, material development and food.<sup>45</sup> In the plan, they reflect that childcare and transportation would have helped members attend meetings more regularly. They also articulate the importance of having neutral and trusted facilitators during a participatory planning process because they "fostered inclusivity and full participation by community members…encourage[d] public comments throughout the planning process…[and] guided the Steering Committee toward consensus on Plan elements and Strategies at critical points during the Plan's development."<sup>46</sup>

We recommend that the funding to support community engagement for EJ Communities be adequate to:

- Contract and appropriately compensate CBOs to lead or partner on community engagement
- Provide paid stipends to EJ Community residents and environmental justice CBOs to participate in advisory and feedback channels around related policies, actions and plans
- Provide language interpretation (which includes ASL) for virtual and in-person events and live captioning for virtual events
- Support material development and the translation of said materials into the prominent languages spoken in Oakland and within Oakland's EJ Communities

<sup>&</sup>lt;sup>45</sup>"Owning Our Air The West Oakland Community Action Plan - Volume 1: The Plan." WOEIP-research-Owning-Our-Air-full.Pdf. Accessed June 21, 2023. <a href="https://woeip.org/wp-content/uploads/2020/11/WOEIP-research-Owning-Our-Air-full.pdf">https://woeip.org/wp-content/uploads/2020/11/WOEIP-research-Owning-Our-Air-full.pdf</a>., 3-3 - 3-5 <sup>46</sup> Ibid., 3-4

- Support the provision of childcare services and transportation stipends
- Support the provision of food during meal-time meetings (e.g. offering dinner during evening meetings from 6-8pm)
- Hire third-party facilitators and mediators to address power imbalances, elicit community feedback and solutions, and support consensus-building
- Provide accessible event spaces

Committing to and working to actualize the proposed action around funding will help provide the conditions necessary to achieve the meaningful engagement, community partnerships, community capacity building, and language and digital access, as articulated in Policies EJ-8.1, EJ-8.4, EJ-8.10, EJ-8.11.

#### APPENDIX C

#### Action Prioritization Criteria

We recommended above that the Final EJ Element include more details in Table EJ-11 to improve implementation, including establishing prioritization levels for each Action. To implement this recommendation, we recommend that the City establish equitable prioritization criteria in partnership with EJ community groups and organizations to determine and assign priority level for each EJ Action. We've included a few sources below with example criteria for the City's consideration:

- Oakland's Racial Equity Impact Assessment and Implementation Guide (REIA) for the EJ and Safety Elements
  - The REIA includes Detailed Equity Recommendations for the EJ Element's policies and actions (pgs. 34-78) as well as a series of assessment questions (pgs. 32-33) related to the following topics:
    - Resource creation and/or dedication "to address the environmental justice, health, and safety needs of low-income and BIPOC residents of EJ Communities"<sup>47</sup>
    - Accountability, transparency and follow-through to EJ Community residents
    - Participatory decision-making by and codevelopment of solutions with impacted community members
    - Reduction of public health, safety and environmental disparities
    - Preservation or strengthening of local assets and alignment with "broadly shared community values in low-income, BIPOC EJ Communities" 48
- The Equity Screening Tool criteria in Santa Cruz's Climate Action Plan (pg. 49-53)
  - Santa Cruz' Climate Action Plan includes an equity screening tool that Climate Action Plan actions were evaluated against. The screening tool was developed by the City of Santa Cruz's Community Climate Action Task Force (CATF) in partnership with "equity advisors from nearly a dozen frontline groups and small group conversations with frontline communities."
  - For the evaluation process, the City and CATF "evaluated each of the CAP actions against all criteria categories and questions and assigned a score of

<sup>&</sup>lt;sup>47</sup> Environmental / Justice Solutions. "Racial Equity Impact Assessment City of Oakland General Plan Environmental Justice and Safety Elements." Public-Review-Draft\_-EJ\_Safety-Elements\_REIA\_3.23.23.Pdf. March 23, 2023. <a href="https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft">https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft\_-EJ\_Safety-Elements\_REIA\_3.23.23.pdf</a>., 32 

<sup>48</sup> Ibid.. 33

<sup>&</sup>lt;sup>49</sup> "City of Santa Cruz 2030 Climate Action Plan." 637983259409670000. Accessed June 21, 2023. https://www.cityofsantacruz.com/home/showpublisheddocument/90696/637983259409670000., 49

positive impact, negative impact, neutral or not applicable. No negative scores were accepted."50

- The screening criteria is grouped into the following categories:
  - Community Health and Safety
  - Green Job Facilitation and Creation
  - Cultural Vibrancy
  - Accessibility
  - Accountability
  - Affordability
- The Oakland Climate Action Coalition (OCAC)'s Equity Checklist for the Priority Conservation Area (PCA) Selection Process<sup>51</sup>
  - The OCAC's Equity Checklist includes the following criteria and characteristics:

Economic Equity	Social Inclusion	Good Health for All	
<ul> <li>→ Workforce development training and employment</li> <li>→ Benefits to residents of low-income housing</li> <li>→ Support to Community Land Trusts (CLTs)</li> <li>→ Anti-displacement protections</li> <li>→ Direct benefits to EJ Communities</li> </ul>	<ul> <li>→ Includes leadership by and meaningful participation from members of frontline communities and other impacted communities (e.g. communities of color, people with disabilities, youth, and the LGBTQIA+ community)</li> <li>→ Accommodation of disabilities</li> <li>→ Improved mobility</li> <li>→ Popular education</li> <li>→ Resident engagement and decision making</li> </ul>	<ul> <li>→ Mitigation of development impacts and improvement of quality of life</li> <li>→ Buffers from harmful infrastructure and activity</li> <li>→ Placemaking</li> <li>→ Creation of a healthy and pleasant local environment</li> </ul>	

https://www.cityofsantacruz.com/home/showpublisheddocument/90696/637983259409670000., 50 51 "Equity Checklist for the PCA Selection Process Working Draft." Equity Checklist\_6\_19\_15. June 19, 2015. http://oaklandclimateaction.org/wp-content/uploads/2015/06/Equity-Checklist 6 19 15.pdf.

<sup>&</sup>lt;sup>50</sup> "City of Santa Cruz 2030 Climate Action Plan." 637983259409670000. Accessed June 21, 2023.

#### APPENDIX D

#### **Evaluation Process Resources**

To strengthen Policy EJ-10.2 (Implementation Monitoring and Evaluation Plan) and the corresponding Action EJ-A.34 to develop the framework and reporting mechanisms for that plan in partnership with community groups, we offer the following resources for consideration in the design of the evaluation process and questions:

- Oakland's Racial Equity Impact Assessment and Implementation Guide (REIA) for the EJ and Safety Elements
  - The REIA's series of assessment questions (pgs. 32-33) related to resource creation and dedication; accountability; codevelopment of solutions; disparity reduction; and local assets could serve as a guide for the evaluation process.
  - The REIA offers the following overarching questions:
    - "Do the EJ Goal and relevant action(s) create and/or dedicate resources to address the environmental justice, health, and safety needs of low-income and BIPOC residents of EJ Communities, and thereby bridge equity gaps?"<sup>52</sup>
    - "Do the EJ Goal and relevant action(s) create a framework for ongoing accountability to EJ Community residents, transparency, and follow-through?"<sup>53</sup>
    - "Do the EJ Goal and relevant action(s) commit to co-developing solutions with impacted community members?"<sup>54</sup>
    - "Do the EJ Goal and relevant action(s) reduce public health, safety, and environmental disparities?"<sup>55</sup>
    - "Do the EJ Goal and relevant action(s) preserve or strengthen local assets and align with broadly shared community values in low-income, BIPOC EJ Communities?" 56

Environmental / Justice Solutions. "Racial Equity Impact Assessment City of Oakland General Plan Environmental Justice and Safety Elements." Public-Review-Draft\_-EJ\_Safety-Elements\_REIA\_3.23.23.Pdf. March 23, 2023.
 <a href="https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft">https://cao-94612.s3.amazonaws.com/documents/Public-Review-Draft</a> -EJ\_Safety-Elements\_REIA\_3.23.23.pdf., 32
 Ibid.

<sup>54</sup> Ibid.

<sup>&</sup>lt;sup>55</sup> Ibid., 33

<sup>&</sup>lt;sup>56</sup> Ibid.

- The Innovation Network's Learning and Evaluation Process<sup>57</sup>
  - The Innovation Network, a learning and evaluation partner for the Greenlining Institute, has a practice that consists of the following components:<sup>58</sup>
    - Evaluation of Complex Systems: Focusing on evaluation that measures hard-to-measure concepts such as trust, equity, and shared power through both qualitative and quantitative data. In their practice, they facilitate the development of "learning questions," which are intended to be forward-looking and to guide the learning together.
    - Participatory Planning: Designing their projects through participatory planning, involving stakeholders in all aspects of the evaluation lifecycle (evaluation planning, data collection, analysis and reflection, and reporting). Identifying what they are trying to achieve, how they plan to achieve it, and how the learning plan supports those goals at the outset provides the opportunity to reflect critically on their goals and intended impact, and then to check in on that progress on a regular basis.
    - Qualitative and Quantitative Data Collection: Collecting both qualitative and quantitative data to capture a variety of perspectives and help answer the learning questions. For example, data can be collected in real time through regular reflection meetings and surveys.
    - Learning Tied to Strategy Development and Implementation:
      Importantly, this work is framed as a "learning partnership" and not merely as an evaluation. In practice, learnings are directly connected to ongoing strategy development and support the facilitation team to adjust in implementation. Monthly and quarterly check-ins, plus an annual review, provides opportunities to reflect on learnings and course correct where needed. Check-ins and qualitative data can provide rich and nuanced insights to groundtruth whether policies are meeting their assumptions and intended impact.
- The Greenlining Institute's <u>Guidebook on Making Equity Real in Climate Adaptation and Community Resilience Policies and Programs</u><sup>59</sup>
  - The Guidebook recommends that evaluation guidelines for policies should:
    - "Develop policy-specific social equity metrics for processes and outcomes. Evaluating both process and outcome will create accountability to ensure social equity is centered and achieved in the implementation of

<sup>&</sup>lt;sup>57</sup> "Innovation Network Transforming Evaluation for Social Change." Innovation Network | Transforming Evaluation for Social Change. Accessed June 21, 2023. <a href="https://www.innonet.org/">https://www.innonet.org/</a>.

<sup>&</sup>lt;sup>58</sup> See pages 10-13 for more information on, as well as examples of, the Innovation Network's Learning and Evaluation process <a href="https://greenlining.org/wp-content/uploads/2023/06/Greenlinings-Regional-Climate-Collaboratives-RCC-Program-Guidelines-Round-1-Public-Comments-2022.pdf">https://greenlining.org/wp-content/uploads/2023/06/Greenlinings-Regional-Climate-Collaboratives-RCC-Program-Guidelines-Round-1-Public-Comments-2022.pdf</a>

<sup>&</sup>lt;sup>59</sup> Mohnot, Sona, Jordyn Bishop, and Alvaro Sanchez. "Making Equity Real In Climate Adaptation and Community Resilience Policies and Programs: A Guidebook." Microsoft Word - GL\_R4\_ClimateAdaptationReport\_Final\_081619.Docx. August 16, 2019. https://greenlining.org/wp-content/uploads/2019/08/Making-Equity-Real-in-Climate-Adaption-and-Community-Resilience-Policies-and-Programs-A-Guidebook-1.pdf.

the policy. Policymakers should engage equity stakeholders to define the metrics.

- ...[I]dentify and measure progress on economic, social, health, and environmental issues applicable to policy
  - Process metrics can include number of CBO representatives sitting on decisionmaking entities, did community engagement processes change course of projects, was trust built in the process, etc.<sup>60</sup>
  - Outcome metrics can include amount of GHG reduction, the percentage increase of urban tree canopy in a community, etc.
- Conduct regular process and outcome evaluations throughout implementation process
- Integrate community-recommended equity metrics into evaluation guidelines and include indicators that reflect current equity concerns (e.g. race, housing, etc.).
- Create an adaptive process and outcome metrics that reflect the changing equity landscape and develop processes that allow for funding streams to be adapted to current conditions.
- Present findings on the evaluation process to equity stakeholders and develop recommendations to improve [the] process. 61"62

<sup>61</sup> Adapted from Carter, V., Pastor, M. & Wander, M. (2018). Measures Matter. Retrieved from <a href="https://dornsife.usc.edu/assets/sites/242/docs/M">https://dornsife.usc.edu/assets/sites/242/docs/M</a> A Final WebVersion reduced.pdf on April 30, 2019.

<sup>&</sup>lt;sup>60</sup> Carter, V., Pastor, M. & Wander, M. (2018). Measures Matter. Retrieved from <a href="https://dornsife.usc.edu/assets/sites/242/docs/M">https://dornsife.usc.edu/assets/sites/242/docs/M</a> A Final WebVersion reduced.pdf on April 30, 2019.

<sup>62</sup> Mohnot, Sona, Jordyn Bishop, and Alvaro Sanchez. "Making Equity Real In Climate Adaptation and Community Resilience Policies and Programs: A Guidebook." Microsoft Word - GL\_R4\_ClimateAdaptationReport\_Final\_081619.Docx. August 16, 2019. https://greenlining.org/wp-content/uploads/2019/08/Making-Equity-Real-in-Climate-Adaption-and-Community-Resilience-Policies-and-Programs-A-Guidebook-1.pdf., 73

#### **APPENDIX E**

#### Community Advisory Board and Committee Recommendations

In addition to adopting proposed New EJ-8 Action #4 around establishing a paid community advisory board or committee to support implementation, we strongly recommend:

- Establishing membership criteria to ensure representation of Oakland's EJ Communities.
   The <u>evaluation criteria</u> for membership in Deeply Rooted's Equity Working Group (EWG) is an example of this.<sup>63</sup>
- Compensating members and ensuring that compensation is on par with compensation offered for other types of expert consultants, such as technical consultants.
- Providing members with adequate training and capacity building support to meaningfully participate in and inform the decision making process
- Establishing clear roles and responsibilities, potentially through a MOU or partnership agreement
- Ensuring that the body "maintains sufficient authority and independence so that they can influence final decisions"<sup>64</sup>

<sup>&</sup>lt;sup>63</sup> "Equity Working Group (EWG)." EQUITY WORKING GROUP | Deeply Rooted. Accessed June 21, 2023. https://www.deeplyrooted510.org/ewg.

<sup>&</sup>lt;sup>64</sup> Eng, Tiffany, Adeyinka Glover, Jazmine Johnson, Dan Sakaguchi, and Chelsea Tu. "Rethinking Local Control in California Placing Environmental Justice and Civil Rights at the Heart of Land Use Decision-making."
CEJA-Report-Rethinking\_Local\_Control-05\_web.Pdf. Accessed June 21, 2023.
<a href="https://calgreenzones.org/wp-content/uploads/2020/03/CEJA-Report-Rethinking\_Local\_Control-05\_web.pdf">https://calgreenzones.org/wp-content/uploads/2020/03/CEJA-Report-Rethinking\_Local\_Control-05\_web.pdf</a>, 27-28

#### APPENDIX F

Oakland Climate Action Network (OCAN)

In addition to our above recommended amendments to EJ-A.32 (regarding hosting an annual city-wide conference), we offer the following details to emphasize how the OCAN provides the necessary infrastructure for the City to implement many of the proposed policies and actions within Goal EJ-8. The structure of the OCAN—which is summarized in Oakland's 2030 ECAP and detailed in the ECAP's Racial Equity Impact Assessment and Implementation Guide (REIA)—calls for and details strategies to:

- Increase the city's capacity to practice interdepartmental coordination and meaningfully partner with Oakland CBOs and residents (*related to Policies EJ-8.2, 8.6 and 8.7*):
  - "The OCAN city wide network must include not only community organizations and engaged residents but also key partners within City departments. In support of OCAN, each implementing City department should designate a knowledgeable staffer to be the community engagement partner and interdepartmental liaison. These City staff would collaborate and comprise the main line of communication between City departments implementing ECAP actions.
  - This type of organized role would streamline communication and help alleviate the bureaucratic complexities of working across departments. Furthermore, the regular presence of knowledgeable staffers at OCAN meetings builds trust and puts community organizations in a better position to cooperate and collaborate with the City through OCAN —a direct line of communication with all relevant key City partners. Lowering institutional barriers to community engagement and creating an efficient system of inter-departmental communication will directly translate to improved and empowered City-community partnership and co-ownership on ECAP implementation."<sup>65</sup>
- Establish local, issue-base implementation committees (related to Policies EJ-8.1, 8.3 and 8.5 and Action EJ-A.32)
  - "To ensure robust implementation of CL-5, the Oakland Climate Action Network (OCAN) should include establishment of decentralized, neighborhood-based governance bodies, envisioned as regularly occurring decision-making forums, held in neutral, community-oriented, and accessible public spaces where people already gather (such as libraries, schools, and recreation or community centers). OCAN committees would focus on implementing the ECAP Actions most relevant to the challenges faced by residents in those neighborhoods."66

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<sup>&</sup>lt;sup>65</sup> Tobias, Marybelle Nzegwu, Colin Miller, David Jaber, and Sooji Yang. "2030 Equitable Climate Action Plan Racial Equity Impact Assessment & Implementation Guide." FINAL\_Complete\_EF-Racial-Equity-Impact-Assessment\_7.3.2020\_v2.Pdf. July 3, 2020. <a href="https://cao-94612.s3.amazonaws.com/documents/FINAL\_Complete\_EF-Racial-Equity-Impact-Assessment\_7.3.2020\_v2.pdf">https://cao-94612.s3.amazonaws.com/documents/FINAL\_Complete\_EF-Racial-Equity-Impact-Assessment\_7.3.2020\_v2.pdf</a>, 22 
<sup>66</sup> Ibid, 23

"The Oakland Climate Action Network can integrate existing bodies and forums such as Neighborhood Crime Prevention Councils (NCPCs), neighborhood associations and resident action councils (e.g., Santa Fe Community Association and Neighbors, Sobrante Park Resident Action Council, EBALDC's Healthy Havenscourt Collaborative), community and recreation centers (e.g., Bushrod, Rainbow and Tassafaronga Rec Centers), [resilience hubs,] engaged congregations and faith groups (e.g., Allen Temple Baptist Church, Kehilla Synagogue), existing place-based community organizations (e.g., Unity Council in the Fruitvale, Black Cultural Zone in East Oakland) and membership-driven, base building organizations (e.g., Communities for a Better Environment in East Oakland, Asian Pacific Environmental Network in Chinatown)."67

<sup>&</sup>lt;sup>67</sup>Tobias, Marybelle Nzegwu, Colin Miller, David Jaber, and Sooji Yang. "2030 Equitable Climate Action Plan Racial Equity Impact Assessment & Implementation Guide." FINAL\_Complete\_EF-Racial-Equity-Impact-Assessment\_7.3.2020\_v2.Pdf. July 3, 2020. https://cao-94612.s3.amazonaws.com/documents/FINAL\_Complete\_EF-Racial-Equity-Impact-Assessment\_7.3.2020\_v2.pdf., 24