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December 23, 2019

Via First Class Mail and Email

Mr. Joseph Lambert
Director of Development Services
City of Placentia, Development Services
401 E Chapman Avenue
Placentia, CA 92870
jlambert@placentia.org

RE: Health, Wellness, & Environmental Justice Element of the Placentia General Plan

Dear Mr. Lambert:

The California Attorney General's Office Bureau of Environmental Justice writes to compliment the City of Placentia on its recently adopted General Plan. In particular, we find the Health, Wellness, & Environmental Justice element ("EJ Element") to be an innovative model for compliance with Senate Bill 1000 ("SB 1000") and we applaud Placentia's efforts to improve health and equity in the city.

Background on Environmental Justice and SB 1000

The California Legislature passed SB 1000 in 2016 to promote environmental justice through local land use and planning processes. SB 1000 requires local governments to take into account disproportionate pollution burdens and the unique health risks that accompany the exposure experienced by low-income communities. The law intends to make environmental justice a real and vital part of the planning process by requiring local governments to identify environmental justice issues in their communities and address those issues through tailored policies.

Placentia's Environmental Justice Element

In our view, Placentia's EJ Element includes many policies aimed at holistically addressing environmental justice, and we hope other local governments will use it as a model as they review and update their general plans. Placentia's EJ Element identifies two communities in the City with elevated pollution burdens: The La Jolla neighborhood and a portion of the Old Town area. In over 150 policies in 17 different goal areas, the EJ Element policies place disadvantaged communities at the forefront of Placentia's long-term blueprint. The policies address the

interconnected role of environmental, social, and economic sustainability in improving the lives of Placentia residents. We highlight several of the most noteworthy policies below.

➤ Community Engagement

Placentia collaborated with a local nonprofit organization, LOT318, to engage with local residents in their neighborhoods through community meetings and surveys. Because of this effective outreach to the community, the EJ Element enumerates residents' concerns and addresses those concerns through the goals and policies. For example, the EJ Element includes policies that address the concerns raised by the community relating to improved pedestrian lighting and code enforcement, increased access to green spaces to encourage physical activity, and expanded hours and locations for food distribution programs.

➤ Accessible Publications and Meetings

The EJ Element accommodates non-English speakers in its engagement policies, recognizing linguistic differences within the community. Census data estimates that 38 percent of people living in Placentia speak a language other than English at home.¹ The Element's policies address language barriers and access to information by requiring outreach materials be published in Spanish and other appropriate languages. Policies also require a translator or translation headsets at public meetings so that residents can engage firsthand with meeting content. These initiatives will help foster meaningful civic engagement by making the decision-making process accessible to the entire community.

➤ Policies Aimed at Reducing Air Pollution Exposure

The EJ Element prohibits new sources of air pollution within the City's disadvantaged communities. Like many urban areas of California, Placentia's disadvantaged communities face health risks from air pollution generated by mobile and industrial sources. The EJ Element thoughtfully details the risks the communities face from diesel particulate matter and toxic air contaminants, explaining the origins of these pollutants and the potential health consequences of exposure in straightforward language. To help ameliorate air quality concerns, the EJ Element promotes land use patterns that reduce driving and redirect truck routes away from residential areas and sensitive land uses, as well as encouraging existing sources of air pollutants to use feasible mechanisms to minimize their emissions.

➤ Climate Change Mitigation and Adaptation

The EJ Element explains the impact that climate change will have in the disadvantaged communities, linking the communities' low tree canopy coverage with the risk of heat-island effect. One policy commits to planting street trees along all streets in the disadvantaged communities by 2023. This is just one example of a clear policy—with a concrete deadline—that will yield benefits by cleaning the air, sequestering carbon, cooling neighborhoods, reducing stormwater costs, buffering noise, and providing wildlife habitat. Likewise, the Element's

¹ U.S. Census Bureau, *QuickFacts: Placentia City, California* (July 1, 2018) <<https://www.census.gov/quickfacts/placentiacitycalifornia>> (as of Nov. 22, 2019).

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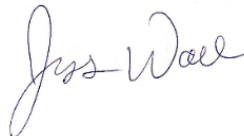
comprehensive policies include one supporting resilience training for staff, community leaders, and residents to deal with the social and psychological impacts of climate change. Innovative policies like this will equip Placentia residents with the tools they need to live longer, healthier lives in a changing climate.

➤ Prioritization of Disadvantaged Communities

One of the most beneficial aspects of the EJ Element is its conflict provision. The EJ Element provides that “wherever the following goals, policies or objectives appear to conflict with others within the General Plan, the goals, policies and objectives of [the EJ Element], if viewed as stricter, shall prevail.” This prioritization of the health and needs of disadvantaged communities is a positive step towards remedying inequitable allocation of pollution burdens and environmental benefits.

In conclusion, we congratulate Placentia on the adoption of its EJ Element, which will serve as a valuable example for other municipalities working towards SB 1000 compliance. We hope that Placentia will continue its efforts at furthering environmental justice through scrupulous implementation of the EJ Element, including regular evaluation and reporting on the status of policy implementation. Please do not hesitate to contact me if you have any questions or would like to discuss these issues further.

Sincerely,

A handwritten signature in cursive script that reads "Jessica Wall".

JESSICA WALL
Deputy Attorney General

For XAVIER BECERRA
Attorney General