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California Environmental Quality Act Guidelines Supplemental

GUIDANCE FOR IMPLEMENTING BEST PRACTICES
FOR CENTERING ENVIRONMENTAL JUSTICE,
HEALTH, AND EQUITY IN CEQA

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Introduction

Since publishing the 2022 [California Environmental Quality Act \(CEQA\) Air Quality Guidelines](#) the Bay Area Air District (Air District) received requests for additional support to implement Chapter 2, “[Best Practices for Centering Environmental Justice, Health, and Equity](#).” (Chapter 2). One of the challenges expressed by partners and lead agencies in using Chapter 2 is the lack of implementation examples. To address this challenge, the Air District compiled this reference document with example environmental justice CEQA analyses as well as similar environmental assessments from states other than California. This guidance provides nonbinding recommendations intended to assist lead agencies with navigating the CEQA process.

To date, most of the CEQA project examples include a chapter on environmental justice and equity, rather than integration of these considerations throughout the CEQA document. Integrating environmental justice, health and equity into all the CEQA impact analyses and mitigations will help ensure the strongest possible outcomes.

In addition, it is worth noting here a best practice resource for environmental justice, equity and racial impact assessments, Race Forward’s “[Racial Equity Impact Assessment Toolkit](#).”¹ This two-page resource is an accessible and straightforward overview of what Racial Impact Assessments are, why they are needed, when they should be conducted, and where they are being used. Sample questions to include in a racial impact analysis are also provided. This framework is similar to Chapter 2, as noted in Table 1 below. It should be noted that not all of Race Forward’s steps are required by CEQA (for example, “examining the causes”).

Table 1: Mapping Race Forward's Racial Equity Impact Assessment Toolkit to Chapter 2 of the Air District's 2022 CEQA Guidelines

2022 CEQA Guidance Chapter 2	Race Forward
Inform , consult, or engage overburdened and/or AB 617 communities in CEQA analysis and decision making.	Identify stakeholders Engage stakeholders
Identify projects located in overburdened and/or AB617 communities.	Identify and document racial inequities Examining the Causes
Analyze project-level impacts on overburdened and/or AB 617 communities.	Clarify the purpose Consider adverse impacts
Determine whether the project is centering nondiscrimination and environmental justice throughout its mitigation plan, cumulative impacts analysis, and alternatives analysis.	Advance equitable impacts Examine alternatives or improvements Ensure viability and sustainability

¹ Keleher, Terry. Applied Research Center. Race Forward: The Center for Racial Justice Innovation. (2009). Racial Equity Impact Assessment. Race Forward. Retrieved from: https://www.raceforward.org/sites/default/files/RacialJusticeImpactAssessment_v5.pdf

2022 CEQA Guidance Chapter 2	Race Forward
	Identify success indicators

Note: See the *Spectrum of Community Engagement from Movement Strategy Center*² for helpful information on engaging stakeholders.

Example environmental justice analyses in CEQA documents are provided in Table 2. Each is briefly described and the extent the analysis addresses the four criteria included in Chapter 2 is noted:

- Inform, consult, or engage overburdened and/or AB 617 communities in CEQA analysis and decision making (**Inform**);
- Identify projects located in overburdened and/or AB617 communities (**Identify**);
- Analyze project-level impacts on overburdened and/or AB 617 communities (**Analyze**); and
- Determine whether the project is centering nondiscrimination and environmental justice throughout its mitigation plan, cumulative impacts analysis, and alternatives analysis (**Determine**).

The example CEQA analyses included in this reference document were selected as they help demonstrate a process or approach to including the four criteria listed above and in Chapter 2. The Air District is not specifically endorsing any of these processes or approaches or the contents of these analyses. More broadly, the merits of the example projects were not evaluated, nor were the potential significant impacts or mitigations to reduce these impacts. Inclusion of these projects in this reference document should not be considered support for, or concurrence with, the environmental analyses.

Since including environmental justice, health and equity in CEQA is still a nascent field, additional resources including example environmental justice and equity checklists, worksheets, and related projects and plans are also provided (please See Table 3). These examples help demonstrate equity and environmental justice assessment approaches that can also be applied in CEQA.

Future iterations of this reference document may include examples and resources for aligning with the [Air District's 2024-2029 Strategic Plan](#)³, as well as "[A Call to Action: Charting a New Course Toward Environmental Justice in the Bay Area Air Quality Management District](#),"⁴ drafted by the Air District's Community Advisory Committee (CAC). This Environmental Justice Action Plan is a community-centered document that lays out the desired outcomes of nine environmental justice priorities and identifies the Air District's plan to respond to each priority with concrete strategies and actions.

² Gonzalez, Rosa. Facilitating Power. (2019). The Spectrum of Community Engagement to Ownership. Movement Strategy Center. Retrieved from: <https://movementstrategy.org/wp-content/uploads/2021/08/The-Spectrum-of-Community-Engagement-to-Ownership.pdf>

³ Bay Area Air Quality Management District. (2024). 2024-2029 Strategic Plan. Bay Area Air District. Retrieved from: https://www.baaqmd.gov/~/_media/files/strategic-plan/final-strategic-plan-pdf.pdf?rev=187dd38a95a24bd499c5ba5764d47fd7&sc_lang=en

⁴ Bay Area Air District Community Advisory Committee. (2024). A Call to Action – Charting a New Course Toward Environmental Justice at the Bay Area Air Quality Management District. Bay Area Air District. Retrieved from: https://www.baaqmd.gov/~/_media/files/board-of-directors/community-advisory-council/foundational-documents/airdistrict-calltoaction-r9-pdf.pdf?rev=82616b16385c41b4ba923989d13a9c79&sc_lang=en

Table 2: Examples of Environmental Justice Analyses in CEQA and Other Related Environmental Assessments

Project Title	Description	Chapter 2 Criteria				Resource Links
		Inform	Identify	Analyze	Determine	
Los Angeles County Flood Control District's Enhanced Watershed Management Programs Draft Program Environmental Impact Report (EIR): Chapter 3.11 Population and Housing and Environmental Justice	<u>Description:</u> Chapter 3.11 is the Population and Housing and Environmental Justice chapter and analysis of the Los Angeles County Flood Control District's Enhanced Watershed Management Programs Draft Program Environmental Impact Report (EIR) . This example includes an impacts assessment that defines a significant environmental justice impact, specifically outcomes that would “affect the health or environment of minority or low-income populations disproportionately.” This example also includes a discussion of the potential environmental justice impact of the project, Impact 3.11-4 “Implementation of the proposed program could affect the health or environment of minority or low-income populations disproportionately.”		X	X		Chapter 3.11 Population and Housing and Environmental Justice LA County Public Works, Enhanced Watershed Management Programs Program EIR , January 2015
Los Angeles County Public Works Chiquita Canyon Landfill Master Plan Revision Draft Environmental Impact Report (DEIR): Chapter 16 Environmental	<u>Description:</u> Chapter 16.0 is the Environmental Justice and Socioeconomics chapter and analysis of the Los Angeles County Public Works Chiquita Canyon Landfill Master Plan Revision Draft Environmental Impact Report (DEIR) . This example includes an analysis of the proposed project's environmental justice impact. In this example, the criteria used to determine if the proposed project would result in an environmental justice impact is “(1) the minority population of the		X	X		Chapter 16.0 Environmental Justice and Socioeconomics LA County Public Works, Chiquita Canyon Landfill Draft Environmental Impact Report (DEIR)

Project Title	Description	Chapter 2 Criteria				Resource Links
		Inform	Identify	Analyze	Determine	
Justice and Socioeconomics	affected area exceeds 50 percent; and (2) the minority population portion in the affected area is meaningfully greater than that in the general population or other appropriate geographical unit of comparison.” These criteria are from the environmental justice guidelines for the National Environmental Policy Act (NEPA) identified in the federal document: Environmental Justice; Guidance Under the National Environmental Policy Act (Council on Environmental Quality, 1997). This example also includes an analysis of minority and low-income populations in Los Angeles County.					
The Port of Los Angeles’s Southern California International Gateway (SCIG) Project Final Environmental Impact Report (FEIR): Chapter 6 Environmental Justice and Chapter 7 Socioeconomics	Description: Chapter 6 is the Environmental Justice chapter and analysis, and Chapter 7 is the Socioeconomics and Environmental Quality chapter and analysis, of the Port of Los Angeles’s Southern California International Gateway (SCIG) Project Final Environmental Impact Report (FEIR) . This example analyzes project-level impacts on an environmental justice community and includes community outreach. In addition, this project includes a chapter on Socioeconomics and Environmental Quality, describing employment and earnings, population, and housing resources. This example includes a map showing the percentage of the minority and low-income populations within a 1-mile buffer of the project	X	X	X		Chapter 6 Environmental Justice Chapter 7 Socioeconomics and Environmental Quality Port of Los Angeles, Southern California International Gateway Project Final Environmental Impact Report (FEIR) , March 7, 2013 (Website link: Scroll down to section “Projects Certified by the Los Angeles Board of Harbor Commissioners and

Project Title	Description	Chapter 2 Criteria				Resource Links
		Inform	Identify	Analyze	Determine	
and Environmental Quality	boundary, as well as a table with the total population and proportion of minority and low-income populations per census block group.					click '+' to expand project title for additional resources).
New York City's Department of Parks and Recreation East Side Coastal Resiliency (ESCR) Final Environmental Impact Statement (FEIS): Chapter 5.11 Environmental Justice and Chapter 5.2 Socioeconomic Conditions	Description: Chapter 5.11 is the Environmental Justice chapter and analysis, and Chapter 5.2 is the Socioeconomic Conditions chapter and analysis, for the New York City (NYC) Department of Parks and Recreation's East Side Coastal Resiliency (ESCR) Final Environmental Impact Statement (FEIS). This example analyzes project-level impacts on an environmental justice community and includes community outreach. This example includes a map and table showing the percentage of the population within each census tract and block group in the project area by race, ethnicity, and poverty, and includes identification of minority and low-income communities. It should be noted that this analysis follows the guidance and methodologies recommended in the federal Council on Environmental Quality (CEQ)'s <i>Environmental Justice Guidance under the National Environmental Policy Act (NEPA)</i>. See reference to the "NYC Parks, East Side Coastal Resiliency Environmental Impact Statement" document above for details on the	X	X	X		Chapter 5.11 Environmental Justice Chapter 5.2 Socioeconomic Conditions New York City (NYC) Parks, East Side Coastal Resiliency (ESCR) Environmental Impact Statement (FEIS)

Project Title	Description	Chapter 2 Criteria				Resource Links
		Inform	Identify	Analyze	Determine	
	project's community outreach. Specifically: Starting on PDF page 1 of the "Chapter 2.0 Project Alternatives" document, and the "Chapter 3.0 Process, Agency Coordination, and Public Participation" document. Refer to "Chapter 5.2 Socioeconomic Conditions" link for details on the project's identification of their project in an overburdened community.					
San Francisco Gateway Project Draft Environmental Impact Report (DEIR): Section 3.A.4 "Approach to Analysis" and "Approach to Socioeconomic Effects," and Section 3.A.5 "Historic and Existing Context of San Francisco Bayview Hunters Point Neighborhood"	<u>Description:</u> Section 3.A.4 "Approach to Analysis" and "Approach to Socioeconomic Effects," as well as Section 3.A.5 "Historic and Existing Context of San Francisco Bayview Hunters Point Neighborhood" include the environmental justice related analysis and sections of the San Francisco Gateway Project Draft Environmental Impact Report (DEIR). This example includes a "Cause" section (see Race Forward's "Racial Equity Impact Assessment Toolkit") that describes the historical context of an overburdened neighborhood, including the history of redlining, indigenous populations, and past industry (e.g. shipbuilding) that sets the context for the project area's present-day community. This example includes a map of CalEnviroScreen 4.0 results for the project area, as well as the surrounding city for comparison, specific health information, such as asthma emergency room visits and COPD	X	X			San Francisco Gateway Project Draft Environmental Impact Report (DEIR) (see Section 3.A.4 "Approach to Analysis" and "Approach to Socioeconomic Effects," and Section 3.A.5 "Historic and Existing Context of San Francisco Bayview Hunters Point Neighborhood" (pg. 3.A.6))

Project Title	Description	Chapter 2 Criteria				Resource Links
		Inform	Identify	Analyze	Determine	
	rates, acknowledgement of the project area as an AB 617 community, and identifies geographic boundaries of areas that would be affected by an increase in emissions from Vehicle Miles Traveled (VMT). See starting on PDF page 72 of the “San Francisco Gateway Project Draft EIR” for details on the project’s outreach to community. See Section 3.A.5 “Historic and Existing Context of San Francisco’s Bayview Hunters Point Neighborhood” of the “San Francisco Gateway Project Draft Environmental Impact Report (DEIR)” for a description of the “Cause” as included in Race Forward’s Equity Impact Assessment Checklist.					

Table 3: Best Practice Environmental Justice and Equity Checklists, Worksheets, and Related Projects and Plans.

Checklist/Worksheet Title	Description	Resource Links
City of Oakland Racial Equity Impact Analysis Worksheet	The City of Oakland’s Racial Impact Analysis Worksheet is meant to be used at multiple organization and policy levels, including by City staff, elected officials	City of Oakland Racial Equity Impact Analysis Worksheet (April 2021)

Checklist/Worksheet Title	Description	Resource Links
	and City leadership, community, advisory bodies, and consultants. This worksheet includes all relevant sections covered in most racial impact analyses. There are also prompts under each section that can help those who are not familiar with using these types of tools.	Program website – ECAP Program website – Racial Equity at Planning and Building <u>Projects Using or Influenced By This Worksheet:</u> • City of Oakland Racial impact Assessment and Implementation Guide (January 2021) • Oakland 2045 Environmental Justice and Racial Equity Baseline (March 2022) • Downtown Oakland Specific Plan *See starting on Page 17 for the Equity Framework
City of Seattle Race and Social Justice Initiative (RSJI) Racial Equity Toolkit	The City of Seattle's Racial Equity Toolkit lays out a process and set of questions to guide the development, implementation, and evaluation of policies, initiatives, programs, and budget issues to address the impacts on racial equity. This toolkit includes examples of community outcomes that increase racial equity, as well as additional data resources, and specific links to national data. There is also a glossary included that defines common terms in racial equity tools. In addition, there are seven examples of projects using and implementing the Racial Equity Toolkit	City of Seattle Race and Social Justice Initiative (RSJI) Racial Equity Toolkit <i>(January 2024 revision)</i> Program website Projects that have utilized the City of Seattle's Racial Equity Toolkit in their development: • Cannabis Equity - A Racial Equity Toolkit Project

Checklist/Worksheet Title	Description	Resource Links
	(RET), which include not only aspects of the worksheet/checklist, but specifically how the project will address the impacts (including unintended consequences).	• Department of Neighborhoods Participatory Budget program RET • Barriers to breastfeeding in Public RET • Parks Department Budget Reductions RET • School Attendance Campaign RET • Source of Income Discrimination RET • Hookah Lounges RET
New Jersey's Department of Environmental Protection Environmental Justice Impact Statement (EJIS) Guidance	New Jersey's Department of Environmental Protection's environmental justice impact statement (EJIS) guidance is a set of specific requirements and procedures that applicants must follow when seeking permits for certain pollution generating facilities located, or proposed to be located, in overburdened communities. This example focuses on considering environmental justice in permitting. Specifically, it establishes specific requirements and procedures that applicants must follow when seeking permits for certain pollution generating facilities that are located, or proposed to be located, in overburdened communities. It also includes specifics for identifying	New Jersey's Department of Environmental Protection environmental justice impact statement (EJIS) guidance New Jersey Department of Environmental Protection

Checklist/Worksheet Title	Description	Resource Links
	and analyzing impacts as well as supplemental information required when an applicant cannot demonstrate that the subject facility will avoid a disproportionate impact.	
San Francisco Planning Racial and Social Equity Assessment Tool Worksheet	This resource is the San Francisco Planning Racial and Social Equity Assessment Tool Worksheet issued by the San Francisco Planning Department for internal and external work including: budget, policies, plans, programs, phases of development project review, and legislation. This assessment tool includes prompts under each of the components, including information on the public participation spectrum, and links to additional resources from Race Forward and the Racial Equity Alliance.	San Francisco Planning Racial and Social Equity Assessment Tool Worksheet Program website
City of Portland Racial Equity Toolkit	The City of Portland's Racial Equity Toolkit is a set of guiding questions and activities that are organized into seven distinct tools. The Toolkit supports planning and decision-making across projects, programs, and policy work. The Toolkit was designed by the City of Portland Bureau of Planning and Sustainability. The tool includes a GANTT chart, which shows in which phase of project development and implementation each	City of Portland Racial Equity Toolkit (2022)

Checklist/Worksheet Title	Description	Resource Links
	component of the toolkit may be useful, including scoping, design, implementation, and evaluation. This toolkit also includes templates, and references.	
Saint Paul, Minnesota Racial Equity Impact Policy and Racial Equity Impact Reports	The Racial Equity Assessment Toolkit of the City of Saint Paul is used by city departments, elected policymakers, and community members to consider racial equity outcomes when shaping policies, practices, programs, and budgets, to guide the city in shifting their approach to their work, and weave racial equity into everyday decision-making. This tool is an example of a racial equity assessment toolkit being used for code enforcement.	Racial Equity Assessment Toolkit – City of Saint Paul
New York City Equitable Development Data Tool	The New York City Equitable Development Data Explorer is an online tool with information on equitable development at the city, borough, neighborhood and community level. Included as an example is the Gowanus Neighborhood Plan: Racial Equity Report on Housing and Opportunity (PDF). The Racial Equity Report Form and Racial Equity Report Submission Guide are also included here as they provide instructions for using the Data Explorer to produce Racial Equity Reports similar to the Gowanus Neighborhood Plan.	New York City Equitable Development Data Explorer Gowanus Neighborhood Plan: Racial Equity Report on Housing and Opportunity (PDF) <i>Note: See page 43 for a Housing example.</i> <i>Note: See page 52 for an Economic Development example.</i> Racial Equity Report Form

Checklist/Worksheet Title	Description	Resource Links
	This resource provides examples of racial equity analyses of proposed housing and economic developments. There are data and maps available for use, project components included in the analysis, and community profile indicators.	Racial Equity Report Submission Guide

Note: The City of Oakland's Racial Equity Impact Analysis Worksheet used in the development of several plans and projects, as well as the City of Seattle's Race and Social Justice Initiative Racial Equity Toolkit which was also utilized for several projects.