



TISHMAN CENTER · FEBRUARY 9, 2023

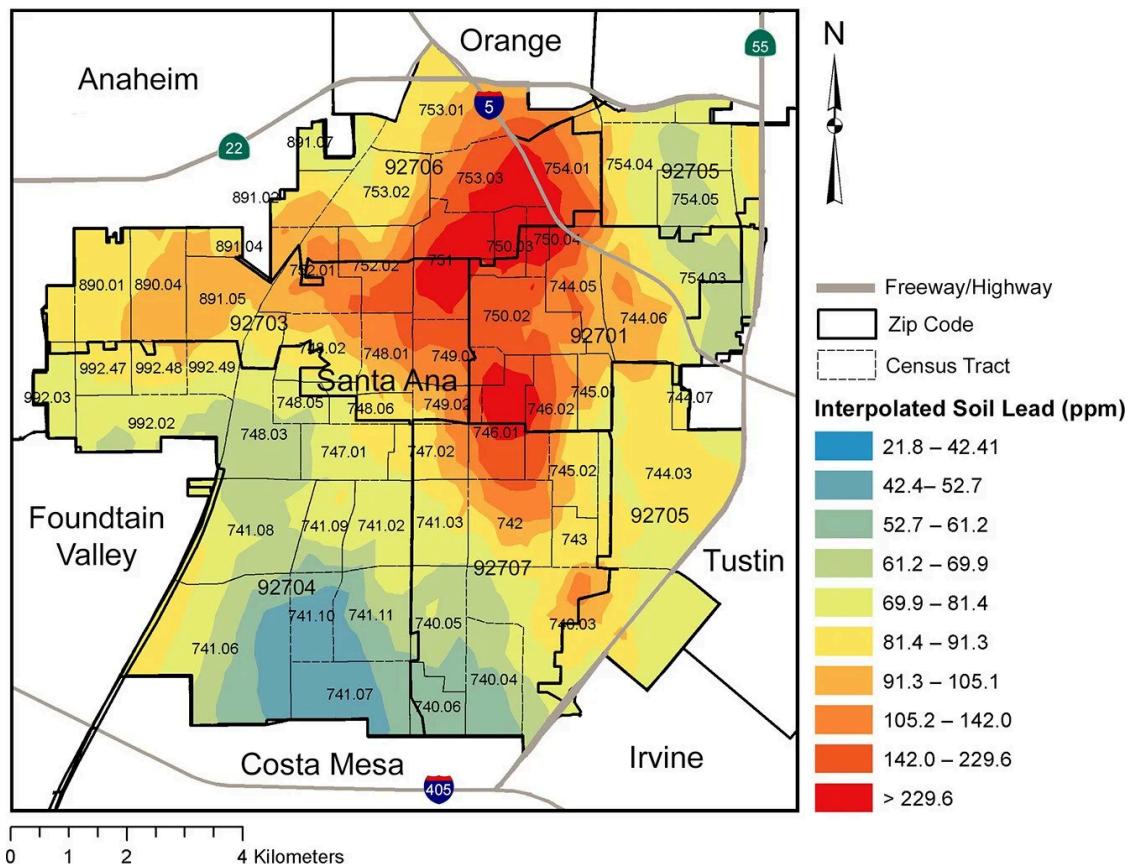
Tishman Center RA Enrique Valencia Published in Critical Planning Journal

By Enrique Valencia

In January 2023, *Critical Planning* published my article "[Evaluating Meaningful Engagement Under Environmental Justice Mandates: A Case Study of California's SB1000 Implementation in Santa Ana](#)". The

article is connected to environmental justice (EJ) advocacy that fellow EJ organizers and I led in Santa Ana, CA. Before starting my master's program at The New School and engaging with academic research, I was the director of Orange County Environmental Justice (OCEJ), an organization working to advance EJ in Orange County, California.

One of our projects focused on documenting the soil lead concerns of EJ communities in the City of Santa Ana. In 2018, OCEJ engaged in a partnership with faculty and students from the University of California, Irvine, and a youth cooperative known as *Jovenes Cultivando Cambios* known as *;Plo-NO!* (a play on *plomo*, the Spanish word for lead) to document soil lead (Pb) exposures. Before the work of our partnership, residents, aided by Yvette Cabrera at ThinkProgress, tested soil across Santa Ana using a portable reader and found hot spots in low-income communities of color. However, public officials failed to act on their concerns.



Building on this initial documentation of soil lead, *Plot NO!* led a soil sample collection team of youth and adults that canvassed 500 locations and collected 1500 soil samples from multiple land uses, including people's homes. The samples were tested and corroborated the community's initial findings, with over half of the samples testing above the children's lead exposure threshold of 80ppm. The soil lead crisis was just one of many EJ issues in Santa Ana that various community organizations were surfacing including the lack of accessible parks, the siting of noxious industry in residential neighborhoods, and unsafe and

infrastructure. Getting the City to address these issues was a challenge since it had a history of prioritizing developer interests over those of EJ communities.



However, EJ activists across the state saw the potential for increasing environmental justice in the physical development of cities with the passage of Senate Bill 1000 (SB1000) in 2016. SB1000 requires comprehensive plans/general plans to include stand-alone environmental justice elements or to integrate environmental justice policies throughout; SB1000 also requires Disadvantaged Communities (DACs), those communities located in the top 25% of statewide Census tracts exposed to environmental and social challenges, to have a meaningful role in shaping plans. In

Santa Ana, EJ activists believed that SB1000 could be a vehicle for addressing some of the EJ issues in the city.

The City began an update to its general plan in 2014 and planned to adopt it by the end of 2020.

However, by 2020, it was clear that the City's proposed plan did not address SB1000. Organizations, including OCEJ, formed *El Plan del Pueblo* (The People's Plan) coalition to push the City to delay the adoption of the general plan until it met the requirements of SB1000. In the fall of 2020, *Plan del Pueblo* mobilized community opposition to successfully postpone the adoption of the general plan and ensure the City met the requirements of SB1000.

santa-ana.org/documents/city-general-plan-approved-environmental-justice-implementation-actions-2022/

City of Santa Ana Services Residents Businesses Departments

[Documents and forms](#)

 **City General Plan Approved Environmental Justice Implementation Actions 2022**

Planning Division December 29, 2022 PDF · 525 KB [Download](#)

This document reflects the approved General Plan policy and implementation action related to Environmental Justice, following adoption by the City Council on April 19, 2022.

Community	Area	Yes	desert data, and share publicly through the City's Environmental Quality webpage. Collaborate with health care providers, health and wellness advocates, and other public health stakeholders to identify ways to improve the provision of and access to health and wellness services throughout the city. Include a discussion on areas within environmental justice area boundaries and other areas underserved by parks, programs and services that support health and wellness.	PRCSA	2022 ongoing
Community	3.7	Yes	Environmental soil and human health screening measure. Collaborate with Orange County Health Care Agency, and local stakeholders such as Orange County Environmental Justice and UC Irvine Public Health, in efforts to provide increased healthcare services (i.e., blood lead testing, treatment) for residents, especially those that reside in environmental justice communities. Additionally, collaborate to advocate for adjustment of the County and State policies for health and environmental screening levels to promote healthy outcomes related to lead contamination as recommended by health experts.	PBA	Ongoing
Community	3.8	Yes	Environmental Justice Staff. Identify funding and hire a full-time Environmental Justice staff member to collaborate with the community to implement the environmental justice policies and actions, including community outreach, collaboration on environmental health studies, pursuing grants, and coordination with federal, state, and local agencies regarding environmental concerns in the City.	OMO	2022

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City of Santa Ana
General Plan EJ Actions

Given the novelty of SB1000 and my experience observing the struggles of its implementation in Santa Ana, I was interested in exploring the implications of a top-down EJ planning mandate on local implementation. I wanted to synthesize the experience of Santa Ana with SB1000 in a case study to identify opportunities for maximizing its environmental justice potential in Santa Ana and across the state. My article explores the City of Santa Ana's general plan update from 2014-2020 to understand whether SB1000 contributed to the meaningful engagement of the city's EJ communities. Santa Ana's general plan update was defined by the statewide implementation of SB1000 in 2018 and the 2020 global COVID-19 pandemic.

I find that the initial general plan framework was captured by NIMBYs (Not-In-My-Backyard), and the City was unable to pivot to meet the spirit of SB1000. Moreover, the City resisted activist and state demands to halt general plan adoption amid COVID-19. The results support findings by scholars who have documented white supremacy in planning and the harmful effects on low-income and Black, Indigenous, People of Color. I point to the challenges of implementing statewide environmental justice mandates at

the municipal level and provide recommendations for practice.



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