



To: Lori Reese-Brown, Principal Planner, City of Richmond

From: The Richmond Equitable Development Initiative (REDI)

Date: September 30, 2009

Subject: Draft General Plan Public Comment

Collaborative Partners:

ACORN – Richmond Chapter

Contra Costa Interfaith Supporting
Community Organization (CCISCO)

Contra Costa Faith Works!

East Bay Alliance for a
Sustainable Economy

Greater Richmond
Interfaith Program (GRIP)

Urban Habitat

Project Partners:

Asian Pacific Environmental Network

Laotian Organizing Project (LOP)

Communities for a Better Environment (CBE)

The Richmond Equitable Development Initiative (REDI) views the General Plan as an opportunity to incorporate policies that can lead to: a healthier community through affordable housing, reliable and safe public transportation that connects to quality family-supporting jobs, a cleaner environment, accessible community amenities from open space, health care, access to healthy food, and greater community ownership.

REDI brings together a diverse collaborative of organizations and community members who want to create and realize a common vision for an equitable Richmond. In late 2007, following a highly attended REDI community education forum, REDI released its policy recommendations and implementation measures for the land use, circulation, economic development, housing, and health elements in Richmond's General Plan Update.

We are pleased that some policies and actions reflecting our recommendations appear in the draft General Plan, however, we have also identified a number of areas that we feel need strengthening so that the plan can achieve its full potential. Below are recommended improvements on priority policy recommendations and actions identified by Richmond residents who are active members of REDI affiliated organizations:

- **Goals for Reducing Health Disparities:** We recommend an addition in the **Health Element** that identifies the city's health disparities and sets specific goals and targets for how the City plans to reduce these disparities in Richmond over the next 10 years.
- **Neighborhood Revitalization Plans:** For **Action HW7 in the Health Element**, add language that makes neighborhood revitalization plans a binding component of the General Plan. As written now, it is unclear what legal weight these revitalization plans will carry and how they will be implemented.
- **Public Safety Design Guidelines:** For **Action HW1.H in the Health Element**, strengthen this action so that there is a requirement for a community *Crime Prevention through Environmental Design (CPTED)* assessment to be conducted in concert with the development of the design guidelines and supports the inclusion of community policing.

- **Community Ownership:** Add language in the **Land Use Element** that supports community ownership mechanisms, such as community land trust models for both housing and commercial uses.
- **Green Business Strategic Plan:** For **Action ED3.A in the Economic Development Element**, add language that is inclusive of other community stakeholders that have an interest in creating a green business strategic plan, such as local residents, workforce development agencies and programs, labor unions, etc. As currently written, the only entities included in this process are the Chamber of Commerce and the Council of Industries.
- **Contaminated Site Remediation Plan:** For **Action ED1.G in the Economic Development Element**, it is important that language is included that encourages the creation of a site inventory and the involvement of community stakeholders in the site remediation plan process. Currently, the plan focuses on developing strategies to remediate and cleanup contaminated sites, but lacks information about how the City will approach the remediation of existing and current sites.

Additionally, REDI collaborative partners identified the following as key policy recommendations and actions that should be enhanced and/or included in the adopted General Plan:

Economic Development Element

Economic Development Key Findings and Recommendations- Finding 2: Include a bullet point specifying the creation and development of training programs for identified key growth job sectors.

Action ED1.F Capital Improvement Program: Include language exploring the enactment of an ordinance to establish a First Source Fund. This Fund would generate dollars based on an allocation of 2% of the project budget for each city-based eligible capital project and would be used to support and administer the First Source Employment Program.

Action ED1.M Development Permitting Process Improvements: In addition to current language, the city should explore expanding the conditional use permit system for large-scale development projects above 80,000 square feet, over 250 residential units, or over \$500,000 in estimated construction costs, in order to ensure ongoing accountability to the city. The city should also explore comprehensive community impact reports that analyze housing, jobs and health together for major zoning and development decisions.

Policy ED2.1 Local Employment Base, Action ED3.A Workforce Development Strategy: Include language that specifies training and employment interventions for populations with high barriers to employment (youth, the formerly incarcerated, and residents with limited English proficiency). Recommend that the City explore a workforce training impact fee to help fund the targeted job training measures and conduct a nexus study for Workforce Training Fee. The city should also include steps to support expansion of living wage standards, local hire policies, and employment interventions for hard to employ populations as well as language expanding the influence

of the Living Wage Ordinance to traditionally low-wage industries, such as janitorial, housekeeping, security guards, and cashiers.

Action ED2.H - Local First Source Hire Ordinance: Add language to this action measure about the need to increase monitoring and enforcement of this ordinance which will align with language in the current ordinance. The ordinance can also be strengthened with language about increasing penalties for non-compliance. This action measure should also identify the entity that will monitor the ordinance and that is inclusive of the WIB, community, labor, employers and redevelopment agency staff.

Policy ED2.6 Environmentally Responsible Businesses and Industries, Action ED8.A Southern Shoreline Specific Plan and ED8.D Industrial Property Visual Appearance Ordinances: Include language requiring local hire standards and other community benefits for each of these policies.

Action ED3.A - Workforce Development Strategy: Add language that includes other growth industries in addition to “green” sectors that can provide jobs for the Richmond workforce to economically advance. In addition, specific language should be added that specifies what types of training in green sectors is needed. An action measure should be added that explores mechanisms for funding workforce development programs such as a workforce training fee or a designation from the City’s capital improvement budget.

Action ED7.A Richmond Parkway Specific Plan, ED8.A Southern Shoreline Specific Plan, and ED8.B Ferry Terminal Specific Plan: Add language that includes local residents and workers in these comprehensive planning efforts. Currently, residents are not specified as stakeholders in these planning efforts. It is integral that local residents have the opportunity to meaningfully engage in land use planning. Community engagement in neighborhood planning will improve the quality of planning and help produce the level of buy-in needed for implementation and follow through.

Land Use Element

Policy LU3.1 - Environmentally Responsible Businesses and Industries, Action LU3.A - Green Business Strategic Plan: Add language setting targets and timetables for the creation of green jobs in partnership with industry, community-based organizations, and the Richmond Workforce Development Agency. Language should also be incorporated that specifies how the City’s industrial land can be utilized to foster green business and economic development.

Policy LU3.E Southern Shoreline Specific Plan, LU3.G Hilltop Specific Plan: Add language that includes local residents in these comprehensive planning efforts. Currently, residents are not specified as stakeholders in these planning efforts. It is integral that local residents have the opportunity to meaningfully engage in land use planning. Community engagement in neighborhood planning which will improve the quality of planning and help produce the level of buy-in needed for implementation and follow through.

Action LU3.E - Southern Shoreline Specific Plan, Action LU4.A - Waterfront Redevelopment Plan, and Policy LU3.5 - An Economically Viable and Modern Port: Add language clarifying how approved plans will interact with one another, how they overlap, and which plans have precedence. We recommend reducing the number of plans so that each plan can be effectively implemented and prioritized to address: *green industry* which provides job and training opportunities for the local workforce, *southern shoreline development* that is inclusive of development that creates access to affordable housing, quality jobs and open space and *neighborhood planning* that promotes meaningful community engagement. Add language to the specific plan proposals that identifies the specific location and types of buffer zones to be implemented in each plan so that residential neighborhoods are protected from industrial pollutants and industrial areas from encroachment by residential uses. Add language that describes how the Port and industry can utilize mechanisms to reduce health and nuisance impacts from truck and rail traffic, as well as, the process for assessing adverse health impacts of increased industrial operations, for example, reducing emissions from Port ships through shore-side power supply and retrofitting or replacing older equipment.

Circulation Element

Action CR1.4 Local and Regional Linkages: Add language that the City will coordinate with regional transportation agencies including AC Transit, BART, West Contra Costa Transit Agency, Amtrak, and employee shuttle service to improve services, including improvements in frequency, routes, efficiency, and connections between jobs, housing, services, and other uses.

Policy CR1.5 Expanded and Affordable Public Transit and Policy CR1.2 Access for All: Expand these policies into: “Goal CR6: Encourage a Socially Equitable Investment of Transportation Resource Investments.” Transportation investments in amenities, infrastructure, and networks that benefit low-income residents and communities of color are important to support neighborhoods and residents that need it the most. Develop a Goal section that focuses on Richmond residents through a “People-based Approach to Circulation” methodology that emphasizes the need for social equity for low income transit riders as opposed to the majority of higher-income Richmond residents that are automobile dependent as mentioned throughout the Circulation element.

Action CR1.B Public Transit and Paratransit Service Improvements: Add language that the City will be advocates for service improvements similar to the advocacy for regional circulation improvements mentioned in Action CR1.A. Include language indicating that the City will work jointly with regional transit agencies to improve City infrastructure to be transit-friendly.

Action CR1.H Street Capacity and Infrastructure Improvements: Add language that the City will coordinate with AC transit to promote and invest in bus services that will help Richmond residents. Coordinate within framework of Design section as well to create streets that are transit friendly including bus transponders for lights, adequate

street furniture, appropriate lighting for nighttime riders, etc. Incorporate transit-friendly improvements into the “Place Based Circulation Streets” section of the Circulation Element.

Action CR4.B Truck Routes Study and Policy CR4.1 Goods Movement: Develop Truck Routes Study with an emphasis on household income and race to ensure the most efficient and direct routes do not negatively impact low income residents or communities of color disproportionately more than other groups in terms of noise, air quality, or safety. Neighborhood or residential groups should be included in meetings on determining routes in addition to the port, truck operators, local businesses, and regional/state transportation agencies mentioned.

Health Element

Action HW1.H Public Safety Design Guidelines: Include language that supports community policing, neighborhood watch, and walking/ biking police patrols that engage residents.

Action HW2.1 Quality Food Stores: Add language that targets underserved neighborhoods and that promotes access to a wide range of healthy food sources in underserved neighborhoods.

Action HW2.A Healthy Food Store Incentive Program: Add new businesses, in addition to existing businesses, to further the potential health and economic development benefits of the proposed program.

Action HW5.A: Inclusionary Housing Ordinance: Include language detailing in-lieu fees that reflect developers’ costs of constructing affordable units and that requires a percentage of low or very low-income inclusionary units, and that requires a narrow set of circumstances by which developers can pay in-lieu fees instead of constructing inclusionary units.

Action HW5.C: Existing Housing Restoration Program: Include language that targets low-income neighborhoods, low-income homeowners and homes that meet the definition of need for rehabilitation to remodel for health and safety codes.

Action HW5.E: Rehabilitation Assistance Program: Include language specifying mechanisms to protect low-income renters from rent increases when models are remodeled.

Action HW7.A Neighborhood Revitalization Plans: Clarify the legal weight Revitalization Plans will carry in relation to Area and Specific Plans.

Action HW9.H Truck Routes Study: Add local residents as stakeholder with which to collaborate on the creation of this study especially as truck routes negatively impact certain neighborhoods.

Policy HW11.1 Organizational Capacity for Change: Add language that promotes the use of health criteria in reviewing and approving new development and

redevelopment projects to maximize their health benefits and minimize or eliminate health impacts. Add language that specifies partnering with residents to ensure community relevant criteria are considered.

Action HW11.A Training and Capacity-Building: Add experts and non-profits to the entities developing training programs.

Action HW11.B Healthy Development Criteria: Add language specifying what constitutes “significant” land development projects and plans. These criteria should include any development that is likely to have significant health impacts. Additionally, add language specifying thresholds reflecting the cumulative impacts of new developments, toxic exposure and buildup, cleanup procedures, and industry concentration on human and public health conditions, and racial or economic disparities in impacts.

Lastly, REDI collaborative partners found the following policy recommendations excluded from the Draft General Plan and REDI believes they should be included in the adopted General Plan.

Land Use Element

- **Strategic Industrial Planning:** Create a long-term strategic plan for Richmond’s industrial land that provides a framework for future industrial land use and economic development decisions. The plan should consider the need for high quality jobs and a healthy local environment and should be conducted with a wide range of stakeholders, including labor, industry, environmental justice organizations, open space advocates, and neighborhood residents.
 - Assess Richmond’s industrial land, including, but not limited, to current uses, new net job growth, job density, job quality (including wages and benefits), vacancy rates, land values, emissions and environmental impact, access to transportation infrastructure (rail, highway, bus and transit centers), proximity to residential neighborhoods, regional concentration and contribution to regional economy.
 - Adopt clear criteria for conversion of industrial land to other uses including assessments of economic contribution of the sub-area (in terms of jobs), proximity to neighborhood services, and net fiscal impact on the City.
 - Add language specifying that when land is converted to other uses, require community benefit outcomes, including high cleanup standards, provision of affordable housing or funding for affordable housing, local hire for on-site jobs and construction, targeted workforce training investment, and hiring trainees for new or expanded projects.
 - Add language stating the city will investigate industrial land conversion fees that help fund development of replacement industrial space in other parts of the city. These conversion fees can also be used to upgrade the operations of businesses that must operate in a residential environment and can help relocate displaced businesses.
 - Add language that articulates environmental justice principles when transforming industrial land for public spaces to ensure that these residences,

commercial areas, public spaces and parks are designed and built to maximize affordability, social and cultural integration and open access for all.

- **Community Ownership:** Investigate the feasibility of a community land trust for both industrial and residential land uses in order to reduce the impact of land speculation on local businesses and to retain long-term housing affordability.

CC: Richmond Planning Commission
MIG