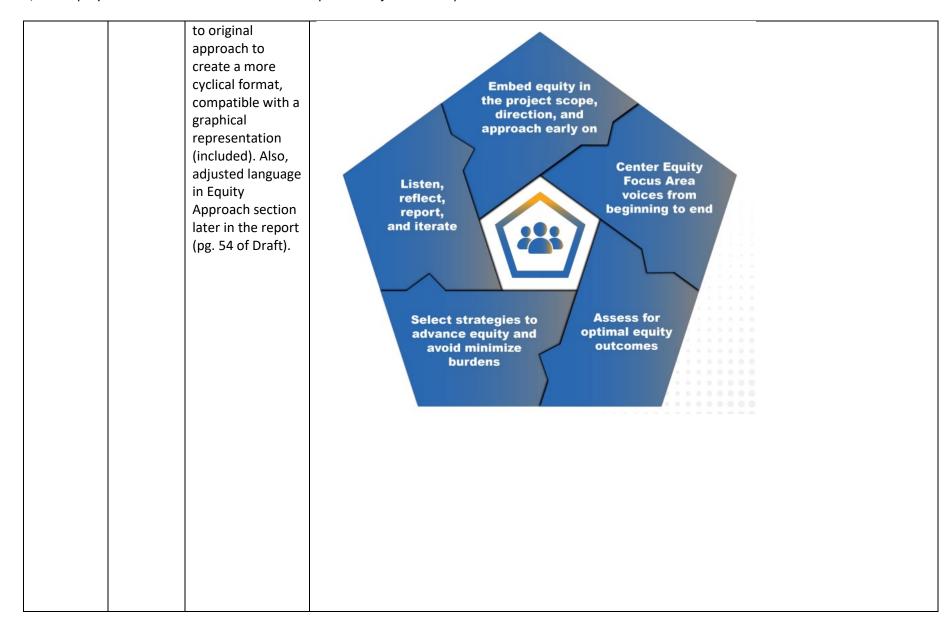
Page # in Draft Report:	Paragraph # in Draft Report:	Reason for Change	Updated Text
Throughout the document	NA	Visual appeal	Incorporation of photos in placeholders included in the draft report
Throughout the document	In footnotes	Greater clarity & understanding	Incorporation of definitions for planning and policy terms
Throughout the document	NA	Quality assurance/control	 Consistency in Formatting: Ensure consistent formatting throughout the document, including headings, subheadings, and bullet points. Punctuation: Consistent and correct use of punctuation. Spacing and Indentation: Create uniformity in spacing and indentation. Capitalization: Properly capitalize terms, particularly in titles and headings. Abbreviations and Acronyms: Define abbreviations and acronyms when first used. Tables and Figures: Correctly label and reference all tables, figures, and images.
Appendix II	NA	Greater clarity & understanding	Incorporation of definitions in Glossary of Equity Terms
Appendix IV	NA	Requested adjustments by agencies interviewed	Minor language adjustments. In some instances, summarize direct quotes.
Appendix V & VI	NA	Visual appeal	Design modifications to tables

Cover page	Bottom right text	More accurate agency description	Prepared for San Mateo County the City/County Association of Governments of San Mateo County (C/CAG)
1	Last line in Table of Contents	More accurate title and change from Draft to Final (Also adjusted title language on Draft pg. 126).	Appendix VII: DRAFT-Equity Evaluation Review-Planning Tool
Between page 2 and 3	Full page	More specificity in acknowledgement section	Added names and affiliations of C/CAG Board and Ad Hoc Committee members
3	1	Comma insertion	In San Mateo County, this has included investments in transportation infrastructure that reinforced segregation, and the practices of redlining and racial steering, and placing undesirable land uses in areas where people of color were concentrated.
3	5	Footnote insertion to point the reader to the full commitment statement and definition	*See C/CAG's full equity commitment statement and equity definition on pg. 56-57 of this report.
4	Bottom	Footnote insertion	DBEs are for-profit small businesseswhere socially and economically disadvantaged individuals own at least 51% interest and control management and daily business operations. African Americans, Hispanics, Native Americans, Asian Pacific and Subcontinent Asian Americans, and women are presumed to be socially and economically disadvantaged. Other individuals can also qualify on a case-by-case basis. (Definition of Disadvantaged Business Enterprise, n.d.).

5	2	Addition of visual tool to highlight equity approach for agency projects, programs, and planning efforts	Listen, reflect, and reproductively to the process of the process
5	1	Integration of language elsewhere in the Executive Summary and use of more concise language for greater clarity and directness	Through the development of this Equity Framework, C/CAG acknowledges that further improving on its strengths and addressing its agency's gaps and limitations will be no easy task, but has set goals, desired outcomes, and actions as part of a comprehensive Action Plan (Appendix VI) to make measurable progress. It has also laid out an Equity Approach and developed an Equity Evaluation Review Planning Tool (Appendix VII) to create consistency across program areas and assist staff in meeting the spirit of its equity definition and commitment to make progress. The agency will regularly evaluate and report back to its decision makers, advisory bodies, and community stakeholders, and adjust efforts as needed over time. C/CAG will need to update this internal agency assessment and framework as the agency progresses and new conditions and opportunities emerge. Informed by the equity analysis, C/CAG will be taking the following steps to implement the report findings, including: Applying an Equity Approach and using an Equity Evaluation Review tool to help create standardized processes and practices around achieving equitable processes and outcomes across projects, plans, and programs. Committing to an Action Plan (Appendix VI), which includes 7 Equity Goals, 13 Outcomes, and 36 Actions.
5	Moved	Inclusion of Equity Approach (Procedural Steps) and amendments	The following is the Equity Approach, or procedural steps, C/CAG staff will take in their work, as applicable to the agency's projects, programs, and planning efforts.



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Embed equity advancement into Embed equity in the the project scope and direction and approach:

- Establish intended equity goals, outcomes, and performance measures.
- Structure the planning and engagement process around achieving equitable outcomes, using the Equity Planning Tool (in Appendix VII) as a companion resource. Use the Equity Evaluation Review Tool (In the appendix of this report) to help identify and integrate potential equity-focused concepts & alternatives. Identify and integrate potential equity-focused concepts and alternatives early in the process for consideration and evaluation.

Center Equity Focus Area voices in the process:

Center Equity Focus Area voices by conducting meaningful engagement and maintaining transparency and accountability throughout the planning process:

- Develop a community engagement plan centered around Equity Focus Area (EFA) geographies and demographics potentially affected (benefited or impacted)
- Partner with EFA-serving Community Based Organizations (CBOs) and community leaders at each step of the process, including setting the direction, scope, & approach.
- Communicate purpose, scope, and implementation timeline throughout the process, and inform participants and EFA stakeholders of how input received was incorporated.
- Create opportunities for ongoing feedback, evaluation, reporting, and iteration.

Assess for optimal equity outcomes:

- Identify who, what, where, when to focus on to address inequities & avoid further harm.
- Identify benefits & burdens of the activity and/or each alternative.

<u>Select strategies to advance equity</u> and avoid/minimize burdens:

		Finalize strategies based on the equity goals, outcomes, and performance measures, feedback obtained from equity voices, and analysis of benefits and burdens. Listen, reflect, report, and iterate:
		 Obtain perspective from equity stakeholders involved in the process, including opportunities for improvements for future efforts. Evaluate process and outcome equity effectiveness among lead and supporting agency staff, identifying lessons learned and adjustments for future efforts. Report results, lessons learned, and proposed changes to the design of the project, plan, or other activities to stakeholders involved in the process and to decision makers and advisory bodies through the new Equity Section in staff reports.
5	Footnote insertion	¹ Equity Focus Areas (EFAs) is a term used in this report to refer to geographies of priority based on high concentrations of community and demographic indicators of interest from an equity perspective. When stating "EFA voices" or "EFA geographies and demographics" in this report, we are broadly referring to communities and populations with less historic and existing representation, fewer resources, unequal social, economic, environmental, and health impacts and outcomes, and generally greater needs and barriers. Various federal, state, regional, and countywide agencies have their own unique geographic area mapping approaches, indicators, and nomenclature, including California's Office of Environmental Health Hazard Assessments (OEHHAs) CalEnviroScreen, the Metropolitan Transportation Commission's (MTCs) Equity Priority Communities (EPCs), and C/CAG's San Mateo County Countywide Bicycle and Pedestrian Plan (CBPP) EFA map.

5	2	Clarified language	Informed by the equity analysis, C/CAG will be taking the following steps to implement the report
			findings, including:
			 Applying an Equity Approach and using an Equity Evaluation Review Tool to help create
			standardized processes and practices around achieving equitable processes and outcomes
			across projects, plans, and programs.
			 Committing to an Action Plan (appendix VI), which includes 7 Equity Goals, 13 Outcomes, and
			36 Actions. Action Plan Goals include:
			These steps and best practices are reflected in the Equity Frameworks intended Goals, Outcomes, and
			Actions, which are an expression of both C/CAG's areas of growth and concrete commitments to
			maximizing the benefits of our work for populations in greatest need.

5	3	Integration of	Achieving equity outcomes requires continuous coordination, monitoring, evaluation, analysis,
		language from pg.	learning, and adjustments over time. The agency will regularly evaluate and report back to its decision
		3, paragraph 1	makers, advisory bodies, and community stakeholders, and adjust efforts as necessary. Many of the
			Action Plan's goals, outcomes, and actions will require a focused and sustained commitment, starting
			with the allocation of staff time, including in the form of a Staff Lead (Action 1), and financial resources
			in the agency's next budget (Action 6).
			To further support Framework implementation and coordination, C/CAG will convene the C/CAG
			Board of Directors (BOD) Equity Framework Ad Hoc Committee as needed (Action 2) and conduct an
			annual evaluation and update to the BOD, committees, and key stakeholders (Actions 3 and 4). In
			between the annual evaluation and update the BOD and committees, C/CAG staff will communicate
			benefits, burdens, and recommendations at the project, plan, program, and funding approval stage in
			a new Equity Section within staff reports (Action 21).
			C/CAG sees this Framework and Action Plan as a living document that will be updated no later than
			2030 as the agency progresses and new conditions and opportunities emerge.evolve over time and be
			updated before 2030.
6	Moved	Additional	Many of the Action Plan's goals, outcomes, and actions will require a focused and sustained
		language from	commitment, starting with the allocation of staff and financial resources towards high priority actions
		Action Plan	in the agency's next budget. The actions, which are significant in number, will not all be able to be
		section of report	implemented at once and will require ongoing monitoring, learning, and adjustments.
7	3	Additional text for	Compensated CBO's and other oorganizations participating in Community Working Group meetings
	_	clarification	included:

9	2	Additional text for greater accuracy	Although a new countywide EFA map using a range of indicators was originally envisioned as part of Task 2, it was determined that a separate countywide process would be needed in the next five years to develop such a map, with an extensive public and stakeholder engagement process. One of the next steps (Action 31) in the Framework is to update Equity Focus Area maps of each applicable C/CAG program area in 2025, and every five years thereafter based on available data, changing demographics and community conditions, EFA input, and other considerations. For the time being, C/CAG will continue to use the EFA map established through development of its Comprehensive Bicycle and Pedestrian Plan 2021.
			Another next step that was identified through this process is to align EFA mapping with that of other agencies, especially SamTrans (Action 32). Mapping alignment has been identified as an Action through this Project.
9	2	Word choice	Mapping alignment has been is identified included as an a next step in the Action Plan. through this Project.
9	Bullets	Additional language for clarity purposes	• Identification of equity impacts of C/CAG's work (expressed in the Existing Conditions section of this report).
10	1	Sentence structure	• A <u>series of P</u> procedural <u>Steps approach, to create greater</u> consist <u>encying of a series of steps, to help standardizein the application of equity in C/CAG projects, plans, and programs<u>around equity advancement</u>.</u>
12	2	Word choice	The period of colonization encouraged carried out by the Spanish, Mexican, and US governments resulted in thefacilitated and promoted theft of land, murder, and forced assimilation of Native people in what is now recognized by the State as a genocide (Executive Order N-15-19, 2019).
13	1	Brevity/sentence structure/word choice	The way we have planned and built our cities and decided who could own property in San Mateo County has-contributed to income inequality had negative implications, including worsening the wealth gap, public health disparities, and inequitable access to opportunities.

13	1	Brevity/word choice	Other race-based land use and housing laws, policies, and actions adopted and practiced across California, the Bay Area, and San Mateo County were persistent and extensive. These include, but were not limited to, exclusionary zoning, redlining, racial steering, covenants and homeowner association bylaws, and blockbusting, and transportation infrastructure investments.
13	2	Further explanation for clarity	Displacement From Infrastructure and Eminent DomainAs was the case across the US, dDiscriminatory actions in housing and land use policy and planning, and practices in San Mateo County were often paired with auto-oriented transportation planning and infrastructure investments that were designed to serve white and wealthier demographics and segregate and exclude resulting in further segregation and impacts to African American and other racial minorities. A clear example was the building of Highway 101 that further isolateddivided East Palo Alto and Belle Haven from the county's wealthier communities, while providing access to employment and other needs for those that were allowed to purchase land in the suburbs. The county's history of development also included opposition to regional public transit improvements that would provide greater access for working class and minority populations, most notably and historic opposition to public transit improvements serving more heavily working class and minority populations like-BART down the Peninsula.
13	5	Word choice for	Discrimination in Transportation Planning and Infrastructure Displacement From Infrastructure and Eminent Domain
12.16	4 12	accuracy	
13-16	1 - pg. 13 through pg. 16	Reorganization and word choice/sentence structure changes and Wove together separate sections into a more cohesive, streamlined and better organized	Discrimination in Land Use and Housing Laws, Policies, Practices, and other Actions The way we have planned and built our cities and decided who could own property in San Mateo County has contributed to income inequality has had negative implications, including worsening the wealth gap, public health disparities, and inequitable access to opportunities, and political disenfranchisement. Race-based land use, housing, and infrastructure planning and development laws, policies, and actions adopted and practiced across California, the Bay Area, and San Mateo County were persistent and extensive. These include exclusionary zoning, redlining, racial steering, covenants and homeowner association bylaws, blockbusting, and transportation planning (Moore et al., 2019). Racialized public and private actions created and reinforced segregation, including wealthy and white "high opportunity areas" and areas with high concentrations of low-income people of color and other

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narrative. Added additional language to increase clarity for the reader.

disenfranchised demographics referred to today by planners as Equity Priority Communities (EPC's) or Equity Focus Areas (EFAs). EFAs were often separated from white communities by space or infrastructure, located in flood zones or places less desirable for development, and/or in unincorporated areas of the county with little political representation.

Daly City, North Fair Oaks, Belle Haven, and East Palo Alto are four examples of San Mateo County EFAs that have historical documentation on discriminatory land use, housing, and infrastructure policies. North Fair Oaks, for example, has never been incorporated as a city or annexed by the surrounding cities, which has resulted in a historical lack of representation, affluence, infrastructure, public services, and commerce (Shoecraft, 2022).

It is important to note that while the examples cited here are illustrative of the kinds of policies and practices that affected communities across San Mateo County, such documentation is uneven geographically, and other local forms of racialized discrimination, marginalization, violence, and theft have likely not been captured in the literature.

It is also important to note that the examples provided in this historical summary continue into the present in different forms, resulting in the reproduction of unequal outcomes. Some, but not all, local, regional, and state governments are only relatively recently beginning to make meaningful commitments and attempting to make measurable progress in addressing these historical injustices and discriminatory actions

State Sanctioned Displacement

In addition to First Nations People, one of the first other another groups of people in San Mateo County and the Bay Area to be targeted early-on by federal, state, and local laws and policies resulting in loss of property or prevention of land ownership were Japanese Americans. "California adopted alien land laws in 1913 and 1920 with the purpose of driving Japanese farmers out of California agriculture and undermining the economic foundation of Japanese immigrant society" (Moore et al., 2019, p. 19-20).

Later, during World War II, Japanese Americans were forcibly removed from their homes and communities across the West Coast and placed in internment camps. The second largest temporary WCCA camp in the US was the Tanforan Assembly Center in San Bruno, which incarcerated 8,033 Americans of Japanese ancestry, mostly from the Bay Area (Linke, 2021). Forced internment... resulted

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in a massive loss of property and community in the Bay Area... The economic loss has been estimated at \$1–\$3 billion nationally (not adjusted for inflation). (Moore et al., 2019, p. 19-20)

Redlining, racial covenants, discriminatory lending, and homeowner association bylaws

Actors in the private sector and at all levels of government shaped the demographic make-up of communities across the region and the nation through multiple interlocking practices of exclusion such as redlining and federal lending policies. One of the San Mateo County communities cited in the literature is Daly City. The first homes in the Westlake subdivision in Daly City were sold in 1949 and were restricted to only white peopleOther race-based land use and housing laws, policies, and actions adopted and practiced across California, the Bay Area, and San Mateo County were persistent and extensive. These include, but were not limited to, exclusionary zoning, redlining, racial steering, covenants and homeowner association bylaws, blockbusting, and transportation infrastructure investments. (Moore et al., 2019)

Westlake in Daly City... was financed by the Federal Housing Administration... The only way you could [finance a development like Westlake] was to go to the Federal Housing Administration and make a commitment to never sell a home to an African American, to concede to the Federal Housing Administration's requirement that every deed in the home prohibit resale or rental to African Americans. And, on that basis, Daly City was built on a racially segregated, exclusively white basis... African Americans were instead concentrated in government created ghettos (Russo, 2020) Private homeowner association bylaws were another segregationist tactic prevalent in San Mateo County. These bylaws included racial covenants that restricted the sale or lease to certain ethnic groups such as Black, Latino, and Asian people. "Racially restrictive regulations remained within homeowner association bylaws in some instances as late as the 1990s and 2000s, such as... Cuesta La Honda in San Mateo County" (Moore et al., 2019, p. 35-37).

Racial steering and blockbusting

The real estate community played a significant role in establishing and maintaining segregated neighborhoods by directing potential buyers to certain neighborhoods based on race, a practice known as racial steering (Moore et al., 2019, p. 51-52). Peninsula realtors forced most of the county's African American population east of Highway 101 into Menlo Park's Belle Haven community and East Palo Alto (Moore et al., 2019, p. 49-50). Many African Americans and other racial minorities living in Belle Haven and EPA wanted to buy homes in other areas but were "blocked in their efforts by the concentrated efforts of peninsula realtors to keep them within these clearly defined areas east of

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Bayshore Highway" (Bradshaw, 2019). 16 Another real-estate strategy practiced in San Mateo County is referred to as blockbusting. Real estate investors would sow fears of racial change in neighborhoods such as East Palo Alto, causing the rapid depopulation of an area's white residents. Real estate agents then sold these homes at an inflated price to African Americans and other racial minorities seeking the few opportunities for homeownership available to them (Moore et al., 2019, p. 51-52).

Land use and housing policy

Beyond the more direct forms of racialized land use, housing, and infrastructure planning and investment strategies and actions above are less obvious but nonetheless damaging land use and housing policies and practices. These include common practices by San Mateo County cities of established large minimum lot sizes, growth boundaries, and housing unit caps, which have increased housing prices and excluded certain populations. For example, the Town of Atherton became one of the first jurisdictions in the county to establish minimum lot sizes (one acre minimum). Other cities soon followed suit (Moore et al., 2019, p. 34). Other land use and housing policy actions with implications on segregation, gentrification, and inequality include underfunding of affordable housing, inadequate renter protections, and the inadequate production of homes for people of lower and moderate incomes. The lack of political will to build sufficient housing while encouraging economic development and job growth has resulted in housing costs that are out of reach for many and is one of the root causes of gentrification and displacement pressures affecting formerly redlined low-income communities of color across the Peninsula (Rein, n.d.).

<u>Discrimination in Transportation Planning and Infrastructure</u>

As was the case across the US, discriminatory housing and land use policy, planning, and practices in San Mateo County were paired with infrastructure planning and investments that were designed to serve white and wealthier demographics and segregate and exclude African American and other racial minorities. Local municipalities and private sector actors, federal, state, and local agencies made infrastructure investments that further segregated and harmed African American and other racial minorities in areas like Belle Haven and East Palo Alto.

A clear example was the building of Highway 101 that divided East Palo Alto and Belle Haven from the County's wealthier communities while providing access to employment and other needs for those that were allowed to purchase land in San Mateo County's suburbs. The county's history of development also included opposition to regional public transit improvements that would provide greater access for working class and minority populations, most notably BART down the Peninsula.

-Displacement From Infrastructure and Eminent Domain Discriminatory actions in housing and land use policy and planning were often paired with infrastructure investments resulting in further segregation and impacts to African American and other racial minorities. A clear example was the building of Highway 101 that further isolated East Palo Alto and Belle Haven and historic opposition to public transit improvements serving more heavily working class and minority populations like BART down the Peninsula. Covenants and homeowner association bylaws It was not uncommon for private bylaws to include racial covenants that restricted the sale or lease to certain ethnic groups such as Black and Asian people. "Racially restrictive regulations remained within homeowner association bylaws in some instances as late as the 1990s and 2000s, such as... Cuesta La Honda in San Mateo County" (Moore et al., 2019, p. 35-37). 14 Racial steering and blockbusting The real estate community played a significant role in establishing and maintaining segregated neighborhoods by directing potential buyers to certain neighborhoods based on race (Moore et al., 2019, p. 51-52). Real estate investors would also sow fears of racial change in neighborhoods, causing the rapid depopulation of an area's white residents. Real estate agents would then sell the homes at a higher price to African Americans and other racial minorities, eager to find options for homeownership, an opportunity not widely available to them due to segregationist and exclusionary laws, policies, and practices (Moore et al., 2019, p. 51-52). Housing policy Housing policy implications on San Mateo County segregation and inequities include underfunding of affordable housing, inadequate renter protections, as well as the inadequate production of homes for people of lower and moderate incomes in relation to employment growth. Inadequate housing production has resulted in severe affordability impacts to lowincome populations and renters, who are disproportionately composed of people of color and other Equity Focus Area demographics. It has also been one of the root causes of gentrification and displacement pressures across the Peninsula (Rein, n.d.). Zoning Many cities established large minimum lot sizes, growth boundaries, and housing unit caps, which have increased housing prices and excluded certain populations. For example, the Town of Atherton is one of the most affluent in the county and was established with a minimum lot size of one acre in 1923. Other cities soon followed suit. (Moore et al., 2019, p. 34) Harmful Land Use Decisions and Poor Political Representation in Communities of Color in San Mateo County Communities Racialized public and private actions such as those cited above created and reinforced inequality and segregation, including today's Equity Focus Areas (EFAs). EFAs were often separated from white communities by space or infrastructure (such as Highway 101), located in flood zones or places less desirable for development, and/or in unincorporated areas of the County with little political representation. Daly City, North Fair Oaks, Belle Haven, and East Palo Alto are four examples of San Mateo County EFAs that have historically well documented race-based land

Errata of Changes Made to October C/CAG Board Draft Report C/CAG Equity Assessment and Framework Development Project Final Report

use, housing, and infrastructure policies. Perhaps the most well-documented example, thanks to the significant efforts of local historians, is East Palo Alto. It is important to note that many examples likely exist for EFAs in other parts of San Mateo County, but those stories have yet to be documented. 15 Daly City The first homes in the Westlake subdivision in Daly City were sold in 1949 and were restricted to only white people (Moore et al., 2019, p. 35-37). Author Richard Rothstein explains the connection between actors at various levels in both the public and private sector and the shape and make-up of Daly City. Westlake in Daly City... was financed by the Federal Housing Administration... The only way you could [finance a development like Westlake] was to go to the Federal Housing Administration and make a commitment to never sell a home to an African American, to concede to the Federal Housing Administration's requirement that every deed in the home prohibit resale or rental to African Americans. And, on that basis, Daly City was built on a racially segregated, exclusively white basis... African Americans were instead concentrated in government created ghettos" (Russo, 2020). But it wasn't just African Americans that were excluded from communities like Westlake, "it was anyone who couldn't pass as white. That included Filipinos... as well as Latinos and Asians" (Stupi, 2021a). Today, Daly City is a place with tremendous cultural diversity, including one of the highest concentrations of Filipino Americans in the U.S. "Filipinos began moving to Daly City in the 1950's but they were relegated to the area to the east of Junipero Serra [Boulevard]... Those older homes were often owned by Italian immigrants and were not part of redlined developments like Westlake" (Stupi, 2021b). North Fair Oaks In the southern portions of San Mateo County lie several EFAs, including the heavily Mexican immigrant unincorporated community of North Fair Oaks. North Fair Oaks has never been incorporated as a city or annexed by the surrounding cities, which has resulted in a historical lack of representation, affluence, infrastructure, public services, and commerce. (Shoecraft, 2022) Belle Haven & East Palo Alto Further to the south are the adjacent EFAs of Menlo Park's Belle Haven community and East Palo Alto. Peninsula realtors forced most of the county's African American population into these two areas (Moore et al., 2019, p. 49-50). Many African Americans and other racial minorities living in Belle Haven and EPA wanted to buy homes in other areas but were "blocked in their efforts by the concentrated efforts of peninsula realtors to keep them within these clearly defined areas east of Bayshore Highway" (Bradshaw, 2019). Local municipalities and private sector actors, federal, state, and local agencies made infrastructure investments, including highway building, which further segregated and harmed African American and other racial minorities in Belle Haven and East Palo Alto. Real estate industry actors then steered buyers who were people of color towards properties east of Highway 101 and white people towards properties west of the highway (Bradshaw, 2019). 16 The concentration of people of color and people of lower incomes into EFAs, such as Belle Haven and East Palo Alto, coincided with the placement of undesirable land uses, such as industrial

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facilities generating air, water, and noise pollution. Because many of these areas were unincorporated, residents had little power and representation to determine which uses to attract and which to exclude, which in turn resulted in inadequate services and infrastructure, and a prevalence of environmental burdens (Layton & Johnson, 2019, pg. 4). "San Mateo County cited a disproportionate number of harmful industrial projects in East Palo Alto, including the County landfill, the regional hazardous waste recycling plant, auto dismantling facilities and pesticide and herbicide producers" (Layton & Johnson, 2019, pg. 4). While these land uses benefitted the County, the economic and environmental consequences negatively impacted nearby residents. These examples provide evidence of some, but not all, forms of racialized discrimination, marginalization, violence, and theft within San Mateo County's history. While the examples cited in this summary are illustrative of the kinds of policies and practices that affected communities across San Mateo County, such documentation is uneven geographically. It's important to note that the examples provided in this historical summary continue into the present in different forms, resulting in the reproduction of unequal outcomes. Some, but not all, local, regional, and state governments are only relatively recently beginning to make meaningful commitments and attempting to make measurable progress in addressing these historical injustices and discriminatory actions. History of Social Justice Community Organizing in San Mateo County EPCs History of Social Justice Community Organizing in San Mateo County EFAs It's important to acknowledge that over the course of the history shared in this document, there is a

It's important to acknowledge that over the course of the history shared in this document, there is a parallel history of survival, resistance, resilience, and organizing.

-East Palo Alto, for example, is home to the Nairobi Movement, which made important local contributions and influenced activists across the nation and beyond (San Mateo County Libraries, 2022). Another often cited East Palo Alto example is Youth United for Community Action's (YUCA) successful campaign to close down Romic Chemical Corporation after decades of toxic contamination and health impacts in the community (Center for Health Journalism, n.d.).

Although East Palo Alto has a relatively well documented history of organizing and community empowerment, due in part to local efforts to document this history, diverse movements and campaigns for racial, economic, health, and environmental justice have also taken place over generations in EFAs across San Mateo County. These efforts, still to be fully documented, have helped move us closer to the ideals of democracy, equity, inclusion, and justice.

14	1	Deletion (word	Real estate investors would-also sow fears of racial change in neighborhoods, causing the rapid
		"also")	depopulation of an area's white residents.
14	2	Additional language for clarity purposes	The wide gap between housing production and demand is It has also been one of the root causes of gentrification and displacement pressures across the Peninsula (Rein, n.d.).
14	3	Sentence structure/brevity	For example, the Town of Atherton is o One of the most affluent cities in the county, and in 1923, became one of the first to establish minimum lot sizes (one acre minimum) was established with a minimum lot size of one acre in 1923. Other cities soon followed suit. (Moore et al., 2019, p. 34)
14	5	Word choice	Harmful Land Use Decisions and Poor inadequate pPolitical rRepresentation in Communities of Color in San Mateo County Communities
14	6	Minor modification to language	Daly City, North Fair Oaks, Belle Haven, and East Palo Alto are four examples of San Mateo County EFAs that have historically a well documented history connected to discriminatory land use, housing, and infrastructure policies. race-based land use, housing, and infrastructure policies.
15	2	Left indent for quote	Westlake in Daly City African Americans were instead concentrated in government created ghettos" (Russo, 2020).
15	4	Placement of punctuation	and commerce (Shoecraft, 2022).and commerce. (Shoecraft, 2022)
16	1	Туро	San Mateo County seited
17	2	Sentence structure	A multi-step mapping and data analysis process was taken to provide a snapshot of existing conditions related to C/CAG's program area themes. To provide a contextual point of reference for the development and implementation of C/CAG's Equity Framework, beyond the Historical Summary, a multi-step process was takenThis was done in order to provide a contextual point of reference for the development of C/CAG's Equity Framework beyond the Historical Summary. EFA maps and provide a snapshot of existing conditions related to C/CAG's program area themes.
17	3	Deletion - unnecessary language	Proposing a mapping and analytical approach

17	Moved side bar quote from pg.	Edited for brevity	To have any impact, the system needs to gain some flexibility to be reshaped into something that works not only for external folks but also for those that continue to maintain that system.
17	4	Additional language for clarity purposes	For the time being, C/CAG will identify underserved, underrepresented, and impacted communities by using regional, state, and federal agency maps (such as the Metropolitan Transportation Commission Equity Priority Communities map) and tools or its existing Comprehensive Bicycle and Pedestrian Plan 2021 Equity Focus Area map as applicable continue to use the Equity Focus Area map, developed though its Comprehensive Bicycle and Pedestrian Plan 2021, as the primary tool for identifying underserved, underrepresented, and impacted communities in the county (Active Transportation, n.d.).
18	1st bullet	Clarifying language	• IncomeWealth is unevenly distributed, with most communities of color experiencing significantly lower incomes overall than the white, non-Hispanic population. The exception to this is the Asian population, though subgroups within this demographic have not fared as well economically.poorer economic outcomes overall than the white, non-Hispanic population. The exception to this is the Asian population.
18	3rd bullet	Additional descriptive language	This can have a wide range of impacts, from transportation and childcare costs, higher exposure to infectious diseases such as COVID, to lesser ability to adapt to the local effects of climate change including exposure to extreme heat in outdoor working conditions. to lesser ability to adapt to the local effects of climate change.
18	side bar quote	Brevity	"It looks like families working 2, or 3 jobs to make ends meet and and multiple families having to share a home so they can make ends meet Inequality in my community means that your family, won't get a chance to experience the community you grew up in. Inequality feels like although we are trying to make a cChange, it is too slow, and we are being pushed further and further out of the community."
19	3	Sentence structure	Despite maintaining high employment, Hispanic/Latino populations have higher poverty rates and earn a median income that is much lower due to low wages, earn a median income that is much lower due to low wages, and have higher poverty rates.

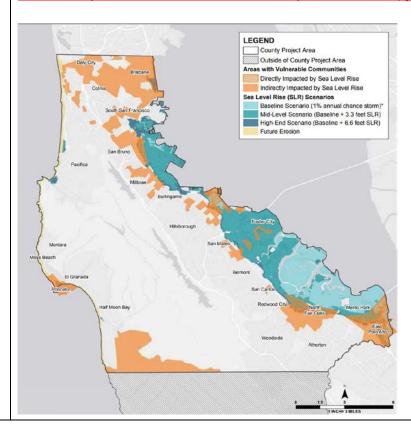
23	2	Footnote with clarifying	These statistics do not fully reflect changes in commute patterns since the COVID pandemic.
		language	
29	1	Changed map in draft to one that provides greater understanding of	
30-31	All	gentrification risk Added new sea	Climate
30-31	All	level rise map and language to accompany the map.	San Mateo County is acutely experiencing the impacts of climate change, including flood risks due to sea level rise, heat exposure due to prevalence of impervious surfaces (e.g., roads and parking lots), increasing wildfires, and loss of agriculture, and these impacts are expected to get worse over time. Sea level rise alone could result in the submergence of 183 hazardous materials sites, 2 power plants and 19 electric substations, 25 miles of rail and 350 miles of local roads, 45 schools, and 7 wastewater treatment plants in San Mateo County assuming 6.6 feet of sea level rise and a 1% annual chance storm (<i>County of San Mateo Sea Level Rise Vulnerability Assessment</i> , 2018). Some San Mateo County households may opt to migrate to areas of the country where risks and impacts are lower (Hurdle, 2022; Bittle et al., 2023). This option requires not only the financial means to do so, but other kinds of flexibility, such as the ability to work from home. Consequently, those with lower incomes may be left to bear the brunt of these hazards. As Figures 18 and 19 illustrate, many low-income households and other vulnerable demographics in San Mateo County will be impacted by the climate change. Figure 18 shows areas the County of San Mateo's Sea Level Rise Vulnerability Assessment, many areas with high concentrations of youth, seniors, people of color, people experiencing low income, people with limited education or English proficiency, households with a high housing and transportation cost burden, and rental households

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without access to a vehicle that are at risk of impending sea level rise. Figure 19 shows geographic areas of concern for both environmental risks and community demographics as identified by the California Environmental Protection Agency (EPA) and the White House Council on Environmental Quality. Priority focus areas include portions of East Palo Alto, North Fair Oaks, San Mateo, South San Francisco, and Daly City.

Figure 18: Vulnerable areas in San Mateo County at risk of inundation due to rising sea levels

Source: (County of San Mateo Sea Level Rise Vulnerability Assessment, 2018, pg. 103)



			Bayside communities – where most communities of color and low-income households in the county
			are located – are particularly vulnerable due to impending sea level rise.
			Some households may opt to migrate to areas of the country where risks and impacts are lower (Hurdle, 2022; Bittle et al., 2023). This option requires not only the financial means to do so, but other kinds of flexibility, such as the ability to work from home. Consequently, those with lower incomes may be left to bear the brunt of these hazards.
			Figure 18 shows geographic areas of concern in the climate equity and environmental justice context.
32	1	More concise language	It also includes a snapshot of what the equity-advancement experience of other agencies outside of San Mateo County are doing to advance equity, including some of the strengths and challenges of their own.
32	2	More concise language	 Planning for long range transportation improvements through the Congestion Management Program and Countywide Transportation Plan through its role as a Congestion Management Agency (CMA),
32	2	More concise language	 Developing the county's a Transportation Fund for Clean Air (TFCA) Expenditure Program for San Mateo County as Program Manager for AB434 40% Funds,
32	2	More concise language	 Responsibility for Leading the development and supporting the area's Hazardous Waste Management Plan and providing review and comment to the Integrated Solid Waste Management Plan through its role as a facilitator of the Integrated Solid Waste Management Local Task Force,
32	2	More concise language	The Service Authority for Abatement of Abandoned Vehicles, which includes managing a Reimbursement Program,
32	3	More concise language	C/CAG's members and representatives include has members and representatives from the County of San Mateo and each of the county's cities. Member Agencies include

32	3	Adjusted formatting to allow for text to	Atherton Woodside
		fit within the page	
34	side bar quote	Spell out acronym (SMC)	"We know we can never afford to buy in SMC, so we will continue renting for now and eventually get pushed out of the countyof SMC. Even if we could buy a place, the high prices would continue to be unattainable to so many in our community."
34	3	Word placement error	One Community Working Group (CWG) participant, convened as part of C/CAG's Equity Framework Project, participant expressed
36	1	Word insertion for greater accuracy	Energy production, transport, consumption, and disposal has local and global consequences.
36	2	Additional language for greater local relevance	The building of communities around the automobile has resulted in dependence and excessive use of fossil fuels, which in turnOil and natural gas extraction have contaminated ecosystems and communities locally and globally.
36	4	Brevity and clarity	Energy equity has emerged as a key factor limiting population-wide uptake and access to energy efficiency, electrification, and weatherization, including questions related to energy costs, access to efficient and healthy homes,* the lack of access to renters and low-income homeowners of energy efficiency, electrification, and clean energy programs that can help save money. Finally, the concept of energy equity has emerged in connection to energy efficiency and weatherization, including questions related to energy costs, access to efficient and healthy homes, the health implications of living near polluting power plants and other energy-related pollution sources, and who benefits economically the most from the energy sector (Drehobl et al., 2020, pg. 2-3). This includes the lack of access to renters and low-income homeowners of energy efficiency, electrification, and clean energy programs that can help save money.
37	3	Deletion (duplicate text from prior section)	 economic, health, and wealth disparities, housing affordability and homelessness, segregation, gentrification, and displacement, access to employment and other opportunities, climate change, and local and regional air pollution, and energy consumption.

41	1	More concise	The Vehicle Miles of Travel (VMT)/Greenhouse Gas (GHG) Mitigation Program is currently underway
		language	and will develop a menu of mitigations for reducing vehicle miles of travel (VMT)VMT and greenhouse
			gas emissions (GHGs) GHG emissions from infrastructure or development projects in San Mateo
			County with a focus on addressing needs and providing resources to low-income communities_EFAs
			("Scope of Work - Development of VMT/GHG Model Mitigation Program", 2022).
41	2	More clear	The Comprehensive Bicycle ke and Pedestrian Plan led to the establishment of C/CAG's first-Equity
		language	Focus Areas (EFAs) and included EFA equity criteria in the project prioritization process.
41	3	More concise	The San Mateo County Shuttle Program funds local shuttle services to address first/last mile
		language	connections to regional transit, address gaps in bus service to employment centers, and to address
			other-mobility needs of transit dependent communities. Project scoring criteria includes equity
			factors criteria that -account for a possible -25% of possible points in project scoring, - Equity scoring
			criteria require and require substantiation for how the project will benefit lower income communities,
			communities of color, seniors, or other vulnerable populations. (Shuttle Program Call for Projects Fiscal
			Year 2024/2025, 2023). In addition, all shuttles are free and open to the public.
41	4	More concise	The Safe Routes to School Program prioritizes school funding based on location within Equity Priority
		language	Communities (EPC's) & schools that usestudent free/reduced-price lunch enrollment free/reduced-
			price lunch.
41	5	More concise	21 Elements helps support cities in adopting pro housing policies with a focus is on addressing gaps in
		language	affordable housing production. creating housing where the greatest gaps exist in production -
			affordable housing. C/CAG along with the County Department of Housing co-founded the and provides
			ongoing funding for 21 Elements effort and continues to fund with the effort with the County
			Department of Housing. A significant focus has been on AFFH (Affirmatively Furthering Fair Housing)
			(AFFH) which includes an analysis of existing disparities. The initiative encourages cities to do more
			and betterimproved community engagement, in particular with with a focus on special needs
			populations (Home Page 21 Elements, 2023).
42	1	More concise	It The included a multi-phase public engagement process with included a series of pop-up events,
		language	focusing on diverse and multilingual populations. Outreach collateral was translated into multiple
			languages (Sustainable Streets Master Plan – Flows to Bay, 2023).
42	2	More concise	The Lifeline Transportation Program is aimed to funds projects that improve the mobility of low-
		language	income residents.

² Transit dependent populations are populations, communities, or individuals that are more reliant on transit systems for access and mobility. Various indicators such as age, income, and access to a private vehicle are used to determine dependency (Jiao & Dillivan, 2013).

42	4	More concise	The SMC Express Lanes Project constructed new express lanes along US 101 to reduce congestion,
		language	increase person throughput and improve travel time reliability. ³ An Equity Program was established
			that provides qualifying low-income participants with FastTrack transponders preloaded with \$100
			orand Clipper cards (all-in-one transit payment cards) pre-loaded with \$100. Reporting takes place to
			the Joint Powers Authority (JPA) Board through monthly program updates and periodic re-evaluation
			of program policies, and - Pperiodic updates are provided to community groups and to the public
			through paid media ads (Home Page San Mateo Express Lanes, n.d.).
42	Figure 21	Deleted in order	An Equity Program was established that provides qualifying low-income participants with pre-loaded
		to allow for space	\$100 FasTrak transponders preloaded with \$100 or and Clipper cards (all-in-one transit payment cards)
		for text to fit on	pre-loaded with \$100. Reporting takes place to the includes Joint Powers Authority (JPA)-Board
		page	through monthly program updates and, periodic re-evaluation of program policies, as well as and
			periodic updates to community groups and -the public through paid media ads-(Home Page San
			Mateo Express Lanes, n.d.).
43	2	Deletion	C/CAG's rRole in facilitating dialogue and collaboration across local municipalities:
43	3	Word choice for	Focus on achieving equitable outcomes in many of the efforts it leads: An abundance of existing
		more precise	equity oriented agency policies:
		language that	
		avoids overstating	

³ Express Lanes are designated highway lanes that are free to travel in for carpools, vanpools and other eligible vehicles and that give the option for solo drivers to pay a per-use toll to use the lane during designated hours of operation (What Are Express Lanes? What Are Their Benefits?, n.d.).

43	1	Language changes	C/CAG's role as a countywide funder:
		for greater	One of C/CAG's biggest assets in helping advance equity in San Mateo County is its role as an
		accuracy/clarity	infrastructure and programmatic funder. In some cases, C/CAG functions as the pass-through agency
			for state and federal funding to other countywide agencies and local governments. In these cases, it
			has varying levels of discretion in its approach to distributing the funds, including determining scoring
			criteria for equitable processes and outcomes. In other cases, when the source of funds is local, C/CAG
			has greater discretion in structuring the grant program. The One Bay Area Grant program and the
			Lifeline Transportation program are two examples of funding with equity stipulations that C/CAG
			administers. The San Mateo County Shuttle Program is an example of a C/CAG grant program where
			funds are obtained from local sources that include equity selection criteria.significant budget, much of
			which it distributes to other countywide agencies and local governments through its role as an
			infrastructure and programmatic funder. C/CAG has taken steps to increase equity requirements in the
			funding it passes through to local jurisdictions. C/CAG also has used its levels of discretion in
			structuring grant programs and allocating the funding to further equitable outcomes and engagement,
			including determining point allocations in competitive grant programs. The One Bay Area grant
			program and the Lifeline Transportation program are two strong examples of regional and state
			funding with equity stipulations that C/CAG oversees administering.
43	4	Language	Inclusion of equity criteria and other There are existing and rigorous equity criteria and
		adjustment for	measurements in plans, projects, programs , and funding calls:
		greater accuracy	
		and to avoid	
		overstating	
43	4	Word choice to	C/CAG requires the inclusion of incorporates equity indicators, metrics, or performance measures in
		avoid overstating	numerous projects and programs.
43	4	Brevity	and tracking program outcomes, including geographic and demographic participation participation of
			EFA demographics and/or geographies, (SMC Express Lanes Equity Program and Safe Routes to Schools
			Program).

43	4	Moved funding selection criteria language into paragraph 1	C/CAG requires the inclusion ofincorporates equity indicators, metrics, or performance measures in numerous projects and programs. The agency had led the way through several examples, like like utilizing equity criteria in program/plan prioritization offering points for equity outcomes and/or engagement in C/CAG funding programs (OBAG, the Lifeline Transportation Program, and the San Mateo County Shuttle Program), utilizing equity criteria in program/plan prioritization (Sustainable Streets Master Plan and Comprehensive Bike Ped Plan), and tracking program outcomes, including participation of EFA demographics and/or geographies, (SMC Express Lanes Equity Program and Safe Routes to Schools Program).
44	1	Language deletion for more conciseness and accuracy	Equity-informed human resources support Most C/CAG hiring & human resources functions are provided or supported by the County of San Mateo, which has increasingly strong internal equity systems and practices. C/CAG staff are encouraged to participate in equity training opportunities offered by the County.County provided hiring and human resources support that is imbued with equity best practices: Most C/CAG hiring & human resources functions are provided or supported by the County of San Mateo. The County has more staff resources and increasingly strong internal equity systems and practices due in large part to the County Executive's Office Equity Team. C/CAG staff are encouraged to participate in training and advancement opportunities, including those offered by the County.
44	1	Brevity/directness	Most C/CAG hiring & human resources functions are provided or supported by the County of San Mateo. The County has more staff resources and, which has increasingly strong internal equity systems and practices due in large part to the County Executive's Office Equity Team. C/CAG staff are encouraged to participate in equity training and advancement opportunities, including those offered by the County.

45	1	Language changes for greater accuracy/clarity	Challenges in influencing or determining how grant programs are implemented: Ability to set equitable agendas as a funder: Although C/CAG has the "power of the purse", it has limited influence over how the projects and programs it funds are implemented by cities and other local agencies. Successful equity advancement is highly dependent on the degree to which cities and other agencies receiving C/CAG funds prioritize and operationalize equity in their work. However Furthermore, local jurisdictions' representing Equity Focus Areas (EFAs) may have limited resources and staffing that can hinder their ability to apply for grants. Iimited resources and staffing hinder equity efforts including the ability for cities representing Equity Focus Areas (EFAs) to have capacity to apply for grants.
45	1	Word choice	However, Furthermore, local jurisdictions' limited resources and staffing can hinder equity efforts, including the ability for cities representing Equity Focus Areas (EFAs) to have capacity to apply for grants.
45	3	Langauge deletion (unecessary)	The agency has IL imited staffing resources:
45	4	More accurate langauge	Limitations and barriers to conducting equitable community engagement and establishing meaningful relationships with EFA CBO's: There is limited time to do meaningful community engagement and relationship development:
46	1	Language deletion (unecessary)	There are cConstraints in ensuring board, committee, and staff diversity and understanding of equity:
46	1	Brevity	Cities and county agencies also appoint many committee seats, whether it be city/agency staff or elected officials, reflecting similar challenges.
46	3	Clarifying language	Other factors limiting the diversity and capacity/understanding of C/CAG board, committee, and staff members include a lack of consistency in participation in equity training and onboarding opportunities.of equity training and onboarding.

46	4	Changes for better flow & clarifying language	A lack of agencywide procurement and contracting policies: can further inequitable contracting: C/CAG has no agency-level equity-oriented procurement or contracting commitments, standards, or practices.: That saidhowever, some specific project and program Request for Proposals (RFPs) have commitments for a minimum percentage of contract funding for Small Business Enterprise (SBE) and Disadvantaged Business Enterprises (DBEs). Typically, SBE and DBE requirements are set as guidelines in the original source of funds,: however, there is discretion but in some cases, there are untapped opportunities for C/CAG as the administering agency to go above and beyond the such requirements in some cases that are missed opportunities.
48	2	More accurate language	 Support cities in gaining <u>housing supportive community status through the Prohousing</u> <u>Designation Program "Housing Supportive Community" status</u> by sharing equity best practices and other strategies.
49	1	Brevity	In addition to looking internally within C/CAG to evaluate opportunities for the agency to advance equity, an external review of equity interventions and approaches was conducted to provide insights on strategies and actions that public agencies are using to advance equity. C/CAG staff and participants of Community and Agency Partner Meetings insights on strategies and actions that public agencies are using to advance equity.
49	3	Langauge deletion (unecessary)	The project team prioritized ten agencies for the review and developed a list of interview questions, followed by desktop research and agency staff interviews with staff at each agency to learn about each agency's policies, plans, programs, projects, and practices. Interviewees were then able to review. Draft agency profiles were created and shared with interviewees to ensure accuracy in reporting.
50	2	Sentence structure	While some agencies were already conducting equity-oriented work prior to 2020, many were not. <u>Tthe racial justice unrest and national dialogues on racism led by Black Lives Matter and other activists deeply affected local, regional, and state governments and agencies and inspired many to take <u>further</u> action.</u>
50	5	No need for capitalization	Internal <u>e</u> Equity efforts are not just external facing and strong internal infrastructure is needed to ensure success.

50	6	Word deletion	and other forms of support—first to agency staff and departments/divisions.
51	2	Punctuation	at the earliest stages of project/program design.
51	2	Further explanation for clarity	• Changing the way decisions are made and consulting with representatives and leaders of historically marginalized communities who is consulted at the earliest stages of project/program design,
52	1	More precise language	in the Appendix III of this report.
54	Second category	Clarifying language	Center Equity Focus Area voices by conducting meaningful engagement and maintaining transparency and accountability throughout the planning process: Maintain transparency and accountability and conduct inclusive and meaningful outreach and engagement throughout the planning process:
54	Bullets 4 & 6	Eliminate redundant language	Striking terms such as "when feasible" and "as applicable"
55	3	Language correction	to be updated as new conditions arise, such as new sources of data, new and emerging threats and impacts to racial and social equityto inequality and impacts to EFAs
59 & 120	Action 21	Use of broader langauge to allow for greater flexibility in reporting metrics	21. Establish equity reporting metrics relevant to C/CAG grant programs to evaluate and report on progress towards achieving equitable outcomes, including , but not limited to, the percentage of funds benefiting EFA geographies and/or demographics. the percentage of funds benefiting EFA geographies and/or demographics.
59 & 120	Action 22	Use more accurate language	22. Evaluate C/CAG grantmaking spending and consider changes to project selection criteria, including the number of points that are allocated for equity outcomes, equitable engagement, & the degree to which a local match for projects located in EFAs is required. required local match for projects located in EFAs.

61 & 124	Action 31	Examples of demographic indicators for consideration provided, including age, based on committee input	31. Update Equity Focus Area maps and associated demographic indicators such as race, income, and seniors 75 years and over for each applicable C/CAG program area within 5 years, and every five years thereafter based on available data, changing demographics and community conditions, EFA input, and other considerations.of each applicable C/CAG program area in 2025, and every five years thereafter based on available data, changing demographics and community conditions, EFA input, and other considerations.
62 & 125		More accurate language	Help SMC cities and the County meet equity standards in new state/federal requirements, including gaining obtaining HCD's Prohousing Designation Housing Supportive Community status, by sharing equity best practices and other strategies.
107	3 rd row	Definition of Priority Development Areas	PDAs are locally and voluntarily identified locations within existing communities that present infill development opportunities, and are easily accessible to transit, jobs, shopping and services (Association of Bay Area Governments & Metropolitan Transportation Commission, 2024).
108	3 rd row	More concise language	Planned and constructed 44 miles of new express lanes on US 101-from the Santa Clara County line to I-380 in South San Francisco. The Project's goal was to reduce congestion, increase person throughput, and improve travel time reliability for motorists on US 101 by incentivizing the use of public transit, carpools, and other shared ride options. The management and operation of the Express Lanes is governed by the San Mateo County Express Lanes Joint Powers Authority (SMCEL JPA), a six member joint powers authority consisting of three SMCTA Board members and three C/CAG Board members. Due to equity concerns, the JPA sponsored an Equity Study of the express lanes project that, which led to the creation of athe Community Transportation Benefits Program. The first phase of the program provides funding to provide or \$100 transit credit on a Clipper card (annual benefit) or a \$100 transit credit on a transponder (one-time benefit) to qualifying individuals who choose to enroll.
109	2 nd row	Definition	A non-recurring incident is a traffic incident, such as a vehicle crash, vehicle breakdown, or other special event, that causes a reduction in highway capacity and/or an increase in demand. Traffic incidents are a significant cause of congestion delays that motorists encounter every day on roadways (Amer et al., 2015).
124	Action 30	Clarifying language	Establishment of <u>public-facing</u> dashboard