



CLARK COUNTY WASHINGTON
PUBLIC WORKS



CLARK COUNTY ENVIRONMENTAL JUSTICE FRAMEWORK



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Clark County Public Works Department
Organizational Capacity for Environmental
Justice

Organizational Capacity for Equity Work

The Clark County Public Works Department (CCPW) has the goal of integrating Environmental Justice (EJ) principles and processes into its decision-making processes for all projects and programs, regardless of funding source. In order to accomplish this goal, CCPW must increase its capacity for EJ work. This section of the report sets the stage for integration of EJ Framework principles into CCPW processes by examining CCPW's workforce demographics in order to identify areas where there is currently misalignment between the demographics of the workforce and the demographics of people who live in Clark County.

On behalf of CCPW, PBS Engineering and Environmental Inc. (PBS) conducted the following two staff surveys, which generated quantitative measures via multiple choice questions, as well as qualitative information gathered through open-ended employee comments and suggestions.

Public Involvement Staff Survey

PBS conducted a Public Involvement Staff survey in December 2022 and distributed it to staff responsible for leading Public Involvement activities for CCPW. The Public Involvement Staff survey was sent to 32 people via email and 20 employees submitted responses. The survey instrument can be found in Appendix A.

Notable Results from Public Involvement Survey

Very few Public Involvement staff rated CCPW approaches as effective at engaging disproportionately affected communities.

Table 1. Staff-Rated Effectiveness of CCPW's DEI Approaches

Staff-Rated Effectiveness of CCPW Approaches Toward Engaging Disproportionately Affected Communities	Very Effective	Extremely Effective
Distribute Info	16%	0%
Gather Info	11%	0%
Other	0%	0%

DEI: diversity, equity, and inclusion

Public Involvement staff are much more likely than staff overall to have an understanding of, and experience with, EJ.

- 44% of Public Involvement survey respondents reported having a "solid understanding" of EJ, compared to 16% of staff overall.
- 61% of Public Involvement survey respondents reported having experience considering EJ principles when working on programs, plans, or projects, compared to 36% of staff overall.

Public Involvement staff respondents are not aware of any strong relationships between CCPW and organizations from disproportionately affected communities.

- This matches with the fact that 0% said "other approaches" are very or extremely effective.

Most Public Involvement staff report that resources are available for language translation and services for people with hearing impairment.

- 83% of Public Involvement survey respondents reported that language translation services are available.
- 55% of Public Involvement survey respondents reported that hearing impairment services are available.

11% of Public Involvement staff are aware of any culturally specific resources to support CCPW staff in their outreach to, and engagement with, disproportionately affected communities.

- This low-level of awareness may be because there are not many resources available to Public Works outreach staff or it may be because the resources that are available are not actively promoted.

Women are at least proportionately represented among the Public Involvement respondents. A high number of Public Involvement staff declined to respond to the gender and race/ethnicity questions.

- 22% declined gender and 50% identified as female.
- 17% declined race/ethnicity and 72% identified as white.

Hispanic/Latino people were not represented among the Public Involvement respondents. Black and Asian people were represented proportionally to the census or higher.

- 0% Hispanic/Latino, compared to 11% in the Clark County census.
- 6% Black, compared to 3% in the Clark County census.
- 6% Asian, compared to 5% in the Clark County census.

Table 2. Public Involvement Staff Demographics

Public Involvement Staff Demographics	CC Census	CC PI Survey
Black or African American	3%	6%
American Indian and Alaska Native	1%	0%
Asian	5%	6%
Native Hawaiian and Other Pacific Islander	1%	0%
Two or More Races	5%	0%
Hispanic or Latino	11%	0%
White	76%	72%
Decline Race	0%	17%

CC: Clark County; PI: Public Involvement

Employee-Generated List of Community Organizations for Public Involvement

Table 3. Employee-Generated List of Community Organizations for Public Involvement

Strengthen Existing Relationships	Initiate Relationships
Chinese American Community	Aging and Disability Resource Center

Strengthen Existing Relationships	Initiate Relationships
Developmental Disabilities Advisory Board	Center for Deaf and Hard Hearing Youth
League of United Latin American Citizens (LULAC)	Washington State School for the Blind
Clark County Food Bank	National Association for the Advancement of Colored People (NAACP)
The Cowlitz Tribe	Hispanic Metro Chamber of Commerce
Veterans Advisory Board	Latino Community Resource Group
Council for the Homeless	Community in Motion
Neighborhood Associations	Partners in Diversity

Employee-Generated List of Public Involvement Tools and Approached that Intentionally Seek to Connect with Disproportionately Affected Communities

- Public notices in languages other than English
- Limited English Proficiency (LEP) studies
- Advertising in publications for non-English-speaking members of the community
- Participation in events (e.g., parks and outreach staff talked with Washington State School for the Blind students about inclusive park design)
- Focus group/small group engagement
- Participation in coalitions (e.g., Lower Columbia Nature Network)
- Social media

Public Involvement with an Environmental Justice Lens

The Public Involvement survey revealed where there are resources available and what type of expanded capacity would be most helpful to further EJ efforts.

Strengths

- The respondents to the Public Involvement survey were much more likely than Public Works staff overall to have a solid understanding of Environmental Justice (44% versus 16%).
- The respondents to the Public Involvement survey were much more likely than Public Works staff overall to view Environmental Justice as often relevant to their work (50% versus 33%).
- The respondents to the Public Involvement survey were much more likely than Public Works staff overall to have experience with Environmental Justice work (61% versus 36%).
- The respondents to the Public Involvement survey were twice as likely to have language abilities in languages other than English than Public Works staff overall (50% versus 25%).
- Language translation and services for people with hearing impairment are readily available and used regularly by Public Involvement staff.

Challenges

- Public Involvement staff rated CCPW's approaches to, and relationships with, vulnerable communities as low.
- Very few of the staff are aware of culturally specific resources for outreach and engagement. This may be because those resources do not exist for employees or because the resources available are not well-promoted.
- None of the Public Involvement participants identified as Hispanic or Latino, which is the largest minority group in the county. It should be noted, however, that a relatively high percentage (17%) of respondents declined to identify their race/ethnicity. This could partly be due to concerns about being more easily identified individually from the smaller sample size than the all-staff survey. There were 20 responses to the Public Involvement survey and 180 responses to the all-staff survey.

Clark County Public Works Staff Survey

In January 2023, on behalf of the CCPW, PBS sent a survey to all CCPW employees (277 total) via email to gather demographics and information related to DEI principles. 180 employees submitted responses. The purpose of the survey was to analyze diversity and examine workforce representation. We compared demographic statistics of survey respondents with the most recent Clark County census data (2020). For historical context, we also referred to the Clark County Title VI Accomplishments and Goals Report from 2021,¹ which includes Public Works demographic data since 2017. The survey instrument can be found in Appendix B.

The data and analyses from this study provide a baseline the agency can use as it develops and implements strategies to increase its capacity to apply EJ principles and practices more widely in its work.

Notable Results from the All-Staff Survey

The majority of respondents are informed about EJ and perceive EJ as relevant to their work.

- 59% of survey respondents report having some knowledge or a solid understanding of EJ.
- 68% of survey respondents state that EJ is relevant to their job or workplace occasionally or often.

Leaders are more informed about EJ and are more likely to perceive EJ as relevant to their work.

- 76% of leaders report having some knowledge or a solid understanding of EJ.
- 73% of leaders state that EJ is relevant to their job or workplace occasionally or often.

Top Themes from All-Staff Survey Employee Comments

The following themes arose from the responses to the prompt **"If you have suggestions for actions Public Works could take to support DEI or EJ, please list up to three."**

- 48% – Increase/improve internal DEI and EJ resources (e.g., staff training)
- 24% – Increase accountability and improve policies, processes, and procedures
- 11% – DEI/EJ is not important, "made up," or detrimental
- 11% – Improve infrastructure investments in less-affluent neighborhoods
- 6% – Invest in strengthening community partnerships

¹[https://clark.wa.gov/sites/default/files/media/document/2022-12/Clark County 2021 Title VI Accomplishments %26 Goals Report.pdf](https://clark.wa.gov/sites/default/files/media/document/2022-12/Clark%20County%202021%20Title%20VI%20Accomplishments%20and%20Goals%20Report.pdf)

Environmental Justice Profile

In January 2023, on behalf of the CCPW, PBS sent a survey to all CCPW employees to gather demographics and information related to the other deliverables of this DEI project. To analyze diversity and examine workforce representation, we compared demographic statistics of survey respondents with the most recent Clark County census data (2020). For historical context we also referred to the Clark County Title VI Accomplishments and Goals Report from 2021, which includes Public Works demographic data since 2017.

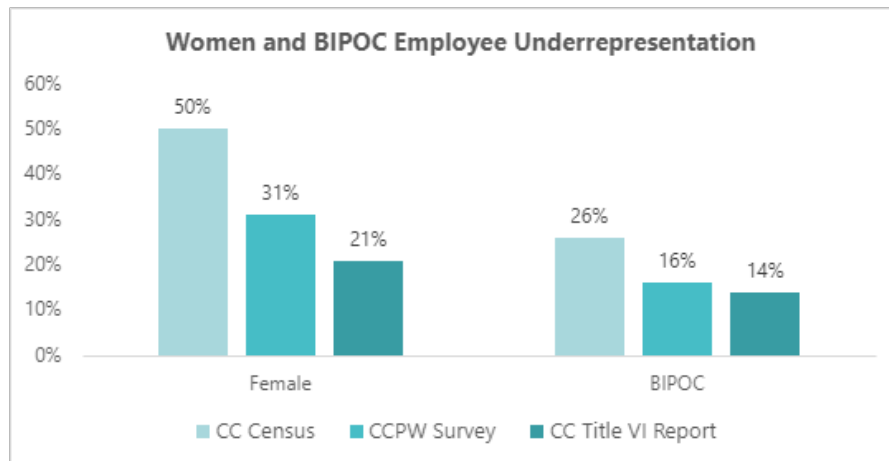
Notable Results from the Staff Demographic Profile

Women are underrepresented in CCPW

- 31% of survey respondents identified as female, compared to 50% in the Clark County census and 21% in the Title VI report.
- 60% of survey respondents identified as male, compared to 50% in the Clark County census and 79% in the Title VI report.
- 7% of survey respondents declined to identify their gender.

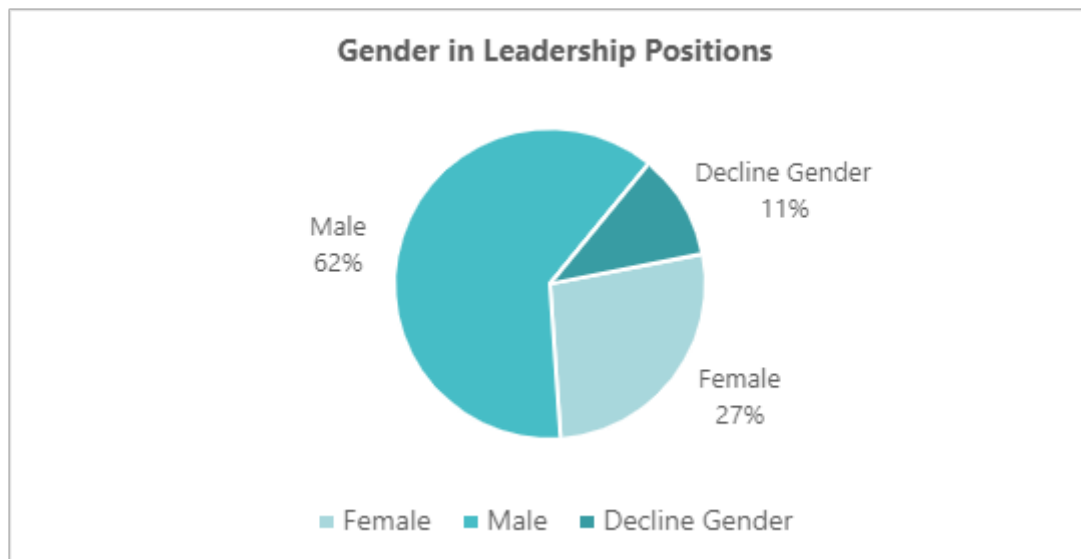
Black, Indigenous, and People of Color (BIPOC) are underrepresented in CCPW

- 16% of survey respondents identified as BIPOC, compared to 25% in the Clark County census and 14% in the Title VI report.
- 75% of survey respondents identified as White, compared to 76% in the Clark County census and 86% in the Title VI report.
- 10% of survey respondents declined to identify their race.



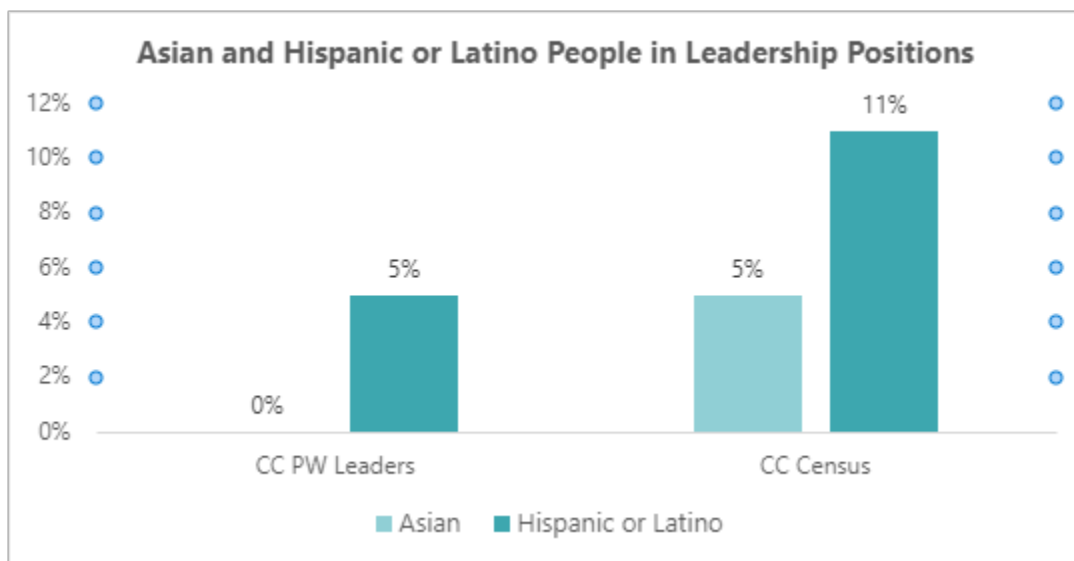
Women are underrepresented in CCPW Leadership

- 27% of survey respondents who are supervisors or managers identified as female, compared to 50% in the Clark County census.
- 11% of supervisors or managers declined to identify their gender.



Asian and Hispanic or Latino people are the most underrepresented racial/ethnic groups among CCPW leadership.

- 0% of survey respondents who are supervisors or managers identified as Asian, compared to 5% in the Clark County census.
- 5% of survey respondents who are supervisors or managers identified as Hispanic or Latino, compared to 11% in the Clark County census.
- 14% of supervisors or managers declined to identify their race.



Awareness and Relevance of EJ

68% of survey respondents reported seeing EJ as relevant, whereas 59% report having some knowledge or a solid understanding of EJ. This gap points to a need for EJ training for staff in general (not just supervisors).

Inequities, Injustices, Strengths, and Challenges

PBS assessed the strengths of CCPW in relation to EJ work and the challenges it faces by analyzing the data from the all-staff survey and the Public Involvement survey and by assessing the Public Participation Plan (PPP) of the Transportation System Plan (TSP). The following EJ principles were central to our evaluation:

- Avoid, minimize, and mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- Ensure full and fair participation by all potentially affected communities in the transportation decision-making process.
- Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Summary

The all-staff survey had a 65% participation rate, and the Public Involvement survey had a 67% participation rate, both of which fall in the moderate range. Participation rates below 50% are generally considered low. This means that CCPW can use the data from this research as a reasonable baseline to assess the progress of current and forthcoming EJ efforts. If the organization continues to increasingly emphasize the value of EJ principles, we expect future surveys on these topics to have higher response rates.

One of the strengths of CCPW that was demonstrated through the implementation of the surveys was the way that executive leadership modeled EJ practices by using strategies to make participation accessible to all employees. For example, the Public Works Director allocated resources to help make the all-staff survey accessible to as many employees as possible, by:

- Sharing the survey link via flyers posted in break rooms, common areas, and shops.
- Giving field teams access to computers or iPads to complete the survey.
- Asking supervisors to ensure staff are given time during the workday to complete the survey.
- Sending multiple reminders to staff, encouraging them to fill out the survey.

When employees create EJ community engagement plans, they should include similar approaches to reducing barriers for public participation:

- Meeting stakeholders where they are.
- Providing resources for stakeholders to provide input.
- Working with leaders from disproportionately impacted communities to facilitate stakeholder involvement.



Environmental Justice Framework

Environmental Justice Framework Introduction

The EJ Framework consists of strategies that integrate environmental justice into CCPW's procedures. It outlines the procedures, resources, and tools needed to support integration. This includes:

- Uses demographic data, information about environmental conditions, and health data to identify areas of concern for environmental justice.
 - Use community knowledge to verify and supplement data sources.
- Modify CCPW's approaches and improve procedures in order to address environmental justice issues.
- Target education and outreach. Promote and facilitate full and fair participation by all potentially affected communities in the transportation decision making process.

Definitions

Environmental Justice: The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.²

Fair Treatment: No group of people, including racial, ethnic, or socio-economic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs, and policies.

Environmental Justice Gap: The acknowledgement of an unequal distribution of environmental consequences and identification of what policies, resources, and actions are needed to achieve an equitable solution.

Advancing Environmental Justice in Washington State

To ensure environmental justice is a priority, the Washington State Legislature passed Senate Bill 5141/RCW 70A.02: the Healthy Environment for All (HEAL) Act in 2021.³ This historic, new law provides a coordinated state agency approach to reducing environmental and health disparities across the state. Agencies are required to integrate EJ principles, practices, and assessments into their actions including strategic plans, community engagement plans, and budgets. The HEAL Act offers standards of practices that will aid CCPW in their committed efforts to prioritize the involvement of affected communities in the decision-making process to provide equitable solutions.

Environmental Justice Goals and Objectives

The following EJ goals and objectives reflect CCPW's commitment to align its practices with EJ principles.

- Integrate equity and access considerations throughout regulatory activities.
 - Build staff understanding of critical EJ concepts and definitions to ensure alignment and deepen impact.
 - Minimize and/or mitigate unavoidable impacts by identifying concerns early in planning phases and using offsetting initiatives and enhancement measures to benefit the affected communities and neighborhoods.

² <https://www.epa.gov/environmentaljustice/learn-about-environmental-justice>

³ <https://app.leg.wa.gov/billsummary?BillNumber=5141&Year=2021&Initiative=False>

- Work with state, regional, local, and transit planning partners to create and enhance transportation systems and support projects that can improve the natural and human environments for low-income and minority communities.
- Improve data collection, monitoring and analysis tools that assess the needs of, and analyze the potential impacts on minority and low-income populations.
- Pursue innovative approaches to broaden access for, and increase engagement from, stakeholders.
 - Enhance outreach and public participation opportunities for vulnerable communities to meaningfully participate in all of Clark County's Public Works processes and projects.
 - Consider the specific needs of particular populations and work to create targeted engagement opportunities.
 - Implement methods that use an iterative approach and systematic feedback loops.

Environmental Justice Strategies

- Encourage use of facilities located in areas of concern for environmental justice to increase engagement with local government, community groups, and area residents, especially early on in the environmental review and permitting process, to understand and address concerns. Work with regulated parties to jointly explore ways to mitigate environmental and health-related impacts in the community and make other quality-of-life enhancements. Provide guidance to facilities on best practices for community engagement.
- Foster increased community involvement and actions on the part of the entities that we regulate.
- Employ public participation, engagement, and outreach tools for community groups and residents. Implement outreach and public participation tools identified in the public participation plan to ensure early and meaningful involvement, including:
 - Inform community members early and often using trusted, community-identified sources.
 - Explain the key decision points and how and when community members can have the most influence.
 - Provide easily accessible and understandable information to community members.
 - Actively seek to understand and address community concerns and ways in which our regulatory processes present obstacles to their participation.
 - Report back to community members on how their involvement was considered.

Strategies to Support Environmental Justice Integration

The following recommendations derive from the research and analysis portions of this report. They are designed to boost CCPW's current strengths as well as fill existing gaps. They relate to the following areas of capacity building:

- Applying an EJ Framework to All Projects – to integrate EJ principles into the development of project plans.
- Growing Knowledge, Skills, and Abilities – to build employee EJ qualifications and confidence.
- Institutionalizing Best Practices – to advance EJ priorities.

Recruit, Hire, and Maintain a Diverse Workforce

Implement best practices to recruit, promote, and retain individuals from underrepresented communities in order to create a more vibrant, diverse work force.

Strategies

- Agency training and development. Develop and maintain a workforce that is trained in environmental justice, values diversity, and delivers services in a multi-culturally competent, sensitive, and equitable manner.
 - Provide bias awareness training for all public involvement staff.
 - To help staff involved with EJ tasks gain tools to recognize biases that may currently be blind spots for them.
 - Train and develop all managers and staff in multicultural competency, institutional racism, environmental justice, Civil Rights Act Title VI requirements, and other areas identified that support CCPW's capacity to assure equal access and achieve equitable outcomes.
 - Train relevant program staff in procedures and policies to integrate environmental justice principles into their specific area of work. Collect employee feedback to monitor effectiveness of capacity-building and awareness-raising work.

Opportunities to Build Trust and Compromise

Ensure that discussions, particularly where there are conflicting views, are structured to allow for levels of compromise and consensus that will satisfy the greatest number of community concerns and objectives.

Strategies

- Ongoing stakeholder and community involvement in framework implementation and improvement. Feedback from a variety of stakeholders should inform improvements to CCPW's Environmental Justice work and all interested stakeholders have a satisfying level of access and opportunity to contribute.
- Environmental Justice advisory group. Establish an advisory group that meets regularly to provide feedback on framework implementation and to collaborate on ways to improve CCPW's strategies and implementation. This group will be made up of a variety of stakeholders working on community engagement, environmental Justice, health equity, and related work.
- Targeted engagement. As needed or requested, provide opportunities for additional stakeholder input and feedback.
- Environmental Justice events. Convene and sponsor events that provide opportunities for all stakeholders to learn, share experiences, and provide feedback related to Environmental Justice work.

Public Participation, Outreach, and Engagement

CCPW engages with community members to build authentic relationships, build trust, and involve all in a meaningful and accessible manner.

Strategies

- Build upon previous efforts to deepen community connections and understanding. Collaborate to foster supportive partnerships, authentic relationships, and culturally competent long-term engagement. Expand the network of community stakeholders that we interact with to ensure

representation from affected communities, and inclusion of as many community members and organizations working on environmental justice as possible. Encourage community members to be involved.

- Integrate EJ Goals and Objectives into all public involvement strategies/documents.
- Allocate resources (full-time employees) to building relationships with community organizations. Staff to work on finding ways CCPW can help bolster the capacity of those organizations to be more active in public involvement activities.
 - For example, they could develop strategies to try and increase participation of neighborhood associations from low-income areas.
- Tailor outreach and public participation to specific community. Seek to understand the community characteristics and specific barriers to meaningful involvement. Develop outreach and public participation to engage and inform the community. Use trusted and culturally relevant sources of information. Start communication with community members at the earliest possible opportunity.
- Use understandable language. Written materials, presentations, and informal communication should be easily understandable, free of jargon and undefined acronyms, and available in multiple languages when appropriate. Highlight the most relevant information and assist community members in understanding the technical aspects of our work.
- Hold community meetings and events early and frequently. In addition to and in advance of formal and required public meetings, employ a variety of formats early on and frequently to share information, listen to residents' concerns, and answer questions. Demonstrate how community input was considered.
- Expand public notification methods. During certain actions, such as some permits and rulemaking, CCPW is required to formally notify the public through specified traditional media. When Environmental Justice is of concern, CCPW will employ additional methods specifically tailored to that community as early in the process as practical, and as often as appropriate.
- Provide Proactive and Timely Opportunities for Involvement. Create multiple avenues for involvement that are open, meaningful, and organized to let people participate comfortably, taking into consideration accessibility, language, scheduling, location, and the format of informational materials.
- Establish Consistent Commitment. Communicate regularly and develop trust with communities, while helping build community capacity to provide public input, as needed.
- Establish and Maintain Partnerships. Develop and maintain partnerships with communities and community-based organizations through the activities described in the PPP.
- Use the EJ Framework (see Appendix) when planning public involvement activities for specific projects.
- Follow up on the concerns and recommendations identified in the Appendix—EJ Assessment of the TSP PPP

Environmental Justice Mapping Tools Accessible to Staff

EJ work must be contextualized at a local level by considering a variety of data including history and the lived experience of impacted groups. Tools provide access to different categories of data to help build that context.

- Use tools to help build the EJ context and identify low-income and minority communities. Use demographic information provided by the US Census Bureau, which conducts the US Census every 10 years to conduct and report characteristics of the entire population. The US Census Bureau also conducts the American Community Survey (ACS) every year for a smaller sample size to supplement Census data. Data is reported by geography. Tracts and block groups are reported in the tools listed below, and block groups are generally at a fine enough resolution to visualize how EJ shows up in different neighborhoods.
 - EJSCREEN: Environmental Justice Screening and Mapping Tool
 - Website: <https://www.epa.gov/ejscreen>
 - Organization: US Environmental Protection Agency (EPA) Data: Demographic, environmental, etc.
 - Overview: National Environmental Justice screening tool that combines demographic information (census block resolution) and environmental data to highlight potential places for further review. A Demographic Index is created by averaging minority and low-income variables. Environmental indicators are selected based on datasets collected by the EPA related to potential health effects and exposure to air pollution, lead paint, and proximity to waste and hazardous chemical facilities and wastewater discharge.
 - Environmental Health Disparities Map
 - Website: <https://fortress.wa.gov/doh/wtnibl/WTNIBL/>
 - Organization: Washington State Department of Health
 - Overview: Interactive mapping tool that compares communities across our state for environmental health disparities. The map shows pollution measures such as diesel emissions and ozone, as well as proximity to hazardous waste sites. In addition, it displays measures like poverty and cardiovascular disease. The map also provides new and rigorous insights into where public investments can be prioritized to buffer environmental health impacts on Washington's communities, so that everyone can benefit from clear air, clean water, and a healthy environment.

Environmental Justice Framework Form

The EJ Framework (in Appendix C) is a tool for CCPW to use in its efforts to develop projects that effectively align with EJ principles. It provides a method to proactively anticipate and overcome existing barriers to full community involvement and to avoid repeating historical inequities. It guides staff through a series of steps to:

- Identify the affected geographic area of a project.
- Gather demographics around the project area.
- Determine disproportionately high and adverse effects.
- Develop a community engagement plan.
- Select alternative/concept (if applicable).
- Prepare an Environmental Justice report, if needed.

The EJ Framework form reflects the County Public Works Department's desire to create a more inclusive and accessible public participation process. The EJ Framework will meet the following objectives: (1) elevate

diverse perspectives, (2) foster an inclusive environment, and (3) embrace an equity-centered approach across all it imitates.



Appendix A

Public Involvement Survey



Public Involvement Survey

At Public Works we strive to continuously improve our workplace and our ability to serve the community. We have contracted with PBS Engineering and Environmental to help us create a framework and identify resources to support these goals. As part of this project, PBS is seeking input from employees who participate in public engagement activities as part of their job. PBS is administering the survey and they will share a summary of the data collected, not specific answers, with the Public Works project manager and leadership. The survey should take between five and ten minutes to complete.

Disproportionately affected communities: Groups that often experience significantly higher rates and severity of adverse health and environmental effects from public and private infrastructure due to exclusion from economic, political and/or social opportunities. Examples include minority populations, low-income populations and indigenous peoples.

1. In your opinion, how effective have the following Public Works public participation approaches and activities been at engaging disproportionately affected communities such as low-income people, people of color, people with disabilities, native tribal members, etc.?

	Not at all effective	Somewhat effective	Neutral	Very effective	Extremely effective
Distribution of information/materials via websites, brochures, newsletters, etc.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information gathering via public meetings, questionnaires, advisory groups, etc.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other approaches and activities, such as collaborations.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. If you rated "Other approaches and activities" in the previous question as "Very effective" or "Extremely effective," please list up to three activities.

Activity 1

Activity 2

Activity 3

For the following questions, consider these characteristics of organizational relationships:

Strong Relationships = History of effective collaborations/representatives known by name.

Basic Relationships = Occasional interaction at public meetings.

Passive Relationship = Communicate only via mailing lists.

3. Does Public Works have **strong relationships** with community organizations from disproportionately affected communities? These could be non-profit human services organizations, places of worship, etc.

Yes

No

4. If you answered “yes” to the previous question, please list up to three organizations you consider to have a strong relationship with Public Works.

Organization 1

Organization 2

Organization 3

5. Does Public Works have existing relationships with community organizations from disproportionately affected communities that are **basic or passive** and that you think should be made stronger?

Yes

No

6. If you answered “yes” to the previous question, please list up to three organizations you think Public Works should work with to strengthen the relationship between the two organizations.

Organization 1

Organization 2

Organization 3

7. If you are aware of community organizations from disproportionately affected communities that you think Public Works should start new relationships with, please list up to three.

Organization 1	<input type="text"/>
Organization 2	<input type="text"/>
Organization 3	<input type="text"/>

8. As far as you know, what is the status of the following resources to support Public Works staff in their outreach to and engagement with disproportionately affected communities? These could be internal resources, vendors and contractors, etc.

	Don't know	Never available	Sometimes available	Always available
Language translation services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hearing-impaired services, e.g., sign language interpreters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Culturally specific services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please list up to three other available resources)

9. Are you aware of any other Public Works tools or approaches for public participation that intentionally seek to connect with disproportionately affected communities?

- Yes
- No

10. If you answered "yes" to the previous question, please list up to three relevant tools or approaches you are aware of.

Tool/Approach 1	<input type="text"/>
Tool/Approach 2	<input type="text"/>
Tool/Approach 3	<input type="text"/>

11. How informed are you about environmental justice (EJ) concepts and regulations?

- Never heard of it
- Heard of it, but don't know what it is
- Have some knowledge of it
- Have a solid understanding of it

Environmental justice: Fair treatment and meaningful involvement of all people regardless of race, color, national origin or income with respect to the development, implementation and enforcement of environmental laws, regulations, and policies.

12. How relevant is EJ to your job?

- Don't know
- Never relevant
- Occasionally relevant
- Often relevant

13. Do you have experience considering EJ principles when working on programs, plans, or projects?

- Yes
- No

14. Do you have language abilities (written or verbal) in languages other than English?

- Yes
- No

15. If you answered "yes" to the previous question, what language(s)?

Language 1

Language 2

Language 3

16. How would you describe your level of competency in that language(s)?

Level of Competency

Language 1

Language 2

Language 3

17. How do you describe your gender identity?

- Female
- Male
- Non-binary
- Decline/prefer not to answer
- Not listed, or I prefer to describe myself:

18. Do you identify as having a disability? (The Americans with Disabilities Act defines a person with a disability as a person who has a physical or mental impairment that substantially limits one, or more, major life activity.)

- Yes
- No

19. How do you describe your race or ethnicity?

- American Indian or Alaska Native
- Asian or Asian American
- Black or African American
- Hispanic or Latino/a
- Middle Eastern/North African
- Native Hawaiian or Pacific Islander
- White or European American
- Multi-racial
- Decline/Prefer not to answer
- Not listed, or I prefer to describe myself:

Thank you for your input. It is crucial to making this effort a success!



Appendix B

All Staff Survey



Diversity, Equity, and Inclusion & Environmental Justice Survey

Clark County Public Works Department (County) is collecting baseline information about the current state of the agency. The purpose of the survey is to gather input on how to continuously improve the workplace, and support staff in their role. The County has retained PBS Engineering and Environmental Inc. to administer this anonymous survey, and they will share a summary of the data collected, not specific answers, with the County project manager. The survey should take approximately 5 minutes to complete.

1. How do you describe your gender identity?

- Female
- Male
- Non-Binary
- Decline/Don't want to answer
- Not listed, or I prefer to describe myself:

2. Do you identify as having a disability?

- Yes
- No

3. How do you describe your race or ethnicity?

- American Indian or Alaska Native
- Asian or Asian American
- Black or African American
- Hispanic or Latino/a
- Middle Eastern/North African
- Native Hawaiian or Pacific Islander
- White or European American
- Multi-racial
- Decline/Don't want to answer
- Not listed, or I prefer to describe myself:

4. Do you have language abilities (written or verbal) in languages other than English?

- Yes
- No

5. If you answered “yes” to the previous question, what language(s)?

Language 1

Language 2

Language 3

6. How would you describe your level of competency in that language(s): Beginner, Intermediate, or Advanced?

Language 1

Language 2

Language 3

7. Are you a supervisor or manager?

- Yes
- No

8. How informed are you about diversity, equity, and inclusion (DEI)?

- Never heard of it.
- Heard of it, but don't know what it is.
- Have some knowledge of it.
- Have a solid understanding of it.

DEI Definition: DEI is a framework that promotes policies and practices that allow fair and equitable opportunity for everyone to be included and feel a sense of belonging. DEI includes an emphasis on groups who have historically been underrepresented or excluded from participation due to their identity.

- **Diversity: Representation—different people at the table**
- **Equity: Access—plans, programs, and projects provide equal possible outcomes**
- **Inclusion: Engagement and Belonging—people participate and feel welcome**

9. How relevant is DEI to your job and/or workplace?

- Don't Know
- Never Relevant
- Occasionally Relevant
- Often Relevant

10. How comfortable do you feel at work? For example, can you “be yourself,” or do you spend a lot of energy trying to “fit in?”

- Don't Know/No Opinion
- Not Comfortable
- Somewhat Comfortable
- Very Comfortable

NOTE: When filling out the following questions, think about policies, procedures, organizational culture, and professional relationships.

11. Are you aware of any DEI efforts occurring within Clark County government to improve the workplace? For example, employee resource groups, training about bias, etc.

- Yes
- No

12. If you answered “yes” to the previous question, how effective do you think the DEI efforts are at improving your workplace environment?

- Don't Know/No Opinion
- Not Effective
- Somewhat Effective
- Very Effective

13. Are you aware of any DEI efforts occurring within Clark County government to improve services to the public? For example, recognition of historical prejudice in government policies, performance measures about DEI, etc.

- Yes
- No

14. If you answered “yes” to the previous question, how effective do you think the DEI efforts are at improving the County’s services to the public?

- Don't Know/No Opinion
- Not Effective
- Somewhat Effective
- Very Effective

15. How informed are you about Environmental Justice (EJ) concepts and regulations?

- Never heard of it.
- Heard of it, but don't know what it is.
- Have some knowledge of it.
- Have a solid understanding of it.

Environmental Justice Definition: Fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

16. How relevant is EJ to your job?

- Don't Know
- Never Relevant
- Occasionally Relevant
- Often Relevant

17. Do you have experience considering EJ principles when working on programs, plans, or projects?

- Yes
- No

18. If you have suggestions for actions you would like the County to consider taking to support DEI or EJ, please list up to three:

Suggestion 1

Suggestion 2

Suggestion 3

Thank you for your input, which is crucial to making this effort a success!



Appendix C

Environmental Justice Framework

Environmental Justice Framework

The US Environmental Protection Agency's (EPA's) Office of Environmental Justice defines Environmental Justice as: "The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socio-economic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs, and policies."

Environmental Justice strengthens Title VI¹ by requiring federal agencies to ensure the consideration of Environmental Justice as part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority populations and low-income populations.

Clark County is choosing to integrate Environmental Justice principles and processes in their decision-making processes for all projects and programs, regardless of funding source.

Environmental Justice Framework

Several federal and state policies require Clark County to evaluate environmental justice when developing projects, programs, and policies. Included in these policies are Title VI of the Civil Rights Act of 1964, Executive Order 12898 Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations, and RCW 70A.02 Environmental Justice, also referred to as the Healthy Environment for All (HEAL) Act. A full list of federal and state policies guiding the evaluation of Environmental Justice can be found in the Washington State Department of Transportation (WSDOT) Environmental Manual. Likewise, the HEAL Act requires state agencies to incorporate Environmental Justice as part of the agency work. Because Clark County receives funding from state and federal agencies, the county too is required to address Environmental Justice when developing projects, programs, and policies.

To ensure that requirements for evaluating Environmental Justice are taken into consideration, Clark County is choosing to integrate Environmental Justice principles and processes in their decision-making processes for all projects and programs, regardless of funding source.

The following Environmental Justice information should be gathered and analyzed on all projects:

1. Identify the affected area.
 - a. The first step in the Environmental Justice analysis is determining what part of the community will be affected by the project.
 - i. The project area includes all areas physically disturbed by the construction/implementation of the project. However, the effects of the project on the community, during and after construction/implementation, may extend well beyond the project area.
2. Gather demographics around project area.

¹ *Title VI Requirements and Related Information*. Clark County. <https://clark.wa.gov/public-works/title-vi-requirements-and-related-information>

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- a. Use one or more of these tools to gather demographics data for the project area population.
 - i. EJ Screen² or Washington Environmental Health Disparities Map³ mapping tool.
 - ii. Census Data (American Community Survey [ACS] Summary Report).
 - iii. School Data (free and reduce lunch data).
 - b. May need to go beyond desktop analysis to fully understand affected community.
 - i. Level of effort should be commensurate with size and type of the project or scope of the program or policy.
 - c. Describe Environmental Justice population, if any.
3. Determine disproportionately high and adverse effects.
 - a. Identify adverse effects.
 - i. Adverse effect means the totality of significant individual or cumulative human health or environmental effects.
 - ii. Examples of adverse effects include air and water pollution, destruction, or disruption of man-made or natural resources, noise and vibration, changes in accessibility to/ from community, and effects on property values.
 - b. Determine whether effects are disproportionately high.
 - i. Are effects predominately borne by an Environmental Justice population or will effects on Environmental Justice population be appreciably greater in magnitude than effects on non-Environmental Justice population?
 - ii. Are Environmental Justice populations adversely affected by cumulative or indirect effects?
 - iii. If mitigation measures are proposed, do they offset effects for both Environmental Justice and non-Environmental Justice populations equally?
 4. Develop a community engagement plan.
 5. Select alternative/concept (if applicable).
 - i. Determine Environmental Justice mitigation.
 6. Prepare Environmental Justice report,⁴ if needed.
 - i. If not, document Environmental Justice Analysis findings in a memo.

² EJScreen. Environmental Protection Agency. <https://ejscreen.epa.gov/mapper/>

³ Information by Location, Washington Tracking Network. Washington State Department of Health. <https://fortress.wa.gov/doh/wtn/WTNIBL/>

⁴ *Chapter 460 Environmental justice - Environmental Manual M 31-11*. Washington State Department of Transportation. <https://wsdot.wa.gov/publications/manuals/fulltext/M31-11/460.pdf>



Appendix D

Environmental Justice Assessment of the Public Participation Plan of the
Transportation System Plan

Environmental Justice Assessment of the Public Participation Plan of the Transportation System Plan

This review of the Clark County (County) Transportation System Plan (TSP) Public Participation Plan (the PPP) through an Environmental Justice (EJ) Framework acknowledges strengths of the PPP while highlighting concerns, and offering recommendations to assist agency staff in better aligning the PPP with the following EJ guiding principles:

- Ensure full and fair participation by all potentially affected communities in the transportation decision-making process.
- Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Strengths

Including equity in the following aspects of the PPP helps ensure County staff will consider disproportionately affected community members and groups while engaging the public in transportation planning processes.

- The PPP includes several mentions of the intention to reach and include disproportionately affected communities and lists several strategies to do that.
- The goals of the PPP are clearly stated. Goals include informing and consulting, but not collaborating or creating a feedback loop with the public. While comprehensive EJ approaches recommend collaborations and feedback loops, it is a strength of the PPP that it is transparent about the limitations of its scope.
- The County will provide project information in multiple languages, per request.
- The footer on each page of the PPP is very well designed to offer accessible communication options for the public to contact the County.
- The Section on Environmental Justice and Title VI is good because they review laws that are important components of an EJ foundation for public agencies.
- The Social Justice and Equity section acknowledges that transportation projects may disproportionately affect vulnerable populations.
- The County's formation and utilization of a Sounding Board is a powerful way to engage some community members with deep dives into elements of the TSP. Materials from the Sounding Board are accessible to all via the internet.
- Written comments from the public will be tracked and shared with County officials.
- The Accessible Participation section outlines a wide range of public participation approaches and includes explicit mention of "providing low-barrier opportunities".
- The general list of stakeholders is broad, so as to include non-profit organizations, for-profit businesses, and governmental agencies, including tribal ones.
- The project timeline describes the steps on the path towards establishing the TSP overall.

Questions and Concerns

Consideration of the following items will help the County achieve the equity goals of the PPP.

- The PPP does not clarify if the County will allocate resources to actively expand outreach beyond the historic "normal." Is there a plan to do so?

- The "Access for All" section mentions that the "County will maintain a contact list of representatives of underserved populations and will communicate with groups and Committees where these representatives may meet." Does this list currently exist? Is it actively used? By whom? Are these contacts represented by the agencies listed in the Environmental Justice section only, or are there others?
- Diversity, Equity, and Inclusion was listed as a topic for the Sounding Board. Did that happen? Would the County benefit from expanding the audience for that Sounding Board session?
- The timeline includes "Community Feedback of Strategy Development." How does the County do this?

Recommendations

Performing the following actions will move the County forward on its path towards making outcomes of its work increasingly equitable for all residents. To accomplish these items the County will need to allocate additional resources to Diversity, Equity, and Inclusion activities.

- The PPP would be strengthened by adding more proactive activities to engage members of the community that have historically been left out.
- Provide translated materials up front, rather than only per request.
- Include a list (partial is ok) of contacts for underserved populations, as a standalone section in the PPP. Note that in the Environmental Justice section a list of agencies is listed, but no such list is included in the Access for All section. The EJ list is a good start but should be expanded.
- Invest time in developing and nurturing relationships with community leaders and organizations from disproportionately affected areas within the County. This effort could benefit not just the PPP, but potentially all County public stakeholder processes and activities.
 - Remove the reference to an accommodation form and rely on the accessibility option.