

## PLANNING COMMISSION

Agenda Item No.: 3  
Date: August 8, 2023

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TO: Planning Commissioners

FROM: Veronica Morones, Principal Planner

SUBJECT: 2022 General Plan Amendment Update: Draft Environmental Justice Policies and Final Draft Environmental Justice Communities

**REQUEST:** Provide feedback on the final draft environmental justice communities and direction on environmental justice policy development.

**BACKGROUND:** The City of Escondido is updating the General Plan's Community Protection chapter and creating a new environmental justice chapter under the 2022 General Plan Amendment ("2022 GPA") work effort, which kicked off at the end of 2021. The Escondido General Plan's Community Protection chapter serves as the Safety Element for purposes of meeting statutory requirements contained in Government Code section 65302. The City's new environmental justice ("EJ") chapter would overhaul the existing Community Health and Services chapter of the City's General Plan, which is an optional element (i.e., it is not a required element pursuant to Government Code section 65302). The chapter would be supplemented to incorporate environmental justice policies, goals, and objectives, while retaining existing applicable provisions. The creation of an environmental justice element is required pursuant to Government Code section 65302(h) and will include the identification of disadvantaged communities (Government Code § 65302(h)(1)) within the City of Escondido, as well as topics including reduction in pollution exposure, the promotion of public facilities, food access, safe and sanitary homes, physical activity, and civic engagement in the public decision-making process.

Community outreach and engagement is an integral part of the 2022 GPA work effort. Community outreach and engagement for the 2022 GPA is outlined, in both [English](#) and [Spanish](#), in the 2022 GPA outreach and engagement plan located on the 2022 GPA webpage: <https://www.escondido.org/2022-general-plan-amendment>.

As part of the 2022 GPA work effort, staff provide the planning commission with periodic reporting on the project's progress. Past planning commission meetings and their general content are provided below:

Prior Planning Commission Meetings:

- **December 14, 2021:** Kick-off of 2022 GPA
- **February 22, 2022:** Presented the draft outreach and engagement plan
- **July 26, 2022:** Presented outreach activities scheduled for the project in 2022
- **January 10, 2023:** Report out on outreach and engagement activities

**ENVIRONMENTAL JUSTICE BACKGROUND REPORT:** City staff prepared a background report outlining how staff identified environmental justice communities (“EJCs”) within the City. The background report also illustrates the methods staff will use to draft environmental justice policy.

Final Draft Environmental Justice Communities: Planning staff finalized draft environmental justice communities (“EJCs”) pursuant to Government Code section 65302(h), as outlined within the background report (Attachment 1). The environmental justice background report details the final draft EJCs and outlines the steps taken to determine these boundaries.

Environmental Justice Policy: The methods outlined in the draft background report identify general themes and direction for the environmental justice element’s forthcoming policies and goals. Based on these research methods, common themes identified include, but are not limited to: improving public facilities/amenities (including those to beat the heat), reducing air pollution, creating safe and affordable housing, providing adequate food access, and improving opportunities for civic engagement.

Staff requests direction from the Planning Commission regarding scope of environmental justice policy language. Under Government Code section 65302(h), environmental justice requirements include policies that specifically impact the environmental justice communities and aim to reduce unique or compounded health risks. Government Code section 65302(h)(1)(C) requires the City identify policies that prioritize improvements and programs that address the identified needs of the environmental justice communities. As noted in the background report, City staff reviewed other public draft and adopted environmental justice elements. Sample policy language from those jurisdictions is provided under Attachment 2 for reference.

## **NEXT STEPS**

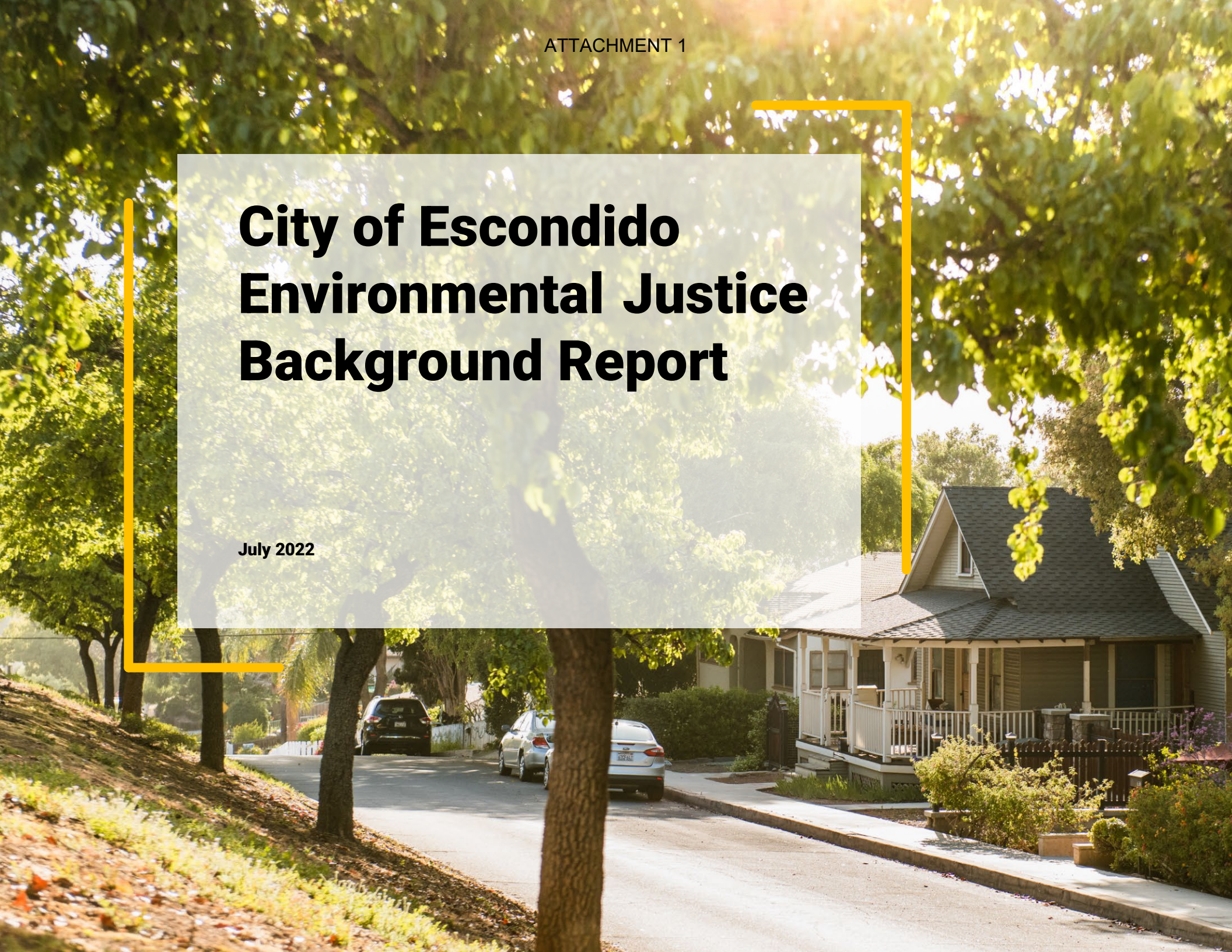
The environmental justice background report is currently available on the project webpage for public review and comment. Staff will consider and incorporate Planning Commission input and feedback on the draft policy direction. The City will kick off the environmental review phase of the 2022 GPA this month.

### Attachments:

1. Environmental Justice Background Report
2. Sample Policy Language

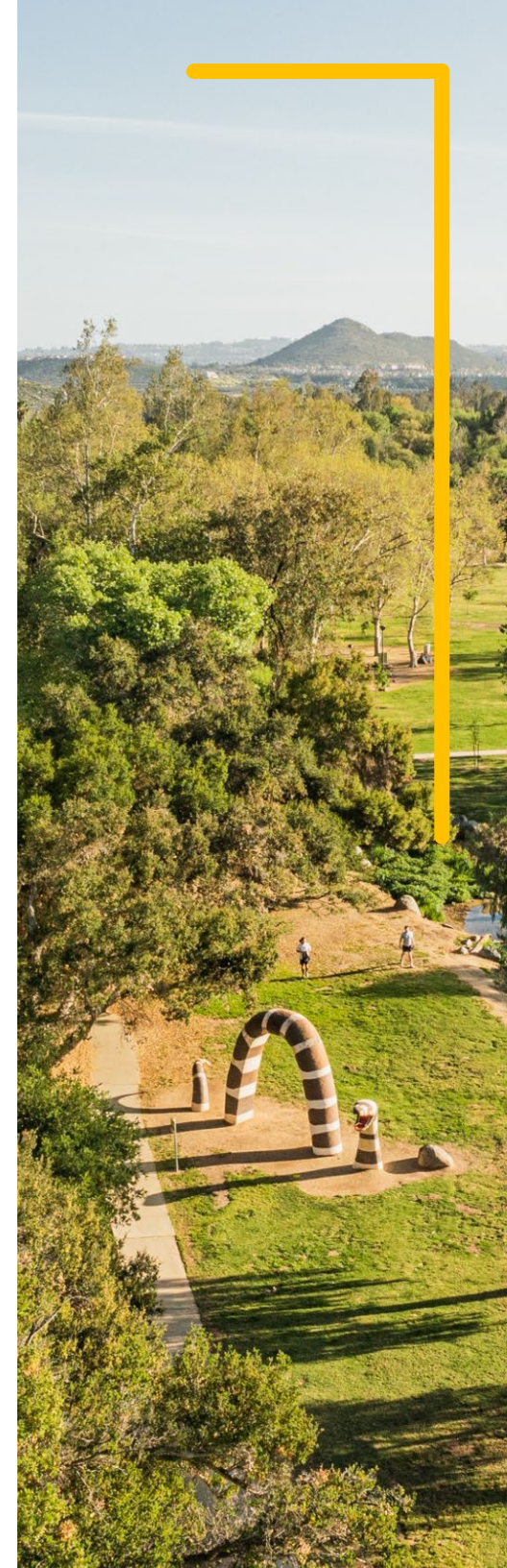
# City of Escondido Environmental Justice Background Report

July 2022



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# A. Introduction

## A.1 About Environmental Justice (EJ)

### A.1.1 What is EJ?

Environmental justice is a movement used to address communities that have disproportionately experienced greater environmental burdens and health hazards which can affect people's daily lives in order to improve the wellness of and ensure fair treatment for these communities.

The State of California specifically defines EJ as:

*The fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies (Gov. Code section 65040.12(e)).*

### A.1.2 Why is the City incorporating EJ?

*Senate Bill (SB) 1000 (Government Code §65302(h))*

In 2016, the California Legislature passed SB 1000, which aims to improve the health of local jurisdictions in California through an environmental justice element within the jurisdiction's General Plan. This made EJ a mandatory topic for jurisdictions if they trigger its requirements, which the City has done. The bill outlines the following key elements that must be addressed, at minimum; jurisdictions may choose to include additional topics if they choose.

- I. Pollution Exposure and Air Quality
- II. Public Facilities
- III. Food Access
- IV. Safe and Sanitary Homes
- V. Physical Activity
- VI. Community Engagement
- VII. Improvement plans for Disadvantaged Communities

As part of SB 1000, the City is required to identify "disadvantaged communities" within their general plan area. Under SB 1000, a "disadvantaged community" is:

*An area identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.*

Section 39711 of the Health and Safety Code defines DACs as:

*(a) The California Environmental Protection Agency shall identify disadvantaged communities for investment opportunities related to this chapter. These communities shall be identified based on geographic, socioeconomic, public health, and environmental hazard criteria, and may include, but are not limited to, either of the following:*

*(1) Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation.*

*(2) Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment.*

SB 1000 defines a "Low-income area" as:

*An area with household incomes at or below 80 percent of the statewide median income or with household incomes at or below the threshold designated as low income by the Department of Housing and Community Development's list of state income limits adopted pursuant to Section 500093.*

Since DACs bear a disproportionate burden from environmental and health hazards, they are targeted as the areas that need the most improvement and support. It is important to note why a DAC is considered “disadvantaged”. A key component of EJ is the context surrounding how certain communities ended up more burdened by environmental degradation and hazards than others. Policy (that is the course of action adopted and implemented by an entity, such as local, state, and federal governments) established by various agencies throughout history have had direct and indirect impacts to communities. In many instances, such policy has directly disadvantaged certain communities over others. As communities were built in accordance with such policy, those policies may have directly or indirectly caused those environmental burdens. For example, the policy decision to allow certain land uses adjacent to a neighborhood, such as industrial uses, may directly impact that residential neighborhood negatively. Environmental justice seeks to understand where the environmental burdens and hazards are and remedy any negative impacts through new policy direction.

### A.1.3 How do you identify DACs?

The State of California Governor’s Office of Planning and Research recommends 3 methods that can be used to identify DACs:

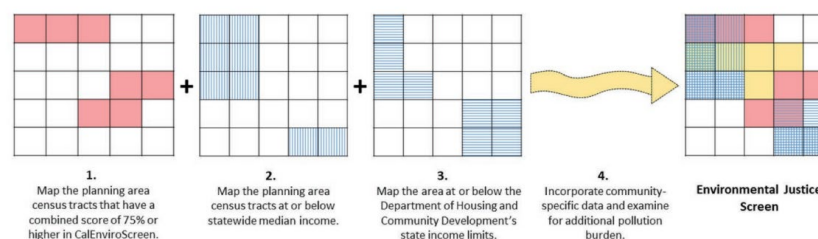
1. Use [CalEnviroScreen](#) to examine whether the planning area for the general plan contains census tracts that have a combined score of 75% or higher.

CalEnviroScreen is a standard mapping tool put forth by the California Office of Environmental Health Hazard Assessment to identify communities most vulnerable to pollution effects. It uses environmental, health, and socioeconomic information to produce scores for every census tract in California. CalEnviroScreen has a cumulative score for which factors indicators from two different groups: pollution burden and population characteristics. Both groups have a number of indicators under their umbrella which will be discussed in detail for Escondido’s specific EJ elements.

2. Map the household median incomes by census tract in the planning area at or below statewide median income and examine for disproportionate pollution burden.
3. Map the household median incomes by census tract in the planning area at or below the Department of Housing and Community Development’s (HCD) state income limits and examine for disproportionate pollution burden.

These 3 methods are then overlapped to create a base for qualifying areas within a jurisdiction, as shown in Figure 1. Once the base is established, a jurisdiction can then incorporate and analyze community-specific data and examine for additional pollution burden and health risk factors.

**Figure 1 – OPR’s Recommended Screening Process for Identifying Disadvantaged Communities**



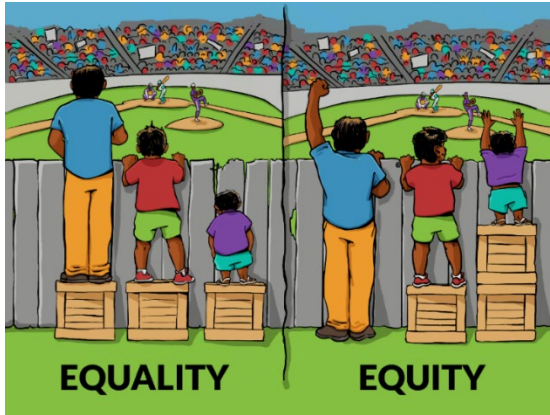
### A.1.1 Equity, Equality, Justice: What’s the Difference?

To help understand EJ issues and concepts, understanding what the difference is between equality and equity can help. Figure 2 below provides an illustrative analogy of equality versus equity.

*Equality* means that each individual or group is treated the same, such as being given the same resources or opportunities regardless of their identity or status.

*Equity* accounts for the differences in each individual’s or group’s starting point and provides them resources or remove barriers to reach try and reach a similar outcome.

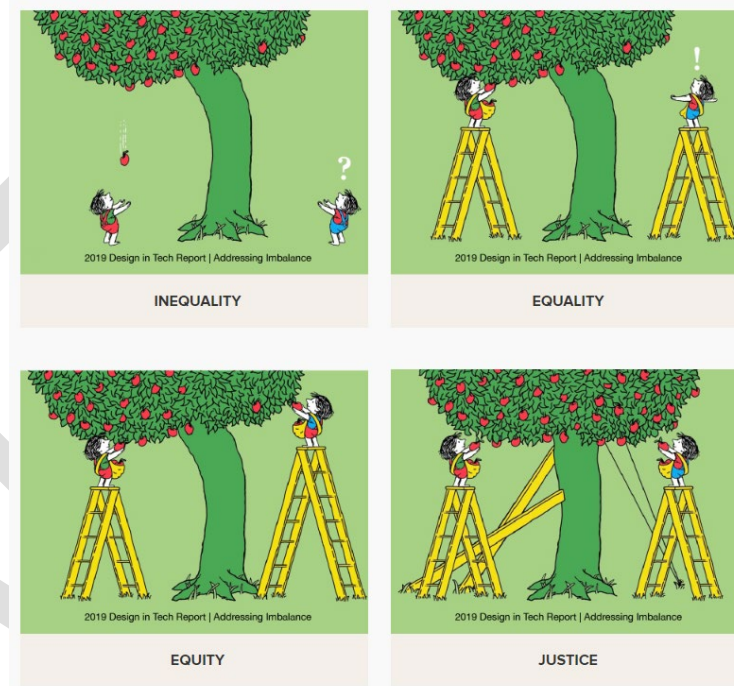
**Figure 2 – Equality versus Equity**



Source: <https://interactioninstitute.org/illustrating-equality-vs-equity/>

Justice can take equity a step further by developing or fixing systems to ensure sustainable, long-term opportunities or solutions for generations to come. Figure 3 below illustrates an example of these concepts.

**Figure 3 – Addressing Imbalances: From Inequality to Justice**



Source: <https://onlinepublichealth.gwu.edu/resources/equity-vs-equality/>

Because those within communities may have little say over the policy that impacts their community, they may not consider their neighborhood to be “disadvantaged” even though academic indicators suggest they are experiencing disproportionate environmental degradation. Therefore, the City of Escondido uses the term “Environmental Justice Community (EJCs)” as the name for those areas within the City that qualify as such.

## A.2 Related Efforts

### A.2.1 Sixth Cycle Housing Element

Escondido’s adopted housing element works to promote safe, affordable homes and inclusive, sustainable communities through its *affirmatively furthering fair housing* (“AFFH”) policies detailed in Program 3.4. A major component of this goal is the City’s *East Valley Specific Plan* (“EVSP”), a

specific plan created as part of the sixth cycle housing element for the purposes of accommodating the City's *regional housing needs allocation* ("RHNA"). The sixth cycle housing element's discussion of AFFH includes identifying *racially/ethnically concentrated areas of poverty* ("R/ECAPs") and *racially concentrated areas of affluence* ("RCAAs"), as defined by the State's 2021 Fair Housing Task Force.

The housing element identifies two R/ECAP census tracts located in central Escondido— tracts 202.13 and 202.14. These two tracts are located within the City's Downtown Specific Plan, where a bulk of the City's fifth cycle housing element allocated the fifth cycle RHNA's lower income housing units. As a result, the EVSP, along with the City's existing Downtown and South Centre City Specific Plans, accommodate the majority of the City's planned low- and very low-income development. As described in the sixth cycle housing element, this geographic pattern for low resource tracts in the center of the City correspond with the tracts that consist of a high concentration of low-income Hispanic population. These census tracts also contain a high concentration of single-female headed households. By contrast, tracts with moderate resources are those with married couples or married families with children, with a non-majority race composition. The sixth cycle housing element requires this planned concentration of lower income units within the City's urban core be mitigated through AFFH strategies, such as anti-displacement strategies and place-based improvements. The sixth cycle housing element identifies two RCAAs within the City, located in the southernmost tip of the City, immediately west of Interstate 15. In addition to the R/ECAPs and RCAAs, the City's semi-rural/suburban areas are considered moderate and low resourced according to HCD.

### **A.2.1 Escondido Climate Action Plan (2021)**

The City of Escondido maintains existing policy documents that include social equity frameworks, although in a limited context. The *Escondido Climate Action Plan* ("E-CAP"), updated in 2021, provides a robust examination of social equity and environmental justice through the climate adaptation planning lens. The E-CAP includes measures to improve the City's resilience to potential environmental risks and hazards that will be exacerbated by climate change, while seeking equitable climate change

adaptation solutions for all residents, businesses, and other community members.

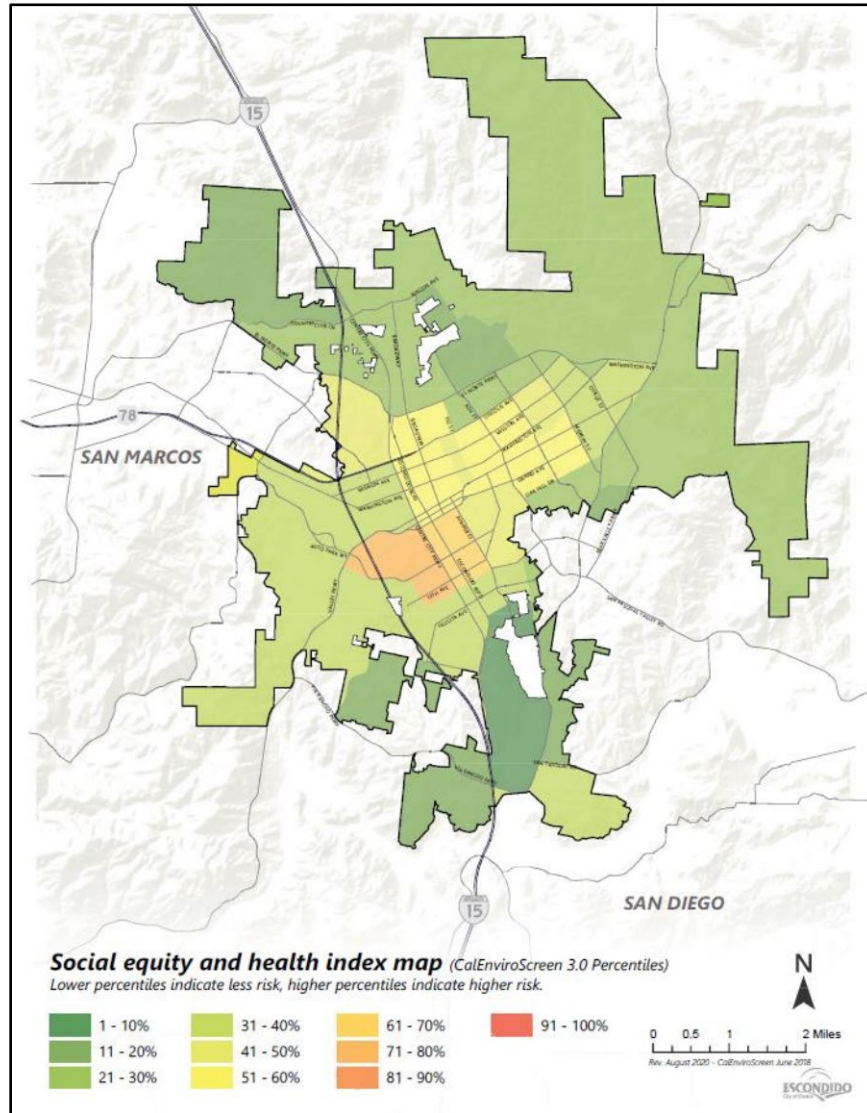
The E-CAP's Climate Adaptation Measure A-1.3 addresses the need to "hardwire social equity and environmental justice into new programs and projects." To aid in this adaptation measure, the E-CAP utilized the CalEnviroScreen ("CES") 3.0 data to create a Social Equity and Health Index Map, shown in Figure 4, intended to identify vulnerable neighborhoods needing additional focus and priority. These identified tracts are labeled "Priority Investment Neighborhoods" ("PINs") within the E-CAP. Using the Social Equity and Health Index Map (i.e., CES 3.0 scores), the City prioritizes neighborhoods with a CES 50 percent (50%) ranking for priority investments and early implementation of focused measures to support social equity and environmental justice. By focusing efforts on vulnerable neighborhoods and populations, the City seeks to provide equitable protection from environmental hazards and burdens.

The limitation of the Social Equity and Health Index Map is it utilizes CES data from a snapshot in time, whereas this type of data changes over time. This limitation is significant, as the City's E-CAP, and other existing policy documents discussed in this section, as well as this EJ element, contain policies seeking to remedy these existing issues.

The Office of Environmental Health Hazard Assessment ("OEHHA") is responsible for the CES tool and data, and released updated 4.0 CES data since the publishing of the Social Equity and Health Index Map. With this context, the City's PINs are apt to change over time. In order to facilitate equitable investment from the City overtime, the E-CAP's PINs will be assessed based on the most available CES data published by the OEHHA.



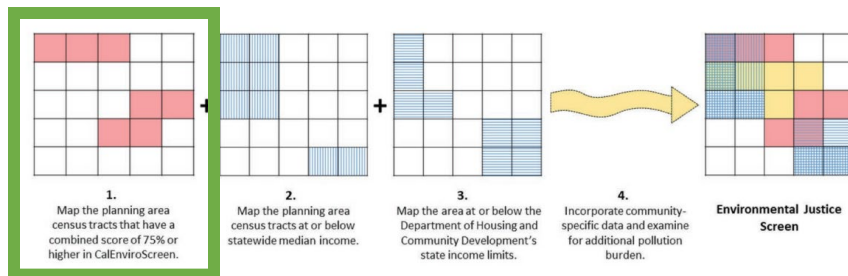
**Figure 4 – E-CAP Social Equity and Health Index Map**



# B. Identifying Environmental Justice Communities (EJCs) in Escondido

## B.1 Methodology

### B.1.1 Step 1: CalEnviroScreen



The first step recommended by the State in identifying qualifying communities is through CalEnviroScreen. Specifically, those census tracts with a cumulative score of 75% or higher. Under CalEnviroScreen, the cumulative score means that a tract experiences greater environmental burdens than that percentage of all other California census tracts. For example, a tract with a 75% score means they are more environmentally burdened than 75% of all other census tracts in the state. The higher the score, the higher the pollution burden an area experiences compared to a lower score with a lower pollution burden. However, the City's adopted Climate Action Plan ("E-CAP") identified Priority Investment Neighborhoods (PINs) using CalEnviroScreen scores and establishes a threshold of 50%. For the purposes of the EJ element a more stringent 50% cumulative score or higher will be used instead of the State recommended score of 75% to ensure consistency with the E-CAP.

Based on the City's established 50% threshold under the E-CAP, 10 census tracts qualify with cumulative CalEnviroScreen scores ranging from 50 to 65, as shown in Table 1. Figure 5 below shows the 10 tracts generally within the City.

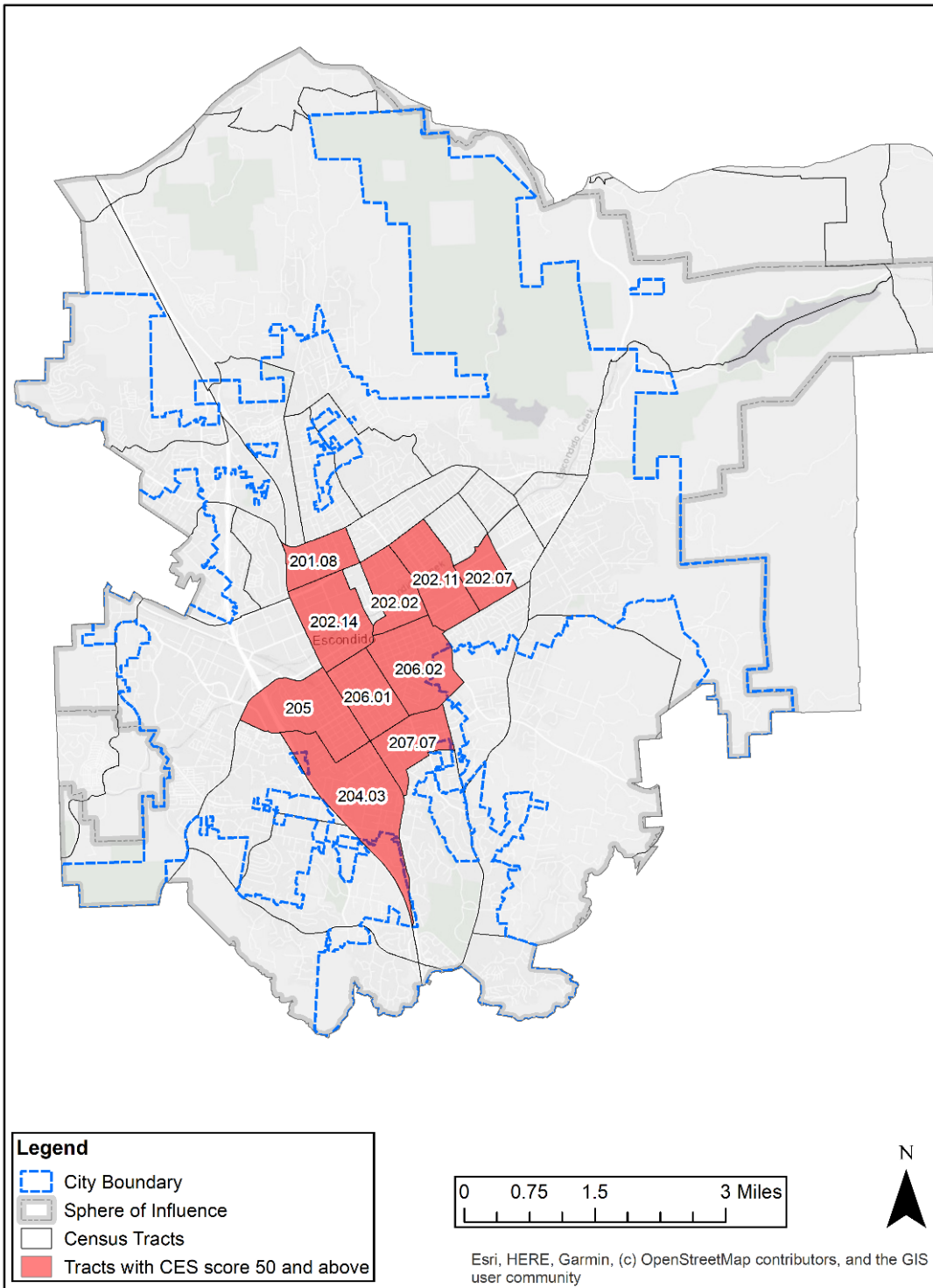
Census Tract	Pollution Burden Score
205	65
202.14	61
202.02	59
202.07	58
206.02	58
202.11	55
206.01	54
207.07	52
204.03	52
201.08	50

Disadvantaged Communities (DACs) and Environmental Justice Communities (EJCs) are used interchangeably in this paper. Because those within

communities may have little say over the policy that impacts their community, they may not consider their neighborhood to be "disadvantaged," even though academic indicators suggest they are experiencing disproportionate environmental degradation. Therefore, the City of Escondido utilizes the term "Environmental Justice Community (EJCs)" as the name for those areas within the City that qualify under the State's DAC definition.

The City's EJCs (aka DACs) and the E-CAP's Priority Investment Neighborhoods (PINs) are not used interchangeably. While the E-CAP identified PINs based on a 50% CalEnviroScreen threshold, it is the only criterion used for determining the PINs. Under SB 1000, CalEnviroScreen is one of three criteria, making the identification of the EJCs a more detailed and robust analysis. The PINs will be considered and referenced throughout the City's EJ policies; however, they should be thought of as a precursor to the EJCs. There may be PINs that overlap with EJCs, and there may be areas where a PIN does not qualify as an EJC.

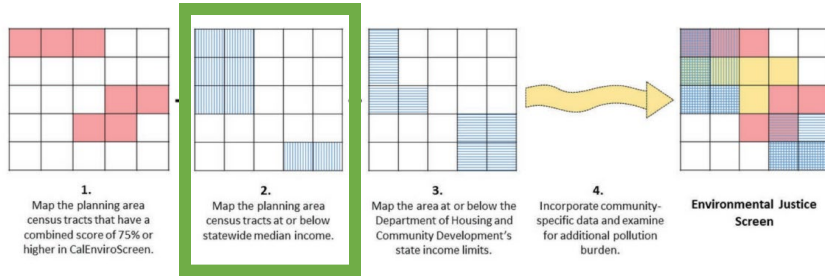
# Tracts with Pollution Burden Score of 50% or above within the General Plan Area



Source: CalEnviroScreen 4.0, retrieved from (<https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>)

07212022\_BaseMap

**B.1.2 Step 2: Household Median Income At, or Below Statewide Median Income**



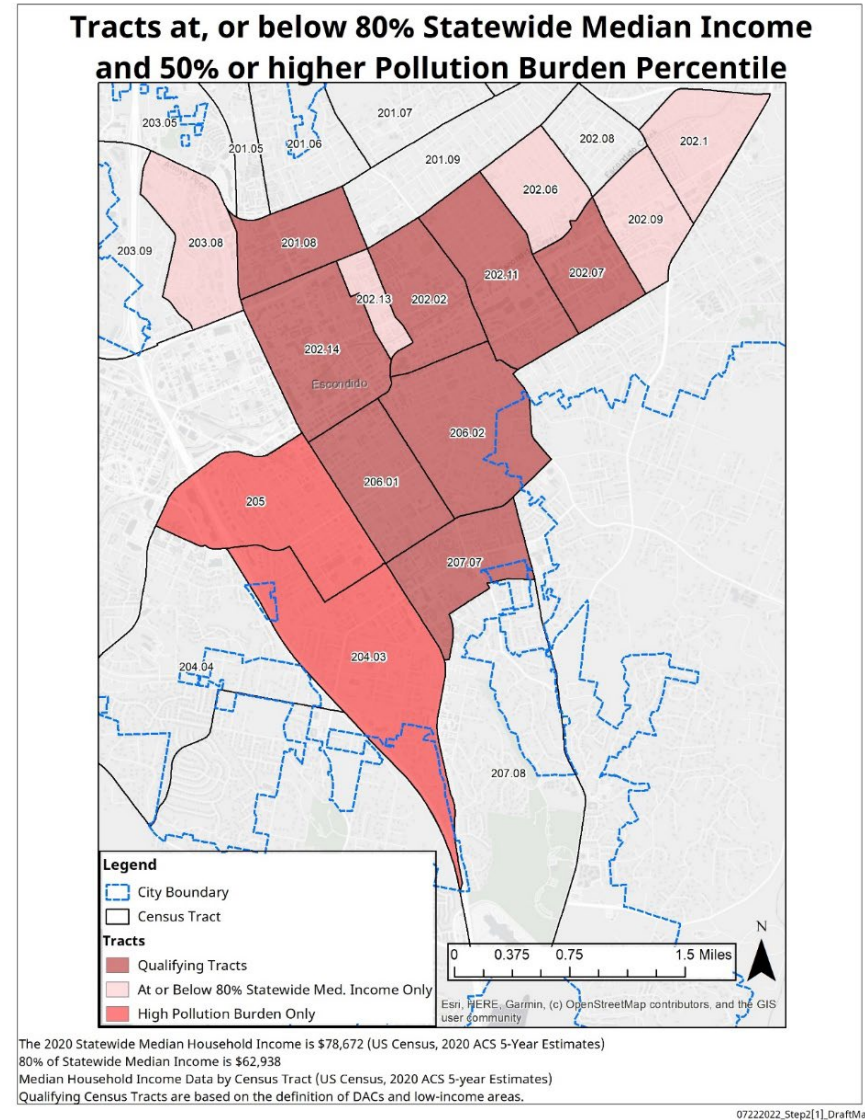
Step 2 in the State’s guidance entails identifying census tracts that have household incomes at or below the statewide median income. Based on the American Community Survey (ACS) 2020 5-Year Estimates, the statewide median income for 2020 was \$78,672. Using the SB 1000 definition of a “low-income area” a threshold of 80% was applied to the 2020 median income. Therefore, census tracts at or below \$62,938, which is 80% of the Statewide median household income, is considered low-income for the purposes of this analysis.

The identified tracts qualifying as low-income areas were overlaid on top of the CalEnviroScreen qualifying tracts utilizing GIS to identify overlaps between the two. A total of 8 tracts were identified as overlapping, as shown in dark red in Figure 6 and listed in Table 2.

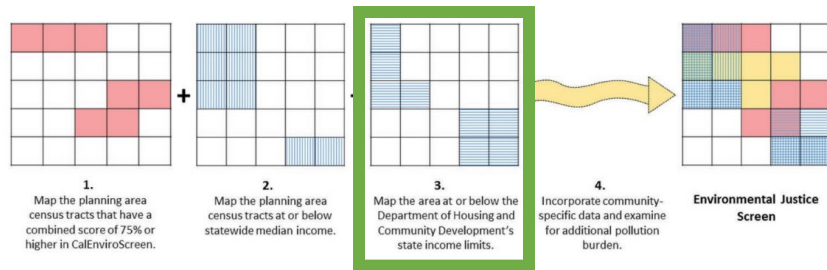
Census Tracts	Median Income <sup>1</sup>	Pollution Burden Score
202.14	\$26,735	61
201.08	\$60,242	50
202.02	\$38,920	59
202.07	\$46,762	58
202.11	\$52,422	55
206.01	\$54,063	54
206.02	\$56,978	58
207.07	\$49,764	52

<sup>1</sup>Median Incomes sources from 2020 ACS 5-Year Estimates

**Figure 5 – Step 2 Results**



### B.1.3 Step 3: Household Median Income At, or Below HCD's State Income Limits



Similar to Step 2, the next step in the recommended process for identifying EJs is to map the census tracts at, or below, the state income limits published by HCD. The State Income Limits vary by household size for each county and provide income thresholds for 'Acutely Low,' 'Extremely Low,' 'Very Low,' 'Low,' 'Median,' and 'Moderate' income categories. At the time of this analysis, the 2022 State Income Limits were the most recently published limits, as shown in Figure 7.

The average household size for each census tract was used to determine the appropriate income threshold for each census tract. For example, if the Census data showed a tract's average household size as 3, the Low-Income value under column '3' of Figure 7 was applied to determine whether that tract qualified as low-income for the purpose of this analysis. Average household size is from the 2020 ACS 5-Year Estimates data (B25010), rounding based on .5 increments to the nearest whole number.

Again, the qualified tracts meeting the low-income threshold under the HCD limits were overlaid on top of the CalEnviroScreen qualifying tracts utilizing GIS to identify overlapping tracts. A total of 9 census tracts were identified as overlapping, as shown in Figure 8 and detailed in Table 3. While Tract 205 exceeded the 80% Statewide Median Income by less than \$5,000, it meets the HCD low-income threshold limit.

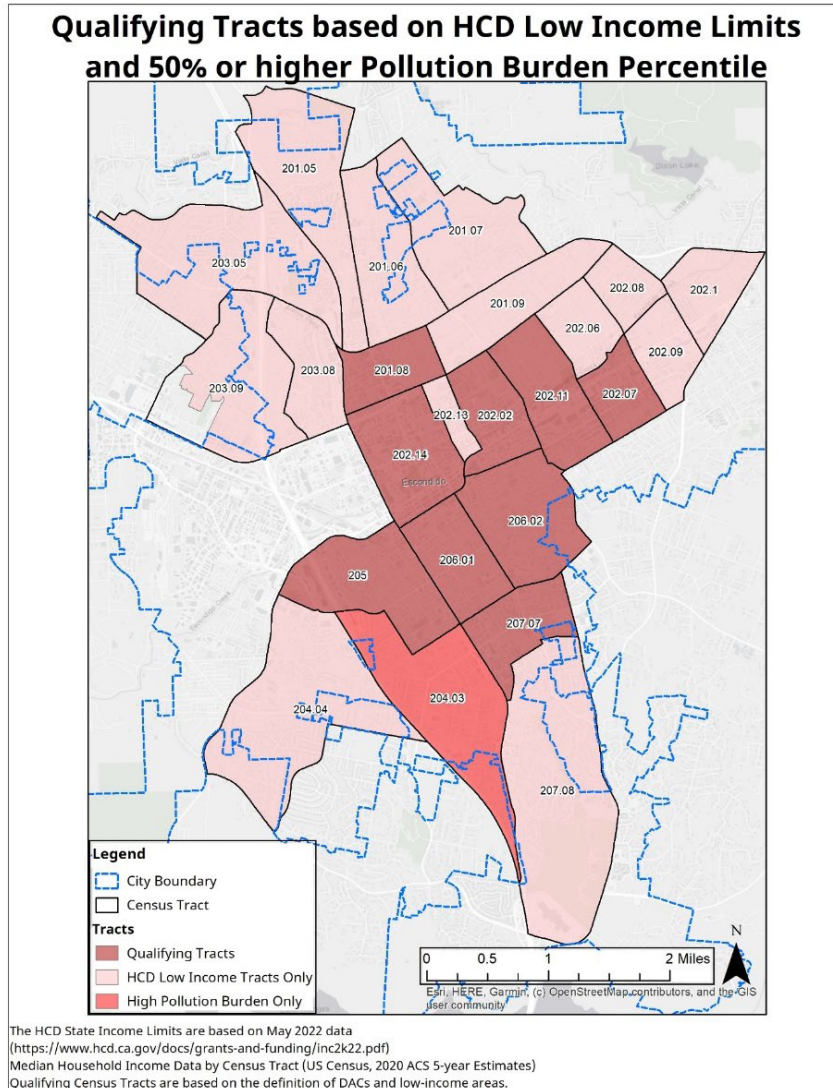
Figure 6 – HCD 2022 State Income Limits

Number of Persons in Household:		1	2	3	4	5	6	7	8
San Diego County Area Median Income: \$106,900	Acutely Low	11250	12850	14450	16050	17350	18600	19900	21200
	Extremely Low	27350	31250	35150	39050	42200	45300	48450	51550
	Very Low Income	45550	52050	58550	65050	70300	75500	80700	85900
	Low Income	72900	83300	93700	104100	112450	120800	129100	137450
	Median Income	74850	85500	96200	106900	115450	124000	132550	141100
	Moderate Income	89800	102650	115450	128300	138550	148850	159100	169350

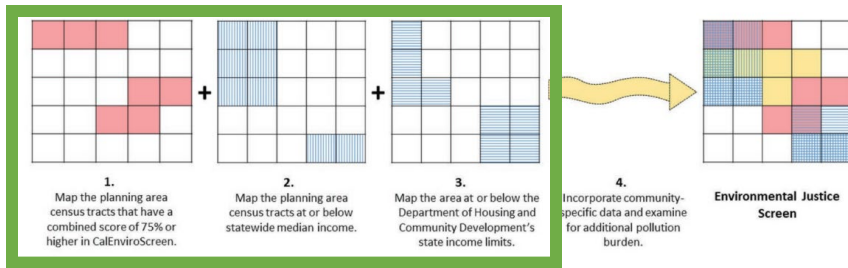
Census Tract	Median Income <sup>1</sup> (HH Size)	Pollution Burden Score
202.14	\$26,735 (3)	61
201.08	\$60,242 (4)	50
202.02	\$38,920 (3)	59
202.07	\$46,762 (3)	58
202.11	\$52,422 (3)	55
206.01	\$54,063 (3)	54
206.02	\$56,978 (3)	58
207.07	\$49,764 (3)	52
205	\$67,188 (3)	65

HH: Household  
<sup>1</sup>Median Incomes sources from 2020 ACS 5-Year Estimates

**Figure 7 – Step 3 Results**



### B.1.4 Steps 1 through 3, Combined



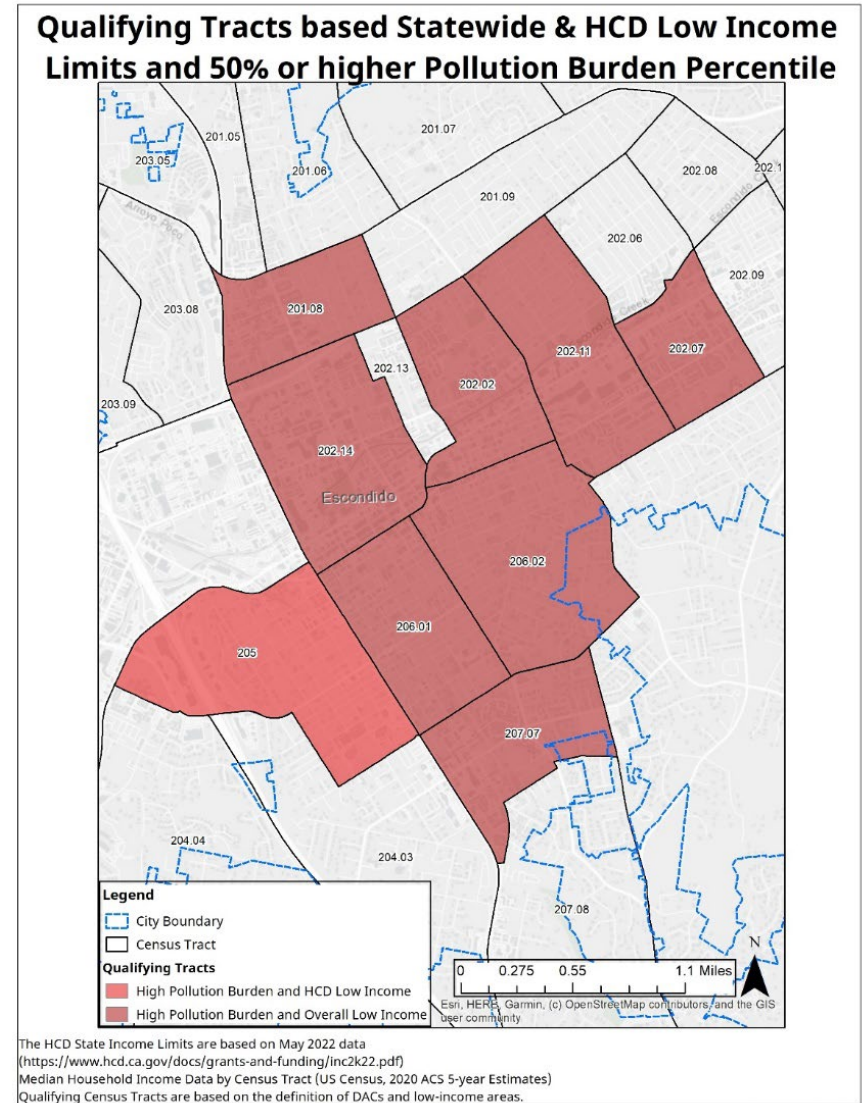
The initial base analysis comprised of Steps 1 through 3 identifies 9 preliminary qualifying Environmental Justice Communities, as shown in Figure 9 and listed in Table 4. For reference, there are 38 census tracts within the City's General Plan Area.

Tract No.	Pollution Burden Score	Median Income <sup>1</sup> (HH Size)	Threshold Statewide/HCD
<b>202.14</b>	61	\$26,735 (3)	\$62,938/\$93,700
<b>201.08</b>	50	\$60,242 (4)	\$62,938/\$104,100
<b>202.02</b>	59	\$38,920 (3)	\$62,938/\$93,700
<b>202.07</b>	58	\$46,762 (3)	\$62,938/\$93,700
<b>202.11</b>	55	\$52,422 (3)	\$62,938/\$93,700
<b>206.01</b>	54	\$54,063 (3)	\$62,938/\$93,700
<b>206.02</b>	58	\$56,978 (3)	\$62,938/\$93,700
<b>207.07</b>	52	\$49,764 (3)	\$62,938/\$93,700
<b>205</b>	65	\$67,188 (3)	\$62,938/\$93,700

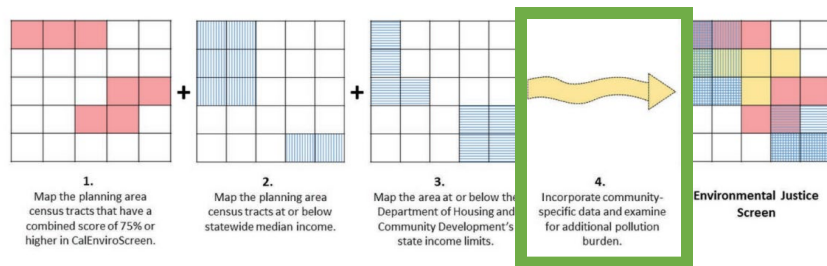
HH: Household, HCD: CA Dept of Housing and Community Development  
<sup>1</sup>Median Incomes sources from 2020 ACS 5-Year Estimates

It is worth noting that tract 202.13's pollution burden score is 49, a point below the 50-point threshold used for qualifying as a PIN under the E-CAP. However, it does meet both low-income thresholds, as shown in Figures 6 and 8. As shown in Figure 9, it is also fully surrounded by qualifying tracts.

**Figure 8 – Combined Results**



### B.1.5 Step 4: Incorporate community-specific data and examine for additional pollution burden



The City conducted an initial phase of outreach and engagement throughout 2022 to ascertain priorities regarding EJ topics outlined in Government Code § 65302(h), as well as to capture any other related concerns or issues identified by the community. Details on the outreach and engagement process can be found in the [draft community outreach and engagement plan](#). Through this outreach and engagement process, Escondido community members identified safe and sanitary housing, food access, and reduction in pollution burden as the top 3 EJ-related concerns. With these priority issues identified, staff conducted community specific analyses to determine if the preliminary tracts identified appear to have additional burdens based on the community's identified concerns.

The community mapping analysis utilized local and regional data sourced from the City, and the San Diego Regional Association of Government's ("SANDAG") GIS repository, known as SANGIS. Spatial analysis was conducted to assess the land uses shown in Table 5 and determine whether higher concentrations exist within the final draft EJC tracts (shown in Figure 9) compared to areas outside of the final draft EJC tracts.

### B.1.6 Results: Environmental Justice Communities

#### *CENSUS TRACT 202.13*

With Steps 1 through 4 taken into consideration, census tract 202.13 is a noticeable island surrounded wholly by qualifying tracts. Environmental justice issues are not defined by rigid boundaries and are not contained neatly within census tract borders. It is reasonable that if surrounding areas qualified as EJs, there is a possibility that tract 202.13 may be experiencing similar issues. Based on its overall pollution burden score of 49, qualification as lower income in each income assessment, and geographic proximity, as well as its designation by the State as a R/ECAP, tract 202.13 is included as an EJC.

#### *FINAL ENVIRONMENTAL JUSTICE COMMUNITIES*

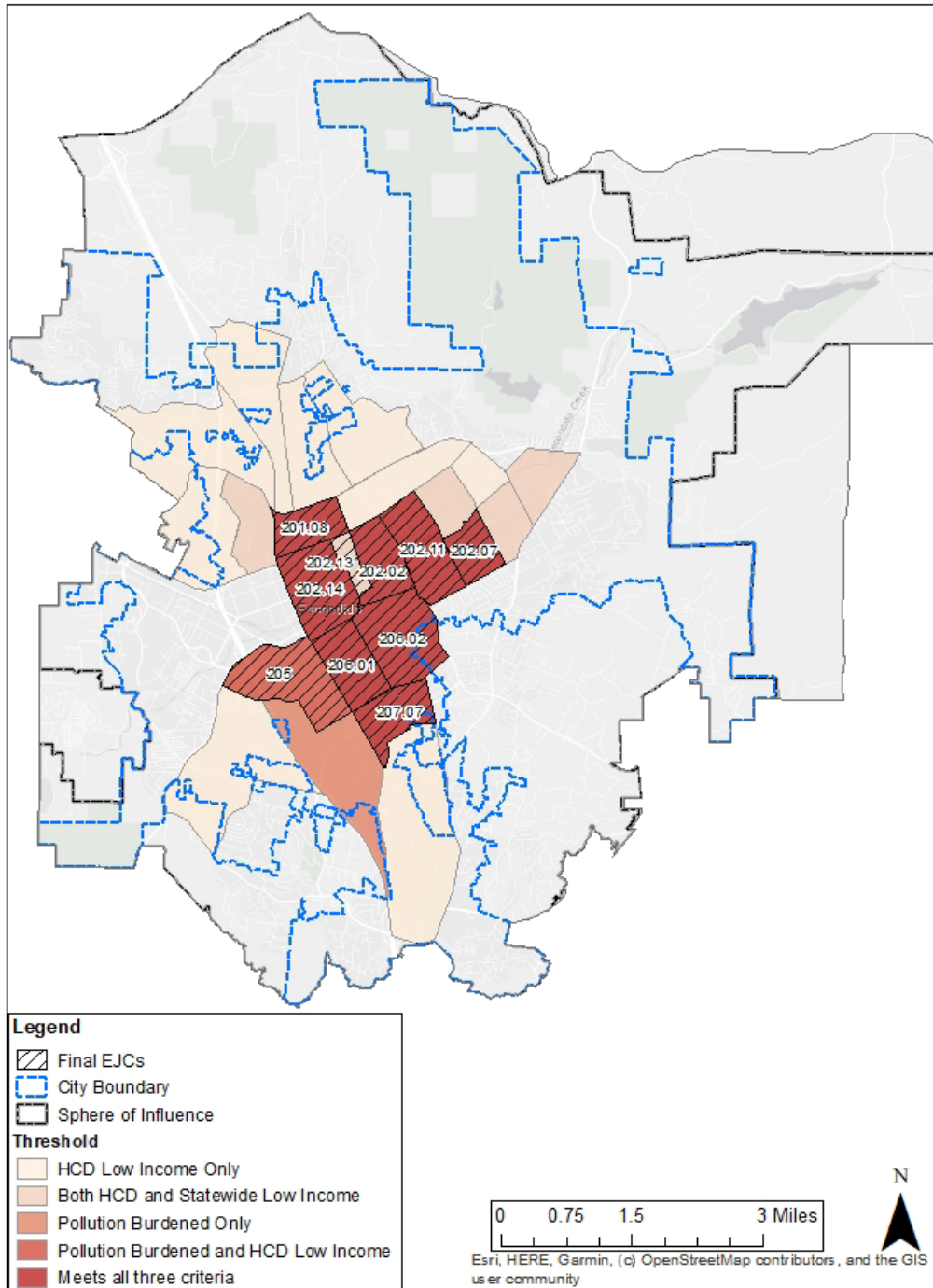
The final Environmental Justice Communities within the City for the purposes of compliance with Government Code section 65302(h) are shown in Figure 10.

There are several tracts that qualified under at least one category. As mentioned earlier, environmental justice issues are apt to change over time. Therefore, these tracts should be reassessed periodically to identify potential new EJs, and to aid in determining whether City EJ policies improve EJ conditions within the identified EJs.



Figure 10

## Final Draft Environmental Justice Communities



The HCD State Income Limits are based on May 2022 data (<https://www.hcd.ca.gov/docs/grants-and-funding/inc2k22.pdf>)  
Median Household Income Data by Census Tract (US Census, 2020 ACS 5-year Estimates)  
Final EJCs based on Gov. Code sec. 65302(h).

06152023\_FinalEJCs\_DraftMap

# C.Environmental Justice Goals, Policies, & Actions

## C.1 EJ Policy Methods

To better understand what types of goals, policies, and actions best reflect the Escondido community, City staff used the following three methods for creating the draft EJ language:

### C.1.1 Community Outreach

The City of Escondido created a draft outreach and engagement plan to outline the goals and objectives of the outreach process. The draft plan serves as a living document to be updated throughout the EJ element process. While a myriad of outreach and engagement methods are outlined within the plan, the City conducted the following 3 throughout the 2022 calendar year.

- I. Stakeholder Roundtable Discussions
- II. Public Workshops
- III. Event Activities

Throughout the initial outreach and engagement process, City staff interacted and received feedback from a number of community participants. These ranged from representatives from nonprofits, community-based organizations, tribal governments, and other public agencies, as well as community members such as residents, school aged youth, and people who work or play in Escondido.

City staff coded all written responses from the community received at all of the outreach activities. The data mandatory EJ categories were used for coding purposes, in addition to a miscellaneous category for those that did not fit within the predefined EJ categories. Overall, staff found that the

primary areas of interest from the community are safe and sanitary housing, food access, and reducing pollution burdens.

### C.1.2 Document Review

Document review is a form of qualitative research that entails collecting data through review of existing documents. The City reviewed 4 adopted EJ elements from different jurisdictions to assess their level of detail and scope of their EJ goals, policies, and actions. City staff selected the 4 cities based on Census demographic data and/or location. The chosen cities include:

- I. El Cajon (San Diego County)
- II. National City (San Diego County)
- III. Placentia (Orange County)
- IV. Perris (Riverside County)

Escondido is larger in terms of population; however, all 5 cities have similar demographic data regarding age, foreign born population, household computer access, persons with disabilities, labor forces, and travel time to work<sup>1</sup>. It is also worth noting that National City is one of the first jurisdictions in the State to adopt an EJ element (2011) which is another factor in its choice for comparison.

City staff pulled policy language from all 4 jurisdictions' EJ elements based on the following criteria:

- Relevancy to Outreach and Engagement results.
- The adopted language included one of the following criteria:
  - Time metric
  - Identified responsible entity for implementation
  - Identified a specific program or project
  - Identified a specific action for implementation

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<sup>1</sup> US Census Bureau, QuickFacts, 2017-2021 American Community Survey (ACS) 5-Year Estimates ([Comparative data can be located by clicking this link.](#))

All the policy language across the 4 documents shows a trend to provide more detailed information in policies that relate to civic engagement (37 policies), safe and sanitary housing topics (26 policies), and pollution reduction (21 policies). Public facilities, miscellaneous topics (i.e., those that would not fall in just 1 of the 6 identified EJ categories), and food access ranked second (14, 10, and 7, respectively). The most noticeably low number of relevant policies that fit the above criteria are those relating to physical activity (5 policies). Based on review of all policies within each of the 4 identified cities, fewer physical activity policies were identified likely due to overlap with active transportation and mobility related policies, which active transportation plans, mobility elements, park master plans, and a various other policy documents traditionally cover. Based on this, the lower number of physical activity policies are likely due to their presence in other city policy documents.

### C.1.3 GIS Mapping—Spatial Analysis of Land Uses

Table 5 provides comparative information on select land uses (Column A) located within, and outside of, the preliminary environmental justice communities' ("EJCs") boundaries. Column A also denotes the applicable EJ-related category for each land use. Columns B and C show the number of the select land uses located within, and outside of, the identified EJCs. Column D shows what percentage of the select land use is located in EJCs.

**Example, Liquor Stores:** *There are 36 liquor stores permitted within the City. Of the 36 liquor stores, 19 (or 53%) are located within EJCs. Therefore, 53% of all liquor stores are located within 9 of the City's 38 census tracts.*

Columns E, F, and G are intended for comparative purposes. Column E shows the total number of residential units within one-half mile of the land use<sup>2</sup>, regardless of where the residential units are located within the City. Column F provides the total number of units within one-half mile and are located within an EJC, while Column G shows the total number of units within the same distance but located outside of an EJC.

<sup>2</sup> One-half mile is used for all land uses except for gas stations and waste facilities.

**Example, Liquor Stores:** *There are 23,056 residential units located within ½ mile of a liquor store. Of those 23,056 units, 12,189 are located in an EJC and 10,867 are located outside of an EJC.*

Finally, Columns H and I illustrate the percentage of residential units within one-half mile as it relates to the total number of units inside or outside the preliminary EJC boundaries (Figure 9). Column H takes the total number of residential units located within one-half mile of the land use and in an EJC, and then compares that value to the total number of residential units within the EJCs. The resulting percentage shows the proportion of total units in EJCs in proximity to each individual land use. Column I provides this same calculation for residential units located outside of the EJCs.

**Example, Liquor Stores:** *The 12,189 residential units located within an EJC and within ½ mile of a liquor store account for 77% of all residential units located within the EJCs. This is in comparison to the 10,867 residential units located outside an EJC and within ½ mile of a liquor store, which account for only 26% of all units located within the City, excluding the EJC areas.*

Ideally, concentrations within the EJC tracts should be similar to those citywide; however, historic land use patterns, current land use best practices, along with scientific methods impress this is a faulty comparison. Historic land use patterns prioritized suburban sprawl and the automobile, with mass swaths of low-density residential and therefore lower concentrations of non-residential uses. Urban areas, however, historically bear the brunt of such non-residential uses because urban areas typically contained concentrated densities of residents, where consumer concentrations for such good were higher. Additionally, those with automobiles could travel to such urban locations for the uses while collectively keeping such uses away from the lower-density residential enclaves, facilitating the uses' urban city center locations. Today, land use best practices entail embracing density and urban concentrations while

reducing suburban sprawl through concepts such as smart growth and transit-oriented development, which encourage dense residential and nonresidential uses so as to reduce vehicle miles traveled, provide more access to multi-modes of transit, and reduce greenhouse gas emissions.

With certain land uses outlined in Table 5, we can assess ratios to denote the difference between the particular land use and the location of inside or outside an EJC.

**Example, Park Acres:** *There are approximately 27.2 park acres for 15,868 residential units within the EJCs. This is an average of .0017 park acres per residential unit. However,*

*there are approximately 1,364.2 park acres for 41,842 residential units located outside of the EJCs. This is an average of .0332 park acres per residential unit, which is almost 20 times more park acres per residential unit for areas outside of the EJCs than within the EJCs.*

**Limitations** Statistical methods were not utilized in this analysis—only qualitative methods (excluding spatial analysis) were used. Therefore, correlation and causation cannot be determined. By identifying such concentrations relative to geographic relation, City policy can work to remedy such concentrations.

**Table 5 - Community Mapping Results**

	A	B	C	D	E	F	G	H	I
1	Land Use <sup>1</sup> (Related EJ Topic)	Total # citywide	# Located in EJC's	% of land uses located within EJC's	# of residential units within walking distance <sup>2</sup>	# of residential units within walking distance & located in EJC <sup>2</sup>	# of residential units within walking distance & located outside EJC <sup>2</sup>	Total % of EJC residential units within walking distance <sup>2</sup>	Total % of non-EJC residential units within walking distance <sup>2</sup>
2	Residential Units (Safe & Sanitary Housing)	57,710	15,868	27%					
3	<b>Example: Liquor Stores</b>	<ul style="list-style-type: none"> <li>There are 36 permitted liquor stores within the City. In the EJC census tracts, there are 19.</li> <li>53% of liquor stores are located within an EJC.</li> </ul>			<u>23,056</u> residential units are located within walking distance of a <u>liquor store</u> .	Of the 23,056 residential units with walking distance of a liquor store, <u>12,189</u> are located within an EJC.	Of the 23,056 residential units within walking distance of a liquor store, <u>10,867</u> are located outside an EJC.	<u>77%</u> of all EJC residential units are within walking distance of a <u>liquor store</u> .	<u>26%</u> of residential units located outside an EJC are within walking distance of a <u>liquor store</u> .
4	Liquor Stores (Food Access)	36	19	53%	23,056	12,189	10,867	77%	26%
5	Healthcare Facilities (N/A)	30	22	73%	20,080	12,705	7,375	80%	18%
6	Transit (Public Facilities)								
7	Routes	20	18	90%	-	-	-	-	-
8	Stops	299	93	31%	46,184 <sup>5</sup>	15,125	31,059	95%	74%
9	Bike Lanes (mi) (Public Facilities)	91.4 mi	11 mi	12%	50,553	15,759	34,794	99%	83%
10	Farmers Markets/Stands (Food Access)	6	1	17%	3,962	2,109	1,853	13%	4%
11	Grocery Stores (Food Access)	50	28	56%	28,298	13,132	15,166	83%	36%
13	Convenience Stores - no fueling (Food Access)	25	12	48%	24,411	12,576	11,835	79%	28%
14	Parks <sup>3</sup> (Public Facilities) (Physical Activity)								
	# of Parks	20	5	25%	25,535	10,471	15,064	66%	36%
15	Park Acres	1,392	27	2%	-	-	-	-	-
16	Waste Facilities (Pollution Burden)	7	0	0	35 <sup>6</sup>	0	35	0	<1%
17	Gas Stations (Pollution Burden)	48	25	52%	968 <sup>6</sup>	600 <sup>6</sup>	368	4%	1%
18	Smoke Shops (Pollution Burden)	16	8	50%	21,414	11,191	10,223	71%	24%

<sup>1</sup> Land use data sourced from SANDAG's SANGIS repository or provided by City of Escondido

<sup>2</sup> "Walking distance" equals ½ mile for all uses except for waste facilities and gas stations. For waste facilities and gas stations "walking distance" is 500-feet for the purposes of potential air quality impacts.

<sup>3</sup> Excludes Daley Ranch and any proposed park areas

EJC – Environmental Justice Communities



Attachment 2: Example Environmental Justice Policy Language

<b><i>EJ Topic</i></b>	<b>El Cajon</b>	<b>National City</b>	<b>Placentia</b>	<b>Perris</b>
<b><i>Food Access</i></b>	Support the promotion of healthy food and food assistance programs.	Require new development to provide and maintain fresh drinking water fountains, where feasible and appropriate.	Encourage existing retailers to improve the quality and selection of healthy foods and nutritional information through incentives, technical assistance, and other services. Adopt a Healthy Food Store Incentive program, to encourage stores to stock fresh and healthy food at affordable prices.	Universal access to healthy food for food insecure populations.
<b><i>Pollution Reduction</i></b>	Prioritize tree planting in the EJs, to reduce residents' vulnerability to extreme heat. Focus efforts on shade trees along sidewalks, at transit stops, schools, bike lanes and within parks in the EJs.	Avoid siting new sensitive land uses within 500 feet from the centerline of a freeway, unless such development contributes to smart growth, open space, or transit-oriented goals, in which case the development shall include feasible measures such as separation/setbacks, landscaping, barriers, ventilation systems, air filters/cleaners, and/or other effective measures to minimize potential impacts from air pollution.	Improve the quality of built and natural environments to support a thriving community and to reduce disparate health and environmental impacts, especially to low-income and disadvantaged communities.	A community that reduces the negative impacts of land use changes, environmental hazards and climate change on disadvantaged communities.
<b><i>Civic Engagement</i></b>	Specifically invite residents from EJs to become commission, committee, and task force members as openings occur.	Hold meetings and workshops at times and locations that are convenient for community members to attend, especially those that may be directly affected by a particular decision.	Create and improve city systems whereby improvements and programs are prioritized for disadvantaged communities.	Provide the opportunity for multilingual interpretation and translation at all public meetings, including at least Spanish and additional languages, should a need be identified.
<b><i>Physical Activity</i></b>	Explore the expansion of facilities and amenities in existing parks, as well as an increase in the amount of parks, trails, open spaces and green spaces as they are important tools for increasing levels of physical activity and reducing the incidence of chronic illness.	Improve access to bicycles, helmets, and related equipment for lower income families.	Update Zoning Code to eliminate any barriers to facilitating the goal of creating complete neighborhoods with access to retail and recreation resources within walking distance of homes.	Implement the prioritization framework provided in the City's Active Transportation Plan to evaluate all proposed bicycle and pedestrian projects.

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 Attachment 2

<p><b>Public Facilities</b></p>	<p>Increase positive activity and neighborhood surveillance in parks to deter drinking and drug use in the parks and public open spaces.</p>	<p>Update the capital improvement program for the improvement of existing public facilities and the development of new facilities and plan for the equitable distribution of infrastructure improvements and public facilities and services considering both number/size and access/distance to facilities.</p>	<p>Provide a wider diversity of active and passive recreational facilities in all parks that respond to the needs of multicultural and DAC communities.</p>	<p>Quality community infrastructure and facilities that meet the needs of disadvantaged communities.</p>
<p><b>Safe &amp; Sanitary Housing</b></p>	<p>Promote improvements and rehabilitation of unsafe housing in EJC's, while actively preventing displacement.</p>	<p>Prioritize lead education and remediation programs to benefit low-income families.</p>	<p>Create and actively enforce a City Lead Paint Program.</p>	<p>Neighborhoods that enhance the safety and welfare of people of all ages, income levels, and cultural backgrounds.</p>