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## **GENERAL PLAN GUIDELINES**

### **CHAPTER 4: Required Section**

#### **Environmental Justice Element Introduction**

Over 9 million Californians are exposed to and at risk from high levels of pollution, according to the Office of Environmental Health Hazard Assessment's CalEnviroScreen data mapping tool.<sup>vii</sup> [Senate Bill 1000 \(2016\)](#), requires both cities and counties that have disadvantaged communities to incorporate environmental justice (EJ) policies into their general plans, either in a separate EJ element or by integrating related goals, policies, and objectives throughout the other elements upon the adoption or next revision of two or more elements concurrently.

#### **SB 1000 - Government Code Section 65302(h)**

(1) An environmental justice element, or related goals, policies, and objectives integrated in other elements, that identifies disadvantaged communities within the area covered by the general plan of the city, county, or city and county, if the city, county, or city and county has a disadvantaged community. The environmental justice element, or related environmental justice goals, policies, and objectives integrated in other elements, shall do all of the following:

(A) Identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by means that include, but are not limited to, the reduction of pollution exposure, including the improvement of air quality, and the promotion of public facilities, food access, safe and sanitary homes, and physical activity.

(B) Identify objectives and policies to promote civil engagement in the public decision-making process.

(C) Identify objectives and policies that prioritize improvements and programs that address the needs of disadvantaged communities.

(2) A city, county, or city and county subject to this subdivision shall adopt or review the environmental justice element, or the environmental justice goals, policies, and objectives in other elements, upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018.

(3) By adding this subdivision, the Legislature does not intend to require a city, county, or city and county to take any action prohibited by the United States Constitution or the California Constitution.

(4) For purposes of this subdivision, the following terms shall apply:  
(A) “Disadvantaged communities” means 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.  
(B) “Public facilities” includes public improvements, public services, and community amenities, as defined in subdivision (d) of Section 66000.  
(C) “Low-income area” means 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 50093.

Equity and EJ may mean different things in different communities. EJ is defined in [section 65040.12\(e\)](#) of California Government Code as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” Equity can serve as a larger framework and is closely related to EJ. See the [Equitable and Resilient Community Chapter](#) for an expanded discussion. Similarly, local governments may address those issues in different ways in their general plans. A stand-alone EJ element may make it easier for the public and decision-makers to see EJ policies in one place. Alternately, an integrated approach puts EJ policies into the elements that address them; for example, including siting of industries in the [land use element](#) could make implementation more actionable. Statute requires policies to be integrated and some jurisdictions may choose to pursue a hybrid approach that does both. Regardless of approach, the EJ policies must meet internal consistency rule set forth in [Government Code section 65300.5](#).

Planning for environmental justice allows jurisdictions to address things like:

- Air pollution
- Pesticide exposure
- Contaminated water or land
- Traffic density
- Toxic release from facilities

Ultimately, the best format will depend on the local context, community interest, and practicality of updating future general plans, and should complement the current update and vision. Whether incorporated into a separate element, addressed throughout the document or done as a hybrid combining both approaches, explicitly considering siting compatibility, [community engagement](#), location of polluting facilities, and access to important amenities are all ways to move towards more equitable and healthy communities. Although only communities with disadvantaged communities are required to comply with Government Code section 65302(h), it is good planning practice for all jurisdictions to consider integrating these

types of policies and a more holistic planning approach to protect human health from environmental hazards.

### **Jurupa Valley**

Jurupa Valley adopted a separate Environmental Justice Element in November 2014. A city with almost 100,000 community members and a history of high pollution burden, they created an element to address:

- Community Engagement
- Mobility and Active Living
- Air Pollution and Other Environmental Hazards
- Healthy and Affordable Housing

Since 2003, the General Plan Guidelines have provided guidance on incorporation of EJ considerations for local jurisdictions pursuant to Government Code section 65040.12(c)-(d), including:

1. Methods for equitable distribution of new public facilities and services;
2. Methods to consider siting of polluting facilities that seek to minimize over concentration of health and safety hazards;
3. Methods for siting new schools and residential dwellings to avoid proximity to industrial areas; and
4. Methods for promoting livable communities to maximize transit-oriented development so residents minimize traffic and air pollution impacts. That guidance is updated in this chapter as well as other relevant portions of the General Plan Guidelines.

### **AB 1553 - Government Code Section 65040.12(d)**

(1) Propose methods for planning for the equitable distribution of new public facilities and services that increase and enhance community quality of life throughout the community, given the fiscal and legal constraints that restrict the siting of these facilities.

(2) Propose methods for providing for the location, if any, of industrial facilities and uses that, even with the best available technology, will contain or produce material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant hazard to human health and safety, in a manner that seeks to avoid over-concentrating these uses in proximity to schools or residential dwellings.

(3) Propose methods for providing for the location of new schools and residential dwellings in a manner that seeks to avoid locating these uses in proximity to industrial facilities and uses that will contain or produce material that because of its quantity, concentration, or physical or chemical characteristics, poses a significant hazard to human health and safety.

(4) Propose methods for promoting more livable communities by expanding opportunities for transit-oriented development so that residents minimize traffic

and pollution impacts from traveling for purposes of work, shopping, schools, and recreation.

This General Plan guidance includes information and recommendations as required by Government Code section 65040.12(d) as well as guidance to implement Government Code section 65302 and additional planning recommendations beyond statutory requirements that incorporate good planning practice. Government Code section 65302 includes several specific requirements, which should be viewed as a starting point, and by no means exhaustive. Additional considerations touching upon EJ and equity are set forth in the Community Engagement and Outreach, [Healthy Communities](#), and [Equitable and Resilient Communities](#) Chapters.

The EJ goals, policies, and objectives should reflect each required statutory element. For instance, reduction of pollution exposure will be directly linked to [circulation](#) and [land use](#) policies. [Conservation](#) and [open space](#) policies are important components for promoting physical activity. Policies in the [safety](#) element need to address protection of disadvantaged communities, including the impact of increasing hazards, such as extreme heat, flooding, and drought.

#### **Health and Safety Code § 39711.**

(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.

(b) The California Environmental Protection Agency shall hold at least one public workshop prior to the identification of disadvantaged communities pursuant to this section.

(c) Chapter 3.5 (commencing with Section 11340) of the Part 1 of Division 3 of Title 2 of the Government Code does not apply to the identification of disadvantaged communities pursuant to this section.

#### **Analysis: Does this apply to my jurisdiction?**

The first step a jurisdiction should take when they are getting ready to update their general plan is determine if they are required to meet Government Code section 65302 statutory requirements.

Requirement 1:

The jurisdiction will be adopting or revising two or more elements on or after January 1, 2018. (Gov. Code § 65302(h)(2)).

Requirement 2:

“[I]f the city, county, or city and county has a disadvantaged community” within its planning area. (Gov. Code § 65302(h)(1)).<sup>2</sup>

“Disadvantaged community” is specifically defined by Government Code section 65302:<sup>1</sup>

“**Disadvantaged communities** means 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.” (Gov. Code § 65302(h)(4)(A)).

The statute further defines “low-income area” to mean “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 50093](#)” (Gov. Code § 65302(h)(4)(C)).

*Based on the statutory language, there are essentially three potential definitions for a disadvantaged community. Jurisdictions have discretion to choose which definition to apply. For example, a jurisdiction could use CalEnviroScreen to determine if their planning area is required to incorporate Government Code section 65302 requirements. However, data tools such as CalEnviroScreen do not always reflect existing local conditions fully. Local jurisdictions should consider doing a more thorough analysis of their planning area using all three definitions and then verifying the findings with local or regional agency and community input to ensure that any disadvantaged communities are captured prior to beginning their planning process.*

OPR recommends that the disadvantaged community screen include<sup>2</sup>:

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<sup>1</sup> SB 1000 and SB 244 define a disadvantaged community differently. For jurisdictions with fringe or island communities, also see the [OPR guidance on SB 244](#). The Government Code uses a slightly different definition to identify “disadvantaged unincorporated communities” that must be addressed in the general plan pursuant to section 65302.10.

<sup>2</sup> The California Air Resources Board (CARB) has created a map of low-income communities by statewide median income and HCD State Income Limits. The state limits change annually. If using the map created by CARB, check to ensure the data is the most up to date. Available at: <https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/communityinvestments.htm>

1. Cal EnviroScreen – Examine if any of the general plan catchment planning area falls in the top 25%.<sup>3</sup>
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 state income limits and examine for disproportionate pollution burden.

It is important to note that data layers can change. It is important to verify and document the year when commencing the determination process. To make this determination, local governments must evaluate whether low-income areas are disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure or environmental degradation. The statute does not include a definition or process for determination of disproportionate pollution burden or other hazards. However, it is important that local jurisdictions broadly analyze possible disproportionate burdens to further the protective intent of Government Code section 65302. One approach is for the local jurisdiction to use the data layers available in CalEnviroScreen that approximate pollution burden and overlay that data with the two low-income area definitions. The CalEnviroScreen tool has a link to individual layers.

Included data layers are currently:

- Ozone concentrations
- PM2.5 concentrations
- Diesel PM emissions
- Pesticide use
- Drinking water contaminants
- Toxic releases from facilities
- Traffic density
- Clean up sites
- Groundwater threats
- Hazardous waste
- Impaired water bodies
- Solid waste sites and facilities

These individual layers can inform the local agencies’ determination of disproportionate pollution burden even when the census tract or area does not meet the definition of “disadvantaged community” under Health and Safety Code section 39711. For example, a low-income area may be considered disproportionately burdened if it has a high pollution burden for one type of pollutant, even when the overall CalEnviroScreen score is less than 75 percent.

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<sup>3</sup> The current percentile threshold, designated by CalEPA is the top 25%. For more information on how the designation is determined, visit: <https://oehha.ca.gov/calenviroscreen/sb535>

Local jurisdictions should also contact other local agencies, such as Local Agency Formation Commissions, Departments of Public Health, Water Districts, and Air Districts, to determine whether additional, localized data is available that could inform its evaluation of potential disproportionate burdens that may have been missed in larger statewide data sets. Often, local agencies have more granular data concerning air or water quality, data on environmental issues not tracked on a statewide basis (for example, illegal dumping), or more specific local planning data (such as data that may be available through metropolitan planning organizations).

California communities vary significantly by type, location, and size, which will impact the type and nature of environmental issues they face. Local jurisdictions should consider issues unique to their communities, which might not be reflected in the statewide data sets. Government Code section 65302 does not define the geographic extent of a “low-income area.” Depending on the data and information available to the local government, local governments should consider whether there are disadvantaged communities in geographic units that are smaller than a census tract to ensure that all disadvantaged communities are recognized. Additionally, jurisdictions should consider mapping specific climate vulnerability indicators as they conduct their initial screen. It should be noted that data sets at the level of a census tract may inadvertently add in land areas not under local control. These areas, such as federal land where local planning agencies do not have jurisdictions, can be filtered out. However, in filtering these areas out, is important to ensure the land itself does not contribute to pollution.

After determining whether disadvantaged communities exist in its jurisdiction, OPR recommends early community engagement to help ensure that the local government has accurately identified disadvantaged communities. One method for getting this input would be through a citizen advisory committee or working group that includes representatives from disadvantaged communities with knowledge of local and regional environmental challenges. [See Community Engagement Chapter](#). While the EJ statute does not specifically require consultation with tribal governments, there are specific requirements for general plans.<sup>4</sup>

Understandably, some communities may not like the designation as a “disadvantaged community,” even though that determination is part of the statutory requirement. Local jurisdictions may choose to use different nomenclature, as long as the communities identified by statute are included.

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<sup>4</sup> When consulting tribes, refer to Section V of the 2005 [Tribal Consultation Guidelines](#), Supplement to the GPG. (this refers to SB18 consultation requirement passed in 2004. AB52 consultation requirements are for CEQA – passed in 2016).

Government Code section 65302 requires local governments to screen for any disadvantaged communities that exist in the planning area to determine whether the rest of Government Code § 65302 requirements apply. If a disadvantaged community is identified, government code section 65302 requires that the EJ element identify the disadvantaged community or communities in the planning area. (Gov. Code section 65302(h)(1).) Suggestions for how to meet this requirement are described below.

### Existing Policy and Program Analysis

Although Government Code section 65302 is a new statutory requirement, many jurisdictions have already incorporated EJ goals, policies, and objectives into their current general plan through healthy community, social equity, or EJ frameworks. Before starting a revision, it is good practice to determine which policies and programs already exist in the current general plan.

Jurisdictions should conduct an analysis of policies and programs related to:

- Pollution exposure and air quality
- Public facilities
- Food access
- Safe and sanitary homes
- Physical activity
- Civil or community engagement
- Language that prioritizes improvements for disadvantaged communities

It may also be helpful to review a series of questions to inform the planning and outreach to update the policies and/or create new ones.

#### *Potential review questions:*

- Has this policy/program been effective? Are there metrics for tracking the previous policy? Would policies benefit from creating such measures? Has it been effective in managing pollution exposure risks, and/or facilitating well-rounded services to particular communities? Has it facilitated the development of parks and green space; food markets; safe active transportation routes, etc.?
- If it needs improvement, what are areas to improve?
- Are the agencies responsible for implementation specified in the policy/program?
- Are there ways the existing policy/program can be strengthened to integrate themes of health, resilience, equity, and EJ?
- What partner agencies are working on this policy/program?
- What new legislation exists since this policy was created? Are there new mandates that help further the reach? For example [SB1383](#) and food recovery efforts that help with food access or [SB2](#) to for housing related policies.

### Program and Partner Analysis



Government Code section 65302 requirements touch on some topics that are not traditionally covered in planning, including issues of food access and physical activity. As a result, Government Code section 65302 will require outreach to a different set of potential partners as part of community engagement, and implementation. Some of these issues will involve local agencies and departments as well as local non-profits that may have specific expertise but which have not historically been involved in the general plan process. Both local non-profits and their stakeholders may be assets as part of community engagement.

**Completeness Checklist**

Statutory Citation	Brief Description of Requirement
Gov. Code § 65302(h)(1)	Identify disadvantaged areas within the area covered by the general plan
Gov. Code § 65302(h)(1)(A)	Identify objectives and policies to reduce exposure to pollution including improving air quality in disadvantaged communities
Gov. Code § 65302(h)(1)(A)	Identify objectives and policies to promote public facilities in disadvantaged communities
Gov. Code § 65302(h)(1)(A)	Identify objectives and policies to promote food access in disadvantaged communities
Gov. Code § 65302(h)(1)(A)	Identify objectives and policies to promote safe and sanitary homes in disadvantaged communities
Gov. Code § 65302(h)(1)(A)	Identify objectives and policies to promote physical activity in disadvantaged communities
Gov. Code § 65302(h)(1)(A)	Identify objectives and policies to reduce any unique or compounded health risks in disadvantaged communities not otherwise addressed above
Gov. Code § 65302(h)(1)(B)	Identify objectives and policies to promote civil engagement in the public decision making process in disadvantaged communities
Gov. Code § 65302(h)(1)(C)	Identify objectives and policies that prioritize improvements and programs that address the needs of disadvantaged communities

**Required Contents**

Government Code section 65302(h) describes the required content to incorporate EJ into a general plan. Specifically, the general plan must:

- Identify disadvantaged communities located within the area covered by the general plan
- Identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by means that include but are not limited to:
  - » Reducing pollution exposure, including improving [air quality](#)

- » Promoting public facilities
  - » Promoting food access
  - » Promoting safe and sanitary homes
  - » Promoting physical activity
  - Identify objectives and policies to promote civil engagement in the public decision making process
  - Identify objectives and policies that prioritize improvements and programs that address the needs of disadvantaged communities
- Each of these required components is described in more detail below.

#### **California Communities Environmental Health Screening Tool: CalEnviroScreen 3.0**

This data tool developed by the Office of Environmental Health Hazard Assessment (OEHHA) on behalf of the California Environmental Protection Agency (CalEPA) provides statewide data to help identify communities disproportionately impacted by pollution. Updates and additional information on EJ issues and pollution sources can be found at: <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>

### Description of Statutory Requirements

#### **Identify Disadvantaged Communities**

To meet the requirement that the local government “identify disadvantaged communities within the area covered by the general plan,” it must state in its general plan update whether and where disadvantaged communities are located in the jurisdiction. The document should explain the local government’s methodology for identifying them, describe the communities’ location and the disproportionate pollution burdens, health risks, and needs experienced by the community, as identified by the local government, and include a map and if appropriate a list of the disadvantaged communities. This will ensure that the public has notice and an opportunity to provide input on the identification of disadvantaged communities in the planning area. More information on methods available to local governments to identify the disadvantaged communities in their planning area is provided above in the section outlining how a local government can determine whether government code section 65302 applies.

#### **Reduction of Pollution**

##### **Requirement Description:**

The general plan must identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by reducing pollution exposure, including the improvement of air quality.

#### **General Environmental Health Considerations**

Exposures to various toxic substances in air, water, and soil can significantly affect health. **Noise**, when extreme, can also be considered a health hazard. Diseases such as asthma, birth defects, cancer, heart disease, neurologic disorders, and reproductive

disorders can be linked to toxins in the environment. In addition, certain geographic areas and communities experience a disproportionate share of exposure to environmental toxins. As a result, the concentration and compatibility of siting pollution sources should be considered in the context of housing, childcare, schools, and businesses. Siting of childcare is particularly important because children are more susceptible to exposure to toxic substances due to their developmental stage. Childcare sites are often sited in residential or mixed-use zones. Siting in a residential use zone is generally safer, as it avoids proximity to incompatible uses. However, exposures are still possible in residential areas and site evaluation is important. Occasionally, childcare sites are in commercial, agricultural, or industrial zones. If this occurs, extra precautions may be needed to ensure there are not hazards. Although [school siting](#) is not controlled by the general plan, local planning agencies can provide information to school districts and other entities involved in locating services to avoid location near higher-risk areas, such as near businesses producing, emitting, or handling toxic substances, agricultural land where pesticides are used, or areas with poor air quality.

Planning. Guidance. Protection:  
Choose Safe Places for Early Care and Education Guidance Manual

In April 2017, the Agency for Toxic Substances and Disease Registry released a planning guide for many stakeholders, including land-use decision makers to improve siting of facilities for children. The guide contains information on:

- Background environmental justice issues in siting of child facilities
- Considerations for safe siting
- Case studies and models

[Air quality](#) is also a relevant consideration for public health. Air quality can be impacted by mobile or stationary sources. Of course, while air quality varies from day to day and can be affected by many environmental factors as well as emission sources, prevailing winds, and natural terrain, local governments can positively affect air quality through planning decisions. An effective way to address air quality through a general plan, for example, is [to set long range goals](#) to promote mode shift and improve accessibility for walkability and bikeability to local amenities. Improving infrastructure investments serve multiple benefits including mode shift, health benefits from increased mobility, and reduced greenhouse gas emissions (GHG). [Land use policies](#) that prioritize long-range planning to [promote infill development](#) and a suite of land use tools can improve air quality jurisdiction-wide and help local governments meet GHG reduction goals. In some cases, short-term planning needs to account for near-term exposure and various scientifically examined methods exist to mitigate risk. The new near roadway siting guidance by CARB

AB 617 will create new land use resources and tools for local jurisdictions including:

- Best practice examples
- An updated freight handbook
- Resources on health data for improved decision making

highlights some of these strategies. [See Air Quality](#). These mitigation strategies are important because they help communities avoid developing in a way that creates higher roadway demand and ultimately worsens air quality in the long term. Newer technologies such as zero emission vehicles, clean power, and filtration systems are also an important consideration as land use development is happening.

In addition to improving air quality through policies that promote long range planning to reduce vehicle use more broadly, local governments should consider localized air pollution resulting from a concentration of stationary sources of air pollution, such as manufacturing facilities or other industrial air pollution sources, and high volume roadways, such as highways and truck routes, in or near disadvantaged communities. Strategies for addressing concerns with overconcentration of air pollution sources are provided below. Additional air pollution mitigation measures could be provided in areas where air pollution is impacting disadvantaged communities, including, for example, indoor air filtration, truck routes that avoid residences, schools, and childcare centers, providing for electric vehicle infrastructure, and mitigation of dust throughout project construction and operation. [See Air Quality Chapter](#).

[AB 617 \(2017\)](#) is designed to reduce exposure in communities most impacted by air pollution. The California Air Resources Board (CARB) established the [Community Air Protection Program](#) to implement the elements of the legislation, which include statewide strategies and resources, community-specific emissions reductions programs, accelerated installation of pollution controls on industrial sources, expanded air quality monitoring within communities, increased penalties for violations of emissions control limits, and greater transparency and improved public access to air quality and emissions data through enhanced online web tools. At the local level, communities, air districts, and other stakeholders will work collaboratively with land use and transportation planning agencies to identify and implement strategies to reduce exposure to air pollution.

Just as good planning practices can improve air quality, holistic planning to increase access to clean drinking water is important for health. Environmental stewardship and water management is directly impacted by [land use](#) decisions. Again, exposures in rural and urban areas may vary based on local factors and local water agencies can serve as a resource. [See section on water](#).

#### **Los Angeles Clean Up Green Up**

Communities can address toxic hot spots in a variety of ways. Clean Up Green Up (CUGU) emerged in Southern California from grass root work where residents in Boyle Heights, Wilmington, and Pacoima/Sun Valley came together to address overconcentration and high exposure to pollution. Residents and community groups

worked to pass an ordinance to address environmental pollution, change zoning, and look for new opportunities.

The program focuses on addressing over concentration of certain polluting uses such as factories, oil operations, and warehouses. The ordinance states: “The purpose of the CUGU District is to reduce cumulative health impacts resulting from land uses including, but not limited to, concentrated industrial land use, on-road vehicle travel, and heavily freight-dominated transportation corridors, which are incompatible with the sensitive uses to which they are in close proximity, such as homes, schools and other sensitive uses.” The community is working to address the issue of compatibility and find wins for health and the environment.

<https://www.preventioninstitute.org/blog/las-promising-clean-green-ordinance>  
Ordinance available here: <https://planning.lacity.org>

### Compatibility

At the general plan level, discussions about EJ involve a central **land use** concept: compatibility. Incompatible land uses may create health, safety, and welfare issues for the community.

Traditional, rigid separation of land uses resulted in disconnected islands of activity and contributed to sprawl. Development patterns characterized by single use result in the automobile being the only viable transportation option, which results in high environmental, economic, health, and social costs. Encouraging mixed-use development, proximity to transit corridors, and access to employment, education, commercial centers, services, and recreation should be considered alongside specific uses that will always be incompatible with residential and school uses.

Residential and school uses are impacted by incompatible land uses that have environmental effects, such as noise, air emissions (including dust), and exposure to hazardous materials. The compatibility problem also operates in reverse. Incompatible uses adjacent to residential units, schools, or environmentally sensitive areas may also suffer negative consequences in the form of higher mitigation costs or the curtailment of economic activities. Specific examples of land use incompatibility include:

- Residential, childcare, and school uses in proximity to industrial facilities and other uses that, even with the best available technology, will contain or produce pollution that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant hazard to human health and safety.
- Residential, childcare, and school uses in proximity to intensive agricultural uses.
- Residential, childcare, and school uses in proximity to major thoroughfares, such as highways and truck routes, without appropriate mitigation ([see mitigation strategies in Air Quality Chapter](#)).
- Residential, childcare, and school uses in proximity to extraction activities, such as mining or oil and gas wells.

It is important to note that while school siting decisions are not controlled by the general plan, planners can work with local school districts to help inform long range planning considerations for schools.

### Industrial Facilities and Large Scale Agricultural Lands

While a variety of agencies regulate industrial facilities and other potential sources of pollution like agricultural lands, cities and counties, as the local land use authority, are primarily responsible for the location and distribution of potentially hazardous facilities and uses through their general plans and zoning ordinances.

Cities and counties may pursue several strategies within their general plans to address over-concentration which can occur when two or more facilities or uses, which do not individually exceed acceptable regulatory standards for public health and safety but pose a potential health hazard due to their cumulative effects, are located in the same area.

#### Strategies may include incorporating policies for the following areas:

- **Buffer zones between pollution sources and sensitive land uses.**  
Buffer zones are a broad approach to land use compatibility. The general plan land use diagram may designate transitional land uses between industrial and agricultural and residential areas and schools. Transitional uses may include open space, office uses, business parks, or heavy commercial uses. Appropriate distances for buffer areas will vary depending on local circumstances. Factors such as the prevailing winds, geographic features, and the types of facilities and uses allowed in industrial areas should be considered.

One weakness of general buffer zone policies is the difficulty of making a priori decisions about how much distance is needed to minimize potential health and safety hazards to residential and school uses. Therefore, buffer policies should provide for flexibility in their application to individual siting decisions.

- **Project siting decisions.**  
Approval of certain industrial facilities or uses can be made conditional if they are proposed within a certain distance of residential or school uses. This allows the city or county to consider the potential hazards associated with individual facilities or uses, together with potential mitigation, on a case-by-case basis. General plan policies can outline consistent standards to be used in approving, conditionally approving, or denying proposed locations for industrial facilities and other uses that may pose a hazard to the environment, human health, or public safety. Such standards should be reflected in

the zoning ordinance that implements the general plan (see [implementation chapter](#)).

- **Changing land use designations in over-concentrated industrial areas.**

One way to address existing or potential future problems of over-concentration is to change the land use designation for existing industrial areas. This approach differs from buffer zones in that buffer zones affect the land use designation of areas adjacent to existing or proposed industrial areas. Changing the allowable land uses in existing industrial areas prevents new industrial land uses from being established and may affect the expansion of existing facilities and uses (depending on how local policies treat pre-existing or “legal non-conforming” land uses). An important caveat is to consider what new uses will be allowed in the previously industrial areas. A new EJ problem could be created if residences and schools are allowed without considering any lingering effects of industrial over-concentration. At the same time, where over-concentration is no longer an issue and effective remediation or cleanup is possible, so-called “[brownfield](#)” development is an important tool for a community’s continued sustainable development.

#### **National City**

National City adopted a Health and Environmental Justice element prior to the new statutory requirement. The element has goals and policies on a range of EJ and Health issues such as:

- Environmental Justice
- Land Use
- Safety
- Open Space and Agriculture
- Education and Public Participation
- Respiratory Health and Air Quality
- Circulation
- Physical Activity
- Healthy Foods
- Access to Health Care
- Lead Based Paint and other contaminants

#### **New Residential Uses and Schools**

The EJ statute does not require school siting be addressed in the general plan. Local planners do not have jurisdiction over school siting decisions which are made by local school boards, however, planners are encouraged to work with their local schools to help provide information for the location of new schools and residential dwellings in

disadvantaged communities in a manner that avoids locating these uses in proximity to industrial facilities, agricultural lands, high-volume roadways and truck routes, and uses that will contain or produce materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant hazard to human health and safety.

The location of new residential and school development is a corollary of the problem discussed in the section above. Given the need for new housing and schools and given the need to make efficient use of land, how do cities and counties deal with existing over-concentration of industrial uses? When designating areas for residential development, the city or county should identify any areas of over-concentration. Appropriate buffers should be placed between over-concentrated industrial and agricultural areas and new residential areas. Using their authority over the approval and design of subdivisions, cities and counties may develop policies and standards related to industrial over-concentration and new residential subdivision approvals.

The location of new schools is of particular concern to both local governments and school districts. The general plan should identify possible locations for new schools. Such locations may be approximate and need not indicate specific parcels. Identifying appropriate school locations as part of the general plan process may avoid project-level problems of proximity to industrial facilities, agricultural lands, and high volume roadways. Due to the fragmentation of authority in the areas of [land use](#) planning and school siting and construction, it is recommended that the planning agency work closely with the school district to identify suitable school locations. Before adopting or amending a general plan, the planning agency must refer the proposed action to any school district within the area covered by the proposed action ([Gov. Code § 65352](#)).

School districts are required to notify the planning commission of the city or county before acquiring property for new schools or expansion of an existing school. School districts are not bound by local zoning ordinances unless the ordinance provides for the location of schools and the city or county has adopted a general plan ([Gov. Code § 53094](#)). School districts can override the general plan and zoning ordinances with regard to the use of property for classroom facilities by a two-thirds vote of the school board if they comply with certain statutory requirements (*Ibid.*). The school board cannot exercise this power for non-classroom facilities, such as administrative buildings, bus storage and maintenance yards, and warehouses. If the school board exercises its override power, it must notify the city or county within 10 days (*Ibid.*). At least 45 days prior to completion of a master plan or other plan relating to the expansion of existing school site or acquisition of new sites, the school district governing board shall notify and provide relevant information to the city/county planning commission and meet with the city/county if requested ([Gov. Code § 65352.2](#)).



**Legal Requirements: CEQA and School Siting**

CEQA requires that an environmental document shall not be certified or approved for a new school project unless 1) certain information is included in the environmental document, 2) the specified consultation requirement is met, and 3) the school district’s governing board makes certain written findings (Pub. Resources Code § 21151.8(a)). As to the environmental document prepared for a new school project, CEQA requires that it identify whether the proposed site is any of the following: a current or former hazardous waste or solid waste disposal facility, a hazardous substances release site identified by DTSC, the site of one or more pipelines that carries hazardous substances, or located within 500 feet of the edge of the closest lane of a freeway or other busy traffic corridor (Pub. Resources Code § 21151.8(a)(1)). The school district must also consult with the relevant public agencies to identify facilities within one-quarter of a mile of the proposed site that may emit hazardous air emissions or handle hazardous materials (Pub. Resources Code § 21151.8(a)(2)). Finally, if the proposed school site is within a quarter mile of a facility that may emit hazardous air emissions or handle hazardous materials, the school board must make findings that the facilities would not actually or potentially endanger the health of those attending or employed by the proposed school or that another public agency’s existing order requires corrective measures that will result in the mitigation of any actual or potential health endangerment (*Id.*). For sites within 500 feet of a busy traffic corridor, the school board must make certain findings, one of which may be a determination through modeling that neither short-term nor long-term air quality exposure poses significant health risks (*Id.*, § 21151.8(a)(3)(B)(iii)). If such findings cannot be made and no suitable alternative sites exist, the environmental document must include a statement of overriding considerations (*Id.*).

Intent of Analysis	Recommended Data
Asthma can be worsened by environmental triggers such as poor air quality, poor housing quality, and climate change, examining baseline conditions can help inform siting decisions.	Asthma (Prevalence, ED visits, hospitalizations)
Air quality has direct effects on people with respiratory disease. Map- ping baseline conditions can help inform policies around transportation, connectivity, siting, and industry.	Air quality (ozone, pm 2.5)
Having a reference inventory of sites allows for improved mitigation, siting, and monitoring of sites	Inventory of permitted and clean up sites

**SAMPLE OF OPR-RECOMMENDED DATA FOR CONSIDERATION IN ANALYSIS OF THIS ELEMENT**

### Promotion of Public Facilities

#### Requirement Description:

The general plan must identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by promoting public facilities. Under government code section 65302, “public facilities” include, but are not limited to, public improvements, public services, and community amenities, as defined in subdivision (d) of Government Code section 66000.

#### General Public Facilities Considerations

Access to resources is an important component of a [livable, vibrant community](#). Ensuring access to public services and community amenities such as libraries, public transit, parks, and other amenities is important to promote [access to opportunities](#).

### SAMPLE OF OPR-RECOMMENDED DATA FOR CONSIDERATION IN ANALYSIS OF THIS ELEMENT

Intent of Analysis	Recommended Data
Overall balance of resources is important to create a livable community.	Location of amenities such as parks, public transit, libraries.

### Promotion of Food Access

#### Requirement Description:

The general plan must identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by promoting food access.

#### General Food Access and Health Considerations

Access to healthy food has become a greater priority as the percent of obese adults and children has been on the rise. Health conditions related to obesity such as high blood pressure, high cholesterol, heart disease, diabetes, and cancer are also rising. In addition to public health messages targeted at individual behavior, the strategy also includes policy around food access. Research shows it is not just one approach, but multi-pronged approaches that are needed to support healthy food consumption. Creating access without addressing affordability, for instance, will not necessarily help change consumption of healthy food. Some jurisdictions have combined policies that address infrastructure and food access with community education and programming.

Over consumption of less nutritional food is a component of the problem in addition to lack of access to healthy, fresh food. Some areas struggle with food deserts, which are areas that do not have adequate physical access to nutritious healthy foods.<sup>ix</sup> Many Californians have experienced food insecurity, defined as a time when they could not afford enough food or had to forgo other basic life expenses to buy food.<sup>x</sup> Food

insecurity is broadly considered to have three pillars 1) availability, 2) access, and 3) utilization. Although individuals make food choices, those choices are made within the context of what is accessible and affordable or available. Food insecure households are often the same ones that struggle with obesity. New research also shows the lifetime risk of developing diabetes during an average lifespan in the US population has increased to nearly 40 percent, further supporting the need to improve nutrition.<sup>xi</sup> Planning policies and practices can help improve access, a critical factor to better nutrition.

Increasing access to healthy foods can occur in multiple ways, such as zoning for and streamlining project approvals for opening grocery stores in underserved areas, providing policies to increase access to farmer's markets, promoting community gardens, working with local convenience stores to increase affordable fresh produce selection, and using food procurement policies.

California is the largest and most diverse producer of healthy foods and commodities in the nation. The American Planning Association recently completed a national scan of planning documents addressing food issues, and compiled findings into a policy report, *Planning for Food Access and Community Based Food Systems*. CDFA's *Farm to Fork* office provides information on programs to improve food access. In addition, local and regional collaboratives can help address food access issues on a larger scale, including evaluating policies that cover the range of food system issues from production, distribution and

Food to Share, a program of Metro Ministry has been able to carry forward work from the General Plan update to improve food access, reduce waste, and improve environmental sustainability.

*(add link to case study)*

processing, access and consumption, through the end of the cycle to waste disposal.<sup>xii</sup> According to the USDA, "a community food system is one in which 'food production, processing, distribution and consumption are integrated to enhance the environmental, economic, social and nutritional health of a particular place.'"<sup>xiii</sup>

It is important to address food access as part of the entire food system. General plans can support protecting agricultural land for production as well as establishing a framework to support and encourage local food production in the form of community gardens and supportive zoning. Regional metropolitan planning organizations must also consider financial incentives for improving, among other things, farm to market and interconnectivity transportation needs (*Gov. Code § 65080(b)(4)(C)*). Integrated transportation systems connecting regional networks can ensure distribution and processing that has a lower carbon footprint and is more sustainable. Also, local access can help reduce trip generation, promote locally sourced food, and support mixed use for food retail, farmers markets, and other food stores. Waste disposal has been a component of some local general plans as local jurisdictions have gone toward zero

waste policies. Some jurisdictions, including Fresno, Orange County, Los Angeles, and San Diego, have combined food recovery programs to reduce waste going to compost and ensuring the food is delivered to those most in need. This work also aligns with [SB 1383 \(2016\)](#) which requires a goal of at least 20% food recovery for human consumption by 2025 ([Pub. Resources Code § 42652.5\(a\)\(2\)](#)).

**SAMPLE OF OPR-RECOMMENDED DATA FOR CONSIDERATION IN ANALYSIS OF THIS ELEMENT**

Intent of Analysis	Recommended Data
Eating more fruits and vegetables is a behavior that can be supported through more access to healthy, affordable options. Examining a baseline condition can inform policy around food systems and location of services.	Consumption of daily fruits and vegetables
Having access to adequate, affordable, and healthy food is important to health. Examining a baseline condition of those suffering from food in- security can inform policy around food systems and location of services	Self-reported food insecurity
Creating an inventory of available vacant public and private lands can help identify lands for conversion into community gardens, urban farming, or small parks.	Number of unused or under-utilized property per tax assessor records
Mapping baseline food retail and access conditions can identify areas that might not have adequate access and inform policy priorities and decisions for siting.	Food retail, community garden, and farmer market location

**Promotion of Safe and Sanitary Homes**

**Requirement Description:**

The general plan must identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by promoting safe and sanitary homes.

**General Housing and Health Considerations**

Housing location, quality, affordability, and stability have [health implications](#).<sup>xiv</sup> The [housing element](#) allows jurisdictions to identify opportunities and adopt policies to promote positive health outcomes. The housing element provides a unique opportunity to examine existing and future housing needs with a focus on lower income and special needs households. A housing element can strategically identify capacity for future housing. State housing law, including the [Regional Housing Need Allocation \(RHNA\)](#) process, a.k.a, “fair share” planning, fundamentally addresses equity issues, and related planning and zoning laws require regional and local governments to adopt plans for increasing, improving and preserving the State’s housing supply for everyone.

Location of housing plays a central role in how individuals and families engage in their communities. Neighborhoods with accessible transit and active transportation infrastructure offer opportunities for access to employment, schools, and services. Housing located near parks and green space provides recreational opportunities. Housing that is sited near amenities such as grocery stores can also have the co-benefit of influencing the ease of access to fresh food and produce.

The quality of available housing stock has direct health implications. Older housing that has not been maintained or updated can lead to physically unsafe conditions such as pest infestation, water intrusion, mold, poor insulation, and exposure to toxins such as lead. Water intrusion, poor insulation, and mold can exacerbate respiratory illnesses such as asthma and chronic obstructive pulmonary disease. Exposure to lead, a known neurotoxin, can have lifelong health consequences for young children. Some local jurisdictions have incorporated programs to weatherize and modernize homes that also have environmental and health benefits.

In addition to the quality of housing, affordability is a key factor. Access to affordable housing helps alleviate undue stress suffered from unstable living conditions. Often, since families are on fixed incomes, affordable housing allows them to use remaining income towards other goods and services, health care needs, and basic necessities such as healthy food. When housing prices rise, household occupancy rates often increase, becoming overcrowded, leading to unsafe living conditions and increased risk for spread of infectious disease. Rising rents can also lead to displacement of residents resulting in a disruption of social networks and school attendance, and can change the fabric of the local community. Local jurisdictions are pursuing various planning mechanisms to try to prevent [displacement](#). Given the health impacts of having access to safe, decent, and affordable housing it remains critical jurisdictions appropriately plan for variety of housing types.

Housing policies can also incorporate protective health measures through smoke-free zones and incorporate policies to limit smoking in shared public places such as parks and multi-unit housing.

California passed several pieces of legislation in 2017 as the Legislative Housing Package to provide new funding for affordable housing, streamline planning, and preserve existing affordable housing. These new efforts will help to implement policies developed in the general plan ensuring improved access to safe and sanitary homes. [See Housing Element](#).

#### **SAMPLE OF OPR-RECOMMENDED DATA FOR CONSIDERATION IN ANALYSIS OF THIS ELEMENT**

Intent of Analysis	Recommended Data
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This can be assessed to track and analyze risk of displacement	Housing cost burden
This population can face unique environmental justice exposures, understanding the numbers can help for planning for improved access and programming	Homelessness data
Understanding characteristics such as single parent households, larger family households, age, etc. can help inform priority amenities in an area	Population by household type
An inventory of age of housing stock can help inform planning for housing growth and future development	Age of housing stock
An inventory of affordable housing can help inform planning for housing growth and future development	Affordable housing

**Promotion of Physical Activity**

**Requirement Description:**

The general plan must identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by promoting physical activity.

**General Physical Activity and Health Considerations**

Designing spaces to promote physical activity can improve health outcomes for communities. The design of the physical environment can either facilitate active transport or serve as a barrier. The National Household Travel Survey (2009) shows that approximately 50% of the trips people make are under 3 miles away, and almost a quarter are within a mile.<sup>xv</sup> How design is implemented at the local level can facilitate walking and biking to accomplish these trips. Physical inactivity is one of the key contributors to chronic disease in California.<sup>xvi</sup> Inactivity is linked to obesity, the second leading cause of preventable death in the United States.<sup>xvii</sup> Increasing physical activity is one of the most important contributors to improved health; it helps control weight, reduces the risk of cardiovascular disease, type 2 diabetes, osteoporosis, and some cancers as well as improving mental health and well-being. Only half of Californians meet the recommended daily activity: about thirty minutes a day for adults and one hour for children.<sup>xviii</sup> In 2011, 30.4% of California Children age 10-17 were overweight or obese.<sup>xix</sup> In 2013, 30.2% of adult Californians were obese.<sup>xx</sup> Obesity increases the risk for many chronic diseases such as diabetes, high blood pressure, high cholesterol, heart disease and many cancers.

A more active lifestyle can help reduce the risk of obesity. Access and proximity to safe places for physical activity, including parks, are significant predictors of physical activity levels.<sup>xxi</sup> Active living incorporates physical activity into one’s daily routine such as walking to perform errands, active transportation to work, walking or biking to school,

or accessing nearby open space to pursue recreation. More equitable access to infrastructure to support active transit has the potential to help reduce some of the disparate health outcomes seen across California.

Active transportation options allow for less time spent in vehicles. In addition, greater individual activity also helps reduce Vehicle Miles Traveled (VMT) resulting in less greenhouse gas (GHG) emissions and improving air quality. Many local jurisdictions have developed active design guidelines that can also complement General Plan Policies. Planning connected bike and pedestrian paths increases alternatives to auto use. The [design needs](#) for safety for pedestrian and bike thoroughfares differ. Both transit oriented development (TOD) and infill development also create an opportunity for more active lifestyles. [Complete Streets](#) and multimodal, interconnected transit allow access to services, housing, school, open space recreation areas, and other amenities without the need for vehicles. In conjunction with a robust public transportation system, first and last mile policies – addressing the need to provide connections between destinations and the beginning or end of transit – ensure increased access. Additional infrastructure such as covered rest areas, shade, age friendly seating, and bike storage are important to increase utilization. Interagency cooperation with other districts or entities can allow for creative and cost effective solutions such as [easements for trail networks](#). If pedestrian and bike plans exist, they should be complementary to the general plan update.

The [Sustainable Communities and Climate Protection Act of 2008 \(SB 375\)](#), promotes regional coordination of [transportation](#) and [land use](#) planning, including support of active transportation. These policies help reduce the burden of transportation on the environment, improve air quality, and help communities be more active. Including policies that prioritize more forms of active transportation in general plans will strengthen potential for regional transportation plans to meet GHG reduction targets established pursuant to SB 375 (2008).

Due to recent federal legislation, the statewide funding mechanisms to support active transportation have been evolving. The [Active Transportation Program](#), enacted via Senate Bill 99 in 2013, is a new program to fund pedestrian, bicycle, and [Safe Routes to School programs \(SRTS\)](#). This program ensures that at least 25% of program funding benefit disadvantaged communities. In 1969, nationally, almost half of the children between the ages of 5-14 walked or biked to school, but that number has plummeted to 13% in 2009. While the reasons for this are many, factors include the distance to school, school siting, safety of the area, and physical conditions on the route to school. Programs that promote walking or biking to school help achieve daily-recommended physical activity. Improving infrastructure and safety also increase the ability of children to walk or bike to school as desired. Several resources are available to integrate SRTS policies.<sup>xxii, xxiii</sup> Although [school siting](#) decisions are not controlled by the general plan,

the general plan process can promote coordination with school districts and help align school modernization and reinvestment with the general plan.

Promoting active lifestyles can also be accomplished by ensuring disadvantaged communities have adequate access to recreation opportunities through parks and open space. Access to parks and green space correlates with decreased rates of obesity in adults and children. Parks and recreation programs have the added benefit of improving mental wellness and contributing to community building. Furthermore, parks and green space can improve air and water quality. The EJ element or policies incorporated throughout can identify areas in disadvantaged communities that are “park poor” and promote parks in those areas by prioritizing park improvements (such as lighting, infrastructure, or other needed improvements) or identifying possible future locations for parks in those areas.

Planning for active lifestyles also benefits the elderly. The “aging in place” concept focuses on enabling seniors to stay in their own homes and communities. Also known as Naturally Occurring Retirement Communities (NORC), these areas prioritize creating walkable communities to accommodate their needs and provide access to full services such as stores, clinics, and social programming. Furthermore, providing parks and natural recreation opportunities and access to green space is vital to good health, allowing easy access to physical activity and relief from urban stress. The presence of quality park amenities, proper maintenance and upkeep, physical activity programming, and conditions free of crime, all can greatly impact community use of parks and their potential to improve community health. As more compact development occurs, it is important to ensure access to adequate green space for all community members. In locations that have limited green space or existing infrastructure, innovative public-private partnerships or agreements such as joint use or [shared use agreements](#) with schools, places of worship, or other private property can be a mechanism to increase access to safe places where the community, particularly children, can be active. Policy guidance exists specifically for working with school districts.<sup>xxiv</sup> Considering safety and social cohesion are also necessary components to supporting physical activity. See a further discussion in the [Healthy Community Chapter](#).

**SAMPLE OF OPR-RECOMMENDED DATA FOR CONSIDERATION IN ANALYSIS OF THIS ELEMENT**

Intent of Analysis	Recommended Data
Obesity is caused by many factors, but lack of access to healthy foods and physical activity are significant contributors. Examining baseline status can help with policy decisions around active transportation, recreation priorities, and food system policies.	Obesity (child and adult) prevalence
Access to parks allow for physical activity and can be helpful to reduce chronic disease	Map park locations



These diseases, also caused by many factors, are often associated with obesity. Examining baseline status can help with policy decisions around active transportation, recreation priorities, and food system policies.	Secondary diseases from obesity (high blood pressure, high cholesterol, heart disease, type 2 diabetes prevalence)
Many accidents involving pedestrians and bicycles could be improved through infrastructure, design, and signage. Examining a baseline can inform policy and planning for transit routes, active transportation, and safety.	Unintentional injury such as pedestrian and bicycle accidents
Walk trips is a behavior that benefits health and is influenced by the environment. Examining a baseline number can help inform active transportation and for climate change and resiliency policy.	Walk trips per capita
Children walking, biking, or rolling to school is a behavior that can improve health and is influenced by the environmental conditions such as distance to school and safety. Examining the baseline condition can inform policy priorities around active transportation, active design, school siting, and housing siting.	Percent of children who walk, bike, roll to school
Commuting decisions also can be influenced by connectivity, cost and ease of use. Active transportation can have positive health benefits since people are able to achieve higher physical activity. Examining the baseline can inform policy priorities around active transportation, mixed-use developments, job locations, and housing locations.	Percent of commuters who use active transportation
Mapping baseline walk and bike conditions can help create a more connected network for improved use.	Walk and bike maps
Mapping baseline conditions can help identify areas that could benefit from improved transportation options	Public transit facilities
Safety in the neighborhood can impact social stress and influence whether people will be active. Establishing a baseline condition can help inform safety policies such as crime prevention through environmental design.	Percent of people that feel safe in their neighborhoods

**Promote Civil Engagement in the Public Decision Making Process**

**Requirement Description:**

The general plan must identify objectives and policies to promote civil engagement in the public decision making process.

The [Community Engagement and Outreach chapter](#) provides detailed guidance on ways to effectively engage with the community. Community Engagement is a fundamental part of any general plan update to inform the community vision. It is particularly important with respect to EJ because it allows communities that have often not been included in the planning process to be engaged in the decisions that impact their health and well being. As discussed in the [Community Engagement and Outreach Chapter](#), EJ groups and residents of disadvantaged communities can be considered to be part of an advisory board, steering committee, or working group to help guide the planning or implementation process, or to participate in specific stakeholder engagement meetings, planning workshops, or focus groups. Additionally, while setting up the outreach paying attention to issues such as literacy, socioeconomic status, languages spoken, age, local history, and cultural norms are all important.

**SAMPLE OF OPR-RECOMMENDED DATA FOR CONSIDERATION IN ANALYSIS OF THIS ELEMENT**

Intent of Analysis	Recommended Data
This can help assess different segments of the population. For instance, elderly populations might need more time to cross the street or need specific accommodations to use public transit. Understanding the population distribution and locations in the community can help both with engagement and planning to track and analyze risk of displacement	Population by age
Understanding the ethnic distribution throughout the city and/or county can help inform languages used in outreach and cultural considerations for engagement.	Population by race/ethnicity
Understanding the languages spoken in the area covered by the general plan can help inform how to design outreach and engagement opportunities.	Languages spoken

**Prioritize improvements and programs that address the needs of disadvantaged communities**

**Requirement Description:**

The general plan must identify objectives and policies to prioritize improvements and programs that address the needs of disadvantaged communities.

Many disadvantaged areas have not had sufficient support in terms of improvements and programs. Establishing specific policies to elevate improvements and program needs for disadvantaged communities is a strategy to improve access to opportunities, health, and well-being. The objectives and policies will depend on the areas identified by the local community for improvement. As a result, identifying the needs of

disadvantaged communities as well as how the general plan could meet those needs should originate from and involve community input.

### Reduce Unique or Compounded Health Risks

#### Requirement Description

The general plan must identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities not otherwise addressed by the specific policy areas outlined above. In order to reduce the health risks of disadvantaged communities, the local government should start by identifying those unique or compounded health risks. Identifying health risks could start with reviewing the data outlined for other policy areas above, such as rates of asthma, cardiovascular disease, cancer, obesity, physical activity, and access to healthy food options. Community input can help to verify the accuracy of the identified health risks reflected in the data and to shape policies that can help reduce those health risks.

### Incorporation of Climate Change

**This is not a requirement in the statute, but is good planning practice and consistent with the safety element**

The general plan may incorporate considerations to address climate change through planning, infrastructure, EJ, and health impacts in the planning process.

### General Climate Change, Resiliency, and Environmental Justice Considerations

The natural environment supports human life. Humans, in turn, impact the natural environment. The most prominent example is **climate change** caused by greenhouse gases (GHGs). Climate change can have negative effects on health due to physical or mental harm or displacement from increased frequency or severity of disasters like flooding, drought, fire, and landslides. Climate change may not only increase existing risks but will also pose new threats to human health. The **Safety Element** is required to analyze and address the impacts of climate change on the community, and CEQA required climate change be addressed through GHG emissions reduction, many times through plans to reduce GHG emissions developed in coordination with general plans (see **Chapter 8: Climate Change**). The **California Department of Public Health** provides **recommendations and publications** dealing with health and climate change. While climate change will be one of the biggest threats to public health for decades to come, land use planning can help communities prepare, adapt, and reduce GHGs that cause climate change. It is also known that climate change can disproportionately impact the most vulnerable communities, often already suffering



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from other EJ issues. The [safety element](#) already requires consideration of natural hazard areas, to avoid or mitigate for potential hazards including fires, flood zones, earthquakes, and landslides. Explicit consideration of health and EJ issues provides an opportunity to improve resilience of local communities, especially [vulnerable populations](#). There are many definitions of vulnerable populations and disadvantaged communities. The Integrated Climate Adaptation and Resiliency Program was established in OPR to help coordinate climate activities across the state. The Technical Advisory Council adopted a definition for vulnerable communities. Although the definition for vulnerable populations is different from the statutory definitions of Government Code section 65302, it is aligned and the table below demonstrates different data that can be used to inform planning for adaptation and resilience.

Some health effects of climate change are already occurring due to increasing temperature. Temperature records continue to be broken with increasing temperatures on record.<sup>lvii</sup> Temperatures in urban areas can exacerbate already warm conditions due to materials, such as asphalt absorbing heat and then releasing it, causing urban heat islands. Increased exposure to heat puts children, elderly, and people with pre-existing health conditions at more serious risk to suffer from heat stroke and heat-related complications. Studies show increased mortality during times of high heat.<sup>lviii</sup> In fact, according to the [Center for Disease Control](#), between 1979 and 2003, more people prematurely died from extreme heat-related illness than the total combined deaths from other natural disasters including tornadoes, floods, earthquakes, hurricanes, and lightning.<sup>lix</sup>

[Land use](#) policies to promote efficient circulation, conservation, and recapture of water are needed for water conservation and drought mitigation. Additionally, it is important to control for pools of stagnant water. As water pools, without natural systems such as certain fish populations, there is an increased risk for mosquito reproduction. With higher mosquito populations, strong pesticides – that can affect health – are required to spray to contain mosquito populations. Scientists predict that vector borne diseases will change in the future as a result of climate change. More tropical diseases not previously experienced in California, such as dengue and yellow fever, may emerge. In 2013, the particular mosquito that carries dengue was found in California. Land use policies to conserve water and prevent large-scale stagnant pools will be key in combating and containing such health risks.

[Land use](#) planning to reduce urban heat island effects is essential to creating more resilient communities. Increased urban greening and cool surfaces, which have a high-albedo effect, reflecting higher portions of radiation and thus absorbing less, can decrease temperatures and lessen the effects of extreme heat. Green roofs can also have health benefits by reducing exposure to heat with the added benefit of better air quality. Healthy tree canopies can also provide shade from heat, help with carbon

capture, and improve air quality.<sup>lx</sup> Land use planning can also help to ensure the availability of water resources for cooling purposes.

With climate change, there is a growing recognition of the need to preserve limited resources such as water, fertile ground for agriculture, energy, and clean air. All of these actions are vital for human health.

Climate change also has the potential to harm agricultural yields. Ensuring adequate food supplies to feed the population and avoid famines will require preservation of agricultural land. Land use policies that identify and avoid development on prime [agricultural land](#) are important to protect California’s food supply.

Energy conservation programs have potential health co-benefits. When developments are planned to use less energy they can reduce energy bills and allow families to use the savings towards other expenses. Additionally, energy efficiency measures may align with opportunities to improve indoor air quality, which can reduce costs of respiratory illness such as asthma.<sup>lxi</sup>

**SAMPLE OF OPR-RECOMMENDED DATA FOR CONSIDERATION IN ANALYSIS OF THIS ELEMENT**

Intent of Analysis	Recommended Data
Understanding areas at risk for extreme heat can help inform policy decisions to impact community resilience.	Extreme heat
Increasing tree canopy can help with carbon capture, provide shade from high heat, and improve the physical appearance of the community.	Tree canopy
Understanding projected sea level rise can help inform policies for future building and communities at risk.	Sea Level Rise

**Additional Data Sources for Equity and EJ**

- **Census Data:** The United States Census collects data on a range of factors. The [American Community Survey](#) is conducted annually.
- **Regional Opportunity Index, UC Davis Tool:**<sup>xxv</sup> This tool provides an index based on social, economic, and environmental indicators for review and analysis by local residents, program managers, and policy makers to inform investment decisions.
- **Local data:** Local data on amenities available.

- **Envirostor:** The Department of Toxic Substances Control hosts this program. It is a database that provides data in a GIS form to identify contaminated sites as well as facilities that deal with hazardous waste.
- **Cal Enviroscreen:** The Office of Environmental Health Hazard Assessment (OEHHA) in the California Environmental Protection Agency created this online mapping tool. It is a tool that can help identify communities that are burdened with high levels of pollution.
- **California Environmental Health Tracking Program:** The California Department of Public Health created this online mapping tool. It is a tool that helps identify environmental risks associated with health outcomes such as poor air quality and asthma.
- **Climate Change and Health Vulnerability Indicators for California:** The California Department of Public Health maintains these indicators to assess exposures, social vulnerability, and adaptive capacity for areas across California.
- **Healthy Places Index:** This index was created and is maintained by the Southern California Health Alliance. OPR worked with the team to align data sources with SB 1000 requirements. It provides GIS mapping capability and combines 25 community characteristics into one value. Additionally, data layers can be separated out for additional analysis.
- **500 Cities-Local Data for Better Health:** The Centers for Disease Control maintains health data for the 500 biggest cities across the US, many located in California.
- **Cal-Adapt :** UC Berkeley developed this tool for the State of California with oversight by the California Energy Commission and others to create a resource library of reliable scientifically supported data to inform climate planning.
- **Urban Heat Island Index:** The California Environmental Protection Agency maintains this data source to reflect heat islands.
- **US EPA's EJSCREEN:** This mapping and screening tool contains a nationally standardized dataset with 11 environmental indicators, 6 demographic indicators, and 11 EJ indexes.
- **CARB Air Monitoring site:** The California Air Resources Board collects air quality data from over 40 locations throughout the state and disseminates information about ambient-level pollutant trends, air modeling and forecasting.
- **CARB pollution mapping tool:** This tool provides a map of large industrial facilities across California as well as numerical data on the greenhouse gases (GHG), criteria pollutants and toxic air contaminants of each facility .
- **CalEPA Regulated Site Portal:** This portal provides data on environmentally regulated activities across California that pertain to hazardous materials and waste, state and federal cleanups, impacted ground and surface waters, and toxic materials.
- **CHAT Tool:** The California Heat Assessment Tool was created as part of California's Fourth Climate Change Assessment in order help local communities identify changes to heat health events and identify areas of vulnerability.

**OPR Recommended Policies**

These policies are an example of recommended policies adopted by varying jurisdictions, to be modified and used as appropriate. A full list of recommended policies and examples can be found [here](#).

Sample Policy	Example of Application	Relationship to Other Elements
[City, county] shall consider environmental justice issues as they are related to potential health impacts associated with land use decisions, including enforcement actions to reduce the adverse health effects of hazardous materials, industrial activity and other undesirable land uses, on residents regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location	National City	Healthy Community, Land Use
[City, county] shall concentrate commercial, mixed-use, and medium to high density residential development along transit corridors, at major intersections, and near activity centers that can be served efficiently by public transit and alternative transportation modes	National City	Land use, circulation, healthy communities
[City, county] shall encourage smoke free workplaces, multifamily housing, parks, and other outdoor gathering places to reduce exposure to second-hand smoke	National City	Healthy communities, housing
[City, county] shall consider environmental justice issues as they are related to the equitable provision of desirable public amenities such as parks, recreational facilities, community gardens, and other beneficial uses that improve the quality of life	National City	Land use, open space, healthy communities
[City, county] shall ensure that affected residents have the opportunity to participate in decisions that impact their health	Jurupa Valley	Healthy communities
[City, county] shall incentivize affordable housing through permit streamlining and financial incentives	Jurupa Valley	Housing, healthy communities