

**COUNTY OF SACRAMENTO
CALIFORNIA**

PLANNING COMMISSION REPORT

For the Agenda of:
October 28, 2019

To: Planning Commission

From: Office of Planning and Environmental Review

Subject: PLNP2018-00119. Adoption Of The Phase 2 Environmental Justice General Plan Amendment Package. Applicant: County Of Sacramento – Office Of Planning And Environmental Review. APNs: Countywide. Environmental Determination: Exempt.

Supervisorial District(s): All

Contact: Tim Kohaya, Associate Planner, (916) 874-5982, kohayat@saccounty.net

Details of Request:

1. A **General Plan Amendment** to replace the Phase 1 Environmental Justice Element with the Phase 2 Environmental Justice Element. The purpose of this amendment is to include additional environmental justice (EJ) policies and implementation measures to the EJ Element that was adopted by the Board of Supervisors (Board) on May 8, 2018.
2. **Adoption of the Supporting Research Document** comprised of staff research that supports many of the policies and implementation measures contained in the Phase 2 EJ Element.
3. A **General Plan Amendment** to amend the Agriculture, Air Quality, Economic Development, Land Use and Public Facilities Elements of the General Plan. These amendments are all related to EJ and support adoption of the Phase 2 EJ Element by amending existing policies and implementation measures, adding new policies and implementation measures, removing redundant policies and moving existing policies and implementation measures to the EJ Element for consistency and ease of use.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

Applicant:

Sacramento County Office of
Planning and Environmental Review (PER)
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Summary of Key Points:

Senate Bill 1000 (SB 1000), the Planning for Healthy Communities Act, requires cities and counties with disadvantaged communities to incorporate EJ policies into their general plans. Unincorporated Sacramento County (County) contains disadvantaged communities in Arden-Arcade, North Highlands, South Sacramento, and Vineyard and is therefore required to meet the requirements of SB 1000. The County must identify objectives and policies that “reduce the unique or compounded health risks in disadvantaged communities” and these objectives and policies must cover the following required EJ-related topical areas and others if needed.

- Reduction of Pollution Exposure, Including the Improvement of Air Quality
- Promotion of Public Facilities
- Food Access
- Safe and Sanitary Homes
- Physical Activity

SB 1000 also requires the County to identify objectives and policies to promote civil engagement in the public decision making process and prioritize improvements and programs that address the needs of disadvantaged communities.

To meet the requirements of SB 1000, staff divided the EJ Element into two phases. Phase 1 consisted of preparing the initial version of the EJ Element with a limited number of policies. The Board adopted the Phase 1 EJ Element on May 8, 2018. This action enabled the County to achieve minimal compliance with SB 1000 and meet the State mandated deadline. Phase 2 consisted of extensive public engagement and the development of additional policies that will augment and strengthen existing EJ-related General Plan policies. As in Phase 1, the geographic focus of this effort was Environmental Justice Communities (EJ Communities) (Attachment 1).

The approval of the Phase 2 EJ General Plan amendments will allow the County to meet and exceed the minimum requirements of SB 1000.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

Recommendation:

These actions are recommendations to the Board.

1. Recognize the exempt status of the request under Section 15061(b)(3) of the California Environmental Quality Act (CEQA).
2. Adopt the resolution recommending that the Board approve the amendments to the General Plan subject to the findings listed in this report.
3. Recommend that the Board adopt the Supporting Research Document (Attachment 2) comprised of staff research that supports many of the policies and implementation measures contained in the Phase 2 EJ Element.

PROJECT BACKGROUND

In 2016, the State Legislature adopted SB 1000, the Planning for Healthy Communities Act, which requires local municipalities with disadvantaged communities to incorporate EJ objectives and policies into their general plans. This could occur either as part of a separate new element or as additions to existing elements. EJ seeks to minimize and equalize effects of environmental hazards among the entire community regardless of income, ethnicity, or race.

In response to SB 1000, the County opted to create a new EJ Element to incorporate EJ objectives and policies into its General Plan. Because of the limited time before the State-mandated deadline to comply with SB 1000, staff undertook a two-phase process for developing the EJ Element. Work for Phase 1 included completing most of the baseline research, scoping existing policies, and preparing a limited number of policies. The Board approved the Phase 1 EJ Element on May 8, 2018. Upon adoption of the Phase 1 EJ Element, staff commenced work on the Phase 2 EJ Element, which included extensive public outreach and policy development.

Like the Phase 1 EJ Element, the Phase 2 EJ Element (Attachment 3) has sections that cover required and optional topical areas. The following is a list of topical sections contained in the Phase 2 EJ Element:

- Prioritizing Improvements and Programs That Address the Needs of EJ Communities
- Civil Engagement in the Decision-making Process
- Crime Prevention (optional addition)
- Healthy Food Access
- Physical Activity
- Promote Public Facilities
- Reduce Pollution Exposure
- Safe and Sanitary Homes

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

The geographic focus of analysis and most of the policies in the EJ Element are the four EJ Communities that were adopted as part of the Phase 1 process: North Highlands/Foothill Farms, North Vineyard, South Sacramento, and West Arden-Arcade (Attachment 1). Staff used two sources to determine the boundaries of the EJ Communities. One source was the CalEnviroScreen 3.0 web tool, which cities and counties can use to determine whether disadvantaged communities are present within their boundaries. CalEnviroScreen identified disadvantaged communities by using environmental, health, and socioeconomic factors. The other source was the Sacramento Area Council of Governments' (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The MTP/SCS had identified as part of its environmental justice analysis, neighborhoods with high percentages of low income and/or minority residents.

Phases 1 and 2 Baseline Research – Supporting Research Document

The Supporting Research Document (Attachment 2) is a comprehensive collection of baseline research conducted by staff during Phases 1 and 2 of the EJ Element project. This research compared conditions existing in EJ communities with those existing in non-EJ areas for each of the EJ topical areas. Most of the identified inequities between EJ communities and non-EJ areas led to the development of policies and/or implementation measures that addressed those inequities.

Phase 2 Policy Development

A major task for the Phase 2 portion of the EJ Element project was to develop policies and implementation measures for the topical areas covered by the EJ Element. Using the findings of the baseline research, staff and members of the EJ Element Advisory Committee (Advisory Committee) collaborated to develop an initial list of policies and implementation measures. Staff organized this committee to assist in policy development and public engagement.

Staff later modified many of the initial policies and implementation measures in response to public comments and web survey results attained during the public engagement process. Staff also added new policies and implementation measures and has compiled a comprehensive list of all proposed policies and implementation measures (Attachment 4).

Phase 2 Public Engagement

To assist with policy development, staff implemented an extensive public engagement effort consisting of "pop-up" booths at community events, a web survey, community workshops, and community meetings. The purpose of this effort was to confirm baseline research (ground-truthing), determine priorities, identify community issues, and provide a forum for residents to

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

propose policy ideas that address issues important to them. Staff set up a pop-up booth at seven community events during the summer and fall of 2018 where booth visitors took a survey to receive a small prize. Staff tabulated the responses and prepared summaries (Attachment 5). There were over 100 responses from individuals from EJ Communities. Conclusions based on the summaries include the following:

- Crime and the perception of increasing crime is a major issue in all of the EJ Communities, and particularly in West Arden-Arcade. Surveys taken at pop-events in Arden-Arcade showed that almost 50 percent of the respondents did not feel safe in their neighborhoods.
- A number of North Highlands/Foothill Farms and Arden-Arcade residents have expressed concern about the lack of bike lanes and sidewalks in their community.
- Access to a grocery store or other sources of fresh fruits and vegetables is an issue with approximately 30 percent of those who took the survey.

Staff, with assistance from the Advisory Committee, also developed a web survey that asked survey participants to answer questions by choosing three items from a list. Each question was related to an EJ topic and selected items enabled staff to determine respondent's priorities. The web survey was open to the public during October and November 2018 and only residents who lived in identified EJ zip codes were allowed to take the survey. Almost 500 individuals from EJ Communities took the survey. Staff prepared summaries of the responses (Attachment 6) and prepared a summary of the most common responses (Attachment 7). Conclusions based on the summaries include the following:

- The most needed public facilities in each of the EJ Communities are street improvements. EJ Communities also need streetlights. Homeless shelters are within the top four most needed public facilities in all of the EJ Communities except North Vineyard.
- The high cost of fresh fruits and vegetables is the main reason people are having difficulty getting these items for their families.
- Bike lanes along roadways that have high traffic volumes and speeds are keeping many people from bicycling more. The fear of crime is also keeping many people from bicycling and walking more.
- The high cost of housing is the most important housing issue in all four EJ Communities. Housing overcrowding is an important issue in the North Highlands/Foothill Farms and South Sacramento communities.
- Vacant lots with trash or junk is the most pressing pollution problem in all of the EJ Communities except Vineyard. Air pollution from cars and trucks is another pollution problem in EJ Communities.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

- A major reason people do not participate in public meetings on topics that affect their neighborhoods is that they think that meeting organizers will not take their opinions seriously. Another reason is that people feel the meetings will be a waste of time.

To provide more opportunities for public input, staff and Advisory Committee members conducted community workshops in West Arden-Arcade (October 16, 2018), South Sacramento (October 25, 2018), and North Highlands (January 22, 2019). Each workshop started with a short presentation on EJ and the EJ Element project. After the presentation, there were three discussion sessions where workshop participants could go to a discussion group covering a particular topic. In each discussion group, participants identified community issues and ways to address those issues. After the meetings, staff tabulated the comments by topic (Attachment 8). Some of the most relevant comments for policy development include the following:

West Arden-Arcade Workshop:

- The County should consider making changes to the Affordable Housing Program such as including inclusionary housing.
- The County should prioritize EJ Communities for "Complete Streets" and other street improvement programs that include sidewalks and bike lanes.
- There is an overconcentration of liquor licenses in Arden-Arcade. Off-sale liquor license applications should be required to get a use permit from the County.

South Sacramento Workshop:

- To reduce crime in South Sacramento, there needs to be more job development and training in the community. The County also needs to support youth programs in EJ Communities.
- Similar to the Arden-Arcade workshop, there was support to change the Affordable Housing Program to include inclusionary housing.
- Similar to the Arden-Arcade workshop, there was support for prioritizing street improvements for EJ Communities.

North Highlands Workshop:

- North Highlands/Foothill Farms needs more street lighting, particularly in residential neighborhoods.
- Bicycling on roads in North Highlands/Foothill Farms is not safe. There is a need to have separation from cars, preferably bikes having their own separate trails.
- Abandoned homes are a problem in North Highlands/Old Foothill Farms. The banks have boarded up foreclosed homes and these homes have been empty for years.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

Staff has also met with “hub” organizations – organizations that network with numerous other organizations in an EJ Community. Staff gave these organizations an opportunity to provide additional input beyond the community workshops. Sacramento Area Congregations Together (Sacramento ACT), which has established itself as a hub organization for Arden-Arcade, elected to have its own workshop on the EJ Element on November 12, 2018, with County staff having a minor role. The Stephens Foundation, a hub organization for South Sacramento, also held a workshop on December 19, 2018, with staff in attendance. Comments from the Sacramento ACT and Stephens Foundation meetings have been summarized by staff (Attachment 9). Black Child Legacy (Liberty Towers Church Incubator), a hub organization for North Highlands/Foothill Farms, elected to be a partner with the County for the community workshop on January 22, 2019, with staff and Advisory Committee members leading the workshop.

Public Outreach and Policy Development

After the conclusion of the public outreach effort for the EJ Element Project, staff documented how public outreach comments (many of which are listed above) and web survey results, influenced the development of proposed policies and implementation measures (Attachment 10). These include the following:

- Multiple workshop participants at the South Sacramento and West Arden-Arcade community workshops supported changes to the County Affordable Housing Program. Comments to staff from Sacramento ACT also focused on this issue. In response, staff added a subsection on affordable housing in the Safe and Sanitary Housing Section. Within this subsection, there is an implementation measure that will require the Office of Planning and Environmental Review (PER) and the Sacramento Housing and Redevelopment Agency (SHRA) to review the existing Affordable Housing Program and Ordinance for potential changes as part of the next Housing Element Update.
- At the South Sacramento workshop, staff received comments from multiple workshop participants that there is a need to get to the root cause of crime, which includes lack of youth activities and unemployment. In response, staff added a subsection on supporting youth activities and another subsection on increasing job opportunities in the Crime Prevention Section. Each subsection has its own set of policies and implementation measures that are applicable to EJ Communities.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

- Workshop participants at all three community workshops commented that many bicycle lanes are unsafe and there is a need for more separation from cars, particularly on roadways with high traffic volumes and speeds. Staff received similar comments at the pop-up booths. In response, staff added a countywide implementation measure to the Physical Activity Section that requires bicycle circulation plans for new master plans and large infill projects be evaluated using the principles of low-stress bicycling. Staff also added to the same section another countywide implementation measure that requires the County Department of Transportation (DOT) to apply low-stress bicycling principles to Complete Streets Master Plans.

PROPOSED POLICIES AND IMPLEMENTATION MEASURES

The following sections provide details on some of the major proposals that are included in the Phase 2 EJ Element general plan amendment package.

Civil Engagement Section

Comprehensive Community Outreach Strategy

Staff is proposing a policy that supports equitable and comprehensive civic engagement and public outreach in all aspects of County governance and delivery of services. The proposed Community Outreach Strategy (Outreach Strategy) will be an implementation measure of this policy. The main purpose of the Outreach Strategy will be to foster meaningful two-way communication between County agencies and community members, with emphasis on removing barriers to engagement for those who live in EJ Communities.

Reaching residents in EJ Communities to develop two-way communication can be challenging. A key reason for this is that there is higher percentage of limited English speaking households in EJ Communities (especially South Sacramento) than there are in non-EJ areas (Attachment 11). These households may be disadvantaged when trying to obtain important information that affects their lives or trying to participate in the public decision-making process.

To enable two-way communication, the Outreach Strategy will have a list of recommended action measures that County agencies would be encouraged to incorporate into their public engagement programs, particularly programs that involve EJ Communities. One anticipated action measure is to utilize demographic data to reach community members who may be linguistically or culturally isolated because of language and/or cultural barriers. Another

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

anticipated action measure is to utilize a variety of communication techniques and social media tools to convey and receive information from the public.

Proposed Policy and Implementation Measure

The County supports an equitable and comprehensive approach to civic engagement and public outreach on all aspects of County governance and delivery of services. (Policy)

The County will create a comprehensive Community Outreach Strategy that serves as a framework for all departments to participate in meaningful two-way communication with the public on all aspects of County governance and delivery of services. (Implementation Measure)

Crime Prevention Section

New Off Sale Liquor Licenses

There are more convenience and liquor stores per 1,000 dwelling units in EJ Communities compared to non-EJ areas (Attachment 12). High densities of convenience and liquor stores can be problematic. A number of studies have shown that a high density of alcohol outlets in low-income areas is associated with higher rates of violent crime (Scribner et al., 1995; Gruenewald et al., 2006; Roman et al., 2008). That is, more assaults, domestic violence, and other violent crimes occur when convenience stores, liquor stores, and other alcohol-selling places cluster together in low-income areas. Thus, there is a need to explore limiting the growth of off-sale liquor licenses in EJ Communities, or conditioning them to address criminal and/or nuisance impacts. Although this issue has been identified in EJ Communities, a Countywide approach may also be appropriate.

The County has previously explored exercising more control over alcohol-related uses. In 2012, the County began considering the requirement for a conditional use permit (CUP) for alcohol sales. This effort particularly focused on convenience and liquor stores. The Board considered a Zoning Code Amendment package on December 11, 2012, that included a proposal to require use permits for off-sale alcohol licenses. The origin of that proposal was comments from Board members in the context of individual Public Convenience Necessity (PCN) hearings and frustration over the inability to condition the State-issued permits. The Board dropped the component of the amendment package related to alcohol and directed staff to notify potential business owners affected by the amendment and solicit input.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

Staff convened a workshop with business owners in March 2013. Approximately 150 participants attended that meeting. The majority of the attendees expressed objections including: a) existing businesses would be non-conforming with the need to obtain a certificate of Non-Conforming Use (NCS) within five years including; b) the potential to apply conditions on that NCS including restricting single sales; c) that the proposal more affected convenience and liquor stores, not large format grocery stores.

Staff took a revised proposal to the Planning Commission on August 12, 2013. The item moved on to the Board with a hearing on September 24, 2013. The proposal at that time would have required a CUP only for new convenience and liquor stores (thereby eliminating the trigger for an NCS) and with provisions allowing some expansions and site transfers. In addition, to address streamlining and timeliness, staff proposed that this type of CUP would go directly to the Board, bypassing the Planning Commission. Despite these changes, business stakeholders continued to express significant concerns. The Board adopted provisions for a Minor Use Permit (MUP) for restaurants, but the remainder of the item was continued to October 22, 2013, and then to the January 14, 2014 Board meeting when the item was dropped from the agenda. Staff then moved to considering other alternatives related to the regulation of alcohol, however, staff never took back a revised proposal to the Board for consideration.

The data is clear that renewed attention should be paid to alcohol related uses in EJ communities. To that end the public review draft of the EJ Element proposes the following policy:

The County will control uses requiring liquor licenses (particularly off-sale licenses) in EJ Communities where there is already an overconcentration of liquor licenses to reduce or eliminate nuisance or criminal impacts, particularly those that are leading to unique or compounded health effects on the community.

In recognition of past opposition to alcohol regulation, the current public review draft of the EJ Element provides two alternative implementation measures to support approaches to meeting the policy.

One approach includes the implementation measure directing PER staff to explore amending the Zoning Code to require Use Permits for liquor stores and convenience stores that have an off-sale alcohol license. In addition, this approach would explore whether or not liquor and convenience stores should be included for consideration as part of the County's distance separation and overconcentration requirements for certain uses. An off-sale liquor license (License Types 20 and 21) allows a business to sell liquor in original packaging

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

for consumption away from the business. Businesses that apply for an off-sale liquor license include liquor, convenience, and grocery stores. Currently, the Zoning Code allows these land uses by right in commercial zones.

A requirement for a Use Permit for convenience and liquor stores would allow County staff and hearing bodies to more thoroughly evaluate an individual request for neighborhood compatibility. It would also enable the County, including the Sheriff's Department, the ability to place reasonable conditions of approval on the project such as prohibiting sales of single containers and restricting hours of sales. However, staff recognizes the unintended negative consequences of such regulations, such as a stifling effect on reinvestment or limiting opportunities for convenient access to necessities. These consequences must be identified and eliminated to the maximum extent practicable.

A second approach would be to refine the County's process for PCN letters for off-sale liquor licenses in a way that addresses any nuisance or criminal impacts. Applicants for liquor licenses need to obtain a PCN letter from the County when the sales location is within a census tract designated by the State Alcoholic Beverage Control Board (ABC) as over-concentrated with liquor licenses. Applicants also need to obtain a PCN letter when the sales location is within a census tract determined by the Sheriff's Department to be a high crime area. Since most census tracts in EJ Communities meet these criteria, a liquor license applicant would most likely need a PCN letter from the County for liquor sales in an EJ Community. Enhanced conditioning during the PCN review process could address each community's specific unique and/or compounded needs. This is a near-term and cost effective means for improved internal review related to the PCN review process.

Proposed Implementation Measure

Explore amending the Zoning Code to require Use Permits for liquor stores, and convenience stores that have an off-sale alcoholic license, and to explore whether or not to include liquor and convenience stores for consideration in the County's distance separation and overconcentration requirements for certain uses.

The alternative implementation measure to the PCN option is as follows:

Refine the County's process for PCN letters for off-sale liquor licenses in a way that addresses any nuisance or criminal impacts.

During final preparations to release the public review draft EJ Element and subsequent to its release, several alcohol-related projects began moving

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

through the public process and staff, neighbors, advocates, and community representatives engaged by examining the projects through the lens of EJ. In response to the ongoing discussions prompted by this examination, staff has identified a third potential implementation pathway for exercising enhanced local control over alcohol-related uses that also provides the opportunity to address the auto-related uses and healthy food issues often associated with convenience markets. This approach would utilize amendments to the County Code (Chapter 4: Business Regulation) to control convenience markets through business licensing (an entirely local process) instead of relying on yes/no land use regulation through the Zoning Code or the State's ABC/PCN process and just focusing on alcohol. A County Code process requiring a Special Business License for convenience markets would assure local control, and provide for project specific conditioning while utilizing an established revocation process for bad actors. Furthermore, such controls would fulfill the intent of EJ by providing an approach that examines the potentially compounded health effects associated with healthy food access, pollution from auto-related uses, and tobacco/alcohol sales all of which have a nexus to convenience markets.

Although likely to face some opposition from businesses, PER staff's recommendation is that this approach may be superior to the two options currently listed in the public review draft of the EJ Element. A draft implementation measure based on this approach is provided below:

In consultation with residents, businesses, the Sherriff's Department, County Public Health, and other subject matter experts, the County will explore an amendment to the County Code for the purpose of establishing a Special Business License for convenience markets. The purpose is to regulate the nuisance, criminal, and health-related impacts associated with convenience uses, particularly where overconcentration of such uses occur.

***Crime Prevention through Environmental Design (CPTED)
Assessments for Existing Commercial Buildings***

Crime Prevention through Environmental Design (CPTED) is an established crime prevention method that uses the built environment to reduce the incidence and fear of crime. This is achieved through the proper design, maintenance, and use of buildings and the spaces between buildings. CPTED is currently being applied to new buildings in the unincorporated County. The Sheriff's Department assigns staff to Project Review Committee (PRC) meetings to review new development projects and make recommendations based on CPTED principles.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

Applying CPTED during the PRC process mostly benefits new growth areas because these will receive most of the new buildings. In contrast, EJ Communities are largely built out with a limited number of vacant infill parcels (with the exception of North Vineyard and the western portion of North Highlands/Foothill Farms). However, EJ Communities need CPTED the most because these communities usually have most of the crime “hot spots” (areas with high densities of crime) in the unincorporated County in any given year. For example, during the period of November 2016 to November 2017, EJ Communities had four of the five non-business robbery hot spots (areas with high densities of robberies on individuals) that existed in the unincorporated County (Attachment 13).

In response to the above situation, staff proposes that the County consider a program where CPTED assessments are conducted on existing commercial buildings upon the request of business or building owners. There are similar programs in other jurisdictions such as the cities of Menlo Park and Orange. Either the Sheriff’s Department or contractors will conduct the reviews. A small surcharge on business license fees could support this program. If the building is located in an EJ Community, staff recommends that the County reduce building permits and site improvement fees for projects that are responses to CPTED assessments.

Proposed Implementation Measure

PER and the Sheriff’s Department will consider developing a Crime Prevention through Environmental Design (CPTED) assessment program that will be available to business owners and commercial building owners at no cost. This assessment could be supported by a small business license surcharge. For buildings located in EJ Communities, building permit and site improvement fees should be reduced for CPTED improvements that are responses to a CPTED assessment. The program will be advertised by PER through Property Improvement Business Districts and Chambers of Commerce.

Healthy Food Access Section

Food Systems Action Plan

Food insecurity is the limited or uncertain availability of nutritionally adequate and safe foods or the limited or uncertain ability to acquire these foods in socially acceptable ways. Feeding America conducted an annual survey in 2017 to estimate the number of food insecure people and the percentage of the population that experienced food insecurity at some point during a given year in County communities. According to their estimates, food insecurity

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

rates are significantly higher in EJ communities than in non-EJ areas (Attachment 14).

During EJ policy development discussions with EJ Advisory Committee members, some members suggested policies and implementation measures related to reducing food insecurity in EJ Communities that fell outside of the land use purview of the General Plan. Staff determined that a Food Action Plan would be an appropriate document to house these policies. The Food Action Plan will incorporate a holistic review of the countywide food system from production through waste management and will build upon the Food Action Plan for the Sacramento Region. Valley Vision and the Sacramento Region Community Foundation completed this plan in 2015. The County's Plan will have many of the same goals and strategies as the regional plan, but will have additional strategies focusing on the County. The Department of Health Services (DHS) will be the lead agency in preparing the County's Food Action Plan.

Proposed Policy and Implementation Measures

The County supports an equitable and comprehensive approach to food systems from production through processing, distribution, access, and waste management in a way that supports the health, environment, equity, and economy of the region. (Policy) Heal

Develop a Food System Assessment to assess baseline conditions of the County's current food system within two years of adoption of the Phase 2 EJ Element in order to inform the preparation of a Countywide Food Action Plan. (Implementation Plan)

Develop a Countywide Food Action Plan for approval by the Board within two years of completion of the Food System Assessment. (Implementation Measure)

Healthy Food Requirement in Convenience Stores

To reduce rates of food insecurity in EJ Communities, staff proposes an implementation measure to amend the Zoning Code (or County Code if the option described in the off-sale liquor section above is pursued) so that convenience stores in EJ Communities are required to reserve a minimum 15 percent of their shelf space for healthy foods. The implementation measure also includes amending the Zoning Code (or County Code) to include a definition of healthy food products.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

Currently, DHS requests the provision of healthy foods during the PRC process as a condition of approval for convenience store Use Permits. However, there is no ordinance backing up DHS' request for healthy foods. In addition, no standard exists on the minimum amount of healthy foods that convenience stores should provide (just the requirement that two percent of the healthy foods that are provided be displayed in the front of the store). Staff's proposal will provide Zoning Code support for DHS' requests and will provide minimum standards for the provision of healthy foods.

The Zoning Code allows neighborhood convenience stores by right in mixed-use and commercial zones. However, most convenience stores either apply for extended service hours, which require a Use Permit by the Planning Commission, or are associated with an auto service station that requires a Use Permit by the Board. The Use Permit process will enable the County to place the healthy foods minimum shelf space requirement as a condition of approval. If the option of amending the County Code is utilized, then conditions could be added to business license renewals in addition to just new businesses.

Proposed Implementation Measure

Amend the Zoning Code to include a definition of healthy food products and to require all new convenience stores in EJ Communities to dedicate a minimum 15 percent of the shelf space to the sale or display of healthy food products. This requirement shall be added to all new Use Permits and amended Use Permits.

Pollution Exposure Section

Separating Residential Zones from Industrial and Agricultural Zones

Air and noise pollution from stationary and mobile sources in industrial and agricultural areas can negatively affect nearby residential areas where sensitive receptors live. For example, there is one South Sacramento neighborhood sited adjacent to several industrial land uses containing stationary sources of air pollution, large arterial roadways that act as commercial truck routes, and Highway 99. This neighborhood experiences higher levels of diesel particulate matter than in other urban areas in the unincorporated County.

Staff is proposing a countywide policy in the Air Quality Element that will discourage rezones to residential or Use Permits for residential uses when the project area is adjacent to industrial or agricultural zones. The General Plan does have policies to mitigate impacts on residential projects when these are

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

adjacent to industrial or agricultural areas. However, the General Plan does not have policies that discourage residential projects from locating next to industrial or agricultural areas in the first place. If a developer proposes residential uses to be adjacent to industrial or agricultural zones, that developer will be required to implement exposure reduction measures developed in consultation with the Sacramento Metropolitan Air Quality Management District.

Proposed Policy

Residential zones should not be located adjacent to industrial zones (M-1 and M-2) or general agriculture zones (AG-10 to 160). In the event that a residential zone is located adjacent to an industrial or agricultural zone, the developer of the property(ies) being rezoned shall be required to implement exposure reduction measures developed in consultation with the Sacramento Metropolitan Air Quality Management District. (Air Quality Element)

Requiring Use Permits for Child Day Care and Congregate Care Facilities That Are Within 500 Feet of a High Volume Roadway or Active Railroad

In 2003, the State legislature passed SB-352, which prohibits new public schools within 500 feet of high-volume roadways (excess of 50,000 vehicles a day in a rural area and 100,000 vehicles a day in an urban area) unless certain conditions are met. SB-352 was supported by two studies by researchers from the University of Southern California, which concluded that children between ages 10 and 18 have reduced lung function if they attend schools that are within 500 feet of roadways that have more than 100,000 cars per day in urban areas (Gauderman et al., 2007).

Besides children, another vulnerable population to air pollution caused by high-volume roadways are the elderly. The elderly are particularly vulnerable to air pollution because of their weakened immune systems that are the natural result of aging. A recent study showed that long-term exposure to air pollution increases the risk of premature death among those 65 years or older, even when the exposure is below the National Ambient Air Quality Standards (NAAQS) established by the U.S. Environmental Protection Agency (Harvard T.H. Chan School of Public Health, 2017).

For these reasons, staff proposes that child care (not including family day care homes) and congregate care centers be required to attain a Use Permit when they are located within 500 feet of a high-volume roadway. This will enable the County and the Sacramento Air Quality Management District (SMAQMD)

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

to place conditions of approval on a Use Permit, reducing children's and senior's exposure to air pollution. The Zoning Code currently allows child care centers and congregate care centers by right in commercial zones (except BP zone for congregate care centers) and mixed-use zones. This Use Permit requirement will be applicable to the entire unincorporated County.

Because railroads and railyards emit emissions to the level of high-volume roadways, SMAQMD staff has recommended the same restrictions for day care and congregate care centers when these are within 500 feet of an active railroad or railyard. Attachment 15 identifies the high-volume roadways and railroads.

Proposed Implementation Measure

Amend the Zoning Code to require a Conditional Use Permit to the Zoning Administrator for day care centers and congregate care facilities on properties that are within 500 feet of a freeway or other high-volume roadway, a railyard or an active railroad that are identified in Sacramento Metropolitan Air Quality Management District's (SMAQMD) Mobile Sources Air Toxics Protocol Tool or another similar SMAQMD tool. These uses shall incorporate exposure reduction measures consistent with the guidance listed in Air Quality Element policy AQ-3. (Air Quality Element)

Physical Activity Section

Less Stress Bikeways

The General Plan, the Countywide Design Guidelines, and the Zoning Code require many features that increase the safety and enjoyment of pedestrians and bicyclists. However, one concept that has not yet been incorporated into these documents is the concept of "level of traffic stress" (LTS), which evaluates bikeways by matching roadway design, traffic volumes, and speeds with bicyclist level of stress. This concept is gaining currency in the transportation planning field. Implementing LTS would create a less stressful bicycle network that encourages more people to use the network.

Traditionally, bicycle lanes are on major streets because these streets provided the most direct routes to destinations. However, these roadways often have heavy traffic and high speeds, thus, only the most skilled and fearless bicyclists are willing to use the bike lanes. Using the concept of LTS, bike lanes on roadways with the heaviest traffic and highest speeds will have features that reduce the level of stress bicyclists experience while using the roadway. These features could include physical barriers between bicyclists and vehicles or lanes that are separate from the roadway such as a cycle tracks.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

Another alternative is to remove the bike lanes from the major roadways and place the lanes in a parallel route with less traffic volume and speeds. The result will be an increase in bicycle riders because more cyclists who are not skilled and fearless will be willing to use this proposed bike system.

Because the concept of LTS is a best planning practice, rather than applying the concept to just EJ Communities, staff is proposing that the concept of LTS be incorporated into countywide transportation documents such as the Bicycle Master Plan, as well as documents for specific projects such as Complete Street master plans. The recently adopted Fair Oaks Boulevard Complete Streets Master Plan incorporates LTS principles.

Proposed Amended Policy and Implementation Measures

Provide safe, low stress, interesting, and convenient environments for pedestrians and bicyclists, including inviting and adequately-lit streetscapes, networks of trails, paths, and parks and open spaces that connect residences to key destinations, and encourages regular exercise and the reduction of vehicular emissions. (Amended Policy LU-27)

The County Department of Transportation will combine the Bicycle and Pedestrian Master Plans into one comprehensive document. The new document will incorporate the concept of reducing “level of traffic stress” (LTS) for bicyclists and pedestrians. (Implementation Measure)

Evaluate bicycle circulation plans for new master plans and large infill projects using the principles of low stress bicycling. (Implementation Measure)

Apply low stress bicycling principles to Complete Streets Master Plans. (Implementation Measure)

Prioritize Environmental Justice Communities for Smart Growth Street Programs

In the past, the development of roadways focused on providing safe and efficient movement for automobiles while failing to pay equal attention to other modes of travel such as bicycling, walking, and transit. This inequity led to the “Complete Streets” idea, which strives to design and operate streets that enable safe and efficient mobility for all modes of travel.

The General Plan concept of Smart Growth Streets expands upon the complete streets concept. The General Plan defines Smart Growth Streets as “streets that enable safe and efficient mobility and access for all users while positively

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

contributing to the adjacent corridor, surrounding community, and natural environment". The Smart Growth Streets concept is more holistic than the Complete Streets concept in that it takes into account the surrounding environment and adjacent land uses as well as the street itself.

Almost all of the major roadways in EJ Communities developed before the "Complete Streets" idea became popular in transportation planning. The result is that these roadways are very auto-centric, often lacking bike lanes, sufficiently wide sidewalks, transit lanes (for loading and unloading passengers), and landscaping. This streetscape discourages bicycle and pedestrian activity and is probably one of the causes of the higher rates of bicycle/pedestrian collisions with automobiles in EJ Communities than in non-EJ areas (Attachment 16). Staff received many comments at the pop-up booths and community workshops on the lack of bike lanes and sidewalks, particularly from those who live in Arden-Arcade. Other comments stated that there is a need to prioritize EJ Communities for complete streets projects.

In response, staff is proposing an implementation measure that requires that the County Department of Transportation prioritize EJ Communities for Smart Growth Street projects. This means that being located in an EJ Community would be one of the major factors in selecting a roadway for a Smart Growth Street project. This is consistent with the existing EJ objective of prioritizing improvements and programs that address the needs of EJ Communities.

Proposed Implementation Measure

EJ Communities will be prioritized for Smart Growth Streets Programs.

Safe and Sanitary Homes Section

Development Impact Fee Waiver for Low Income Residential Units in Environmental Justice Communities

According to the EJ Element web survey, (see Phase 2 Public Engagement Section) housing affordability is a major issue in all of the EJ Communities. On October 29, 2018, staff met with affordable housing builders to discuss incentives and constraints to the construction of affordable housing. At this meeting, the builders emphasized that waiving development fees is a major incentive to construct more affordable housing.

The County charges development impact fees for all new development. These fees pay for the provision of municipal services such as sewer, water, parks, and libraries. The type and amount of fees vary among different development projects based on their location, size, and/or type of development. Currently,

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

the County waives development impact fees for very low-income units in residential projects in which at least 10 percent of the project's units are affordable to very low-income households. Staff is proposing that another category of affordable residential units be eligible for the development fee waiver. This category is comprised of residential projects in which at least 49 percent of the project's units are affordable to low-income households. The waiver will only be applicable to residential projects that are in EJ Communities.

The implementation of the waiver will result in the loss of revenue for agencies that provide municipal services. However, there is a potential funding source for reimbursing these agencies. The State legislature passed Senate Bill 2 (SB-2) ("New Affordable Housing and Job Acts Fee") in 2017, which created a permanent funding source for affordable housing through a new real estate fee. The State will eventually allocate money from this source to local jurisdictions based on a formula. Thus, the County could use a portion of its allocated SB-2 money for reimbursing agencies that are impacted by the proposed fee waiver.

Proposed Policy and Implementation Measures

The County will support the provision of affordable housing in EJ Communities. (Policy)

The County will issue development impact fee waivers for affordable units in residential developments in EJ Communities in which at least 10 percent of the total units are affordable to very low-income households, or at least 49 percent are affordable to low-income households and on which affordability restrictions are subject to long-term (30 years or greater) regulatory agreements as certified by SHRA. (Implementation Measure)

PROPOSED AMENDMENTS TO OTHER GENERAL PLAN ELEMENTS

In addition to amendments to the Phase 1 EJ Element, staff is proposing to amend policies and implementation measures in other General Plan elements (Attachment 17) as part of the Phase 2 EJ Element project. Amendments fall into the following categories:

- Moving existing policies and implementation measures into the EJ Element.
- Adding new policies and implementation measures to other General Plan elements.
- Changing existing policies and implementation measures and keeping these in their current General Plan element.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

- Moving existing policies and implementation measures from one General Plan element to another.

Moving Existing Policies and Implementation Measures into the EJ Element

Staff has determined that existing policies and implementation measures related to topics that are unique to EJ should be moved to the EJ Element. Topics unique to EJ are civic engagement, healthy food access, crime prevention, and physical activity. Existing policies and implementation measures that will be moved to the EJ Element include:

- Housing Element policies (HE 7.1.5, HE 7.1.7, HE 7.1.8) and implementation measures (G3, G6, G7) related to healthy food access and crime prevention through environmental design (CPTED). These policies and implementation measures are in the Housing Element because there was no other appropriate element to house them. Staff is proposing to move these policies and implementation measures to the Healthy Food Access and Crime Prevention Sections of the EJ Element. Proposed changes to the Housing Element will be deferred until the next Housing Element update.
- Public Facilities Element policy PF-53 and implementation measures (A, B and C of the Design Neighborhoods for Crime Prevention Section) on CPTED. These will be moved to the Crime Prevention Section of the EJ Element.
- Land Use Element policy LU-26, which requires community design that encourages physical activity in new and existing developments. This policy will be moved to the Physical Activity Section of the EJ Element.
- Economic Development Element ED-13, which prioritizes areas in need of revitalization for County employment centers and facilities. This policy will be moved to the Crime Prevention Section of the EJ Element and be amended to replace "areas in need of revitalization" with "EJ Communities".

Adding New Policies and Implementation Measures to other General Plan Elements

Staff has determined that proposed countywide policies and implementation measures related to topics covered in other General Plan elements (pollution exposure, promoting public facilities, and safe and sanitary homes) will be added to the relevant General Plan element. Proposed policies and implementation measures that will be in other General Plan elements include:

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

- Policy that requires land uses with sensitive receptors that are within 500 feet of a high-volume roadway, railyard, or active railroad incorporate exposure reduction measures. This policy will be added to the Multidisciplinary Coordination Section of the Air Quality Element.
- Implementation Measure that requires Conditional Use Permits for child care centers and congregate care facilities that are within 500 feet of a high-volume roadway, railyard, or active railroad. This implementation measure will be added to the Multidisciplinary Coordination Section of the Air Quality Element.

Changing Existing Policies and Implementation Measures and Keeping These in Their Current General Plan Element

There are existing policies (AQ-3, HE 3.3.1, HE 7.1.6, LU-19, LU-68, PF-32) that will be amended and will remain in their current General Plan Elements. Like those in the previous category, these are countywide policies and implementation measures related to topics covered in other General Plan elements. Many of the amendments update the language of the policy or implementation measure while other amendments add a reference to EJ Communities. Amendments to Housing Element policies will be deferred until the next Housing Element update.

Moving Existing Policies and Implementation Measures from One General Plan Element to Another (Other than the EJ Element)

The Agriculture Element has an implementation measure (Implementation Measure C of the Urban Encroachment Section) requiring developing guidelines for the design of buffers between agricultural and residential uses, but does not include developing guidelines for buffers between industrial and residential uses. Because there is a lack of comprehensive guidelines for buffers between potentially conflicting land uses in the General Plan and Zoning Code, staff proposes an implementation measure in the Air Quality Element that requires developing guidelines for buffers between industrial and residential uses as well as agricultural and residential uses. Existing implementation Measure C of the Agriculture Element will be incorporated into this new implementation measure (Proposed Implementation Measure F of the Air Quality Element's Multidisciplinary Section).

PROPOSED POLICIES AND IMPLEMENTATION MEASURES BY ADVISORY COMMITTEE MEMBERS

Staff did not ultimately carry forward some of the proposed policies and implementation measures advanced by the Advisory Committee. Table 1 lists these proposals with staff's reasoning.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

Table 1: EJ Element Advisory Committees Proposals Not Supported by Staff

Proposed Policy/Implementation Measure	Reasoning for Not Advancing
Expand low-income supplemental food access through support of local hunger-relief organizations such as existing local food bank networks. (Proposed Policy)	Could be part of the proposed Food Action Plan instead.
In order to encourage Urban Agriculture in the County, the County shall waive water connection fees, where it has authority to do so, or pay for the hookup fee, for properties using the Urban Agriculture Incentive Zone Ordinance. (Proposed Implementation Measure)	The County Water Agency does not include EJ Communities within its service area with the exception of North Vineyard. North Vineyard is predominantly agricultural but the Urban Agriculture Incentive Zone Ordinance focuses on urban areas.
Develop and adopt a food policy and procurement program that incorporates Good Food Purchasing policies for food in cafeteria services, the County jail, and County-sponsored events. (Proposed Implementation Measure)	Could be part of the proposed Food Action Plan instead.

REMOVING/ADDING ENVIRONMENTAL JUSTICE COMMUNITIES, AMENDING BOUNDARIES OF ENVIRONMENTAL JUSTICE COMMUNITIES

Because conditions addressed by the EJ Element may change over time, staff proposes that the EJ Element be updated every eight years and be on the same update track as the Housing Element. Staff has also developed criteria for adding or removing EJ Communities and amending EJ Community boundaries (Attachment 18).

IMPLEMENTATION OF THE EJ ELEMENT

Implementation Pathways

An important issue for the EJ Element project is determining the most effective ways to implement the EJ Element. There are two pathways to

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

implementation. The first is implementation of measures that will be included in the Phase 2 EJ Element. Many of these implementation measures are the result of baseline research and comments received during the project's public engagement process. The second part of implementation is a systems approach comprised of changes to the regular processes and practices of the County that will result in the implementation of EJ. Though not specifically listed in the EJ Element, these changes will be consistent with the EJ Element policies of maximizing public engagement opportunities and prioritizing improvements and programs that address the needs of EJ Communities. An example of this is educating PER planners and County Executive Office (CEO) analysts on EJ so they will look at projects through the lens of EJ.

Some County departments, such as the Probation Department and Voter Registration and Elections, have already incorporated aspects of EJ into their regular department activities. Implementation will include learning from these department's best practices and expanding them to countywide operations where appropriate.

Annual Implementation Organization and Process

There has been internal discussion among staff and discussion between staff and the Advisory Committee on the most effective organizational structure and processes for consistently implementing EJ Element measures and embedding EJ into regular County practices. Some of the ideas that were brought forward included having an EJ Coordinator, an internal implementation committee, a stakeholder committee, and allocating a certain percentage of a PER staff position to implementation activities. Taking into account staff and resource limitations (for the current and subsequent fiscal years) staff recommends an EJ Element implementation program with the following components:

- **Annual Stakeholder Meeting on EJ Element Implementation:** This meeting will provide a formal opportunity for stakeholders to provide input on implementation priorities. At this meeting, staff will provide a progress report on EJ Element implementation and will receive comments on implementation priorities for the following year. Comments received at this meeting will inform implementation decisions and resource commitments by the Executive Level Working Group and PER Long Range Planning Section (see below). Because comments at the stakeholder meeting will influence EJ Element implementation for the next year, staff is anticipating that this meeting will occur before the presentation of the General Plan Annual Report to the Planning Commission and the Board.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

- Executive Level Working Group: This will include one of the existing County Executive’s working groups consisting of department heads. Based on stakeholder input at the Annual Stakeholder Meeting, the Executive Working Group will prioritize major implementation measures and determine which measures may be identified for recommendation to the Board for allocation of resources during the annual budget process. These will include measures that involve multiple departments. This group will also determine ways to embed EJ into the County’s regular processes and practices.
- PER Long Range Planning Section: The purpose of the Long Range Planning Section is to implement the General Plan, which includes the EJ Element. Management for this section will determine EJ Element implementation priorities and resource allocations based on stakeholder input at the Annual Stakeholder Meeting and available PER resources. The Long Range Planning section will implement measures that are the sole responsibility of PER and will provide staff to work on major and/or multidepartment implementation measures supported by the Executive Level Working Group.
- Report Card on EJ Element Implementation (General Plan Annual Report): PER Long Range Planning staff will track EJ Element implementation as they do for other General Plan Elements and will create a “report card” that will document EJ Element implementation for the previous calendar year. This “report card” will be part of the General Plan Annual Report and will be made available to the public at PER’s website.
- Educating County Departments on EJ: The PER Long Range Planning Section will lead the effort to educate CEO analysts, department heads and high-level managers on EJ in order to assist them in embedding EJ in their department’s processes and practices. PER staff is also anticipating providing training on EJ to the Community Planning Advisory Councils (CPACs).

CPAC REVIEW AND HUB ORGANIZATION REVIEW

CPAC Review and Comments

Staff presented the draft General Plan amendment package for the Phase 2 EJ Element to the CPACs that represent EJ Communities. Table 2 lists the CPACs, the meeting dates and resulting votes.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

Table 2: CPAC Meetings and Voting Results

CPAC	Date	Vote
Arden-Arcade	September 26, 2019	Recommend for Approval (4-3)
Carmichael/Old Foothill Farms	August 21, 2019	Recommend for Denial (4-3)
North Highlands/Foothill Farms	August 27, 2019	Recommend for Approval (4-0)
South Sacramento	September 18, 2019	Recommend for Approval (4-0)
Vineyard	September 3, 2019	Recommend for Approval (4-2)

Four of the five CPACs voted to recommend approval of the general plan amendments package. Some of the comments from CPAC members are described below:

- Arden-Arcade CPAC Member: Requiring minimum shelf space for healthy foods could affect viability of small businesses.
- Arden-Arcade CPAC Member: Desire to ensure no adverse effects related to cost or timeliness associated with processing development applications as a result of EJ policies and implementation.
- South Sacramento CPAC Member: There should be training on EJ for the CPACs.
- Vineyard CPAC Member: There needs to be indicators to determine the effectiveness of the EJ Element policies and implementation measures. Vineyard CPAC Member: There are going to be fiscal impacts on certain communities and industry groups as the County implements EJ policies. EJ Element implementation would deny certain programs and improvements to non-EJ areas.

The Carmichael/Old Foothill Farms CPAC voted to recommend denial (4-3) on the basis that the proposed policies and implementation measures needed to be stronger and more binding on the County. One member stated that a more comprehensive approach to implementation was needed while another member stated that the EJ Element should have higher implementation priority over other General Plan Elements.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

Hub Organization Comments

Staff notified the hub organizations of the CPAC meetings and gave these organizations the option to have staff present the project at one of their own meetings. Staff met with the Black Child Legacy on August 22, 2019, and Sacramento ACT on September 9, 2019. Comments received at these meetings are described below:

- Black Child Legacy Staff: Prices for required fresh produce at convenience stores might not be affordable to lower income households.
- Sacramento ACT Member: In addition to the annual stakeholder meeting, there needs to be report back sessions with stakeholders throughout the year.
- Sacramento ACT Member: Pollution exposure measures need to be applied to existing development as well as new.

FINDINGS

Recommended Findings: staff's recommendations are based upon the following considerations:

1. The request will enable the County to meet the requirements of SB 1000, the *Planning for Healthy Communities Act* (approved in 2016) incorporated into Government Code Section 65302(h) that requires cities and counties with disadvantaged communities to incorporate EJ policies into their general plans.
2. The General Plan Amendment Package that includes the Phase 2 EJ Element incorporates EJ objectives and policies into the General Plan in compliance with the State mandate.
3. The General Plan Amendment Package that includes the Phase 2 EJ Element will add additional policies and implementation measures that are the result of baseline research and extensive public outreach. Conducting additional outreach is consistent with State Office of Planning and Research (OPR) guidelines on SB 1000.

PLNP2018-00119. Phase 2 Environmental Justice General Plan Amendment Package

Attachments

- RES Planning Commission General Plan Amendment Resolution
 - EXH A – Amendments to the Environmental Justice Element
 - EXH B – Amendments to the Agricultural Element
 - EXH C – Amendments to the Air Quality Element
 - EXH D – Amendments to the Economic Development Element
 - EXH E – Amendments to the Land Use Element
 - EXH F – Amendments to the Public Facilities Element
 - ATT 1 Environmental Justice Communities
 - ATT 2 Supporting Research Document
 - ATT 3 Phase 2 Environmental Justice Element
 - ATT 4 Comprehensive List of Proposed Policies/Implementation Measures
 - ATT 5 Pop-up Booth Survey Responses
 - ATT 6 Summaries of Web Survey Responses
 - ATT 7 Most Common Web Survey Responses
 - ATT 8 Community Workshop Comments
 - ATT 9 Sacramento ACT and Stephens Foundation Comments
 - ATT 10 Public Outreach and Policy Development
 - ATT 11 Percent Limited English Speaking Households
 - ATT 12 Convenience Stores – Liquor Stores
 - ATT 13 Robbery Hot Spots
 - ATT 14 Food Insecurity Rates
 - ATT 15 High Traffic Volume Roadways – Active Railroads
 - ATT 16 Bike and Pedestrian Collision Occurrences
 - ATT 17 Proposed Amendments to Other General Plan Elements
 - ATT 18 Changing EJ Community Status and Boundaries
 - ATT 19 References
- ENV DOC Notice of Exemption

ATTACHMENT DISPOSITION TABLE

This table is intended to reference changes between Planning Commission Report Attachments and Board of Supervisors Report Attachments.

Board Report Attachment No.	Attachment Title	Planning Commission Report Attachment No.
RES	Resolution to Amend the General Plan EXH A – Amendments to the Environmental Justice Element EXH B – Amendments to the Supporting Research Document EXH C – Amendments to the Agricultural Element EXH D – Amendments to the Air Quality Element EXH E – Amendments to the Economic Development Element EXH F – Amendments to the Land Use Element EXH G – Amendments to the Public Facilities Element	N/A
ATT 1	Environmental Justice Communities	ATT 1
ATT 2	Planning Commission Staff Report	N/A
ATT 3	Proposed Amendments to Other General Plan Elements	ATT 17
ATT 4	Listing of Proposed Phase 2 EJ Element Policies and Measures	ATT 4
ATT 5	Listing and Chronology of Outreach	N/A
ATT 6	Comments Received at CPAC Meetings and Hub Organization Meetings	N/A
ATT 7	Planning Commission Transmittal and Resolution	N/A
ATT 8	Public Draft 1 to 2 Redline Version EJ Document	N/A
ATT 9	Comments Received At November 7, 2019 Community Meeting	N/A

ATT 10	Changing Environmental Justice Community Status and Boundaries	ATT 18
ENV DOC	Notice of Exemption	ENV DOC
N/A	These attachments contain excerpts from the Phase 2 EJ Element and Supporting Research Document.	ATT 5-16, 19