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October 16, 2020

Via E-mail

Verny Carvajal
Principal Planner
City of Santa Ana
20 Civic Center Plaza
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vcarvajal@santa-ana.org

RE: City of Santa Ana Draft General Plan Update

Dear Mr. Carvajal:

It is our understanding that the City of Santa Ana is currently drafting environmental justice policies for its General Plan pursuant to Senate Bill 1000 ("SB 1000"). We recognize the difficulties facing the City of Santa Ana and its communities during the current public health crisis caused by COVID-19. The California Department of Justice's Bureau of Environmental Justice would like to serve as a resource for the City of Santa Ana as it updates its General Plan during this difficult time. Therefore, we are writing to provide information on SB 1000, our initial feedback on the City's plans for its General Plan Update, and resources for engaging with community members and developing environmental justice policies.¹

I. Background on Environmental Justice and SB 1000

Low-income communities and communities of color often bear a disproportionate burden of pollution and associated health risks when compared to their more affluent neighbors. Similar to health risks that are connected to pollution exposures, evidence shows that the risks associated with COVID-19 are inequitably distributed among community members.² Further, recent studies

¹ The Attorney General submits these comments pursuant to his independent power and duty to protect the environment and natural resources of California. See Cal. Const., art. V, § 13; Gov. Code §§ 12511, 12600-12612; *D'Amico v. Board of Medical Examiners* (1974) 11 Cal.3d 1, 1415.

² See e.g., "Younger blacks and Latinos are dying of COVID-19 at higher rates in California, *Los Angeles Times* (April 15, 2020), <https://www.latimes.com/california/story/2020-04-25/coronavirus-takes-a-larger-toll-on-younger-african-americans-and-latinos-in-california>

indicate that exposures to industrial pollution significantly increase the likelihood of suffering serious health consequences, including death, from the COVID-19 virus.³

Environmental justice can address some of the longstanding disparate impacts in a community, and is defined as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adopting, implementation, and enforcement of environmental laws, regulations, and policies.” (Gov. Code, § 65040.12, subd. (e)(1).) California law further states that environmental justice includes, but is not limited to:

- (1) the availability of a healthy environment for all people;
- (2) the deterrence, reduction, and elimination of pollution burdens for communities disproportionately experiencing the adverse effects of that pollution;
- (3) governmental entities engaging and providing technical assistance to communities most impacted by pollution to promote their meaningful participation in all phases of the environmental and land use decision-making process; and
- (4) at a minimum, the meaningful consideration of recommendations from communities most impacted by pollution into environmental and land use decisions.

(Gov. Code, § 65040.12, subd. (e)(2).)

In 2016, the California Legislature passed SB 1000 to incorporate environmental justice into the local land use planning process. SB 1000 requires local governments to address pollution and other hazards that disproportionately impact low-income communities and communities of color in their jurisdiction. The law intends to make environmental justice a real and vital part of the planning process by encouraging transparency and public engagement during all stages of a general plan update, requiring local governments to identify environmental justice issues in their communities, and ensuring that local governments adopt environmental justice policies that address the specific needs of disadvantaged communities.

II. Legal Requirements of SB 1000

If a local government adopts or updates two or more elements of its general plan after January 1, 2018, SB 1000 requires the local government to identify any “disadvantaged communities” within its planning area. (Gov. Code, § 65302, subds. (h)(1)-(2).) This identification must be done in the general plan itself. (Gov. Code, § 65302, subd. (h)(1).) SB 1000’s definition for “disadvantaged communities” includes two identification methods: (1) “an

³ Wu & Nethery, “Exposure to Air Pollution and COVID-19 Mortality in the United States,” Dept. of Biostatistics, Harvard T.H. Chan School of Public Health, <https://www.medrxiv.org/content/10.1101/2020.04.05.20054502v2.full.pdf>; E&E News, “Study Links Higher NO2 Levels to More Coronavirus Deaths,” (April 23, 2020), <https://www.eenews.net/eenewspm/2020/04/23/stories/1062953127>; “New Research Links Air Pollution to Higher Coronavirus Death Rates,” *New York Times* (April 7, 2020), <https://www.nytimes.com/2020/04/07/climate/air-pollution-coronavirus-covid.html>.

area identified by the California Environmental Protection Agency (CalEPA) pursuant to Section 39711 of the Health and Safety Code”; or (2) “an area that is 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, subd. (h)(4)(A).)

Under the first method for identifying disadvantaged communities, an area is a disadvantaged community if it scores at or above 75 percent on CalEPA’s California Communities Environmental Health Screening Tool (“CalEnviroScreen”).⁴ The CalEnviroScreen tool and additional information regarding how it works are available on CalEPA’s website.⁵ Generally speaking, CalEnviroScreen identifies the communities in California that are burdened by multiple sources of pollution and most vulnerable to its effects, taking into account the socioeconomic status and health conditions of people living in these communities. Every census tract in California is ranked by combining the scores for 21 different indicators that relate to pollution burdens and population characteristics. The census tracts that score the highest are the most burdened and most vulnerable to pollution in California.

The second identification method requires a local government to first determine whether low-income areas exist in its jurisdiction. SB 1000 defines a “low-income area” as (1) “an area with household incomes at or below 80 percent of the statewide median income,” or (2) an area with “household incomes at or below the threshold designated as low income by the Department of Housing and Community Development’s (HCD) list of state income limits adopted pursuant to Section 50093 of the Health and Safety Code.” (Gov. Code, § 65302, subd. (h)(4)(c).) After identifying low-income areas, a local government must then evaluate if these areas are disproportionately affected by environmental pollution that can lead to negative health impacts, pollution exposures, or environmental degradation. (Gov. Code, § 65302, subd. (h)(4)(a).) There are various data sets that can be used for the second part of this analysis, including CalEnviroScreen, that contain specific information about pollution sources.

If a local government identifies one or more disadvantaged communities in its planning area, its general plan must have either an “environmental justice element” or “related goals, policies, and objectives integrated in other elements” (collectively, “EJ policies”) that address eight different topics. (Gov. Code, § 65302, subd. (h)(1).) A general plan’s EJ policies must “reduce the unique or compounded health risks in disadvantaged communities” by doing at least the following:

- (1) Reduce pollution exposure;

⁴ For a map of all disadvantaged communities in CalEnviroScreen, *see* CalEPA, Designation of Disadvantaged Communities, <https://oehha.ca.gov/calenviroscreen/sb535>

⁵ CalEPA and Office of Health Hazard Assessment (“OEHHA”), CalEnviroScreen 3.0, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>; CalEPA and OEHHA, CalEnviroScreen 3.0 Report (Jan. 2017), <https://oehha.ca.gov/media/downloads/calenviroscreen/report/ces3report.pdf>.

- (2) Improve air quality;
- (3) Promote facilities (SB 1000 defines “public facilities” as facilities that include “public improvements, public services, and community amenities.” (Gov. Code, § 65302, subd. (h)(4)(B));
- (4) Promote food access;
- (5) Promote safe and sanitary homes; and
- (6) Promote physical activity.

(Gov. Code, § 65302, subd. (h)(1)(a).) SB 1000 also requires EJ policies that “promote public engagement in the public decisionmaking process” and “prioritize improvements and programs that address the needs of disadvantaged communities.” (Gov. Code, § 65302, subds. (h)(1)(b)-(c).)

III. City of Santa Ana’s General Plan Update

A. Drafting Tailored EJ Policies

As described above, local governments that identify disadvantaged communities in their jurisdiction must include EJ policies in their general plan that address specific issues. (Gov. Code, § 65302, subd. (h)(1).) SB 1000 requires these policies to be either incorporated into General Plans as a separate EJ element or integrated into other elements throughout the Plan. (Gov. Code § 65302, subd. (h)(1).) The City has chosen the latter alternative. We appreciate the City’s efforts to address environmental justice in its General Plan through inclusion of EJ policies. However, we are concerned that the EJ policies are not sufficient to reduce the unique and compounded health risks to EJ communities as required by SB 1000, nor do they adequately address the specific requirements of SB 1000.

The City’s EJ policies should match the pollution burdens and unique needs of the disadvantaged communities in its jurisdiction. According to CalEnviroScreen, there are 17 census tracts in the City of Santa Ana that are designated as disadvantaged communities. For example, the highest ranking census tract in the City ranks worse than 97 percent of the rest of the state for pollution burden and worse than 67 percent for population vulnerability. This census tract is in the 100th percentile for toxic releases, 99th percentile for cleanups, 98th percentile for groundwater threats, 95th percentile for traffic pollution, and 95th percentile for hazardous waste. Not only are these communities exposed to more pollution, they are also some of the most vulnerable communities of color in the state. For example, in the worst ranking census tract under the CalEnviroScreen, 76 percent of the community identifies as Latinx and 10 percent identifies as Asian American. They are also relatively low-income with approximately 60 percent of the population with incomes less than to two times the federal poverty level. These communities are undeniably disadvantaged and continue to suffer from environmental racism.

To its credit, the City has conducted a detailed assessment of health risks in Santa Ana in the Environmental Justice Background and Analysis (“EJ Background Report”) for the General Plan Update. For example, the EJ Background report identifies communities in east and south

Santa Ana, including the neighborhoods of Delhi, Cedar Evergreen, Cornerstone Village, Lyon St., Madison Park, and Memorial Park, that suffer from pollution exposure in the form of groundwater threats. Thus, the City's EJ policies should include specific commitments to address the top pollution burdens identified in CalEnviroScreen and in the EJ Background report, including pollution related to toxic releases, groundwater threats, and hazardous waste.

Further, although not identified in the CalEnviroScreen nor in the EJ Background report, our Office understands that disadvantaged communities in Santa Ana are significantly impacted by lead contamination.⁶ We commend the City for including two implementation actions in its most recent draft General aimed at addressing lead contamination. However, we recommend the City consider strengthening these measures and add additional measures to address lead contamination. Action 2.4 in the Safety Element states that the City will "[w]ork with community organizations and regional partners to understand the prevalence, sources, and implications of lead contamination across Santa Ana's soil," and to "[c]ollaborate with environmental justice stakeholders in proposing solutions to remove hazardous lead soils in the city." Similarly, Action 3.6 in the Land Use Element states that the City will "[c]oordinate with the County of Orange Health Care Agency to establish and maintain a program to eliminate lead-based paint hazards, with priority given to residential buildings located within environmental justice area boundaries." Because these measures lack specific information about how community organizations and stakeholders will be identified, the timeline for implementation of these programs, and benchmarks that the City has set to ensure implementation, it is unclear how the community can be involved in the programs and track the effectiveness of these measures. In addition, the City should consider additional measures focused on addressing lead contamination. As an example, the City of Richmond adopted a series of policies to address toxic and hazardous waste in their Community Health and Wellness Element that could provide a model for Santa Ana to use to address lead contamination. In particular, Policy HL-40 requires the City to ensure that contaminated sites are adequately remediated before allowing new development and to develop a response plan to address existing contaminated sites in the City. This policy also requires the City to develop guidelines for convening an oversight committee with community representation to advise and oversee toxic site cleanup and remediation. Further, Action HW9.K requires the City adopt standards for the safe management of hazardous substances, including standards that require soil testing at development sites where contamination is suspected. Finally, a particular resource available to the City in developing policies to address lead contamination is the impacted communities themselves. We recommend

⁶ S. Masri et al., *Social and spatial distribution of soil lead concentrations in the City of Santa Ana, California: Implications for health inequities*, 743 SCI. OF THE TOTAL ENV'T (2020), available at <https://doi.org/10.1016/j.scitotenv.2020.140764>; "Low-income and predominately Latino neighborhoods in Santa Ana affected by toxic lead, report says," *L.A. Times* (September 10, 2020), <https://www.latimes.com/socal/daily-pilot/entertainment/story/2020-09-10/low-income-and-predominately-latino-neighborhoods-in-santa-ana-affected-by-toxic-lead-report-says>; "The hidden toxic threat in America's backyards," *Think Progress* (July 12, 2017), <https://thinkprogress.org/the-hidden-toxic-threat-in-americas-backyards-aa580bbf61e1/>

that the City consult with disadvantaged communities in its jurisdiction to solicit ideas on how to address the pollution burdens related to lead contamination.⁷

Moreover, the General Plan contains several policies that attempt to address exposure to pollution as identified in the CalEnviroScreen, but many do not appear designed to affirmatively reduce the unique and compounded health risks and pollution burdens facing environmental justice communities as required by SB 1000. For instance, Policy CN-1.5 states that the City should “[c]onsider potential impacts of stationary and non-stationary emission sources on existing and proposed sensitive uses and opportunities to minimize health and safety risks” and “[a]pply special considerations and regulations on the siting of facilities that might significantly increase pollution near sensitive receptors within environmental justice area boundaries.” However, the Policy does not identify what types of regulations would be applied to facilities and does not provide conditions or thresholds that would trigger when such regulations would be applied. There also appears to be nothing in the Policy requiring implementation of identified regulations to reduce pollution exposure, or defining the types of pollution and identifying the timeframe for implementing such regulations.

Further, several policies encourage the City to develop buffers between industrial uses and sensitive receptors. This is a positive step, but it is of questionable efficacy because the policies do not go on to designate appropriate distances or standards for buffer zones. This concern is exemplified by Policy LU-3.8, which states that the City should “[a]void the development of sensitive receptors in close proximity to land uses that pose a hazard to human health and safety, due to the quantity, concentration, or physical or chemical characteristics of the hazardous materials that they utilize, or the hazardous waste that they generate or emit.” Similarly, Policy LU-3.11 states that the City should “[p]romote landscaping and other buffers to separate existing sensitive uses from rail lines, heavy industrial facilities, and other emissions sources.” However, such policies do not identify what is considered “in close proximity” or any standards for determining when a buffer should be established or even what an appropriate buffer is. We recommend the City define these requirements more clearly and consider establishing affirmative requirements for separation between industrial uses and sensitive receptors in the City’s disadvantaged communities. CARB suggests that sensitive land uses be separated from industrial uses by at least 1,000 feet. Indeed, data from CARB demonstrates that localized air pollution drops off by 80 percent about 1,000 feet away. Thus, the City should consider establishing at least 1,000 feet separation between industrial uses and sensitive receptors to adequately protect communities.

We also recommend the City consider additional enforceable policies that would adequately reduce pollution burdens experienced by the identified environmental justice communities. There are many examples of EJ policies from other local governments that the City can reference as it develops its own policies. OPR’s General Plan Guidelines includes a collection of example EJ policies from adopted general plans that address various environmental

⁷ See e.g., Orange County Environmental Justice Letter to City of Santa Ana (July 13, 2020).

justice challenges.⁸ As an example, to address groundwater contamination, Marin County implemented several policies designed to improve water quality, including a groundwater monitoring program for unincorporated areas (Action WR-2.0) and a requirement that all County facilities use the least toxic pest control methods (Action WR-2.n). Moreover, in a recently adopted general plan not included in OPR’s General Plan Guidelines the City of Placentia adopted strong EJ policies that could also serve as a model for the City.⁹ Placentia’s Environmental Justice Element provides nuanced discussions of specific disadvantaged communities in Placentia’s jurisdiction, identifies strong and unique EJ policies to address the needs of these communities, and commits to prioritizing environmental justice-related program.¹⁰

Other policies intended to address the requirements of SB 1000 can also be strengthened to reduce the health risks experienced by the identified environmental justice communities. For example, Policy HE-3.2 states that the City will “[c]ontinue to support the creation of healthy neighborhoods by addressing public safety, improving the built environment, and maintaining building code standards.” However, the policy does not identify how such public safety issues will be identified and addressed. Similarly, Policy CM-1.2 does not seem like it fully ensures that community members will be adequately engaged. Policy CM-1.2 states that the City will “[e]ngage residents and community facility users to provide input for facility improvements and programming.” This would be a laudable course of action, but the policy does not provide a method for engagement or a timeline for engagement, making it unenforceable.

In sum, we encourage the City to strengthen the City’s EJ policies and supplement with new policies designed to reduce the risks already identified in the EJ Background report. We recommend the City review resources prepared by OPR and the California Air Resources Board.¹¹ We also encourage the City to consider identifying in some way all EJ policies in the General Plan, for example by color coding or copying them into an appendix. We believe such identification is a best practice for ensuring the City’s EJ policies are clear and accessible.

B. Timeline for Developing and Adopting the General Plan Update and Community Engagement Process

The City of Santa Ana released a Draft Environmental Impact Report (DEIR) and draft General Plan Update in August 2020. The City subsequently released a second draft of the General Plan Update on September 28, 2020. The staff anticipates the hearing process for the General Plan and the Final Environmental Impact Report (FEIR) to begin in October 2020, with

⁸ “Model Environmental Justice Policies for General Plans,” *Office of Planning and Research* (June 2020), [https://opr.ca.gov/docs/20200624-Model EJ Policies for General Plans.pdf](https://opr.ca.gov/docs/20200624-Model_EJ_Policies_for_General_Plans.pdf).

⁹ “General Plan Update,” *Placentia*, <https://www.placentia.org/166/General-Plan-Update>.

¹⁰ *Id.* at 10-8 to 10-15, 10-32 to 10-49.

¹¹ “General Plan Guidelines Chapter 4, Section 8,” *Office of Planning and Research* (June 2020), [https://opr.ca.gov/docs/20200706-GPG Chapter 4 EJ.pdf](https://opr.ca.gov/docs/20200706-GPG_Chapter_4_EJ.pdf); CARB, Options for Cities to Mitigate Heavy-duty Vehicle Idling (May 5, 2016), https://ww3.arb.ca.gov/enf/arb_options_cities_mitigate_idling.pdf.

adoption in late 2020. We understand and support the City's desire to continue the important work of updating its General Plan during the pandemic, but we are concerned that the City's goal to adopt the General Plan update by the end of this year may be unrealistic, especially when in-person meetings may not be feasible or safe. One of the basic purposes of SB 1000 is to provide environmental justice communities with a meaningful opportunity to engage in government decisions that affect them. The City's accelerated timeline does not appear to allow for this meaningful community engagement process to occur.

The City began its General Plan update process in 2016. However, it is our understanding that the City's strategy for engagement with environmental justice communities began three months prior to the release of the draft General Plan Update and DEIR. While we applaud the City's various initiatives to reach out to environmental justice communities, we are concerned that the City has not allowed enough time or opportunity for community engagement since releasing the draft General Plan Update. These concerns are more pronounced because all of the City's outreach to environmental justice communities has occurred during the COVID-19 pandemic. There are several ways that the City can improve its strategy for engaging with community members. The City could prepare an online survey to determine the top environmental justice-related priorities in the identified environmental justice communities. It City could also partner with organizers from local environmental justice groups to identify the most effective ways to communicate with residents of disadvantaged communities that may lack access to the internet. Finally, the City might form an environmental justice advisory committee to evaluate the needs of environmental justice communities in Santa Ana and draft the City's EJ policies.

We recognize that robust community engagement will be difficult for the City to conduct when social distancing is still the norm. Thus, we urge the City to not rush through its General Plan Update before the City has opportunities to fully engage with the historically disadvantaged communities in its jurisdiction.

IV. Conclusion

Thank you for considering our suggestions for strong community engagement and environmental justice policies in the City's General Plan Update. To supplement the resources described above and the information the City collects from community members, we encourage the City to visit the Attorney General's SB 1000 website to identify tools and data sources that may be relevant to the City's specific needs and circumstances.¹² Please do not hesitate to reach out to me if you have any questions throughout the remainder of your planning process. We look forward to serving as a resource for the City as it continues its General Plan Update.

¹² "SB 1000 -- Environmental Justice in Local Land Use Planning," *State of California Department of Justice*, <https://oag.ca.gov/environment/sb1000>.)

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Sincerely,

A handwritten signature in black ink, appearing to read 'R. Garcia', with a horizontal line extending from the end.

RICA V. GARCIA
Deputy Attorney General

For XAVIER BECERRA
Attorney General

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October 30, 2020

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RE: City of Santa Ana Draft General Plan Update

Dear Ms. Garcia:

Thank you for the information and guidance regarding SB 1000 and the feedback provided on the City's comprehensive update to the General Plan. City staff has reviewed the comments and feedback from the Attorney General (AG) and the exemplars referenced in the letter. The City believes that the draft General Plan through the Five Core Values are a direct reflection and the City's response to the environmental, social, and economic issues facing our residents. The levels of commitment and clarity of the draft policies and implementation actions contained within the draft Plan are in line to those of the communities and examples pointed out in the Attorney General's letter to the City. With this understanding, the City will continue our dialogue with the community and efforts on refining the draft policies and implementation measures to promote environmental equity and address existing environmental concerns and inequalities.

How It Began

On March 18, 2014, the City Council adopted the first [5-year strategic plan](#) (Attachment 1). This plan was updated in 2020. The adoption of the 2014 plan marked a major milestone for the city and the community. The Strategic Plan provides a clear statement of where the city is going and how it intends to get there. It includes a vision, a description of the mission of the organization, a set of guiding principles (values) to guide actions, a

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set of multi-year goals that guide decisions, objectives and strategies for each goal, and a plan for implementation and accountability.

The vision of the strategic plan is for the City to be the dynamic center of Orange County which is acclaimed for *investment in a **safe and healthy community, youth, neighborhood pride, enriched and diverse culture, quality government services and thriving economic climate***. The comprehensive update of the City's existing General Plan was identified as a key outcome of this plan.

City staff commenced work on a comprehensive update to the General Plan beginning in late 2015 under the guiding principal that this Plan will be one that **reflects the values and the voice of the community**. Throughout 2016 and 2018, the City reached out, listened to, and collaborated with city residents, local community and civic leaders, civic and service organizations, youth and senior representatives, the business community, local neighborhood associations and leaderships, community stakeholders, and the General Plan Advisory Committee (GPAC) to participate in the development of a **Shared Vision for the future of Santa Ana**. This multi-year collaborative effort resulted the adoption of five core principles to guide the drafting of the General Plan. The extensive outreach process and development of the Core Value and guiding policies were documented in the following documents and attached at Attachments 2-4:

1. 2016 Community Outreach ["The First Conversation"](#)
2. 2017 GP Advisory Group ["Community Dialogue"](#)
3. 2018 ["Policy Framework"](#)

The Five Core Values and Relationship with Environmental Justice

Health: The people of Santa Ana value a physical environment that encourages healthy lifestyles, a planning process that ensures that health impacts are considered, and a community that actively pursues policies and practices that improve the health of our residents.

Equity: Our residents value taking all necessary steps to ensure equitable outcomes, expanding access to the tools and resources that residents need, and to balance competing interests in an open and democratic manner.

Sustainability: Santa Ana values land use decisions that benefit future generations, plans for the impacts of climate change, and incorporates sustainable design practices at all level of the planning process.

Culture: Our community values efforts that celebrate our differences as a source of strength, preserve and build upon existing cultural resources, and nurture a citywide culture of empowered residents.

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Education: We are a city that values the creation of lifelong learners, the importance of opening up educational opportunities to all residents, and investing in educational programs that advance our residents' economic wellbeing.

Early on in this process, it was apparent through the extensive outreach and collaborative work with the community that the **Five Core Values embodied and spoke to the issues of environmental, health, economic, and social equities and the active removal of barriers to achieving the Values.** Because the Core Values were to be reflected throughout the General Plan to emphasize the priority of each Value, it was determined that it was also appropriate to incorporate Environmental Justice (EJ) policies and implementation actions throughout the Plan in conjunction with the Five Core Values ensuring that the priority on addressing EJ issues is also emphasized. This emphasis is expressed as a symbol and in text within certain policies and implementation actions. Below is an example of how this concept is executed within the document.

POLICY LU-3.9

NOXIOUS, HAZARDOUS, DANGEROUS, AND
POLLUTING USES

Improve the health of residents, students, and workers by limiting the operation of noxious, hazardous, dangerous, and polluting uses that are in close proximity to sensitive receptors, with priority given to discontinuing such uses within environmental justice area boundaries.



The Environmental Justice Conversation with the Community

To date, over 48 community meetings, workshops, and over 100 in-person pop-ups at CARES event have been held to inform and receive input from the community. The outreach included an introductory video series, Citywide community meetings, and pop-up booths at city events and special gatherings throughout the City. Individual community workshops were held for each of the five Focus Areas to ensure direct input on the proposed changes in the Focus Areas. Over 300 residents, business leaders, and community stakeholders participated in the workshops. In addition, over 650 respondents participated in an online community survey.

The following environmental justice topics were discussed and addressed by community input from this outreach (with each topic listed in the GP Elements in a section called “Community Considerations”):

Community Element

- Ensure equitable access to programs
- Promote healthy food options
- Increase community participation

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Public Services Element

- Improve public safety through community-oriented policing
- Augment public services and programs

Conservation Element

- Ensure healthy air, water, and soil conditions

Open Space Element

- More open space and community centers
- More equitable distribution of open space
- Improve park safety and accessibility

Safety Element

- Mitigation of environmental vulnerabilities
- Responsible use and disposal of hazardous materials

Land Use Element

- Increase opportunities to expand affordable housing and reduce the cost of housing

Additionally, the City has been coordinating with the Madison Park community for many years, including participation in AB 617 community prioritization with the South Coast Air Quality Management District (SCAQMD)—involving both a bilingual meeting (5/30/18) and nomination of the community for AB 617 priority designation. When SCAQMD did not ultimately select this community for prioritization, the City helped Madison Park obtain \$185,118 in Community Air grant funding from the California Air Resources Board (CARB) for air quality monitoring.

Late in 2019, the City decided that it needed to conduct additional analysis to ensure it was not overlooking issues related to EJ and SB 1000, and to help refine the geographic areas most likely affected by EJ. Accordingly, the City evaluated CalEnviroScreen (version 3.0, updated in June 2019) information and documented the results in a series of materials (bilingual flyer, bilingual video, background analysis).

Once this additional analysis was complete in early 2020 and the City augmented its December 2018 draft policies based on the EJ analysis, best practices, and ongoing community input. The City conducted additional outreach to communicate the information between May and August 2020. Since mid-2020 the City has a dedicated web page focusing on providing information and educating about Environmental Justice with an online video learning tool that includes a narrated presentation to help educate and increase awareness on Environmental Justice issues and actions. However, to better reach community members, the City also distributed information by email, social media, and over 32,000 physical mailers to residents, businesses and property owners located in Santa Ana's EJ communities. Virtual community workshops were held on July 31st and August 1st of 2020 keeping the public updated on the General Plan and key issues,

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discuss environmental justice, share draft policies and actions, and communicate key public hearings and public review periods. At these meetings, some residents indicated that they were not aware of previous outreach efforts related to environmental justice issues. City staff explained that, while the City may not have explicitly referenced SB 1000 (much like the City did not explicitly reference SB 375 or SB 743), the topics and requirements listed in SB 1000 were considered both during the creation of the Core Values, outreach efforts, and the preparation of Draft Goals and Policies (which were released to the public in December 2018).

Based on the high level of interest expressed by the community at the July/August meetings, the City continued to participate in outreach meetings and discussions with the community on key issues such as proposed land use changes, environmental hazards, open space, and addressing EJ issues facing the community. Councilmembers, the City Manager, the Executive Director of Planning and Building, and City staff met with individual neighborhood leaders of disadvantage communities in the Logan and Madison Park neighborhoods as well as walking through the neighborhoods with residents and neighborhood leaders.

In addition, City staff participated in two roundtable discussions on September 30th and October 9, 2020, to discuss UC Irvine Public Health's recent Santa Ana Lead Contamination Study and potential general plan policies and actions to promote healthy solutions. The roundtables include representatives from UC Irvine Public Health, Orange County Environmental Justice (OCEJ), and Orange County Health Care Agency (OCHCA).

To further bolster the City's efforts, Planning staff has participated in over 100 CARES mobile resource events held throughout the City since August of 2020, providing opportunity for in-person engagement to discuss the General Plan and EJ issues. The CARES events were organized by the City, where City staff caravans throughout the City's most impacted neighborhoods and disadvantaged communities (DACs) to provide residents access to free COVID testing, PPEs, and information resources to assist residents with COVID related concerns. These events will continue into November of 2020. To date, the City has handed out over 60,000 information handouts (See Attachment 5), many of which through one-one-one in person interaction with City staff at the City's CARES events. Attachment 6 is a map of the 17 DACs and the coverage the CARES efforts have reached to date.

Additional outreach is continuing through November, including continued staff attendance at neighborhoods and City parks in conjunction with the CARES Program, meetings with interested organizations and neighborhood leaders, the hosting of a follow up EJ discussion with the Madison Park Neighborhood Association on August 31st and October 14th, and hosting a citywide EJ meeting with neighborhood groups and interested parties on October 19th. On October 23, 2020, City staff attended a meeting organized by local advocacy groups for the purpose of discussing EJ issues and providing feedback to the City. Staff received a copy of the presentation containing recommendations that are in

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line with the draft policies of the General Plan relating to reducing exposure to lead and other pollution sources within the City, prioritizing, preservation and creation of open space, addressing displacement and access to affordable housing, and enhancing transportation safety within the City. While these issues are already being addressed in the Plan, the recommendations will continue to be evaluated to help further refine and focus the draft policies and implementation actions prior to adoption.

Direct Line to City Leaderships

Two public General Plan study sessions have been held with the City Council, one on July 7th and one on October 20th, and two public study sessions have been held with the Planning Commission, one on August 24th and the second on September 14th. The public, all interested parties, and EJ community were all invited and had additional opportunities to provide direct input to the City leaderships and policymakers.

Neighborhood Initiative Program

Unique to Santa Ana and a function of the Planning Agency, the Neighborhood Initiatives Program (NIP) provides staff support and acts as a liaison between resident neighborhood associations and the City. This program has been in existence since 1985 and serves as a direct connection for residents to communicate with City leaderships and decision makers.

There are 64 established neighborhood associations in Santa Ana and they are the institutionally recognized citizen participation vehicle and this opens many doors for residents to be active. As a grassroots communication link between the City the neighborhood associations, NIP staff provides support and feedback on community issues for the General Plan update process and is the champion for addressing neighborhood issues. Examples of work efforts already underway by Santa Ana through NIP to address noxious uses affecting our DAC communities include air quality concerns from a crematorium and waste hauling operations in the Logan Neighborhood. Based on our experience, we understand EJ isn't a matter of simply calling the AQMD, CalRecycle, Orange County Health Care or other regulatory agencies to solve our community's EJ objectives, resident involvement and collaboration with community partners is essential to identifying and resolving EJ challenges in our City.

The 64 neighborhood associations are also represented by a seven-member Board of Directors elected by the leadership of the neighborhoods to serve on the Communication Linkages Forum (Com-Link) staffed and supported by NIP. Com-Link's work is ongoing and typically addresses issues of citywide interest, i.e. public policy in the areas of safety, development, finance and community standards. The group has a 25+ year track record of success and has monthly general membership meetings that are open to the public. Com-Link appointed a representative to be a part of the GPAC and their community meetings have been a forum for community input and periodic updates on the General Plan.

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Fine-Tuning EJ Policies and Implementation Actions

The AG provided valuable feedback about the draft policies and implementation actions. The City has reviewed all EJ policies and actions and have fine-tuned them providing better clarity and measurable directions. The City believes that the policies and implementation actions are significant measures to reduce pollution exposure, improve air quality, promote facilities, promote food access, promote safe and sanitary housing, and promote physical activities for residents of the City. Attachment 7 is a repository of the City's draft EJ policies and implementation actions incorporating refinements responsive to the community and AG's feedback.

Conclusion

The City's engagement and outreach efforts to the community and EJ neighborhoods over the past five years have been substantial and have resulted in a General Plan that reflects the voice and the values of the community and our residents. The Five Core Values were established early on through consulting and listening to the community and serve as pillars for guiding the drafting of General Plan policies and implementation actions. The Five Core Values embody and speak to achieving environmental, social, and economic equalities, and seeking justice and removal of barriers to equality that are woven in the fabric of the proposed General Plan, its policies, and implementation actions. The Neighborhood Initiative Program is a unique community building infrastructure which assisted the City with communicating and listening to the community and residents, and positions Santa Ana to more effectively implementing EJ policies than many other comparable communities. We remain confident that our outreach conducted thus far in support of Santa Ana's General Plan Update has met and exceeded the standard sets by SB 1000. While Santa Ana believes the policies that are already part of our draft General Plan Update are comprehensive, we remain very open to incorporating new ideas and recommendations.

Best regards,



Minh Thai
Executive Director
Planning and Building Agency

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Attachments:

1. Link: [2014 Five Year Strategic Plan https://www.santa-ana.org/sites/default/files/Documents/StrategicPlanCombined-FullDoc.pdf](https://www.santa-ana.org/sites/default/files/Documents/StrategicPlanCombined-FullDoc.pdf)
2. Link: 2016 Community Outreach [“The First Conversation”](#)
3. Link: 2017 GP Advisory Group [“Community Dialogue”](#)
4. Link: 2018 [“Policy Framework”](#)
5. CARES General Plan EJ Informational Handouts
6. DACs & CARES Map
7. EJ Policy and Implementation Actions

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ENVIRONMENTAL JUSTICE

In the City of Santa Ana General Plan



We are updating our General Plan and want to hear your thoughts on how to best address environmental justice issues affecting your community. Many of our neighborhoods have experience with environmental conditions that are of concern.

WHAT IS ENVIRONMENTAL JUSTICE?

Throughout our communities, some bear a disproportionate burden of pollution and associated health risks. Environmental justice seeks to correct this inequity by reducing pollution and increasing public investments in these communities, while also ensuring their input is considered in decisions that affect them.

Recent state law (SB 1000) requires all cities and counties to update public policies to address environmental justice. In Santa Ana, we are seeking to build upon the important work that our residents have already started to improve conditions for residences, childcare centers, schools, medical facilities, senior care centers, and parks & rec facilities in these communities.

WHAT IS AN EJ COMMUNITY?

An environmental justice community is an area of the City where residents have the highest risk of exposure to pollution in the air, water, and soil. This pollution may be caused by passing vehicles (cars and trucks) or by the daily activities of businesses and institutions. Residents in these areas also tend to be burdened by socioeconomic and health issues, such as higher rates of language barriers, poverty, and asthma.

Such areas also tend to experience lower rates of investment and improvements from individuals, private companies, and public agencies. All of these factors can lead to unequal opportunities to lead a healthy and prosperous life.

ENVIRONMENTAL JUSTICE COMMUNITIES IN SANTA ANA

The map below shows the combined boundaries of 17 census tracts in Santa Ana that are considered environmental justice communities.



The priorities to address in our communities include:



Diesel Emissions



Air Quality



Groundwater Contamination



Cleanup Sites



Traffic Density



Housing Burden



Linguistic Isolation



Low Birth Weight Infants



Poverty

Map above based on CalEnviroScreen 3.0 data published by CalEPA.

MAY 2020

CHANGES WE ARE MAKING

In the City of Santa Ana General Plan



The City is considering changes to its goals, policies, and actions that will improve existing and future conditions for all of Santa Ana, with a focus on those in greatest need of help and protection. Consistent with our General Plan Shared Vision and Core Values, the potential changes will emphasize:

Reducing exposure to pollution. Develop strategies and support regulations that will help reduce exposure to air pollution and hazardous materials.

Improving public facilities. Increase access to community health facilities, parks, community centers, and other public services and facilities, particularly in underserved areas.

Promoting healthy food. Improve the health and wellness of all residents through policies, regulations, and programs that foster healthier food options.

Creating safe and sanitary housing. Add to existing efforts to reduce health hazards associated with construction materials, building standards, and deferred maintenance.

Increasing physical activity. Establish new opportunities for outdoor and indoor recreation as part of a comprehensive and integrated network of spaces and facilities, with a focus on underserved areas.

Enhancing civic engagement. Increase the amount and quality of community engagement throughout the planning, development, and operation of our communities and City.

LEARN MORE & SHARE YOUR IDEAS

www.santa-ana.org/general-plan
newgeneralplan@santa-ana.org

COMMENTS? QUESTIONS?

Send us your insights and questions about environmental justice issues facing your community, as well as your thoughts about the draft goals, policies, and actions.



Để biết thêm thông tin, hãy truy cập trang web này: www.santa-ana.org/general-plan hoặc email newgeneralplan@santa-ana.org.
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LA JUSTICIA AMBIENTAL

En el plan general de la ciudad de Santa Ana



Estamos actualizando nuestro Plan General y queremos escuchar sus pensamientos sobre cómo abordar mejor los problemas de justicia ambiental que afectan a su comunidad. Muchos de nuestros vecindarios tienen la experiencia con condiciones ambientales que son preocupantes.

¿QUÉ ES LA JUSTICIA AMBIENTAL?

En todas nuestras comunidades, algunas soportan una carga desproporcionada de contaminación y los riesgos de salud asociados. La justicia ambiental busca corregir esta inequidad mediante la reducción de la contaminación y el aumento de las inversiones públicas en estas comunidades, al mismo tiempo que se garantiza que su aporte sea considerado en las decisiones que les afectan.

La ley estatal reciente (SB 1000) requiere que todas las ciudades y condados actualicen las políticas públicas para abordar la justicia ambiental. En Santa Ana, buscamos usar de base el importante trabajo que nuestros residentes ya han comenzado para mejorar las condiciones para residencias, centros de cuidado infantil, escuelas, instalaciones médicas, centros de atención para personas de la tercera edad, y parques e instalaciones recreativas en estas comunidades.

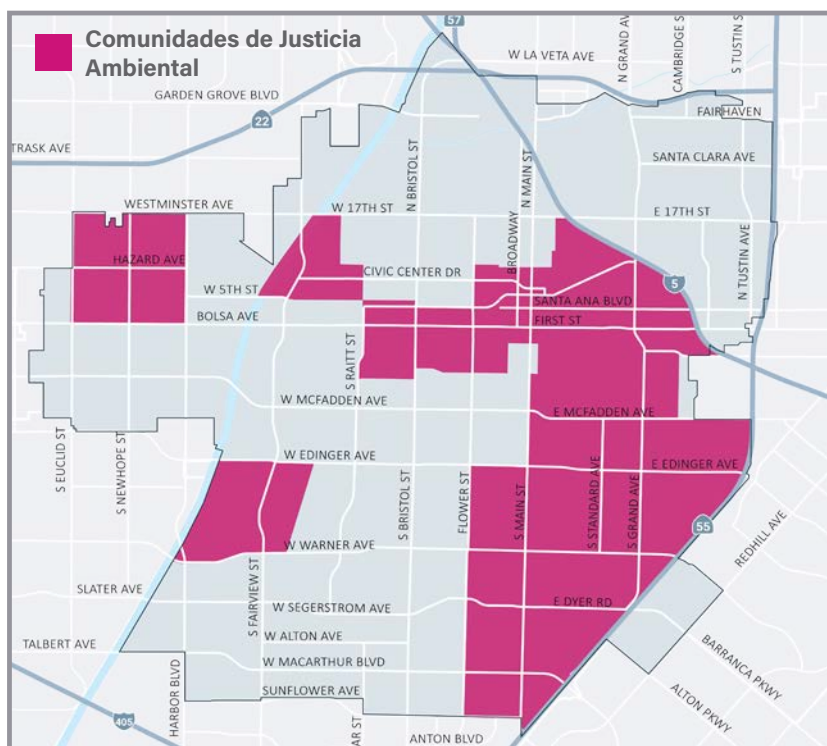
¿QUÉ ES UNA COMUNIDAD JUSTICIA AMBIENTAL (EJ)?

Una comunidad de justicia ambiental es un área de la ciudad donde los residentes tienen el mayor riesgo de exposición a la contaminación del aire, el agua y el suelo. Esta contaminación puede ser causada por el paso de vehículos (automóviles y camiones) o por las actividades diarias de empresas e instituciones. Los residentes en estas áreas también tienden a estar cargados por problemas socioeconómicos y de salud, como las tasas más altas de barreras del idioma, la pobreza y el asma.

Dichas áreas también tienden a experimentar las tasas más bajas de inversión y mejoras de individuos, empresas privadas y agencias públicas. Todos estos factores pueden causar oportunidades desiguales para llevar una vida saludable y próspera.

LAS COMUNIDADES DE JUSTICIA AMBIENTAL EN SANTA ANA

El siguiente mapa muestra los límites combinados de las 17 secciones censales en Santa Ana que se consideran comunidades de justicia ambiental.



Las prioridades para abordar en nuestras comunidades incluyen:



Emisiones de Diesel



La Calidad del Aire



La Contaminación de las Aguas Subterráneas



Los Sitios de Limpieza



La Densidad del Tráfico



La Carga de Vivienda



El Aislamiento Lingüístico



Los Bebés de Bajo Peso al Nacer



La Pobreza

El mapa de arriba está basado en los datos de CalEnviroScreen 3.0 publicados por CalEPA.

MAYO 2020

LOS CAMBIOS QUE ESTAMOS HACIENDO

En el plan general de la ciudad de Santa Ana



La Ciudad está considerando cambios en sus objetivos, políticas y acciones que mejorarán las condiciones existentes y futuras para toda Santa Ana, con un enfoque en aquellos que necesitan ayuda y protección. De acuerdo con nuestro Plan General de Visión Compartida y Valores Centrales, los cambios potenciales enfatizarán:

La reducción de la exposición a la contaminación. Desarrollar estrategias y apoyar regulaciones que ayudan a reducir la exposición a la contaminación del aire y materiales peligrosos.

El mejoramiento de las instalaciones públicas. Aumentar el acceso a las instalaciones de salud comunitarias, parques, centros comunitarios y otros servicios e instalaciones públicas, particularmente en áreas desatendidas.

La promoción de alimentos saludables. Mejorar la salud y el bienestar de todos los residentes a través de las políticas, los reglamentos y los programas que fomenten opciones de alimentos más saludables.

La creación de viviendas seguras y sanitarias. Agregar a los esfuerzos existentes para reducir los riesgos de salud asociados con los materiales de construcción, los estándares de construcción y el mantenimiento diferido.

El aumento de la actividad física. Establecer nuevas oportunidades para la recreación al aire libre y bajo techo como parte de una red integral e integrada de espacios e instalaciones, con un enfoque en áreas desatendidas.

El mejoramiento del compromiso cívico. Aumentar la cantidad y la calidad de la participación comunitaria a lo largo de la planificación, el desarrollo y la operación de nuestras comunidades y la ciudad.

ENTÉRESE MÁS Y COMPARTE SUS IDEAS

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¿COMENTARIOS? ¿PREGUNTAS?

Envíenos sus puntos de vista y preguntas sobre los problemas de justicia ambiental que enfrenta su comunidad, así como también sus pensamientos sobre los objetivos, las políticas y las acciones preliminares.

Asista a las reuniones de enlace comunitaria virtuales para obtener más información y hacer preguntas

JUNIO/JULIO 2020

JUNIO 2020

www.santa-ana.org/general-plan
 Vea una presentación y revise los últimos objetivos y políticas preliminares relacionados con la justicia ambiental

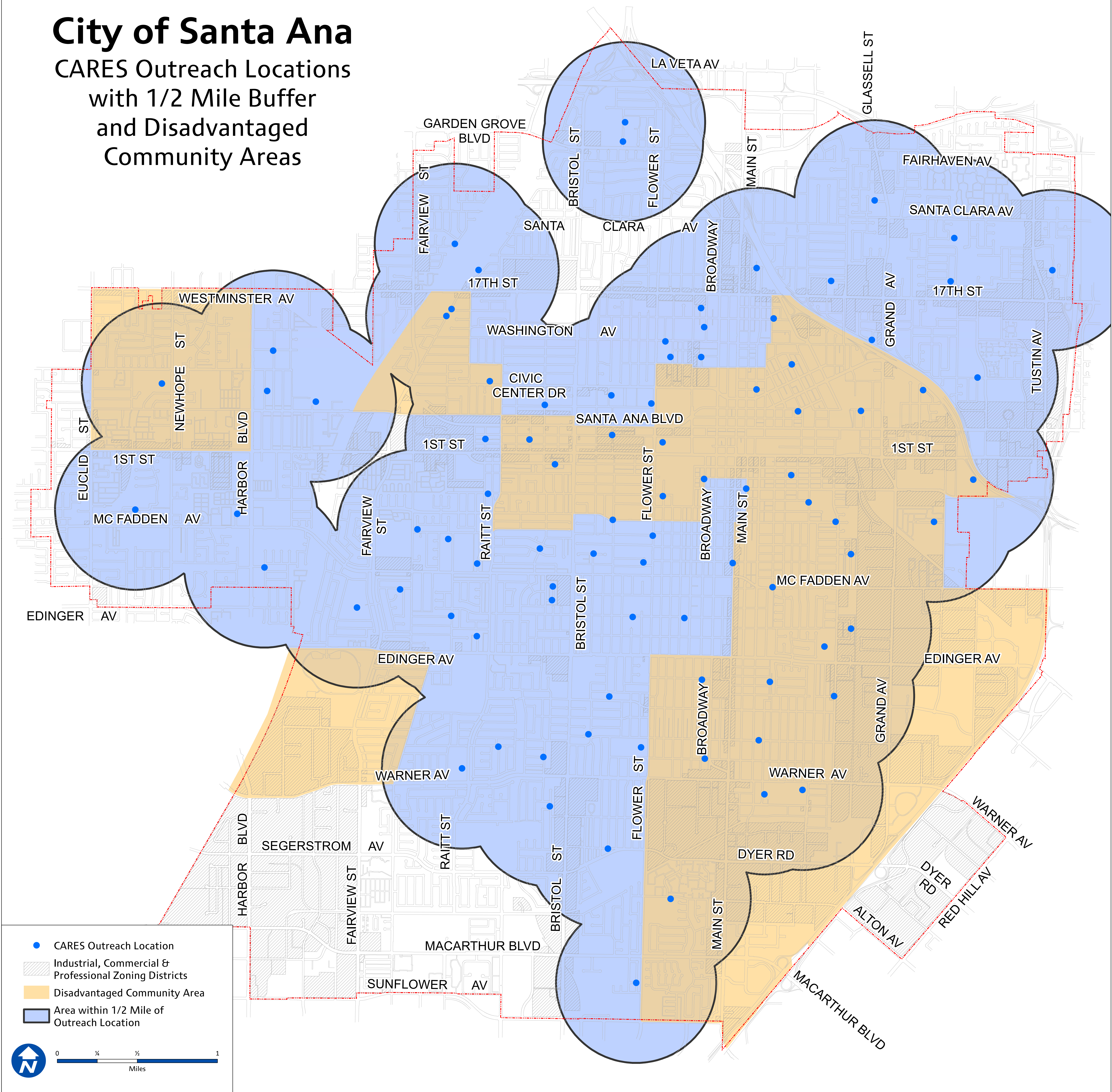
FINALES DE 2020

Adopta nuestro Plan General de Santa Ana

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City of Santa Ana

CARES Outreach Locations with 1/2 Mile Buffer and Disadvantaged Community Areas



Draft City of Santa Ana General Plan Environmental Justice Policies

CM-1.1 Access to Programs. Provide and maintain access to recreational and cultural programs within walking distance of residential areas. Prioritize the improvement of access for residents living within environmental justice area boundaries that are underserved or suffer from a lack of access.

CM-1.2 Community Input. Engage residents and community facility users to provide input for facility improvements and programming.

CM-1.3 Equitable Programs. Encourage cultural programs and activities of local interest that are inclusive and affordable to all.

CM-1.4 Shared Use. Expand community activities and programs at City facilities and throughout the community through shared use or cooperative agreements.

CM-1.5 Equitable Recreational Spaces. Promote the development and use of municipal buildings, indoor facilities, sports fields, and outdoor spaces for recreation that serve residents throughout the City, with priority given to areas that are underserved and/or within environmental justice area boundaries.

CM-1.11 Program Incentives. Incentivize use of privately owned property to promote recreation, health, wellness, and art and culture programs.

CM-2.1 Supporting Organizations. Collaborate with both private and public organizations that support early childhood education programs to optimize and expand service capacity.

CM-2.2 Educational Facilities Capacity. Partner with local school districts, non-profit organizations, and other educational providers regarding land use and policy changes to ensure available educational facilities.

CM-2.4 Parent Participation. Support education, recreation programs, and after school activities that involve parent participation to increase high school graduation and college attendance rates.

CM-3.1 Supporting Health Services. Collaborate with and provide support to organizations engaged in improving public health and wellness, expanding access to affordable quality health care, and providing medical services for all segments of the community. Encourage greater emphasis on expanding or improving health services to underserved areas and populations.

CM-3.2 Healthy Neighborhoods. Continue to support the creation of healthy neighborhoods by addressing public safety, mitigating incompatible uses, and maintaining building code standards.

CM-3.3 Healthy Residential Programs. Invest in programs and public improvements that educate residents about opportunities to increase their physical activity and improve their health.

CM-3.5 Community Spaces. Encourage positive community interactions and neighborhood pride to create secure communities and promote safe public spaces.

CM-3.6 Healthy Options. Promote access to affordable, fresh, and healthy food options citywide through efforts such as community gardens, culinary classes, and neighborhood farmers markets.

CM-3.7 Active Lifestyles. Support programs that create safe routes to schools and other destinations to promote walking, biking and active lifestyles.



Draft City of Santa Ana General Plan Environmental Justice Policies

CM-3.8 Underutilized Spaces. Promote access to affordable, fresh, and healthy food. Repurpose underutilized spaces and City-owned vacant land as a strategy to improve community health and increase the number and accessibility of opportunities for health and recreation activities. Prioritize the redevelopment of such sites within environmental justice area boundaries that are also underserved by parks and recreation opportunities.

CM-3.9 Prevention. Coordinate with the County Health Care Agency to promote healthier communities through education, prevention, and intervention programs, and other activities that address the root causes of health disparities and inequities in Santa Ana.

CN-1.2 Climate Action Plan. Consistency with emission reduction goals highlighted in the Climate Action Plan shall be considered in all major decisions on land use and investments in public infrastructure.

CN-1.3 Education. Promote efforts to educate businesses and the general public about air quality standards, reducing the urban heat island effect, health effects from poor air quality and extreme heat, and best practices they can make to improve air quality and reduce greenhouse gas emissions.

CN-1.5 Sensitive Receptor Decisions. Consider potential impacts of stationary and non-stationary emission sources on existing and proposed sensitive uses and opportunities to minimize health and safety risks. Mitigate or apply special considerations and regulations on the siting of facilities that might significantly increase pollution near sensitive receptors within environmental justice area boundaries.

CN-1.8 Promote Alternative Transportation. Promote use of alternate modes of transportation in the city of Santa Ana, including pedestrian, bicycling, public transportation, car sharing programs and emerging technologies.

CN-1.9 Public Investment Alternative Transportation Infrastructure. Continue to invest in infrastructure projects that support public transportation and alternate modes of transportation in the City of Santa Ana, including pedestrian, bicycling, public transportation, car sharing programs, and emerging technologies.

CN-1.15 Priority Community Areas. Collaborate with the South Coast Air Quality Management District and local stakeholders in advance of designation as a priority community for air monitoring and reduction, and implement measures and strategies identified in other air monitoring and emissions reduction plans that are applicable to and feasible for Santa Ana.

CN-1.16 Clean Legislation. Support the development of regional legislation such as the drayage truck rule, advanced clean truck route, and heavy-duty low NOx rule by the South Coast Air Quality Management District.

EP-1.9 Avoid Conflict of Uses. Avoid potential land use conflicts by prohibiting the location of sensitive receptors and noxious land uses in close proximity.

EP-3.3 Mitigate Impacts. Promote the development of sustainable and equitable new land use plans that proactively mitigates negative impacts on existing residents and businesses.

LU-1.1 Compatible Uses. Foster compatibility between land uses to enhance livability and promote healthy lifestyles.

LU-1.3 Equitable Distribution of Open Space. Promote the creation of new open space and community serving amenities in park deficient areas, with priority given to those that are also within environmental justice area boundaries.



Draft City of Santa Ana General Plan Environmental Justice Policies

LU-1.7 Active Transportation Infrastructure. Invest in active transportation connectivity between activity centers and residential neighborhoods to encourage healthy lifestyles.
LU-2.3 Supportive Spaces. Provide a diversity of land uses that support residents, visitors, and businesses, such as open space, areas for community gatherings, and outdoor entertainment venues.
LU-2.9 Open Space Needs. Establish and maintain public open space and recreation requirements for new residential and nonresidential uses to provide sufficient open space and recreational opportunities for Santa Ana residents and visitors.
LU-3.2 Empower Community. Facilitate community engagement and dialogue in policy decisions and outcomes affecting land use and development, with supplemental opportunities for proposed planning activities within environmental justice area boundaries.
LU-3.8 Sensitive Receptors. Avoid the development of sensitive receptors in close proximity to land uses that pose a hazard to human health and safety, due to the quantity, concentration, or physical or chemical characteristics of the hazardous materials that they utilize, or the hazardous waste that they generate or emit.
LU-3.9 Noxious, Hazardous, Dangerous, and Polluting Uses. Improve the health of residents, students, and workers by limiting the operation of noxious, hazardous, dangerous, and polluting uses that are in close proximity to sensitive receptors, with priority given to discontinuing such uses within environmental justice area boundaries.
LU-3.11 Air Pollution Buffers. Promote landscaping and other buffers to separate existing sensitive uses from rail lines, heavy industrial facilities, and other emissions sources. As feasible, apply more substantial buffers within environmental justice area boundaries.
LU-3.12 Indoor Air Quality. Require new sensitive land uses proposed in areas with high levels of localized air pollution to achieve good indoor air quality through landscaping, ventilation systems, or other measures.
LU-4.6 Healthy Living Conditions. Support diverse and innovative housing types that improve living conditions and promote a healthy environment.
LU-4.8 Community Partnerships. Collaborate with property owners, community organizations, and other local stakeholders to identify opportunities for additional open space and community services, such as community gardens and gathering places.
LU-4.9 Recreational Amenities. Encourage public and commercial recreational facilities in areas that are park and open space deficient.
OS-1.1 Park Master Plan. Create and maintain a Santa Ana parks master plan that incorporates data on need, demographics, and health outcomes.
OS-1.2 Parks and Recreation Network. Support a comprehensive and integrated network of parks, open space, and recreational facilities that maintains and provides a variety of active and passive recreational opportunities that meets the needs of all Santa Ana residents, regardless of age, ability, or income.
OS-1.3 Park Standard. Achieve a minimum citywide park ratio of two acres per 1,000 residents. For new residential development in Focus Areas, prioritize the creation and dedication of new public parkland over the collection of impact fees.
OS-1.4 Park Connectivity. Establish and enhance options for residents to access existing and new park facilities through safe walking, bicycling, and transit routes.



Draft City of Santa Ana General Plan Environmental Justice Policies

OS-1.7 Community Building. Ensure that park facilities and programs reflect the priorities of residents in the surrounding neighborhoods, with attention to place-making elements that foster social interaction and community pride such as art, landscape, monuments, murals, play equipment, seating, and community centers.
OS-1.10 Shared Use. Collaborate with school districts, faith-based communities, and community serving organizations to expand shared use facilities through cooperative agreements, as well as pursuing multiple use strategies of publicly owned land.
OS-1.12 Neighborhood Needs. Consider unique neighborhood needs in the development of open spaces and programs.
OS-1.13 Indoor Recreation. Encourage new development to provide indoor recreation space when located in areas with high levels of localized air pollution or if site is adjacent to freeways or heavy industrial uses.
OS-2.2 Neighborhood Engagement. Encourage residents, neighborhood groups, businesses, schools, organizations, and public agencies to partner in the creation and maintenance of safe and well maintained publicly-owned park and recreation facilities.
OS-2.3 Hazardous Materials. Reduce or eliminate, as feasible, the use of pesticides and herbicides that negatively impact human health at park facilities and publicly accessible open spaces.
OS-2.5 Urban Agriculture. Expand urban agriculture opportunities in private development and public spaces, including home gardens, community gardens, and urban farms.
OS-2.6 Facility Maintenance. Ensure all park facilities and open spaces are well maintained.
OS-3.1 Recreational Corridors. Establish and maintain an integrated recreational and multi-modal commuter corridor network linking open spaces, housing, community services, and employment centers.
OS-3.2 Linking Development. Promote alternative modes of transportation and active lifestyles through pedestrian and bicycle linkages to new and existing development, greenway corridors, and open spaces.
OS-3.3 Publicly Owned Land. Maintain and explore options for publicly owned land for the creation of open space pathways and corridors.
PS-1.2 Equitable Distribution. Ensure public services and facilities reflect changing population needs and are equitably distributed and accessible, with priority assigned to improving areas that are underserved and/or within environmental justice area boundaries.
PS-1.5 Community Benefit. Collaborate with community stakeholders to expand recreational, educational, cultural opportunities, promote active lifestyles, and maximize community benefit.
PS-1.8 Access for All. Improve connectivity and ADA accessibility at all public facilities.
PS-1.9 Supportive Housing. Collaborate with community stakeholders to identify and encourage the development of suitable sites for housing with support services.
PS-1.11 Safety. Remove actual and perceived safety concerns that create barriers to physical activity by requiring adequate lighting, street visibility, and areas of clear connectivity, especially for new projects or improvements within environmental justice area boundaries.



Draft City of Santa Ana General Plan Environmental Justice Policies

S-2.1 Regional Collaboration. Consult and collaborate with federal, state, and regional agencies to identify and regulate the disposal and storage of hazardous materials, prevent the illegal transportation and disposal of hazardous waste, and facilitate the cleanup of contaminated sites.

S-2.2 Hazardous Waste Generators. Collaborate with appropriate agencies to identify and inventory all users and handlers of hazardous materials to proactively mitigate potential impacts.

S-2.3 Transportation and Storage. Coordinate with the County of Orange, the California Department of Transportation, and other relevant parties to enforce state and local laws regulating the storage and transport of hazardous materials within the City of Santa Ana, and limit truck routes through the City to arterials streets away from natural habitats and sensitive land uses.

S-2.4 Planning and Remediation. Determine the presence of hazardous materials and/or waste contamination prior to approval of new uses and require that appropriate measures be taken to protect the health and safety of site users and the community.

S-2.5 Education and Best Practices. Promote public awareness of best practices for and participation in household hazardous waste management and disposal.

S-2.6 Existing Sensitive Uses. Partner and collaborate with property owners, businesses, and community groups to develop strategies to protect and minimize risks from existing hazardous material sites to existing nearby sensitive uses, with priority given to discontinuing such uses within environmental justice area boundaries.

UD-1.6 Active Transportation Infrastructure. Support the creation of citywide public street and site amenities that accommodate and promote an active transportation-friendly environment.

UD-3.2 Activate Paths. Strengthen and activate the design of paths and adjacent development through enhanced and cohesive streetscapes, architectural themes, and landscaping.

UD-3.3 Foster Community Building. Promote a safe environment that facilitates social interaction and improves active transportation along corridors.

UD-3.6 Linear Park System. Support open space improvements along roadways and non-vehicular paths, such as bike or multi-use trails, to connect linear greenways leading to a network of parks and activity areas throughout the city

S:\Planning\General Plan 2016\Documents\EJ Materials\EJ Policies with Track Changes 10.29.20 Clean.docx



Draft City of Santa Ana General Plan
Environmental Justice Implementation Actions

TABLE CM-2. COMMUNITY ELEMENT IMPLEMENTATION

Ref #	Implementation Action	Agency / Time
Goal CM-1: Provide opportunities for public and private recreation and cultural programs that meet the needs of Santa Ana's diverse population.		
1.1	Engage EJ communities. Establish an ad hoc committee of community stakeholders to guide preparation of an ongoing EJ community engagement program.	PBA 2021
1.2	Community conversation. Plan for and conduct a community survey every three years related to community health, air quality concerns, parks, and community service needs, with focused outreach to environmental justice priority areas.	CMO 2022
1.3	Collaboration. Develop intentional, strategic partnerships with public, private, and nonprofit entities to improve health outcomes by leveraging capacity, resources, and programs around mutually beneficial initiatives that promote health, equity, and sustainability in neighborhoods within environmental justice area boundaries. Develop a comprehensive partnership policy providing guidelines that can be used throughout the City organization.	PBA/PRCS A 2021
1.4	Community coordination on underutilized spaces. Coordinate with community residents, property owners, and other stakeholders to identify vacant and potentially underutilized properties and strategize how such properties could be repurposed into public parks or commercial recreation facilities.	PBA/PRCS A 2022 & ongoing
1.5	Alternative facilities. For areas that are underserved by parks and recreation facilities and that are within environmental justice area boundaries, prepare an inventory of facilities that are viable alternatives to public parks and municipal facilities for recreational, cultural, and health and wellness programs, including but not limited to school facilities, facilities of faith-based and civic organizations, and privately owned recreation and entertainment facilities. Identify, inventory, and rank other resources for potential park system acquisition, expansion to existing parks, and/or parks development opportunity within the community.	PRCSA 2022
1.6	Program accessibility. To ensure residents of environmental justice area boundaries have access to recreational, cultural, and health and wellness programs, establish accessibility corridors that provide attractive, comfortable, and safe pedestrian and bike access to public recreational facilities in the Parks Master Plan (an implementation action of the Open Space Element). Identify public realm improvements needed to create these accessibility corridors. Prioritize investments for accessibility corridors in the city's capital investment program; include investments for accessibility corridors when investments are made in new parks and recreation facilities within environmental justice area boundaries.	PRCSA/PW A 2022
1.7	Rental property outreach. Augment the Proactive Rental Enforcement Team and Residential Response Team with additional outreach geared toward absentee owners of rental properties. Create and periodically distribute outreach materials in order to educate absentee owners about legal obligations to maintain and upkeep rental properties. Distribute information to tenants about their rights and protection, so they are not penalized for	PBA 2022



TABLE CM-2. COMMUNITY ELEMENT IMPLEMENTATION

Ref #	Implementation Action	Agency / Time
	reporting or living in a dwelling unit that does not meet health and safety standards. Translate outreach efforts into Spanish, Vietnamese, and other appropriate languages. Prioritize such outreach for properties within environmental justice area boundaries.	
1.8	Neighborhood rehabilitation. Continue to seek state and federal funding for neighborhood rehabilitation projects and collaborate with community-based organizations to identify housing issues and improvements needed, especially for housing within environmental justice area boundaries.	CDA Ongoing
GOAL CM-2: Provide exceptional, accessible, and diverse educational programs and facilities to meet community needs.		
2.1	Facilities to support lifelong learning. For areas within environmental justice area boundaries, conduct, maintain, and publicize an inventory of public, nongovernmental, and private facilities that can be used by organizations to support early childhood education, after school activities, libraries and learning centers, and other meetings and educational opportunities.	CMO 2024
2.2	Public realm. Identify areas in need of a public realm plan to provide attractive, comfortable, and safe walking corridors to promote accessibility to community programs or activity centers, in conjunction with the City's Active Transportation Plan.	PWA/PBA Ongoing
GOAL CM-3: Promote the health and wellness of all Santa Ana residents.		
3.1	Community health care facilities. Evaluate options to support existing and potential community health care facilities in environmental justice focus areas through a variety of mechanisms such as reduced permit fees, reduced impact fees, and tax incentives.	PBA/CMO 2023
3.2	Pedestrian access to health facilities. Ensure that new or redeveloped health care facilities include pedestrian-friendly site amenities. In areas where mobile clinics are stationed, ensure the location is safe and accessible for pedestrians, cyclists, and transit users.	PBA Ongoing
3.3	Health metrics. Engage with the Orange County Health Care Agency and other stakeholders to monitor key health indicators to measure the success of the outcome of General Plan policies and the implementation plan, including reduction in incidence in asthma .	PBA/CMO 2021
3.4	Prevention activities. Coordinate with the County Health Care Agency to identify the root causes of health disparities and inequities in Santa Ana, with additional detail for residents living within environmental justice area boundaries. Identify potential programmatic changes and resources to better address the root causes.	PBA/CMO 2022
3.5	Environmental education. Encourage all education institutions in Santa Ana to include curriculum regarding environmental justice and local efforts to promote clean business operations, environmental quality, and the health in our community.	PBA/CMO 2021



TABLE CM-2. COMMUNITY ELEMENT IMPLEMENTATION

Ref #	Implementation Action	Agency / Time
3.6	Fresh and healthy foods. Pursue programs, incentives, and/or grants to encourage small grocery or convenience stores to sell fresh foods in the city, especially those within environmental justice area boundaries. Examples include grants or loans to purchase updated equipment, publicity, or directories of healthy food outlets, or connecting stores to wholesale sources of healthy, local, or organic food.	CDA 2022
3.7	Public health and wellness collaboration summit. Collaborate with health care providers, health and wellness advocates, and other public health stakeholders to identify ways to improve the provision of and access to health and wellness services throughout the city. Include a discussion on areas within environmental justice area boundaries underserved by affordable health and wellness services.	PRCSA 2022 & ongoing

Notes:

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TABLE EP-2. ECONOMIC PROSPERITY ELEMENT IMPLEMENTATION

Ref #	Implementation Action	Agency / Time
GOAL EP-3: Business Friendly Environment Promote a business friendly environment where businesses thrive and build on Santa Ana's strengths and opportunities.		
3.5	Green business incentives. Continue to promote and market the Recycling Market Development Zone. Develop an incentive program to encourage nonpolluting industry and clean green technology companies that reduce environmental impacts and the carbon footprint to locate to the city. Encourage existing businesses to invest in technology and best practice to transition to sustainable business practices.	CDA Ongoing
Notes: CDA - Community Development Agency CMO - City Manager's Office HR - Human Resources Department PBA - Planning and Building Agency PWA - Public Works Agency PRCSA - Parks, Recreation and Community Services Agency PD - Police Department		

TABLE PS-2. PUBLIC SERVICES ELEMENT IMPLEMENTATION

Ref #	Implementation Action	Agency / Time
GOAL PS-1: Public Facilities Provide quality and efficient facilities that are adequately funded, accessible, safe, and strategically located.		
1.4	Fiscal priority for public improvements. Identify City fiscal and operational procedures and potential thresholds involved in the prioritization of general funds for public programming, service, or infrastructure improvements for residents living within environmental justice area boundaries.	CMO 2021 & annually
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TABLE CN-3. CONSERVATION ELEMENT IMPLEMENTATION

Ref #	Implementation Action	Agency / Time
GOAL CN-1: Air Quality and Climate Protect air resources, improve regional and local air quality, and minimize the impacts of climate change.		
1.1	Air quality planning. Review existing and monitor the development of new air monitoring and emissions reduction plans prepared by the South Coast Air Quality Management District. Gather and evaluate measures and strategies in such plans for their applicability to and feasibility for Santa Ana.	PBA 2021 & annually
1.2	Community identification. Coordinate with the South Coast Air Quality Management District and local stakeholders to pursue a priority community designation for eligible environmental justice areas of the city, with focus on areas with unique needs and pollution burden such the Delhi Neighborhood area . If such designation is not awarded, seek grant funds for activities such as local air quality monitoring.	PBA 2021 ¹²
1.3	Proactive engagement. Collaborate with the South Coast Air Quality Management District and local stakeholders in environmental justice areas experiencing local air pollutions issues to outline objectives and strategies for monitoring air pollution in advance of the establishment of a community emissions reduction and/or air monitoring plan.	PBA 2021
1.4	Health risk criteria. Establish criteria for requiring health risk assessments for existing and new industries, including the type of business, thresholds, and scope of assessment.	PBA 2022
1.5	Agency permits. Monitor the South Coast Air Quality Management District permitting and inspection process and the Orange County Health Care Agency to identify businesses in Santa Ana with potential hazardous materials or by-products, with a special focus on environmental justice communities. Serve as a liaison for residents to identify potential emission violations. Share information and data with the community on the City's Environmental Quality web page.	PBA 2021
1.6	Emissions monitoring. Coordinate with the South Coast Air Quality Management District to monitor existing air measurements and recommend new air measurements and locations.	PBA 2022
1.7 ⁹	Truck idling. Evaluate strategies to reduce truck idling found or reported in areas with sensitive receptors, with a priority placed on environmental justice areas.	PBA/PD 2023
1.8 ¹⁰	Improve older trucks. Promote the City's Vehicle Replacement Plan and explore the replacement of older trucks through City participation in regional incentive programs and education of Santa Ana private fleet owners of program opportunities.	PWA 2022
1.9 ¹¹	Indirect source rules. Support the development of indirect source rules, drayage truck rules, advanced clean truck routes, and heavy-duty low NOx rules by the South Coast Air Quality Management District.	CMO Ongoing
1.10 ²	Interagency team. Establish an environmental quality interagency team to evaluate, monitor, and make recommendations to address air quality and environmental hazard issues, with a special focus on environmental justice areas. Publish results and information on the City's	PBA 2021



TABLE CN-3. CONSERVATION ELEMENT IMPLEMENTATION

Ref #	Implementation Action	Agency / Time
	website through a dedicated Santa Ana Environmental Quality web page on environmental quality in Santa Ana.	
1.1 13 ¹⁴	Public education. Augment existing programs to improve public awareness of State, regional, and local agencies and resources to assist with air quality and other environmental quality concerns.	PBA/PWA Ongoing
1.1 24 ²⁵	Data collection for emissions plans. Coordinate with the South Coast Air Quality Management District to explore ways to initiate data collection efforts for a community emissions reduction and/or community air monitoring plan, including the identification of information needed (new or updated), potential data sources and needed resources, and strategies to engage residents and collect information.	PBA 2021
1.1 35 ³⁶	Community survey on healthy lifestyles. Plan for and conduct a community survey of residents related to community health, air quality, parks, and community services; with focused outreach for environment justice concerns and priority areas (tie into other City efforts like Strategic Plan, park and recreation planning, community benefits, etc.).	CMO 2022
1.1 46 ⁴⁷	Expanded interactions. Identify opportunities to expand regular attendance of City staff and decision-makers at meetings for neighborhoods within environmental justice area boundaries, so that residents and businesses can more easily communicate their unique issues and needs. Include a translator(s) at these meetings so that all residents can engage.	PBA/CMO Ongoing
1.1 57 ⁵⁸	Expanded representation. Expand representation of residents from neighborhoods within environmental justice area boundaries by extending residents from such areas to become board, commission, and task force members as openings occur.	PBA/CMO Ongoing
1.1 68 ⁶⁹	City budget. Evaluate the City's budget and financial policies to include direction for prioritizing public services and improvements within environmental justice area boundaries. Augment budget meeting presentations to include a section dedicated to the status of actions and improvements to address the needs of residents within environmental justice area boundaries.	CMO Annually

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TABLE OS-3. OPEN SPACE ELEMENT IMPLEMENTATION

Ref #	Implementation Action	Agency / Time
Goal OS-1: Parks, Open Space, and Recreation Provide a safe, accessible, sustainable, and diverse park and facility system with recreational opportunities accessible to all residents.		
1.2	Indoor recreation. Explore best practices and options to incentivize or require the provision of indoor open space, particularly in environmental justice areas that experience high levels of exposure to air pollution.	PRCSA 2023
1.15	<u>Public parkland requirements for larger residential projects. Amend the Residential Development Fee in the Municipal Code (Chapter 35, Article IV) to reflect requirements for Larger Residential Projects (100+ units, residential only or mixed-use) to facilitate the creation two acres of new public parkland within a 10-minute walking radius of the new residential project. Establish provisions that allow the Larger Residential Projects to reduce all onsite private and common open space requirements by 50 percent if new public parkland is provided within a 10 minute walking radius and by 80 percent if the new public parkland is immediately adjacent to or on the residential project property. Work with property owners and new development projects within the Focus Areas to identify options (e.g., 100 percent reduction of onsite private and public open space requirements) that would incentivize the creation of public park areas that are more than the minimum and/or if a location can expand park access for an adjoining underserved neighborhood and/or environmental justice area. Establish incentives for coordination between two or more residential projects (of any size) to create larger and/or more centralized public park space.</u>	<u>PBA/PRCSA A 2022</u>
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TABLE S-2. SAFETY ELEMENT IMPLEMENTATION

Ref #	Implementation Action	Agency / Time
GOAL S-2: Hazardous Materials Protect residents and environmental resources from contaminated hazardous material sites and minimize risks associated with the use, production, storage, transport, and disposal of hazardous materials.		
2.4	Lead contamination. Work <u>with local</u> with community organizations and regional partners, <u>such as Orange County Environmental Justice, Orange County Health Care Agency and University of California at Irvine Public Health</u> , to understand the prevalence, sources, and implications of lead contamination of soil across Santa Ana. Collaborate with environmental justice stakeholders in proposing solutions to remove hazardous lead-contaminated soils in the city <u>and with benchmarks to measure and track effectiveness of proposed programs</u> .	PBA/CDA 2021
2.5	Business education. Collaborate with state and county agencies and trade organizations to educate and inform industrial business owners about permit regulations required for safe facility operations and about best practices.	PBA 2021
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TABLE LU-10. LAND USE ELEMENT IMPLEMENTATION

Ref #	Implementation Action	Agency / Time
GOAL LU-2: Land Use Needs Provide a balance of land uses that meet Santa Ana's diverse needs.		
2.10	Open space requirements. Evaluate public open space and park requirements in the zoning code for residential and nonresidential uses. Consider requirements and/or incentives to aggregate public open space areas required by two or more uses to form larger and more usable areas and facilities.	PBA/PRCS A 2022
GOAL LU-3: Compatibility of Uses Preserve and improve the character and integrity of existing neighborhoods and districts.		
3.2	Design guidelines and standards. Update the zoning code's development and operational standards for industrial zones to address incompatibility between <u>with</u> adjacent residential uses, including minimum distance requirements to buffer heavy industrial uses from sensitive receptors. <u>Conduct a study to evaluate and establish appropriate minimum distances and landscape buffers between polluting industrial uses from sensitive receptors such as residences, schools, day care, and public facilities.</u>	PBA 2021 2
3.3	Healthy lifestyles. Collaborate with residents and industry stakeholders to create a program to incentivize and amortize the removal of existing heavy industrial uses adjacent to sensitive uses.	PBA 2022
3.4	Funding for air filtration. Seek funding from South Coast Air Quality Management District and other regional sources for the installation of high-efficiency air filtration systems in buildings, homes, and schools located in areas with high levels of localized air pollution, especially for those within environmental justice area boundaries.	PBA 2022
3.5	Business incentive. Explore economic development incentives and grant funding to encourage existing or draw new business investments in the industrial zones to incorporate more environmentally sustainable practices.	CDA Ongoing
3.6	Lead paint abatement. Coordinate with County of Orange Health Care Agency <u>and community organizations</u> to establish and maintain <u>strengthen local</u> a <u>programs</u> to eliminate lead-based paint hazards, with priority given to residential buildings within environmental justice area boundaries.	CDA 2021 2
3.14	Sunshine ordinance. Update City Sunshine Ordinance, incorporating best practices for outreach in environmental justice areas in Santa Ana.	CMO 2022
3.15	Communication tools. Explore tools for communication with residents and sensitive receptors when new industrial uses are proposed in their areas.	PBA 2021
<u>3.16</u>	<u>Health in corridors. Require a Health Risk Assessment to identify best practices to minimize air quality and noise impacts when considering new residential uses within 500 feet of a freeway.</u>	<u>PBA</u> <u>Ongoing</u>



TABLE LU-10. LAND USE ELEMENT IMPLEMENTATION

Ref #	Implementation Action	Agency / Time
<u>3.17</u>	Training for safe practice. Pursue the EPA Renovate Right Program to train local residential contractors for certification as lead renovators to promote safe work practices and prevent lead contamination.	<u>PBA 2022</u>
<u>3.18</u>	Renovations and lead prevention. Evaluate the feasibility of requiring contractor training and/or certification for safe work practices to conduct residential renovations for pre-1978 structures that may contain existing lead paint.	<u>PBA 2022</u>
<u>3.19</u>	Promote health. Partner with local organizations (e.g., OC Health Care Agency, Latino Health Access, Santa Ana Unified School District, and the Coalition of Community Health Centers) to increase blood lead testing, outreach, education, and referral services through a ‘promotora’ or community peer outreach model that addresses the root causes of elevated blood lead levels impacting Santa Ana residents, with special focus in environmental justice communities and for children living in pre-1978 housing.	<u>PBA 2021</u>
<u>3.20</u>	Safe housing. Require all residential rehabilitation projects that use local, or HUD federal funds to comply with the Lead Safe Housing Rule, to remove lead paint hazards, depending on the nature of work and the dollar amount of federal investment in the property.	<u>CDA Ongoing</u>
<u>3.21</u>	Prevention education. Collaborate with local organizations such as Orange County Health Care Agency and State Environmental Protection Agency and identify funds to create a Santa Ana Prevent Lead Poisoning Education Program, with special focus on disadvantaged communities and pre-1978 housing stock.	<u>PBA 2021</u>
<u>3.22</u>	Public health outcomes. Support the Orange County Health Care Agency in their role in investigating public complaints regarding lead hazards, through enforcement of local housing standards to assure healthy outcomes.	<u>PBA 2021 & ongoing</u>
<u>3.23</u>	Agency permits. Work with South Coast Air Quality Management District and Orange County Health Care Agency to evaluate existing special permit process and criteria for approval, and identify potential policy changes to minimize issuance of special permits with potential health impacts.	<u>PBA 2022</u>
<u>3.24</u>	Public health. Partner with Orange County Health Care Agency and community serving organizations to evaluate best practices and benefits of preparing a Public Health Plan to address environmental hazards in Santa Ana, with special focus in environmental justice communities.	<u>PBA 2021</u>
<u>3.25</u>	Engage EJ communities. Work with community serving organizations, neighborhood leaders, and residents to form an Ad Hoc Committee to develop ongoing EJ Community Engagement programs, including multilingual communication protocols.	<u>PBA 2021</u>
<u>3.26</u>	Health conditions. Work with Orange County Health Care Agency and local stakeholders like Orange County Environmental Justice and UC Irvine Public Health to identify baseline conditions for lead contamination in Santa Ana, monitor indicators of lead contamination, and measure positive outcomes.	<u>PBA 2021</u>



TABLE LU-10. LAND USE ELEMENT IMPLEMENTATION

Ref #	Implementation Action	Agency / Time
<u>3.27</u>	Groundwater practice. <u>Coordinate with the State Department of Toxic Substances Control (DTSC) to monitor the Santa Ana Southeast Groundwater Clean Up Project and identify measurable progress to remediate groundwater contamination. Share information with the community on the City's Environmental Quality web page.</u>	<u>PBA</u> <u>2021 & annually</u>
<u>3.28</u>	Tenant protections. <u>Provide information to residential tenants regarding Landlord Tenant Laws in the State, such as AB 1481, that provide protections against evictions for those who seek action to improve substandard housing and hazardous conditions.</u>	<u>PBA</u> <u>2021 & annually</u>
<u>3.29</u>	Development site history. <u>Update the City's Development Review application process to require developers to provide information regarding prior use of the site and history of hazardous materials on the property, to identify potential for site contamination from hazardous materials or soil lead contamination to be remediated.</u>	<u>PBA</u> <u>2021</u>
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