



THE CITY OF SAN DIEGO

## Report to the Planning Commission

DATE ISSUED: April 23, 2024 REPORT NO. PC-24-015  
HEARING DATE: April 30, 2024  
SUBJECT: GENERAL PLAN ENVIRONMENTAL JUSTICE ELEMENT  
OWNER/APPLICANT: CITY OF SAN DIEGO, CITY PLANNING DEPARTMENT

### SUMMARY

Issue: Should the Planning Commission recommend approval of amendments to the General Plan to adopt the Environmental Justice Element?

Proposed Actions: Recommend the City Council to adopt the Environmental Justice Element.

Fiscal Considerations: There are no fiscal impacts associated with this action to the General Fund.

Housing Impact Statement: The Housing Element addresses environmental justice housing concerns related to home location, home quality, and home affordability. Several Housing Element Goals address environmental justice issues, such as substandard living conditions, affordable housing preservation, or improved access to parks, jobs, and schools. The Environmental Justice Element references the Housing Element for goals, policies, and objectives that guide the development of homes and outlines proposed activities to reach overarching goals.

Community Planning Group Recommendation: On March 26, 2024, the Community Planners Committee (CPC) discussed their desire to review the draft Environmental Justice Element. The CPC plans to vote on the item at their next meeting scheduled for April 23, 2024. City staff will provide an update to the Planning Commission once their vote is received.

Environmental Impact: The Environmental Review Section of the City Planning Department completed a California Environmental Quality Act (CEQA) Guidelines Section 15162 consistency evaluation in compliance with Public Resources Code Section 21166 for the Environmental Justice Element (see attachment 1). The City Planning Department has determined that the addition of an Environmental Justice Element to the General Plan would not result in new significant impacts or an increase in severity in the identified impacts over and above those disclosed in the previously certified Final Program Environmental Impact Report (EIR) and addenda to the EIR for the 2008 General Plan (EIR No. 104495/SCH No. 2006091032) and the Final Program EIR and addenda for the City of San Diego Climate Action Plan (CAP) (EIR No. 416603/SCH No. 2015021053).

### BACKGROUND

The State of California defines environmental justice as:

*"[T]he fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies."*

California Government Code Section 65040.12(c)

Addressing environmental justice has been a key focus for the City of San Diego, evidenced by its integration throughout various planning documents including the General Plan. The City has taken significant strides toward advancing environmental justice through policy adoption, recently amending the Housing, Recreation, and Public Facilities, Services, and Safety Elements with an emphasis on investing in areas with the greatest need and greatest amount of growth. Including the Environmental Justice Element in the General Plan reinforces the City's commitment by acknowledging areas most affected by environmental challenges and identifying pathways for action.

Senate Bill 1000 (SB 1000), Planning for Healthy Communities Act, was adopted in 2016 and requires local governments to address environmental justice issues in their General Plan. The element must include environmental justice goals, policies, and objectives to reduce unique or compounded health risks throughout the city, with special attention on disadvantaged communities and address the following eight topics:

- Reducing pollution exposure;
- Promoting public facilities;
- Promoting food access;
- Promoting safe and sanitary homes;
- Promoting physical activity;
- Reducing unique or compounded health risks;
- Promoting civic engagement; and
- Prioritizing the needs of disadvantaged communities.

Adoption of the Environmental Justice Element into the City's General Plan will meet the requirements of SB 1000 by highlighting and expanding upon existing policies throughout the plan related to topic areas in one central location. The Draft Environmental Justice Element strives to uphold existing high-quality public spaces and amenities while creating the space for more inclusive practices that foster a San Diego where all community members have equal access and opportunities, regardless of where they live in the City. The Environmental Justice Element is included as Attachment 2.

## DISCUSSION

### **What is the purpose of the Environmental Justice Element?**

The purpose of the Environmental Justice Element is to identify and develop goals, policies and actions to reduce unique or compounded health risks in our City with a focus on disadvantaged communities. This Environmental Justice Element focuses on reducing pollution exposure and improving air quality, and promoting public facilities, food access, safe and healthy homes, and physical activity. To better address community needs, this Element also encourages and supports

inclusive public engagement in City decisions. The Environmental Justice Element was prepared in coordination with Blueprint SD, which will amend the General Plan to remove existing sections and policies folded into the new Element. Together, these efforts work to advance environmental justice across the city and improve the quality of life for all San Diegans.

### **How will the new Environmental Justice Element support environmental justice?**

Varied development patterns within a city can lead to unequal impacts in communities. Development that generates jobs and enriches a community in many ways, may also increase air pollution in the surrounding communities. An absence of development can also negatively affect a community. A lack of grocery stores in a community can limit access to healthy food, which has been linked to increased obesity rates and poorer health outcomes. Communities have suffered – and continue to suffer – more from the adverse effects of varied development patterns by carrying a more significant and disproportionate burden of the associated health risks. The Environmental Justice Element is intended to address the imbalances in our communities caused by past discriminatory actions that have resulted in segregated development patterns, inequitable investment and disparate outcomes.

Several intersecting and overlapping factors have impacted patterns of segregation and integration over the course of the City's history. These factors include white flight; housing costs; access to well-paying jobs and economic mobility; racially and economically restrictive covenants within real estate deeds; redlining; discriminatory real estate practices; zoning; freeway construction; ballot initiatives; and public resistance to increased housing and density. These factors are discussed in greater detail in the appendices to the Housing Element.

Environmental justice, when action is taken, ensures that people of all races, cultures, and incomes are equally and equitably valued, protected, and served. This includes policies and regulations that affect the quality of the environment, such as mobility, parks, open space, public space, public services, and use of land. Environmental Justice will be a new element added to the General Plan and will be applied citywide to further the City's efforts to advance the equitable distribution of benefits and limit environmental burdens to create healthy and livable communities for all San Diegans.

### **What is included in the Environmental Justice Element?**

The Environmental Justice Element includes goals that envision a more equitable future, policies that inform City decision-making, proposed activities that build on existing programs to advance environmental justice, and a description of areas of the City most impacted by environmental burdens and associated health risks – collectively known as Environmental Justice Communities (EJ Communities).

Sections within the proposed element work to advance environmental justice across the City of San Diego include:

**Inclusive Public Engagement in City Decisions**—Building awareness around City initiatives and programming is vital to gathering input and supporting community members in becoming familiar with existing policies and programs, which can translate to more

meaningful engagement. Policies in this section emphasize sharing information in a user-friendly manner, facilitating access to participation opportunities, and ensuring representation. Proposed actions include seeking funding to enhance engagement activities, strengthening feedback mechanisms to effectively communicate progress, and providing training for all City Departments to implement the Inclusive Public Engagement Guide in collaboration with the Office of Race and Equity.

**Pollution Exposure and Air Quality** - Environmental pollution can affect quality of life and a person's mental and physical well-being by heightened risks of strokes and respiratory ailments like asthma that can ultimately lead to shorter life expectancy. Safeguarding natural resources against degradation is necessary to preserve human health and welfare. This section emphasizes the urgency of reducing harmful emissions, particularly in communities already bearing the brunt of environmental burdens, to enhance health outcomes. The proposed actions involve conducting a future study to assess the economic and environmental effects of incompatible industrial activities near residential areas and sensitive facilities, alongside revising the Urban Forestry 5-Year Look Ahead Plan to bolster pollution mitigation efforts Citywide for a healthier environment.

**Active Play** - Access to safe and enjoyable public spaces, well-lit streets, and reliable public transit enhances opportunities for individuals to integrate physical activities into their daily routines, promoting both physical health and mental well-being. Policies in this section promote connectivity, accessibility, safety and activation of public spaces that build on those found in the Recreation, Mobility, and Public Facilities, Services and Safety Elements. Proposed activities include a Child-Friendly Public Spaces Design Guide, a Parks Need Index, and a Citywide Trails Master Plan.

**Promoting Healthy Food Access** - Many components make up a healthy food system. Policies in this section promote healthy food consumption and security through a multifaceted policy approach, focusing on improving the availability, access, and affordability of fresh and healthy food options and reducing single-use plastic waste in food packaging. Proposed actions encourage maintaining a supermarket needs index to promote their presence in underserved areas, as well as educating community members on urban farming, creating community gardens, and waste reduction to foster a healthy food system.

**Safe and Healthy Homes** - Location, quality and affordability of homes play a vital role in fostering comfortable and secure living environments for all ages. The Environmental Justice Element points to the Housing Element for goals, policies, and objectives that guide the development of homes. Proposed actions in this section include incentivizing middle-income housing, exploring various models for affordable housing, developing an Affordable Home Development Master Plan on City-owned land, improving indoor air quality through building decarbonization, and enforcing and expanding lead hazard prevention measures to protect public health.

**Climate Change and Resilience** - Climate change is giving rise to extreme weather conditions that impact well-being, safety and overall health across the City, such as flooding,

wildfires, and extreme heat; however, some neighborhoods bear a heavier burden and possess fewer resources to cope with and respond to these challenges. To safeguard the city's most vulnerable populations, such as children, seniors, and individuals with disabilities, it is essential to address climate vulnerabilities, especially within EJ Communities. The Environmental Justice Element points to policies in the Public Facilities, Services, and Safety Element and Conservation Element that address climate change. These policies are supported by the CAP and Climate Resilient SD, which outline the strategies for readiness, adaptation, and the reduction of greenhouse gas emissions responsible for climate change. Proposed actions in this section focus on climate resilience through heat mitigation, urban greening, green infrastructure, building decarbonization incentives, assembling advisory boards, community engagement, and pursuing grant funding.

**Public Facilities and Infrastructure Prioritization** - Infrastructure is not just the physical structures that surround us, it is the essential fabric that connects us to opportunity. Within the City, there are disparities by race and income across communities due to the influence of infrastructure on health and quality of life. The policies in this section build on the Public Facilities, Services, and Safety Element and are complemented by Council Policy 000-32, which sets guidelines for engaging with community members to gather input on infrastructure, and Council Policy 800-14, which sets guidelines on prioritization of public infrastructure across the City. Together, the infrastructure investment is prioritized through an equitable framework in areas with the greatest needs, and public input on infrastructure needs is tailored to be gathered more inclusively and meaningfully from people of all ages, abilities and communities. Proposed actions involve developing a Park Needs Index, identifying areas for safe walking/rolling, biking, and transit opportunities, enhancing coordination with community-based organizations, and developing a streamlined process for efficient implementation of community-led projects.

### **Environmental Justice Communities**

Environmental Justice Communities (EJ Communities) are areas of the City most impacted and negatively affected by environmental burdens and associated health risks. An initial Environmental Justice Screen was conducted to inform the selection of Environmental Justice Communities within the City. This exercise was informed by the CalEnviroScreen 4.0 tool developed by the California Office of Environmental Health Hazard Assessment, the Climate and Economic Justice Screening 1.0 tool developed by the Council on Environmental Quality within the Executive Office of the President, and additional local data to supplement these tools concerning Food Apartheid and Heat Indicators. The identified Environmental Justice Communities have been further informed by the lived experiences of people across the city and have helped refine and expand upon findings from the data analyzed (see attachment 3).

- The CalEnviroScreen Tool 4.0 maps potential exposures to pollutants and adverse environmental conditions caused by pollution. The tool utilizes environmental, health, and socioeconomic information to score every census tract in the state to inform pollution burdens. Communities in the top 25% of the CalEnviroScreen 4.0

tool and at or below the state average median income are represented in EJ Communities.

- The Climate and Economic Justice Screening Tool (CEJST) 1.0 - Utilizing similar metrics as the CalEnviroScreen 4.0 tool incorporates additional housing and climate indicators and considers tribal lands.
- Climate and Resilience Map 1 – Showing the intersections between areas where households commonly spend a larger portion of their income on home energy costs (e.g., electricity and natural gas) and those with a lower Tree Canopy and a higher Heat Risk.
- Food Apartheid Map 2 - Showing areas where a higher percentage of the population suffering from diabetes and obesity intersects with higher percentages of the population participating in the Supplemental Nutrition Assistance Program (SNAP).

Table EJ-1 shows what percentage of each Community Plan Area is identified as EJ Communities.

Community Plan Area	Percent EJ Communities
Barrio Logan*	100%
San Ysidro	100%
Mid-City: City Heights	93%
Southeastern San Diego	88%
Encanto Neighborhoods	82%
Downtown	60%
Otay Mesa-Nestor	58%
Mid-City: Kensington-Talmadge	50%
Skyline-Paradise Hills	42%
Mid-City: Eastern Area	33%
Linda Vista	29%
Mira Mesa	27%
Greater Golden Hill	25%
Midway-Pacific Highway	25%
College Area	17%
Rancho Bernardo	11%
San Pasqual	11%
Uptown	8%

*\*Excludes military land in the planning area*

**Why is addressing environmental justice important?**

The City has made efforts to advance environmental justice and many environmental justice-related policies have already been adopted by the City Council, including recent amendments to the General

Plans Housing, Public Facilities, Services and Safety, and Recreation Elements, as well as the City's Climate Action Plan, Climate Resilient SD, and Parks Master Plan. Furthermore, funding sources have been identified to supplement resources available to accelerate the implementation of projects that advance climate justice, resilience, and adaptation in disadvantaged communities. This Environmental Justice Element is proposed to be specifically added into the General Plan to call out its importance but is not intended to replace other environmental justice policies throughout the General Plan and other City plans and policies. This Element is rather intended to supplement already existing plans and policies.

However, despite prior efforts, more must be done. EJ Communities experience unique challenges, such as proximity to the international border, freeways, and other maritime industrial uses, and industrial uses not related to maritime or port facilities. Areas surrounding the Chollas Creek Watershed also experience unique challenges, confronting flooding and concerns of pollution. The Environmental Justice Element becomes even more critical in addressing and rectifying these imbalances. Major emergency events serve as a stark reminder of the urgent need to prioritize equitable development and environmental justice to ensure that all communities, regardless of their development patterns, are resilient in the face of environmental challenges.

#### **How did the public inform the Environmental Justice Element?**

To inform the Environmental Justice Element, it was not only important to hear from as many community members, including individuals and businesses, as possible but also to capture feedback from a diverse group of people representative of the demographics of our City, particularly in EJ Communities. Throughout the latter part of 2023, City Planning staff worked with five community-based organizations (CBOs) – selected through an open process – to reach community members in areas most impacted by compounded health risk. These organizations included the Bayside Community Center, Bikes del Pueblo, Casa Familiar, City Heights Community Development Corporation, and the Urban Collaborative Project – reaching communities such as Linda Vista, Southeastern San Diego, Logan Heights, City Heights, and San Ysidro. Utilizing various engagement tactics, including clean-up events, walk audits and bike rides, workshops and meetings, as well as pop-up events, the team was able to connect with community members at places and events in their neighborhoods. A full summary of outreach and engagement efforts can be found on the [project website](#).

Additionally, prior to these engagement activities, City Planning staff reviewed and summarized feedback collected across 8 previous initiatives to inform engagement and ensure that questions asked were able to further inform environmental justice priorities. In addition, staff interviewed leaders of community-led projects and programs advancing environmental justice to learn more about the impetus for these projects and the needs they met in the community. These interviews resulted in six case studies showcasing ongoing work within the City of San Diego and informing the types of programs that already support and enrich communities. A [story map showcasing case studies](#) can be found on the project website.

To mark the beginning of in-person events, the City of San Diego held a kick-off workshop at the Ocean Discovery Institute in August of 2023. This was the first of 5 workshops led by City Planning staff and 40 engagement events held in partnership with CBOs.

- **3 Clean-up events** provided the space to hear about how comfortable walking spaces, clean environments, and homeless services can support the health and well-being of San Diegans.
- **5 Walk Audits and Bike Rides** opened the door to tour projects that community members have advocated for and help address environmental justice issues. These pit stops prompted conversations about promoting physical activity and prioritizing infrastructure where the needs are greatest. Across all events, community members shared a desire for homes to connect to jobs, affordable healthy food, and places to recreate.
- **16 Pop-up events** were organized to meet community members at existing events they already planned to attend and make it easy to capture priorities around various environmental justice issues.
- **23 Meetings and workshops** provided an overview of environmental justice issues to audiences at senior centers, parent groups, established meeting groups, high schools, and local community venues. At visioning workshops, participants were asked to work in teams of 4-6 people and partake in a hands-on activity to build a safe, healthy and inclusive San Diego using craft materials that foster creativity and limit barriers to imagining a brighter future. Each team was given the opportunity to share with the group what they built and why, while at the same time, facilitators took notes to capture what was being shared. Participants reviewed notes taken as a group and collectively identified reoccurring themes that emerged from the exercise. Workshops such as these allowed us to ensure a diverse group of voices informed the draft Environmental Justice Element.

Overall, a total of 47 events were held, and we heard from 1,473 community members. The Environmental Justice Element considers input from community members and focuses on reducing pollution exposure, improving air quality, and promoting public facilities, food access, safe and healthy homes, and physical activity. To better address community needs, this Element also encourages and supports inclusive public engagement in City decisions. Together, these efforts advance environmental justice across the City and improve the quality of life for all San Diegans.

City of San Diego Strategic Plan:

This action relates to the Strategic Plan's Operating Principle of Equity and Inclusion by reducing unique and compounded health risks to ensure the quality of life no matter where you live in the City.

The action relates to the following Priority Areas:

- **Protect and Enrich Every Neighborhood** – Includes policies and strategies aimed at fostering cleaner air, high-quality public spaces, safe and healthy homes, and other essential elements crucial for building vibrant communities within traditionally underserved areas.
- **Champion Sustainability** – Promotes reducing pollution exposure and advancing safe and sanitary homes to further support a built environment that best sustains our natural environment and public health.
- **Foster Regional Prosperity** - Promotes the development of interconnected and flourishing communities in a fair and equitable manner, aiming to establish a livable city for all San



Diegans, regardless of their socio-economic status. This approach supports workers across all levels, thereby contributing to a resilient local economy.

Conclusion:

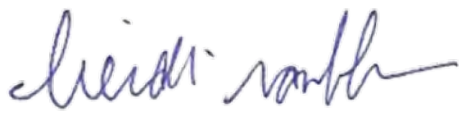
To advance environmental justice issues across the City, this Element sets goals, objectives, and policies categorized by the following topics:

- A. Inclusive Public Engagement in City Decisions
- B. Pollution Exposure and Air Quality
- C. Active Play
- D. Promoting Healthy Food Access
- E. Safe and Healthy Homes
- F. Climate Change and Resilience
- G. Public Facilities and Infrastructure Prioritization.

While this Element applies Citywide, special attention is needed in EJ Communities to advance climate, equity, and sustainability goals. The identification of EJ communities is important in terms of implementing the City's vision of prioritizing investments in the areas of greatest needs. From an environmental justice perspective, EJ communities are the areas of the City with the greatest needs for investments to reverse environmental injustices. EJ Communities are also areas that can be prioritized for federal or state funding.

Ongoing implementation and monitoring will be critical to achieving the goals of this EJ Element. Through regular General Plan monitoring, the City will be able to report on, and adjust policies, objectives, and proposed activities based on ongoing community feedback, availability of new information, or changes in circumstances. Therefore, staff recommends that the Planning Commission recommend to the City Council the adoption of the Environmental Justice Element as presented.

Respectfully submitted,



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Attachments:

1. City Planning Department CEQA Consistency Memo dated 4/10/24.
2. Draft Environmental Justice Element
3. Draft Environmental Justice Communities Map