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& Transportation
Department**

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Memo

To: Housing and Human Concerns Committee and Planning Commission
From: Diana O'Dell, Principal Planner and Alin Lancaster, Housing Leadership Manager
Date: January 25, 2022
Re: Environmental Justice Element and Safety Element

Background

The mandatory update to the Housing Element and related updates to the Land Use Element trigger state requirements to create or amend other General Plan Elements (Government Code § 65302).

- **Environmental Justice** - In 2016, Government Code § 65302 was amended to require cities to adopt an Environmental Justice (EJ) Element or EJ related goals, policies, and objectives integrated in other elements, that identifies “disadvantaged communities” within the area covered by the general plan, if the city, county, or city and county has a “disadvantaged community.” This law is triggered if the city is updating two or more elements concurrently on or after January 1, 2018.
- **Safety Element** - Cities must review and update their Safety Element to meet certain requirements concurrently with the Housing Element update. The Safety Element must be reviewed and updated to address wildfire, seismic, geologic and flood risks. Climate adaptation and resiliency strategies are also considered.

Environmental justice affects both land use planning and housing and human services, and staff is requesting Planning Commission and Housing and Human Concerns Committee feedback on draft goals and policy approaches. In addition, the Planning Commission is required to review and, if necessary, revise the Safety Element upon each revision of the Housing Element. This study session will provide an overview of these topics and draft policies for input and feedback from the Commissioners and Committee members.

Public notice of the study session was provided through the distribution of 250 Spanish-language flyers and 250 English-language flyers at the Fair Oaks Community Center, Senior Center, Downtown Library, Schaberg Library and Redwood Shores Library. Multiple electronic notices were sent in English and Spanish to the Housing Element email list and Housing Newsletter email list. Notice was published on the project website (www.welcomehomerwc.org) and the City's website.

Environmental Justice Element

The State of California defines environmental justice as “the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies.” (Gov't Code § 65040.12(e)). Recognizing that the planning profession has power to influence health and equity outcomes across communities, lawmakers passed SB 1000, adding the Environmental Justice Element to the required elements of the General Plan, in order to integrate environmental justice principals into the planning process and improve public participation. Fair treatment means that no group of people should bear disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations and policies.

Environmental Justice (EJ) Communities - For an Environmental Justice Element, the term “disadvantaged communities” include low-income areas that are disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation. Redwood City will use the term “environmental justice (EJ) community” as the term for “disadvantaged community” that is defined in California law (Government Code 65302(h)(4)(A)). California law requires local governments to identify any environmental justice communities that exist within the area covered by the City's General Plan. Typically, the environmental justice communities are identified through an application called CalEnviro Screen. CalEnviro Screen measures the degree of pollution burden and other population characteristics, with communities that are in the 75th percentile of scores considered of high concern. While the final analysis identifies two census tracts as qualifying as environmental justice communities, the City is addressing a total of three census tracts due to the concerns with pollution burden, health, education and poverty scores (See Map in Attachment 1). This third census tract, Tract 6105.00, is primarily located in the unincorporated area but is within the City's sphere of influence.

Technical Memorandum - A Technical Memorandum was prepared to evaluate the existing conditions related to environmental justice, and is available on the project website (www.welcomehomerwc.org). Environmental justice policies will be looking to lessen pollution burdens and improve population characteristics such as health conditions, unemployment and poverty while continuing to sustain and improve residents healthy living opportunities.

Outreach- As part of this work, the City has been partnering with community organizations to collect community input on environmental justice. On Wednesday, December 8, 2021, Redwood City staff and the City's consultant, MIG, partnered with United through Education: Familias Unidas and hosted a virtual all-Spanish speaking focus group to discuss environmental justice needs in Redwood City. With an attendance of 26 community members, concerns were expressed regarding:

- Lack of affordable housing,
- Too much pollution, and
- Long wait times for scheduling medical care.

Residents also discussed the desire for more trees and green infrastructure, housing assistance programs, nutritional assistance programs, and partnerships with local organizations and groups. Many participants emphasized their appreciation in the City's ability to make Spanish-speaking residents and community members feel welcomed and considered in the City's planning efforts. In addition, participants shared that Redwood City is a very service-oriented community and community organizations serve a very important role in making them feel heard. A complete summary of the meeting presentation and notes is available on the project website at www.welcomehomerwc.org. Staff will be conducting additional outreach when the draft Element is ready for public review.

Goals and Policies - Based on the technical memorandum and community feedback, staff and the consultant have drafted some possible high-level goals, objectives and policy approaches that will address these concerns. Based on the discussion by Planning Commission and Housing and Human Concerns Committee and additional community feedback, staff will develop a complete set of goals, objectives and policies.

EJ Goal #1: Minimize public health and environmental impacts of hazardous or solid waste and groundwater threats in environmental justice communities.

Objectives

- Prohibit development of new hazardous or solid waste facilities in environmental justice communities.
- Reduce the impact of existing hazardous or solid waste facilities and groundwater threats in environmental justice communities.
- Prevent new groundwater threats in environmental justice communities.

Policy Approaches

- Use land use regulations or other ordinances to ensure that new facilities that use, store, or handle hazardous materials, hazardous waste, or solid waste are only located in environmental justice communities, if they meet current zoning regulations and provide a safe distance from sensitive uses such as schools, residences, and public community facilities.
- Partner with the County and other regulatory agencies to ensure that existing hazardous and solid waste facilities meet health and safety standards in or near environmental justice communities.

- Partner with the County and other regulatory agencies to ensure that the necessary steps are taken to clean up residual hazardous waste and to minimize groundwater threats as development occurs on any contaminated sites in environmental justice communities.

EJ Goal #2: Reduce traffic density, and improve air quality and safety in environmental justice communities.

Objective

- Increase active transportation, reduce motor vehicle miles traveled, and improve bicyclist and pedestrian safety in and around environmental justice communities.

High Level Policy Approaches

- Plan patterns of land use and development to create complete neighborhoods where residents of environmental justice communities can meet their daily needs through active transportation.
- Prioritize capital improvement projects that support increased non-motorized and sustainable modes of transportation in environmental justice communities.
- Invest in and design transportation infrastructure to improve safety in environmental justice communities, especially for vulnerable road users such as pedestrians, bicyclists, children, seniors, and people with disabilities.
- Continue to implement the Climate Action Plan.

EJ Goal #3: Promote and facilitate physical activity in environmental justice communities.

Objectives

- Maintain and improve parks and other recreational facilities within environmental justice communities.
- Create routes that make it safe, easy, and enjoyable to walk or bike to parks, other recreational facilities, and schools within environmental justice communities.
- Also see EJ Goal #2.

High Level Policy Approaches

- Prioritize activities and investments that will increase the tree canopy in environmental justice communities.
- Ensure adequate park space, including pocket parks and other recreational facilities, in environmental justice communities by identifying potential sites for new publicly funded parks and recreational facilities.
- Ensure park maintenance and improvement funds are equitably distributed to parks and other recreational facilities in environmental justice communities.
- Also see high level policy approaches under EJ Goal#2.

EJ Goal #4: Produce and preserve affordable housing and protect renters.

EJ Objectives

- Plan for, permit, incentivize, and reduce barriers to the production of a range of housing types at a range of affordability levels in neighborhoods throughout the City.
- Ensure that both new and existing housing in environmental justice communities is safe and habitable.
- Promote fair housing and protect renters in environmental justice communities from discrimination and displacement.

High Level Policy Approaches

- Continue existing code enforcement program to address substandard housing.
- Continue the City's minor home repair and accessibility grant programs.
- Implement the City's Anti-Displacement Strategy, once adopted, that addresses displacement, tenant protection policies, and affordable housing preservation.
- Distribute funds in order to prioritize engagement, education, linkage to, and provision of housing support services (delivered by the City and its partners) to residents in environmental justice communities.
- Fulfill other Housing Element goals of protecting and preserving affordable housing.

EJ Goal #5: Partner with County Health organizations to improve health outcomes for environmental justice communities.

The City will work with County Health to identify appropriate policy objectives and approaches.

EJ Goal #6: Promote civic engagement in public decision-making processes that affect environmental justice communities.

Objectives

- Center the participation of and input from EJ community residents in policy decisions that impact their communities.

High Level Policy Approaches

- Implement the [2021 Redwood City Equity Plan](#) recommendations.
- Continue to increase the meaningful input from EJ community residents, community organizations, and stakeholders engaged in policy processes that impact their communities.
- To build accountability and ensure that policy decisions are responsive to input received from EJ community residents; review decision-making processes (such as policy adoption, project approval, and annual budgeting) and establish formal steps where the City considers these viewpoints.

Staff Recommendation: Provide comments on goals, objectives, and high level policy approaches for the Environmental Justice Element.

Format – The Office of Planning and Research (OPR) for the State of California provides guidance on the construction of the EJ Element. Per their guidance, cities “may address EJ by creating a new stand-alone EJ Element or integrating EJ as a cross-cutting topic throughout their general plan. Some jurisdictions may choose to pursue a hybrid approach that does both. A separate EJ Element may make it easier for the public and decision-makers to see EJ policies in one place and help demonstrate a jurisdiction’s commitment to EJ. Alternatively, an integrated approach allows for EJ issues to be incorporated into policies throughout elements that are already required to address EJ-related topics. Examples of an integrated approach include addressing the reduction of pollution exposure in both the Circulation and Land Use Elements; promoting physical activity or improving access to safe and affordable drinking water in both the Conservation and Open Space Elements; or addressing the protection of vulnerable and environmental justice communities from natural and climate change induced hazards such as wildfire, extreme heat, flooding, and drought in the Safety Element.” (Page 7 of the [OPR’s Guidance on Environmental Justice Elements](#)).

Staff Recommendation: The EJ Element discussion and policies be integrated across topics to reinforce the connected nature of these policies with other City goals.

Safety Element

Staff has prepared draft safety policies regarding wildfire risk and evacuations in Redwood City. The Safety Element must also address risks beyond wildfire risk, and staff and the consulting team are continuing to develop the analysis and policy recommendations to address those risks. For this memo, staff is focusing on the proposed goal and policies associated with wildfire risk.

Redwood City has not experienced a significant wildfire event in decades, but several communities in the Bay Area and broader Northern California have a history of significant wildfire incidents. The CZU Lightning Complex fires occurred in August 2020 and consisted of several wildfires in San Mateo and Santa Cruz counties. The fires burned 86,509 acres causing the destruction of 1,490 buildings and significant damages to Butano and Big Basin Redwoods state parks.

Wildfire risk throughout the State is increasing due to climate change, because of higher temperatures and longer dry periods. According to Cal-Adapt, the State’s climate projection tool, temperatures, drought, and wildfire occurrence are expected to increase significantly by the middle of the 21st century. Planning for fire-adapted communities can ensure they are more resistant to future wildfire threats and have the capacity to respond to wildfire emergencies.

For evacuations, Redwood City Police and Fire Departments have implemented San Mateo County’s [Zonehaven](#) evacuation system. Zonehaven determines the most efficient and effective evacuation routes based on the emergency type and location. Below are the new draft goal and related policies regarding wildfire risk.

CalEnviroScreen 4.0 Percentile Scores