

## 4.7 Environmental Justice

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This section evaluates potential impacts to environmental justice communities from development facilitated by the proposed 2022 RTP/SCS.

### 4.7.1 Setting

#### a. Overview

Environmental justice (EJ) is defined in the California Government Code as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies” (Gov. Code § 65040.12 (e)). In May 2012, the California Attorney General’s office released a report titled “Environmental Justice at the Local and Regional Level – Legal Background” which interprets CEQA to include considerations of environmental justice, although environmental justice is not explicitly mentioned in the CEQA guidelines. The report defines “fairness” in this context to mean that “the benefits of a healthy environment should be available to everyone, and the burdens of pollution should not be focused on sensitive populations or on communities that already are experiencing its adverse effects.”

In the transportation context, environmental justice seeks to ensure that underserved communities are involved in transportation planning and decision-making, benefit equitably from transportation plans and investments, and do not suffer disproportionate burdens from any adverse impacts. Prior to environmental justice emerging as a regulatory issue, the issues underlying environmental justice emerged in the Civil Rights movements and are reflected in Title VI of the Civil Rights Act. In 1994, President Bill Clinton signed Executive Order 12898 -- Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which became effective on February 11, 1994. The Executive Order directs every federal agency to make environmental justice part of its mission by identifying and addressing the effects of all programs, policies, and activities on minority and low-income populations. Hence, the U.S. Department of Transportation (DOT) issued its own order, 5610.2(a), to clarify and reinforce environmental justice policies related to transportation planning. The Federal Highway Administration (FHWA), a branch of the DOT, has established policies for integrating environmental justice principles into existing operations. There are three main elements to FHWA’s environmental justice policy:

- Avoid, minimize, or mitigate disproportionately high and adverse human health or environmental effects, including social and economic effects on minority and low-income populations;
- Ensure full and fair participation by all potentially affected communities in the transportation decision-making process; and
- Prevent reduction or significant delay in the receipt of benefits by minority populations and low-income groups.

Issues of environmental justice impact low-income populations; minority individuals and populations; and low-mobility populations, and may include, but are not limited to concerns related to health and safety, economic development, society and culture, accessibility, and the natural environment. These populations are discussed further below.

Minority populations are further defined by the guidance document prepared by the Council on Environmental Quality (CEQ) titled *Environmental Justice: Guidance Under the National Environmental Policy Act* (CEQ 1997). In that document, CEQ defines “minority persons” as “individuals who are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black (not of Hispanic origin; or Hispanic” (CEQ 1997). Hispanic or Latino refers to an ethnicity whereas American Indian, Alaskan Native, Asian, Pacific Islander, and Black/African American (as well as White or European American) refers to racial categories; thus, for Census purposes, individuals classify themselves into racial categories as well as ethnic categories, where ethnic categories include Hispanic/Latino and non-Hispanic/Latino. The 2020 U.S. Census allowed individuals to choose more than one race. For this analysis, consistent with guidance from CEQ (1997), “minority” refers to people who are Hispanic/Latino of any race, as well as those who are non-Hispanic/Latino of a race other than White or European-American. While “Other” is quantified, it is not factored into the analysis of concentrations of minority population.

**b. Demographics**

The SJCOG region contains seven incorporated cities: Escalon, Lathrop, Lodi, Manteca, Ripon, Stockton, and Tracy. In 2020, approximately 41.2 percent of the SJCOG region population was concentrated in the City of Stockton, with the next most populous cities being Tracy (11.9 percent) and Manteca (10.7 percent). The County also contains other census-designated places and

Table 4.7-1 summarizes the racial and ethnic composition for communities within the SJCOG region. Table 4.7-2 summarizes median income, households below poverty level, and unemployment rates for communities within the region.

**Table 4.7-1 Racial and Ethnic Composition of the SJCOG Region (2020)**

Location	White	Black	American Indian	Asian	Pacific Islander	Two or More Races	Hispanic or Latino	Minority
California	36.5%	5.4%	0.3%	14.6%	0.3%	3.4%	39.1%	63.5%
SJCOG Region (All San Joaquin County)	30.7%	6.8%	0.2%	15.5%	0.6%	4.3%	41.7%	69.3%
<b>Incorporated Cities</b>								
Escalon	74.4%	0.3%	0.0%	0.8%	0.4%	7.3%	16.8%	25.6%
Lathrop	23.2%	6.1%	0.0%	26.0%	0.5%	3.9%	40.1%	76.8%
Lodi	45.8%	1.4%	0.1%	10.8%	0.4%	3.6%	37.8%	54.2%
Manteca	39.0%	4.1%	0.4%	10.9%	1.3%	3.8%	40.4%	61.0%
Ripon	65.6%	0.4%	0.0%	2.4%	0.0%	4.2%	26.9%	34.4%
Stockton	19.4%	11.0%	0.2%	20.5%	0.5%	4.6%	43.5%	80.6%
Tracy	28.8%	5.1%	0.1%	17.2%	1.1%	5.4%	42.1%	71.5%
<b>Census-Designated Places (CDP)</b>								
August	15.6%	1.6%	0.0%	3.1%	0.2%	2.5%	76.9%	84.4%
Country Club	33.5%	6.2%	0.1%	4.7%	0.0%	2.7%	52.7%	66.5%
Garden Acres	16.1%	0.9%	0.5%	0.2%	0.3%	0.3%	81.8%	83.9%

Note: “Hispanic” is defined as an ethnicity while the other categories are races. To prevent double counting, persons whom identified themselves as Hispanic were excluded from racial population counts, but comprise a portion of the total minority population. Minority populations plus the population identifying as white comprise 100 percent of the SJCOG region.

Source: U.S. Census Bureau 2022a

**Table 4.7-2 Income and Poverty Rate in the SJCOG Region (2020)**

Location	Median Household Income	Poverty Rate All People	Percent Unemployed
California	\$78,672	12.6%	10.3%
SJCOG Region (All San Joaquin County)	\$68,628	13.7%	11.6%
Escalon	\$64,844	9.6%	11.5%
Lathrop	\$90,179	11.5%	11.8%
Lodi	\$64,153	14.7%	10.4%
Manteca	\$76,846	10.2%	10.1%
Ripon	\$89,110	6.5%	5.8%
Stockton	\$58,393	16.8%	13.2%
Tracy	\$95,741	8.6%	9.9%
August	\$34,781	26.9%	9.6%
Country Club	\$57,391	15.6%	16.3%
Garden Acres	\$46,276	18.4%	14.9%

Sources: U.S. Census Bureau 2022b; Employment Development Department (EDD) 2020

As shown in Table 4.7-1, approximately 69.3 percent of SJCOG region residents, or 520,869 persons, were identified as being a minority race or ethnicity (U.S. Census Bureau 2022a). The largest minority group in the SJCOG region is Hispanic (41.7 percent) followed by Asian (15.5 percent). As shown Table 4.7-2 the median income for the SJCOG region was \$68,628, the poverty rate was 13.7 percent, and the unemployment rate was 11.6 percent (U.S. Census Bureau 2022b; EDD 2020). The 2020 State median income was \$78,672 and the poverty rate was 12.6 percent (U.S. Census Bureau 2022b). EDD statistics identify a 5.5 percent unemployment rate in California as of 2022 (EDD 2022).

## EJ Communities

EJ communities in the SJCOG region were identified using socioeconomic data provided by the American Community Survey (ACS) Five-Year Estimates for 2020 (U.S. Census Bureau 2022b). For the purpose of this analysis, two socioeconomic indicators were considered in identifying EJ communities: minority population and households living in poverty. Minority persons are those who identify as Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or Other Pacific Islander, some other race, multiple races, or Hispanic/Latino of any race. Non-minority persons are those self-reporting as white and not of Hispanic/Latino ethnic origin. The Census defines poverty thresholds for each year based on the size of a family and number of children under 18 years old. As such, the Census poverty threshold varies. For example, for 2020, the Census poverty threshold for one person under age 65 with no children was \$13,465, while for a family of four with two children the threshold was \$26,246 (Census 2022c).

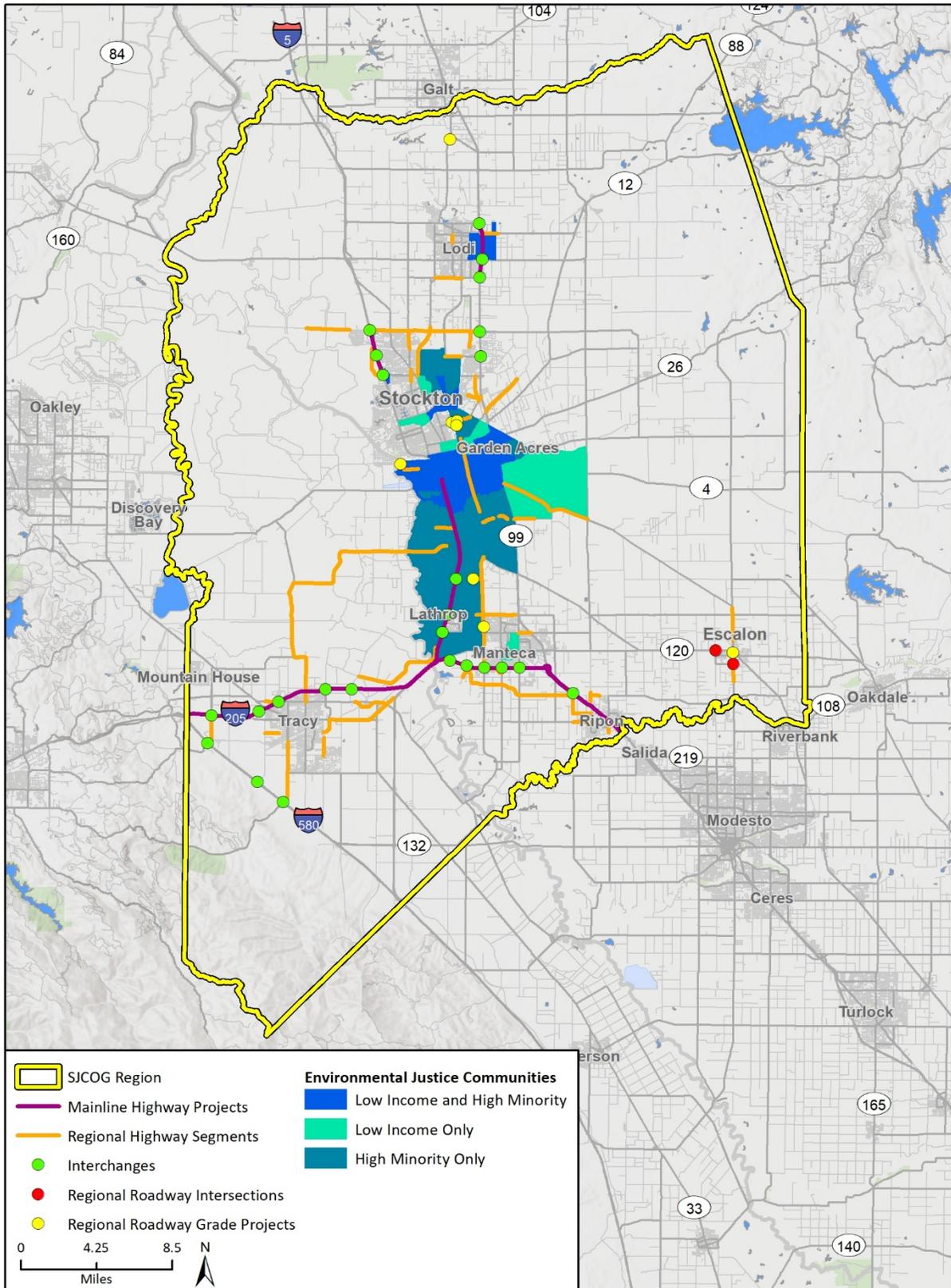
For the purposes of the proposed 2022 RTP/SCS, EJ communities were mapped by SJCOG using the following criteria (SJCOG 2022a):

- Census tracts with at least 40 percent of the population living at or below 150 percent of the federal poverty level as defined by the Census Bureau.

- Census tracts where at least 80 percent of population is minority. The U.S. Census definition was used for minority persons.

Figure 4.7-1 shows the identified EJ communities within the SJCOG region.

**Figure 4.7-1 EJ Communities in the SJCOC Region**



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 Additional data provided by San Joaquin Council of Governments, 2022.

Fig X Demographic Index 20220616

## 4.7.2 Regulatory Setting

### a. Federal Laws, Regulations, and Policies

#### Executive Order 12898

Executive Order 12898, established in 1994, directed federal agencies to (1) identify and address disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, (2) develop a strategy for implementing environmental justice, and (3) promote nondiscrimination in federal programs that affected human health and the environment, as well as provide minority and low-income communities access to public information and public participation. This executive order established an interagency working group on environmental justice chaired by the Environmental Protection Agency.

#### Executive Order 14008

Executive Order 14008, signed in January 2021, created the White House Environmental Justice Advisory Council and the White House Environmental Justice Interagency Council. The order directs agencies to develop programs, policies, and activities to address disproportionately high and adverse human health, environmental, climate-related, and other cumulative impacts on disadvantaged communities. Executive Order 14008 also established the Justice40 Initiative. Through the Justice40 Initiative, federal agencies are directed to work with states and local communities in order to deliver at least 40 percent of the overall benefits from federal investments in climate and clean energy to disadvantaged communities. Programs that are in alignment with the Justice40 Initiative include the Department of Homeland Security's Flood Mitigation Assistance Program and the Department of Housing and Urban Development's Lead Hazard Reduction and Healthy Homes grants.

### b. State Laws, Regulations, and Policies

#### California Government Code Section 65040.12

Senate Bill (SB) 115 of 1999 and SB 89 of 2000 (Section 65040.12 of the Government Code) required the California Office of Planning and Research (OPR) to:

- Consult with the Secretaries of the California Environmental Protection Agency (CalEPA), the Resources Agency, and the Business, Transportation, and Housing Agency, the Working Group on Environmental Justice established pursuant to Section 72002 (now Section 71113) of the Public Resources Code, any other appropriate State agencies, and all other interested members of the public and private sectors in this State.
- Coordinate the Office's efforts and share information regarding environmental justice programs with the CEQ, the United States Environmental Protection Agency, the General Accounting Office, the Office of Management and Budget, and other federal agencies.
- Review and evaluate any information from federal agencies that is obtained as a result of their respective regulatory activities under federal Executive Order 12898, and from the Working Group on Environmental Justice established pursuant to Section 72002 of the Public Resources Code.

SB 89 also required the formation of an advisory committee, California Environmental Justice Advisory Committee (CEJAC) to provide information and assistance to the Secretary of CalEPA and Interagency Working Group on Environmental Justice (IWG) in establishing and implementing an intra-agency strategy to achieve environmental justice. In 2004, the CalEPA released its Environmental Justice Strategy and Action Plan based on the IWG recommendations for identifying and addressing any gaps in existing programs, policies, or activities that may impede the achievement of environmental justice and suggested procedures for collecting, maintaining, analyzing, and coordinating information relating to its environmental justice strategy.

### **California Government Code Section 11135**

California Government Code Section 11135 states that no person in the State of California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the State or by any State agency, is funded directly by the State, or receives any financial assistance from the State.

### **Senate Bill 1000**

Senate Bill 1000, signed in 2016, requires local governments to identify environmental justice communities in their jurisdictions and address environmental justice in their general plans. The bill requires the environmental justice element, or related environmental justice goals, policies, and objectives integrated into other elements, to identify objectives and policies to reduce health risks in disadvantaged communities. Senate Bill 1000 required the environmental justice element, or the environmental justice goals, policies, and objectives in other elements, to be adopted or reviewed upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018.

### **Senate Bill 244**

Senate Bill 244, signed in 2011, requires that general plans identify disadvantaged unincorporated communities, disadvantaged communities located outside of the city limit, but within the Sphere of Influence. Senate Bill 244 requires that cities analyze infrastructure and fire service needs and deficiencies and assess potential funding mechanisms for expansions of services and facilities.

### **California Fair Housing Task Force**

The California Fair Housing Task Force (CFHTF) is a joint task force created in February 2017 between the California Tax Credit Allocation Committee and the California Department of Housing and Community Development. The CFHTF creates opportunity maps to identify areas in every region of the state which identify opportunities for equitable development and inform the California Tax Credit Allocation Committee policies. In December 2017, the California Tax Credit Allocation Committee adopted the map to accompany policies aimed at increasing access to areas for families and children in housing financed with 9 percent Low Income Housing Tax Credits. The CFHTF categorizes areas into 'resources' with areas with the highest opportunity for equitable development categorized as 'Highest Resource' or 'High Resource.'

## c. Local Laws, Regulations, and Policies

### City General Plans and Regulations

Senate Bill 1000 required a consideration of environmental justice in a city's General Plan to be adopted or reviewed upon the adoption or next revision of two or more General Plan elements concurrently on or after January 1, 2018. The City of Stockton is the only city in the SJCOG region that has updated their general plan since January 1, 2018. Therefore, the City of Stockton is the only city in the SJCOG region with explicit environmental justice policies implemented into its General Plan.

#### *City of Stockton 2040 General Plan*

Pursuant to Senate Bill 1000, the City of Stockton's 2040 General Plan contains several policies and actions which are aimed to address environmental justice. Of these, Policy CH-2.1 prioritizes maintenance of streets and improvement of sidewalks, parks, and other infrastructure in areas of the city that historically have been comparatively underserved by public facilities. Actions under Policy CH-2.1 include (City of Stockton 2018):

- **Action CH-2.1A:** When considering parks and infrastructure maintenance and improvement projects, consider the following through an open and engaging process inclusive of community residents:
  - Whether the affected community is underserved or disadvantaged
  - What the priority needs of the community are and whether the project would address those needs
  - Whether the project would negatively impact the community, such as through increased exposure to pollutants or displacement of residents or local businesses
- **Action CH-2.1B:** Provide incentives for rehabilitation or redevelopment of distressed properties that takes into consideration strategies to avoid gentrification
- **Action CH-2.1C:** Develop incentives to promote reuse of distressed areas, such as through re-zoning, permit streamlining, density bonuses, and other appropriate tools.
- **Action CH-2.1D:** Conduct marketing to potential developers to encourage the redevelopment and conversion of distressed commercial strips into housing and mixed-use area that include strategies to avoid gentrification
- **Action CH-2.1E:** Investigate and implement programs that will incentive landlords to maintain properties free of Municipal Code violations and criminal activity
- **Action CH-2.1F:** Work with transit agencies, non-profit organizations, and communities to maintain and improve transit service in underserved and disadvantaged neighborhoods to connect residents with jobs, shopping, and services.

### 4.7.3 Impact Analysis

#### a. Methodology and Significance Thresholds

Under CEQA, a significant impact is defined as "a substantial or potentially substantial adverse change in the environment" (CEQA Section 21068). For determining the significance of environmental justice impacts, the analysis focuses on whether environmental benefits and burdens

are distributed generally equally across the region's EJ and non-EJ communities, or if EJ communities bear substantially greater environmental burdens or benefit substantially less than non-EJ communities.

To evaluate whether EJ communities would disproportionately bear the impacts of the transportation system resulting from the 2022 RTP/SCS, the following performance measure were used across the region's population to evaluate whether EJ communities would benefit proportionally from the benefits of the 2022 RTP/SCS transportation improvements. The following performance measures were analyzed:

- Percentage of EJ households versus non-EJ households within 500 feet of a major transportation corridor.
- Percentage of EJ households versus non-EJ households within a half-mile of transit
- Percentage of EJ households versus non-EJ households within a half-mile of employment

In addition, the diversity of the housing stock was evaluated to assess the effects of the 2022 RTP/SCS on the provision of diverse housing types. The provision of more affordable housing types is an important issue in considering impacts to EJ communities because lack of housing can lead to displacement of existing EJ communities, typically to areas with poorer environmental conditions. The 2022 RTP/SCS would have a significant EJ impact if the plan would lower the availability of more affordable housing types.

EJ is not a resource area included in Appendix G of the *State CEQA Guidelines*. For the purposes of this Program EIR, SJCOG has determined that significant impacts to EJ communities would occur if the 2022 RTP/SCS would:

1. Result in disproportionately high or adverse environmental impacts to EJ communities;
2. Result in disproportionately lower distribution of benefits derived from the proposed transportation improvement projects to EJ communities; or
3. Result in decreased availability of affordable housing stock.

## **b. Project Impacts and Mitigation Measures**

The following section discusses potential impacts and mitigation measures that may be associated with projects contained within the 2022 RTP/SCS. a Section 4.7.2.c summarizes the impacts associated with capital improvement projects proposed in the 2022 RTP/SCS. Due to the programmatic nature of the 2022 RTP/SCS, a precise, project-level analysis of the specific impacts associated with individual transportation and land use projects is not possible at this time. In general, however, implementation of proposed transportation improvements and future projects under the land use scenario envisioned by the 2022 RTP/SCS could result in the impacts as described in the following section.

**Threshold 1:** Disproportionately high or adverse environmental impacts to EJ communities

**Impact EJ-1** THE PROPOSED TRANSPORTATION IMPROVEMENTS AND LAND USE PROJECTS ENVISIONED BY THE PROPOSED 2022 RTP/SCS WOULD NOT RESULT IN ADVERSE IMPACTS TO EJ HOUSEHOLDS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

### Short-Term Impacts

During construction of some transportation improvement projects and the development of the land use scenario envisioned in the proposed 2022 RTP/SCS, some minority and/or low-income populations may experience impacts. Improvement projects included in the proposed 2022 RTP/SCS may have short-term impacts on surrounding communities related to construction, including impacts related to air quality, noise, and traffic (refer to Sections 4.3, *Air Quality*, 4.13, *Noise*, and 4.14 *Transportation*, respectively). Specific air quality impacts could include exposure to dust and diesel particulate matter (DPM) due to the operation of construction vehicles (i.e., scrapers, loaders, dump trucks), and clearing and grading activities. Other air quality impacts include short term exposure to hazardous air emissions, such as diesel emissions from construction equipment. Construction noise impacts from the use of heavy equipment at construction sites could expose nearby receptors to levels up to 101 decibels at 50 feet from the source, as discussed in Section 4.13, *Noise*. Temporary traffic impacts include delays during road closures or other disturbances from construction activities could occur from implementation of the proposed 2022 RTP/SCS.

According to SJCOG, the majority of EJ communities are primarily concentrated within the city of Stockton, Lodi, and adjacent to Lathrop and Manteca (SJCOG 2022a). Proposed transportation projects and land use development envisioned by the 2022 RTP/SCS would take place in these communities. However, future land use and transportation projects would not solely be placed within identified EJ communities. Transportation projects, including roadway widenings, roadway extensions, roadway replacement, and railroad crossings would occur in areas that are not identified as EJ communities. These projects are present in unincorporated San Joaquin County, as well as within incorporated cities such as Lathrop, Manteca, Tracy, and Lodi. Therefore, transportation projects would occur throughout the region. As such, short-term construction impacts would not disproportionately effect EJ populations. Short-term impacts would be less than significant.

### Long-Term Impacts

Proximity to major transportation corridors can increase a population's exposure to high levels of noise, as well as air contaminants, such as DPM from diesel exhaust and re-entrained road dust caused by moving vehicles. Environmental justice populations are usually located closer to freeways and could be adversely impacted by the proposed 2022 RTP/SCS if it would increase the percentage of the EJ population within 500 feet of a major transportation corridor, as compared to the non-EJ population, relative to existing conditions.

Under existing conditions, 5.3 percent of households in EJ communities are within 500 feet of a freeway, compared to 5.4 percent in non-EJ communities. At 2046 with proposed project conditions, 6.1 percent of households in EJ communities would be within 500 feet of a freeway, compared to 5.7 percent non-EJ communities. This is the result of the proposed 2022 RTP/SCS focusing on infill and redevelopment of existing property which tends to be within or near an urban core where there is a higher density of freeways. Although the proposed 2022 RTP/SCS would result

in an increased percentage of households in EJ communities within 500 feet of a freeway, it would increase for non-EJ communities as well. In addition, the projected increase, less than one percent for both EJ and non-EJ households, would not account for a disproportionately high impact to EJ communities. Therefore, the proposed 2022 RTP/SCS would not be disproportionately or adversely affect EJ communities. This impact would be less than significant.

**Mitigation Measures**

No mitigation measures are required.

**Significance After Mitigation**

Impacts would be less than significant without mitigation.

**Threshold 2:** Disproportionately lower distribution of benefits derived from the proposed transportation improvement projects to EJ communities

**Impact EJ-2 THE PROPOSED TRANSPORTATION IMPROVEMENTS ENVISIONED BY THE PROPOSED 2022 RTP/SCS WOULD NOT RESULT IN A DISPROPORTIONATELY LOWER DISTRIBUTION OF BENEFITS TO EJ COMMUNITIES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

For populations with limited financial, physical or other means, convenient access to transit is critical due to the lower likelihood of these populations having access to a vehicle. The transportation portfolio selected under the proposed 2022 RTP/SCS would maintain a medium level of transit investment, similar to existing conditions. Table 4.7-3 illustrates how transit improvements are distributed among the EJ and non-EJ population under existing conditions and 2046 conditions with implementation of the proposed 2022 RTP/SCS. The table includes two metrics: the percentage of EJ and non-EJ households located within 0.5-mile of transit, and the percentage of EJ and non-EJ households located within 0.5-mile of employment.

**Table 4.7-3 Percentage of Households within One-Half Mile of Transit and Employment**

Metric	Percent EJ Households   Percent Non-EJ Households	
	2016	2046 with 2022 RTP/SCS
Households located within 0.5-mile of transit	18.9 4.6	23.9 4.2
Employment located within 0.5-mile of transit	29.9 12.9	30.1 11.1

Source: SJCOG 2022b

As shown in Table 4.7-3, the proposed 2022 RTP/SCS would increase the proportion of EJ households located within 0.5-mile of transit and 0.5-mile of employment relative to existing conditions. As such, the 2022 RTP/SCS would distribute benefits derived from the proposed transportation improvement projects to EJ communities. Therefore, impacts would be less than significant.

**Mitigation Measures**

No mitigation measures are required.

**Significance After Mitigation**

Impacts would be less than significant without mitigation.

**Threshold 3:** Decreased availability of affordable housing stock

**Impact EJ-3      IMPLEMENTATION OF THE LAND USE SCENARIO ENVISIONED BY THE PROPOSED 2022 RTP/SCS WOULD INCREASE THE AVAILABILITY OF AFFORDABLE HOUSING STOCK. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

The provision of affordable housing is an important issue in considering impacts to EJ communities because lack of housing can lead to displacement of existing EJ communities, typically to areas with poorer environmental conditions. Providing a greater mix of housing types allows for a greater range of options for all populations, including the EJ population, and also provides for a greater range of housing affordability. Typically, multifamily housing provides more a more affordable option relative to single family housing.

Table 4.7-4 provides the composition of SJCOG’s housing stock under baseline and 2046 with proposed 2022 RTP/SCS conditions. As indicated in the table, the diversity of the housing stock would increase, with a greater percentage of multi-family housing available in 2046 under proposed 2022 RTP/SCS conditions.

**Table 4.7-4      Composition of Housing Stock in Identified EJ Areas**

Housing Type	Percent of Housing Stock	
	2016	2046 with 2022 RTP/SCS
Single Family	69	60
Multifamily/Mobile Homes/Other	31	40

Source: SJCOG 2022b

Additionally, under the proposed 2022 RTP/SCS, 37 percent of new dwelling units would be provided at 20+ units per acre (SJCOG 2022b). Furthermore, the proposed 2022 RTP/SCS would provide housing within identified EJ areas. The CFHTF identifies Highest Resource and High Resource areas within and immediately surrounding the cities of Tracy, Manteca, Lathrop, Lodi, and Stockton (CFHTF 2022). Under the proposed 2022 RTP/SCS, 67 percent of new households would be developed in areas identified as Highest Resource or High Resource (SJCOG 2022b). As noted in CFHTF methodology, the Highest Resource and High Resource areas would qualify under the 9 percent Federal Low-Income Housing Tax Credit Program which provides a reduction in federal tax liability to investors partnering with project sponsors in the development of qualified low-income housing (CFHTF 2021). Therefore, implementation of the proposed 2022 RTP/SCS would not decrease the diversity of the housing stock, but rather improve housing diversity and affordability. This impact would be less than significant.

**Mitigation Measures**

No mitigation measures are required.

**Significance After Mitigation**

Impacts would be less than significant without mitigation.

**c. Proposed 2022 RTP/SCS Projects That May Result in Impacts**

Table 4.7-5 identifies proposed 2022 RTP/SCS projects that may result in impacts to environmental justice communities. Given the large number of projects envisioned across the SJCOG region in the proposed 2022 RTP/SCS, the table shows a representative rather than comprehensive list of projects. Listed projects that would generate these impacts are representative of the types of impacts and the types of projects that could be affected in different localities.

**Table 4.7-5 Specific 2022 RTP/SCS Projects that May Result in Impacts**

Agency	Project Location	Project Scope	Impact
City of Lodi	SR-99 at Harney Lane	Reconstruct interchange to provide 6 through lanes on SR 99, 4 lanes on Harney between Reynolds Ranch Pkwy and SR 99 and modify on-ramps and off-ramps	EJ-1
City of Lodi	SR-99 at Turner Road	Reconstruct interchange to provide operational and safety improvements on SR 99 at Turner Road (PM 31.3/31.6)	EJ-1
City of Manteca	Airport Way SR-120 to Yosemite Avenue	Widen from 2 to 4 lanes	EJ-1
City of Manteca	Airport Way Lathrop Road to Roth Road	Widen from 2 to 4 lanes	EJ-1
City of Stockton	Airport Way	Intersection and operational improvement	EJ-1
City of Stockton	French Camp Road	Widen from 2 to 6 lanes	EJ-1
City of Stockton	I-5 at Otto Drive	Construction of a new interchange and auxiliary lanes (PM 33.3/34.2)	EJ-1
San Joaquin County	Howard Road	Passing lanes and channelization	EJ-1

**4.7.4 Cumulative Analysis**

The cumulative impact analysis area for environmental justice consists of the SJCOG region and adjoining counties. Information regarding these adjoining counties can be found in Section 3, *Setting*. Future development in this region that could impact environmental justice communities is considered in this analysis. This cumulative extent is used to evaluate potential direct and indirect, permanent, and temporary impacts from disproportionately causing more environmental impacts in environmental justice communities, lowering the benefit of projects for environmental justice communities, or decreasing affordable housing stock within the context of the cumulative impact analysis area.

Growth and development in adjoining counties would be developed in accordance with applicable General Plans, RTP/SCS programs, and other planning documents across the cumulative impact area. As such, any proposed growth and development would be required to comply with goals, policies, and programs adopted for the purpose of avoiding or mitigating environmental effects, including those that pertain specifically to EJ communities. However, as applicable planning documents across the cumulative impact area focus efforts to encourage transit-oriented infill development pursuant to State GHG reduction goals, a greater proportion of residential development, particularly high-density, low-income residential development, would be placed near transit corridors and exposed to environmental effects associated with living near a transportation

corridor. Therefore, cumulative impacts related to environmental justice communities would be significant.

As previously discussed in Impact EJ-1, the proposed 2022 RTP/SCS would not result in significant and unavoidable impacts to EJ communities with regards to disproportionately high adverse effects to EJ communities as a result of closer proximity to transportation corridors. The proposed 2022 RTP/SCS would prioritize transit-oriented infill development which would result in a minor increase of both EJ and non-EJ housing located near transportation corridors. As such, EJ housing would not be disproportionately exposed to adverse environmental effects associated with living near a transportation corridor. Therefore, the contribution of the proposed 2022 RTP/SCS to cumulative EJ impacts would not be cumulatively considerable.