

Mitigating Negative Consequences of New Urban Growth in Disadvantaged Communities

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16. Abstract New housing and development in California are often planned in communities that already face economic hardship, environmental burdens, and limited access to reliable transportation. Recent research finds specifically that in the San Francisco (S.F.) Bay Area and Southern California (SoCal) metropolitan regions, there is a high propensity to plan new urban development in socially, economically, and environmentally disadvantaged communities (DACs) with poor transit accessibility and limited personal mobility. This project first reviews the literature to identify potential unintended negative impacts of high concentrations of new urban growth in DACs across social, economic, educational, environmental, and transportation dimensions. It then identifies the tools to mitigate these impacts. Next, it selects four DACs—North Richmond (primarily in unincorporated Contra Costa County) and West Oakland (City of Oakland) in the S.F. Bay Area, and Bloomington (unincorporated San Bernardino County) and Florence-Firestone (unincorporated Los Angeles County) in Southern California—that are targeted for new growth in their regional plans. Using document analysis and semi-structured stakeholder interviews, this study next examines the kinds of disadvantages these communities face and the tools used to mitigate them. It finally qualitatively assesses how well the disadvantages are being mitigated. The study finds that DACs located in unincorporated county areas lack political champions and do not receive close, focused attention from county government departments. Regional policies are often vague and ineffective, and while several tools exist to mitigate disadvantages, their implementation or efficacy at the DAC level is sparse. Without stronger policies, new development risks reinforcing existing inequities—placing more housing in areas where residents already face long commutes, fewer services, and greater environmental risks. The study recommends focused state and federal aid to DACs. The regional agencies should develop a policy framework to proactively mitigate disadvantages in DACs. The state and regional agencies should develop regulations and incentives for local governments to meet the needs of DACs, including by engaging local community-based organizations. Finally, local government should facilitate fair and effective community benefit agreements with the developers and local employers.			
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Executive Summary

Background

Recent California legislation (such as SB35, SB9, and SB10) and the state’s Metropolitan Planning Organizations (MPOs) have sought to reduce greenhouse gas (GHG) emissions caused by vehicle miles traveled (VMT) by promoting infill housing development in transit-rich areas. While important for reducing VMT, such urban developments could have unintended negative consequences if planned in already distressed, underserved communities. These disadvantaged communities (DACs) can include those with limited access to parks, libraries, and roads; poor quality public transit, schools, and air; and limited access to healthy food. Such communities could also be high in crime or have overcapacity infrastructure and services (for example, large class sizes in schools and congested parks and libraries). A lawsuit against the California Air Resource Board (CARB) contended that the focus on developing housing in existing urban areas is unlikely to affect white, wealthy, and elderly homeowners much while disproportionately negatively impacting minority aspiring homeowners since, in the absence of public subsidies, infill housing is likely to be prohibitively expensive.¹ The plaintiff's assertions in this case are partially supported by recent CSU SB1-funded research—Mathur and Ferrell (2024)—which found a higher propensity for planned new housing developments (many of them infill and transit-oriented) in socially, economically, and environmentally disadvantaged communities in the San Francisco (S.F.) Bay Area and Southern California (SoCal) metropolitan regions.² Other recent research supports these conclusions and concerns as well.³ Knowing this, it becomes critical to identify which plans, policies, strategies, and funding (henceforth, called tools) are available to mitigate these impacts and which additional tools are needed.

¹ *The Two Hundred v. California Air Resources Board* – complaint, Climate Litigation Database, accessed December 8, 2025, https://www.climatecasechart.com/documents/the-two-hundred-v-california-air-resources-board-complaint_a6e4.

² Shishir Mathur and Christopher Ferrell, *Are California’s Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities? Evidence from the Southern California and San Francisco Bay Area Regions* (San Jose, CA: Mineta Transportation Institute, San José State University, October 2024), https://scholarworks.sjsu.edu/cgi/viewcontent.cgi?article=1518&context=mti_publications.

³ Karen Chapple, Paul Waddell, Daniel Chatman, Miriam Zuk, Anastasia Loukaitou-Sideris, Paul Ong, Karolina Gorska, Chhandara Pech, and Silvia R. Gonzalez, *Developing a New Methodology for Analyzing Potential Displacement* (Berkeley, CA: University of California, Berkeley, and University of California, Los Angeles, 2017), <https://escholarship.org/uc/item/6xb465cq>; Philip Verma, Dan Rinzler, Eli Kaplan, and Miriam Zuk, *Rising Housing Costs and Re-Segregation in the San Francisco Bay Area* (Berkeley, CA: Urban Displacement Project, University of California, Berkeley, 2019), https://www.urbandisplacement.org/wp-content/uploads/2021/08/bay_area_re-segregation_rising_housing_costs_report_2019.pdf; Karen Chapple and Anastasia Loukaitou-Sideris, *White Paper on Anti-Displacement Strategy Effectiveness* (Sacramento, CA: California Air Resources Board, 2021), <https://ww2.arb.ca.gov/sites/default/files/2021-04/19RD018%20-%20Anti-Displacement%20Strategy%20Effectiveness.pdf>.

Mathur and Ferrell (2024)⁴ identified five main dimensions of disadvantage—demographic, economic, educational, environmental, and transportation—with several sub-dimensions within each dimension. Furthermore, they collected data on these five dimensions and sub-dimensions to conduct U.S. Census block-group-level analysis to identify DACs in the two largest metropolitan organizations and the regions covered by them: the SoCal region covered by the Southern California Association of Governments (SCAG) and the S.F. Bay Area covered by the Association of Bay Area Governments (ABAG)-Metropolitan Transportation Commission (MTC). Next, they overlaid the areas within these two regions planned for future urban development—Priority Development Areas or PDAs in the S.F. Bay Area and the Priority Growth Areas, PGAs, and Spheres of Influence, SOIs, in the SoCal region. Finally, they spatially overlaid the DACs and the PDAs/PGAs/SOIs to identify the top four jurisdictions (cities or unincorporated counties) in each region where a large proportion of new urban growth is planned within DACs.⁵

Building on the findings of Mathur and Ferrell (2024), the proposed research project conducts an in-depth examination of four DACs from among the top four jurisdictions each from the S.F. Bay Area (Oakland, Fairfield, Pittsburg, and unincorporated Contra Costa County) and SoCal (unincorporated San Bernardino County, unincorporated Los Angeles (LA) County, unincorporated Riverside County, and the City of Los Angeles) regions, slated to accommodate new urban growth in DACs.⁶ These DACs are West Oakland (WO) and North Richmond (NR) in S.F. Bay Area and Bloomington and Florence-Firestone (F-F) in SoCal.

Research Questions

This research seeks to answer the following research questions:

RQ 1: What are the potential unintended negative impacts of high concentrations of new urban growth in DACs along the socio-economic, educational, environmental, and transportation dimensions identified in Mathur and Ferrell (2024)?⁷

RQ 2: What are the literature-suggested tools that could be used to mitigate these impacts?

RQ 3: What are the most suitable DACs in the S.F. Bay Area and SoCal regions to examine for this study?

⁴ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

⁵ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

⁶ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

⁷ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

RQ 4: What tools are being employed or could be employed in these DACs to avoid the negative unintended impacts identified while answering RQ 1?

RQ 5: Qualitatively, how well are the negative impacts of new urban growth being mitigated in the case study DACs?

Findings

Legacy DACs, except Bloomington

Except for Bloomington, which has faced major environmental pollution since the introduction of warehousing and trucking there in the last 2–3 decades, the other three case study communities have long legacies as DACs. Their current designation as PDAs/PGAs/SOIs is likely to worsen these disadvantages, given the inconsistent efforts to mitigate existing disadvantages and to foresee and plan to mitigate the new ones, such as gentrification-led displacement.

All case study DACs have a majority non-white population, and, with the exception of WO, all have a Hispanic-majority population. Moreover, except Bloomington, all were previously Black-majority. Furthermore, except for Bloomington, all the other DACs were historically industrial areas that also housed industrial workers, with two, NR and F–F, continuing that legacy.

Location in unincorporated county areas

The popular notion is that DACs are in inner-city areas of large cities. However, except for WO, three case study DACs are in unincorporated counties (including NR, which is largely in an unincorporated county area with a small portion in the City of Richmond).

DACs in unincorporated areas present multiple challenges from a political/organizational perspective. DACs, even when they are large in size and population—such as F–F, which has approximately 60,000 residents—usually comprise a small portion of the unincorporated county area and their county board of supervisors’ district, putting them at a political disadvantage where they often lack political champions. Furthermore, they don’t receive close, focused attention from county government departments, which are usually stretched too thin, have scarce financial resources, or are usually not equipped to provide urban-level services. For example, the study team could not find a single contact person at the LA County Planning Department knowledgeable about all planning and development activities in F–F.

From a policy perspective, too, being a small part of an unincorporated county puts DACs at a disadvantage, as county-wide policies, not those tailored to DACs, are usually adopted and implemented. For example, in its efforts to meet aggressive Regional Housing Need Allocation (RHNA) numbers, LA County has been promoting dense housing in F–F around transit stations. While this housing is largely below market rate, it is multi-family—not the housing type desired

by its predominantly single-family residents. Furthermore, the county attempted to rezone heavy industrial parcels to less intensive industrial uses, but met with resistance from local businesses.

Finally, in the case of Bloomington, the county and the neighboring cities' governments continue to promote warehouses while neglecting to address Bloomington residents' and their CBOs' pollution and transportation safety-related concerns.

On a related note, while all the case study DACs comprise a large number of single-family homes, primarily compact multi-family developments are planned in them. In the case of WO, the new market-rate multi-family housing developments raise gentrification concerns in a predominantly working-class single-family community. In Bloomington, existing residents who moved there tend to enjoy a more rural lifestyle push back on efforts to provide new multi-family housing by opposing sewer upgrades, hoping that a lack of sewer infrastructure will deter new development.

Several tools exist to mitigate disadvantage but their implementation or efficacy at the DAC-level is sparse

According to the literature and as confirmed in our case studies, employment and workforce development tools are the most popular means of mitigating socio-economic disadvantage. But they are primarily in the form of plans and policies at the county, regional, or state levels, with little evidence of their meaningful impact at the DAC level.

Provision of new community-relevant affordable housing is sparse, except for the redevelopment of the Delta housing project in NR and a couple of affordable housing developments in Bloomington. However, DAC-level plans, such as West Oakland Specific Plan (WOSP) in WO, NR Quality of Life (NR QOL) Plan in NR, and Valley Corridor Specific Plan (VCSP) in Bloomington, have ambitious housing-related policies, supporting the notion that DAC-based CBOs are most effective at identifying and addressing DAC concerns.

Finally, while some efforts are being made, mainly at the DAC level, to improve access to healthy foods (such as the NR farm, farmers markets, and food banks), the impact is meaningful, but nonetheless low. None of the case study DACs has a grocery store selling fresh produce.

The case study DACs also face significant education-related disadvantages. The quality of K–12 education and the overall level of education in the DACs are low. While several programs exist to support K–12 education, especially at the state and federal levels, the overall quality of K–12 education remains poor. Moreover, the inability to secure interviews or meaningful feedback from the school districts where the case study DACs are located hampered this study's ability to assess the effectiveness of these programs. The most common tools to increase overall education at the DAC level include workforce training and small-business incubation, but they are not sufficient to effectively address the underlying low educational levels in these communities.

The case study DACs face significant environmental disadvantages. Several plans and policies typically exist at the city, county, regional, state, and federal levels; however, their impact at the DAC level in the form of actionable projects is sparse. Often, the most proactive measures include actively tracking air pollution (in the case of WO and F-F). Furthermore, alarmingly little is being done to reduce children's exposure to lead, especially given the old housing stock in all the DACs. In a similar vein, while ground (including groundwater) contamination is a significant problem in WO, NR, and F-F, and several tools exist at the regional, state, and federal level, very few mitigation measures were observed at the DAC level.

Finally, minimal on-the-ground measures exist to promote local non-auto accessibility, overall neighborhood-level accessibility, and regional transit accessibility. Some notable projects include the Mandela BART mixed-use project in WO, the construction of a few bike lanes in F-F, and the development of transit-oriented housing and transportation corridors in F-F. Apart from these, several plans and policies exist at the city/county, regional, state, and federal levels with unclear impacts at the DAC level.

Surprisingly, there is a lack of DAC-level intervention despite the existence of DAC-level tools such as the WOSP in WO, the NR QOL Plan in NR, the VCSP in Bloomington, and the Florence-Firestone Transit-Oriented Development Specific Plan (FFTODSP) in F-F, and the presence of CBOs such as the West Oakland Environmental Indicators Project (WOEIP) and Mandela Partners in WO, the Richmond Community Foundation (RCF) and the Community Housing Development Corporation (CHDC) in NR, the Center for Community Action and Environmental Justice (CCA EJ) and the People's Collective for Environmental Justice (PC4EJ) in Bloomington, and Florence-Firestone Community Organization (FFCO) in F-F. However, apart from a few, many CBOs have limited capacity, and some, such as PC4EJ and CCA EJ, have found city and county governments uncooperative and unresponsive to their views and needs. Nevertheless, the efforts CBOs have taken in WO, NR, and F-F to produce their own DAC-level plans and/or to have their concerns and ideas integrated into and influencing the plans of government entities are notable, both in terms of the tenacity and effectiveness of CBOs to advocate for their communities.

Lack of effectiveness of regional policies

While all the case study DACs are identified for future growth due to their designation as PDAs/PGAs/SOIs in the regional plans, the regional tools seem to have little impact at the DAC level. Interviewees—both local government and CBO staff—reported being largely unaware of policies, strategies, and action items noted in the regional plans (Plan Bay Area for the S.F. Bay Area region and Connect SoCal 2024 for the Southern California region). Some identified these policies, strategies, and action items as highly aspirational or generic.

Recommendations

State and federal funds directed to DACs

All the case study DACs exist in fiscally constrained cities such as Oakland and North Richmond, or in counties such as San Bernardino, LA, and Contra Costa. The local governments in these cities and counties need significant financial support to effectively address the substantial disadvantages impacting these communities. For example, lead abatement policies in local general plans mean little without financial assistance for the community to undertake lead abatement projects. Similarly, funds are needed to incentivize grocery stores to locate in DACs and to construct pedestrian and bike facilities. Finally, funds are also needed to monitor the efficacy of plans and projects. While new funding sources are needed, benefits to DACs can be achieved through more targeted and DAC resident-led funding allocations and implementation.

Regulations and incentives for local governments to meet the needs of DACs

The review of F-F and Bloomington case studies suggests that county governments view DACs as locations to meet their county-wide objectives, such as housing (in F-F) and economic development through warehouses (in Bloomington). Often, these objectives don't align with the DACs' needs or, in Bloomington's case, further worsen the environmental disadvantage. Hence, through regulation and incentives, state and regional agencies should require local governments to mitigate the disadvantages of DACs actively. For example, new projects in DACs could be required to undergo a comprehensive impact assessment to demonstrate that they will either not worsen existing disadvantages or reduce them. Notably, CBOs point out that recent state laws that allow ministerial approvals for transit-oriented affordable housing have adverse effects on DACs because these projects are being developed under the radar in these communities, particularly in DACs such as WO which already serve as an asset for their regions with their affordable housing stock.

Fair and effective community benefit agreements with the developers/local employers

While a few instances of a local employer helping the community exist—such as the partnership between Chevron and RCF called Equip Richmond, in which Chevron invested \$10 million in the communities adjacent to its refinery, with no term limit—they appear to be rare. In most cases, such as the warehouses in Bloomington or the affordable housing developments in F-F, the DAC residents gain very little from the new development. In fact, they are left more disadvantaged on some dimensions, such as the environmental dimension in Bloomington and the social dimension in F-F, where new developments increased pollution and replaced local landmarks, respectively. Therefore, as disadvantaged PDAs/PGAs/SOIs receive new development, local governments should facilitate fair and effective community benefit agreements aligned with the communities' needs.

Require local governments to proactively engage CBOs

Local governments' relationships with local CBOs are mixed. In some cases, such as WO and NR, CBOs and local governments work together on projects. In the case of F-F, the local CBO, FFCO, had to press to get the local government to take note of the community's historical character, which is sometimes under threat from new development, while in Bloomington, the CBOs and the county government do not have much of a noticeable cooperative relationship. Often, these CBOs know the on-the-ground conditions well and are the primary voices of these low-income, minority, marginalized communities. Therefore, local governments should be required to proactively engage local CBOs in all aspects of planning, implementation, and monitoring.

Comprehensive framework to implement regional tools

Mathur and Ferrell (2024) found that PDAs/PGAs/SOIs are twice as likely as other urban areas to be disadvantaged.⁸ They also operationalized community-level disadvantage across various dimensions and sub-dimensions and, through GIS maps, showed the location of DACs. The regional agencies should use such data to develop nuanced policy frameworks that require proactive mitigation of disadvantages in DACs, especially those prioritized for future growth. Such a framework should serve as the basis for financial assistance, regulations, incentives, and other efforts outlined in our recommendations to mitigate these disadvantages.

⁸ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

1. Introduction

1.1 Background

Recent California legislation (such as SB35, SB9, and SB10) and the state’s Metropolitan Planning Organizations (MPOs) have sought to reduce greenhouse gas (GHG) emissions caused by vehicle miles traveled (VMT) by promoting infill housing development in transit-rich areas. While important for reducing VMT, such urban developments could have unintended negative consequences if planned in already distressed, underserved communities. These disadvantaged communities (DACs) can include those with limited access to parks, libraries, and roads; poor quality public transit, schools, and air; and limited access to healthy food. Such communities could also be high in crime or have overcapacity infrastructure and services (for example, large class sizes in schools and congested parks and libraries). A lawsuit against the California Air Resource Board (CARB) contended that the focus on developing housing in existing urban areas is unlikely to affect white, wealthy, and elderly homeowners much while disproportionately negatively impacting minority aspiring homeowners since, in the absence of public subsidies, infill housing is likely to be prohibitively expensive.⁹ The plaintiff’s assertions in this case are partially supported by recent CSU SB1-funded research—Mathur and Ferrell (2024)—which found a higher propensity for planned new housing developments (many of them infill and transit-oriented) in socially, economically, and environmentally disadvantaged communities in the San Francisco (S.F.) Bay Area and Southern California (SoCal) metropolitan regions.¹⁰

Other recent research supports these conclusions and concerns, including Chapple et al.’s study of the S.F. Bay Area and Los Angeles regions, which found that transit-oriented developments (TODs) around fixed-rail stations increased house prices and displaced existing low-income households.¹¹ Similarly, Verma et al. found that increases in house prices between 2005 and 2015 displaced many S.F. Bay Area minority communities and reduced their access to high-resource neighborhoods.¹²

⁹ *The Two Hundred v. California Air Resources Board* – complaint, Climate Litigation Database, accessed December 8, 2025, https://www.climatecasechart.com/documents/the-two-hundred-v-california-air-resources-board-complaint_a6e4.

¹⁰ Mathur and Ferrell, Are California’s Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

¹¹ Karen Chapple, Paul Waddell, Daniel Chatman, Miriam Zuk, Anastasia Loukaitou-Sideris, Paul Ong, Karolina Gorska, Chhandara Pech, and Silvia R. Gonzalez, *Developing a New Methodology for Analyzing Potential Displacement* (Berkeley, CA: University of California, Berkeley, and University of California, Los Angeles, 2017), <https://escholarship.org/uc/item/6xb465cq>.

¹² Philip Verma, Dan Rinzler, Eli Kaplan, and Miriam Zuk, *Rising Housing Costs and Re-Segregation in the San Francisco Bay Area* (Berkeley, CA: Urban Displacement Project, University of California, Berkeley, 2019), https://www.urbandisplacement.org/wp-content/uploads/2021/08/bay_area_re-segregation_rising_housing_costs_report_2019.pdf.

Additional research following this line of inquiry has assessed the effectiveness of anti-displacement strategies.¹³ Knowing this, it becomes critical to identify which plans, policies, strategies, and funding (henceforth called tools) are available to mitigate these impacts, and which additional tools are needed.

Mathur and Ferrell (2024) identified five main dimensions of disadvantage with several sub-dimensions within each dimension as follows:

1. Demographic (DE): Under the demographic dimension, Mathur and Ferrell (2024) identified two sub-dimensions that indicate disadvantages within a community. The first, DE1—if the U.S. Census block group is in the bottom quartile of the entire region’s block groups in terms of the percentage of the white-alone population—measures the concentration of racial minorities. The second, DE2—if the U.S. census tract is in the top quartile of the entire region’s census tracts in terms of the percentage of single-parent households—measures the concentration of single-parent households.
2. Economic (EC): Under the economic dimension, Mathur and Ferrell (2024) identified two subdimensions that demonstrate economic disadvantages in a community. The first, EC1—median rent of the U.S. Census block group is more than 50% of gross income—indicates a lack of affordable housing, and the second, EC2—household income of the U.S. Census block group is less than or equal to 50% of the county’s area median income (AMI)—indicates concentrated poverty.
3. Educational (ED): Under the educational dimension, Mathur and Ferrell (2024) identified two sub-dimensions that indicate disadvantages within a community. The first, ED1—if the U.S. Census block group is in the bottom quartile of the entire region’s block groups in terms of percentage of adults over 25 years of age with a high school diploma or above—is indicative of the overall low level of education at the neighborhood level. The second, ED2—if the U.S. Census block group is in the bottom quartile of the entire region’s block groups for the U.S. Department of Housing and Urban Development’s (HUD’s) School Proficiency Index—indicates low-quality K–12 education.¹⁴
4. Environmental (EN): Under the environmental dimension, Mathur and Ferrell (2024) identified three subdimensions that demonstrate disadvantages in a community. The first sub-dimension, EN1, measures air pollution exposure. Specifically, a U.S. census tract is disadvantaged if it is in the top quartile of the entire state’s census tracts for the average percentile of concentrations of ozone, particulate matter 2.5 (PM 2.5) micrometers in size

¹³ Karen Chapple and Anastasia Loukaitou-Sideris, White Paper on Anti-Displacement Strategy Effectiveness (Sacramento, CA: California Air Resources Board, 2021), <https://ww2.arb.ca.gov/sites/default/files/2021-04/19RD018%20-%20Anti-Displacement%20Strategy%20Effectiveness.pdf>.

¹⁴ Mathur and Ferrell, Are California’s Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

or smaller, diesel particulate matter, and toxic releases to air from industrial facilities. The second sub-dimension, EN2, measures ground exposure to pollution (minus lead). Specifically, a U.S. census tract is disadvantaged if it is in the top quartile of the entire state's census tracts for a composite measure that comprises 2/3 of the average of the percentiles of exposure to drinking water contaminants and use of certain high-hazard and high-volatility pesticides, and 1/3 of the average of the percentiles of environmental effects of toxic cleanup sites, groundwater threats from leaking underground storage sites and cleanups, hazardous waste facilities and generators, impaired water bodies, and solid waste sites and facilities. The third sub-dimension, EN3, measures children's exposure to lead from housing. Specifically, a U.S. census tract is disadvantaged if it is in the top quartile of the entire state's census tracts for children's exposure to lead.¹⁵

5. Transportation (TR): Under the transportation dimension, Mathur and Ferrell (2024) identified five subdimensions that demonstrate disadvantages in a community, covering overall transportation mobility, and local and regional auto and non-auto transportation accessibility. The first, TR1—if the U.S. Census block group is in the top quartile of the entire region's block groups for the percent of households with zero vehicles—indicates poor household-level mobility using automobiles. The second, TR2—intersection density in terms of pedestrian-oriented intersections with four or more legs per square mile, is between 0 and 15 intersections/sq.mi.—indicates poor local non-auto (pedestrian/bike) accessibility. The third, TR3—if the distance from the population-weighted centroid to the nearest transit stop is greater than 800 meters (½ mile)—indicates poor transit accessibility. The fourth, TR4—if the gross activity density (employment and housing units) on unprotected land available for development is less than 18/acre—indicates poor overall local/neighborhood accessibility. Finally, the fifth, TR5—if the U.S. Census block group is in the bottom quartile of the entire region's block groups for jobs within a 45-minute transit commute, distance-decay weighted (walked network travel time, GTFS schedules)—indicates poor regional transit accessibility.¹⁶

Furthermore, Mathur and Ferrell (2024) collected data on all the above five dimensions/sub-dimensions to conduct U.S. Census block-group-level analysis to identify DACs in the two largest metropolitan organizations (MPOs) and the regions covered by them—the SoCal region covered by Southern California Association of Governments, or SCAG, and the S.F. Bay Area covered by the Association of Bay Area Governments (ABAG)-Metropolitan Transportation Commission (MTC). Next, they overlaid the areas within these two regions

¹⁵ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

¹⁶ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

planned for future urban development—Priority Development Areas or PDAs in the S.F. Bay Area and the Priority Growth Areas, PGAs, and Spheres of Influence, SOIs, in the SoCal region. Finally, they spatially overlaid the DACs and the PDAs/PGAs/SOIs to identify the top four jurisdictions (cities or unincorporated counties) in each region where a large proportion of new urban growth is planned within DACs.¹⁷

Building on the findings of Mathur and Ferrell (2024), the current research project conducts an in-depth examination of four DACs from among the top four jurisdictions each from the S.F. Bay Area (Oakland, Fairfield, Pittsburg, and unincorporated Contra Costa County) and SoCal (unincorporated San Bernardino County, unincorporated LA County, unincorporated Riverside County, and the City of Los Angeles) regions slated to accommodate new urban growth in DACs.¹⁸ These DACs are the most distressed among Oakland, Fairfield, Pittsburg, and unincorporated Contra Costa County in Northern California, and unincorporated San Bernardino County, unincorporated LA County, unincorporated Riverside County, and the City of Los Angeles in Southern California. Moreover, a significant amount of new urban growth is planned inside them through either redevelopment or greenfield development.

1.2 Research Questions

This research seeks to answer the following research questions:

RQ 1: What are the potential unintended negative impacts of high concentrations of new urban growth in DACs along the socio-economic, educational, environmental, and transportation dimensions identified in Mathur and Ferrell (2024)?¹⁹

RQ 2: What are the literature-suggested tools that could be used to mitigate these impacts?

RQ 3: What are the most suitable DACs in the S.F. Bay Area and SoCal regions to examine for this study?

RQ 4: What tools are being employed or could be employed in these DACs to avoid the negative unintended impacts identified while answering RQ1?

RQ 5: Qualitatively, how well are the negative impacts of urban growth being mitigated in the case study DACs?

¹⁷ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

¹⁸ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

¹⁹ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

The impacts of demographic and economic disadvantages are intertwined, and common approaches and strategies are often employed to address them. For example, local economic development helps mitigate the negative impacts of concentrated minorities and reduce poverty. Similarly, minimum guaranteed income helps single-parent households (a sub-dimension under the demographic dimension) and reduces poverty overall (a sub-dimension under the economic dimension). Therefore, we consolidate these two dimensions (and their sub-dimensions) under one socio-economic dimension, especially to assess the strategies being used to mitigate the disadvantages.

1.3 Methodology

1.3.1 Methodology to answer RQs 1 and 2

The study team reviewed the extant literature to identify (a) unintended negative impacts of high concentrations of new housing in DACs along the dimensions/sub-dimensions identified in Mathur and Ferrell (2024) and (b) tools that could be employed to mitigate these impacts. Key words and phrases such as “disadvantage,” “disadvantaged communities,” and “opportunity communities” were used in tandem with words/phrases denoting disadvantage, such as “displacement,” “poverty,” “affordable housing,” and “air pollution.”²⁰

1.3.2 Methodology to answer RQ 3

First, the study team reviewed Mathur and Ferrell (2024) that identifies the top four jurisdictions each in SoCal and the S.F. Bay Area regions to identify (a) the various dimensions and sub-dimensions of disadvantage (as defined by the previous study) for which these jurisdictions and their neighborhoods are distressed, (b) the spatial locations where the various dimensions and sub-dimensions of disadvantage overlap with areas planned for future growth (that is the PDAs in the S.F. Bay Area and the PGAs and SOIs in the SoCal region), and (c) which specific sub-dimensions of disadvantage overlap with the PDAs and PGAs and SOIs.²¹

Next, the study team reviewed all the PDAs for the S.F. Bay Area and the PGAs and SOIs for the SoCal regions for the top four jurisdictions in each region identified by Mathur and Ferrell (2024), where a large proportion of new urban growth is planned in DACs. The team developed detailed maps from which to choose four case study DACs for further in-depth examination. The criteria for choosing the DACs include (a) the extent and severity of the disadvantage and (b) the

²⁰ Mathur and Ferrell, Are California’s Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

²¹ Mathur and Ferrell, Are California’s Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

potential and the plans for the DACs to accommodate new urban growth through either redevelopment or greenfield development.²²

Finally, applying these criteria, the study team chose four case study DACs: two from the S.F. Bay Area region—West Oakland (WO), located in the City of Oakland, and North Richmond (NR), which is partly in the City of Richmond in Contra Costa County and the rest in the unincorporated Contra Costa County; and two from the SoCal region—Bloomington in the unincorporated San Bernardino County and Florence-Firestone (F-F) in the unincorporated L.A. County.

1.3.3 Methodology to answer RQs 4 and 5

For each case study DAC, the study team conducted an in-depth search for DAC-, jurisdiction-, region-, state-, and federal-level documents to understand the kinds of disadvantages faced by that DAC and the tools that could or are being employed to address the negative impacts of new urban growth in these communities. For example, for WO, these searches led the study team to review the WO Specific Plan (WOSP), the City of Oakland General Plan and other documents, the S.F. Bay Area’s regional plan called the Plan Bay Area 2050, and state- and federal-level tools that could be or are being employed in WO. The documents were searched using key words and phrases (individually or in tandem with words/phrases) denoting disadvantage such as “disadvantaged community,” “displacement,” “food desert,” “air pollution,” and “low-income,” along with keywords for the case study’s location and the governmental entities that have jurisdiction there, such as “Oakland,” “West Oakland,” “City of Oakland,” “Metropolitan Transportation Commission,” and “State of California.”

Next, through the review of these documents and snowballing technique, the study team identified various government officials and community stakeholders/leaders knowledgeable about these communities, including many members of local non-profit organizations, for in-depth interviews to get their opinion on the kinds of disadvantages faced by these DACs, the kinds of new urban growth planned, the negative impacts of this growth on the dimensions/sub-dimensions noted above, steps being undertaken to mitigate the negative impacts, and their qualitative assessment of how well the negative impacts of urban growth are being mitigated in their community.

After that, the study team conducted semi-structured in-depth interviews via video calls. The interviews typically lasted from one to three hours each, with many conducted over several days. For example, for Bloomington, the study team interviewed six people—four from the County of San Bernardino (Community Development Director, Economic Development Director, Deputy

²² Mathur and Ferrell, Are California’s Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

Economic Development Director, and Engineering Manager, San Bernardino County Public Works Department) and two representatives of the non-profit organizations active in Bloomington (Center for Community Action and Environmental Justice, or CCAEJ, and The People’s Collective for Environmental Justice, or PC4EJ). Seven such personnel were interviewed for WO and NR each, and five for F-F, for a total of 25 across the four case studies. These interviews were used to fill information gaps, to gain an in-depth understanding of the disadvantages faced by the case study DACs, to identify the policies implemented or planned to mitigate these disadvantages, and to obtain interviewees’ assessments of the effectiveness of these policies. Finally, these interviews were also used to triangulate the information obtained from document review and other interviews. The interviewees’ responses were recorded on paper and transcribed using word processing software. Then, the transcribed interview notes were emailed to the interviewees to check for factual accuracy and answer any remaining questions.

Next, the study team created tables for each case study DAC summarizing the literature-suggested tools to mitigate the disadvantages and noting whether such tools are being used in the DACs at the PDA, city, regional, state, and federal levels. Nine such tables per case study DAC were created—one for the socio-economic dimensions, two for the educational dimension (one for each sub-dimension), three for the environmental dimension (one for each sub-dimension), and three for the transportation dimension (one for TR1 to TR3, the second for TR4, and the third for TR5). For example, see Tables 4.1 to 4.9 for the WO DAC in Chapter 4.

Finally, the findings from the document analysis and the interviews were synthesized to qualitatively assess the extent to which disadvantages under each dimension are being mitigated in each case study DAC.

2. Literature-Suggested Negative Impacts and Tools to Mitigate Disadvantage

In order to answer RQ 4—what tools are being employed or could be employed in the case study DACs to avoid the negative unintended impacts along the socio-economic, educational, environmental, and transportation dimensions—we conducted a literature search to identify the literature-suggested negative impacts and tools to mitigate them across these dimensions.

2.1 Socio-economic Disadvantages

2.1.1 Impacts

The extant literature notes that concentrating racial minorities often leads to unintended consequences, such as a lack of social cohesion, and increased poverty and their attendant ill effects, such as overcrowded and poor-quality housing, and poor access to healthy food, high-quality health care, and clean air and water.²³

The negative impacts of a single-parent household are largely socio-economic.²⁴ These households are five times more likely to be below the federal poverty level compared to married couple households (30% versus 6%),²⁵ and thus more likely to suffer from the ill effects of poverty noted above. Female-headed single-parent households are more likely to be poor than male-headed households.²⁶ Furthermore, to the extent that single-parent households experience family instability and high parental stress, the children may be affected, resulting in physical, mental, and behavioral health challenges; higher school dropout rates; and lower earning potential.²⁷ Finally, there is some evidence that the adolescents raised in these households may be more likely to be involved in criminal activities.²⁸ In summary, a high concentration of single-parent households is indicative of socio-economic distress.

²³ Cary Wu, “Racial Concentration and Dynamics of COVID-19 Vaccination in the United States,” *SSM – Population Health* 19 (August 18, 2022): 101198, <https://doi.org/10.1016/j.ssmph.2022.101198>.

²⁴ Melissa S. Kearney, *The Two-Parent Privilege: How Americans Stopped Getting Married and Started Falling Behind* (Chicago: University of Chicago Press, 2022), <https://doi.org/10.7208/chicago/9780226818115>.

²⁵ *Child Well-Being in Single-Parent Families*, The Annie E. Casey Foundation, accessed February 9, 2025, <https://www.aecf.org/blog/child-well-being-in-single-parent-families>.

²⁶ Janet C. Gornick, Laurie C. Maldonado, and Amanda Sheely, “Single-Parent Families and Public Policy in High-Income Countries: Introduction to the Volume,” *The ANNALS of the American Academy of Political and Social Science* 702, no. 1 (2022), <https://doi.org/10.1177/00027162221133250>.

²⁷ *Child Well-Being in Single-Parent Families*.

²⁸ Janique Kroese, Wim Bernasco, Aart C. Liefbroer, and Jan Rouwendal, “Growing up in Single-Parent Families and the Criminal Involvement of Adolescents: A Systematic Review,” *Psychology, Crime & Law* 26, no. 1 (2020), <https://doi.org/10.1080/1068316X.2020.1774589>.

A lack of affordable housing and the concentration of poverty have multi-layered and multi-dimensional, often intertwined and mutually reinforcing, negative impacts at the individual, household, and societal levels. For example, they lead to poorer educational outcomes for children due to frequent residential and, in turn, school mobility; families living in low-quality houses to save on housing costs; families living in low-resource areas with low-quality schools and neighborhoods; and a lack of family funds to invest in children.²⁹ Frequent changing of residences also disrupts social ties.³⁰ At the household level, spending a large proportion of income on housing costs leads to under-spending on other essential items, such as food and health care, and causes overall financial stress.³¹ Additionally, living in lower-quality housing to mitigate high housing costs often leads to living in houses with poor ventilation, pest infestation, mold, and a lack of protection from extreme heat and cold.³²

To the extent that affordable housing is located in low-quality neighborhoods, it could lead to (a) physical insecurity and mental stress if the neighborhood is high-crime, (b) low physical and mental health and overall well-being if it lacks access to parks, libraries, fresh food, and other neighborhood-level amenities,³³ and (c) poorer economic outcomes if it lacks networking opportunities to find jobs and poor transportation accessibility to reach employment locations. Finally, unaffordable housing negatively impacts the economic competitiveness of metropolitan areas, too, because high housing costs make it difficult to recruit and retain employees.³⁴

Apart from the negative outcomes noted above, the concentration of poverty could lead to less time for civic engagement³⁵ and the inability to participate in political, policy-making, and implementation processes or to oppose policies that negatively impact them.³⁶ Furthermore, in the U.S., the concentration of poverty is often highly correlated with the concentration of ethnic

²⁹ Jennifer Jellison Holme, “Growing Up as Rents Rise: How Housing Affordability Impacts Children,” *Review of Educational Research* 92, no. 6 (2022), <https://doi.org/10.3102/00346543221079416>.

³⁰ Craig E. Pollack et al., “The Impact of Public Housing on Social Networks: A Natural Experiment,” *American Journal of Public Health* 104, no. 9 (2014): 1642–49, <https://doi.org/10.2105/AJPH.2014.301949>.

³¹ Shomon Shamsuddin and Colin Campbell, “Housing Cost Burden, Material Hardship, and Well-Being,” *Housing Policy Debate* 32, no. 3 (2022): 413–32, <https://doi.org/10.1080/10511482.2021.1882532>.

³² Roshanak Mehdipanah, “Without Affordable, Accessible, and Adequate Housing, Health Has No Foundation,” *Health Expectations*, first published April 25, 2023, <https://doi.org/10.1111/1468-0009.12626>.

³³ Shamsuddin and Campbell, “Housing Cost Burden”; Tama Leventhal and Sandra Newman, “Housing and Child Development,” *Children and Youth Services Review* 32, no. 9 (2010): 1165–1174, <https://doi.org/10.1016/j.childyouth.2010.03.008>; Sandra J. Newman, “Does Housing Matter for Poor Families? A Critical Summary of Research and Issues Still to Be Resolved,” *Journal of Policy Analysis and Management* 27, no. 4 (2008): 895–925, <https://doi.org/10.1002/pam.20381>.

³⁴ Jerry Anthony, “Housing Affordability and Economic Growth,” *Housing Policy Debate* 33, no. 5 (2023): 1187–1205, <https://doi.org/10.1080/10511482.2022.2065328>.

³⁵ Thomas J. Stopka, Wenhui Feng, Laura Corlin, et al., “Assessing Equity in Health, Wealth, and Civic Engagement: A Nationally Representative Survey, United States, 2020,” *International Journal for Equity in Health* 21, no. 12 (2022), <https://doi.org/10.1186/s12939-021-01609-w>.

³⁶ Pablo Beramendi and Christopher J. Anderson, *Democracy, Inequality, and Representation* (New York: Russell Sage Foundation, 2008).

and racial minorities, making the poor susceptible to structural racism, resulting in devaluation of home values, poor quality education, higher rates of incarceration, poor quality neighborhoods, and low employment access.³⁷

2.1.2 Literature-suggested tools to mitigate socio-economic disadvantages

Most of the literature-suggested tools used to address race-related disadvantage are targeted either to reduce the concentration of poverty or to increase household incomes through economic development strategies, and are germane to this research because racial minorities also tend to be lower-income.

In the U.S., housing policies are the primary poverty and racial minority deconcentration tool. They have also been used as an economic development tool by providing affordable housing in high-opportunity areas with high household incomes, which are close to jobs and high-quality schools and have high transportation accessibility. The federal low-income housing tax credit (LIHTC) and housing choice voucher (HCV) programs aim to do this. Furthermore, housing policies incentivize mixed-income housing in low-income neighborhoods to increase the average household incomes through tools such as inclusionary zoning, density bonuses, and other developer incentives.³⁸ However, the first strategy runs the risk of low-income households not integrating well in the high-resource neighborhoods and losing their social networks, and the second runs the risk of gentrifying low-income neighborhoods.

The other set of strategies seeks to strengthen low-income neighborhoods through “place-based” strategies with the hope that stronger neighborhoods would mitigate many of the unintended negative impacts of concentrated poverty and racial minorities, such as high crime and poor access to jobs and good-quality housing. These strategies primarily aim to improve the neighborhood quality through redevelopment and infrastructure upgrades, and by attracting jobs. The federally funded Community Development Block Grant (CDBG) program³⁹ and

³⁷ Nia Heard-Garris et al., “Structuring Poverty: How Racism Shapes Child Poverty, Child, and Adolescent Health,” *Academic Pediatrics* 21, no. 8 Suppl (Nov–Dec 2021): S108–S116, <https://doi.org/10.1016/j.acap.2021.05.026>.

³⁸ Kirk McClure and Alex F. Schwartz, “Neighbourhood Opportunity, Racial Segregation, and the Low-Income Housing Tax Credit Program in the United States,” *Housing Studies* 36, no. 10 (2021): 1459–1481, <https://doi.org/10.1080/02673037.2021.1950646>; Cameron Williams, Twyla Blackmond-Larnell, and April Eddie, “Race and Poverty Deconcentration Initiatives: The Salience of Race in Subsidized Housing Redevelopment in Chicago,” *Journal of African American Studies* 27 (2023): 142–158, <https://doi.org/10.1007/s12111-023-09620-x>; Evan J. Soltas, “The Price of Inclusion: Evidence from Housing Developer Behavior,” *The Review of Economics and Statistics* 106, no. 6 (2024): 1588–1606, https://doi.org/10.1162/rest_a_01231.

³⁹ McCullough, M. “Place-Based Policy and Neighborhood Business Density: Impacts of the Community Development Block Grant Program.” *Urban Affairs Review* 61, no. 1 (2025): 161–188. <https://doi.org/10.1177/10780874241241255>; U.S. Department of Housing and Urban Development, “CDBG Entitlement Program Eligibility Requirements,” *HUD Exchange*, last modified August 31, 2023, <https://www.hudexchange.info/programs/cdbg-entitlement/cdbg-entitlement-program-eligibility-requirements/#:~:text=Eligible%20Activities,and%20job%20creation/retention%20activities>.

investment in disadvantaged neighborhoods through the Community Reinvestment Act (CRA)⁴⁰ are two such tools.

Public-health-focused literature calls for reducing racial/ethnic disparities in access to quality health care by “raising public and provider awareness of racial/ethnic disparities in care, expanding health insurance coverage, improving the capacity and number of providers in underserved communities, and increasing the knowledge base on causes and interventions to reduce disparities.”⁴¹

Literature on enhancing low-income minority communities’ access to healthy food points to several strategies such as (a) including healthier food items in school nutrition programs,⁴² (b) expanding access to food assistance programs and including healthy food options in their list of eligible items and excluding unhealthy items such as sugary drinks,⁴³ (c) requiring food nutrition labels that prominently display calorie count and added sugar information,⁴⁴ and (d) offering financial and other incentives to grocery stores that offer healthy foods to locate in low-income minority communities.⁴⁵

Finally, the literature points to several local and regional economic development tools. These include increasing businesses’ competitiveness (for example, through soft loans and incentives), improving basic education, implementing job-creation and workers-training programs,⁴⁶ revitalizing neighborhoods, and locating jobs in high-quality communities.⁴⁷

⁴⁰ Mee Jung Kim, “Impact of the Community Reinvestment Act on Small Business Employment in Lower Income Neighborhoods,” *Regional Science and Urban Economics* 98 (January 2023): 103837, <https://doi.org/10.1016/j.regsciurbeco.2022.103837>.

⁴¹ Kaiser Family Foundation, “Eliminating Racial/Ethnic Disparities in Health Care: What Are the Options?” October 20, 2008, accessed February 26, 2025, <https://www.kff.org/racial-equity-and-health-policy/issue-brief/eliminating-racial-ethnic-disparities-in-health-care-what/>.

⁴² Food Research & Action Center (FRAC), *School Meals Are Essential for Student Health and Learning*, August 2019, accessed December 12, 2025, 1, https://frac.org/wp-content/uploads/School-Meals-are-Essential-Health-and-Learning_FNL.pdf.

⁴³ Emmanuel Ezekekwe, Sonali S. Salunkhe, J’Aime C. Jennings, and Brandy N. Kelly Pryor, “Community-Based and System-Level Interventions for Improving Food Security and Nutritious Food Consumption: A Systematic Review,” *Journal of Hunger & Environmental Nutrition* (2021), <https://doi.org/10.1080/19320248.2021.2021120>.

⁴⁴ Yue Huang et al., “Impact of Food Policy Options on Cardiometabolic Mortality: A Microsimulation Study,” *Circulation* 139 (June 4, 2019): 2613–2624, <https://doi.org/10.1161/CIRCULATIONAHA.118.036751>

⁴⁵ Growing Food Connections, *Incentivizing the Sale of Healthy and Local Food: Communities of Innovation Planning & Policy Brief* (University at Buffalo, February 2016), accessed December 12, 2025, https://growingfoodconnections.org/wp-content/uploads/sites/3/2015/11/GFCHealthyFoodIncentivesPlanningPolicyBrief_2016Feb-1.pdf.

⁴⁶ Emil Malizia, Edward J. Feser, Henry Renski, and Joshua Drucker, *Understanding Local Economic Development*, 2nd ed. (Abingdon, Oxon: Routledge, 2021).

⁴⁷ Institute for Local Government, “Economic Development Tools,” 2015, accessed February 26, 2025, <https://www.ca-ilg.org/hn-online-guide/economic-development-tools>.

2.1.3 Tools to mitigate single-parent household-related disadvantage

Rees et al. suggest various tools to support single-parent households.⁴⁸ These include providing affordable childcare and affordable housing, education and job training for parents, and robust child support mechanisms, including support for trusted adults. Finally, a guaranteed minimum income would also help.⁴⁹

2.2 Education-related Disadvantages

2.2.1 Impacts

Low education is associated with several negative outcomes, including lower earnings and decreased employment opportunities,⁵⁰ reduced life expectancy,⁵¹ and overall poorer health.⁵²

Adults in the US who had less than a high school diploma earned less than half of what those with a bachelor's degree or higher earned. In addition to lower earnings, they were three times more likely to die before the age of 65.⁵³

⁴⁸ Echave Rees, Scott Necsoi Beeber, Russell Sampson, and Jeynes Pickett Lietz, "Empowering Single Parents: Navigating Socio-Economic Challenges and Fostering Resilience in Family Well-Being," *Law and Economics* 17, no. 2 (2023), <https://journals.ristek.or.id/index.php/LE/article/view/5>.

⁴⁹ Elise Aerts, Ive Marx, and Zachary Parolin, "Income Support Policies for Single Parents in Europe and the United States: What Works Best?" *The Annals of the American Academy of Political and Social Science* 702, no. 1 (2022): 55–76, <https://doi.org/10.1177/00027162221120448>.

⁵⁰ Jesse Rothstein and Diane Whitmore Schanzenbach, "Does Money Still Matter? Attainment and Earnings Effects of Post-1990 School Finance Reforms," *Journal of Labor Economics* 40, no. S1 (April 2022): S1-S42; Heike Solga, "Stigmatization by Negative Selection': Explaining Less-Educated People's Decreasing Employment Opportunities," *European Sociological Review* 18, no. 2 (June 1, 2002): 159–178, <https://doi.org/10.1093/esr/18.2.159>.

⁵¹ Robert M. Kaplan, Michael L. Spittel, and Tia L. Zeno, "Educational Attainment and Life Expectancy," *Annals of Epidemiology* 1, no. 1 (2014), <https://doi.org/10.1177/2372732214549754>.

⁵² Anna Zajacova and Elizabeth M. Lawrence, "The Relationship Between Education and Health: Reducing Disparities Through a Contextual Approach," *Annual Review of Public Health* 39 (2018): 273–289, <https://doi.org/10.1146/annurev-publhealth-031816-044628>.

⁵³ Amber D. Haley et al., "Neighborhood-Level Determinants of Life Expectancy in Oakland, CA," (Richmond, VA: Virginia Commonwealth University, Center on Human Needs, September 2012), https://societyhealth.vcu.edu/media/society-health/pdf/PMReport_Alameda.pdf.

2.2.2 Literature-suggested tools to mitigate education-related disadvantage

The literature-suggested strategies to mitigate education-related disadvantage either focus on improving the overall level of education at the neighborhood level or the quality of K–12 education. Those focusing on the former include labor-market relevant educational programs and partnerships with employers to develop educational programming; targeted outreach to early school leavers, adults, racial minorities, and other socio-economically disadvantaged populations; financial assistance to take classes and availability of online/hybrid courses; provision of local/community learning centers; and availability of guidance and counseling services.

Strategies to improve the quality of K–12 education include enhancing teacher quality through higher salaries, professional development opportunities, and performance-based pay.⁵⁴ The second set of strategies focuses on core instruction and includes evidence-based literacy instruction,⁵⁵ personalized/individualized learning models,⁵⁶ inquiry-based and active learning,⁵⁷ and targeted interventions and data-driven adjustments.⁵⁸

The final set of strategies focuses on systemic and equity-focused reforms, and includes school finance reform,⁵⁹ standards-based reform,⁶⁰ strengthening college and career pathways,⁶¹ and equitable use of technology.⁶²

⁵⁴ Thomas C. Dawson and K. Lloyd Billingsley, *Unsatisfactory Performance: How California’s K–12 Education System Protects Mediocrity and How Teacher Quality Can Be Improved* (September 2000), <https://eric.ed.gov/?id=ED453152>.

⁵⁵ Education Northwest, “Literacy Lens: Effective Literacy Practices for Secondary Students,” accessed December 8, 2025, <https://educationnorthwest.org/insights/literacy-lens-effective-literacy-practices-secondary-students>.

⁵⁶ Stand Together, “7 Student-First Solutions for Education That Can Make a Difference,” accessed December 8, 2025, <https://standtogether.org/stories/education/ways-to-improve-the-quality-of-education-in-the-us>.

⁵⁷ Nancy P. Moreno, “K–12 Science Education Reform – A Primer for Scientists,” *BioScience* 49, no. 7 (July 1999): 569–576, <https://doi.org/10.2307/1313477>.

⁵⁸ Hanover Research, “8 Ways to Close the Achievement Gap in Schools,” June 5, 2024, accessed December 8, 2025, <https://www.hanoverresearch.com/insights-blog/k-12-education/k-12-closing-the-achievement-gap/>.

⁵⁹ Michael W. Kirst, *Standards-Based Education Reforms: Looking Back to Look Forward* (Learning Policy Institute, October 31, 2024), <https://learningpolicyinstitute.org/product/standards-based-education-reforms-report>.

⁶⁰ Kirst, *Standards-Based Education Reforms*.

⁶¹ Weadé James, “K–12 Education: Transforming Public Education for a Changing World,” *Center for American Progress*, November 4, 2024, <https://www.americanprogress.org/article/a-progressive-vision-for-education-in-the-21st-century/k-12-education-transforming-public-education-for-a-changing-world/>.

⁶² James, “K–12 Education.”

2.3 Environment-related Disadvantages

2.3.1 Impacts

Environmental pollution in the form of air and ground pollution and exposure to lead have several negative health impacts. Fine particulate matter in air causes “strokes, heart diseases, lung cancer, and acute and chronic respiratory diseases.”⁶³

Lead exposure is most likely from lead paint from homes built before 1978 and lead contamination in the soil, which creates multiple sources of lead exposure.⁶⁴ Lead is particularly toxic to children. In children, lead exposure can cause brain and nervous system damage that impact a child’s development. Children exposed to lead may have learning and behavioral issues, as well as hearing and speech problems. The impact on development can impede learning at school by affecting intelligence and the ability to pay attention.⁶⁵

Ground pollution can harm in several ways, too. Toxic chemicals can contaminate ground and surface water. Contaminated soil can affect dry areas by becoming airborne, traveling by wind, entering waterways, and embedding in sediment. Contaminated water and soil can pose serious hazards to humans, animals, and plants when inhaled, ingested, or through skin contact. Although the level of risk is different based on exposure, the impact can be acute or chronic.⁶⁶

2.3.2 Literature-suggested tools to mitigate environmental disadvantage

Strategies to mitigate groundwater contamination: The literature suggests several approaches to prevent or reduce groundwater contamination. These include proper landfill design comprising a “bottom liner, leachate collecting system and the cover,” enacting laws to prevent contamination, and imposing penalties for violating water quality standards.⁶⁷ Other tools include educational campaigns to increase awareness of local and regional watersheds and disseminate information about suitable ways to dispose waste, identify and isolate contaminated zones, prevent soil erosion by paving open areas, and reduce sediment-containing surface runoff

⁶³ World Health Organization, “How Air Pollution Is Destroying Our Health,” *Newsroom Spotlight*, accessed December 12, 2025, <https://www.who.int/news-room/spotlight/how-air-pollution-is-destroying-our-health>.

⁶⁴ Alameda County Public Health Department, *Health and Housing in Oakland: Housing Habitability and Public Health* (Oakland: Alameda County Public Health Department, 2014), <https://www.acgov.org/cda/lead/documents/news/health,housingoakland.pdf>, 7.

⁶⁵ Centers for Disease Control and Prevention, “Lead Exposure Symptoms and Complications,” *Childhood Lead Poisoning Prevention*, accessed December 12, 2025, <https://www.cdc.gov/lead-prevention/symptoms-complications/index.html>.

⁶⁶ U.S. Environmental Protection Agency, “Contaminated Land,” *Report on the Environment*, accessed December 12, 2025, <https://www.epa.gov/report-environment/contaminated-land>.

⁶⁷ Ilma Arshad and Rashid Umar, “Urban Groundwater Pollution: Causes, Impacts and Mitigation,” in *Current Directions in Water Scarcity Research*, ed. Ashwani Kumar Tiwari, Amit Kumar, Abhay Kumar Singh, T.N. Singh, Enrico Suozzi, Gagan Matta, and Stefano Lo Russo, vol. 5 (Elsevier, 2022), 379–397, <https://doi.org/10.1016/B978-0-323-85378-1.00019-2>.

by using sandbags and silt traps.⁶⁸ Finally, the literature calls for monitoring underground fuel and chemical tanks, creating a zone of protection around wells, regularly inspecting and pumping septic tanks, and controlling the kind of uses allowed in the recharge area of aquifers.⁶⁹

Strategies to mitigate air pollution

A meta-analysis of global peer-reviewed literature classified strategies to reduce air pollution—specifically urban air pollution—into two broad sets.⁷⁰

The first set targets specific pollutants, including particulate matter, sulphur dioxide, ozone, and volatile organic compounds. The second set includes broader strategies that don't target specific pollutants but focus on the larger regulatory and economic frameworks and the sectors of the economy that generate air pollution.

Under the second set, the study notes the need for overarching legislation such as the U.S. Clean Air Act and economic policies such as incentives to reduce carbon emissions, tax on emissions, subsidies for pollution abatement, regional cooperation to mitigate air pollution, and strengthening public sector environmental supervision. This set also includes strategies focused on the transport, energy, and industrial sectors. Additionally, EPA calls for emissions trading, banking, and caps.⁷¹

Under the transport sector, the major strategies include expanding and electrifying public transportation, incentivizing electric vehicles, imposing traffic congestion charges and higher parking charges to dissuade auto use, encouraging employers to provide incentives for employees to use public transport and biking, setting higher vehicular emission and fuel

⁶⁸ Nirankar Singh, Twinkle Poonia, Samarjeet Singh Siwal, Arun Lal Srivastav, Harish Kumar Sharma, and Susheel K. Mittal, "Challenges of Water Contamination in Urban Areas," in *Current Directions in Water Scarcity Research*, ed. Arun Lal Srivastav, Sugghosh Madhav, Abhishek Kumar Bhardwaj, and Eugenia Valsami-Jones, vol. 6 (Elsevier, 2022), 173–202.

⁶⁹ Connecticut Department of Energy & Environmental Protection, "What We Can All Do to Reduce Groundwater Pollution," accessed March 15, 2025, <https://portal.ct.gov/deep/aquifer-protection-and-groundwater/groundwater/understanding-ground-water/what-we-can-all-do-to-reduce-groundwater-pollution>; Santa Clara Valley Water District, "Top 10 Ways to Protect and Conserve Groundwater," accessed February 26, 2025, <https://www.valleywater.org/sites/default/files/2018-01/Top%2010%20ways%20to%20protect%20and%20conserve%20groundwater.pdf>; Ruth Patrick, "What Should Be Done to Mitigate Groundwater Contamination?" *Environmental Health Perspectives* 86 (1990): 239–243, <https://pmc.ncbi.nlm.nih.gov/articles/instance/1567757/pdf/envhper00419-0229.pdf>.

⁷⁰ A. Jonidi Jafari, E. Charkhloo, and H. Pasalari, "Urban Air Pollution Control Policies and Strategies: A Systematic Review," *Journal of Environmental Health Science and Engineering* 19 (December 2021): 1911–1940, <https://doi.org/10.1007/s40201-021-00744-4>.

⁷¹ U.S. Environmental Protection Agency, "Managing Air Quality – Control Strategies to Achieve Air Pollution Reductions," accessed March 13, 2025, <https://www.epa.gov/air-quality-management-process/managing-air-quality-control-strategies-achieve-air-pollution>.

standards, concentrating development around transit stations, and dedicating lanes for zero/low emission vehicles.

In the energy sector, the literature calls for using non-coal-based clean energy sources, such as solar, and for providing incentives to install energy-efficient devices. Within the industrial sector, the major strategies include promoting technological advancement for cleaner industrial production, raising emission standards and fines for non-compliance, better monitoring of industry-generated air pollution, and eliminating or relocating highly polluting industries.

The strategies noted are also part of the first set, which targets specific pollutants. For example, expanding and electrifying public transportation and promoting electric vehicles help reduce particulate matter and sulphur dioxide emissions.

In addition to the above-noted strategies, the literature also suggests enhanced air pollution monitoring and modeling, promotion of pedestrian and bike safety, and roadside vegetation to reduce air pollution.⁷²

Strategies to mitigate exposure to lead

The literature calls for strong, strictly enforced “lead poisoning prevention programs with nearly universal screening and widespread public education.”⁷³ The public should be informed about the harmful effects of lead poisoning and how to prevent exposure. Furthermore, sources of lead contamination should be identified and eliminated. For example, lead-containing paint and water pipes should be replaced, and soils with high lead concentrations should be chemically treated. While renovating homes built before 1978 (when lead in paint was common), extreme precaution should be taken to prevent exposure to lead-contaminated dust.⁷⁴ Finally, recognizing that low-income minority communities are disproportionately impacted by lead poisoning, a community-wide approach that targets the roots of structural racism should be adopted. This approach calls for job creation, small business development, provision of affordable housing, and improving social cohesion in these marginalized communities.⁷⁵

⁷² Daniele Sofia, Filomena Gioiella, Nicola Lotrecchiano, et al., “Mitigation Strategies for Reducing Air Pollution,” *Environmental Science and Pollution Research* 27 (2020): 19226–19235, <https://doi.org/10.1007/s11356-020-08647-x>.

⁷³ Mary Jean Brown, Jane Gardner, James D. Sargent, Katherine Swartz, Howard Hu, and Ralph Timperi, “The Effectiveness of Housing Policies in Reducing Children’s Lead Exposure,” *American Journal of Public Health* 91, no. 4 (2001): 623.

⁷⁴ Benjamin F. Swaringen, Emory Gawlik, and George D. Kamenov, “Children’s Exposure to Environmental Lead: A Review of Potential Sources, Blood Levels, and Methods Used to Reduce Exposure,” *Environmental Research* 204, pt. B (2022): 112025, <https://doi.org/10.1016/j.envres.2021.112025>.

⁷⁵ Emily A. Benfer, Emily Coffey, and Allyson E. Gold, “Health Justice Strategies to Eradicate Lead Poisoning: An Urgent Call to Action to Safeguard Future Generations,” *Yale Journal on Regulation* 19, no. 2 (2022): 146–209, https://openyls.law.yale.edu/bitstream/handle/20.500.13051/5962/Benfer_v19n2_146_209.pdf.

2.4 Transportation Disadvantage

2.4.1 Impacts

Low-density, auto-oriented mobility development patterns and transportation infrastructure have large and multivariate impacts on society as a whole, and on disadvantaged communities in particular. Among these are increased driving, reduced physical activity, increased obesity, traffic collisions and fatalities, lack of access to jobs and critical services, and increased costs for housing, energy, and transportation overall.⁷⁶ Higher transportation accessibility that comes from walkable streets, compact urban form, and ubiquitous and frequent transit services brings direct and measurable benefits to disadvantaged communities, providing opportunities for upward economic mobility.⁷⁷

2.4.2 Literature-suggested tools to mitigate transportation disadvantages

Tools from the literature to enhance the five dimensions of transportation impacts on disadvantaged communities include measures aimed at auto household mobility (sub-dimension 1) and local non-auto mobility (sub-dimensions 2 and 3) through investments in transit, walking, and bicycling infrastructure to support transit-serving land use patterns,^{78,79} tools that implement traffic-calming, and other transportation demand management infrastructure, programs, and policies to discourage auto-use.⁸⁰ Efforts to increase higher density and diverse urban form patterns include the promotion of higher-density, mixed-use, infill, transit-oriented development and help address overall local/neighborhood accessibility (sub-

⁷⁶ Reid Ewing and Shima Hamidi, *Costs of Sprawl* (New York, NY: Taylor & Francis, 2017); Reid Ewing, Gail Meakins, Shima Hamidi, Arthur C. Nelson, "Relationship Between Urban Sprawl and Physical Activity, Obesity, and Morbidity—Update and Refinement," *Health & Place* 26 (2014): 118–26, <https://doi.org/10.1016/j.healthplace.2013.12.008>; Reid Ewing and Fang Rong, "The Impact of Urban Form on U.S. Residential Energy Use." *Housing Policy Debate* 19, no.1 (2008): 1–30. <https://doi.org/10.1080/10511482.2008.9521624>; Reid Ewing and Robert Cervero, "Travel and the Built Environment: A Meta-Analysis," *Journal of the American Planning Association* 76, no. 3 (2010): 265–94, <https://doi.org/10.1080/01944361003766766>.

⁷⁷ Reid Ewing, Shima Hamidi, James B. Grace, and Yehua Dennis Wei, "Does urban sprawl hold down upward mobility?" *Landscape and Urban Planning*, 148 (2016): 80–88, ISSN 0169-2046, <https://doi.org/10.1016/j.landurbplan.2015.11.012>.

⁷⁸ Christopher Ferrell, Michael Carroll, and Bruce Appleyard, *Reinventing the Urban Interstate: A New Paradigm for Multimodal Corridors*, Transit Cooperative Research Program Report No. 145 (Washington, DC: Transportation Research Board, 2012), <https://www.nap.edu/catalog/14579/reinventing-the-urban-interstate-a-new-paradigm-for-multimodal-corridors>.

⁷⁹ Robert Cervero and Michael Duncan, "Walking, Bicycling, and Urban Landscapes: Evidence from the San Francisco Bay Area," *American Journal of Public Health* 93, no. 9 (2003): 1478–1483, <https://doi.org/10.2105/AJPH.93.9.1478>.

⁸⁰ Jonas X. Hagen, "Traffic Calming and Environmental Justice: New York City's Neighborhood Slow Zones," *Transportation Research Record* 2672, no. 3 (2018): 175–184.

dimension 4).⁸¹ Finally, regional accessibility to jobs and services through regional land use planning, corridor planning, jobs/housing balance,⁸² the promotion of affordable housing,⁸³ and a diverse set of employment options within disadvantaged communities and accessible by transit if outside them⁸⁴ address sub-dimension 5 (regional transit accessibility). The jobs-housing balance is the notion that commute distances are reduced when workplaces and housing are closer together. This is a transportation policy tool that is measured by the ratio of jobs to people or housing in a given area. People living closer to where they work reduces auto dependency and VMT, which, in turn, reduces greenhouse gas (GHG) emissions, road construction and maintenance needs, and socio-economic segregation, and lowers housing costs.⁸⁵

⁸¹ Reid Ewing and Robert Cervero, "Travel and the Built Environment: A Synthesis," *Transportation Research Record* 1780, no. 1 (2001): 87–114, <https://doi.org/10.3141/1780-10>; Robert Cervero and Kara Kockelman, "Travel Demand and the 3Ds: Density, Diversity, and Design," *Transportation Research Part D: Transport and Environment* 2, no. 3 (1997): 199–219, [https://doi.org/10.1016/S1361-9209\(97\)00009-6](https://doi.org/10.1016/S1361-9209(97)00009-6); Robert Cervero, Steven Murphy, Christopher Ferrell, Natasha Goguts, and Yu-Hsin Tsai, *Transit-Oriented Development in the United States: Experiences, Challenges, and Prospects*, Transit Cooperative Research Program Report No. 102 (Washington, DC: Transportation Research Board, 2004), <https://www.nap.edu/catalog/23360/transit-oriented-development-in-the-united-states-experiences-challenges-and-prospects>.

⁸² Christopher Ferrell, Michael Carroll, and Bruce Appleyard, *Reinventing the Urban Interstate: A New Paradigm for Multimodal Corridors*, Transit Cooperative Research Program Report No. 145 (Washington, DC: Transportation Research Board, 2012), <https://www.nap.edu/catalog/14579/reinventing-the-urban-interstate-a-new-paradigm-for-multimodal-corridors>; Christopher Ferrell, Bruce Appleyard, and Marc Taecker, *Livable Transit Corridors: Methods, Metrics and Strategies*, Transit Cooperative Research Program Report No. 187 (Washington, DC: Transportation Research Board, 2017); Robert Cervero, *Accessible Cities and Regions: A Framework for Sustainable Transport and Urbanism in the 21st Century*, UCB-ITS-VWP-2005–3 (Berkeley, CA: UC Berkeley Center for Future Urban Transport, August 2005), <https://escholarship.org/content/qt27g2q0cx/qt27g2q0cx.pdf>.

⁸³ Tridib Banerjee, Ajay Garde, Deepak Bahl, Hue-Tam Jamme, Nida Ahmed, Elizabeth Joun, and Pacific Southwest Region University Transportation Center, *Increasing Access, Mobility, and Shelter Opportunities for Disadvantaged Populations: Affordable Housing in Transit-Oriented Developments*, Report No. PSR-19-09 (Sacramento: California Department of Transportation, Division of Research and Innovation, 2021).

⁸⁴ Kathryn F. Anderson and Joseph Galaskiewicz, "Racial/Ethnic Residential Segregation, Socioeconomic Inequality, and Job Accessibility by Public Transportation Networks in the United States," *Spatial Demography* 9, no. 3 (2021): 341–373.

⁸⁵ Marlon G. Boarnet, Hsin-Ping Hsu, and Susan Handy, *Impact of Jobs-Housing Balance on Passenger Vehicle Use and Greenhouse Gas Emissions: Policy Brief* (Sacramento: California Air Resources Board, September 30, 2014), accessed May 9, 2025, https://ww2.arb.ca.gov/sites/default/files/2020-06/Impact_of_Jobs-Housing_Balance_on_Passenger_Vehicle_Use_and_Greenhouse_Gas_Emissions_Policy_Brief_0.pdf.

3. Federal-, State-, and Regional-Level Tools to Mitigate Disadvantage

In order to answer RQ 4—what tools are being employed or could be employed in the case study DACs to avoid the negative unintended impacts along the socio-economic, educational, environmental, and transportation dimensions—we conducted a literature search to identify the commonly-used federal-, state-, and regional-level tools that are or could be employed. Such a tool identification also avoids repetition in the subsequent case study chapters. Since all the case study DACs are in California, the federal- and state-level tools are common to all four DACs. The section describing the regional-level tools are divided into sub-sections—one for the S.F. Bay Area and the other for the SoCal region.⁸⁶

A qualitative assessment of the effectiveness of these tools to mitigate disadvantages in the case study DACs is conducted in the subsequent case study chapters (Chapters 4 to 7). In addition to assessing the impact of federal-, state-, and regional-level tools discussed here, Chapters 4 to 7 will also discuss and evaluate the effectiveness of the case study- and jurisdiction-level tools.

3.1 Socio-economic Dimension

3.1.1 Federal-level tools

The majority of tools to remove socio-economic disadvantage focus on housing and economic development.

Housing tools

These include the large federal affordable housing funding programs such as housing choice vouchers program (including Section 8 vouchers), LIHTC, CDBG, and HOME funds. The federal HOME Investment Partnerships Program provides grants to cities and counties and low-interest loans to developers and nonprofit Community Housing Development Organizations (CHDOs) to develop affordable housing.⁸⁷ CDBG provides annual grants to states, cities, and counties with a population of at least 50,000 to provide suitable housing and economic development for low to moderate income people.⁸⁸ Furthermore, the Community Reinvestment Act (CRA) requires

⁸⁶ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

⁸⁷ California Department of Housing and Community Development, "HOME Investment Partnerships Program (HOME), California HCD Grants & Funding, accessed July 11, 2025, <https://www.hcd.ca.gov/grants-and-funding/programs-active/home-investment-partnerships-program>.

⁸⁸ U.S. Department of Housing and Urban Development. *Community Development Block Grant Program*. Accessed April 17, 2025. <https://www.hud.gov/hud-partners/community-cdbg>.

financial institutions to reinvest in communities where they operate.⁸⁹ The eligible activities to meet CRA requirements include lending to low and moderate income (LMI) individuals or businesses in the form of mortgages and business loans, providing credit counseling to LMI individuals and households, and investing in affordable housing and revitalization projects.⁹⁰

Non-housing tools

These primarily include small business loans. Apart from the financial institutions' lending to small businesses under CRA, the U.S. Small Business Administration (SBA) at the federal level⁹¹ and the California Infrastructure and Economic Development Bank (IBank) at the state level also provide small business loans directly or through partner lenders, or guarantee the loans.⁹²

3.1.2 State-level tools

Housing tools

At the state level, the California Housing Finance Agency (CalHFA) is a state program that provides first-time homebuyers with loans, as an effort to reduce foreclosures. Keep Your Home California is another program that assists low to moderate income homeowners with mortgage payments if they lose employment.⁹³ The California Tax Credit Allocation Committee (CTCAC) provides tax credits to private investors who invest in affordable housing in California through the LIHTC Programs.⁹⁴ Moreover, the Affordable Housing and Sustainable Communities (AHSC) Program funds efforts to meet the state's sustainability and equity goals. AHSC funds affordable housing development and transportation projects close to jobs, schools, and other destinations people frequent. Transportation infrastructure projects may include sustainable infrastructure such as bike lanes, sidewalks, trees for shade, and programs that encourage micro-mobility and public transit. Local agencies, transit agencies, housing developers, school/college districts, and other

⁸⁹ Board of Governors of the Federal Reserve System, "Community Reinvestment Act (CRA)," accessed December 8, 2025, https://www.federalreserve.gov/consumerscommunities/cra_about.htm.

⁹⁰ Federal Reserve Banks' Community Development, "CRA: Building Stronger Communities," *Federal Reserve Community Development*, accessed December 8, 2025, <https://fedcommunities.org/cra-building-stronger-communities/>.

⁹¹ U.S. Small Business Administration, "Loans | Funding Programs," accessed December 8, 2025, <https://www.sba.gov/funding-programs/loans>.

⁹² California Infrastructure and Economic Development Bank (IBank), accessed December 8, 2025, <https://www.ibank.ca.gov/>.

⁹³ City of Oakland, "West Oakland Specific Plan, Final Plan," (Oakland, CA: City of Oakland, 2014), <https://oaklandca.s3.us-west-1.amazonaws.com/oakca1/groups/ceda/documents/report/oak049130.pdf>, 10-7.

⁹⁴ City of Oakland, "West Oakland Specific Plan, Final Plan," 10-9.

groups in California are eligible to apply.⁹⁵ A minimum of 50% of funding goes towards disadvantaged communities.⁹⁶

Another state program, Permanent Local Housing Allocation Program Non-Entitlement Local Government Competitive Grant Program funds local California governments to assist people who are or at risk of becoming homeless.⁹⁷ Furthermore, Senate Bill 4: Affordable Housing on Faith and Higher Education Lands Act was passed in 2023 to allow for faith-based organizations and nonprofit colleges to build multifamily affordable housing on their properties.⁹⁸

Moreover, the Regional Early Action Planning Grants (REAP) 2.0 program is a state-level grant program designed to speed up progress toward statewide housing targets and climate goals by strengthening collaboration among the state, regional bodies, and local governments. It focuses on promoting infill housing development, lowering VMT, expanding housing availability across all affordability levels, advancing fair housing, and carrying out adopted regional and local plans to achieve these objectives.⁹⁹

Moreover, several affordable housing legislations promote affordable housing through streamlined ministerial reviews and incentives for developers to build more affordable housing. Please see Table 3.1 for a sample of such legislation. Finally, at the state level, several pieces of affordable housing legislation are being considered, such as Senate Bill 1156, which was vetoed by the Governor; he has stated he will reconsider it at a later date.¹⁰⁰ This bill would have allowed cities and counties in California to develop affordable housing through the creation of community development and a housing joint powers authority.¹⁰¹

⁹⁵ California Strategic Growth Council and California Department of Housing and Community Development, "Affordable Housing and Sustainable Communities Program Fact Sheet (May 19, 2023)", accessed June 23, 2025, <https://sgc.ca.gov/grant-programs/ahsc/docs/20230519-AHSC-Program-FactSheet.pdf>.

⁹⁶ California Strategic Growth Council and California Department of Housing and Community Development, "Affordable Housing and Sustainable Communities Program," California Climate Investments, accessed July 3, 2025, <https://www.caclimateinvestments.ca.gov/ahsc>.

⁹⁷ California Department of Housing and Community Development, "2024 Permanent Local Housing Allocation Program: Non-Entitlement Local Government Competitive," California Grants Portal, accessed June 23, 2025, <https://www.grants.ca.gov/grants/2024-permanent-local-housing-allocation-program-non-entitlement-local-government-competitive/>.

⁹⁸ California Housing Partnership. *Los Angeles County Annual Affordable Housing Outcomes Report*. Los Angeles: California Housing Partnership, December 2024, <https://chpc.net/wp-content/uploads/2024/12/Los-Angeles-County-Affordable-Housing-Outcomes-Report-2024.pdf>, 142.

⁹⁹ Southern California Association of Governments, "REAP 2.0," accessed November 24, 2025, <https://scag.ca.gov/reap2021>.

¹⁰⁰ City of Oakland, "West Oakland Specific Plan, Final Plan" (Oakland, CA: City of Oakland, 2014), <https://oaklandca.s3.us-west-1.amazonaws.com/oakca1/groups/ceda/documents/report/oak049130.pdf>, 10-25.

¹⁰¹ California State Senate, "Senate Bill No. 1156" (April 12, 2012), http://www.leginfo.ca.gov/pub/11-12/bill/sen/sb_1151-1200/sb_1156_cfa_20120412_133808_sen_comm.html.

Table 3.1 A Sample of Affordable-Housing-Related State Legislation

Affordable Housing Legislation	Description
Assembly Bill 1287 Bill Title: Density Bonus Law: maximum allowable residential density: additional density bonus and incentives or concessions.	Projects that meet criteria are eligible for additional density bonuses and incentives. Bonuses and incentives can be combined. The bill makes for streamlined approvals for development with the purpose of encouraging more affordable housing.
Senate Bill 9 Bill Title: The California H.O.M.E. ACT.	This bill allows for the development of two housing units on a single-family lot. Depending on the city, up to four units can be built on a single-family lot. This bill streamlines approval for adding additional units by limiting local government restrictions. This bill responds to the housing shortage crisis in California by creating opportunities for small-scale infill development.
Senate Bill 10 Bill Title: Local Control for Increased Housing Density.	SB 9 and SB 10 are sister bills, under the Senate Housing Package called “Building Opportunities for All.” SB10 allows for cities to develop up to 10 units on a single parcel without requiring a review under the California Environmental Quality Act (CEQA). This bill allows for up-zoning residential areas.
Senate Bill 423 Bill Title: Land use: streamlined housing approvals: multifamily housing developments.	SB 423 extends the terms of SB 35, which will sunset in 2026. It streamlines ministerial reviews in jurisdictions that are not meeting RHNA goals for lower income and market rate income housing.

Non-housing tools

At the state level, several economic development and safety-net programs exist. For example, the California Workforce Development Board and the California Labor and Workforce Development Agency have grant funding available to support the High Road Training Partnerships 2025 Grant Program. This funding supports people in underserved communities to access High Road jobs.¹⁰² Under the California Nutrition Incentive Program (CNIP), those receiving CalFresh, Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and Senior Farmers Market Nutrition Program benefits are given financial incentives to purchase fruits and vegetables at farmer’s markets and small businesses. For every dollar of benefits they

¹⁰² California Workforce Development Board, “High Road Training Partnerships: 2025 Grant Program,” California Grants Portal, accessed June 17, 2025, <https://www.grants.ca.gov/grants/high-road-training-partnerships-2025-grant-program/>.

spend on fruits and vegetables, they receive an additional dollar to spend on these items. This program benefits both shoppers and the farmers.¹⁰³

Assembly Bill 581 (California Healthy Food Financing Initiative) was passed in October 2011 to increase food accessibility in underserved communities of California, with the funding coming from private, state, and federal funds. This legislation was modeled after the federal program called Healthy Food Financing Initiative (HFFI) that was introduced in 2010 and made use of existing grant funding.¹⁰⁴

Moreover, the California Air Resource Board (CARB) directs their applicants to prioritize projects using California Climate Investment funds that have the features of high-quality jobs such as living wages, health benefits, sick leave and child care, a reasonable commute, job training, flexibility, valuing employee input, tracking employee advancement with measurable data collection methods, providing safe working conditions, and promoting job retention.¹⁰⁵

Finally, America's Job Center for California (AJCC) is a network for private and public entities that connects those who are seeking employment with employers at no cost.¹⁰⁶ There are 182 American Job Centers in California.¹⁰⁷

3.1.3 Regional-level tools

Regional-level tools: S.F. Bay Area

Housing tools: At the regional level, the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) have proposed the One Bay Area 2050 Plan. This plan aims to meet 80% of the housing needs in PDAs. However, this strategy may have unintended negative consequences if these PDAs are already disadvantaged and the new housing does not come with support to mitigate the disadvantages.¹⁰⁸

¹⁰³ California Department of Food and Agriculture, "California Nutrition Incentive Program (CNIP)," accessed March 1, 2025, <https://cafarmtofork.cdffa.ca.gov/cnip.html>.

¹⁰⁴ California Department of Food and Agriculture, *Improving Food Access in California: Report to the California State Legislature* (Sacramento, CA: CDFA, 2012), 4, accessed March 21, 2025, https://www.cdffa.ca.gov/exec/public_affairs/pdf/ImprovingFoodAccessInCalifornia.pdf.

¹⁰⁵ California Air Resources Board, California Climate Investments: 2018 Funding Guidelines, accessed June 29, 2025, 13, <https://ww2.arb.ca.gov/sites/default/files/auction-proceeds/2018-funding-guidelines.pdf>.

¹⁰⁶ Employment Development Department, "America's Job Center of California", Jobs and Training, accessed July 14, 2025, https://edd.ca.gov/en/jobs_and_training/TCLobby/.

¹⁰⁷ CareerOneStop, "Find America's Job Centers in California", American Job Center Finder, accessed July 14, 2025, <https://www.careeronestop.org/LocalHelp/AmericanJobCenters/find-american-job-centers.aspx?location=California>.

¹⁰⁸ City of Oakland, "West Oakland Specific Plan, Final Plan," (Oakland, CA: City of Oakland, 2014), <https://oaklandca.s3.us-west-1.amazonaws.com/oakca1/groups/ceda/documents/report/oak049130.pdf>, 10-25.

Plan Bay Area 2050 identifies eight broad housing strategies, of which six are relevant to the housing needs of WO and NR. H1: This strategy would cap annual rent increases at the rate of inflation for units that are 10 years or older; H2: This would preserve currently affordable housing for low to moderate-income residents to become permanently affordable through deed restrictions; H3: Enable the growth of different housing types and densities, specifically for PDAs, some Transit-Rich Areas (TRAs), and some High-Resource Areas; H4: Build more affordable housing to meet the housing needs for those who are un-housed and low-income households; H5: All major housing projects must include affordable housing, requiring 10–20% of new market-rate housing developments with five or more units to be affordable for low-income households; and H7: Offer assistance to Equity Priority Communities through targeted mortgage, rental, and small business support, with an emphasis on supporting low-income communities and communities of color who have historically been targeted for predatory lending and exclusion.¹⁰⁹

Non-housing tools: At the regional level, ABAG/MTC's Plan Bay Area 2050 identifies six broad economic strategies of which five are relevant for WO and NR. They are as follows: EC1. Provide a universal basic income statewide to improve the economic situation of households; EC2. Expand job training and programs to support historically disadvantaged communities to establish new businesses and receive job training; EC3: Provide high-speed internet to low-income communities, through subsidies and public infrastructure to facilitate access; EC4: Enable commercial densities in PDAs and TRAs to attract more jobs to be located near transit; and EC5: Incentivize employers to relocate offices to housing-rich areas close to regional rail stations.¹¹⁰

Regional-level tools: SoCal Region

Housing tools: At the regional level, the SCAG's regional plan, called Connect SoCal 2024, identifies seven housing-related policies of which the following three are relevant for Bloomington and F-F:

1. Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and similar) to further fair housing access and equity across the region.
2. Support local, regional, state, and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region.

¹⁰⁹ Metropolitan Transportation Commission and Association of Bay Area Governments, *Plan Bay Area 2050* (October 2021), https://planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_October_2021.pdf, vii.

¹¹⁰ Metropolitan Transportation Commission and Association of Bay Area Governments, *Plan Bay Area 2050*, viii.

3. Support efforts to increase housing and services for people experiencing homelessness across the region.¹¹¹

Non-housing tools: Connect SoCal 2024 offers following three policies under Equitable Engagement and Decision-Making, all of which are relevant for Bloomington and F-F:

1. Advance community-centered interventions, resources, and programming that serve the most disadvantaged communities and people in the region, like Priority Equity Communities, with strategies that can be implemented in the short-to-long term.
2. Promote racial equity that is grounded in the recognition of the past and current harms of systemic racism and one that advances restorative justice.
3. Increase equitable, inclusive, and meaningful representation and participation of people of color and disadvantaged communities in planning processes.¹¹²

Finally, the plan outlines 20 policies under Economy of which the following 11 are relevant for Bloomington and F-F:

1. Leverage and prioritize investments, particularly where there are mutual co-benefits to both freight and passenger/commuter rail.
2. Prioritize community and environmental justice concerns, together with economic needs, and support workforce development opportunities, particularly around deployment of zero-emission and clean technologies and their supporting infrastructure.
3. Explore and advance the transition toward zero-emission and clean technologies and other transformative technologies, where viable.
4. Advance comprehensive, systems-level planning of corridor/supply chain operational strategies that is integrated with road and rail infrastructure and inland port concepts.
5. Ensure continued, significant investment in a safe, secure, clean, and efficient transportation system—including both highways and rail—to support the intermodal movement of goods across the region.
6. Encourage partnerships and policies to broaden safe and efficient access to a range of mobility services that improve connections to jobs, education, and basic services.

¹¹¹ Southern California Association of Governments, *Connect SoCal 2024 – Chapter 3: “The Plan,”* adopted April 4 2024 (Los Angeles: SCAG, May 2024), 117, <https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-ch-03-our-plan-040424.pdf>.

¹¹² Southern California Association of Governments, *Connect SoCal 2024 – Chapter 3*.

7. Foster a positive business climate by promoting regional collaboration in workforce and economic development between cities, counties, educational institutions, and employers.
8. Encourage inclusive workforce development that promotes upward economic mobility.
9. Support entrepreneurial growth with a focus on underrepresented communities.
10. Foster a resilient workforce that is poised to effectively respond to changing economic conditions (e.g., market dynamics, technological advances, and climate change).
11. Inform and facilitate data-driven decision-making about the region's workforce.

3.2 Educational Dimension

The tools to mitigate educational disadvantage can be broadly classified into two categories. First, there are those that improve education at the community level. These often include workforce development and adult/youth learning programs. Second, there are tools that improve the quality of K–12 education; for example, there are those supporting STEM education and before- or after-school programs, and those funding meals for children.

3.2.1 Federal- and state-level tools

Major federal-level tools include the Head Start Program, the Summer Food Service Program, and the 21st Century Community Learning Centers Program (CCLC). The major state-level tools include the California State Preschool Program (CSPP), California Work Opportunities and Responsibility to Kids (CalWorks), and the After School Education and Safety Program. See Table 3.2 for the list, summary, and funding sources for these and other major programs.

Table 3.2 Select Federal- and State-Level Tools to Support Education

Program	Summary	Funding Source
Head Start	Head Start is a federal program that provides early learning for children from birth to 5 years and resources to families. The program is free to eligible families. Children who were in Head Start were 2.7% more likely to graduate from high school, 8.5% more likely to go to college, and 39% more likely to graduate from college than children who were not eligible for the program. Head Start reduced adult poverty by 23% and 31% specifically for women. ¹¹³	Federal
21 st Century Community Learning Centers (CCLC)	The CCLC Program is the result of the No Child Left Behind Act of 2001. This is a federally funded program that is administered by the state. The CCLC provides five-year grants to either create or support existing before- and after-school programs for K–12 students and to provide support for students to meet state academic standards. ¹¹⁴	Federal
Charter School Facilities Credit Enhancement Grant Program	This grant program reduces debt incurred by charter schools to operate by funding some or all of the debt service reserve. ¹¹⁵	Federal
Title 1 Part A	Title 1, Part A is federal funding for California schools to help students close achievement gaps in state academic standards. ¹¹⁶	Federal
Federal TRIO Programs (TRIO)	TRIO provides student services to students with disadvantaged backgrounds. There are eight TRIO programs that support low-income, first-generation college students, and programs for students with disabilities from middle school to postbaccalaureate. TRIO also provides training for TRIO directors and staff. ¹¹⁷	Federal

¹¹³ Administration for Children and Families, *Head Start Impact Study: Final Report, Executive Summary*, accessed December 8, 2025, <https://acf.gov/opre/report/head-start-impact-study-final-report-executive-summary>; Martha J. Bailey, Shuqiao Sun, *Evaluating the Head Start Program for Disadvantaged Children*, *National Bureau of Economic Research Digest* (April 2021), <https://www.nber.org/digest/202104/evaluating-head-start-program-disadvantaged-children>; Head Start, “Head Start Approach,” *HeadStart.gov*, accessed December 8, 2025, <https://www.headstart.gov/programs/article/head-start-approach>.

¹¹⁴ Heather Weiss, “Fifteen Years of Evaluation of 21st Century Community Learning Centers: A Driver for Program Quality and Capacity in the Field,” Expanded Learning and Afterschool Project, accessed December 12, 2025, <https://www.expandinglearning.org/expandingminds/article/fifteen-years-evaluation-21st-century-community-learning-centers-driver>.

¹¹⁵ State Treasurer’s Office, Charter School Facilities Credit Enhancement Grant Program, California Grants Portal, accessed July 29, 2025, <https://www.grants.ca.gov/grants/charter-school-facilities-credit-enhancement-grant-program/>.

¹¹⁶ California Department of Education, “Title I, Part A,” *Title I: Improving Academic Achievement*, accessed December 12, 2025, <https://www.cde.ca.gov/sp/sw/t1/>.

¹¹⁷ U.S. Department of Education, Federal TRIO Programs, accessed July 29, 2025, <https://www.ed.gov/about/ed-offices/opre/trio>.

Program	Summary	Funding Source
Summer Food Service Program	The Summer Food Service Program (SFSP) is federally funded through the U.S. Department of Agriculture (USDA) to provide meals to children 18 and under during the summer or times they are out of school for fifteen or more consecutive days.	Federal
Child and Adult Care Food Program (CACFP)	By providing meals and snacks to children enrolled in participating child care centers and day care homes, CACFP supports their K–12 education. ¹¹⁸	Federal
National School Lunch Program (NLSP)	NLSP is overseen by the United States Department of Agriculture (USDA) and, in California, is administered by the California Department of Education (CDE). It provides low-cost lunches to school children. ¹¹⁹	Federal
School Breakfast Program (SBP)	SBP is overseen by USDA and, in California, is administered by CDE. It provides low-cost breakfast to school children. ¹²⁰	Federal
California Universal Meals (UMP)	UMP builds on NLSP and SBP to provide free-of-cost breakfast and lunch to all California school students. ¹²¹	State
California State Preschool Program (CSPP)	CSPP provides education, meals for children, parental education, and health and social services for families. ¹²²	State
After School Education and Safety (ASES)	ASES funds existing after-school programs for students from K to 9th grade. ¹²³	State
Expanded Learning California Programs	Support socio-economically disadvantaged students, such as English learners, migrants, special education students, homeless students, and those in foster care. In the 2016–2017 school year, approximately 84% of students enrolled in these programs were socio-economically disadvantaged. Approximately 45% of public schools in California have expanded learning programs, with more	State

¹¹⁸ California Department of Education, “*Summer Food Service Program Information*,” *Summer Meal Programs – Nutrition*, accessed December 12, 2025, <https://www.cde.ca.gov/ls/nu/sf/sfspinfo.asp>.

¹¹⁹ California Department of Education, “*National School Lunch Program Overview*,” *School Nutrition – Nutrition Services Division*, accessed December 12, 2025, <https://www.cde.ca.gov/ls/nu/sn/nslp.asp>.

¹²⁰ California Department of Education, “*School Breakfast Program Overview*,” *School Nutrition – Nutrition Services Division*, accessed December 12, 2025, <https://www.cde.ca.gov/ls/nu/sn/sbp.asp>.

¹²¹ California Department of Education, “*California Universal Meals*,” *School Nutrition – Nutrition Services Division*, accessed December 12, 2025, <https://www.cde.ca.gov/ls/nu/sn/cauniversalmeals.asp>.

¹²² California Department of Education, “*Child Care and Development Programs*,” *Early Education – Specialized Programs*, accessed December 12, 2025, <https://www.cde.ca.gov/sp/cd/op/cdprograms.asp>.

¹²³ California Department of Education, “*After School Education and Safety Description*,” *Expanded Learning – After School Education and Safety*, accessed December 12, 2025, <https://www.cde.ca.gov/ls/ex/asesdescr.asp>.

Program	Summary	Funding Source
	than 40% of students who are eligible for the Free and Reduced-Price Meals program. ¹²⁴ ASES is the primary funding source for California Expanded Learning Programs. ASES funds support elementary and middle school students. ¹²⁵	
Summer Matters Campaign	The Summer Matters Campaign provides access and opportunities for students in California to prevent learning loss over the summer break. Students and teachers report significant and positive outcomes from students attending summer education programs, such as better relationships, attendance, student motivation, and increases in academic achievement. ¹²⁶	State
Charter School Facility Grant Program (SB740)	The Charter School Facility Grant Program is a state program that offers annual grants to charter schools with a high number of students who receive free or reduced-cost meals to fund on-going charter school facility costs. ¹²⁷	State
Public Charter Schools Grant Program (PCSGP)	PCSGP comprises four subgrants: Planning, Implementation, Replication, and Expansion. These subgrants are to establish, convert, expand, or replicate charter schools. ¹²⁸	State
California Work Opportunities and Responsibility to Kids (CalWORKs)	Low-income families may qualify to receive cash to pay for necessities, such as rent, food, and medical bills, as long as the family has at least one child in their home. ¹²⁹	State
College and Career Access Pathways Grant	Offered by CDE, this grant provides funding to local educational agencies (LEAs) to work with community colleges to provide high school students with college-level classes, particularly students who are underrepresented or may not be pursuing a college education. ¹³⁰	State

¹²⁴ California Department of Education, “After School Education and Safety Description,” 3.

¹²⁵ California Department of Education, “After School Education and Safety Description,” 4.

¹²⁶ California AfterSchool Network, State of the State: Expanded Learning in California 2018. Revised March 8, 2019, accessed June 24, 2025, https://www.afterschoolnetwork.org/sites/main/files/file-attachments/can_sots_expanded_learning_2018_web_revised_3.8.19.pdf, 8.

¹²⁷ California State Treasurer, *Charter School Facility Grant Program (Senate Bill 740 Program)*, accessed December 12, 2025, <https://www.treasurer.ca.gov/csfa/csfgp/index.asp>.

¹²⁸ California Department of Education, “2024–25 Start-Up Subgrant – Planning, Implementation, Replication, and Expansion, Public Charter Schools Grant Program,” accessed July 29, 2025, <https://www.grants.ca.gov/grants/2024-25-start-up-subgrant-planning-implementation-replication-and-expansion>.

¹²⁹ BenefitsCal, “CalWORKs,” *Help: Program Descriptions*, accessed December 12, 2025, <https://benefitscal.com/Help/program/calworks/HCPDE?lang=en>.

¹³⁰ California Department of Education, “College and Career Access Pathways (CCAP) Grant Program,” accessed March 1, 2025, <https://www.cde.ca.gov/fg/fo/r17/ccap24rfa.asp>.

Program	Summary	Funding Source
California Adult Education Program (CAEP)	CAEP funds adult education through school districts, community colleges, non-profits, public libraries, correctional facilities, etc. The CAEP provides support to adults who are immigrants, disabled, low-income, homeless, incarcerated, unemployed, or single parents. Education programs range from elementary to secondary education, English as a second language, citizenship programs, career technical education, family literacy, financial literacy, health literacy, and classes for older adults. ¹³¹	State
High Road Training Partnerships	The California Workforce Development Board and the California Labor and Workforce Development Agency have funding available through the 2025 Grant Program. This funding supports people in underserved communities to access High Road jobs. ¹³² High Road jobs are ones that provide wages to support a family, healthcare, pension, and paid sick leave. Additionally, these jobs have career growth opportunities, stable schedules, and healthy work environments, and workers have the right to join or form a union. ¹³³	State

The ASES and 21st CCLC supported around half a million California children in the 2016–2017 school year.¹³⁴ Furthermore, LEAs are required to reserve program and activity funds under the Every Student Succeeds Act (ESSA) for family engagement activities, homeless students, and students in local neglected and delinquent institutions.¹³⁵ Finally, a couple of state legislations also support education.

Proposition 47: Safe Neighborhoods and Schools Act Cohort 5 passed in November 2014. The purpose of Proposition 47 is to provide those in the criminal justice system for nonviolent crimes with mental health and substance use treatment.¹³⁶ The California Advanced Services Fund:

¹³¹ California Department of Education, "California Adult Education Funding," last modified March 2, 2025, <https://www.cde.ca.gov/sp/ae/po/cefadulted.asp>.

¹³² California Workforce Development Board, "High Road Training Partnerships: 2025 Grant Program," California Grants Portal, accessed June 17, 2025, <https://www.grants.ca.gov/grants/high-road-training-partnerships-2025-grant-program/>.

¹³³ California Workforce Development Board, The California High Road: A Road Map to Job Quality (August 2020), accessed July 14, 2025, https://cwdb.ca.gov/wp-content/uploads/sites/43/2020/08/OneSheet_Job-Quality_ACCESSIBLE.pdf.

¹³⁴ California AfterSchool Network, State of the State: Expanded Learning in California 2017–2018, (revised March 8, 2019), accessed June 23, 2025, https://www.afterschoolnetwork.org/sites/main/files/file-attachments/can_sots_expanded_learning_2018_web_revised_3.8.19.pdf, 3.

¹³⁵ California Department of Education, Title I, Part A Reservations, Title I: Improving Academic Achievement, accessed July 4, 2025, <https://www.cde.ca.gov/sp/sw/t1/reservations.asp>.

¹³⁶ Board of State and Community Corrections, "Proposition 47 Grant Program: Safe Neighborhoods and Schools Act Cohort 5," California Grants Portal, accessed June 17, 2025, <https://www.grants.ca.gov/grants/proposition-47-grant-program-safe-neighborhoods-and-schools-act-cohort-5/>.

Broadband Adoption Account grants provide publicly available or after-school programs with broadband and digital literacy access. The California Public Utilities Commission prioritizes communities that are low-income, seniors, or experiencing other socio-economic challenges.¹³⁷ The California State Library’s LTSA Community Impact grants support California libraries to fund projects that support the local needs of the communities they serve. These projects should center equity, diversity, and inclusion.¹³⁸

Proposition 28: Arts and Music in Schools Funding Guarantee and Accountability Act passed in 2022. This proposition supports existing arts education programs and provides more equitable access for students. California’s Local Control and Accountability Plan (LCAP) is a process for families to include arts education in schools for their children.¹³⁹ Programs in place through LCAP have an opportunity for expansion and additional funding through Proposition 28.¹⁴⁰

3.2.2 Regional-level tools

Regional-level tools: S.F. Bay Area

No tools.

Regional-level tools: SoCal Region

At the regional level, Connect SoCal 2024 has six broadband-related policies of which the following two are relevant:

1. Support ubiquitous regional broadband deployment and access to provide the necessary infrastructure and capability for Smart Cities strategies—to ensure the benefits of these strategies improve safety and are distributed equitably.
2. Encourage investments that provide access to digital activities that support educational, financial, and economic growth.¹⁴¹

¹³⁷ California Public Utilities Commission, “California Advanced Services Fund: Broadband Adoption Account – July 2025 Cycle,” California Grants Portal, accessed June 17, 2025, <https://www.grants.ca.gov/grants/california-advanced-services-fund-broadband-adoption-account-july-2025-cycle/>.

¹³⁸ California State Library, “2025–2026 LTSA Community Impact Grants,” California Grants Portal, accessed June 17, 2025, <https://www.grants.ca.gov/grants/2025-2026-lsta-community-impact-grants/>.

¹³⁹ California County Superintendents Arts Initiative, “Arts Education in the Local Control and Accountability Plan,” accessed June 18, 2025, https://cacountyarts.org/wp-content/uploads/CAArtsEd_LCAP23_V3.pdf.

¹⁴⁰ California County Superintendents Arts Initiative, “Funding Arts Education,” California County Superintendents Arts Initiative, accessed June 18, 2025, <https://cacountyarts.org/funding-arts-education/>.

¹⁴¹ Southern California Association of Governments, *Connect SoCal 2024 – Chapter 3*.

3.3 Environmental Dimension

The tools to mitigate environmental disadvantage can be broadly classified into three categories—those that mitigate groundwater pollution, air pollution, and exposure to lead.

3.3.1 Federal-level tools

Air pollution

The United States Environmental Protection Agency (EPA) is required by The Clean Air Act to regulate hazardous air pollutants (HAP) that come from major industrial facilities through two phases. In the first phase, the EPA sets standards for emissions, called maximum achievable control technology (MACT), based on the known minimal emissions of industry groups. Within 8 years of setting the standards for MACT, the EPA evaluates if the set standards have protected public health. In the second phase, the EPA determines if more standards are needed to further protect public health.

Smaller sources of emissions, such as gas stations and dry cleaners, are called area sources by the EPA. These area sources create significant emissions when combined, which has led to the EPA requiring standards and regulations that must be met.

The EPA reports that mobile source emissions have reduced by half or 1.5 million tons of HAPs a year, since 1990. In an effort to further reduce mobile source emissions, the EPA introduced the Tier 3 vehicle and fuel standards in 2014. This program is expected to reduce vehicle emissions from 10 to 30% by 2030.

The EPA also has Indoor Air Programs to reduce toxic air exposure indoors. Among others, these programs are intended to provide information on ventilation and strategies for pest control that are non-chemical in homes. In schools, the EPA provides action kits for schools to identify air pollution sources and how to mitigate or eliminate them.¹⁴²

Finally, under the Inflation Reduction Act, the Climate Pollution Reduction Grants (CPRG) program allocated close to \$5 billion in grants for states, local governments, tribes, and territories to enact plans that reduce GHG emissions.¹⁴³

Groundwater pollution

The National Pollutant Discharge Elimination System (NPDES) is a federal permit program that is part of the Clean Water Act that requires a permit for any wastewater discharge and has quality

¹⁴² U.S. Environmental Protection Agency, "Reducing Emissions of Hazardous Air Pollutants," last modified March 9, 2023, accessed April 3, 2025, <https://www.epa.gov/haps/reducing-emissions-hazardous-air-pollutants>.

¹⁴³ U.S. Environmental Protection Agency, Climate Pollution Reduction Grants, last modified March 1, 2024, accessed April 4, 2025, <https://www.epa.gov/inflation-reduction-act/climate-pollution-reduction-grants>.

and monitoring requirements. The program is managed by the Regional Board in the Bay Area. Additionally, the program regulates discharge into contaminated groundwater.¹⁴⁴

3.3.2 State-level tools

Air pollution

At the state level, Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006 required California to reduce GHG emissions to 1990 levels by the year 2020.¹⁴⁵ The state met its goal early in 2016. In 2016, Senate Bill 32 was enacted as a follow-up to AB 32. The state was now required to reduce GHG emissions to 40 percent below the 1990 levels by the year 2030.¹⁴⁶

Soon after AB32, in 2008, the Sustainable Communities and Climate Protection Act, Senate Bill 375 (SB 375), passed. This law aligns with the GHG reduction goals of AB 32. SB 375 requires that CARB sets regional transportation and housing goals for reducing GHG emissions.¹⁴⁷

Thereafter, California's Cap-and-Trade Program was established by CARB in 2013 to reduce GHG emissions by regulating sources of such emissions through set caps and allowing companies to purchase emissions allowances based on supply and demand.¹⁴⁸ California Climate Investments utilizes Cap-and-Trade generated funds to reduce GHG emissions, improve public health, bolster the economy, and support disadvantaged communities. CARB has Funding Guidelines to help agencies provide adequate support to their programs.¹⁴⁹

Next, in 2016, Assembly Bill 2722 created the Transformative Climate Communities (TCC) program. The TCC aims to address, at a community level, climate impacts, public health, and economic development in disadvantaged communities. TCC encourages community involvement and outreach to improve these areas of concern in disadvantaged communities.¹⁵⁰ It requires that a minimum of 51% of plans' area must be within census tracts that are in the top 5% of

¹⁴⁴ San Francisco Bay Regional Water Quality Control Board, "Programs," California Water Boards, accessed March 1, 2025, https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/.

¹⁴⁵ California Air Resources Board, *AB 32 Global Warming Solutions Act of 2006*, accessed April 4, 2025, <https://ww2.arb.ca.gov/resources/fact-sheets/ab-32-global-warming-solutions-act-2006>.

¹⁴⁶ UC Davis Center for Law, Energy & the Environment, *How California Is Working to Reduce Greenhouse Gas Emissions*, accessed April 4, 2025, <https://clear.ucdavis.edu/explainers/how-california-working-reduce-greenhouse-gas-emissions>.

¹⁴⁷ Institute for Local Government, "The Basics of SB 375," January 7, 2009, accessed April 4, 2025, <https://www.ca-ilg.org/post/basics-sb-375>.

¹⁴⁸ California Air Resources Board, *Cap-and-Trade Regulation Guidance: Chapter 1 – Overview of the Cap-and-Trade Program* (Sacramento, CA: CARB, n.d.), accessed April 4, 2025, 1, <https://ww2.arb.ca.gov/sites/default/files/cap-and-trade/guidance/chapter1.pdf>.

¹⁴⁹ California Air Resources Board, *California Climate Investments: 2018 Funding Guidelines*, accessed June 29, 2025, 1, <https://ww2.arb.ca.gov/sites/default/files/auction-proceeds/2018-funding-guidelines.pdf>.

¹⁵⁰ California Environmental Justice Alliance, *Transformative Climate Communities Report*, (January 2017), accessed June 23, 2025, 1, https://ceja.org/wp-content/uploads/2017/01/TCCReport.2016.FINAL_.2.pdf.

CalEnviroScreen 3.0 score. 49% or less must be within a SB 535-defined disadvantaged community or AB 1550-defined low-income community.¹⁵¹

Earlier in 2012, Senate Bill 535 introduced minimum funding requirements to disadvantaged communities and assigned CalEPA to identify disadvantaged communities.¹⁵² In 2016 Assembly Bill 1550 directed CalEPA to identify disadvantaged communities and required investment minimums: 25% to disadvantaged communities, 5% to low income households or low-income communities anywhere in the state, and 5% to low-income households or low-income communities that are out of, but within a half-mile of, disadvantaged communities.¹⁵³ In May 2022 AB 1550's designation for disadvantaged communities was updated to include four categories of disadvantaged communities: Census tracts with CalEnviroScreen 4.0 scores in the top quarter, census tracts that are in the top 5% of CalEnviroScreen 4.0 cumulative pollution burden scores but lack an overall score due to data gaps, census tracts that were previously identified as disadvantaged communities, and federally recognized Tribal lands.¹⁵⁴ Moreover, Assembly Bill 617 (AB 617), passed in 2017, requires state air districts to work with communities impacted by air pollution.

Furthermore, CARB approved the Advanced Clean Fleets regulation in August 2022, which requires fleets to adopt zero-emission vehicles for medium and heavy-duty vehicles by 2040. The Advanced Clean Cars II regulations were approved by CARB in November 2022 to reduce emissions from passenger vehicles by requiring all new passenger vehicles to be zero-emissions by 2035. In April 2023 CARB approved the In-Use Locomotive regulation, to reduce emissions from diesel locomotives and to increase zero-emission technology. In May 2023, CARB adopted the Hexavalent Chromium Airborne Toxic Control Measure, a strict regulation placed on the chrome plating industry to eventually eliminate toxic hexavalent chromium emissions in California.¹⁵⁵

Finally, CARB's statewide strategies to improve air quality issues include State Strategy for the State Implementation Plan, California's 2022 Climate Change Scoping Plan, the California Sustainable Freight Action Plan, the short-Lived Climate Pollutants Reduction Strategy, and the 2020 Mobile Source Strategy. In addition to these plans, CARB has also adopted incentive

¹⁵¹ California Environmental Justice Alliance, *Achieving Environmental Justice in California: Executive Summary* (March 2018), accessed July 3, 2025, 3, <https://ceja.org/wp-content/uploads/2018/03/CESReport.ExecutiveSummary.pdf>.

¹⁵² Office of Environmental Health Hazard Assessment, "SB 535 Disadvantaged Communities," CalEnviroScreen, accessed July 1, 2025, <https://oehha.ca.gov/calenviroscreen/sb535>.

¹⁵³ California Air Resources Board, *California Climate Investments: 2018 Funding Guidelines*.

¹⁵⁴ Office of Environmental Health Hazard Assessment, "SB 535 Disadvantaged Communities."

¹⁵⁵ Bay Area Air Quality Management District, *Path to Clean Air Community Emissions Reduction Plan*, April 2024, 143–44, https://www.baaqmd.gov/~/media/files/ab617-community-health/richmond/2024/042024-final-ptca-plan-files/ptca-plan_final_april-2024-pdf.

programs and is working on other plans, such as The Community Air Protection Blueprint, to reduce air pollution in the most impacted communities in California.¹⁵⁶

Groundwater pollution

In California, groundwater is one of the sources of clean water in nine out of ten public water systems. Therefore, focusing on water pollution, the State Water Resources Control Board (State Water Board) created the Groundwater Ambient Monitoring and Assessment (GAMA) Program in 2000. GAMA was then expanded by Assembly Bill 599: Groundwater Quality Monitoring Act of 2001. This bill required better statewide groundwater monitoring and better public education on groundwater quality.¹⁵⁷

Lead exposure

At the state level, California declared that lead was the greatest environmental health risk to children and enacted the Childhood Lead Poisoning Prevention Acts of 1986, 1989, and 1991. In 1986, the Childhood Lead Poisoning Prevention Program (CLPPP) was created.¹⁵⁸ The CLPPP provides preventative education and public outreach, trains workers to identify and abate lead in buildings, and provides lead testing on children through case management and home visits.¹⁵⁹

Furthermore, the Residential Lead-Based Paint Hazard Reduction Act of 1992, also known as Title X, requires that homes built before 1978 must disclose any known lead exposure to buyers and renters. Title X requires that buyers and renters are given a copy of the pamphlet “Protect Your Family from Lead in Your Home” and buyers are given 10 days to conduct a lead risk assessment.¹⁶⁰

California Civil Code Section 1941.1 and several California Health and Safety Code Sections exist to enforce that buildings with lead hazards are in violation of State Housing Law.¹⁶¹

¹⁵⁶ Bay Area Air Quality Management District, Path to Clean Air Community Emissions Reduction Plan.

¹⁵⁷ California State Water Resources Control Board, *Groundwater Ambient Monitoring and Assessment (GAMA) Program*, accessed March 1, 2025, https://www.waterboards.ca.gov/water_issues/programs/gama/.

¹⁵⁸ California Department of Public Health, "Lead Laws and Regulations," accessed March 1, 2025, <https://www.cdph.ca.gov/Programs/CCDCPHP/DEODC/CLPPB/Pages/leg.aspx#>.

¹⁵⁹ California Department of Public Health, "Childhood Lead Poisoning Prevention Program Fact Sheet," accessed March 1, 2025, <https://www.cdph.ca.gov/Programs/CCDCPHP/DEODC/CLPPB/CDPH%20Document%20Library/CLPPBFactSheet.pdf>.

¹⁶⁰ U.S. Department of Housing and Urban Development, *Lead-Based Paint Disclosure Rule Fact Sheet*, accessed March 1, 2025, https://www.hud.gov/sites/dfiles/HH/documents/Lead_Based_Paint_Disclosure_Rule_FactSheet.pdf.

¹⁶¹ California Department of Public Health, "Lead Laws and Regulations," accessed March 1, 2025, <https://www.cdph.ca.gov/Programs/CCDCPHP/DEODC/CLPPB/Pages/leg.aspx#>.

3.3.3 Regional-level tools

Regional-level tools: S.F. Bay Area

Air and ground pollution: At the regional level, ABAG/MTC's Plan Bay Area 2050 identifies nine broad environmental strategies of which the following five are relevant to WO and NR to address both air and ground pollution: EN1: Protect communities from sea level rise, with an emphasis on supporting vulnerable populations; EN2: Provide assistance and incentives to retrofit buildings to meet higher standards for seismic, wildfire, water, and energy. Subsidies to be provided on a means-based basis; EN3: Upgrade all commercial and public buildings to be carbon neutral through electrification and resilient power system upgrades; EN4: Encourage commercial density in PDAs and TRAs to bring more jobs to areas with public transit; and EN6: Invest in parks, trails, and recreational facilities to promote inclusivity and access to people of diverse backgrounds.¹⁶²

Regional-level tools: SoCal Region

Air pollution: At the regional level, the Southern California Council of Governments' (SCAG) regional plan, called Connect SoCal 2024, identifies three air-quality-related policies, all of which are relevant for Bloomington and F-F:

1. Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts.
2. Support investments that reduce hazardous air pollutants and GHG emissions.
3. Reduce the exposure and impacts of emissions and pollutants and promote local and regional efforts that improve air quality for vulnerable populations, including but not limited to Priority Equity Communities and the AB 617 Communities.

Furthermore, the following four clean transportation-related policies aimed at improving air quality are also all relevant to Bloomington and F-F.

1. Accelerate the deployment of a zero-emission transportation system and use near-zero-emission technology to offer short-term benefits where zero-emissions solutions are not yet feasible or commercially viable.
2. Promote equitable use of and access to clean transportation technologies so that all may benefit from them.
3. Consider the full environmental life cycle of clean transportation technologies, including upstream production and end-of-life as an important part of meeting SCAG's objectives in economic development and recovery, resilience planning, and achievement of equity.

¹⁶² Metropolitan Transportation Commission and Association of Bay Area Governments, *Plan Bay Area 2050* (October 2021), https://planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_October_2021.pdf, x.

4. Maintain a technology-neutral approach in the study of, advancement of, and investment in clean transportation technology.

3.4 Transportation Dimension

3.4.1 Federal-level tools

At the federal level, the Infrastructure Investment and Jobs Act (IIJA) created the Safe Streets for All grant of \$5 billion to be appropriated between 2022–2026. The program funds regional, local, and Tribal groups to increase safety on roadways.¹⁶³

Moreover, since 2015, the Federal Transit Administration (FTA) has awarded over \$90 million Transit-Oriented Development (TOD) programs across the United States. The FTA TOD Planning Program has a current fund of \$68.9 million dollars under IIJA 2022–2026.¹⁶⁴

Finally, the Congestion Mitigation and Air Quality Improvement (CMAQ) Program provides funding for transportation demand management (TDM) programs across the nation through state departments of transportation (DOTs) and MPOs. The Moving Ahead for Progress in the 21st Century Act (MAP-21) modified CMAQ to include the following as eligible: telecommuting, rideshare, carshare, alternative working hours, and project pricing.¹⁶⁵

3.4.2 State-level tools

At the state level, several initiatives seek to mitigate transportation disadvantage through investments and policies.

Among the first investments-focused programs, beginning in the early 1970s, the Transportation Development Act (TDA) allows counties to have a quarter-cent sales tax for transportation-related planning and projects such as bus and rail, paratransit services, and pedestrian and bicycle facilities.¹⁶⁶

Assembly Bill 32 is the California Global Warming Solutions Act of 2006. It declares that the State Air Resources Board is responsible for monitoring greenhouse gas emissions. GHG levels must be

¹⁶³ U.S. Department of Transportation, “Safe Streets and Roads for All (SS4A) Grant Program,” accessed April 17, 2025, <https://www.transportation.gov/grants/SS4A>.

¹⁶⁴ Federal Transit Administration. *Transit-Oriented Development*. Accessed April 17, 2025, <https://www.transit.dot.gov/TOD>.

¹⁶⁵ Southern California Association of Governments, Transportation Demand Management (TDM) Strategic Plan and Final Report (May 2024), accessed July 8, 2025, https://scag.ca.gov/sites/default/files/2024-05/tdm-strategic-plan_scag.pdf, Appendix C, 3.

¹⁶⁶ Metropolitan Transportation Commission, “Transportation Development Act (TDA) & State Transit Assistance (STA),” accessed April 16, 2025, <https://mtc.ca.gov/funding/regional-funding/transportation-development-act-tda-state-transit-assistance-sta>.

reduced to 40% below 1990 levels by 2030.¹⁶⁷ AB 398 (2017) builds on its previous 2006 version, providing priorities for future Cap-and-Trade program allocations, including low- and zero-carbon transportation alternatives.¹⁶⁸

Assembly Bill 1358 is the California Complete Streets Act. It passed in 2008. The Office of Planning and Research is required to amend the General Plan Guidelines to support cities and counties to have multimodal transportation policies in the circulation elements in their general plans from January 2011 onward.¹⁶⁹

In 2013, Senate Bill 99 led to the creation of the Active Transportation Program with an initial \$123 million a year available for bicycle and pedestrian infrastructure, programs, and projects. In 2017 Senate Bill 1 was passed for an additional \$100 million a year for Road Maintenance and Rehabilitation Account to the ATP.¹⁷⁰

Moreover, CARB's Clean Mobility Options for Disadvantaged Communities program has \$20 million in state funding for zero-emission bikeshare, carshare, rideshare, and public transit projects in disadvantaged communities.¹⁷¹

Furthermore, the AHSC program provides grant funding to eligible cities, counties, transit agencies, school districts, developers, and tribes for affordable housing development projects, sustainable transportation infrastructure, and public transit amenities for the purposes of reducing GHG emissions and increasing public health, particularly in disadvantaged communities.¹⁷²

Safe Routes to School Program (SRS) aims to reduce congestion from students being picked up or dropped off by cars. Schools, school districts, transportation agencies, and other stakeholders

¹⁶⁷ California Legislature, Assembly Bill 398 (Chapter 135, Statutes of 2017; E. Garcia), Chaptered July 25, 2017, accessed July 2, 2025, https://calmatters.digitaldemocracy.org/bills/ca_201720180ab398.

¹⁶⁸ California Air Resources Board, California Climate Investments: 2018 Funding Guidelines, accessed June 29, 2025, <https://ww2.arb.ca.gov/sites/default/files/auction-proceeds/2018-funding-guidelines.pdf>, 1.

¹⁶⁹ Governor's Office of Planning and Research, Update to the General Plan Guidelines: Complete Streets and the Circulation Element (December 2010), accessed July 29, 2025, https://lci.ca.gov/docs/Update_GP_Guidelines_Complete_Streets.pdf, 1.

¹⁷⁰ California Transportation Commission, *Active Transportation Program*, accessed April 17, 2025, <https://catc.ca.gov/programs/active-transportation-program>.

¹⁷¹ California Bicycle Coalition, *Funding Sources*, accessed April 17, 2025, https://www.calbike.org/resources/funding_sources/.

¹⁷² California Grants Portal. *Affordable Housing & Sustainable Communities Round 8*. Accessed April 17, 2025, <https://www.grants.ca.gov/grants/affordable-housing-sustainable-communities-round-8/>.

work together to promote alternative modes of transportation for students. These alternatives include walking groups, bicycle groups, carpools, taking transit, and taking a school bus.¹⁷³

The California HCD Infill Infrastructure Grant (IIG) Program provides funding for infill in new construction or for the rehabilitation of high density affordable and mixed-income housing.¹⁷⁴

The California HCD TOD Housing Program provides low-interest loans for rental housing development near public transit and mortgage assistance for homebuyers.¹⁷⁵

On the policy side, the state's Density Bonus Law was enacted in 1979, which incentivizes developers to build affordable housing by allowing them to increase density beyond the zoning limits.¹⁷⁶

Assembly Bill 2864 incentivizes housing development near job-rich areas to encourage jobs and housing balance in the state.¹⁷⁷

Assembly Bill 2011, the Affordable Housing and High Road Jobs Act of 2022 enables the state to meet housing goals by allowing for a more streamlined process for affordable housing development and mixed-income housing along commercial corridors.¹⁷⁸ Senate Bill 79: Transit-Oriented Development (TOD) and Upzoning, aims to allow more multi-family homes to be built near transit and up-zoning areas that were previously only zoned for single-family homes. SB79 will streamline the process for TODs.¹⁷⁹ Finally, Senate Bill 358 would support sustainable growth and reduce climate impacts in California by incentivizing TODs through the reduction of impact fees for developing housing near transit.¹⁸⁰

¹⁷³ Southern California Association of Governments, Transportation Demand Management (TDM) Strategic Plan and Final Report (May 2024), accessed July 8, 2025, https://scag.ca.gov/sites/default/files/2024-05/tdm-strategic-plan_scag.pdf, 13.

¹⁷⁴ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, March 2017, 5–20, <https://lus.sbcounty.gov/wp-content/uploads/sites/48/SpecificPlans/ValleyCorridorSPMarch2017web.pdf>.

¹⁷⁵ Ibid.

¹⁷⁶ Southern California Association of Governments, *Density Bonus Law: What Are Incentives, Concessions, and Waivers?* accessed April 25, 2025, https://scag.ca.gov/sites/default/files/old/file-attachments/density_bonus_law_-_what_are_incentives_concessions_and_waivers.pdf

¹⁷⁷ Southern California Association of Governments, The New Economy and Jobs/Housing Balance, February 2001, accessed April 25, 2025, <https://scag.ca.gov/sites/default/files/old/file-attachments/neweconomyjobshousingbalance.pdf>, 5.

¹⁷⁸ California YIMBY, *AB 2011: Affordable Housing and High Road Jobs Act Factsheet*, August 2022, <https://cayimby.org/wp-content/uploads/2022/10/AB-2011-Affordable-Housing-and-High-Road-Jobs-Act-Factsheet-August-2022.pdf>.

¹⁷⁹ California YIMBY, *SB 79 (Wiener) – Abundant and Affordable Homes Near Transit: Fact Sheet*, March 24, 2025. <https://cayimby.org/wp-content/uploads/2025/03/3.24.25-SB-79-Wiener-Fact-Sheet.pdf>.

¹⁸⁰ Senator Josh Becker, "Senator Josh Becker Announces SB 358 to Lower Housing Costs and Boost Transit-Oriented Development," *Senator Josh Becker*, April 9, 2025, <https://sd13.senate.ca.gov/news/press-release/april-9-2025/senator-josh-becker-announces-sb-358-to-lower-housing-costs-and>.

Finally, the California Department of Housing and Community Development determines the RHNA by calculating housing needs in each region and requires each region's council of governments (COG) to develop their RHNA plans. Local governments are then required to include the RHNA targets in their housing elements.¹⁸¹

Among the recently tabled bills, Assembly Bill 1244, VMT Mitigation Fund for Affordable Housing, would allow for the collection of funds from projects that increase VMT to fund affordable housing near transit.¹⁸²

The following California Government Codes pertain to jobs and housing balance efforts in California. Section 65890.1 encourages land use to have jobs and housing balance, reduced traffic congestion, local and state agencies collaboration on jobs and housing balance, and to create more housing.¹⁸³ Section 65890.3 declares that the Department of Housing and Community Development will provide a guidebook for local and state governments, as well as private developers, to meet the needs of employment growth.¹⁸⁴ Section 65890.5 provides the required contents of the guidebook referenced in Section 65890.3: methodologies for measuring, analyzing, and encouraging jobs and housing balance, incentive options for local, regional, and state governments to offer the private sector, methodologies for VMT analysis, and case studies of other cities and counties job and housing balanced efforts.¹⁸⁵

3.4.3 Regional-level tools

Regional-level tools: SF Bay Area

The ABAG/MTC's Plan Bay Area 2050 identifies twelve broad transportation strategies of which six are relevant to WO and NR as they aim to improve pedestrian and bike safety and increase transit accessibility:

T1: The restoration and maintenance of existing transit infrastructure and restoring transit hours that were reduced due to the pandemic;

¹⁸¹ California Department of Housing and Community Development, *Regional Housing Needs Allocation (RHNA)*, accessed April 17, 2025, <https://www.hcd.ca.gov/planning-and-community-development/regional-housing-needs-allocation>.

¹⁸² California Housing Partnership. *AB 1244 (Wicks) – VMT Mitigation Fund for Affordable Housing: Fact Sheet*. March 14, 2025. Accessed April 18, 2025, <https://chpc.net/wp-content/uploads/2025/03/AB-1244-Fact-Sheet94.pdf>.

¹⁸³ California Government Code § 65890.1, accessed April 25, 2025, <https://law.justia.com/codes/california/code-gov/title-7/division-1/chapter-4/article-2-9/section-65890-1/>.

¹⁸⁴ California Government Code § 65890.3, accessed April 25, 2025, <https://law.justia.com/codes/california/code-gov/title-7/division-1/chapter-4/article-2-9/section-65890-3/>.

¹⁸⁵ California Government Code § 65890.5, accessed April 25, 2025, <https://law.justia.com/codes/california/code-gov/title-7/division-1/chapter-4/article-2-9/section-65890-5/>.

T2: Direct funding to community-identified and lead transportation needs in Equity Priority Communities;

T7: Fund motorist aid, 511, arterials, and local streets;

T8: Invest in a Complete Streets network to encourage walking, biking, micro-mobility, car free streets, and increase bike lanes and multi-use paths;

T9: Promote regional support of Vision Zero policy by reducing speeds on local roads and freeways through street design and speed enforcement; and

T10: Improve the frequency and quality of bus and light rail transit, especially in lower-income communities.¹⁸⁶

Additionally, three of the environmental strategies to reduce climate emissions are relevant to transportation: EN7: Expand on the Bay Area Commuter Benefits Program, where participating employers incentivize employees to use alternative modes of transportation to driving; EN8: Invest in fuel-efficient and electric vehicles and provide more subsidies and chargers; EN9: Expand transportation demand management programs that encourage vanpools, carshares, bikeshares, and increasing parking fees for single occupancy drivers.¹⁸⁷

Regional-level tools: SoCal Region

In 2019, the Southern California Association of Governments (SCAG) reported that car ownership had increased due to greater accessibility and affordability of cars, gas prices, and an oversupply of parking. The cost of housing was also a contributing factor: as people move further away from their jobs, car dependency increases.¹⁸⁸ SCAG suggests private carshare options could provide a solution to reducing car ownership.¹⁸⁹ For example, Los Angeles has a program called Blue LA that provides electric vehicle carshare options in low-income areas in the city.¹⁹⁰ SCAG is also interested in exploring is Mobility-as-a-Service (MaaS) or Mobility on Demand (MOD). On one

¹⁸⁶ Metropolitan Transportation Commission and Association of Bay Area Governments, *Plan Bay Area 2050* (October 2021), https://planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_October_2021.pdf, ix.

¹⁸⁷ Metropolitan Transportation Commission and Association of Bay Area Governments, *Plan Bay Area 2050: Regional Growth Framework Revisions*, accessed October 9, 2024, https://planbayarea.org/sites/default/files/5a_PBA_2050_-_Regional_Growth_Framework_Revisions_rev2.pdf, x.

¹⁸⁸ Southern California Association of Governments, "Transportation Demand Management (TDM) Strategic Plan and Final Report (May 2024)," accessed July 8, 2025, Appendix D, 28, https://scag.ca.gov/sites/default/files/2024-05/tdm-strategic-plan_scag.pdf.

¹⁸⁹ Southern California Association of Governments, "Transportation Demand Management (TDM) Strategic Plan."

¹⁹⁰ Southern California Association of Governments, "Transportation Demand Management (TDM) Strategic Plan."

platform a user would be able to plan, obtain trip data, make decisions, and pay for multiple modes of transportation for a trip.¹⁹¹

Finally, Connect SoCal 2024, offers 31 policies in its “Mobility” section. Of which several in the “Complete Streets,” “Transit and Multimodal Integration,” and “Transportation Demand Management” sub-sections are relevant to Bloomington and F-F. They are as follows:

Complete Streets (all four policies)

1. Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, and taking transit).
2. Ensure the implementation of Complete Streets that are sensitive to urban, suburban or rural contexts and improve transportation safety for all, but especially for vulnerable road users (e.g., people, especially older adults and children, walking, and biking).
3. Facilitate the implementation of Complete Streets and curb space management strategies that accommodate and optimize new technologies, micromobility devices, and first/last mile connections to transit and last-mile delivery.
4. Support implementation of Complete Streets improvements in Priority Equity Communities, particularly with respect to Transportation Equity Zones, as a way to enhance mobility, safety, and access to opportunities.¹⁹²

Transit and Multimodal Integration (three out of five policies)

1. Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility, and safety.
2. Support connections across the public, private, and nonprofit sectors to develop transportation projects and programs that result in improved connectivity.

¹⁹¹ Southern California Association of Governments, “Transportation Demand Management (TDM) Strategic Plan.”

¹⁹² Southern California Association of Governments, *Connect SoCal 2024 – Chapter 3*.

3. Support the implementation of transportation projects in Priority Equity Communities, particularly with respect to Transportation Equity Zones, as a way to enhance mobility, safety, and access to opportunities.¹⁹³

Transportation Demand Management (two out of three policies)

1. Encourage the development of transportation projects that provide convenient, cost-effective, and safe alternatives to single-occupancy vehicle travel (e.g., trips made by foot, on bikes, and via transit).
2. Encourage jurisdictions and TDM practitioners to develop and expand local plans and policies to promote alternatives to single occupancy vehicle travel for residents, workers, and visitors.¹⁹⁴

The above policies are in addition to the Policies under the “Priority Development Areas” section noted under the socio-economic dimension (see Section 3.1).

The next four chapters—one chapter per case study—provide an in-depth discussion of the kinds of disadvantages faced by the case study DACs, and the impacts of these disadvantages on the DACs. Each chapter also identifies the community- and jurisdiction-level (city-level in the case of WO and county-level for the remaining three DACs because they are located in unincorporated county areas) tools being used or those that are available to mitigate the disadvantages. It compares the availability of these tools and the federal-, state-, and regional-level tools noted in Chapter 3 with the literature-suggested tools and provides a qualitative assessment of the effectiveness of the tools.

¹⁹³ Southern California Association of Governments, *Connect SoCal 2024 – Chapter 3*.

¹⁹⁴ Southern California Association of Governments, *Connect SoCal 2024 – Chapter 3*.

4. West Oakland Case Study

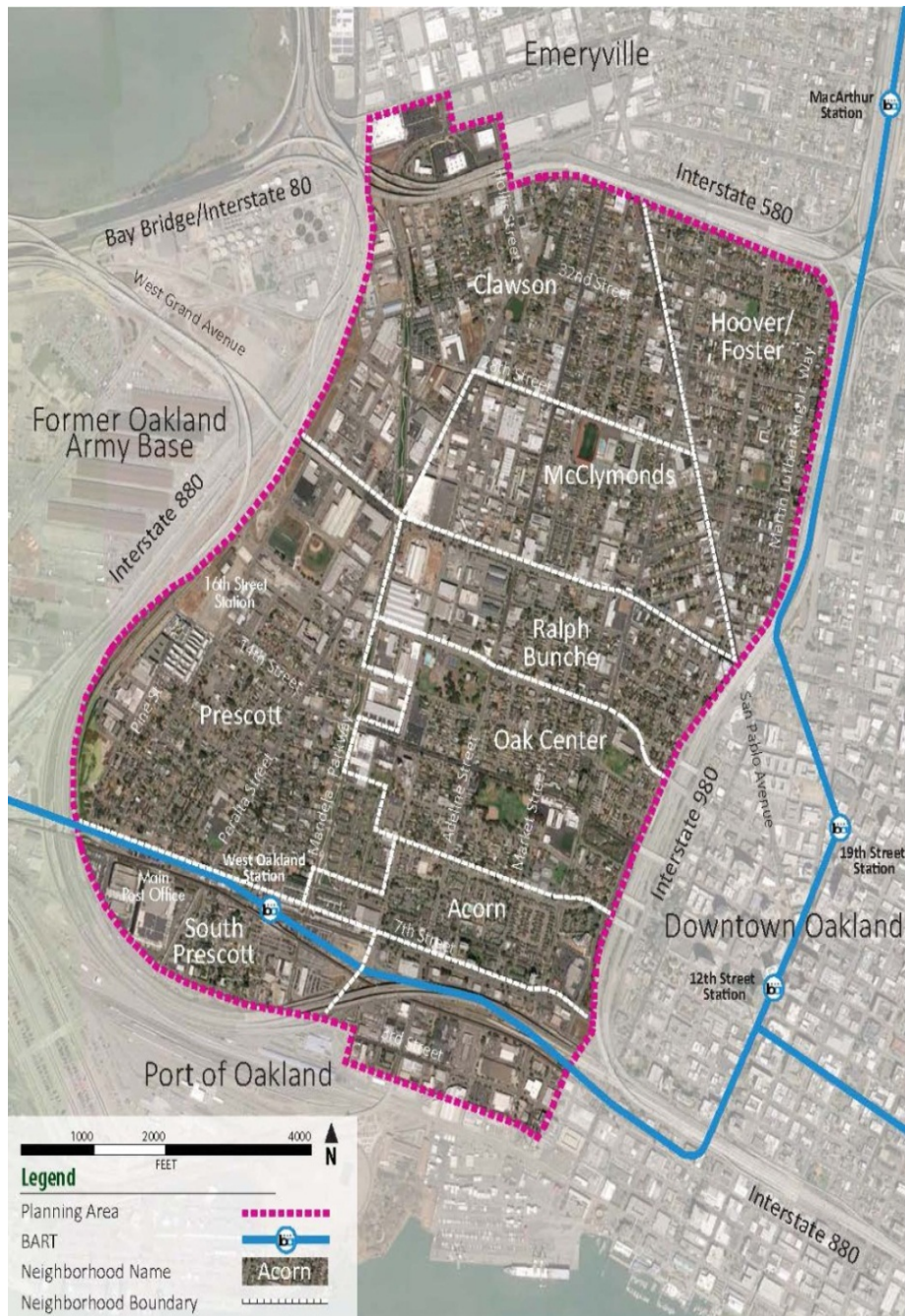
4.1 Overview

Oakland, California is in Alameda County, in the East Bay region of the San Francisco Bay Area. WO is the western part of Oakland (see Figures 4.1 and 4.2 for location maps). According to the 2014 WOSP, there are approximately 25,000 people in WO with employment opportunities for approximately 15,000 employees. Per the 2020 U.S. Census, WO's population is 29% white (not Hispanic/Latino), 33.5% Black, 1% American Indian, 11.4% Asian, 1% Pacific Islander, 13.3% other race, and 10.7% two or more races; 21.1% of the population is Hispanic/Latino.¹⁹⁵ WO has been a Black community historically. However, the Black population has been declining. The median income in WO is 60% of the median income of the City of Oakland. The majority of residents in WO are renters (78% versus 58% city-wide), they have fewer cars, and they have more children in their households compared to the City of Oakland. WO is largely residential. Approximately 60% of the land use is residential, 23% is industrial or commercial, and 17% is used for government or utilities.¹⁹⁶

¹⁹⁵ U.S. Census Bureau. *2020 Decennial Census Data: West Oakland, California*. Accessed through Esri Business Analyst, Esri, Redlands, CA, <https://bao.arcgis.com/>.

¹⁹⁶ City of Oakland, "West Oakland Specific Plan," (Oakland, CA: City of Oakland, 2014), 1-1-1-7, <https://oaklandca.s3.us-west-1.amazonaws.com/oakca1/groups/ceda/documents/report/oak049121.pdf>.

Figure 4.1 Map of West Oakland, California¹⁹⁷



¹⁹⁷ Map of West Oakland, City of Oakland, accessed November 4, 2025, <https://www.oaklandca.gov/files/assets/city/v/1/planning-amp-building/images/sp/neighborhood-plans/wosp-map.jpg>.

Figure 4.2 Map of Oakland, California within San Francisco Bay Area¹⁹⁸



¹⁹⁸ Bay Area Map, PNG image, Wikimedia Commons, accessed December 14, 2025, https://upload.wikimedia.org/wikipedia/commons/b/bc/Bayarea_map.png.

4.2 Summary of Disadvantages

As per Mathur and Ferrell (2024), WO had measurable disadvantages across all five dimensions noted in Chapter 1.1, with especially strong disadvantages under the Demographic, Economic, and Educational dimensions.¹⁹⁹

4.3 Socio-economic Dimension (sub-dimensions DE1 and DE2 of the demographic dimension and EC1 and EC2 of the economic dimension)

4.3.1 Demographics (sub-dimensions DE1 and DE2)

Summary of disadvantages

About half the PDA is distressed on DE1 (concentration of racial minorities) and the entire PDA is distressed on DE2 (concentration of single-parent households).

Indeed, WO is considered racially segregated due to the overrepresentation of people of color in comparison to the rest of Oakland by over 50%²⁰⁰ and the people of color are much less likely to live in areas of Oakland where the majority of the population is white.²⁰¹ Furthermore, WO has experienced a loss of Black residents due to disinvestment and displacement between 2000–2015.²⁰² The 2010 era of predatory lending and subsequent foreclosures played a major role in this loss of the Black population and a significant reduction in Black homeownership in WO.²⁰³ Furthermore, the extremely low-income (ELI) Latino/Hispanic communities are highly represented in WO.²⁰⁴ Approximately 21.1% of the population in WO is Hispanic or Latino.²⁰⁵ Finally, 20% of Oakland households are headed by a single parent and WO is likely to meet or exceed this proportion.²⁰⁶

Impacts

WO presents many of the negative impacts of demographic disadvantage (see Chapter 2.1 for the discussion of such disadvantages). It has the highest rate of poverty (11 out of 14 census

¹⁹⁹ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

²⁰⁰ Urban Displacement, "Rising Housing Costs and Re-Segregation in Alameda County," (2021), 12, https://www.urbandisplacement.org/wp-content/uploads/2021/08/alameda_final.pdf.

²⁰¹ "Racial Equity Impact Analysis for Oakland's Housing Element Update," *City of Oakland*, January 6, 2023, 19, https://cao-94612.s3.us-west-2.amazonaws.com/documents/Housing-Element-REIA-1.6.23_Final.pdf.

²⁰² Urban Displacement, "Rising Housing Costs and Re-Segregation in Alameda County," 1–3.

²⁰³ "Racial Equity Impact Analysis for Oakland's Housing Element Update," 31.

²⁰⁴ "Racial Equity Impact Analysis for Oakland's Housing Element Update," 24.

²⁰⁵ U.S. Census Bureau. *2020 Decennial Census Data: West Oakland, California*. Accessed through Esri Business Analyst, Esri, Redlands, CA, <https://bao.arcgis.com/>.

²⁰⁶ Bay Area Census, "Households: Oakland," <https://census.bayareametro.gov/households?location=oakland>.

tracts),²⁰⁷ the lowest life expectancy (67 years),²⁰⁸ and among the lowest public safety, community opportunities, economic opportunities, and educational opportunities, and the highest foreclosure and eviction rates in Oakland. Finally, the City of Oakland documents echo two of the negative impacts of single-parent households—financial challenges and lack of support raising children²⁰⁹—which are likely to disproportionately impact single-parent households.

4.3.2 Economics (sub-dimensions EC1 and EC2)

Summary of disadvantages

Mathur and Ferrell (2024) found that EC1 (lack of affordable housing) was not a concern in WO.²¹⁰ However, EC2 (concentrated poverty), placed WO in the bottom quartile, suggesting the neighborhood has a high concentration of poverty. The city documents reinforce the finding regarding the concentration of poverty—the median income for WO residents was \$39,303 in 2017, compared to \$58,807 for Oakland as a whole.²¹¹

Both the indicators combined suggest that WO continues to provide a valuable housing resource to lower-income households. Notably, this is in spite of some gentrification, where higher-wage households are finding relatively inexpensive and job-accessible housing in this neighborhood, amid declining minority homeownership rates.

The city policies and the foreclosure crisis fueled gentrification and homeownership decline. Specifically, in March 2014, Mayor Jean Quan announced a “10K Project”—a term previously coined by former mayor Jerry Brown to attract more people into the city, which was considered an effort that caused gentrification in Oakland in the early 2000s. Mayor Quan’s project was to create 10,000 new units of housing to attract new residents. Only 25% of Mayor Quan 10K Project was for affordable units, leaving existing Oakland residents with inadequate housing and a new wave of gentrification.²¹² Furthermore, WO and other distressed areas of Oakland were hit the hardest by foreclosures. Of the foreclosed homes in Oakland, 42% were purchased by corporate

²⁰⁷ Haley et al., "Neighborhood-Level Determinants of Life Expectancy in Oakland, CA," 14.

²⁰⁸ Haley et al., "Neighborhood-Level Determinants of Life Expectancy in Oakland, CA," 20.

²⁰⁹ City of Oakland, "Environmental Justice Element: Public Review Draft," March 21, 2023, 6-2, https://cao-94612.s3.amazonaws.com/documents/EJ-Element_032123-public-review-draft_reduced.pdf; City of Oakland, "West Oakland Specific Plan, Final Plan," (Oakland, CA: City of Oakland, 2014), 10-26–10-27, <https://oaklandca.s3.us-west-1.amazonaws.com/oakca1/groups/ceda/documents/report/oak049130.pdf>.

²¹⁰ Mathur and Ferrell, Are California’s Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

²¹¹ Environmental Justice Task Force, Oakland Initiative Report (California Environmental Protection Agency, 2018), 6, https://calepa.ca.gov/wp-content/uploads/sites/6/2018/03/OAKEJ_initiative_FINALweb.pdf.

²¹² Maria Poblet, "Struggle for the Flatlands," Convergence (April 22, 2014), accessed December 12, 2025, <https://convergencemag.com/articles/struggle-for-the-flatlands/>.

investors, further leading to pushing out Oakland residents and preventing homeownership.²¹³ Finally, WO does not currently have a full-service grocery store.²¹⁴

A local CBO staff member echoes the above findings, noting that there is no neighborhood-serving retail in WO, nor are there opportunities for entrepreneurship. WO is a historically redlined community that accounted for 5% of the city's population and 20% of low-income housing as of 2012. It also has a large portion of the "unhoused" population, so there is a concentration of poverty. Lamenting further, the staff member notes that, recently, a credit union left, and banks left in the 80s and 90s. Corner stores usually sell only beer and cigarettes. They could also be incentivized to sell fresh produce, however. The staff member further opined that instead of incentivizing an extensive \$100 million project that would destabilize the neighborhood, it is better to give smaller amounts of financial assistance to community members to start new businesses.²¹⁵

4.3.3 Local tools to mitigate socio-economic disadvantage

Housing tools

Many of the suggested solutions to address socio-economic disadvantage coming from the city of Oakland are to make housing-related investments in places like WO. Specifically, the WOSP, adopted in 2014, notes collecting impact fees to contribute towards the development of affordable housing,²¹⁶ a policy supported by the Oakland Community Investment Alliance (OCIA) which advocates for impact fees from developers to fund affordable housing, transit, and other capital improvements.²¹⁷

The Oakland Environmental Justice Element of the city's General Plan recognizes the need for more childcare facilities, especially free and subsidized options, and aims to increase the number of childcare locations. Oakland aims to incentivize more childcare locations in the needed areas through the Land Use and Transportation Element (LUTE)²¹⁸ and provide childcare during community engagement meetings to historically marginalized people, so they can participate in these meetings.²¹⁹

²¹³ Poblet, "Struggle for the Flatlands."

²¹⁴ Monique Brown (Executive Director, Mandela Partners), interview by Shishir Mathur, July 29, 2025.

²¹⁵ Brian Beveridge (Executive Director, West Oakland Environmental Indicators Project) interview by Shishir Mathur, June 30 and July 7, 2025.

²¹⁶ City of Oakland, "West Oakland Specific Plan, Final Plan," (Oakland, CA: City of Oakland, 2014), 10-27–10-28, <https://oaklandca.s3.us-west-1.amazonaws.com/oakca1/groups/ceda/documents/report/oak049130.pdf>.

²¹⁷ "Oakland Housing and Community Benefits," Public Advocates, accessed July 21, 2024, <https://publicadvocates.org/our-work-2/equitable-development/oakland-housing-community-benefits/>.

²¹⁸ City of Oakland, "Environmental Justice Element: Public Review Draft," March 21, 2023, 6-2, https://cao-94612.s3.amazonaws.com/documents/EJ-Element_032123-public-review-draft_reduced.pdf.

²¹⁹ City of Oakland, "Environmental Justice Element: Public Review Draft," 9-4.

A March 2014 article from *Advance the Struggle*, was highly critical of the WOSP, saying it placed the interests of developers and higher income, often white people, over the people of color who live in WO. The article advocated for community control over the redevelopment of WO and to go beyond getting the “input” of the community members.²²⁰ The Racial Equity Impact Analysis for the housing element (REIA) mentioned the existing partnerships with nonprofits and community-based organizations to increase community involvement in the development of more equitable policies. The REIA had goals to increase these partnerships, as well as hire staff to provide more support to Oakland’s marginalized communities.²²¹

A community advocate noted that Oakland has some of the strongest tenant protection policies but needs more resources to implement them. The City of Berkeley, a wealthier city than Oakland, is an example of a neighboring city that has the resources to provide annual rent stabilization information from the rent board and to invest in rental assistance and crisis funds. Oakland is always considering equity issues but is limited by budget and staff capacity to develop the types of partnerships outlined in the REIA goals.²²²

Another stakeholder noted that the city has long debated whether market-rate developers should contribute to affordable housing. There were efforts to look into inclusionary zoning (IZ) first in 2001, and then again in 2006–2007. A blue-ribbon commission charged with studying IZ and condominium conversions mildly recommended IZ. Then the foreclosure crisis hit. In 2009, in *Palmer vs. the City of Los Angeles*, the Second Circuit Court of Appeal held that the Costa-Hawkins Rental Housing Act precluded the City of Los Angeles from enforcing its inclusionary housing ordinance against newly-built rental units as it was considered rent control and violated the Costa-Hawkins Act of 1995, which restricts cities from imposing rent control on certain types of housing, such as single-family homes, condominiums, and units built after 1995. So, Oakland pivoted toward impact fees (IF). The city hired a consultant and set up a stakeholder working group.²²³

The IF was adopted in 2016 with a September 1, 2016 start date. It varies across three different zones and three housing types for a total of nine fee rates. It is phased over time. For example, the fee that started at \$5,500/unit in 2016 was raised to \$11,000 in July 2017, \$22,000 in July 2018, and is now about \$30,000. It is also adjusted annually based on changes in the building cost

²²⁰ "WOSP: The City of Oakland’s Plan for Gentrification – A Target for Anti-Displacement Activity," *Advance the Struggle*, March 29, 2014, <https://advancethestruggle.wordpress.com/2014/03/29/wosp-the-city-of-oaklands-plan-for-gentrification-a-target-for-anti-displacement-activity/>.

²²¹ "Racial Equity Impact Analysis for Oakland's Housing Element Update," *City of Oakland*, January 6, 2023, 5–7, https://cao-94612.s3.us-west-2.amazonaws.com/documents/Housing-Element-REIA-1.6.23_Final.pdf.

²²² Dr. Catherine Guimond (Data and Policy Officer, Centro Legal), interview by Shishir Mathur, July 14, 2025.

²²³ Jeff Levin (Senior Policy Director, East Bay Housing Organizations), interview by Shishir Mathur, July 8 and 15, 2025.

index. Developers are allowed to develop affordable housing units on-site instead of paying the fee. The on-site requirement was very weak, requiring 5% VLI, 10% LI, and 10% moderate income housing, which was also the minimum requirement to avail incentives under the state density bonus law. The city amended its density bonus ordinance to grant density increases to rental projects providing moderate-income housing. State law only provides density bonuses for ownership units.²²⁴

OCIA was a coalition led by EBHO in 2015–16 to secure the passage of the Affordable Housing Impact Fee. As a compromise with developers, the fee was structured so that half was due at the building permit approval stage and the other half at the certificate of occupancy (COO) stage. The deferment of payment yielded small savings to developers by avoiding accruing interest on that portion of the fee, but it delayed the revenue from becoming available to the city.²²⁵

Moreover, the city will not commit funds unless it receives cash in case the buildings do not reach COO stage. EBHO has been advocating for forward commitment of the second installment of fees on projects that have received a building permit, paid the first installment, and started construction, as there is little risk at that point that projects will not be completed and pay the full fee.²²⁶

For the last couple of years, the entire fee was due upfront. Then, in 2024, state law SB 9937 was passed and required deferral of public improvement impact fee to COO stage. Even though the law did not impact affordable housing impact fees, the city's planning department, which oversees impact fees, decided to apply the law to it for consistency's sake. The on-site requirements have been raised from 5% VLI, 10% LI, and 10% moderate to 10% VLI, 12% LI, and 15% moderate in Zones 1 and 2, with no change in Zone 3. Since the research showed that a lot of developers are going above the state density bonus law requirements, EBHO advocated for 15% (VLI) to 20% (moderate). The staff recommended exempting 2- to 4-unit multi-family and single-family smaller than 1,750 sq. ft. in floor area from paying impact fees. The Council member for District 6 supported suspending the fee for Zone 3 (East Oakland) to encourage housing development, and the Council member for District 2 supported converting her district from Zone 2 to Zone 3, effectively suspending the fee there as well. All these proposals recently went to the full city council and were adopted. The previous city council was more supportive of impact fees.²²⁷

In summary, the current status is that the council has decided to suspend the fee for East Oakland, up the on-site requirements to staff-suggested percentages, create new exemptions,

²²⁴ Levin, interview by Shishir Mathur, July 8 and 15, 2025.

²²⁵ Levin, interview by Shishir Mathur, July 8 and 15, 2025.

²²⁶ Levin, interview by Shishir Mathur, July 8 and 15, 2025.

²²⁷ Levin, interview by Shishir Mathur, July 8 and 15, 2025.

and deferred the fee to COO stage. It is not clear whether the deferment or suspension of the fee for East Oakland will spur housing development. In stakeholder meetings, developers had said that suspending the fee wouldn't result in an increase in development—they need rents to increase, interest rates to come down, and cost increases to moderate.²²⁸

The city does not have significant continuing funds for affordable housing. Two bond measures passed recently—KK (in 2016, with \$100 million set aside for affordable housing) and U (in 2024, with \$350 million set aside for affordable housing). All KK funds and half of U's \$350 million funds have been committed with the other half to be awarded in the next 2 years.

The City also receives funding from “boomerang funds” (the portion of former redevelopment tax increment funds that is now distributed to the City; Oakland committed 25% of this to affordable housing), but, starting in FY 2024–25, the City directed half of that 25% to the General Fund rather than to affordable housing.²²⁹

Furthermore, the City of Oakland has been working to mitigate the impact of foreclosures on homeowners. The City approved a study in 2012 through a pilot program called Restoring Ownership Opportunity Today (ROOT) to help qualified homeowners remain in their homes by reducing their principal and resetting mortgages to current market values. ROOT aimed to provide homeownership opportunities, prevent displacement, develop affordable housing, and restore abandoned homes.²³⁰

Moreover, the Oakland Community Land Trust (OakCLT) was set up to help stabilize Oakland neighborhoods and provide permanent affordable housing. OakCLT's goals are to purchase foreclosed or vacant properties and then sell them back to homeowners at an affordable price, where OakCLT retains land ownership. OakCLT has not developed very many homes, however.²³¹

Per WOSP, between 2014 and 2035, Oakland plans to build 15% of the needed affordable housing in the Plan Area. However, at the time of the 2014 plan, funding for these plans were not established. The plan had expectations to secure funding through LIHTC, Federal HOME funds, mortgage revenue bonds, and HUD programs. Oakland has an ordinance that 25% of the property tax the city receives goes towards affordable housing. Thus, it hopes to incentivize the development of affordable housing city wide and beyond the Plan Area.²³² The city does not have an inclusionary housing requirement, however.²³³ It seeks to promote diversity by encouraging

²²⁸ Levin, interview by Shishir Mathur, July 8 and 15, 2025.

²²⁹ Levin, interview by Shishir Mathur, July 8 and 15, 2025.

²³⁰ City of Oakland, "West Oakland Specific Plan, Final Plan," (Oakland, CA: City of Oakland, 2014), 10-24, <https://oaklandca.s3.us-west-1.amazonaws.com/oakca1/groups/ceda/documents/report/oak049130.pdf>.

²³¹ City of Oakland, "West Oakland Specific Plan, Final Plan," 10-25.

²³² City of Oakland, "West Oakland Specific Plan, Final Plan," 10-25–10-26.

²³³ City of Oakland, "West Oakland Specific Plan, Final Plan," 10-26.

the development of affordable housing throughout the city, thereby preventing it from being disproportionately located in certain areas.²³⁴

WO does not fare well in the LIHTC and HCD grant programs because it is not a high-resource area (HRA). Therefore, it has become harder to build affordable housing in WO and Oakland in general. Oakland's flatlands are not HRAs, although parts of it could be HRAs in the context of the state, just not in the context of the region.²³⁵

Oakland Planning Code Chapter 17.107 has a bonus and incentive program for developers to build affordable housing, as mandated by the California Government Code 65915. Developers are able to secure incentives, such as density bonuses and flexible parking and open space requirements, if they develop senior housing and day care facilities.²³⁶

Moreover, advocacy groups such as Causa Justa :: Just Cause had been pushing back on gentrification and were active in advocating for tenants' rights, particularly for people of color and low-income communities in Oakland.²³⁷ However, as of December 2024 they are no longer operational.²³⁸

Finally, Oakland's Housing Element identified that those who are homeless or at risk of becoming homeless need both housing support and economic opportunities. Hence, the City proposes to offer economic opportunities to the unhoused in addition to providing transitional housing opportunities. The City aims to disperse housing for the homeless throughout Oakland to avoid concentrating it in the most distressed neighborhoods.²³⁹

Combined housing-economic development tools

The Oakland Housing Authority's (OHA's) Family and Community Partnership (FCP) department provides digital literacy training at two Learning Labs, one of which is in WO. The labs provide in-person and online job training with plans to form partnerships with other employment agencies. The FCP has a full-time staff to support job training and small business development training for

²³⁴ City of Oakland, "West Oakland Specific Plan, Final Plan," 10-25.

²³⁵ Jeff Levin (Senior Policy Director, East Bay Housing Organizations), interview by Shishir Mathur, July 8 and 15, 2025.

²³⁶ City of Oakland, "West Oakland Specific Plan, Final Plan," (Oakland, CA: City of Oakland, 2014), 10-29, <https://oaklandca.s3.us-west-1.amazonaws.com/oakca1/groups/ceda/documents/report/oak049130.pdf>.

²³⁷ Maria Poblet, "Struggle for the Flatlands," *Convergence*, April 22, 2014, <https://convergenceimag.com/articles/struggle-for-the-flatlands/>.

²³⁸ Natalie Orenstein, "Causa Justa Closing after 22 Years of Tenant Organizing in Oakland and SF," *The Oaklandside*, December 6, 2024, <https://oaklandside.org/2024/12/06/causa-justa-closing-tenant-organizing-oakland-sf/>.

²³⁹ City of Oakland, *General Plan 2023–2031 Housing Element: Draft for Public Review* (May 2022), 90, <https://cao-94612.s3.amazonaws.com/documents/Oakland-Housing-Element-draft-ch1-4.pdf>.

OHA residents.²⁴⁰ The FCP has formed partnerships with community colleges and community organizations to provide employment opportunities to OHA residents.²⁴¹

Learning Labs also offer space to local community colleges and other CBOs, such as the Tech Exchange, to hold workshops, job fairs, employment training, etc. Two senior members of OHA shared that the need for services exceeds available funding, and it is often challenging to attract OHA members to use the services. OHA previously partnered with Oakland Unified School District (OUSD) and hopes to resume in the future to fund parents as school aides to reduce chronic student absenteeism and provide families with services and job training. 11% of OUSD students live in OHA-owned or managed units. Approximately 500 OUSD students are homeless or at risk of homelessness.²⁴²

The OHA partners with 7th Street Rise, which is a collaboration with WO Health Center, the City of Oakland, the county, and numerous CBOs. 7th Street Rise informs WO residents about development and redevelopment projects being built along the 7th Street corridor. OHA is part of many affordable housing development projects in WO, including, for example, the Black Panther Development on 7th Avenue, which provides resident support services for 2–3 years.

Two senior members of OHA shared that the outcomes of OHA programs and collaborations are difficult to measure, but OHA conducts annual post-evaluations with program participants. While OHA is part of three new affordable housing projects, building affordable housing has been difficult due to the high costs and long construction timelines.²⁴³

Furthermore, OHA participates in HUD’s Moving to Work program, which provides opportunities and resources for low-income households to strive for financial independence. OHA renamed the program Making Transitions Work (MTW). The primary purpose of the MTW program is to provide more affordable housing options to low-income residents and job training and skills development programs.²⁴⁴

Additionally, OHA planned to improve its Family Self-Sufficiency (FSS) program in conjunction with MTW to provide more opportunities for low-income households to obtain financial self-sufficiency in two ways. First, it did so by allowing the full-time student rule to apply to heads of

²⁴⁰ Oakland Housing Authority, Fiscal Year 2025 MTW Annual Plan, Draft, July 1, 2024–June 30, 2025, 157, <http://www.oakha.org/AboutUs/ReportsPolicies/Documents/Public%20Comment%20Draft-%20FY%202025%20Annual%20MTW%20Plan.pdf>.

²⁴¹ Oakland Housing Authority, Fiscal Year 2025 MTW Annual Plan, Draft, 158.

²⁴² Patricia Wells (Executive Director, Oakland Housing Authority) and Nicole Thompson (Director of Policy Implementation and Compliance, Oakland Housing Authority), interview by Shishir Mathur and Christopher Ferrell, August 6, 2025.

²⁴³ Wells and Thompson, interview by Shishir Mathur and Christopher Ferrell, August 6, 2025.

²⁴⁴ Oakland Housing Authority, Fiscal Year 2025 MTW Annual Plan, Draft, 9–10.

households or spouses.²⁴⁵ The full-time student rule only allows up to \$480 of income earned by the student to count towards the household income, preventing household rent burden from increasing and encouraging further education for families participating in FSS.²⁴⁶

Second, participants who earn above the maximum income for their rent calculation can place the additional funds in an escrow account to be used for employment training, education, a housing down payment, or other eligible activities. Households that earn \$0 to \$10,000 a year can save \$50 a month in escrow; \$50 for every \$10,000 saved can be placed in escrow for up to \$500 a month. The escrow funds can be taken out after 5 years, with a possible 2-year extension. In the last 15 years, 126 families who were earning less than 50% AMI have transitioned into homeownership. All OHA residents are eligible for the FSS program.²⁴⁷

OHA staff members noted that the community needs more job training programs and job opportunities and emphasized the need to keep residents energized and participating in community building.²⁴⁸

Another interviewee noted that Oakland has a good job-housing balance overall, but job-housing fit is an issue because there are several low-income jobs but not sufficient low-income housing. The port owns all the waterfront and leases it to businesses, but WO residents don't receive priority. Also, port jobs are well-paying, but WO residents are not given a preference there either. Notably, the port is a city department, but it considers itself regional.²⁴⁹

Non-housing economic development tools

In February 2022, the City of Oakland received a \$1 million federal grant to train low-income construction contractors and support low-income small businesses. The funding was split in half between the two groups and spent across two years. The City anticipates that the funds will help at least 1,100 small businesses and 50 contractors. Furthermore, the City partnered with The Unity Council and Black Cultural Zone CDC to do outreach, specifically in communities such as WO, to provide equitable economic opportunities to low-income neighborhoods. The outreach

²⁴⁵ Oakland Housing Authority, "Moving to Work (MTW) Annual Plan: Fiscal Year 2021," U.S. Department of Housing and Urban Development, 2021, 34, <https://www.hud.gov/sites/dfiles/PIH/documents/OaklandFY21Plan.pdf>.

²⁴⁶ Oakland Housing Authority, "Moving to Work (MTW) Annual Plan: Fiscal Year 2021," 34.

²⁴⁷ Wells and Thompson, interview by Shishir Mathur and Christopher Ferrell, August 6, 2025.

²⁴⁸ Wells and Thompson, interview by Shishir Mathur and Christopher Ferrell, August 6, 2025.

²⁴⁹ Jeff Levin (Senior Policy Director, East Bay Housing Organizations), interview by Shishir Mathur, July 8 and 15, 2025.

entailed identifying business training needs and providing financial, technological, and workforce resources.²⁵⁰

At the neighborhood level, the WOSP has a section specifically to address the economic distress in WO. Since WO lacks access to adequate businesses, grocery stores, pharmacies, and other services to support residents,²⁵¹ the plan proposes supporting and sustaining small businesses to provide amenities to residents as well as create job opportunities.²⁵² The WOSP also lists several nonprofits and public sector programs that support or provide job training and job placement, small business support, and youth programs.²⁵³

Moreover, in 2012, Oakland agreed to turn a former army base into an employment training site, the Oakland Global Trade and Logistics Center. Part of the agreement set by the Community Jobs Policies (CJP) was that half of those hired needed to be local, with an emphasis on providing opportunities to WO residents.²⁵⁴ The WO Job Resource Center (WOJRC) was established to support WO residents with employment opportunities in construction and logistics through the Army Base.²⁵⁵ It provides job training and job placement support.²⁵⁶

After 10 years, the Jobs Policy achieved about 48% local hire, which was below their goal. Only 22 people from WO were hired during the construction phase, and of those, only 11 workers got the 1000 hours of work to qualify as Apprentices.²⁵⁷

Another center—the Cypress Mandela Training Center (Cypress Mandela)—provides job training in skilled trades and has placed 98% of its graduates into jobs;²⁵⁸ however, the training program requires significant family support, as it is 40 hours per week, unpaid, for eight weeks. It can be challenging for individuals to sustain that commitment. Those who complete the program receive tools and work clothes from WO JRC. The problem in relying heavily on construction jobs is that the industry needs fewer and fewer people, and those who get these jobs tend to move out of

²⁵⁰ City of Oakland, "Small, Low-Income Contracting Business Support Programs Launched," City of Oakland, accessed August 28, 2024, <https://www.oaklandca.gov/news/small-low-income-contracting-business-support-programs-launched>.

²⁵¹ City of Oakland, "West Oakland Specific Plan, Final Plan," (Oakland, CA: City of Oakland, 2014), 10-36, <https://oaklandca.s3.us-west-1.amazonaws.com/oakca1/groups/ceda/documents/report/oak049130.pdf>.

²⁵² City of Oakland, "West Oakland Specific Plan, Final Plan," 10-36.

²⁵³ City of Oakland, "West Oakland Specific Plan, Final Plan," 10-39.

²⁵⁴ City of Oakland, "West Oakland Specific Plan, Final Plan," 10-38.

²⁵⁵ City of Oakland, "West Oakland Specific Plan, Final Plan," 10-40.

²⁵⁶ City of Oakland, "West Oakland Specific Plan, Final Plan," 10-40.

²⁵⁷ Brian Beveridge (Executive Director, West Oakland Environmental Indicators Project) interview by Shishir Mathur, June 30 and July 7, 2025.

²⁵⁸ City of Oakland, "West Oakland Specific Plan, Final Plan," 10-40.

WO to places with a lower cost of living. As a result, the trained people and the economic benefit to local businesses are lost.²⁵⁹

Moreover, Mandela Partners is a non-profit that provides several programs and services to WO residents, such as financial training, entrepreneurship training and opportunities, and access to microlending partnerships. They had a youth organization called West Oakland Youth Standing Empowered (WYSE) that provided various opportunities for students to be involved in their community, until it ended in 2013. They also distribute produce to community stores and markets through its Healthy Neighborhood Store Alliance program.²⁶⁰

Apart from food access and distribution, Mandela Partners works with early-stage food entrepreneurs, provides training and coaching, and conducts workshops through an entrepreneur incubation program. Mandela Partners helps entrepreneurs create viable business and operating plans, organize their taxes, plan budgets, and help them get started as an incubator, caterer, or pop-up center. For example, Mandela Partners incubated the Mandela Grocery Co-Op.²⁶¹

Mandela Partners also operates a food hall in the Ashland Community in the San Leandro area, with support from Alameda County, where entrepreneurs can apply to operate their businesses at a \$1/year lease. Mandela Partners is looking to open a similar food hall in Oakland. In summary, Mandela Partners supports food-based economic.²⁶²

Further highlighting ways to promote local economic development, a local CBO's staff member noted that banks do not service small-business loans of \$10,000 to \$100,000, and that commercial lending rates are high. Small direct lending programs are much needed for all small neighborhood businesses.²⁶³

Moreover, Oakland's Environmental Justice Element has several food access and food systems goals. Goals for improving food access are as follows:

1. Seek healthy grocers to establish in Oakland, especially in residential and underserved areas.
2. Improve and expand the City's Community Gardens Program.

²⁵⁹ Beveridge interview by Shishir Mathur, June 30 and July 7, 2025.

²⁶⁰ City of Oakland, "West Oakland Specific Plan, Final Plan," 10-44.

²⁶¹ Brown, interview by Shishir Mathur, July 29, 2025.

²⁶² Brown, interview by Shishir Mathur, July 29, 2025.

²⁶³ Beveridge, interview by Shishir Mathur, June 30 and July 7, 2025.

3. Support home and community gardens with an emphasis on providing resources to underserved communities through financial incentives and technical assistance. Explore permitting and financial incentives for converting vacant land.
4. Support sustainable urban agriculture—including rooftop gardens, edible gardens, indoor gardens, and gardens in commercial and industrial areas—and lower permit costs for large-scale farming.
5. Support street vending and alternative pop-up food businesses, including indoor farming in industrial areas.

Goals for food assistance area as follows:

1. Provide information to those who need food assistance through City newsletters, websites, and facilities. Inform merchants that accepting food assistance payments will increase their customers. Additionally, work with community organizations to provide food to low-income individuals who are not eligible for food assistance, through grants or other funding.
2. Coordinate between the community organizations, OUSD, the County, and public agencies to make sure residents who are eligible for food assistance have access through local, state, and federal programs. Work with these service providers to ensure food distribution happens at low access to food areas during an emergency.
3. Work with local agencies and community organizations to provide educational materials and curriculum on growing and eating healthy food. These materials and education are to be provided to the Oakland Unified School District and community organizations that focus on food justice and education. Additionally, provide incentives for land transfers or reduced water rates, educational resources, and technical assistance to community organizations.

Finally, the goal for food recovery is to “Work with food systems organizations in Oakland to distribute food that would be wasted, create food sources in community gardens and parks, improve food storage capacity and distribution through collaboration with local organizations, recover food from major food generators such as supermarkets, wholesale, hotels, and institutions, as well as education major food generators with food waste prevention.”²⁶⁴

²⁶⁴ City of Oakland, "Environmental Justice Element: Public Review Draft," March 21, 2023, 5-6–5-7, https://cao-94612.s3.amazonaws.com/documents/EJ-Element_032123-public-review-draft_reduced.pdf.

4.3.4 Regional- and state-level tools to mitigate socio-economic disadvantage

Of the regional-level housing strategies noted in the One Bay Area 2050 Plan, Strategies H1-H4 are being implemented in WO (see Chapter 3.1.3.1 for descriptions of the strategies). Rent stabilization has been in place since 1983, and two to four units are allowed by right in single-family zones to provide missing middle housing. In fact, many parts of Oakland are over-zoned, meaning more density is allowed than is being built. In such a scenario, it would be helpful to see whether density bonuses are primarily used for concessions (parking reductions, height relaxations, etc.) rather than for up-zoning. City funds are being used for unhoused and low-income people by requiring 20% of housing to be affordable to ELI. Actual numbers are closer to 30% over the past 5 years. Also, the Homekey program is rapidly creating housing for the homeless. Inclusionary housing is not being implemented, but the city collects impact fees.²⁶⁵

In WO, LIHTC, SB 35, AHSC, infill infrastructure grants, etc., are being used. In Oakland, SB 35 would be used only for 100% affordable projects. SB 35 specifies that in cities that have met or exceeded their RHNA goals for above-moderate housing, streamlined approval requires 50% affordable housing.²⁶⁶

Table 4.1 notes the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various socio-economic disadvantages.

²⁶⁵ Levin, interview by Shishir Mathur, July 8 and 15, 2025.

²⁶⁶ Levin, interview by Shishir Mathur, July 8 and 15, 2025.

Table 4.1 WO: Strategies to Mitigate Socio-Economic Disadvantage

Literature	Used/noted in local, regional, state, and federal plans; and interviews				
	PDA	City	County/Regional	State	Federal
Provide affordable housing in HRAs.	No tools at the PDA-level, since it is a DAC, not an HRA.	It seeks to promote diversity by encouraging the development of affordable housing throughout the city to prevent certain areas from being disproportionately the location of affordable housing.	ABAG housing strategies.	CalHFA Programs, tax credit program, and affordable housing legislation.	LIHTC, CDGB, HOME, and vouchers.
Provide mixed-income housing in low-income neighborhoods.	WOSP: Impact fees to develop affordable housing.	City ordinance that requires 25% of the property tax the city receives to go towards affordable housing.	ABAG housing strategies.	State Tax Credit Program, CA HCD Infill Infrastructure Grant Program, AHSC funds, and State Density Bonus Law.	LIHTC, CDGB, HOME, and vouchers.
Affordable child care.		Oakland Environmental Justice Element of the city's General Plan recognizes the need for more childcare, the need for existing free and subsidized childcare, and has the goal of increasing more childcare locations.			

Literature	Used/noted in local, regional, state, and federal plans; and interviews				
Child support mechanisms				Head Start program (City of Oakland, Environmental Justice Element).	
Place-based strategies for example, investing CDBG and CRA funds in local neighborhoods, and other local economic development strategies, such as those to create jobs, provide job training, increase basic education, implement universal basic income, revitalize neighborhoods, and locate jobs in high-quality communities.	WOSP: There are several WO job training and job placement programs: CJP, WOJRC, Mandela.	OHA's MTW and FSS programs. Training low-income small businesses and construction contractors.	ABAG strategies: universal basic income, job training, and incentives to attract employers.	State Tax Credit Program, CARB California Climate Investment funds, Workforce Innovation and Opportunity Act (WIOA), State of CA Workforce Development Board's Unified Strategic Workforce Development Plan, American's Job Center of California (AJCC), and High Road Training Partnerships.	CRA, CDBG, and SBA Loans.
Reduce disparities in accessing quality health care.				CARB California Climate Investments.	

Literature	Used/noted in local, regional, state, and federal plans; and interviews				
Enhance access to healthy foods.	WOSP: Mandela MarketPlace associated youth program distributes produce to community stores and markets through a program called Healthy Neighborhood Store Alliance. Mandela Partners is active in the Senior Farmers Market Nutrition program.²⁶⁷	EJ Element Food goals: EJ5.1-5.9.		SNAP, CNIP, WIC, and Seniors Farmers Market Nutrition Program. Assembly Bill 581: The Healthy Food Financing Initiative.	

²⁶⁷ Brown, interview by Shishir Mathur, July 29, 2025.

4.4 Educational Dimension (sub-dimensions ED1 and ED2)

4.4.1 Summary of disadvantages

Under the Educational dimension, Mathur and Ferrell (2024) found that WO is in the bottom quartile under both sub-dimensions—ED1 (overall low level of education) and ED2 (low-quality K–12 education).²⁶⁸

4.4.2 Impacts

Indeed, at the city-level, Oakland has a higher rate than the national average of people who do not have a high school diploma²⁶⁹ and 44.3% of its residents living below the poverty line have less than a high school education.²⁷⁰ Furthermore, WO scores among the lowest in Oakland on educational opportunities based on proficiency scores in math, language, and arts, and the percentage of the population with a high school diploma or more.²⁷¹

4.4.3 Local tools to mitigate education-related disadvantage

The city and WO-level tools primarily focus on supporting students and in providing employment opportunities through education.

Focusing on the former, as a city-wide measure, the OHA has partnered with OUSD to build partnerships between schools and the community that facilitate schools becoming Full-Service Community Schools. Such schools connect students and parents to local resources and community support.²⁷² Furthermore, the Oakland Environmental Justice Element of the General Plan states the need for early childhood education as a foundation for safety and good health. There are several federally funded Head Start program locations across the city. This program supports school readiness for children between birth and age five from low-income families, but none exist west of Interstate 580, where WO is located.²⁷³

Focusing on the latter, several neighborhood-level programs focus on job-readiness and education for youth, and some extend these programs to young adults. City Slickers Farms is an urban agriculture program offering internships for youth and young adults; Mandela Marketplace provides nutritional and public speaking education for youth; and the Prescott Joseph Center for

²⁶⁸ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

²⁶⁹ Haley et al., "Neighborhood-Level Determinants of Life Expectancy in Oakland, CA," 18.

²⁷⁰ Haley et al., "Neighborhood-Level Determinants of Life Expectancy in Oakland, CA," 18.

²⁷¹ Haley et al., "Neighborhood-Level Determinants of Life Expectancy in Oakland, CA," 18.

²⁷² City of Oakland, "West Oakland Specific Plan, Final Plan," 10-12.

²⁷³ City of Oakland, "Environmental Justice Element: Public Review Draft," March 21, 2023, 6-2, https://cao-94612.s3.amazonaws.com/documents/EJ-Element_032123-public-review-draft_reduced.pdf.

Community Enhancement provides job training and placement for youths aged 15 to 18. The Crucible provides technical and leadership training, and American Steel Studios provides internship opportunities in metalwork and the business of art.²⁷⁴

Located in WO, McClymonds High School has the Global Trade Academy (GTA) which prepares students for careers in international trade and business. McClymonds High School's STEM program prepares students for high-tech careers and other STEM-related fields. Laney College is a community college in WO that offers associate degrees and certificate programs in biotechnology, manufacturing, construction, and other industries.²⁷⁵

On a larger note, the WOSP specifies the need for residents to have fruitful gains from job readiness programs and educational institutions by having employment opportunities. WO aims to continue to foster partnerships with various industries to facilitate job placement for residents. The city is interested in working with the WOJRC to partner with the community, community organizations, educational institutions, and hiring industries to create more job opportunities for residents.²⁷⁶

Furthermore, Proposition 98 was passed in 1988 to guarantee that K–12 schools and community colleges receive a minimum amount of funding through a combination of state and property taxes through the Local Control Funding Formula (LCFF).²⁷⁷ LCFF is applicable for those school districts that cannot meet their funding needs through local property taxes. Public schools in WO are in OUSD, which receives 69% of funding through LCFF.²⁷⁸ School districts whose entire funding needs are met through property taxes are basic aid districts. Any basic aid funding that exceeds the needs of the district is kept by the district. This makes for equity issues among districts in California because basic aid districts often have more funding than LCFF-funded districts.²⁷⁹ Approximately 13% of districts in California were basic aid school districts in the 2021–2022 school year.

²⁷⁴ City of Oakland, "West Oakland Specific Plan, Final Plan," 10-39.

²⁷⁵ City of Oakland, "West Oakland Specific Plan, Final Plan," 10-39.

²⁷⁶ City of Oakland, "West Oakland Specific Plan, Final Plan," 10-45.

²⁷⁷ California Department of Finance, *2020–21 Budget Summary: K–12 Education*, 68, accessed March 21, 2025, <https://ebudget.ca.gov/2020-21/pdf/BudgetSummary/K-12Education.pdf>.

²⁷⁸ Oakland Unified School District, "California and OUSD School Finance Overview," last modified 2023, accessed February 28, 2025, <https://www.ousd.org/business-services/ca-and-ousd-school-finance-overview#:~:text=To%20better%20address%20equity%2C%20the,previously%20established%20under%20Proposition%2049.>

²⁷⁹ Ed100, "Basic Aid: Why Some School Districts Have Extra Money," accessed February 28, 2025, <https://ed100.org/blog/basic-aid#:~:text=In%202022%2D23%2C%20just%203.7,involvement%20in%20getting%20to%20yes.>

OUSD has four programs focused on delivering educational services and community-building among historically underserved students and their families:

1. African American Female Excellence (AAFE): Focused on providing daily classes and student group activities “that empower Black girls and young women, fostering a sense of belonging, pride, and leadership.” According to OUSD, the benefits of this program include increased attendance and reduced chronic absences and a measured 6% improvement in AAFE students to “‘perspective take’ when faced with conflicting points of view.”²⁸⁰
2. African American Male Achievement (AAMA): This program, focused on addressing the needs of African American/Black male students, was the first such department established at the district level in the U.S. in 2010. It offers academic classes and mentoring for more than 500 students in K–12 schools in the district. According to OUSD, the program has increased the average daily attendance rate of its students to 90% compared to the district average of 84% for Black males and improved their postsecondary readiness by having them identify a goal, submit a financial aid application, and complete at least one post-secondary application.²⁸¹
3. Arab American and Asian Pacific Islander Student Achievement (AAPISA): Focused on creating a culture of belonging for AAPISA students and their families with “literacy supports, affinity spaces, representation, student advocacy, family engagement, and culturally responsive professional development.” OUSD reports that this program has increased family engagement, increased attendance rates, and increased literacy rates.²⁸²
4. Latino Student Achievement (LSA): Addresses the systemic conditions, culture, and competencies necessary to advance student achievement for Latino OUSD students. Their initiatives include an “A-G Chicano/Latino accredited course, where students can earn elective credit on their Transcript,” affinity clubs, literacy mentoring, parent

²⁸⁰ Oakland Unified School District, Office of Equity, "African American Female Excellence," accessed December 17, 2025, <https://resources.finalsite.net/images/v1736276416/ousdorg/qhks8egpr611lckcosk4/OUSDOfficeofEquity-FactSheet-AAFE.pdf>.

²⁸¹ Oakland Unified School District, Office of Equity, "African American Male Achievement."

²⁸² Oakland Unified School District, Office of Equity, "Arab Asian Pacific Islander Student Achievement," accessed December 17, 2025, <https://resources.finalsite.net/images/v1736276466/ousdorg/nukytheok93fbyerlujb/OUSDOfficeofEquity-FactSheet-AAPISA.pdf>.

advisory services, district-wide professional development support, and measures to retain Latino teachers and staff.²⁸³

Finally, OUSD operates full-service community schools (FSCS), providing: (1) integrated, wraparound support systems for mental and physical health care; (2) enriched and expanded learning time and opportunities, including lengthening the school day and year, and student-centered learning; (3) active family and community engagement; and (4) collaborative leadership practices that coordinate school services and inclusive decision-making.²⁸⁴

Tables 4.2 and 4.3 note the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various education-related disadvantages.

²⁸³ Oakland Unified School District, Office of Equity, "Latino Student Achievement," accessed December 17, 2025, <https://resources.finalsite.net/images/v1736276490/ousdorg/nlioddpcvbcqtunukugr/OUSDOfficeofEquity-FactSheet-LSA.pdf>.

²⁸⁴ S. Klevan, J. Daniel, K. Fehrer, and A. Maier, "Creating the Conditions for Children to Learn: Oakland's Districtwide Community Schools Initiative," Learning Policy Institute (2023). <https://doi.org/10.54300/784.361>.

Table 4.2 WO: Strategies to Improve Education at the Community Level

Literature	Used/noted in local, regional, and state plans; and interviews			
	PDA	City	Regional	State
Labor-market relevant educational programs and partnerships with employers to develop educational programming. ²⁸⁵	Vocational training and placement for youth and young adults.	Job readiness and educational programs for youth and young adults. Mandela MarketPlace; Prescott Joseph Center for Community Enhancement; and City Slicker Farms.		High Road Training Partnership; AJCC; CAEP; and College and Career Access Pathways Grant.
Targeted outreach to early school leavers, adults, racial minorities, and other socio-economically disadvantaged populations. ²⁸⁶		OUSD: AAFE, AAMA, AAPISA, and LSA.		High Road Training Partnership California State Library's LTSA Community Impact Grants – fund local projects and community needs.
Financial assistance, and online/hybrid classes. ²⁸⁷				
Local/community learning centers ²⁸⁸		OUSD is a full-service community schools (FSCS) district.		America's Job Center for California (AJCC); High Road Training Partnerships; CAEP; and CCAP.
Guidance and counseling services. ²⁸⁹		OUSD: AAFE, AAMA, AAPISA, and LSA.		

²⁸⁵ Simon Broek and Barry J. Hake, "Increasing Participation of Adults in Higher Education: Factors for Successful Policies," *International Journal of Lifelong Education* 31, no. 4 (2012): 397–417, <https://doi.org/10.1080/02601370.2012.663801>.

²⁸⁶ Broek and Hake, "Increasing Participation of Adults in Higher Education."

²⁸⁷ Broek and Hake, "Increasing Participation of Adults in Higher Education."

²⁸⁸ Broek and Hake, "Increasing Participation of Adults in Higher Education."

²⁸⁹ Broek and Hake, "Increasing Participation of Adults in Higher Education."

Table 4.3 WO: Strategies to Improve the Quality of K–12 Education

Literature	Used/noted in local, regional, state, and federal plans; and interviews				
	PDA	City	Regional	State	Federal
Improving teachers' quality through higher teacher salary, professional development opportunities, and performance-based pay. ²⁹⁰					Title II, Part A
Core instructional strategies: Evidence-based literacy instruction, ²⁹¹ personalized/individualized learning models ²⁹² ; inquiry-based and active learning, ²⁹³ and targeted interventions and data-driven adjustments. ²⁹⁴				California School Dashboard Universal Transitional Kindergarten (UTK).	Title III, Part A
Systemic and equity-focused reforms: school finance reform, ²⁹⁵ standards-based reform (SBR), ²⁹⁶ strengthening	Link education with employment.	OUSD: More focus on STEM. OUSD: AAFE, AAMA, AAPISA, and LSA.		Local Control and Accountability Plan (LCAP); and Community Schools Partnership Program.	Title I, Part A; and Title IV, Part A: Student Support and Academic Enrichment

²⁹⁰ Thomas C. Dawson and K. Lloyd Billingsley, *Unsatisfactory Performance: How California's K–12 Education System Protects Mediocrity and How Teacher Quality Can Be Improved* (September 2000), <https://eric.ed.gov/?id=ED453152>.

²⁹¹ "Literacy Lens: Effective Literacy Practices for Secondary Students," Education Northwest, accessed December 5, 2025, <https://educationnorthwest.org/insights/literacy-lens-effective-literacy-practices-secondary-students>.

²⁹² "7 Student-First Solutions for Education That Can Make a Difference," Stand Together, accessed December 5, 2025, <https://standtogether.org/stories/education/ways-to-improve-the-quality-of-education-in-the-us>.

²⁹³ Moreno, "K–12 Science Education Reform."

²⁹⁴ Hanover Research, "8 Ways to Close the Achievement Gap in Schools."

²⁹⁵ Kirst, "Standards-Based Education Reforms."

²⁹⁶ Kirst, "Standards-Based Education Reforms."

Literature	Used/noted in local, regional, state, and federal plans; and interviews				
college and career pathways, ²⁹⁷ and equitable use of technology. ²⁹⁸				California Universal Meals (UMP); Summer Matters Campaign; After School Education and Safety (ASES); Charter School Facility Grant Program; (SB740); Public Charter Schools Grant Program (PCSGP); College and Career Access Pathways Grant; and California Adult Education Program (CAEP).	(SSAE) Grants. Individuals with Disabilities Education Act (IDEA); and Perkins Career and Technical Education Act.
Supporting the whole child and community: whole-child approaches and wraparound services, ²⁹⁹ fostering school connectedness and positive climate, ³⁰⁰ and partnerships and community engagement. ³⁰¹		OUSD is a full-service community schools (FSCS) district.		California Universal Meals (UMP); California State Preschool Program (CSPP); and After School Education and Safety (ASES).	Title IV, Part A: Student Support and Academic Enrichment (SSAE) Grants; Individuals with Disabilities Education Act (IDEA); Head Start; Child and Adult Care Food

²⁹⁷ James, “K–12 Education.”

²⁹⁸ James, “K–12 Education.”

²⁹⁹ James, “K–12 Education.”

³⁰⁰ Robert Balfanz, Angela Jerabek, Krystal Payne, and Jenny Scala, “Strengthening School Connectedness to Increase Student Success,” *EdResearch for Action*, Overview Brief no. 29 (May 2024), <https://edresearchforaction.org/wp-content/uploads/55011-EdResearch-School-Connectedness-Brief-29-FINAL.pdf>.

³⁰¹ Hanover Research, “8 Ways to Close the Achievement Gap in Schools.”

Literature	Used/noted in local, regional, state, and federal plans; and interviews				
					Program (CACFP); National School Lunch Program (NLSP); and School Breakfast Program (SBP).

4.5 Environmental Dimension (sub-dimensions EN1, EN2, EN3)

4.5.1 Summary of disadvantages

As per Mathur and Ferrell (2024), WO was not in the top quartile for the state for air pollution and ground pollution (minus lead). However, it was in the top quartile for the state for children’s lead risk exposure from housing.³⁰²

4.5.2 Impacts

Air pollutants increase cancer risk.³⁰³ Even though Mathur and Ferrell (2024) did not find WO to be in the top quartile of the state for air pollution, diesel particulate matter, in particular, contributes to the greatest risk of causing cancer in WO.³⁰⁴ The neighborhoods on Third Street, Seventh Street, and the West Prescott sub-neighborhood have the highest risk of cancer from air pollution.³⁰⁵ The pollutants that cause poor air quality are generated from the concentration of transportation, sea vessels, and industrial activities, and also contaminate groundwater.³⁰⁶

Moreover, according to the Bay Area Air Quality Management District (BAAQMD), WO is impacted by multiple sources of transportation-related air pollution generated from multiple freeways, industries, the Port of Oakland, public transportation lines, and a post office distribution center. Compared with other parts of Oakland, WO residents are more likely to visit

³⁰² Mathur and Ferrell, Are California’s Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

³⁰³ Roselle De Guzman and Jan Schiller, “Air Pollution and Its Impact on Cancer Incidence, Cancer Care, and Cancer Outcomes,” *BMJ Oncology* 4, no. 1 (March 2025), <https://doi:10.1136/bmjonc-2024-000535>.

³⁰⁴ De Guzman and Schiller, “Air Pollution and Its Impact on Cancer Incidence.”

³⁰⁵ Bay Area Air Quality Management District, *Owning Our Air: The West Oakland Community Action Plan Summary* (San Francisco: Bay Area Air Quality Management District, 2019), 6, <https://www.baaqmd.gov/~media/files/ab617-community-health/west-oakland/2019-meetings/100219-files/owning-our-air-plan-summary-pdf.pdf?rev=707aca6a0a674e2291acd1ebbc1bf07>.

³⁰⁶ Bay Area Air Quality Management District, *Owning Our Air: The West Oakland Community Action Plan Summary*, 6.

the emergency room for asthma. They also experience higher instances of death from air pollution-related diseases, such as heart attacks, heart disease, strokes, cancer, and lower respiratory diseases.³⁰⁷ Furthermore, these air quality conditions are disproportionately concentrated in WO among the people of color and low-income residents due to systemic racism, including the practice of redlining.³⁰⁸ Starting 1930s, neighborhoods across major U.S. cities were mapped by the federal government and graded A–D with those with D marked in red to designate them as risky for investment. Banks used these maps to refuse mortgages, insurance, and loans to residents in redlined areas, regardless of individual creditworthiness. These neighborhoods were primarily inhabited by low-income minorities.³⁰⁹

Similarly, the Oakland Environmental Justice Element identified significant air and water quality concerns in some parts of WO.³¹⁰ These areas—which this document calls Acorn, Acorn Industrial, Prescott/Mandela Peralta, Hoover/Foster, and Jack London Gateway—are places in WO identified in the top 10 percent of the state’s census tracts with poor air quality.³¹¹ Out of a possible score of up to 1.00, under air quality impacted by PM2.5, Hoover/Foster scored 0.93. Under air quality impacted by diesel, Acorn scored 0.97, Acorn Industrial scored 0.99, Prescott/Mandela Peralta scored 0.92, and Jack London Gateway scored 0.99.³¹²

In a similar vein, over half the census tracts in Oakland score in the 80th percentile or more for groundwater threats, per CalEnviroScreen 4.0.³¹³ Those who live closer to the water, such as the WO residents, are at a higher risk than those who live in the hills. In addition to the proximity to these transportation and industrial facilities causing groundwater contamination, spills and leaks have contributed to groundwater contamination.³¹⁴ Within WO, Hoover/Foster is in the top 10% of the most polluted census tracts on the water quality measures, scoring 0.93 out of a possible score of 1.00 on groundwater threats.

³⁰⁷ Bay Area Air Quality Management District, *AB 617 in West Oakland: West Oakland Community Action Plan*, 17, https://www.baaqmd.gov/~media/files/ab617-community-health/west-oakland/final_ab-617-in-west-oakland-pdf.pdf?rev=b47178d004774010a3830679f9e7f556&sc_lang=en.

³⁰⁸ ³⁰⁸ Bay Area Air Quality Management District, *AB 617 in West Oakland: West Oakland Community Action Plan*, 17–18.

³⁰⁹ University of Richmond, “Mapping Inequality: Redlining in New Deal America,” <https://dsl.richmond.edu/panorama/redlining/>.

³¹⁰ City of Oakland, “Environmental Justice Element: Public Review Draft,” March 21, 2023, 3–4, https://cao-94612.s3.amazonaws.com/documents/EJ-Element_032123-public-review-draft_reduced.pdf.

³¹¹ City of Oakland, “Environmental Justice Element: Public Review Draft, 3–4.

³¹² City of Oakland, “Environmental Justice Element: Public Review Draft, 3–4.

³¹³ Bay Area Air Quality Management District, *Owning Our Air: The West Oakland Community Action Plan Summary* (San Francisco: Bay Area Air Quality Management District, 2019), 3–10, <https://www.baaqmd.gov/~media/files/ab617-community-health/west-oakland/2019-meetings/100219-files/owning-our-air-plan-summary-pdf.pdf?rev=707aca6a0a674e2291acd1ebbc1bf07>.

³¹⁴ Bay Area Air Quality Management District, *Owning Our Air*, 3–12.

Further detailing ground pollution-related concerns, a local CBO staff member noted that there are also significant stormwater contamination issues at the truck yards, where oil, residual material in containers, grime, etc., are washed into drains and then into the Bay, unregulated. Homeless people in their RVs dump soiled water into drains. None of these activities is being monitored. This member also noted that a lawyer from Santa Rosa filed a lawsuit against the trucking industry under the Clean Water Act because he found big drains in the middle of the truck parking yard where contaminated water drained into them unregulated. Moreover, vehicle fires are another significant source of toxic pollutants in storm drains. No agency appears to have jurisdiction or a mandate to clean up the remains of burned vehicles, which contain plastics, heavy metals, and petroleum.³¹⁵

Furthermore, while there are no landfills in WO, WO has six recycling companies that are highly polluting but operate as green industries because they recycle. They have significant impacts on air, water, and soil. Since the 1980s, they have been operating under waivers from various hazardous waste laws and are now trying to codify those waivers.³¹⁶

Lead exposure is most likely from lead paint from homes built before 1978 and lead contamination in the soil, which creates multiple sources of lead exposure.³¹⁷ Over half of homes built before 1978 have lead-based paint. In Oakland, over 80% of houses were built before 1979.³¹⁸

Lead is particularly toxic to children, and compared to the rest of the Bay Area, Oakland has one of the largest populations of children under the age of six.³¹⁹ Children in WO have some of the highest levels of lead exposure in the county and the state. In a 2012 Alameda County blood lead level test of children between ages zero and five, 7.11% of WO children had a blood lead level of 4.5mcg/dl or greater. The national average is 2.5%.³²⁰

The lead in water pipes is eliminated when buildings are renovated. Lead was found in OUSD water fountains. Efforts to upgrade water fountains are unclear, however.³²¹

³¹⁵ Beveridge interview by Shishir Mathur, June 30 and July 7, 2025.

³¹⁶ Beveridge, interview by Shishir Mathur, June 30 and July 7, 2025.

³¹⁷ Alameda County Public Health Department, *Health and Housing in Oakland: Housing Habitability and Public Health* (Oakland: Alameda County Public Health Department, 2014), 7, <https://www.acgov.org/cda/lead/documents/news/health,housinginoakland.pdf>.

³¹⁸ Alameda County Public Health Department, *Health and Housing in Oakland*, 8.

³¹⁹ Tara Duggan, "Lead Contaminating Bay Area Neighborhoods from Freeways, Industry, and House Paint," *SFGate*, February 18, 2022, <https://www.sfgate.com/local/article/Lead-contaminating-Bay-Area-neighborhoods-16921146.php>.

³²⁰ Alameda County Public Health Department, *Health and Housing in Oakland*, 9.

³²¹ Beveridge interview by Shishir Mathur, June 30 and July 7, 2025.

4.5.3 Local tools to mitigate environmental disadvantage

Local tools to mitigate air pollution

At the PDA level, *The Owning Our Air: West Oakland Community Action Plan* identifies strategies to minimize the impact of air pollution on WO: relocate businesses that are sources of pollution away from residents, move towards a zero-emissions port by 2035, replace diesel trucks with cleaner alternatives, increase the monitoring of industrial activities, improve transit, and reduce backyard wood fires.³²²

The local CBO staff notes that though the *Owning Our Air* plan has been implemented, there have been recent setbacks. The data shows that carbon particulates rise by 50% in winter. Some people are still using fireplaces. WOEIP conducted educational outreach about it. 90% of the strategies identified in the plan are in implementation by the responsible agency, and WOEIP is implementing several research projects noted in the strategies. Furthermore, several polluting businesses can be relocated. For example, there is an aluminum smelter in the middle of the neighborhood. The area called the North Gateway (21 acres) is available to be redeveloped. While several private sector ideas have been entertained, community members' ideas have not been honored, however.³²³

Finally, millions of dollars in subsidies are provided to the trucking industry to reduce diesel emissions. In the 1990s, federal and state regulations required the incorporation of electric ignitions in diesel trucks. Starting in 2008, diesel particulate filters were required. Particulate filters and catalytic converters are now standard elements of new trucks. Recent data show very low levels of black carbon on neighborhood streets. Since then, most funds have gone toward zero-emission trucks as part of the NorCal ZERO program—either battery-operated or hydrogen fuel cell-powered trucks. Both technologies significantly increase truck weight (the battery itself weighs 10,000 pounds, and the hydrogen fuel-cell truck weighs 32,000 pounds, compared to a 12–16,000-pound diesel truck). Penetration is low despite about 80% subsidies.³²⁴

The WOEIP has tracked the sources of pollution in WO for over two decades. They continue to partner with the BAAQMD to assess air pollution to demonstrate the disproportionate concentration that exists in WO.³²⁵ *The Owning Our Air* plan has a goal to reduce diesel particulate matter from the 2017 baseline level of 0.3 micrograms per cubic meter to less than 0.13 micrograms per cubic meter by 2030. For PM_{2.5}, their goal is to reduce it from the 2017

³²² Bay Area Air Quality Management District, *Owning Our Air*, 8.

³²³ Beveridge, interview by Shishir Mathur, June 30 and July 7, 2025.

³²⁴ Beveridge, interview by Shishir Mathur, June 30 and July 7, 2025.

³²⁵ Bay Area Air Quality Management District, *Owning Our Air*, 6.

baseline of 1.7 micrograms per cubic meter to less than 1.2 micrograms per cubic meter.³²⁶ Finally, the City notes that they will mitigate poor air quality by prioritizing areas most affected through the use of air filters and urban greening or buffering.³²⁷

The Air District and CARB proposed 5- and 10-year goals, and the community agreed. The 5-year goal is to bring air quality to the median for WO (it ranged from 0.22 to 1.75 micrograms across locations within 1 mile of each other). The median level for black carbon at the time of drafting the plan was 50 micrograms per cubic meter as measured by the Air District's monitors at one location—Union Street. However, mobile air monitoring devices recorded a range of air quality across WO. Toxic air concentrations have been successfully reduced below the median. Every indicator of poor air quality came down except particulate matter. Currently, WO is ahead of the 5-year goal. Black carbon is down 50–55%. Cancer risk is down 30–35%. The 10-year goal is to match the lowest level within the community. In WOEIP's "100x100" stationary monitoring project, with UC Berkeley School of Engineering, monitors in the Hoover-Foster neighborhood recorded the lowest at 0.22 micrograms in a single block. The goal is to match that across the whole community.

A local CBO staff member noted that the California Cap-and-Trade program generates more than a billion dollars each year. The AB 617 community emissions reduction program is funded from the Cap-and-Trade program at about \$250 million per year. However, ongoing funding is the biggest concern with AB 617. Despite the agreement by many communities to support the renewal of the Cap-and-Trade program in exchange for AB 617 funding, the governor is attempting to zero out the funding for the Community Air Protection Program that funds local air planning, even though CARB notes this is a successful program and one of the most successful mitigation programs based on return on investment.³²⁸

The *Owning Our Air* plan is certified by the Air District, CARB, and the state. WO was the first because it had many years of air data from multiple monitoring projects.³²⁹ Also, WO was selected as a priority community in the first year of AB 617 passing. The *Owning Our Air* plan was developed in 2019 to address air quality and health issues in the community.³³⁰ Furthermore,

³²⁶ Bay Area Air Quality Management District, *Owning Our Air*, 11.

³²⁷ City of Oakland, "Environmental Justice Element: Public Review Draft," March 21, 2023, 3–4, https://cao-94612.s3.amazonaws.com/documents/EJ-Element_032123-public-review-draft_reduced.pdf.

³²⁸ Beveridge, interview by Shishir Mathur, June 30 and July 7, 2025.

³²⁹ Beveridge, interview by Shishir Mathur, June 30 and July 7, 2025.

³³⁰ Bay Area Air Quality Management District and West Oakland Environmental Indicators Project, *Owning Our Air: The West Oakland Community Action Plan*, September 2019, <https://www.baaqmd.gov/community-health/community-health-protection-program/west-oakland-community-action-plan>.

CARB has provided many of the strategies identified in the *Owning Our Air* plan (as discussed under Local Tools) to help regulate and reduce the sources of air pollution in WO.³³¹

The CBO staff further noted that the only "caps" on emissions are embodied in regulatory permits. There is no process to aggregate total permitted emissions to understand residents' cumulative exposure better. WO's attempt to monitor and reduce air pollution across the community is the first step to understanding cumulative risk. Finally, earlier policies were more macro, focused on mitigating climate change. But there has been a significant shift. Now they are hyper-local, which is one way to address systemic racism.³³² The CBO staff further notes, systemic approaches, like regional air management plan, represent racism because of land use and banking policies (consider historic redlining by the federal government). These wide area policies approach solutions as if we are all equal in our exposure and our benefit from industrialization. Some communities house the sources of pollution. The CBO staff further noted that hyperlocal data allows differentiation between source, experience and effect of pollution. The narrower we can define the impact of pollution and the more specific we can be about who is affected, the more we can target mitigation. The more we can isolate who is affected by industry, the more we can balance the impact of economic benefits that we tend to assume accrue to all communities.³³³

Local tools to mitigate ground pollution

The City of Oakland works with the Alameda Countywide Clean Water Program to monitor water quality in the county and the San Francisco Bay. In an effort to prevent contamination, they monitor industrial/commercial facilities, new construction, and municipal maintenance.³³⁴ The Green Stormwater Infrastructure Plan was developed in 2019 to support the Alameda Countywide Clean Water Program to protect Oakland's watersheds.

Furthermore, the Oakland Environmental Justice (EJ) Element has goals to facilitate outreach, assistance, and incentives to communities, including businesses, impacted by groundwater pollution. The City also has goals to identify sites that are or may be contaminated areas, repair riparian corridors and wetlands, and manage stormwater runoff as preventative and restorative measures.³³⁵ Finally, the City notes that they will continue to work with water providers to prevent further groundwater contamination.³³⁶

³³¹ Bay Area Air Quality Management District, *Owning Our Air*, 9.

³³² Beveridge, interview by Shishir Mathur, June 30 and July 7, 2025.

³³³ Beveridge, interview by Shishir Mathur, June 30 and July 7, 2025.

³³⁴ City of Oakland, "Environmental Justice Element: Public Review Draft," March 21, 2023, 3–10, https://cao-94612.s3.amazonaws.com/documents/EJ-Element_032123-public-review-draft_reduced.pdf.

³³⁵ City of Oakland, "Environmental Justice Element," 3–10.

³³⁶ Bay Area Air Quality Management District, *Owning Our Air*, 3–12.

Finally, the San Francisco Bay Regional Water Quality Control Board (SWBRWQCB) has a Site Cleanup Program (SCP) for sites not federally owned to be cleaned or investigated if there is illegal contamination of groundwater or soil. The Water Board is given the authority to issue cleanup and abatement of discharge in waters under Water Code Section 13304.³³⁷

Site-level groundwater and soil contamination mitigation is the responsibility of developers. Developers can work with any of the following three agencies for groundwater and soil issues: the Regional Water Board, the DTSC, or the Alameda County Environmental Health Department. Developers choose to work with the agency that is likely to be most beneficial to them, and DTSC is the gold standard. The Water Board's main priority is that the contaminated groundwater does not seep into creeks or the Bay. Most recent housing project developers have chosen to work with the County, which was traditionally short-staffed but has since improved.³³⁸

Despite these efforts, a local CBP staff member notes that groundwater contamination remains a significant issue in WO. Groundwater and soil mitigation have been needed across WO. Recently, soil gas venting was adopted for new housing construction, but it simply vents toxins into the lower atmosphere, potentially creating toxic air bubbles. Furthermore, the City has made no apparent progress in upgrading sanitary sewer mains or stormwater management systems. Overall, soil and groundwater contamination are legacy problems in WO with few real solutions.³³⁹

Local tools to mitigate lead exposure

The Environmental Justice Element of the General Plan proposes a goal to address lead exposure among Oakland residents by continuing work with the Joint Lead Hazard Abatement Program and the Alameda County Public Health Department (ACPHD) to improve current strategies, such as screening homes and requiring childcare locations and schools to have lead-safe certifications. Additionally, they want to focus on abatement, lead testing, and outreach to those living in areas with a high risk of lead exposure.³⁴⁰

At the county level, the Alameda County Public Health Department is responsible for the public health of WO residents and is to provide more asthma management programs. They also collaborate with other agencies to develop green building strategies.³⁴¹

³³⁷ San Francisco Bay Regional Water Quality Control Board, "Site Cleanup Program," California Water Boards, accessed March 1, 2025,

https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/sitecleanupprogram.html.

³³⁸ Beveridge, (interview by Shishir Mathur, June 30 and July 7, 2025).

³³⁹ Beveridge, (interview by Shishir Mathur, June 30 and July 7, 2025).

³⁴⁰ City of Oakland, "Environmental Justice Element: Public Review Draft," March 21, 2023, 4–8, https://cao-94612.s3.amazonaws.com/documents/EJ-Element_032123-public-review-draft_reduced.pdf.

³⁴¹ Bay Area Air Quality Management District, *Owning Our Air*, 10.

Tables 4.4, 4.5, and 4.6 note the presence of PDA-, city-, regional-, state-, and federal-level tools to mitigate various environmental disadvantages.

Table 4.4 WO: Strategies to Mitigate Groundwater Pollution

Literature	Used/noted in local, regional, state, and federal plans; and interviews				
	PDA	City	Regional	State	Federal
Proper landfill design.					
Laws and penalties to prevent contamination.			NPDES: requires permit for wastewater discharge—managed by SFBRWQCB); and SFBRWQCB’s SCP.	SWB’s GAMA	NPDES: requires permit for wastewater discharge.
Identify and isolate contaminated zones.		City works with water providers to identify contaminated areas.	ABAG/MTC Plan Bay Area EN1: protect communities from sea-level rise; and SFBRWQCB’s SCP.		
Prevent soil erosion.		EJ Element of the GP.			
Reduce sediment-containing surface runoff.		EJ Element of the GP.			
Monitoring and inspection of polluting sources (e.g., septic, fuel, and chemical tanks).		Alameda County Clean Water Program: City and county joint monitoring, and policies in the EJ Element of the GP.	Alameda County Clean Water Program; NPDES: quality and monitoring requirements—managed by SFBRWQCB; and SFBRWQCB’s SCP.	SWB’s GAMA	NPDES: quality and monitoring requirements.
Control uses in the aquifer recharge areas.		Green Stormwater Infrastructure Plan.			
Educational campaigns.		Policies in the EJ Element of the GP.			

Table 4.5 WO: Strategies to Mitigate Children’s Exposure to Lead

Literature	Used/noted in local, regional, and state plans; and interviews			
	PDA	City	Regional	State
Strong lead poisoning prevention programs—universal screening and public education.		Joint Lead Hazard Abatement Program and ACPHD partnership: screening homes, require childcare centers and schools to be lead-free certified, and outreach to those in high-risk areas.		Childhood Lead Poisoning Prevention Acts; Residential Lead-Based Paint Hazard Reduction Act; and State civil and health codes: buildings with lead hazards are in violation of State housing laws.
Identify and eliminate sources of lead contamination (e.g., paint and water pipes).		EJ Element of the GP: goals to proactively mitigate residents’ lead exposure; and Joint Lead Hazard Abatement Program and ACPHD partnership: testing and abatement.		Childhood Lead Poisoning Prevention Acts.
Remove structural racism: job creation, small business development, affordable housing, and improved social cohesion.	See tools under Socio-economic dimension.			

Table 4.6 WO: Strategies to Mitigate Air Pollution

Literature	Used/noted in local, regional, state, and federal plans; and interviews				
	PDA	City	Regional	State	Federal
Legislation (e.g., US Clean Air Act), emission taxes, and policies and programs.			ACPHD: Asthma management program; and ABAG/MTC Plan Bay Area EN3: invest in parks, trails, and recreational facilities.	AB 617; SB 535; and CARB policies to regulate and reduce air pollution.	Clean Air Act: (major sources, area sources, mobile sources, indoor), and EPA programs
Economic tools and incentives: subsidies for pollution abatement; and emissions trading, banking, and caps.			ABAG/MTC Plan Bay Area EN6: invest in parks, trails, and recreational facilities EN2: assistance/incentives for building retrofitting towards higher seismic, water, energy, and wildfire standards.	CARB's Cap-and-Trade Program; CARB-Funding Guidelines; and AB 1550.	Congestion Mitigation and Air Quality Funds; and Climate Pollution Reduction Grants .
Enhanced air pollution monitoring and modeling.	Owning our Air: West Oakland Community Action Plan: increased monitoring of industrial activities; and WOEIP and BAAQMD monitor air pollution.		WOEIP and BAAQMD monitor air pollution.	CARB policies AB 398.	EPA Ambient Air Monitoring.
Road-side vegetation, and greening.		City of Oakland EJ Element: Policies for			

Literature	Used/noted in local, regional, state, and federal plans; and interviews				
		urban greening and buffering.			
Reduce emissions by transport sector: promote electrification and EVs, dissuade auto use, promote non-auto use, and higher emissions and fuel standards.	Owning our Air: West Oakland Community Action Plan: improve transit; goals to reduce diesel particulate matter and PM2.5.		ABAG/MTC Plan Bay Area EN6: invest in parks, trails, and recreational facilities.	CARB policies; State laws, such as SB 535, AB 617; AB 398; REAP; and AB 1358.	Congestion Mitigation and Air Quality Funds; and Clean Air Act.
Reduce emissions by energy sector: clean and renewable energy sources, cleaner industrial production, higher emission standards, monitoring of air pollution by industries, and elimination/relocation of polluting industries.	Owning our Air: West Oakland Community Action Plan: relocate polluting industries, zero-emissions port by 2035, and replace diesel trucks with cleaner alternatives.		ACPHD and other agencies: green building strategies.	CARB policies; and State laws, such as SB 535, and AB 617.	Clean Air Act.

4.6 Transportation Dimension (sub-dimensions TR1, TR2, TR3, TR4, and TR5)

4.6.1 Summary of disadvantages

Mathur and Ferrell (2024) identified WO as disadvantaged at the household mobility level (TR1) and local accessibility (TR4). Only some of WO was identified as disadvantaged on the remaining sub-dimensions (TR2, TR3, and TR5).³⁴²

4.6.2 Impacts

Local data reinforces many of the Mathur and Ferrell (2024) findings regarding the impacts of transportation disadvantages noted in Chapter 2.1 and highlights pedestrian/bike safety issues.³⁴³ As per the Walk Score data, WO scores 42 out of a possible score of 100, which makes the community car-dependent. However, 32% of WO households do not own a car,³⁴⁴ indicating a high level of non-auto dependency. Indeed, WO residents walk 150 minutes more per week compared to other communities in Oakland, but they have the worst sidewalks and second-highest rate of pedestrian injuries.³⁴⁵ The City of Oakland acknowledges WO as a community that has one of the worst walking conditions and high rates of pedestrian collisions in Oakland.³⁴⁶ Between 2008 and 2014, the City identified 60 intersections and corridors in Oakland with high levels of pedestrian injuries; of those, nine were in WO.³⁴⁷ Finally, WO is bordered on all sides by interstates (880, 580, and 980). Residents near I-880 and I-980 have voiced their concerns over bicycle and pedestrian safety near the interstates.³⁴⁸

With a transit score of 61³⁴⁹ due to a BART station located inside it, WO has overall good transit availability. However, access to BART is offset by poor neighborhood transit accessibility to the station and a lack of jobs fit for residents to work in the high-wage, downtown San Francisco to which it has good transit access. Moreover, a new BART transit village is coming to WO, called the Mandela Station, which will be built adjacent to the existing WO BART Station. It is planned to contain 760 residential units, 300,000 sq. ft. of office and life science research space,

³⁴² Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

³⁴³ Mathur and Christopher Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

³⁴⁴ City of Oakland, *Let's Bike Oakland: Oakland Pedestrian Plan 2017 Update* (Oakland: City of Oakland, 2018), 44, <https://cao-94612.s3.amazonaws.com/documents/Ped-Plan-2017-rev-mar2018-edited-HIN.pdf>.

³⁴⁵ City of Oakland, *Let's Bike Oakland*, 44.

³⁴⁶ City of Oakland, *Let's Bike Oakland*, 17.

³⁴⁷ City of Oakland, *Let's Bike Oakland*, 17–18.

³⁴⁸ City of Oakland, "Environmental Justice Element: Public Review Draft," March 21, 2023, 1-11, https://cao-94612.s3.amazonaws.com/documents/EJ-Element_032123-public-review-draft_reduced.pdf.

³⁴⁹ Walkscore.com, "1724, Mandela Parkway, Oak Center, Oakland, 94607," accessed December 16, 2025, <https://www.walkscore.com/score/1724-mandela-pkwy-oakland-ca-94607>.

53,000 sq. ft. of ground-floor retail, and a parking garage with 400 parking spaces.³⁵⁰ 100 units have already been built and are available to lease.³⁵¹

4.6.3 Local tools to mitigate transportation-related disadvantage

Some strategies are being used at the local level to enhance pedestrian and bike safety and local accessibility. For example, Oakland's Environmental Justice Plan includes transportation goals that are specific to high-needs communities, such as WO, as well as city-wide goals. The plan includes the following goals:

1. Accessible Neighborhoods: To work towards neighborhoods that are within safe walking and biking distance of activities/amenities and encourage transit providers to establish routes close to amenities that support residents.³⁵²
2. Street Design for Safe Speeds: To lower driving speeds, enforce speed limits, provide pedestrian scale lighting, provide leading pedestrian intervals at crosswalks, prioritize communities that have high rates of pedestrian and bicycle crashes, and make efforts to reduce racial profiling in enforcement.³⁵³
3. Collaborative Safety Solutions: Partner with schools, senior centers, community organizations, members of the community, and other stakeholders to encourage active transportation modes and to improve safety.³⁵⁴

Furthermore, the City of Oakland and Caltrans have partnered on a study called Vision 980. The purpose of the study is to reconnect Downtown Oakland and WO neighborhoods that are split along the I-980 corridor. Vision 980 will unfold in two phases: the first is to develop a shared vision among stakeholders, and the second is to create a plan.³⁵⁵

The West Oakland Universal Basic Mobility Pilot provides qualified residents with prepaid debit cards and Clipper Cards for transit, shared mobility, and other mobility services. Up to one thousand WO residents received a maximum of \$320 each. This program was funded through an Alameda County Transportation Commission grant. Eligibility was based on the household

³⁵⁰ "About," *Mandela Station*, accessed October 14, 2024, <https://mandelastation.com/about/>

³⁵¹ Mandela Station, "The Future: Opportunity," accessed October 9, 2024, <https://mandelastation.com/the-future/#opportunity>.

³⁵² City of Oakland, "Environmental Justice Element: Public Review Draft," March 21, 2023, 7–13, https://cao-94612.s3.amazonaws.com/documents/EJ-Element_032123-public-review-draft_reduced.pdf.

³⁵³ City of Oakland, "Environmental Justice Element," 7–13.

³⁵⁴ City of Oakland, "Environmental Justice Element," 7–13.

³⁵⁵ City of Oakland, "Environmental Justice Element," 7–8.

income of those living or working in WO: \$103,500 for one person and up to \$195,250 for an eight-person household.³⁵⁶

The advocacy group ConnectOakland, founded by Chris Sensenig in 2014, shares the same goal of reconnecting Downtown Oakland and WO through a reimagined I-980 transit-oriented corridor. The vision for ConnectOakland is to reestablish 12 city streets between WO and downtown, improve pedestrian connectivity, and reduce the distance between parcels from 560 feet to approximately 132 feet.³⁵⁷ ConnectOakland was created to be a community-led advocacy group. This intention was met, and Mr. Sensenig is no longer actively involved in the project. Mr. Sensenig shared that in 2016, Mayor Schaff brought together housing advocates, Federal Highway Administration (FHWA), and members of Oakland DOT when U.S. Transportation Secretary Castro was visiting the city in an effort to move the plan forward. However, with the incoming Trump Administration, the project paused due to a lack of federal support. As of June 2025, the project is in the first phase, and a second round of community meetings was held. Consultants WSP and Arup are involved, and there are three potential alternatives for the project: making minor improvements, a freeway cap which would put open space over the freeway, and rebuilding the freeway as a boulevard. Mr. Sensenig said he was not in favor of the freeway cap because the freeway would remain and make it virtually impossible to remove in the future.³⁵⁸

Another project, the West Oakland Link, is a 1.1 mile-long, elevated bicycle and pedestrian path that would connect Mandela Parkway and the San Francisco-Oakland Bay Bridge East span. The funding source for this project includes the Bay Area Toll Authority, Alameda County Transportation Commission, City of Oakland, and Caltrans. Anticipated to cost \$100 million, the project will be constructed in phases as the state and federal funding is available. This project is in the pre-construction meeting phase.³⁵⁹

A local CBO staff member further elaborated on this project by noting that it is a Caltrans project. About 65% of the design is complete. WOEIP conducted a series of community engagement meetings for this project for 2 years. The meetings also generated ideas for routes and amenities. The project begins at the intersection of W. Grand Ave and Mandela Expwy. So, the City asked

³⁵⁶ City of Oakland. "Universal Basic Mobility Pilot." Accessed May 29, 2025.
<https://www.oaklandca.gov/topics/universal-basic-mobility>.

³⁵⁷ ConnectOakland, "ConnectOakland Vision," accessed May 9, 2025,
<http://www.connectoakland.org/about/vision-2/>.

³⁵⁸ Chris Sensenig (ConnectOakland Founder), interview by Shishir Mathur, June 27, 2025.

³⁵⁹ Metropolitan Transportation Commission, "West Oakland Link," accessed May 29, 2025,
<https://mtc.ca.gov/planning/transportation/bicycle-pedestrian-micromobility/west-oakland-link>.

Caltrans to repave W. Grand Ave as a condition for project buy-in. The community was not involved in this request.³⁶⁰

The staff member also noted that gentrification is a concern in this area. Earlier, this area was occupied by trucks and the unhoused. The truck yard was removed, and housing was built. Shared workspaces and a food court were also developed. There is a weekly farmers' market in the summer. The area now caters to upper-income people. WO was 80% Black in the 1980s (the city was 60%), and 40% in the 1990s. The Latino, Pacific Islander, and Asian populations are growing. Low-income people continue to fall behind and require deeper subsidies to stay in the community.³⁶¹

In 2018, Measure KK passed a \$600 million bond to fund transportation, infrastructure, and affordable housing in Oakland. The City Council ranked projects based on Mayor and City Council input, community feedback, and existing plans and guiding principles. Through this process they developed a Capital Improvement Program that is scored every two years. Oakland's Complete Streets project was among the projects that were scored as a priority.

Oakland is working on 38 complete streets projects with an adopted 2-year budget of more than \$13 million as of August 2023. Several of these complete streets projects impact WO but a few are specific to WO. The WO Industrial Streets project would update streets in WO as recommended in the WOSP. This project has not broken ground yet but it would remove inactive railroad tracks, repave roads, and improve landscaping, street lights, and pedestrian and bicycle infrastructure. The WO Transit Access Improvements is in the design phase and it would improve bus stops, sidewalks, and curb ramp compliance. The West Oakland Community Action Plan (WOCAP) implementation project is in the planning phase, which incorporates WOCAP-identified areas of improvement such as sidewalk and street repair, urban greening, bus improvements, and truck management.³⁶²

Finally, Oakland's Transit Action Strategy Implementation Plan is a partnership between Oakland's Department of Transportation and AC Transit for the city's transit network related improvements. The projects include extending red curbs, painting crosswalks, retiming traffic signals for buses, and larger community plans for transit corridors.³⁶³

³⁶⁰ Beveridge, interview by Shishir Mathur, June 30 and July 7, 2025.

³⁶¹ Beveridge, interview by Shishir Mathur, June 30 and July 7, 2025.

³⁶² City of Oakland, "FY 2023–25 Strategic Priorities," OpenGov, accessed May 30, 2025, <https://stories.opengov.com/oaklandca/published/aPSk1tQj3>.

³⁶³ City of Oakland, "Transit Action Strategy," accessed May 29, 2025, <https://www.oaklandca.gov/topics/transit-action-strategy>.

4.6.4 Regional-level tools to mitigate transportation disadvantage

Apart from the regional-level tools noted in Chapter 3.4.3.1, given that a BART station is located inside WO, BART's Transit-Oriented Development (TOD) Policy and Station Access Policy are relevant for WO. The former was adopted in June 2016 and consists of six goals that impact the region.

1. Create mixed-use and mixed-income places through partnerships.
2. Help meet regional land use and transportation goals of reducing GHG and contributing to economic growth and quality of life for residents.
3. Increase BART ridership, with an emphasis on areas and times that have capacity to expand.
4. Increase BART's financial gains by capturing the value of transit and reinvesting in TOD goals.
5. Incentivize non-automotive transportation on and near BART properties through land use and urban design choices.
6. Support housing affordability.³⁶⁴

The policy outlines strategies to meet these goals through managing resources to support TOD with the proposal of a 4-Year Work Plan, working with local jurisdictions on the development of station area and land use plans that encourage TOD-related uses, investing in value capture and land acquisition, partnering with various stakeholders towards TOD planning and strategizing for mixed-use development and transportation demand management, conducting financial evaluations of TOD benefits, using varied financial tools and governances to maximize TOD goals, increasing development near BART stations to address housing needs, forming state and regional partnerships to prevent homelessness, implementing BART's Affordable Housing Policy to have 35% affordable housing, and including BART's affordable housing goals in the 4-Year Work Plan.³⁶⁵

In June 2019, BART adopted the BART Station Access Policy to improve rider safety, comfort, access, and affordability with six goals:

³⁶⁴ San Francisco Bay Area Rapid Transit District, Transit-Oriented Development Policy, adopted June 9, 2016, amended April 23, 2020, 1, https://www.bart.gov/sites/default/files/docs/BART%20Transit-Oriented%20Development%20Policy_Amended2020-04-23.pdf.

³⁶⁵ San Francisco Bay Area Rapid Transit District, Transit-Oriented Development Policy, adopted June 9, 2016, amended April 23, 2020, 1–3, https://www.bart.gov/sites/default/files/docs/BART%20Transit-Oriented%20Development%20Policy_Amended2020-04-23.pdf.

1. Support regional public safety and pollution goals, provide safe access to BART for all users, invest in active transportation, prioritize sustainability, and increase multi-modal access by reducing auto access at stations.
2. Increase ridership by increasing station access and management of crowding.
3. Manage investments, capital, and operation budgets, and consider land value in decision-making that increases ridership.
4. Improve customer experience and neighbor experience at BART station locations, promote TOD in and around BART properties, collaborate with local stakeholders on BART improvements, and consider design impacts on the environment.
5. Provide equitable service to riders, with an emphasis on disadvantaged communities, reduce the cost of living in disadvantaged communities by improving access and affordable housing options, and use universal design principles to improve safety and access for riders.
6. Be innovative and collaborate with stakeholders, including technology companies, to best meet the needs of riders.³⁶⁶

Tables 4.7, 4.8, and 4.9 note the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various transportation disadvantages.

³⁶⁶ San Francisco Bay Area Rapid Transit District, BART Station Access Policy, adopted June 9, 2016, https://www.bart.gov/sites/default/files/docs/BART%20Access%20Policy%20-%20Adopted%202016-06-09%20Final%20Adopted_0.pdf.

Table 4.7 WO: Strategies to Enhance Local Accessibility (Sub-Dimensions TR1 to TR3)

Literature	Used/noted in local, regional, state, and federal plans; and interviews				
	PDA	City	Regional	State	Federal
Investments in transit.		Transit Action Strategy; ConnectOakland Vision ; and Complete Streets Capital Program.	Following ABAG/MTC's transit strategies: T1, T2, and T10. BART TOD Plans/ Strategies.	TDA; Transit Action Strategy; Free Fares for School; and Safe Routes to School.	
Investments in walk/bike infrastructure.	West Oakland Link Project/Resolution 4672.	Following City of Oakland's EJ Element's goals: accessible neighborhoods and collaborative safety solutions. ConnectOakland Vision; Complete Streets WO Industrial Streets project; and Complete Streets Capital Program.	Following ABAG/MTC's transit strategies: T2 and T7. MTC Resolution 4505; BART TOD Plans/ Strategies; and West Oakland Link.	Safe Routes to School; ATP Clean Mobility Options for Disadvantaged Communities; and California Complete Streets Act of 2008.	FTA TOD Program; and CMAQ.

Table 4.8 WO: Strategies to Promote Overall Local/Neighborhood Accessibility
(Sub-Dimension TR4)

Literature	Used/noted in local, regional, state, and federal plans; and interviews				
	PDA	City	Regional	State	Federal
Traffic calming and other TDM measures.	BART WO Mandela Station development .	City of Oakland's EJ Element's goal: Street Design for Safe Speeds; Vision 980 Study/Connect Oakland Vision; and Complete Streets Capital Program.	Following ABAG's transit strategies: T8 and T9; BART TOD Plans/ Strategies; and BART Station Access Plans/Policies.	Safe Routes to School.	Congestion Mitigation and Air Quality Funds; MAP-21; and Safe Streets for All (SS4A).
Tools to increase density and land use diversity, such as compact, mixed-use infill TODs.	WO Mandela Station development.	ABAG's tools and policies to encourage development in PDAs and Transit-Rich PDAs: T2, H3, H8, and EC4.	ABAG's tools and policies to encourage development in PDAs and Transit-Rich PDAs.	California HCD TOD Housing Program: build homes near transit; California HCD Infill Infrastructure Grant Program; AHSC; and SB79, AB1244, SB358.	FTA TOD.

Table 4.9 WO: Strategies to Promote Regional Accessibility (Sub-Dimension TR5)

Literature	Used/noted in local, regional, state, and federal plans; and interviews				
	PDA	City	Regional	State	Federal
Regional land use planning.			Plan Bay Area overall and ABAG's transit strategies, specifically T1 and T10. BART TOD Plans/ Strategies.	AB32; SB 375; Density Bonus Law; and Housing Accountability Act.	
Corridor planning.		ConnectOakland Vision.	BART TOD Plans/ Strategies.	AB 2011; Proposition 1B (2006)/Corridor System Management Plans; and Corridor Mobility Improvement Account.	
Job/housing balance & match.	BART WO Mandela Station development.	Development of affordable housing throughout the city.	ABAG RHNA requires 441,176 new housing units from 2023–2031.	RHNA numbers determined by CA Dept of Housing and Community Development; CA HCD Jobs-Housing Balance Incentive Grants; Inter-Regional Partnership program; and CA Govt Code: Section 65890.1, Section 65890.3, Section 65890.5, and Assembly Bill 2864.	
Provision of affordable housing.	BART WO Mandela Station development.	Development of affordable housing throughout the city.	ABAG's housing strategies, and BART TOD Plans/Strategies.	AHSC; Community Housing Development Organizations;	LIHTC; CDGB; HOME; and Vouchers

Literature	Used/noted in local, regional, state, and federal plans; and interviews				
		WOSP – Impact fees, ROOT program, OakCLT, and developer incentives for affordable housing, and MTW.		Permanent Local Housing Allocation Program Non-Entitlement Local Government grant to fund California to assist homeless individuals; REAP; CalHFA Programs, tax credit program, and affordable housing legislation (see table under economic dimension); SB 375; and Density Bonus Law.	
Diverse employment options within DACs.	There are several WO job training and job placement programs: CJP, WOJRC, Mandela, etc. WO Mandela Station development.	Training low-income small businesses and construction contractors.	EC2.	High Road Workforce System.	
Transit accessibility to diverse employment options outside DACs.	Universal Basic Mobility Pilot; WO Mandela Station development.	ConnectOakland Vision.	Following ABAG's transit strategies: T1, T2, and T10.		

4.7 Case Study Analysis

4.7.1 Socio-economic dimension

WO demonstrates high levels of disadvantage under the demographic sub-dimensions of concentration of racial minorities and concentration of single-parent households, and under the economic sub-dimension of concentration of poverty.

WO is a traditionally redlined Black community bound by freeways on all sides. In the recent past, the Latino population has increased, and the Black population has decreased. While the local city and PDA-level plans call for the development of affordable housing, progress has been mixed. An affordable housing impact fee is currently in place, and a TOD near the WO Bart station is planned to include affordable housing units. The City of Oakland spends one-quarter of its property tax revenues on affordable housing. It has strong tenant protection laws (including a rent stabilization ordinance), although their enforcement needs to be stronger. However, the City of Oakland does not have much ongoing funding to develop affordable housing. Furthermore, given that it is a DAC, not a HRA, WO is at a disadvantage while competing for federal and state funds that are now geared more towards funding affordable housing in HRAs.

Furthermore, while the city and WO have several jobs and other employment and economic development programs, more such programs are needed. Some notable programs include OHA's FSS program, digital literacy program at Learning Labs, WOJRC, Cypress Mandela Training Center, and programs through Mandela Partners.

Overall, the efforts to mitigate socio-economic disadvantage are modest at best.

4.7.2 Educational dimension

WO has a high level of disadvantage on ED1 (low overall level of education) and ED2 (low-quality K–12 education).

The primary tools to enhance the overall education quality of the community or the quality of K–12 education are workforce-development-related. While several of these tools are available at the PDA, city, and state levels, their implementation in WO seems limited. Many tools are available at the state and federal levels to mitigate WO's K–12 education quality-related disadvantages, but their effectiveness could not be assessed due to the inability to interview school district staff.

4.7.3 Environmental dimension

WO faces severe air and ground pollution and the risk of lead exposure to children.

The pollutants that cause poor air quality in WO are generated from the multiple freeways, industries, the Port of Oakland, public transportation lines, and a post office distribution center. Compared with other parts of Oakland, WO residents are more likely to visit the emergency room for asthma. They also experience higher instances of death from air pollution-related diseases such as heart attacks, heart disease, strokes, cancer, and lower respiratory diseases. Furthermore, these air quality conditions are disproportionately concentrated in WO among people of color and low-income residents due to systemic racism, including the practice of redlining.

Similarly, the Oakland Environmental Justice Element identified significant air quality and water quality concerns in some parts of WO. In a similar vein, proximity to transportation and industrial facilities causes groundwater contamination, and spills and leaks have contributed to it. Furthermore, WO has six highly polluting recycling companies that operate as green industries because they recycle. They have significant impacts on air, water, and soil. Lead exposure is most likely from lead paint in homes built before 1978 and from soil contamination, creating multiple sources of exposure. Over half of homes built before 1978 contain lead-based paint. In Oakland, over 80% of housing was built before 1979. Children in WO have some of the highest levels of lead exposure in the county and the state.

Efforts to mitigate environmental pollution have been moderate for air pollution and minimal for ground pollution and lead exposure. The PDA-level *Owning Our Air: West Oakland Community Action Plan* proposed many strategies to mitigate air pollution, several of which have been implemented. Air pollution has been declining overall, except for a rise in particulate matter in the winter months due to the use of personal fireplaces. At the city level, the City of Oakland's Environmental Justice Element calls for the use of air filters, urban greening, and buffering to mitigate the impacts of air pollution.

Efforts to reduce groundwater pollution and exposure to lead are limited. Surface runoff from the truck yards into stormwater drains is a significant concern, and it is unclear how much impact state and federal laws are having in mitigating ground pollution in WO. The strategy to relocate polluting industries does not seem effective. Similarly, there are city- and county-level plans and state laws to mitigate children's exposure to lead, but their efficacy has not been determined.

In summary, the tools' efficacy in mitigating environmental disadvantage is low to moderate.

4.7.4 Transportation dimension

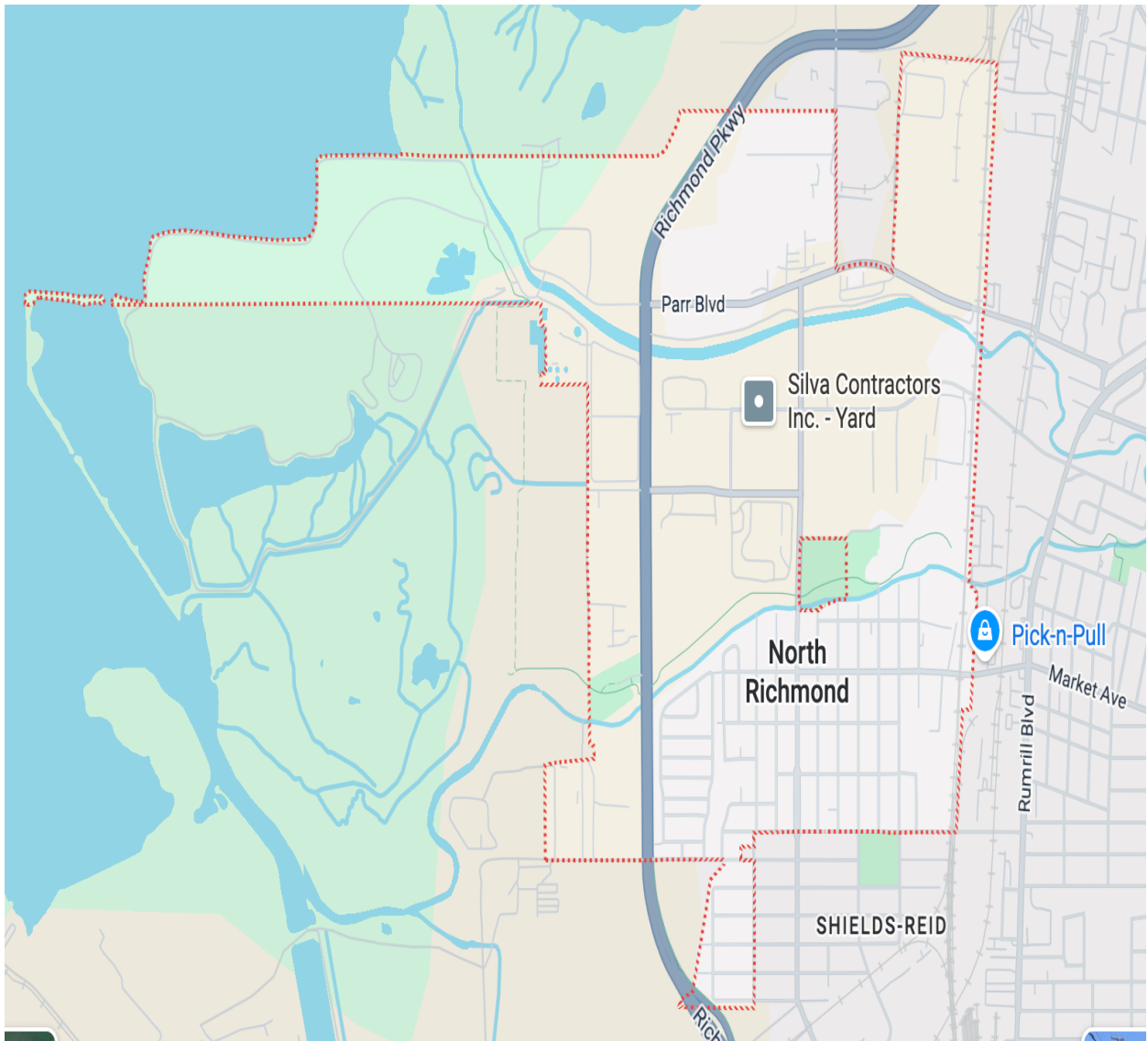
WO has a high level of disadvantage under TR1 (household-level mobility) and overall local accessibility (TR4), and some disadvantage under the other three sub-dimensions: TR2 (ped/bike accessibility), TR3 (local transit accessibility), and TR5 (regional transit accessibility).

WO faces significant bike and pedestrian safety issues, making the community car-dependent for a population where 1/3rd of households do not own a car. Fortunately, the city is aware of these issues. The City of Oakland's EJ Element proposed specific strategies to create walkable neighborhoods, reduce automobile speeds, and partner with a diverse set of stakeholders to increase safety and promote active transportation modes. Efforts are also afoot to improve WO's connectivity with downtown Oakland, where the I-980 freeway is currently a major barrier. Some of the complete street projects are in various design and planning phases. At the regional level, BART has TOD and Station Access policies. However, the impact of these projects and policies on mitigating WO's transportation advantages is unclear.

In summary, the efficacy of the tools to mitigate transportation disadvantage is minimal to low.

5. North Richmond Case Study

Figure 5.1 Map of North Richmond, California³⁶⁷



³⁶⁷ Google Maps, North Richmond, California (screenshot by author, November 18, 2025), <https://www.google.com/maps>.

Figure 5.2 Map of Richmond, California within San Francisco Bay Area³⁶⁸



³⁶⁸ Bay Area Map, PNG image, Wikimedia Commons, accessed December 14, 2025, https://upload.wikimedia.org/wikipedia/commons/b/bc/Bayarea_map.png.

5.1 Overview

North Richmond (NR) is partly in the City of Richmond and partly in unincorporated western Contra Costa County in California. It is near the San Francisco Bay (see Figures 5.1 and 5.2). The City of Richmond experienced a growth in population during World War II, with an influx of people looking for work at the shipyards. Black and minority workers faced housing challenges due to redlining practices in the areas closest to the shipyards, which led many of them to make NR their home. After the war, Richmond retained many of the workers who continued to work in the various industries in the Richmond area.³⁶⁹

The total population of NR is 4,175.³⁷⁰ NR is predominantly Hispanic with 67.8% Hispanic or Latino, 16.7% Black, 9.2% Asian, 7.2% white, and 2.8% American Indian and Alaska Native populations.³⁷¹ While the county is minority-majority at 27% Hispanic or Latino, 8.7% Black, 18.7% Asian, 43% white, and 1% American Indian and Alaska Native population.³⁷²

The average life expectancy of a NR resident is lower at 77 years, compared to 81 years for the county. The median household income in NR is also much lower at \$59,312, compared to \$103,997 for the county.³⁷³

Housing in NR is among the most affordable in the San Francisco Bay Area; however, the housing stock is aging. NR's proximity to jobs and industries, as well as its housing affordability, puts it at risk of gentrification. Many of the current residents are renters and likely would be displaced by gentrification.³⁷⁴

NR's housing affordability could be partly attributed to its varied disadvantages. A locally unwanted land use area (LULU), it has been used as a place to locate industries, dumps, and sewage plants. NR being partly in the unincorporated county has contributed to it being a LULU area.³⁷⁵ Heavy industries in NR, such as the Chevron Richmond Refinery, puts the health of residents at risk.³⁷⁶ Moreover, NR's proximity to the Bayshore and Wildcat Creek puts it at risk of

³⁶⁹ Envision Contra Costa. *North Richmond Draft 6–22–2020*. Contra Costa County, August 2020, 1 https://envisioncontracosta2040.org/wp-content/uploads/2020/08/North_Richmond_Draft_6-22-2020.pdf.

³⁷⁰ "North Richmond, California – Demographics: Race," *Census Dots*, accessed November 23, 2025, <https://www.censusdots.com/race/north-richmond-ca-demographics>.

³⁷¹ U.S. Census Bureau, "North Richmond CDP, California," *data.census.gov*, accessed March 13, 2025, https://data.census.gov/profile/North_Richmond_CDP,_California?g=160XX00US0652162#race-and-ethnicity.

³⁷² U.S. Census Bureau, "Contra Costa County, California," *data.census.gov*, accessed March 15, 2025, https://data.census.gov/profile/Contra_Costa_County,_California?g=050XX00US06013#race-and-ethnicity.

³⁷³ Contra Costa County, *Contra Costa County 2045 General Plan: Draft* (October 2023), 153, <https://envisioncontracosta2040.org/wp-content/uploads/2024/08/Full-GP-with-comments.pdf>.

³⁷⁴ Contra Costa County, *Contra Costa County 2045 General Plan*, 153.

³⁷⁵ "North Richmond," Greenbelt Alliance, accessed November 11, 2024, <https://www.greenbelt.org/hotspots/north-richmond/>.

³⁷⁶ Contra Costa County, *Contra Costa County 2045 General Plan*, 153.

flooding from sea level rise. Finally, it suffers from heavy-industrial-activities-led soil contamination.³⁷⁷

5.2 Summary of Disadvantages

Mathur and Ferrell (2024) found that NR had high levels of disadvantages in approximately half of the sub-dimensions under the Demographic, Economic, and Transportation dimensions. NR was disadvantaged in all sub-dimensions under the Educational dimension and in a third of subdimensions under the Environmental dimension.³⁷⁸

5.3 Socio-economic Dimension (sub-dimensions DE1 and DE2 of the demographic dimension and EC1 and EC2 of the economics dimension)

5.3.1 Demographics (sub-dimensions DE1 and DE2)

Summary of disadvantages

Under the Demographic dimension, NR was distressed under DE1 (concentration of racial minorities) and not under DE2 (concentration of single-parent households).

The minority concentration has historical roots. NR was a rural area prior to World War II. The war brought workers, many of them Black, to the Kaiser Shipyards. These workers resided in NR and other unincorporated areas near Richmond due to segregation. Living conditions were overcrowded and poor. NR was near a dump and lacked adequate lighting, drainage, paved roads, and did not have police and fire services. Other ethnicities that resided in NR left as Black residents came to NR. For much of NR's history, its planning was neglected.³⁷⁹

NR has vulnerable populations across all Block Groups. Over 80% of NR residents are renters; over 80% are people of color; the proportion of residents without a bachelor's degree in NR is higher than the city average of 68.6%; and NR has a larger proportion of low-income households than the city average. Some areas of NR are showing signs of gentrification, with an increase in property values and rents and displacement of low-income minority residents with wealthier white residents.³⁸⁰

³⁷⁷ "North Richmond," Greenbelt Alliance.

³⁷⁸ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

³⁷⁹ Robert Rogers, "Part 2: North Richmond's Inauspicious Beginnings," *Richmond Confidential*, June 8, 2011, accessed March 19, 2025, <https://richmondconfidential.org/2011/06/08/part-2-north-richmonds-inauspicious-beginnings/>.

³⁸⁰ "Belonging and Community Health: Richmond," *The Othering & Belonging Institute*, last modified February 23, 2021, accessed March 18, 2025, <https://belonging.berkeley.edu/belonging-and-community-health-richmond>.

Under California Senate Bill 1000, NR has been identified as a disadvantaged community. This is determined by the ranking indicators that are at the 72nd percentile or higher of most impacted census tracts relative to the state. The designation of disadvantage was across 21 indicators, including some demographic indicators. In 2021, on the Impacted Communities Indicators, NR was in the 94th percentile in Limited English-Speaking Households, when ranked by census tracts compared to the state.³⁸¹

5.3.2 Economics (sub-dimensions EC1 and EC2)

Summary of disadvantages

According to Mathur and Ferrell (2024), EC1 (housing affordability) was not a concern for NR, but EC2 (poverty concentration) was.³⁸²

Indeed, in 2020, the median household income in NR was \$50,313, which was much lower than \$88,456 for Contra Costa County.³⁸³ In 2023, the median household income in NR increased to \$59,312 while it increased to \$103,997 for the county.³⁸⁴ The percentage increase is similar between NR and the county but the gap in dollar amount has increased.

Furthermore, as noted previously, NR has been identified as an Impacted Community under Senate Bill 1000. On the 2021 Impacted Community Indicators, NR was in the 82nd percentile in Housing Burdened Low-Income Households and 76th percentile in Poverty.³⁸⁵

5.3.3 Local tools to mitigate socio-economic disadvantage

The North Richmond Resident Leadership Team (NR RLT) is a group of local NR residents, most of whom are people of color, who advocate for the community of NR.³⁸⁶ In 2019, the NR RLT, through extensive community outreach, created the NR QOL Plan. This plan was developed as a response to the Housing Authority of the County of Contra Costa wanting to redevelop Las Deltas, an affordable housing project with a 11.38-acre main campus and scattered below market rate and market rate housing sites in NR. NR residents were concerned that the redevelopment of Las Deltas would lead to gentrification and the displacement of current residents.³⁸⁷ The residents'

³⁸¹ Contra Costa County, *Contra Costa County 2045 General Plan: Draft* (October 2023), 155, <https://envisioncontracosta2040.org/wp-content/uploads/2024/08/Full-GP-with-comments.pdf>.

³⁸² Mathur and Ferrell, *Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?*

³⁸³ Envision Contra Costa. *North Richmond Draft 6–22–2020*, 3.

³⁸⁴ Contra Costa County, *Contra Costa County 2045 General Plan: Draft* (October 2023), <https://envisioncontracosta2040.org/wp-content/uploads/2024/08/Full-GP-with-comments.pdf>, 153.

³⁸⁵ Contra Costa County, *Contra Costa County 2045 General Plan*, 155.

³⁸⁶ Contra Costa Health Services, *North Richmond Quality of Life Plan* (March 2020), <https://healthycontracosta.org/wp-content/uploads/2020/03/QoL-digital-english.pdf>, 7.

³⁸⁷ Contra Costa Health Services, *North Richmond Quality of Life Plan*, 3.

vision as expressed in the NR QOL Plan is to have mixed-use residential and commercial spaces, prioritizing affordable housing, offering employment opportunities for residents, providing community programs that support those who are homeless, programs and services for young as well as elderly people, educational and vocational training, and upgrades to infrastructure.³⁸⁸

Three hundred of the existing Las Deltas housing units were part of the Housing Authority, and the Housing Authority was permitted to sell them when the Housing Authority was unable to maintain them. The Richmond Community Foundation (RCF) and some other non-profits have acquired some of these units. There is a bid out to redevelop 200 apartments on the main Las Deltas site, and they are currently interviewing developers. For the Las Deltas properties, there are stipulations on who can purchase them, with former Las Deltas residents being the first choice, followed by NR residents, and so on.

Furthermore, this plan addresses the economic needs of the community in the Business Opportunities section. The plan notes that there is a misconception that NR is not a safe place for business and that residents are too poor to support businesses. The NR RLT advocates for more local businesses that will meet the needs of residents.³⁸⁹ They suggest cooperative business development for those interested in worker-owned businesses and small business development. They further note that the large businesses in NR should provide community benefits, workforce training, employment opportunities, and financial literacy programs to residents, and should also invest in placemaking in NR.³⁹⁰ In the Youth and Education section of priorities, they advocate for workforce training and opportunities for NR youth.³⁹¹ Their approach to achieving their priorities is community-driven collaboration and advocacy.

Moreover, Verde School has a community center and the Shields-Reid Center has youth-related activities to benefit families in the neighborhood. In the North Richmond Community Resource Center, the Community Housing Development Corporation (CHDC) runs an after-school program. It provides job training, job fairs, and a program called “Boss Up” to teach youth about learning business and entrepreneurship skills.³⁹²

At the county level, the Contra Costa County 2045 General Plan included the priorities of the NR RLT Quality Life Plan as part of their guidance section. The General Plan outlines 13 action items for NR, of which two action items—1 and 13—are relevant to economic distress. Specifically, action item one is to build a new community center that would provide NR residents, including

³⁸⁸ Contra Costa Health Services, *North Richmond Quality of Life Plan*, 15.

³⁸⁹ Contra Costa Health Services, *Quality of Life in Contra Costa County: A Community Needs Assessment* (March 2020), <https://healthycontracosta.org/wp-content/uploads/2020/03/QoL-digital-english.pdf>, 22.

³⁹⁰ Contra Costa Health Services, *Quality of Life in Contra Costa County*, 22–23.

³⁹¹ Contra Costa Health Services, *Quality of Life in Contra Costa County*, 20.

³⁹² Tania Pulido (District Coordinator for Supervisor John Gioia in District 1) interview by Shishir Mathur, May 30 & June 10, 2025.

youth, with workforce training and opportunities. Action item 13 is to provide opportunities, through outreach and financial assistance, for NR residents to operate small businesses.³⁹³

The Contra Costa County 2045 General Plan has countywide goals for workforce development to bring more employment and business opportunities to the county. The county has a Workforce Development Board through the Employment and Human Services Department with members that are appointed by the County Board of Supervisors. This board includes business owners, educators, advocates, members of community-based organizations, and representatives from public agencies.³⁹⁴ The General Plan outlines several goals to increase job training, affordable childcare, educational programs, and employment opportunities, in what they have identified as Impacted Communities, such as NR.³⁹⁵ Impacted Communities are those that experience the highest levels of pollution, poverty, and housing instability, as identified by Senate Bill 1000.³⁹⁶

Affordable childcare is a significant topic of discussion in NR. A First 5 center is embedded in the Verde School and a daycare is embedded in Las Deltas housing. There is a greater need for more affordable childcare in the community, however.³⁹⁷

The SparkPoint Program in Richmond helps people build assets through first-time homebuyer programs and connect with vetted lenders.³⁹⁸ In addition, CHDC offers down payment assistance programs, which they layer with other state programs to maximize their impact. Additionally, they offer a below-market mortgage interest rate program.³⁹⁹

The Contra Costa County General Plan has a Land Use goal to provide different housing types in a variety of neighborhoods and a policy under that goal to have affordable housing available throughout the county.⁴⁰⁰

Contra Costa County's General Plan's Stronger Communities goal for the equitable distribution of resources to impacted communities, includes an action item for the County to find grant opportunities for community-based programs and other partners, to fund beautification projects in impacted communities throughout the County.⁴⁰¹

³⁹³ Contra Costa County, *Contra Costa County 2045 General Plan*, 160–162.

³⁹⁴ Contra Costa County, *Contra Costa County 2045 General Plan*, 53.

³⁹⁵ Contra Costa County, *Contra Costa County 2045 General Plan*, 56–57.

³⁹⁶ Contra Costa County, *Contra Costa County 2045 General Plan*, 18.

³⁹⁷ Pulido, interview by Shishir Mathur, May 30 and June 10, 2025.

³⁹⁸ Jim Becker (President and CEO, Richmond Community Foundation) interview by Shishir Mathur, June 5, 2025.

³⁹⁹ Don Gilmore (Executive Director, Community Housing Development Corporation) interview by Shishir Mathur, May 30 & June 11, 2025.

⁴⁰⁰ Contra Costa County, *Contra Costa County 2045 General Plan*, 218.

⁴⁰¹ Contra Costa County, *Contra Costa County 2045 General Plan*, 38.

Furthermore, NR has dedicated annual funding through the North Richmond Mitigation Initiative, which is a community agreement benefits package between the City of Richmond, Contra Costa County, and the landfill. Approximately \$1 million a year is allocated to beautification projects and is used to fund staff positions, award mini-grants to non-profits, and fund events like the community clean-ups and Earth Day. On a yearly basis, they conduct numerous clean-ups, and the county has increased its capacity for clean-ups along the creeks and to address illegal dumping. The county's public works department is responsible for sidewalk and road improvement. The City has secured \$8 million to support beautification efforts and a park opened in the fall of 2025 with art and other improvements such as "construction of a new children's play area, bike pump track, stage and performance area, fitness zone, habitat garden, tree shade area throughout the park, and lighting and fencing throughout the park."⁴⁰² In 2024, there was a significant push to improve Wildcat Creek, which borders Verde Elementary and the surrounding homes, presenting numerous efforts to enhance the area's livability.⁴⁰³

The Stronger Communities Element from the Contra Costa County General Plan's Goal SC-3 is for residents to have access to physical and mental health services.⁴⁰⁴ However, NR residents have very limited access to health or mental health services unless they are Kaiser Permanente members. Those who use the county health system and rely on public transit have to take a 3.5-hour one-way ride to Martinez, California. More nearby health facilities include the Lifelong Medical Group⁴⁰⁵ and the North Richmond Center for Health.

There are two access to healthy food goals under the Stronger Communities Element. The first is Goal SC-4: Expand small-scale food production and urban farming to grow and distribute fresh food. SC-4 has the following policies: 4.1: Support home gardens and collaboration between property owners and gleaning/stewardship programs; 4.2: Support new residential developments to have community gardens; 4.3: Support urban farms, shared garden space, and allow for small-scale processing and sales; and 4.4: Support programs that use recycled water for urban farming.⁴⁰⁶ The following are associated actions: Amend County Ordinance Code Title 8 to make clear zoning for urban agriculture, permitting requirements, standards, sustainable practices, sales, animal husbandry, and disposal of agricultural waste.

The second is Goal SC-5: Accessibility to affordable healthy food in impacted communities. SC-5 includes the following policies:

⁴⁰² City of Richmond, "Prop 68 Statewide Park Program—Shields-Reid Park," <https://www.ci.richmond.ca.us/4483/Prop-68-Statewide-Park-Program---Shields>

⁴⁰³ Pulido, interview by Shishir Mathur, May 30 and June 10, 2025.

⁴⁰⁴ Contra Costa County, *Contra Costa County 2045 General Plan*, 44.

⁴⁰⁵ Becker, interview by Shishir Mathur, June 5, 2025.

⁴⁰⁶ Contra Costa County, *Contra Costa County 2045 General Plan*, 45–46.

5.1: Increase access to grocery stores, urban agriculture, farmer’s markets, and the use of vacant land for shared kitchens in impacted communities;

5.2: Prioritize multimodal access in impacted communities to support access to grocery stores, markets, gardens, etc., near transit; and

5.3: Provide temporary if not permanent access to County land for farmers’ markets and gardens for all, but with an emphasis on impacted communities.

The following are the related actions to this goal:

5.1: Map food deserts, transit, and micro mobility in the county;

5.2: Amend permitting for grocery stores in impacted communities;

5.3: Incentivize grocery stores and markets that sell fresh food to establish in impacted communities;

5.4: From 2025 on, every 5 years, review the Alcoholic Beverage Sales Commercial Activities Ordinance to prevent concentrations of bars and liquor stores from establishing in impacted communities; and

5.5: Study the possibility of preventing fast-food restaurants from establishing near areas where children gather, such as schools and parks.⁴⁰⁷

There are several food accessibility initiatives in NR. A food bank comes on a weekly basis at two different sites in the community. Additionally, Urban Tilth (a nonprofit that Richmond Community Foundation (RCF) helped start in 2005) organizes a free food stand in NR every Thursday and a food bank called White Pony Express visits Verde School every week.⁴⁰⁸ RCF also offers a membership that provides a box of produce per week to the member and a complimentary box to another family.⁴⁰⁹

There is also the NR farm on land the county leased for the first two years and then sold to Urban Tilth. This sale allowed Urban Tilth to secure additional funding. The goal is to have a fresh produce store on this farm. Currently, there is a weekly farm stand. The farm also serves as an incubator for job training. It employs 50 staff members, and they hire 40 additional staff members over the summer, many of whom are youth. Students at Verde Elementary School now have

⁴⁰⁷ Contra Costa County, *Contra Costa County 2045 General Plan*, 46–47.

⁴⁰⁸ Pulido, interview by Shishir Mathur, May 30 and June 10, 2025.

⁴⁰⁹ Becker, interview by Shishir Mathur, June 5, 2025.

access to the farm from a recent new agreement. Students otherwise didn't have green or open space at school.⁴¹⁰

NR also has one senior center that provides free meals, activities, and other support to seniors. There is very limited support for those who are homeless in the city or county.⁴¹¹

The City of Richmond does not have a full-service grocery store in the city limits, except for a bulk grocery store called Food Co. In NR there is a liquor store which has been attempting to sell more fresh produce. There have been talks of bringing farmers' markets to NR but none currently exists. CHDC may partner with RCF to work on opening a grocery store in the community.⁴¹²

The Richmond and Chevron partnership formed in 2015 to form eQuip Richmond. Chevron contributed \$10 million to invest in the fence line communities adjacent to the Chevron refinery without a term limit. Funding from eQuip Richmond could go towards the support of the construction of the grocery that the CDHC and Urban Tilth are interested in establishing.⁴¹³

Finally, RCF is working on providing community transit support by building an EV car-sharing hub, which will enable people to rent a car for \$4 per hour through an app on their smart phones. This would enable people to go to El Cerrito, San Pablo, or Richmond's Food Co., increasing food access.⁴¹⁴

Table 5.1 notes the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various socio-economic disadvantages.

⁴¹⁰ Pulido, interview by Shishir Mathur, May 30 and June 10, 2025.

⁴¹¹ Becker, interview by Shishir Mathur, June 5, 2025.

⁴¹² Becker, interview by Shishir Mathur, June 5, 2025.

⁴¹³ Becker, interview by Shishir Mathur, June 5, 2025.

⁴¹⁴ Becker, interview by Shishir Mathur, June 5, 2025.

Table 5.1 NR: Strategies to Mitigate Socio-Economic Disadvantage

Strategies to mitigate socio-economic disadvantage				
Literature	Used/noted in local, regional, state, and federal plans; and interviews			
	PDA	County/Regional	State	Federal
Provide affordable housing in high-resource areas.	Not relevant because NR is a DAC not an HRA.	CCC GP Land Use goal/policy. ABAG housing strategies.	CalHFA Programs, tax credit program, and affordable housing legislation.	LIHTC, CDGB, HOME, and vouchers.
Provide mixed-income housing in low-income neighborhoods.	NR QOL Plan's vision: construct mixed-use developments. Delta housing redevelopment.	ABAG housing strategies.	State Tax Credit Program. CA HCD Infill Infrastructure Grant Program. AHSC funds. State Density Bonus Law.	LIHTC, CDGB, HOME, and vouchers.
Place-based strategies, for example, investing CDBG and CRA funds in local neighborhoods; other local economic development strategies, such as those to create jobs, offer job training, increase basic education, implement universal basic income, revitalize neighborhoods, and locate jobs in high-quality communities.	NR QOL Plan's vision: local employment opportunities, programs and service for youth and elderly, educational and vocational training, and infrastructure upgrades.	Actions items 1 and 13 of the Contra Costa County 2045 GP specifically for NR. GPs' county-wide workforce development goals; Workforce Development Board. GP Stronger Communities Goal action item: SSC-A1.5: Establish process for County to assist CBOs and partners to secure grants for	State Tax Credit Program. CARB California Climate Investment funds. Workforce Innovation and Opportunity Act (WIOA). State of CA Workforce Development Board's Unified Strategic Workforce Development Plan. American's Job Center of	CRA, CDBG, and SBA Loans.

Strategies to mitigate socio-economic disadvantage				
		beautification projects. ABAG strategies: universal basic income, job training, and incentives to attract employers.	California (AJCC). High Road Training Partnerships.	
Reduce disparities in accessing quality health care.		CCC GP's Goal SC-3, Policy 3.1–3.3, and Actions 3.1–3.3.		
Enhance access to healthy foods.	Food bank NR Farm Food boxes by Urban Tilth Efforts to establish a grocery store. Plans to build EV car-sharing HUB.	CCC GP's Goals SC-4, SC-5 CCC GP.	SNAP, CNIP, WIC, and Seniors Farmers Market Nutrition Program. Assembly Bill 581: The Healthy Food Financing Initiative.	

5.4 Educational Dimension (sub-dimensions ED1 and ED2)

5.4.1 Summary of disadvantages

NR was in the bottom quartile under both subdimensions of the Educational dimension—ED1 (overall low level of education) and ED2 (low-quality K–12 education). Indeed, on the 2021 Impacted Communities Indicator, NR was in the 93rd percentile in population without a high school degree.⁴¹⁵

⁴¹⁵ Contra Costa County, *Contra Costa County 2045 General Plan*, 155.

5.4.2 Local tools to mitigate education-related disadvantage

At the PDA level, the NR QOL Plan, under the category of Youth and Education, suggests four goals that emphasize a proactive investment in the youth: (1) including them in planning a future community and youth center; (2) recruiting them to participate in the Department of Children and Youth and NR Municipal Advisory Council; (3) developing youth workforce programs and career paths; and (4) prohibiting the building of walls and gates that create division in the community.⁴¹⁶ Many of these goals overlap with other goals in the NR QOL Plan, particularly youth programs that provide career opportunities and workforce development for NR residents who face barriers to employment. The NR QOL Plan has a housing goal that intersects with education, which is to build new housing in NR to stimulate the community in a number of ways, including funding for schools and employment training.⁴¹⁷ Furthermore, the Contra Costa County Office of Education, in partnership with the County's Probation Department, run the Youth Employment Services Empowerment Program, providing educational and career development services to at-risk and juvenile justice-involved youth.⁴¹⁸

Currently the nonprofits Catholic Charities and Rubicon provide employment programs to support those who have been affected by the criminal justice system. RCF and eEquip Richmond have employment partnerships with Chevron. The plan goes on to suggest more employment and educational opportunities and partnerships through Contra Costa College; green careers through Urban Tilth, The Watershed Project, and Urban Habitat Fellows; and STEM programs through Google.⁴¹⁹

Contra Costa College doesn't actively recruit in NR because the high schools are not in the community. Chevron funds the Richmond Promise, which provides \$6,000 per year in scholarship funds to every high school graduate who lives in the City of Richmond and attended a Richmond school, to cover college expenses for up to five years.⁴²⁰

Finally, the EcoVillage Farm in NR provides educational programs and mentorship opportunities to children. The EcoVillage Farm is through The Prevention Institute, a national nonprofit. Young residents of NR are taught environmental education, healthy eating, and farming skills. Additionally, the program aims to prevent children from entering the criminal justice system.⁴²¹

⁴¹⁶ Contra Costa Health Services, *Quality of Life in Contra Costa County*, 20.

⁴¹⁷ Contra Costa Health Services, *Quality of Life in Contra Costa County*, 19.

⁴¹⁸ Contra Costa County Office of Education, "Empowerment Program," https://transweb.sjsu.edu/sites/default/files/pdfs/MTI_Report_Guide.pdf (accessed December 15, 2025).

⁴¹⁹ Contra Costa County Office of Education, "Empowerment Program," 29.

⁴²⁰ Becker, interview by Shishir Mathur, June 5, 2025.

⁴²¹ Prevention Institute, "Growing a Movement: Youth Empowerment, Healthy Eating, and Preventing Violence at EcoVillage Farm," accessed December 2, 2024, <https://www.preventioninstitute.org/locations/growing-movement-youth-empowerment-healthy-eating-and-preventing-violence-ecovillage-farm>.

At the jurisdiction level, the Contra Costa County 2045 General Plan includes the priorities of the NR QOL Plan as part of their guidance section. The General Plan outlines 12 guiding principles for NR, one of which is the need for more education and training for residents.⁴²² Under policies in their guidance section, taken from the NR QOL Plan, there are two education-related policies. The first is the need for collaboration among various local stakeholders to improve existing open space for several community benefits, including educational opportunities that come from open space access. Second, community benefit agreements with large businesses would help fund schools and educational programs.⁴²³

Public schools in NR are in the West Contra Costa Unified School District (WCCUSD). In the 2024–2025 school year the WCCUSD is projected to receive 69% of funding from the Local Control Funding Formula (LCFF) and 7% from other federal funding.⁴²⁴

The West Contra Costa School District’s Teacher Support & Assistance Program (TSAP) provides support and resources to their teachers, specifically targeting those facing challenges in their classrooms through individualized support, professional development workshops and seminars, classroom observations and feedback, goal setting, and emotional and peer support.⁴²⁵

Tables 5.2 and 5.3 note the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various education-related disadvantages.

⁴²² Contra Costa County, *Contra Costa County 2045 General Plan*, 158.

⁴²³ Contra Costa County, *Contra Costa County 2045 General Plan*, 160.

⁴²⁴ West Contra Costa Unified School District, *2024–25 Local Control and Accountability Plan*, June 7, 2024, accessed March 28, 2025, <https://www.wccusd.net/cms/lib/CA01001466/Centricity/Domain/961/2024-25%20Local%20Contral%20and%20Accountability%20Planv6.7.24.pdf>.

⁴²⁵ “Teacher Support & Assistance Program (TSAP),” West Contra Costa Unified School District, accessed December 15, 2025, <https://www.wccusd.net/departments-and-areas/teacher-support-assistance-program-tsap>.

Table 5.2 NR: Strategies to Improve Education at the Community Level

Literature	Used/noted in local, regional, and state plans; and interviews		
	PDA	County/Regional	State
Labor-market relevant educational programs and partnerships with employers to develop educational programming. ⁴²⁶	The four goals under the Youth and Education category of the NR QOL Plan. Housing goal of funding for schools and employment training from new housing. Employment partnerships with Chevron. Employment and educational partnerships with Contra Costa College, Urban Tilth. The Watershed Project, Urban Habitat Fellows, and Google. Educational and mentorship opportunities through EcoVillage Farm.	County GP's one guiding principle (need for more educational and training opportunities for residents) and two policies; collaboration among stakeholders to improve existing open spaces for educational opportunities, among others; and CBAs with large businesses to fund schools and educational programs.	CAEP; College and Career Access Pathways Grant High Road Training Partnership America's Job Center for California (AJCC)
Targeted outreach to early school leavers, adults, racial minorities, and other socio-economically disadvantaged populations. ⁴²⁷			High Road Training Partnership California State Library's LTSA Community Impact Grants—fund local projects and community needs.

⁴²⁶ Broek and Hake, "Increasing Participation of Adults in Higher Education."

⁴²⁷ Broek and Hake, "Increasing Participation of Adults in Higher Education: Factors for Successful Policies."

Literature	Used/noted in local, regional, and state plans; and interviews		
Financial assistance, and online/hybrid classes. ⁴²⁸			
Local/community learning centers. ⁴²⁹			America's Job Center for California (AJCC) High Road Training Partnerships CAEP CCAP
Guidance and counseling services. ⁴³⁰		Youth Services Empowerment Program	

⁴²⁸ Broek and Hake, "Increasing Participation of Adults in Higher Education: Factors for Successful Policies."

⁴²⁹ Broek and Hake, "Increasing Participation of Adults in Higher Education: Factors for Successful Policies."

⁴³⁰ Broek and Hake, "Increasing Participation of Adults in Higher Education: Factors for Successful Policies."

Table 5.3 NR: Strategies to Improve the Quality of K–12 Education

Literature	Used/noted in local, regional, state, and federal plans				
	PDA	City/County	Regional	State	Federal
Improving teachers' quality through higher teacher salary, professional development opportunities, and performance-based pay. ⁴³¹		West Contra Costa School District's Teacher Support & Assistance Program (TSAP)			Title II, Part A
Core: instructional strategies: evidence-based literacy instruction, ⁴³² personalized/individualized learning models, ⁴³³ inquiry-based and active learning, ⁴³⁴ targeted interventions, and data-driven adjustments. ⁴³⁵				California School Dashboard Universal Transitional Kindergarten (UTK)	Title III, Part A

⁴³¹ Thomas C. Dawson and K. Lloyd Billingsley, *Unsatisfactory Performance: How California's K–12 Education System Protects Mediocrity and How Teacher Quality Can Be Improved* (September 2000), <https://eric.ed.gov/?id=ED453152>.

⁴³² Mikkaka Overstreet and Lymaris Santana, "Literacy Lens: Effective Literacy Practices for Secondary Students," *Education Northwest*, March 2024, <https://educationnorthwest.org/insights/literacy-lens-effective-literacy-practices-secondary-students>.

⁴³³ Stand Together, "7 Student-First Solutions for Education That Can Make a Difference," accessed December 8, 2025, <https://standtogether.org/stories/education/ways-to-improve-the-quality-of-education-in-the-us>.

⁴³⁴ Moreno, "K–12 Science Education Reform."

⁴³⁵ Hanover Research, "8 Ways to Close the Achievement Gap in Schools."

Literature	Used/noted in local, regional, state, and federal plans				
Systemic and equity-focused reforms: school finance reform,⁴³⁶ standards-based reform (SBR),⁴³⁷ strengthening college and career pathways,⁴³⁸ and equitable use of technology.⁴³⁹	Link education with employment	More focus on STEM		Local Control and Accountability Plan (LCAP) Community Schools Partnership Program California Universal Meals (UMP) Summer Matters Campaign After School Education and Safety (ASES) Charter School Facility Grant Program (SB740) Public Charter Schools Grant Program (PCSGP) College and Career Access Pathways Grant California Adult Education Program (CAEP)	Title I, Part A Title IV, Part A: Student Support and Academic Enrichment (SSAE) Grants Individuals with Disabilities Education Act (IDEA) Perkins Career and Technical Education Act

⁴³⁶ Kirst, “Standards-Based Education Reforms.”

⁴³⁷ Kirst, “Standards-Based Education Reforms.”

⁴³⁸ James, “K–12 Education.”

⁴³⁹ James, “K–12 Education.”

5.5 Environmental Dimension (sub-dimensions EN1, EN2, and EN3)

5.5.1 Summary of disadvantages

As per Mathur and Ferrell (2024), NR was not distressed on EN1 (air pollution) and EN2 (ground pollution minus lead). However, it was distressed on EN3 (children's lead risk exposure from housing).⁴⁴⁰

Indeed, lead-based paints were widely used before the 1960s. Therefore, homes built before that time are at a much greater risk of exposing occupants to lead. Approximately a quarter of the homes in NR were built before the 1960s, putting those residents at greater risk of lead exposure, which is especially harmful to children. Approximately 5% of NR homes were built between 1960 and 1977; homes built during this time still have a medium level of risk, compared to homes built after 1978 when lead-based paints were banned. Years built are unknown for approximately a third of the homes in NR.⁴⁴¹ This puts approximately a third of NR residents at risk of medium to high lead exposure in their homes. Hence, children in NR and the surrounding areas in Western Contra Costa County are at a disproportionate risk of lead exposure. As mentioned previously, on the 2021 Impacted Community Indicators, NR was in the 81st percentile in Children's Lead Risk from Housing.⁴⁴²

Furthermore, NR suffers from severe air and ground pollution based on other indicators. For example, as per the 2021 Impacted Community Indicators, NR was in the 77th percentile in concentration of toxic releases, 99th percentile in concentration of cleanup sites, 86th percentile in susceptibility to groundwater threats, 100th percentile in density of hazardous waste facilities, 90th percentile in proximity to impaired water bodies, 97th percentile in proximity to solid waste sites, 99th percentile for asthma-induced emergency room visits, 88th percentile in low birth weight infants, and 73rd percentile in heart attack-induced emergency visits.

Under the following categories, NR ranked below the 72nd percentile (the threshold for an indicator to be considered for the impacted community designation): 6th percentile in air quality-ozone concentration, 40th percentile in air quality: fine particle (PM2.5) concentration, 62nd percentile in diesel particulate matter emissions, 26th percentile in pesticide use, and 4th percentile in concentration of drinking water contaminants.⁴⁴³ However, according to CalEnviroScreen, NR and Richmond together are in the 80th to 100th percentile for the highest

⁴⁴⁰ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

⁴⁴¹ Pacific Institute, *Healthy Homes: A Guide to Environmentally-Sustainable and Affordable Building Materials* (Oakland, CA: Pacific Institute, 1998), accessed December 18, 2024, https://pacinst.org/wp-content/uploads/2013/02/healthy_homes.pdf, 17–18.

⁴⁴² Contra Costa County, *Contra Costa County 2045 General Plan*, 155.

⁴⁴³ Contra Costa County, *Contra Costa County 2045 General Plan*, 155.

rates of pollution in California from diesel pollution, contaminated brownfields, and toxic releases from the refinery and other industries.⁴⁴⁴

Either way, NR residents are exposed to high levels of diesel particulate matter from the Chevron Refinery, chemical industries, industrial trucks, traffic, and port and marine industries. Exposure to these pollutants leads to known health issues, such as asthma and heart and lung diseases. Pollutants from these types of industries have been found in the homes of NR residents too. There is a concentrated number of hazardous waste facilities that invite vermin, offensive odors, and heavy freight traffic.⁴⁴⁵ Indeed, NR residents are concerned with the issue of illegal dumping in their community and the health of residents due to poor environmental conditions.⁴⁴⁶

Overall, NR has historically been a community that has experienced discrimination and negligence, which has led to social and economic disadvantages and severe environmental impacts.⁴⁴⁷ NR lacks public spaces and infrastructure for recreation.⁴⁴⁸ It is also an area that is prone to coastal flooding which is a hazard to residents as well as the various industries in the area.⁴⁴⁹ Moreover, NR being an unincorporated area poses many challenges in assigning accountability for the environmental challenges residents face due to heavy industrial activity and a lack of investment in long-term climate resilience.⁴⁵⁰

5.5.2 Local tools to mitigate environmental disadvantage

Local tools to mitigate ground pollution

The local tools we found in this study are primarily focused on addressing climate-change-related sea-level rise concerns. For example, the NR Shoreline Vision was developed as a community-informed plan for climate change adaptations. It was created through a collaboration between the San Francisco Estuary Partnership and The Watershed Project in January 2017.⁴⁵¹ The plan outlines five strategies with subsequent actions to guide them. The strategies are to protect and conserve open space, to improve and increase shoreline action to the public, to green urban areas (urban greening), to restore and enhance ecosystems and habitats, and to empower

⁴⁴⁴ San Francisco Estuary Partnership, *North Richmond Shoreline Vision*, 14, <https://www.sfestuary.org/wp-content/uploads/2017/06/N.-Richmond-Shoreline-Vision.pdf>.

⁴⁴⁵ Contra Costa County, *Contra Costa County 2045 General Plan*, 155.

⁴⁴⁶ Contra Costa County, *Contra Costa County 2045 General Plan*, 153.

⁴⁴⁷ Contra Costa County, *Contra Costa County 2045 General Plan*, 155.

⁴⁴⁸ Contra Costa County, *Contra Costa County 2045 General Plan*, 155.

⁴⁴⁹ Contra Costa County, *Contra Costa County 2045 General Plan*, 154.

⁴⁵⁰ Greenbelt Alliance, "North Richmond," accessed December 6, 2024, <https://www.greenbelt.org/hotspots/north-richmond/>.

⁴⁵¹ San Francisco Estuary Partnership, *North Richmond Shoreline Vision*, 7.

stakeholders to address equity, environmental, and economic challenges.⁴⁵² This plan focused on the shoreline transition zone in NR.

Furthermore, the NR Living Levee plan is a part of the NR Collaborative Shoreline Adaptation Plan. The Living Levee plan was adopted in 2017 and has multiple purposes: to protect the community from sea level rise flooding, protect vulnerable species near the water, and create more outdoor recreational spaces for residents. The non-profit Watershed Project organized educational events for the community. Community input has played a major role in the Living Levee plan. A design firm, Mithun, was involved in the project during the Bay Area-wide Resilient by Design challenge. The challenge was for Bay Area cities to design for sea level rise. The project received nearly \$650,000 in funding from the San Francisco Restoration Authority in 2021 and another \$50,000 in 2023.⁴⁵³

Additionally, NR received \$1.5 million in grant funding in 2024 to help reduce flooding in Wildcat Creek, improve the passage of fish in the area, and reduce the amount of trash and sediment in the water.⁴⁵⁴

Under the Public Facilities and Services Element of the Contra Costa County General Plan, there is a waste diversion and reduction management goal with subsequent policies on landfill design. Policy 7.9 notes that new landfills should not impact the ecological environment, have safe transportation routes, and minimize its visual impact, noise, and hours. Policy 7.10 requires an adequate leachate and recovery system, erosion-control and drainage plan, geotechnical studies, and a habitat enhancement plan with three-to-one replacement for loss to the habitat. Policy 7.12 states that new and expanded landfills must reduce GHG emissions to meet state targets and move towards being carbon-neutral.⁴⁵⁵

Moreover, NR has a Municipal Advisory Committee (MAC) that meets monthly to address residents' concerns, review permit applications, and work with various housing initiatives. Furthermore, it manages a family center and a senior center, among other things. The MAC works collaboratively with other committees to address illegal dumping and to implement beautification projects in the community. As a Community Air Protection Program (CAPP) community under AB 617, the MAC works on air quality initiatives and sea level rise. Moreover, NR has multiple brownfield sites that the MAC is involved with, such as reviewing permit

⁴⁵² San Francisco Estuary Partnership, *North Richmond Shoreline Vision*, 2–3.

⁴⁵³ Daniel McGlynn, "How Collaborating with Community Really Works," *KneeDeep Times*, June 12, 2024, accessed December 18, 2024, <https://www.kneedeep.org/how-collaborating-with-community-really-works/>.

⁴⁵⁴ Bay Area Metro, "Bay Area Gets \$32 Million for Critical Water Quality Projects," *The Bay Link Blog*, accessed December 18, 2024, <https://blog.bayareametro.gov/posts/bay-area-gets-32-million-critical-water-quality-projects>.

⁴⁵⁵ Contra Costa County, *Contra Costa County 2045 General Plan*, 329.

applications, remediation, and monitoring. For example, the Center Point site has hazardous materials in the soil that need to be remediated and capped.⁴⁵⁶

At the time of the Biden administration, the California Department of Toxic Substances Control and EPA had a pilot program under EPA's Cumulative Impacts Initiatives to consider the cumulative impacts on a community during the site permitting processes. Consultants were hired, and numerous meetings and discussions were held. But the program has been paused by the current administration.⁴⁵⁷

Finally, the San Francisco Bay Regional Water Board has a Site Cleanup Program (SCP) for sites not federally owned to be cleaned or investigated if there is illegal contamination of groundwater, soil, etc. The Water Board is given the authority to issue cleanup and abatement of discharge in waters under Water Code Section 13304.⁴⁵⁸

Local tools to mitigate air pollution

One example of air pollution mitigation measures includes the Sierra Club working with the community on tail-pipe-emissions-led air-pollution concerns over a proposed new 555,537 square-foot warehouse for e-commerce business, called Centerpoint Strategies, just 600 feet away from Verde Elementary School. NR is a community with an already high air pollution burden and this warehouse would have added to it. Supervisor John Gioia proposed measures to require zero-emissions vehicles, phased over 5 years, until all the vehicles at the warehouse site are 100% zero-emission, which is expected to occur by 2027. The Sierra Club worked with Supervisor Gioia, Urban Tilth, and a nonprofit coalition Richmond Our Power Coalition, to require strict measures for the company to adhere to in the coming years.⁴⁵⁹

At the county level, the Contra Costa County Interim Climate Action Work Plan (Interim Work Plan) is a county-wide plan to address and adapt to climate change. There are broadly seven goals:

1. Transition the built environments to use clean energy and be carbon-neutral;
2. Create more resilient communities through green infrastructure, sequestering carbon, and addressing heat islands;

⁴⁵⁶ Pulido, interview by Shishir Mathur, May 30 and June 10, 2025.

⁴⁵⁷ Pulido, interview by Shishir Mathur, May 30 and June 10, 2025.

⁴⁵⁸ San Francisco Bay Regional Water Quality Control Board, "Site Cleanup Program," California Water Boards, accessed March 1, 2025, https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/sitecleanupprogram.html.

⁴⁵⁹ Sierra Club San Francisco Bay Chapter, "North Richmond Communities and Sierra Club Create New Standards for Warehouse Developments," *Sierra Club* (blog), July 20, 2022, <https://www.sierraclub.org/san-francisco-bay/blog/2022/07/north-richmond-communities-and-sierra-club-create-new-standards-for>.

3. Reduce single-use plastics, promote edible food recovery, and aim for no more than 2.2 pounds of solid waste a day per person;
4. Reduce water use and manage groundwater sustainability;
5. Reduce VMT, increase alternative transportation modalities, and increase EV fleet in the county;
6. Promote climate equity through clean homes, access to open space, access to healthy food, and the local economy that is less reliant on fossil fuels; and
7. The County to provide leadership in addressing climate change.

The Interim Work Plan's 2023 Progress Report reported that across all of their goals they are in progress, approaching completion, or met or exceeded the goals in all but one out of 39 items.⁴⁶⁰

Under the leadership goals, the Interim Work Plan notes that the County's Interdepartmental Climate Action Task Force meets to discuss climate action plans. Additionally, Contra Costa participates in Green Government Group (G3) Champions, which is a network of 75 county employees from 10 departments that engage in climate-focused activities and initiatives. Moreover, the County's Sustainability Team holds quarterly meetings with local governments across the county to network and plan for climate action plan-related activities and opportunities.⁴⁶¹

Focusing on addressing air pollution, at the state level, AB 617, passed in 2017, requires state air districts to work with communities impacted by air pollution. The Path to Clean Air (PTCA) was developed in response to AB 617. NR, Richmond, and San Pablo are three communities that have been identified as PCTA areas. BAAQMD and CARB have worked with the PCTA area communities to create a plan called the PCTA Plan. The purpose of the PCTA Plan is to provide strategies to reduce air pollution that is harmful to these communities. The expectation is for the state, region, and local governments to apply the strategies in the plan over the next decade. A group of community members called the PTCA Community Steering Committee (CSC) played a significant role in the plan development.⁴⁶²

⁴⁶⁰ Contra Costa County, *2023 Interim Climate Action Plan Progress Report* (Martinez, CA: Contra Costa County, 2023), accessed December 18, 2024, 3–8, <https://www.contracosta.ca.gov/DocumentCenter/View/82399/2023-Interim-Climate-Action-Plan-Progress-Report?bidId=>.

⁴⁶¹ Contra Costa County, *2023 Interim Climate Action Plan Progress Report*, 9–26.

⁴⁶² Bay Area Air Quality Management District, *Path to Clean Air Community Emissions Reduction Plan: Richmond-North Richmond-San Pablo*, April 2024, https://www.baaqmd.gov/~/media/files/ab617-community-health/richmond/2024/042024-final-ptca-plan-files/ptca-plan_final_april-2024-pdf.pdf?rev=275660fc2f6c4eeca35b13451b99856&sc_lang=en.

Efforts resulting from AB 617 have empowered residents to be agents of change. BAAQMD has successfully engaged the community and they are compensating residents for their participation.⁴⁶³

The PCTA outlines a roadmap that it calls “Implementation Mechanisms” to achieve their goals with the following strategies: Provide incentives to transition to cleaner vehicles by obtaining funding for diesel engines/equipment replacement, and EV charging/hydrogen fuel stations; Use enforcement for better environmental justice outcomes; CARB, the Air District, cities, counties, and the U.S. EPA all contribute to enforcement; Permits issued to stationary sources outline the amount of air pollution they are allowed to emit; CSC will advocate for the implementation by planning and meeting, and will communicate and collaborate with all relevant stakeholders; The community will be educated on the plan in the PCTA area; and additional research will be conducted on various aspects of the plan.⁴⁶⁴

Local tools to mitigate lead exposure

At the federal level, Project REAL (Richmond Effort to Abate Lead) is a HUD program that provides lead tests for children under six and remediation if lead hazard is found.⁴⁶⁵ Additionally, the Pacific Institute is an Oakland-based nonprofit research organization that focuses on water and environmental conservation, advocating for building public awareness around lead exposure and outreach to high-risk communities such as NR. They also call for better access to lead screening, tracking, and providing resources for remediation.

Tables 5.4, 5.5, and 5.6 note the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various environmental disadvantages.

⁴⁶³ Pulido, interview by Shishir Mathur, May 30 and June 10, 2025.

⁴⁶⁴ Bay Area Air Quality Management District, *Path to Clean Air Community Emissions Reduction Plan*, 149–150.

⁴⁶⁵ Pacific Institute, *Healthy Homes: A Guide to Environmentally-Sustainable and Affordable Building Materials* (Oakland, CA: Pacific Institute, 1998), 19–20, https://pacinst.org/wp-content/uploads/2013/02/healthy_homes.pdf.

Table 5.4 NR: Strategies to Mitigate Groundwater Pollution

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
	PDA	County/Regional	State	Federal
Proper landfill design.		CCC GP – Public Facilities Element-P7.9, 7.10, and 7.12.		
Laws and penalties to prevent contamination.		NPDES: requires permit for wastewater discharge—managed by SFBRWQCB; and SFBRWQCB’s SCP.	SWB’s GAMA.	NPDES: requires a permit for wastewater discharge.
Identify and isolate contaminated zones.	Year 2024 grant to reduce trash in Wildcat Creek.	SFBRWQCB’s SCP.		
Prevent soil erosion				
Reduce sediment-containing surface runoff.	Year 2024 grant to reduce sediment in Wildcat Creek.			
Monitoring and inspection of polluting sources (e.g., septic, fuel, and chemical tanks).		NPDES: quality and monitoring requirements—managed by SFBRWQCB. SFBRWQCB’s SCP.	SWB’s GAMA.	NPDES: quality and monitoring requirements.
Control uses in the aquifer recharge areas.				
Educational campaigns.	The Watershed Project; and Resilient by Design Challenge.			
Prevent Sea level rise.	NR Shoreline Vision and NR Living Levee Plan; and Year 2024 grant to reduce flooding in Wildcat Creek.	ABAG/MTC Plan Bay Area 2050 Environmental Strategy EN1.		

Table 5.5 NR: Strategies to Mitigate Children’s Exposure to Lead

Literature	Used/noted in local, regional, and state plans		
	PDA	County/Regional	State
Strong lead poisoning prevention programs—universal screening and public education.		County GP notes lead risk in older buildings and provides a map of lead risk areas, but there are no specific goals in the GP. Pacific Institute’s public awareness campaigns.	Childhood Lead Poisoning Prevention Acts; Residential Lead-Based Paint Hazard Reduction Act; and State civil and health codes: buildings with lead hazards are in violation of State housing laws.
Identify and eliminate sources of lead contamination (e.g., paint and water pipes).			Childhood Lead Poisoning Prevention Acts.
Remove structural racism: job creation, small business development, affordable housing, and improved social cohesion.	See tools under the socio-economic dimension.		

Table 5.6 NR: Strategies to Mitigate Air Pollution

Literature	Used/noted in local, regional, state, and federal plans			
	PDA	County/Regional	State	Federal
Legislation (e.g., U.S. Clean Air Act), emission taxes, and policies and programs.	Five-year plan to make all vehicles zero-emission for a proposed warehouse.	Contra Costa County Interim Action Work Plan Goals 1, 5, and 7; Interdepartmental Climate Action Task Force; G3 Champions; and PACTA Plan.	AB32, SB32 and SB375; AB 617: PACTA areas; and CARB policies to regulate and reduce air pollution such as Advanced Clean Fleet regulation.	Clean Air Act: (major sources, area sources, mobile sources, indoor).
Economic tools and Incentives: subsidies for pollution abatement; and emissions trading, banking, and caps.		ABAG/MTC Plan Bay Area 2050 Environmental Strategies EN 2, 3, and 6, 7, and 8.	CARB's Cap-and-Trade Program; CARB – Funding Guidelines; and AB 1550.	Congestion Mitigation and Air Quality Funds; and Climate Pollution Reduction Grants.
Enhanced air pollution monitoring and modeling.			CARB policies similar to Owning our Air policies (see WO case study); and AB 398.	EPA Ambient Air Monitoring.
Road-side vegetation, and greening.				
Reduce emissions by transport sector: promote electrification and EVs, dissuade auto use, promote non-auto use, and higher emissions and fuel standards.		ABAG/MTC Plan Bay Area EN6: invest in parks, trails, and recreational facilities; and ABAG/MTC: EN7, EN8, and EN9.	CARB policies State laws, such as SB 535, AB 617, and AB 398; REAP; and AB 1358.	Congestion Mitigation and Air Quality Funds; and Clean Air Act.

Literature	Used/noted in local, regional, state, and federal plans			
Reduce emissions by energy sector: clean and renewable energy sources, cleaner industrial production, higher emission standards, monitoring of air pollution by industries, and elimination/relocation of polluting industries.			CARB policies; and State laws, such as SB 535, and AB 617.	Clean Air Act.

5.6 Transportation Dimension (sub-dimensions TR1, TR2, TR3, TR4, and TR5)

5.6.1 Summary of disadvantages

Mathur and Ferrell (2024) identified NR with no indication of disadvantage on TR1 (household level mobility). NR was highly disadvantaged on TR2 (local non-auto accessibility), not disadvantaged on TR3 (local transit accessibility), highly disadvantaged on TR4 (overall local/neighborhood accessibility), and partially disadvantaged on TR5 (regional transit accessibility).⁴⁶⁶

Local data reinforces many of the above findings about the lack of local and regional accessibility. The industrial land use in NR, coupled with the regional transportation corridors in the area, has isolated the community, reducing local accessibility.⁴⁶⁷ The Richmond Parkway and other transportation infrastructure run through the creeks in NR.⁴⁶⁸ NR residents are concerned about heavy traffic from commuters and commercial vehicles that use neighborhood streets during peak traffic hours on the freeways 580 and 80.⁴⁶⁹

Most jobs in NR are not held by residents, which leads to heavy commuting in and out of the community. According to the 2021 American Community Survey, the commute patterns in NR have an inflow of 1,863 workers, an outflow of 1,348 workers, and only 45 workers live and work

⁴⁶⁶ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

⁴⁶⁷ San Francisco Estuary Partnership, *North Richmond Shoreline Vision*, 11, <https://www.sfestuary.org/wp-content/uploads/2017/06/N.-Richmond-Shoreline-Vision.pdf>.

⁴⁶⁸ San Francisco Estuary Partnership, *North Richmond Shoreline Vision*, 46.

⁴⁶⁹ Contra Costa Health Services, *Quality of Life in Contra Costa County*, 21.

within NR. 56% of commuters are in their car alone, 24.6% carpool, 6.3% use public transit, and 13% use some other form of transportation. Approximately 28% of NR residents commute over 25 miles to their jobs, which, given the peak hour traffic congestion, reduces regional accessibility. NR has a jobs and housing imbalance that has led to high VMT and has contributed to GHG emissions in the community.⁴⁷⁰

Moreover, NR does not have a TOD designation because it is not close to a BART station. New real estate developments in NR consider bus routes and bike route patterns.⁴⁷¹ Finally, NR's accessibility to BART is poor. Taking a bus or biking to the BART is possible, but sidewalks do not exist for pedestrians to walk to BART.⁴⁷²

Finally, Richmond Parkway, a major transportation corridor, has had several environmental and social impacts on its surrounding neighborhoods, including poor air quality, neighborhood division, and safety issues for pedestrians and bicyclists.

5.6.2 Local tools to mitigate transportation-related disadvantage

To enhance local, especially non-auto accessibility, the NR QOL Plan advocates for increased street safety through Vision Zero program policies and Complete Streets designs for safety and traffic-calming measures. Vision Zero is a county policy and they are requesting it be adopted in NR and included in a NR Specific Plan, which currently does not exist. The NR RLT also advocates for more active transportation infrastructure, such as bike parking.⁴⁷³ The Integrated Strategies section of the NR QOL Plan calls for more walkability, access to public transit, traffic safety, discounted fares, better bus shelters, first/last-mile connections, and better access to transit for youth in the community. They want more alternative options to automobile dependency for their residents.

The Richmond Parkway Transportation Plan was adopted in February 2025 by the West Contra Costa Transportation Commission (WCCTC). The plan focuses on increasing safety along the Richmond Parkway between I-580 and I-80, placemaking, improved access to destinations, reduced traffic congestion, and improved public health.⁴⁷⁴ The plan calls for pedestrian and bicyclist access over, under, and through the Parkway; improved signages; and safety crossing

⁴⁷⁰ Greenbelt Alliance, "North Richmond," accessed December 18, 2024, <https://www.greenbelt.org/hotspots/north-richmond/>.

⁴⁷¹ Don Gilmore (Executive Director, Community Housing Development Corporation) interview by Shishir Mathur, May 30 & June 11, 2025.

⁴⁷² Pulido, interview by Shishir Mathur, May 30 and June 10, 2025.

⁴⁷³ Contra Costa Health Services, *Quality of Life in Contra Costa County*, 21.

⁴⁷⁴ West Contra Costa Transportation Advisory Committee, "Richmond Parkway Transportation Plan," February 28, 2025, accessed April 25, 2025, https://www.westcontracostatc.gov/files/managed/Document/1457/250228_RPTP_Final_noAppendices.pdf.

measures, such as sidewalk improvements, bulb-outs, crosswalks, and pedestrian signals. Around \$10–18 million of Regional Measure 3 funds are dedicated to Richmond Parkway Plan projects.⁴⁷⁵

At the jurisdiction level, the Contra Costa County 2045 General Plan incorporated some of the transportation-related requests from the NR QOL Plan, such as promoting active transportation modes by reducing dangerous intersections, reducing cut-through traffic on Richmond Parkway, and addressing traffic speeding concerns. The plan included three additional action items related to NR transportation: provide adequate pedestrian and bicycle infrastructure to Verde Elementary School as part of the Safe Routes to School Program, install pedestrian and bicycle improvements on Fred Jackson Way, and designate truck routes to reduce the impact on schools and neighborhoods.⁴⁷⁶

The General Plan included two NR transportation-specific guiding principles. The first is repairing and adding sidewalks, adding more street lights, improving parking, and addressing illegal dumping. The second is improving access and affordability of public transportation by including more stops, connections, bus shelters, benches, lighting, and landscaping near stops. The General Plan’s policies section includes one NR transportation-specific policy which is to support the implementation of the 2020 Richmond Area Community-Based Transportation Plan.⁴⁷⁷

Among the other jurisdiction-level tools, the West Contra Costa Transportation Advisory Committee (WCCTAC) supports the NR Green Streets Corridor Concept. This project is a part of a regional “sustainable streets” effort that includes pedestrian and bicycle routes through NR and connecting to San Pablo and Richmond. The project is part of the county-wide Bike/Ped Plan in the 2019 Contra Costa Green Infrastructure Plan. The plan involves partnerships with The Watershed Project, Urban Tilth, West County Wastewater District, and the East Bay Regional Park District. The NR Green Streets Corridor would extend the completed NR Watershed Connections, an award-winning, urban greening, and place-making project that was funded by the State Conservancy with a \$1 million grant. They are seeking additional funding partnerships for this project.⁴⁷⁸

The WCCTAC also supports a TDM program that encourages active transportation, as part of a county-wide program. The TDM program is funded by Measure J and grants from the Air

⁴⁷⁵ John Nemeth (Executive Director, West Contra Costa Transportation Commission) interview by Shishir Mathur, May 27, 2025.

⁴⁷⁶ Contra Costa County, *Contra Costa County 2045 General Plan*, 162.

⁴⁷⁷ Contra Costa County, *Contra Costa County 2045 General Plan*, 160.

⁴⁷⁸ West Contra Costa Transportation Advisory Committee, *WCCTAC Technical Advisory Committee Packet*, May 9, 2024, 4A-2, 4A-3, accessed December 20, 2024, <https://www.westcontracostatc.gov/files/managed/Document/1326/05-09-24%20-%20WCCTAC%20TAC%20Packet%20%28FINAL%29.pdf>.

District.⁴⁷⁹ Measure J was voted in by Contra Costa residents in 2004. It extends a half-cent transportation sales tax until 2034. This amounts to approximately \$2.5 billion for county-wide transportation-related improvements such as road improvements, carpool corridors, transit for seniors and people with disabilities, widening State Route 4, eBART extension, and revising the Growth Management Program.⁴⁸⁰

Tables 5.7, 5.8, and 5.9 note the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various transportation disadvantages.

Table 5.7 NR: Strategies to Enhance Household Level and Local Accessibility (Dimensions 1 to 3)

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
	PDA	County/Regional	State	Federal
Investments in transit.	NR QOL Plan calls for better access to transit and bus shelters.	The CC County 2045 GP guiding principles related to improving access and affordability of public transportation; Following ABAG/MTC's transit strategies: T1, T2, and T10; MTC TDA; and BART TOD Plans/ Strategies.	TDA; Transit Action Strategy; Free Fares for School; and Safe Routes to School.	
Investments in walk/bike infrastructure.	NR QOL Plan calls for more active transportation infrastructure, enhanced walkability, and complete streets; and NR Green Streets Corridor Concept.	The CC County 2045 GP notes specific walk/bike projects for NR; WCCTAC; Following ABAG/MTC's transit strategies: T2 and T7; MTC Resolution 4505; and BART TOD Plans/ Strategies.	Safe Routes to School; ATP Clean Mobility Options for Disadvantaged Communities; and California Complete Streets Act of 2008.	FTA TOD Program; and CMAQ.

⁴⁷⁹ West Contra Costa Transportation Advisory Committee, *WCCTAC Technical Advisory Committee Packet*, 4B-4.

⁴⁸⁰ Contra Costa Transportation Authority, "Funding," accessed December 20, 2024, <https://ccta.net/about-us/funding/>.

Table 5.8 NR: Strategies to Promote Overall Local/Neighborhood Accessibility (Dimension 4)

Literature	Used/noted in local, regional, state, and federal plans			
	PDA	County/Regional	State	Federal
Traffic calming and other TDM measures.	NR QOL Plan calls for increased street safety through Vision Zero Programs and Policies.	The CC County 2045 GP notes specific traffic safety projects for NR; WCCTAC-supported TDM program; and Following ABAG's transit strategies: T8 and T9.	Safe Routes to School.	Congestion Mitigation and Air Quality Funds; MAP-21; and Safe Streets for All (SS4A).
Tools to increase density and land use diversity, such as compact, mixed-use infill TODs.		ABAG's tools and policies to encourage development in PDAs and Transit-Rich PDAs.	California HCD TOD Housing Program – build homes near transit; California HCD Infill Infrastructure Grant Program; and AHSC, SB79, AB1244, and SB358	FTA TOD.

Table 5.9 NR: Strategies to Promote Regional Accessibility (Dimension 5)

Literature	Used/noted in local, regional, state, and federal plans			
	PDA	Regional	State	Federal
Regional land use planning.		Plan Bay Area overall and following ABAG's transit strategies, specifically: T1 and T10.	AB32 and SB375; Density Bonus Law; and Housing Accountability Act.	
Corridor planning			AB 2011	
Job/housing balance & match.		ABAG RHNA requires 441,176 new housing units from 2023–2031	RHNA numbers determined by CA Dept of Housing and Community Development; AB 2864; Inter-Regional Partnership program; and CA Govt Code: Section 65890.1, Section 65890.3, and Section 65890.5.	
Provision of affordable housing.	NR QOL Plan's vision: prioritize affordable housing, construct mixed-use developments, and programs to support homeless.	ABAG's housing strategies.	CalHFA Programs; tax credit program; Affordable housing legislation; SB 375; and Density Bonus Law.	
Diverse employment options within DACs.	Quality of Life Plan's vision: local employment opportunities, programs and service for youth and elderly, educational and vocational training, and infrastructure upgrades.	EC4 ABAG.		
Transit accessibility to diverse employment options outside DACs.		Following ABAG's transit strategies: T1, T2, and T10.		

5.7 Case Study Analysis

5.7.1 Socio-economic dimension

NR demonstrates high levels of disadvantage under the demographic sub-dimension of concentration of racial minorities and under the economic sub-dimension of concentration of poverty.

NR grew during World War II as a housing community for African-American shipyard workers. Currently, it is a Hispanic-majority community facing extreme poverty. Most of the tools employed to address NR's socio-economic disadvantage focus on providing affordable housing and down payment assistance, offering local employment opportunities, promoting local small businesses, making the community inviting to large businesses, providing workforce training for youth, conducting cleanups and beautification, and enhancing access to healthy foods. Notable is the community benefits agreement between the City of Richmond, Contra Costa County, and the landfill, which provides \$1 million/year for beautification projects.

On-the-ground implementation is strong in the areas of access to healthy food and, to some extent, housing. In the rest, the plans and policies lack clear evidence of on-the-ground impact.

Overall, the efforts to mitigate socio-economic disadvantage are modest at best.

5.7.2 Educational dimension

NR has a high level of disadvantage on ED1 (overall low level of education) and ED2 (low-quality K–12 education).

The primary tools to enhance the overall educational quality of the community, or the quality of K–12 education relate to workforce development and involve youth in the planning of the community. While several of these tools are available at the PDA, city, state, and federal levels, their implementation in NR seems limited, except for employment-training-related programs. Many tools are available at the state and federal levels to mitigate NR's K–12 education quality-related disadvantages, but their effectiveness could not be assessed due to the inability to interview school district staff.

5.7.3 Environmental dimension

NR faces severe air and ground pollution, as well as a risk of lead exposure for children.

The pollutants that cause air and ground pollution in NR are generated by toxic releases from oil refineries, chemical and port/marine industries, industrial trucks, and contaminated brownfields, leading to high rates of asthma, cardiovascular disease, and low birth weight. NR is also prone to coastal flooding driven by sea-level rise. Tools to address ground pollution have primarily focused

on sea level rise and have mainly taken the form of plans and community outreach efforts, with some funds used to reduce flood risk for a local creek (Wildcat Creek).

The PACTA Plan and the Contra Costa County Interim Climate Action Work Plan are the primary tools for mitigating air pollution. While the plans are very comprehensive, ranging from replacing diesel engines/equipment to better enforcement of pollution-related rules, on-the-ground actions are limited. One notable project requires a large warehouse to gradually adopt all zero-emission vehicles.

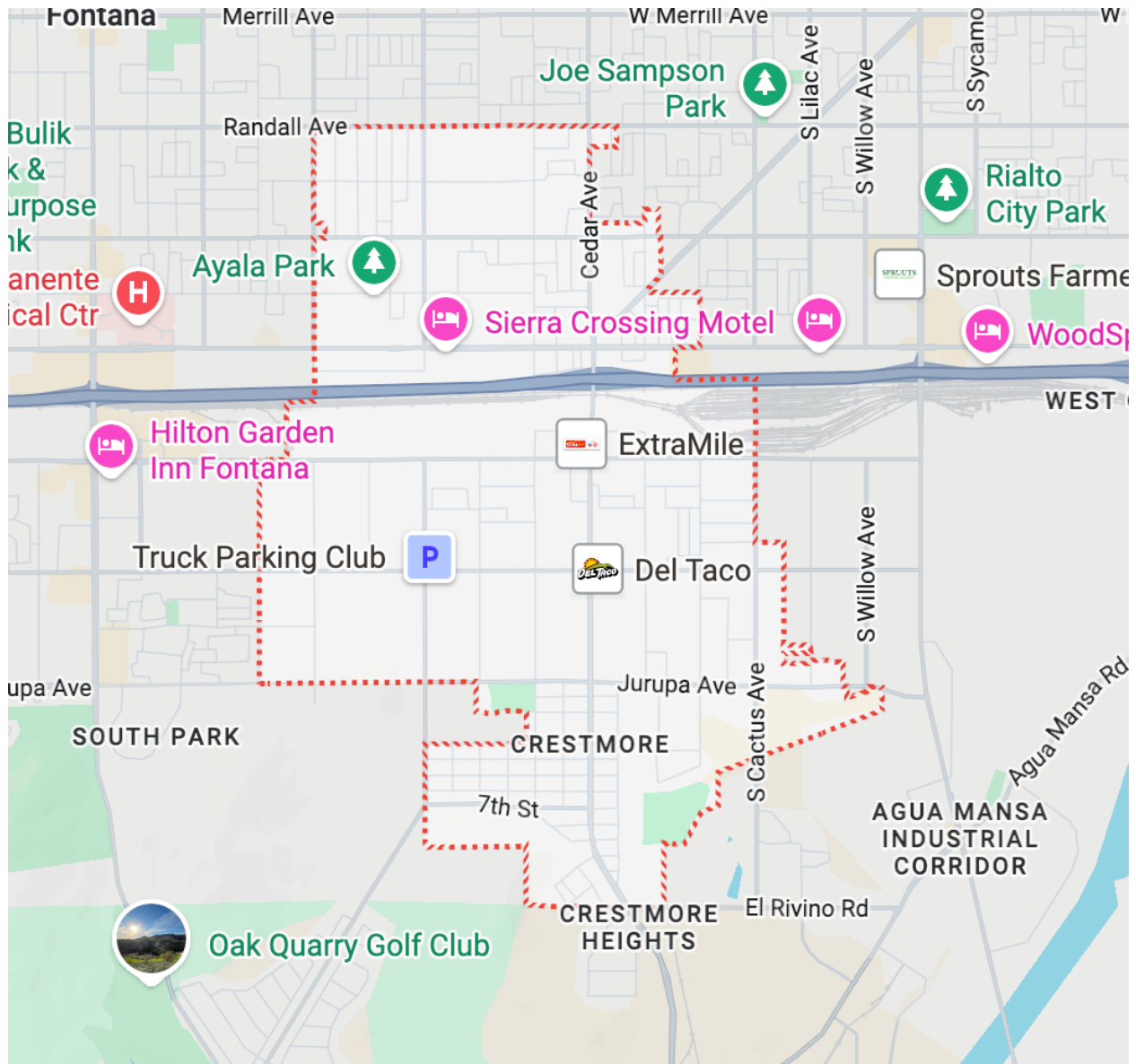
The HUD-funded REAL project mitigates threats to children's lead exposure by testing children for lead levels and assisting with remediation if lead is found. In summary, the efficacy of the tools to mitigate environmental disadvantage is low to moderate.

5.7.4 Transportation dimension

NR has no disadvantage under TR1 (household level mobility) and TR3 (local transit accessibility), a high level of disadvantage under TR2 (ped/bike accessibility) and TR4 (overall local accessibility), and some disadvantage under TR5 (regional transit accessibility). Local accessibility is limited by industrial uses and major regional transportation corridors going through the community. Freeway congestion during peak traffic time leads commuters to use NR's internal streets, further worsening local accessibility. Pedestrian safety, including sidewalks, is lacking. The local and county plans call for supporting pedestrians and transit users through increased street safety, complete streets programs, traffic calming, improved street lighting, bike parking, better bus shelters, and various improvement projects along the Richmond Parkway, a major transportation corridor in this community. While the plans are ambitious, on-the-ground improvements are limited and include some projects along the Richmond Parkway, such as complete streets projects and trail enhancements. In summary, the efficacy of the tools to mitigate transportation disadvantage in NR is low.

6. Bloomington Case Study

Figure 6.1 Map of Bloomington, California⁴⁸¹



⁴⁸¹ Google Maps, Bloomington, California (screenshot by author, November 18, 2025), <https://www.google.com/maps>.

A map of Southern California with a red dashed line outlining a region. A red star marks the location of Bloomington, California, which is labeled in large red text. The map shows major cities including Bakersfield, Ridgecrest, Los Angeles, Long Beach, Santa Monica, San Bernardino, Palm Springs, Laughlin, King, Lake Havasu City, and Blythe. It also displays several National Forests and National Parks: Sequoia National Forest, Angeles National Forest, Mojave National Preserve, Bernardino National Forest, and Joshua Tree National Park. Major highways are indicated with numbered shields: 15, 40, 10, and 405. The Colorado River Reservation is also shown in the southeast.

Bloomington is a 6.07 square mile⁴⁸³ unincorporated community in San Bernardino County, California. The community is located approximately 50 miles east of Los Angeles. Fontana and Rialto are neighboring cities.⁴⁸⁴ Interstate 10 is a major east-west corridor that crosses through the entire community. See Figures 6.1 and 6.2 for Bloomington's location.

⁴⁸² Google Maps, Bloomington's location within San Bernardino County, California (screenshot by author, December 14, 2025), <https://www.google.com/maps>.

⁴⁸⁴ San Bernardino County, Countywide Plan, *Bloomington County Plan*, July 2020, 21, https://countywideplan.com/wp-content/uploads/sites/68/2020/07/Bloomington_CAG_2020.pdf.

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There are also industrial businesses, retail businesses, and some restaurants along Interstate 10. Approximately 700 acres of land in Bloomington are vacant.⁴⁸⁶ The community takes pride in agricultural and rural roots, an identity they want to preserve.⁴⁸⁷

Demographically, Bloomington is 85% Hispanic or Latino, 11% white alone (not Hispanic or Latino), 2% Black, and 1% Asian.⁴⁸⁸ Overall, Bloomington is more Hispanic and less white compared to the metropolitan area (Riverside-San Bernardino-Ontario) and the state which are 52% and 29% white and 40% and 35% Hispanic, respectively.⁴⁸⁹

In 2023, the top four industries by employment in Bloomington were retail trade and warehousing (16.1% and 16%, respectively), followed by health care and social assistance (1.8%) and construction (0.6%).⁴⁹⁰

6.2 Summary of Disadvantages

Mathur and Ferrell (2024) found that within the five dimensions, Bloomington had low levels of disadvantages under Demographic and Economic dimensions, moderate levels under Educational and Environmental dimensions, and high levels under the Transportation dimension.⁴⁹¹

6.3 Socio-economic Dimension (sub-dimensions DE1 and DE2 of the demographic dimension and EC1 and EC2 of the economic dimension)

6.3.1 Demographic (sub-dimensions DE1 and DE2)

Bloomington demonstrated some level of distress under the sub-dimensions concentration of racial minorities and single-parent households.⁴⁹²

In 2020, the San Bernardino County Community Development and Housing Agency's Consolidated Plan found that Hispanic households in Bloomington had the greatest housing need. A housing need is defined as having one or more of the following: spending 30% or more

⁴⁸⁶ San Bernardino County, Countywide Plan, 3.

⁴⁸⁷ County of San Bernardino Department of Land Use Services, *Valley Corridor Specific Plan*, March 2017 (San Bernardino County, CA: San Bernardino County Department of Land Use Services, 2017), 1-2, <https://lus.sbcounty.gov/wp-content/uploads/sites/48/SpecificPlans/ValleyCorridorSPMarch2017web.pdf>.

⁴⁸⁸ U.S. Census Bureau, "QuickFacts: Bloomington CDP, California."

⁴⁸⁹ Census Reporter, "Bloomington, California (16000US0607064), Profile Data," accessed November 9, 2025, <https://censusreporter.org/profiles/16000US0607064-bloomington-ca/>.

⁴⁹⁰ "Bloomington, CA," *Data USA*, accessed November 9, 2025, <https://datausa.io/profile/geo/bloomington-ca>.

⁴⁹¹ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

⁴⁹² Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

of gross household income on housing costs, having more than one person per room in the home, not having a full kitchen in the home, or lacking complete plumbing in the home.⁴⁹³ Furthermore, county-wide, among the extremely low-income households (those earning 0% to 30% of AMI), 77% had at least one housing problem, with 88% of African-American households and 83% of Hispanic households experiencing at least one housing problem.⁴⁹⁴

Overall socio-economic distress is also evident in the lack of community participation in planning processes. For example, when San Bernardino was developing the Consolidated Plan, they held public hearings and engaged in community outreach. The community meeting with Bloomington residents was attended by only four community members. Nonetheless, the greatest concerns of these members were the lack of affordable housing and supply, people needing to choose between rent and food, poor housing conditions in south Bloomington, a lack of homelessness resources, and poor sewer infrastructure, sidewalks, public safety, and air quality.

The attendees called for more mixed-use development, compact housing for affordability, housing developers and healthcare providers partnerships, and recreational options for families.⁴⁹⁵ However, there is a sewer overflow problem in some locations when there are floods due to septic tank overflow and an overcapacity sewer system, which on one hand limits options to develop new housing, and on the other hand is used as a tool by the local community to maintain its rural character through reliance on septic tanks.⁴⁹⁶

Finally, Interstate 10 runs through the community and its location makes it challenging to develop new housing near it.⁴⁹⁷

The distress along the second indicator, single-parent households, is underscored by the data from San Bernardino County's Preschool Services Department (PSD), which notes that a family receiving services is commonly a single Hispanic/Latina parent, who earns less than federal poverty thresholds, and has a high school diploma. PSD is the largest provider of early childhood services in the county. It provides services to over 5,000 children through the following programs: Early Head Start, Head Start, Early Head Start-Child Care Partnership, California State Preschool

⁴⁹³ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 114–15.

⁴⁹⁴ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*.

⁴⁹⁵ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 35.

⁴⁹⁶ Gem Montes (Policy Advocate and Analyst, People's Collective for Environmental Justice (PC4EJ)), interview by Shishir Mathur and Christopher Ferrell, September 04, 2025.

⁴⁹⁷ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, (March 2017), accessed July 3, 2025, 2-11, <https://lus.sbcounty.gov/wp-content/uploads/sites/48/SpecificPlans/ValleyCorridorSPMarch2017web.pdf>.

Program, Low Income First Time Pregnant Mothers Program, and Home Visitation Program.⁴⁹⁸ Families qualify for services based on income.⁴⁹⁹

Moreover, there was a 6% decrease in licensed childcare centers and a 40% decrease in licensed home-based child care in San Bernardino County between 2010 and 2018, indicating that affordable childcare for single-parent families is likely a growing challenge in the county.⁵⁰⁰

6.3.2 Economic (sub-dimensions EC1 and EC2)

Mathur and Ferrell (2024) found that Bloomington had a low level of disadvantage under the sub-dimensions EC1 (a lack of affordable housing) and EC2 (concentrated poverty).⁵⁰¹

Indeed, Bloomington's household incomes and poverty rate mirror the county's household incomes and poverty rate. Bloomington's median household income in 2023 was \$81,220 and the poverty rate was 15.2%,⁵⁰² compared to San Bernardino County's median household income of \$82,184 and 13.2% poverty rate.⁵⁰³ The rate of owner-occupied housing from 2019 to 2023 was 66.3% in Bloomington.⁵⁰⁴

Similarly, among Southern California counties, San Bernardino had one of the most favorable income-to-cost-of-living ratios. In 2019, the national median income was \$65,712, with an average cost-of-living index of 100. San Bernardino County's median income was \$67,903, with a cost-of-living index of 117.8, meaning the cost of living was approximately only 18% more than the national average.⁵⁰⁵

Further reflecting the mild economic distress, the 2013 Bloomington Community Plan did not identify the local economy as a priority for the community, although it does call for attracting

⁴⁹⁸ San Bernardino County Preschool Services Department, *Comprehensive Community Assessment, 2020–2025 Program Years*, 2.

⁴⁹⁹ San Bernardino County Preschool Services Department, *Comprehensive Community Assessment*, 4.

⁵⁰⁰ San Bernardino County Innovation & Technology Department, San Bernardino County Community Indicators Report 2020, December 2021, 38, https://indicators.sbcounty.gov/wp-content/uploads/sites/29/2021/12/CIR_2020_Report.pdf.

⁵⁰¹ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

⁵⁰² U.S. Census Bureau, *QuickFacts: Bloomington CDP, California*, accessed June 4, 2025, <https://www.census.gov/quickfacts/fact/table/bloomingtoncdpcalifornia/IPE120223>.

⁵⁰³ U.S. Census Bureau, *QuickFacts: San Bernardino County*.

⁵⁰⁴ U.S. Census Bureau, *QuickFacts: Bloomington CDP*.

⁵⁰⁵ San Bernardino County, San Bernardino County Board of Supervisors, Community Indicators Report 2020, (December 2021), accessed July 10, 2025, 59, https://indicators.sbcounty.gov/wp-content/uploads/sites/29/2021/12/CIR_2020_Report.pdf.

businesses and jobs for residents, home-based business assistance for residents, and improving the fiscal balance by attracting non-residential businesses.⁵⁰⁶

However, homelessness is increasing. The number of people who are homeless has increased in the county, from 2,118 in 2018 to 3,125 in 2020.⁵⁰⁷ 799 were Hispanic/Latino and 1,696 were non-Hispanic/Latino.⁵⁰⁸ Specific to Bloomington, according to the 2025 San Bernardino County Point-in-Time (PIT) Count, Bloomington had 33 individuals experiencing homelessness, all of whom were unsheltered, out of a countywide total of 3,831. While homelessness is generally more concentrated in the incorporated cities, Bloomington has a higher number of unhoused individuals compared to most other unincorporated areas of the county.⁵⁰⁹

6.3.3 Local tools to mitigate socio-economic disadvantage

Bloomington-level tools

The local tools used to mitigate socio-economic disadvantage primarily focus on attracting commercial uses, increasing housing supply through compact development, economic and workforce development, and infrastructure provision.

Focusing on attracting commercial uses, a 2024 zoning amendment changed the Bloomington Commercial Center from a Rural Living 5-Acre Minimum Lot Area to General Commercial, intended to lead to higher-density development there.⁵¹⁰

Focusing on attracting commercial uses and increasing housing supply through compact development, in 2017 San Bernardino County identified Bloomington's Valley Boulevard as a commercial corridor for reinvestment as introduced in the Valley Corridor Specific Plan (VCSP). The aim is to use Valley Boulevard as a catalyst to rejuvenate Bloomington by providing infrastructure and streamlining the development code to attract private development to this corridor, which has poor-quality infrastructure (lack of sewer infrastructure is one of the biggest challenges), is a food desert, and has faced neglect historically. Towards that aim, the County is in the process of updating the VCSP, which was originally developed in 2017. Furthermore, the County is currently undertaking a visioning exercise for the Valley Corridor with the help of Urban

⁵⁰⁶ San Bernardino County, Countywide Plan, *Bloomington County Plan*, July 2020, 18, https://countywideplan.com/wp-content/uploads/sites/68/2020/07/Bloomington_CAG_2020.pdf.

⁵⁰⁷ San Bernardino County, San Bernardino County Board of Supervisors, Community Indicators Report 2020.

⁵⁰⁸ County of San Bernardino, Department of Community Development and Housing, *2020-2025 Consolidated Plan*, 77.

⁵⁰⁹ Carrie Harmon (Director, Housing and Community Development, County of San Bernardino), Derek Armstrong (Economic Development Director, County of San Bernardino), and Deepak Bahl (Deputy Director, Economic Development, County of San Bernardino), interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁵¹⁰ San Bernardino County Land Use Services Department, 2024 Countywide Policy Plan: General Plan Annual Progress Report, (Submitted in 2025), accessed June 27, 2025, 10, https://lus.sbcounty.gov/wp-content/uploads/sites/48/2025_SanBernardinoCountyGeneralPlanAPR_-Final-3_25.pdf.

Land Institute (ULI) to address the underserved population of Bloomington and the corridor. The area has a history of neglect with poor infrastructure, some persistent pollution problems, and underdeveloped/low-density development patterns that are a hindrance to more intensive development in the future. The County aims to consolidate existing lots and acquire low-density large (underutilized) lots to spur development of medium density housing and neighborhood commercial.⁵¹¹

Bloomington is bisected by I-10 into northern and southern areas, which are very different. The southern half, which is close to I-10, has train tracks and several warehouses, and residences and schools further south. The northern half has no large warehouses, though it has strip malls and large lots, followed by residences further north. The northern part close to I-10 is a commercial corridor with large lots. Hence the challenge is to densify it by providing a mix of market-rate and affordable housing that can support neighborhood retail. The County is exploring purchasing some large lots (such as strip malls and car dealerships) where mixed-use developments, a fire station, an animal care facility, etc., can be developed. A five-story hotel is in the entitlement process. An update to plans and investments for wastewater infrastructure in the area is in the works. The County is also exploring federal funding through the U.S. Department of Commerce's Economic Development Administration to provide off-site public infrastructure such as roads, water, and waste water. Recent federal infrastructure funds have helped develop sewers along the Valley Corridor. Moreover, the region has recently designated one major transportation corridor—San Bernardino Avenue—as a bus rapid transit (BRT) route, so the County government expects this will be a catalyst for more walkable and transit-friendly investments/development.⁵¹²

The VCSP has eleven guiding principles, one of which is providing a mix of housing options to provide choice across preferences and economic feasibility.⁵¹³ Moreover, the Land Use and Housing Elements of the VCSP have the following goals for the County: enable residential land use that has a mix of densities, affordability, and locations that are in urban and rural neighborhoods; provide a mix of housing types that meets the preferences and affordability of current and future residents, including people with special needs; maintain and reinvest in neighborhoods to ensure they are safe and healthy, as well as upgrade housing stock; develop, maintain, and modernize affordable housing; and assist residents to rent or own housing.⁵¹⁴

⁵¹¹ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁵¹² Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁵¹³ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, (March 2017), accessed July 3, 2025, 1–2, <https://lus.sbcounty.gov/wp-content/uploads/sites/48/SpecificPlans/ValleyCorridorSPMarch2017web.pdf>.

⁵¹⁴ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5–5.

Around the time VCSP was being adopted in 2017, change started to occur through a mixed-use project—Bloomington Grove—that was completed that same year. This project has gained widespread recognition for its affordable and livable design. It was developed in three phases. The first phase was developed in 2016 and included a 6,500 square foot Bloomington Public Library and 106 housing units for both families and seniors (55 and older). The second phase was developed in 2017 and added 84 housing units.⁵¹⁵ The third phase was developed in 2021 and included 98 units, 20 of which were allocated for special needs residents, who were referred through the County of San Bernardino Department of Mental Health and the Inland Empire Health Plan. Residents are able to access social services onsite through Programs to Accelerate Transformative Housing (PATH) and the Boys and Girls Club of Fontana. Phase three also included an 8,500-square-foot public park.⁵¹⁶

Another housing project, Affordable Bloomington, was developed. It included affordable housing and a library. Built on nine acres of land owned by the County, near the Valley Boulevard,⁵¹⁷ the project was partly funded by CDBG funds.⁵¹⁸

Overall, the county is 50,000 housing units short of the target provided to it by the State of California. Bloomington needs affordable multi-family housing and also rehabilitation of single-family senior housing so that seniors can continue to age in place. The residential parcels are larger in Bloomington compared to neighboring Fontana and Rialto. So, there is a need to find ways to increase density, for example, by incentivizing ADUs and integrative uses.⁵¹⁹

To promote economic/workforce development, the VCSP highlights the Bloomington Community Plan's goal to promote economic development that is in line with the community's culture.⁵²⁰ Another area that the VCSP identifies as an opportunity for entrepreneurship is providing access to micro-enterprise advisory services. These services could include expert consultation on business development, micro-lending, and tapping grant opportunities.⁵²¹ While the County has not made any grants recently, there are initiatives to support entrepreneurship, such as an online program in English and Spanish to help small businesses with marketing, accounting, etc. The County also hosts a database of various grant opportunities. Furthermore, the Asociación de

⁵¹⁵ San Bernardino County, "San Bernardino County and Related California Open Third Phase of Bloomington Affordable-Housing Community," *San Bernardino County Main*, December 2, 2021, Accessed June 14, 2025, <https://main.sbcounty.gov/2021/12/02/san-bernardino-county-and-related-california-open-third-phase-of-bloomington-affordable-housing-community/>.

⁵¹⁶ Related California, "Bloomington Grove III," *Related California* (2021), accessed June 14, 2025, <https://www.relatedcalifornia.com/our-company/properties/bloomington-grove-iii>.

⁵¹⁷ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 2-11.

⁵¹⁸ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-21.

⁵¹⁹ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁵²⁰ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-5.

⁵²¹ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-5.

Emprendedor@s runs an 8-week-long entrepreneurship program solely in Spanish. Finally, the County provides technical assistance and services to all businesses, including those in Bloomington, and has also conducted periodic surveys to identify ways to help them. It is also exploring options to undertake comprehensive physical and economic development of this area through a mix of services, food (along the lines of Mercado La Paloma food incubator in Los Angeles), and medical technician training facilities (Arrowhead Regional Medical and Kaiser Health are two big medical employers nearby).⁵²²

To promote access to healthy food-based economic development, the VCSP lists the following programs they would consider pursuing: provide farmers, gardeners, and co-op members with a rental communal commercial kitchen to prepare and package food at low hourly rates; support food cooperatives to allow co-op members to make decisions about food sales, and distribution, with the trust that they are more likely to provide consumers with healthy foods; develop community gardens to provide healthier food to the community at a lower cost; support the formation of food clubs where members and families purchase food in wholesale quantities to provide access to below retail priced food to the members of the club; and start a farmer's market where local farmers can sell their produce and provide healthier food options for the community. The farmers can be supported through the County's micro-enterprise and expert support services mentioned above.⁵²³

While VCSP's food-related goals are ambitious, on-the-ground implementation is more modest. Specifically, Bloomington Grove has a food distribution center and the Boys and Girls Club provides health and food education. Finally, the County is also working with several grocers to get a grocery store for Bloomington.⁵²⁴

Focusing on infrastructure development, among others, Representative Pete Aguilar of the U.S. House of Representatives has requested funding for various projects in Southern California for the 2026 fiscal year, two of which are in Bloomington. The first project is the Bloomington Animal Shelter, a \$4 million request that would improve animal care in the community, enhance public safety, and provide job opportunities for residents and neighboring communities. The second project is for the Bloomington Septic Conversion Phase 1 Project, also a \$4 million request, that would install 1,200 feet of mainline sewer along the Valley Boulevard corridor. This sewer extension would improve public health, provide improved wastewater treatment, and encourage economic development.⁵²⁵

⁵²² Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁵²³ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-15.

⁵²⁴ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁵²⁵ Office of Representative Pete Aguilar, "Community Project Funding," Congressman Pete Aguilar (CA-33), accessed June 29, 2025, <https://aguilar.house.gov/community-project-funding/>.

At the county-level, tools primarily focus on housing/homelessness and workforce development. In 2020, San Bernardino County received a \$750,000 Local Early Action Planning (LEAP) grant. The grant funds were used towards the County's 6th Cycle Housing Element, as well as a Sewer Study in Bloomington. The Sewer Study found that areas of Bloomington had zoning that supported new housing without the need for additional incentives. The study also determined that even with up-zoning, some areas of Bloomington would be costly to improve.⁵²⁶

The Housing Authority of the County of San Bernardino (HACSB) manages 99 public housing units and provides over 10,000 housing choice vouchers, as well as LIHTC developments.⁵²⁷ HACSB also offers the FSS program to support families in public housing to save towards leaving public housing by setting aside a portion of their income towards an escrow account. Moreover, HACSB is one of 39 housing authorities that have the designation of being a MTW agency. This designation allows HACSB to provide innovative housing programs to residents.⁵²⁸

Furthermore, San Bernardino County amended their short-term rental ordinance to require properties that are two acres or smaller to have the property owner as an occupant. The purpose of this amendment was to reduce investor-owned rental properties and increase rental housing supply.⁵²⁹ Finally, transitional or permanent housing for veterans and their families are offered by organizations such as U.S. Veterans Inc., Life Community Development, Knowledge and Education for Your Success (KEYS), and Lighthouse Social Services.⁵³⁰

The County has several homeless prevention goals and policies. For example, the San Bernardino County Homeless Partnership between San Bernardino City and County Continuum of Care has goals that align with San Bernardino County's strategic plan for addressing homelessness in the region. A three-year evaluation of the *2009–2019 San Bernardino County 10-Year Strategy to End Homelessness* had the following recommendations: a) Improve the County's Coordinated Entry System (CES) which connects people to housing and services, including support for people with special needs; b) align CES intake and assessments with the Homeless Management Information System; c) have a Central Contact Center for the community to reach out to; d) provide more outreach and services with practitioners and volunteers; and e) prioritize supporting those who

⁵²⁶ San Bernardino County Land Use Services Department, 2024 Countywide Policy Plan: General Plan Annual Progress Report (March 2025), accessed June 29, 2025, 13, https://lus.sbcounty.gov/wp-content/uploads/sites/48/2025_SanBernardinoCountyGeneralPlanAPR_-Final-3_25.pdf.

⁵²⁷ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 239.

⁵²⁸ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 72.

⁵²⁹ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 152.

⁵³⁰ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 102–3.

are homeless that are in the greatest need. These goals are incorporated into the Consolidated Plan.⁵³¹

San Bernardino County also provides housing, mental health, and employment services to support homeless people and San Bernardino County Department of Behavioral Health offers job training and referrals to the State Department of Rehabilitation counselors⁵³² and its Family Assistance Program provides homeless youth transitional and permanent housing.⁵³³

In addition, several non-profit and community-based organizations offer services to support the homeless. For example, Lutheran Services of Southern California supports rural communities in the County with some health services assistance and housing referrals.⁵³⁴ The Inland Valley Hope Partners offers case management, mental health services, and assistance with finding housing and employment.⁵³⁵ Other non-profit and community-based organizations include HACSB, the Time for Change Foundation, Lighthouse Social Services, and New Hope Village.⁵³⁶

The County's Office of Homeless Services (OHS) leads a multidisciplinary team that provides outreach, case management, behavioral health, and housing navigation services to individuals experiencing homelessness throughout the unincorporated areas, including Bloomington. Cedar House Life Change Center, located in Bloomington, also provides treatment and supportive services that complement the County's homeless response efforts.

At this time, there are no plans to establish a dedicated homeless shelter in Bloomington, however. Instead, the County is pursuing a regional approach, exploring opportunities to partner with the City of San Bernardino to share access to its new 200-bed regional navigation center, which will serve the broader region—including Bloomington—by providing temporary housing, stabilization services, and connections to permanent housing.

Additionally, the Bloomington Grove housing development includes Mental Health Services Act (MHSA) units that provide permanent supportive housing for individuals who have experienced homelessness and are receiving ongoing care and case management through the Department of

⁵³¹ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 153.

⁵³² County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 102.

⁵³³ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 103.

⁵³⁴ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 102.

⁵³⁵ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 102.

⁵³⁶ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 102.

Behavioral Health. These units help stabilize vulnerable residents and represent a long-term housing solution integrated within the community.⁵³⁷

Workforce development tools at the county level, including the San Bernardino County Local Workforce Development Plan, have the primary goals of increasing high school graduation rates, providing on-the-job training opportunities, and encouraging residents to pursue college or training programs.⁵³⁸

Similarly, the San Bernardino County Consolidated Plan outlines seven guiding goals, one of which is for cooperating cities to fund services for low-income residents and those with special needs. Other goals include providing support for youth through recreational options, educational support, and job skills training; providing a range of assistance and services to those who are low- to moderate-income and those who have special needs; assisting businesses with employee retention for low- to moderate-earners; and supporting low- to moderate-income residents with educational opportunities, job training, and employment opportunities.

To further mitigate economic disadvantage, the County's Preschool Services Department (PSD) operates Head Start and Early Head Start programs that provide free or low-cost early childhood education to eligible families. The Bloomington Head Start Center offers preschool services for children ages three to five, while Early Head Start supports infants and toddlers through partnerships with licensed family child care providers. Additionally, Volunteers of America Southwest collaborates with PSD to deliver early education and family support services in the Bloomington area as part of the County's Early Head Start network. For school-age children, the Boys & Girls Club at Bloomington Grove offers affordable after-school and summer programming that provides academic support, recreation, and enrichment in a safe, supervised environment.⁵³⁹

Since 2012, San Bernardino County has had a Term-Limited Lease Assistance Program, which provides non-disabled, non-elderly households with rental assistance for a five-year term.⁵⁴⁰ Moreover, term-limited lease assistance residents are offered support through the HACSB Career Development Initiative that assists with employment. HACSB works with the County's Workforce Development and Transitional Assistance Department on placing residents in jobs and job training.⁵⁴¹ Finally, High Desert Homeless Services offers educational and job training services

⁵³⁷ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁵³⁸ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 110–11.

⁵³⁹ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁵⁴⁰ Housing Authority of the County of Santa Barbara, "Types of Affordable Housing," accessed December 8, 2025, <https://hacsb.com/types-of-affordable-housing/>.

⁵⁴¹ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 115.

such as preparing for the GED, computer literacy, assistance with submitting online applications, and financial literacy.⁵⁴²

There are very few county funds to develop housing. San Bernardino County Transportation Authority (SBCTA) is the council of government (COG) for the region and has some planning dollars. It is considering a housing trust fund, although the real emphasis for that fund will be on projects at the intersection of housing and transportation.⁵⁴³

Some Bloomington housing projects use tax credits, such as Bloomington Grove and Las Terrazas. Moreover, the County is working on acquiring a land parcel to develop affordable housing. The parcel is currently used to park diesel trucks. AHSC-type grant funds could be used to develop the site,⁵⁴⁴ though the County staff are not aware of present or past use of AHSC funds for Bloomington.⁵⁴⁵

Table 6.1 notes the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various socio-economic disadvantages.

⁵⁴² County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 102.

⁵⁴³ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁵⁴⁴ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁵⁴⁵ Jeremy Johnson (Engineering Manager, Public Works Department, San Bernardino County), interview by Shishir Mathur, August 21, 2025.

Table 6.1 Bloomington: Strategies to Mitigate Socio-Economic Disadvantage

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
	PDA	County/Regional	State	Federal
Provide affordable housing in high-resource areas.			CalHFA Programs, tax credit program, and affordable housing legislation.	
Provide mixed-income housing in low-income neighborhoods.		SB County consolidated plan Connect SoCal 2024 policies.	CA HCD Infill Infrastructure Grant Program.	LIHTC, CDGB, HOME, and vouchers.
Place-based strategies; for example, investing CDBG and CRA funds in local neighborhoods, other local economic development strategies, such as create jobs, provide job training, increase basic education, implement universal basic income, revitalize neighborhoods, and locate jobs in high-quality communities.	Bloomington County Community Plan; and Valley Corridor Specific Plan.	LEAP Grant SB County Local Workforce Development Plan; SB County Workforce Development Board (SBCWDB); Inland Empire 2021–2024 Regional Workforce Development Plan; SB County Dept of Health (several orgs provide job training); Housing Authority of the County of SB; Connect SoCal 2024 policies; Database of various grant opportunities; Head Start and Early Head Start programs; and Online program for small businesses focused on marketing and accounting.	CARB California Climate Investment funds; CDBG; Workforce Innovation and Opportunity Act (WIOA); State of CA Workforce Development Board’s Unified Strategic Workforce Development Plan; American’s Job Center of California (AJCC); and High Road Training Partnerships.	CRA, CDBG, and SBA loans

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
Reduce disparities in accessing quality health care.	Permanent supportive housing units in Bloomington Grove.	SB County Consolidated Plan; County of SB Department of Mental Health; Inland Empire Health Plan; Programs to Accelerate Transformative Housing (PATH); Boys and Girls Club of Fontana; Inland Valley Hope Partners; and SB County Workforce Development Board (SBCWDB).	CARB California Climate Investments.	
Enhance access to healthy foods.	VCSP goals: co-ops, farmer's market, food club, and wholesale purchases. Food distribution center in Bloomington Grove, and Boys and Girls Club.		SNAP, CNIP, WIC, and Seniors Farmers Market Nutrition Program. Assembly Bill 581: The Healthy Food Financing Initiative.	

6.4 Educational Dimension (sub-dimensions ED1 and ED2)

6.4.1 Summary of disadvantages

Mathur and Ferrell (2024) found that Bloomington has moderate disadvantage on ED1 (overall low level of education) and low disadvantage on ED2 (low-quality K–12 education).⁵⁴⁶ Focusing on ED1, 66.1% of Bloomington residents age 25 and older are high school graduates, while a much smaller proportion, 10.2%, have a bachelor's degree or higher.

The Colton Unified School District serves the residents of Bloomington with public education from kindergarten through 12th grade. The community has access to nearby universities and

⁵⁴⁶ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

community colleges,⁵⁴⁷ such as the University of California, Riverside; California State University, San Bernardino; Loma Linda University; San Bernardino Valley College; and Crafton Hills College.

The California Accountability System measures annual performance of students in 3rd to 8th grade and 11th grade through using either the Smarter Balance Summative Assessment or the California Alternate Assessment methods. The academic performance measures are indicated by very low, low, medium, high, and very high when measuring college and career readiness at grade level. In 2024, the academic performance of Bloomington High School students was mixed. For example, while the students performed at the medium level in English Language Arts, the graduation rate was high at 88.6%, placing Bloomington High School above the state average, and the school performed high in student suspension rates with only 4.2% suspended.

However, student performance was low in Mathematics. Furthermore, only 39.6% of English as a second language (i.e., English Learners) students were making progress towards proficiency in English, and only 34.3% of students were considered prepared for college and career readiness.⁵⁴⁸ Finally, the rate of African American students being suspended was rated as very low performance, meaning they were being suspended at very high rates.⁵⁴⁹

6.4.2 Local tools to mitigate education-related disadvantage

No tools exist at the PDA level and none of the non-PDA tools we found were specifically focused on Bloomington's disadvantaged educational conditions. However, the Colton Joint Unified School District (CJUSD), which serves Bloomington, is in the process of developing a collaborative teacher professional development program (i.e., Certificated Professional Learning Team) for its teachers with the goal of continuous learning for instructional improvements within the district, including mandatory paid time for its educators to pursue the Learning Team's goals.⁵⁵⁰ According to the CJUSD, their curriculum integrates digital tools such as iPads and Chromebooks to personalize learning. Students are required to engage in collaborative learning through Google Workspace to develop research-based presentations and adaptive learning programs. Literacy is fostered through the development of school site-based literacy-focused environments using

⁵⁴⁷ San Bernardino County Land Use Services, *Valley Corridor Specific Plan* (San Bernardino, CA: San Bernardino County, March 2017), 2-10, <https://lus.sbcounty.gov/wp-content/uploads/sites/48/SpecificPlans/ValleyCorridorSPMarch2017web.pdf>.

⁵⁴⁸ California Department of Education, "2024 Academic Performance," California School Dashboard, accessed June 18, 2025, <https://www.caschooldashboard.org/reports/36676863631322/2024/academic-performance>.

⁵⁴⁹ California AfterSchool Network, *State of the State: Expanded Learning in California 2017-2018*, revised March 8, 2019, 8, https://www.afterschoolnetwork.org/sites/main/files/file-attachments/can_sots_expanded_learning_2018_web_revised_3.8.19.pdf.

⁵⁵⁰ Colton Joint Unified School District, "Certificated Professional Learning Team, Professional Learning Commitment," accessed December 15, 2025, <https://resources.finalsite.net/images/v1724880510/coltonk12caus/rhamloncqyqvcviekxyk/PLStatement.pdf>.

research-based teaching methods based on the “Science of Reading.”⁵⁵¹ These methods emphasize structured literacy, focusing on explicit, systematic instruction in phonemic awareness, phonics, fluency, vocabulary, and comprehension.⁵⁵²

The district also developed the CJUSD Multilingual English Learners Institute to enhance literacy and academic achievement for their English as a second language students, providing an annual workshop for teachers to share and develop curriculum focused on these disadvantaged learners.⁵⁵³ The District also provides wrap-around services in the form of after-school programs (funded by a state-funded ASES grant) run in partnership with Think Together, a nonprofit afterschool program provider offering TK–8th grade students with homework assistance and enrichment programs that focus on STEM, Arts, physical activity, and free daily meals.⁵⁵⁴ The Think Together program runs five days a week when school is in session, beginning immediately after dismissal and ending at 6 pm. However, the extent of implementation and the efficacy of these programs are unknown.

The county-wide tools primarily focus on providing employment opportunities through education and training. For example, San Bernardino County receives funding through WIOA. This requires SBCWDB to have a Local Workforce Development Plan that aligns with the Inland Empire 2021–2024 Regional Workforce Development Plan and the State of California Workforce Development Board’s Unified Strategic Workforce Development Plan. Their shared vision is to provide a workforce development system that supports businesses, employees, and those pursuing employment.⁵⁵⁵ Through stakeholder and community engagement, the SBCWDB created five goals: (1) Sector-Based Career Pathways: Specific to transportation/logistics, manufacturing, healthcare and social assistance, construction and professional services, with a consideration for any new sectors; (2) High Road Workforce System: Form partnerships to support high road job opportunities and collaborate with AJCC (a no-cost job training and job

⁵⁵¹ Colton Joint Unified School District, “The Elementary Curriculum & Instruction Department,” accessed December 15, 2025, <https://www.cjUSD.net/departments-services/educational-services-division/curriculum-elementary#:~:text=Teachers%20integrate%20digital%20tools%20seamlessly%2C,skills%20with%20adaptive%20learning%20programs>.

⁵⁵² Jacquelyn Chovanes and Emily Sharp, *Structured Literacy: Teaching K–12 Students to Read Using the Science of Reading and Explicit Instruction* (Bloomsbury Publishing, February 2025).

⁵⁵³ Colton Joint Unified School District, “Equity & Access,” accessed December 15, 2025, <https://www.cjUSD.net/departments-services/educational-services-division/school-improvement-accountability/equity-access>.

⁵⁵⁴ Colton Joint Unified School District, “Expanded Learning (Think Together),” accessed December 15, 2025, <https://www.cjUSD.net/for-families/expanded-learning-think-together#:~:text=The%20program%20offers%20TK%2D8th%20grade,a%20student's%20regular%20school%20day>.

⁵⁵⁵ San Bernardino County Workforce Development Board, *San Bernardino County Local Workforce Development Plan, 2021–2024*, (April 20, 2021), accessed July 14, 2025, 3, <https://wp.sbcounty.gov/workforce/wp-content/uploads/sites/5/2021/08/SB-Local-Plan-FINAL.pdf>.

network);⁵⁵⁶ (3) Access and Inclusion for All: Through partnerships with AJCC and other partners, provide access to digital literacy and programs that are relevant and supportive of specific populations to promote equity; (4) Future of Work: Evaluate programs to be up to date with current trends in the workforce and economy; and (5) Response to COVID-19: County response to change and adaptation that came from COVID-19's impact.⁵⁵⁷

Furthermore, competitive Integrated Employment (CIE) is a work setting where people with intellectual or developmental disabilities are working alongside people with and without disabilities. SBCWDB works with the Inland Empire Local Partner Collaborative (IELPC) for CIE. IELPC works with SBCWDB on CIE to provide opportunities for those with intellectual and developmental disabilities.⁵⁵⁸

Finally, SBCWDB provides services to all five of the following Adult Education Program Consortia in the county: Inland Adult Education Consortium, West End Corridor/Chaffey Regional AE Consortium, Victor Valley Adult Education Regional Consortium, Barstow Area Consortium for Adult Education, and Morongo Basin AEBG Consortium.⁵⁵⁹

Tables 6.2 and 6.3 note the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various education-related disadvantages.

⁵⁵⁶ Employment Development Department, "America's Job Center of California," Jobs and Training, accessed July 14, 2025, https://edd.ca.gov/en/jobs_and_training/TCLobby/.

⁵⁵⁷ San Bernardino County Workforce Development Board, *San Bernardino County Local Workforce Development Plan*, 3.

⁵⁵⁸ San Bernardino County Workforce Development Board, *San Bernardino County Local Workforce Development Plan*, 17.

⁵⁵⁹ San Bernardino County Workforce Development Board, *San Bernardino County Local Workforce Development Plan*, 17.

Table 6.2 Bloomington: Strategies to Improve Education at the Community Level

Literature	Used/noted in local, regional and state plans		
	PDA	County/Regional	State
Labor-market relevant educational programs and partnerships with employers to develop educational programming. ⁵⁶⁰		SB County Consolidated Plan – educational supports and jobs skills training.	High Road Training Partnership; America’s Job Center for California (AJCC); and CAEP; College and Career Access Pathways Grant.
Targeted outreach to early school leavers, adults, racial minorities, and other socio-economically disadvantaged populations. ⁵⁶¹		SB County Local Workforce Development Plan; SB County Workforce Development Board (SBCWDB); Inland Empire 2021–2024 Regional Workforce Development Plan; SB County Dept of Health (several orgs provide job training); SB County Consolidated Plan – educational supports and jobs skills training; SB County Dept of Behavioral Health – job training; Inland Valley Hope Partners – employment assistance for those who are homeless; High Desert Homeless Services – job training, computer literacy, resume support, etc.; and Knowledge and Education for Your Success (KEYS).	High Road Training Partnership; and California State Library’s LTSA Community Impact Grants – fund local projects and community needs.
Financial assistance and online/hybrid classes. ⁵⁶²		Connect SoCal 2024 broadband policies.	
Local/community learning centers.	Bloomington Library.	High Desert Homeless Services, such as resume building, job training, and budgeting seminars.	America’s Job Center for California (AJCC); High Road Training Partnerships; CAEP; and CCAP.
Guidance and counseling services.		SB County Dept of Behavioral Health – referrals to State Dept of Rehabilitation counselors.	

⁵⁶⁰ Broek and Hake, “Increasing Participation of Adults in Higher Education.”

⁵⁶¹ Broek and Hake, “Increasing Participation of Adults in Higher Education.”

⁵⁶² Broek and Hake, “Increasing Participation of Adults in Higher Education.”

Table 6.3 Bloomington: Strategies to Improve the Quality of K–12 Education

	Used/noted in local, regional, state, and federal plans				
	PDA	City/County	Regional	State	Federal
Improving teachers' quality: higher teacher salary, professional development opportunities, and performance-based pay. ⁵⁶³		CJUSD Professional Learning Commitment; and CJUSD Multilingual English Learners Institute.			Title II, Part A.
Core instructional strategies: evidence-based literacy instruction, ⁵⁶⁴ personalized/individualized learning models, ⁵⁶⁵ inquiry-based and active learning, ⁵⁶⁶ and targeted interventions and data-driven adjustments. ⁵⁶⁷		CJUSD personalized tech-centered literacy program and "Science of Reading" philosophy.		California School Dashboard; and Universal Transitional Kindergarten (UTK).	Title III, Part A.
Systemic and equity-focused reforms: school finance reform, ⁵⁶⁸ standards-based reform (SBR), ⁵⁶⁹ strengthening college and career		CJUSD Multilingual English Learners Institute.		Local Control and Accountability Plan (LCAP); Community Schools Partnership Program; California Universal Meals	Title I, Part A; Title IV, Part A: Student Support and Academic Enrichment (SSAE) Grants; Individuals with Disabilities Education Act

⁵⁶³ Thomas C. Dawson and K. Lloyd Billingsley, *Unsatisfactory Performance: How California's K–12 Education System Protects Mediocrity and How Teacher Quality Can Be Improved* (September 2000), <https://eric.ed.gov/?id=ED453152>.

⁵⁶⁴ Education Northwest, "Literacy Lens: Effective Literacy Practices for Secondary Students," accessed December 8, 2025, <https://educationnorthwest.org/insights/literacy-lens-effective-literacy-practices-secondary-students>.

⁵⁶⁵ Stand Together, "7 Student-First Solutions for Education That Can Make a Difference," accessed December 8, 2025, <https://standtogether.org/stories/education/ways-to-improve-the-quality-of-education-in-the-us>.

⁵⁶⁶ Moreno, "K–12 Science Education Reform."

⁵⁶⁷ Hanover Research, "8 Ways to Close the Achievement Gap in Schools."

⁵⁶⁸ Kirst, "Standards-Based Education Reforms."

⁵⁶⁹ Kirst, "Standards-Based Education Reforms."

	Used/noted in local, regional, state, and federal plans				
pathways, ⁵⁷⁰ and equitable use of technology. ⁵⁷¹				(UMP); Summer Matters Campaign; After School Education and Safety (ASES); Charter School Facility Grant Program; (SB740); Public Charter Schools Grant Program (PCSGP); College and Career Access Pathways Grant; and California Adult Education Program (CAEP).	(IDEA); and Perkins Career and Technical Education Act.
Supporting the whole child and community: whole-child approaches and wraparound services, ⁵⁷² fostering school connectedness and positive climate, ⁵⁷³ and partnerships and community engagement. ⁵⁷⁴		CJUSD partners with Think Together, homework assistance and enrichment programs, and free daily meals.		California Universal Meals (UMP); California State Preschool Program (CSPP); and After School Education and Safety (ASES).	Title IV, Part A: Student Support and Academic Enrichment (SSAE) Grants; Individuals with Disabilities Education Act (IDEA); Head Start; Child and Adult Care Food Program (CACFP); National School Lunch Program (NLSP); and School Breakfast Program (SBP).

⁵⁷⁰ James, “K–12 Education.”

⁵⁷¹ James, “K–12 Education.”

⁵⁷² James, “K–12 Education.”

⁵⁷³ Robert Balfanz, Angela Jerabek, Krystal Payne, and Jenny Scala, “Strengthening School Connectedness to Increase Student Success,” *EdResearch for Action*, Overview Brief no. 29 (May 2024), accessed December 8, 2025, <https://edresearchforaction.org/research-briefs/strengthening-school-connectedness-to-increase-student-success/>.

⁵⁷⁴ Hanover Research, “8 Ways to Close the Achievement Gap in Schools.”

6.5 Environmental Dimension (sub-dimensions EN1, EN2, and EN3)

6.5.1 Summary of disadvantages

According to Mathur and Ferrell (2024), while Bloomington has moderate levels of air pollution (EN1), it is not in the top quartile for the state. It has no disadvantage for ground pollution (EN2), and there are low levels of children's lead risk exposure from housing (EN3).⁵⁷⁵

However, CalEPA identifies Bloomington as a disadvantaged community, placing the community in the top quartile of CalEnviroScreen's scoring for disadvantaged communities.⁵⁷⁶ Specifically, CalEnviroScreen places Bloomington in the 81st percentile for asthma, 80th percentile for low birth weight, 87th percentile for cardiovascular disease, and 91st percentile for pollution burden.⁵⁷⁷

Furthermore, Bloomington has been identified as an environmental justice community under Assembly Bill 617.⁵⁷⁸ AB 617 requires CARB to identify communities and conduct air monitoring and community-based planning. Priority is given to the most impacted disadvantaged communities.⁵⁷⁹

Bloomington residents are exposed to particulate matter and diesel emissions from warehouses and transportation logistics-related businesses. Air quality has gotten gradually worse in the community with the increase in warehouses in the area,⁵⁸⁰ which can be attributed to the post-COVID-19 increase in e-commerce. These warehouses have created poor air quality and health impacts on residents in nearby communities. The impacts on respiratory, reproductive, and cardiac health are made worse by the geographical valleys of the various communities in the Inland Empire that spatially concentrate pollutants.⁵⁸¹

⁵⁷⁵ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

⁵⁷⁶ Office of Environmental Health Hazard Assessment, *CalEnviroScreen 4.0 map* (accessed November 10, 2025), <https://oehha.maps.arcgis.com/apps/View/index.html?appid=c3e4e4e1d115468390cf61d9db83efc4>.

⁵⁷⁷ California Air Resources Board, Community Air Monitoring Plan for Bloomington, Fontana, Rialto (CAMP), Statewide Mobile Monitoring Initiative, accessed July 9, 2025, 12, <https://7319524.fs1.hubspotusercontent-na1.net/hubfs/7319524/SMMI%20CAMPS%20-%20English/Bloomington%2C%20Fontana%2C%20Rialto%20CAMP.pdf>.

⁵⁷⁸ South Coast Air Quality Management District, Year 2 Community Recommendations for AB 617 Implementation, accessed June 29, 2025, 13, https://www.aqmd.gov/docs/default-source/ab-617-ab-134/year-2/community-identification-prioritization/final-submittal-year-2.pdf?sfvrsn=22f1c261_8.

⁵⁷⁹ South Coast Air Quality Management District, Year 2 Community Recommendations for AB 617 Implementation, 13.

⁵⁸⁰ Clarity Movement Co., "The Crucial Role of Environmental Justice Communities to Improving Air Quality in California under AB 617," Clarity Movement Co. Blog, June 21, 2021, <https://www.clarity.io/blog/role-of-environmental-justice-communities-to-improving-air-quality-in-california-under-ab-617>.

⁵⁸¹ Amparo Muñoz (CCA EJ), Susan Phillips (RRC), and Mary Ann Ruiz (Sierra Club), *A Region in Crisis: The Rationale for a Public Health State of Emergency in the Inland Empire* (San Bernardino, CA: Center for Community Action and

In 2018, homes in the community were demolished to build a 677,000 square foot warehouse. A 344,000 square foot distribution center was built about a mile away. Rialto, a neighboring city, built a 2.2 million square foot warehouse. Residents are concerned about the impact of these facilities near their neighborhoods and schools. Residential areas have been rezoned for commercial use, even when met with community opposition.⁵⁸²

Furthermore, warehouses increase the heat island effect due to the reduction of green and open spaces. Some of the major businesses that exist in the Inland Empire are GEODIS Warehouse, Kellogg's APL Logistics, FedEx Supply Chain, and Amazon LGB8.⁵⁸³

Apart from air pollution and truck traffic, light and noise pollution from warehouses and an outdated electric grid are big problems. Power outages are common, some lasting up to two days. The electric system is being upgraded at a very slow pace of a mile per year. South Bloomington (south of I-10) also lacks a cooling or community center to visit during power outages. Moreover, parts of Bloomington and Rialto surrounding south Bloomington are primarily zoned industrial with a heavy concentration of recycling centers and warehouses, many of which abut Bloomington. While parts of the same cities abutting north Bloomington are residential, these cities' land uses have an overflow effect on Bloomington.⁵⁸⁴

Furthermore, the County has laid the sewer lines to the adjoining streets in some places but left it to the individual households to connect to it, which is a big expense for many residents. Private developers use piped sewer as a selling point. But many households prefer private septic tanks as a way of discouraging new development and preserving the community's rural character.⁵⁸⁵

Finally, homes built before 1980 and inhabited by children under six are at higher risk of lead exposure. In San Bernardino County, approximately 18% of owner-occupied homes and 14% of renter-occupied homes were built before 1980.⁵⁸⁶

Environmental Justice, January 2023), 1,

<https://www.reginfo.gov/public/do/eoDownloadDocument?pubId=&eodoc=true&documentID=223796>.

⁵⁸² Orlando Mayorquin, "When a Package at the Front Door Means a Warehouse Next Door," CalMatters, updated February 19, 2021, <https://calmatters.org/california-divide/2021/02/when-a-package-at-the-front-door-means-a-warehouse-next-door/>.

⁵⁸³ California Air Resources Board, Community Air Monitoring Plan for Bloomington, Fontana, Rialto (CAMP), 13–14.

⁵⁸⁴ Joaquin Castillejos (Organizing Leader, CCAEJ), interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁵⁸⁵ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁵⁸⁶ San Bernardino County Community Development and Housing Agency, 97.

6.5.2 Local tools to mitigate environmental disadvantages

Local tools to mitigate air pollution

The Bloomington, Fontana, Rialto Community Air Monitoring Plan (CAMP) is under the Statewide Mobile Monitoring Initiative (SMMI), which is a CARB project. The SMMI's focus is on better air quality monitoring in 64 Consistently Nominated Communities (CNC), which are communities that have been identified for air protection programs. The CAMP is a plan to guide air monitoring in Bloomington, Fontana, and Rialto and support future plan development. The CAMP was developed with the input of and in continued collaboration with the community.⁵⁸⁷ Indeed, community members guided the plan's development with their personal lived experiences.⁵⁸⁸

Under this program, air quality is monitored along Baseline Avenue—a major transportation corridor in this area. The study area was selected based on feedback from Bloomington, Fontana, and Rialto residents who were concerned about heavy traffic on this corridor.⁵⁸⁹ Air quality data will be collected by Aclima (a California Public Benefit Corporation⁵⁹⁰) in the study area across different times of day. California Center for Community Action and Environmental Justice (CCEAJ) and IQAir, an air quality technology company, have partnered to place 45 air quality monitors in the homes of Bloomington, Fontana, and Rialto residents.⁵⁹¹ To date, air monitors have been installed in 30 homes. All 45 households have signed up. The rest of the installations will be done by IQAir. The air quality monitoring dashboard is up and running, displaying data from the existing monitors. CCEAJ also worked with Aclima under a state-wide mobile air monitoring initiative with Aclima's cars driving through the county. The County has its own mobile air monitoring through Aclima in Bloomington, Fontana, and Rialto.⁵⁹²

However, air quality is still very poor in Bloomington. Residents need to plan their daily physical activities because of bad air quality. There are few publicly accessible, stationary air monitors and most of the air quality data are model-generated. In general, Bloomington needs more comprehensive air monitoring.⁵⁹³

Moreover, in June 2024, environmental groups Earthjustice and People's Collective for Environmental Justice filed a complaint with the federal government over concerns about warehouse and distribution facilities being built in San Bernardino County. The complaint noted that a disproportionate number of these facilities were being built in Hispanic/Latino

⁵⁸⁷ California Air Resources Board, Community Air Monitoring Plan for Bloomington, Fontana, Rialto (CAMP), 3.

⁵⁸⁸ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁵⁸⁹ California Air Resources Board, Community Air Monitoring Plan for Bloomington, Fontana, Rialto (CAMP), 30.

⁵⁹⁰ California Air Resources Board, Community Air Monitoring Plan for Bloomington, Fontana, Rialto (CAMP), 3.

⁵⁹¹ IQAir, "About IQAir," accessed July 15, 2025, <https://www.iqair.com/about-iqair>.

⁵⁹² Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁵⁹³ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

communities, exposing residents to air pollution. Additionally, these facilities negatively impact housing and equity in these communities.⁵⁹⁴ The complaint was filed under Title VI of the Civil Rights Act of 1964, which prohibits federally-funded or assisted projects from discriminating based on race or country of origin.⁵⁹⁵

In January 2024, the San Bernardino County Board of Supervisors approved a 260,000-square-foot warehouse to be built in Bloomington. The Colton Joint Unified School District filed a lawsuit in February, alleging that the County failed to conduct a sufficient environmental review. The warehouse location was planned to be 330 feet from Bloomington High School.⁵⁹⁶

Earlier, CCAEJ and Earthjustice sued San Bernardino County supervisors and the Slover Distribution Center developers for the 334,000 square foot warehouse in Bloomington. The warehouse is next to a residential area and a high school. The two groups state that insufficient action was taken to reduce the impact of air pollution.⁵⁹⁷

Indirect sources of pollution, such as the impact of truck traffic from warehouses, are a concern too. Regulating emissions from warehouses can be challenging because warehouses may not be the source of pollution, but the trucks and roads that serve them are. CCAEJ collaborated with coalition partners and community members on the Indirect Sources Rule (ISR) to better regulate warehouses in Southern California. Their primary goal was to have the South Coast Air Quality Management District (SCAQMD) adopt the rule, which was achieved in 2021. Rule 2305, Warehouse ISR, requires warehouses of 100,000 square feet or more to reduce emissions by increasing the use of zero-emissions trucks, investing in zero-emissions equipment, and installing solar panels. Warehouses that do not comply with these expectations would be charged fees.⁵⁹⁸

Furthermore, in 2020, rolling blackouts prompted the California Public Utilities Commission (CPUC) to hold a proceeding. The blackouts disproportionately impacted disadvantaged communities. CCAEJ partnered with CEJA, the Sierra Club, and community members by

⁵⁹⁴ Rebecca Plevin, “Complaint Alleges Inland Empire Community Is Being Disproportionately Targeted for Warehouse Development,” *Los Angeles Times*, July 3, 2024, <https://www.latimes.com/california/story/2024-07-03/complaint-alleges-inland-empire-community-is-being-disproportionately-targeted-for-warehouse-development>.

⁵⁹⁵ U.S. Department of Justice, Civil Rights Division, Federal Coordination and Compliance Section, “Overview of Title VI,” Title VI of the Civil Rights Act of 1964, accessed June 19, 2025, <https://www.justice.gov/crt/fcs/TitleVI>.

⁵⁹⁶ Plevin, “Complaint Alleges Inland Empire Community Is Being Disproportionately Targeted for Warehouse Development.”

⁵⁹⁷ Kevin Stark, “Amid E-Commerce Surge, California Cities Want Relief from Truck Pollution, The Greenlining Institute, March 14, 2019, <https://greenlining.org/2019/amid-e-commerce-surge-california-cities-want-relief-truck-pollution/>.

⁵⁹⁸ California Environmental Justice Alliance, “Fighting Toxic Pollution: The Indirect Sources Rule,” California Environmental Justice Alliance Green Zones, accessed June 26, 2025, <https://ceja.org/what-we-do/green-zones/fighting-toxic-pollution-the-indirect-sources-rule/>.

participating in CPUC proceedings to push the CPUC toward a renewable energy grid. CCAEJ successfully encouraged and organized community members to push CPUC to adopt higher GHG reduction goals.⁵⁹⁹

Moreover, CCAEJ has rallied the community to participate in city council, planning commission, and community meetings to express concerns about decisions to build warehouses in and near their community. A similar coalition exists in the neighboring City of Fontana.⁶⁰⁰

Finally, in 2024, a Superior Court judge ruled that San Bernardino County violated the California Environmental Quality Act (CEQA) by approving the Bloomington Business Park Specific Plan (BPSP). The warehouse plan would bring pollution to the community, with an estimated 1,300 diesel truck trips per day required for the project. The court found the County's environmental assessment inadequate and that a new environmental impact report was needed. The BPSP would displace over 100 households and expose many others to construction pollution. The area of development by BPSP is referred to as the "diesel death zone" due to pollution from nearby warehouses and other developments. San Bernardino County and Riverside County, also known as the Inland Empire, combined went from 162 warehouses to 4,299 between 1975 and 2021. The Inland Empire is in proximity to the Ports of Los Angeles and Long Beach. Over 40% of goods that are distributed to the rest of the country move through the Inland Empire.⁶⁰¹

It is, however, a tough battle. Elected officials and unions oppose CCEAJ's views—the former view warehouses as bringing jobs. Warehouses ISR passed in 2022 and, after litigation, was implemented in 2024.⁶⁰² However, the ISR has a significant number of violators of Rule 2305. Basically, they are out of compliance for not paying the fees. The warehouses will, for example, agree to adopt EV trucks as a mitigation measure but later fail to implement it, citing a lack of fast, efficient charging stations. Indeed, there are not enough charging stations consistently located along truck routes.⁶⁰³

In 2024, assembly member Eloise Reyes helped pass AB 98, the Planning Logistics and Neighborhood Standards Act (P.L.A.N.S.). This legislation puts in place standards to address the

⁵⁹⁹ California Environmental Justice Alliance, "Fighting Toxic Pollution."

⁶⁰⁰ California Environmental Justice Alliance, "Fighting Toxic Pollution."

⁶⁰¹ Earthjustice, "Judge Orders San Bernardino County to Redo Environmental Review of Bloomington Business Park," press release, September 24, 2024, accessed June 29, 2025, <https://earthjustice.org/press/2024/judge-orders-san-bernardino-county-to-redo-environmental-review-of-bloomington-business-park>.

⁶⁰² Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁶⁰³ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

impacts of the logistics industry on sensitive receptors, which include schools, homes, and daycare centers.⁶⁰⁴

However, the truck routes are being rerouted through major arterial roads under AB 98. Schools are also often on such roads. There are two such schools in Bloomington. Despite parents' complaints and clear danger to kids, the local governments are not sensitive to these safety and pollution concerns.⁶⁰⁵ As a result, pollution has not decreased overall in Bloomington. Warehouses approved in the last 2–3 years are still being built. As of now, they are partially built. When complete, pollution will increase further. For example, West Valley Logistics Center, a 3.1-million-sq.-ft. warehouse, located in Fontana but adjacent to Bloomington, is still under construction. CCAEJ advocates for the following mitigation measures: (1) stop all warehouse development within 1,000 feet of all schools, parks, residences, and other sensitive areas; (2) develop a clear path forward for the electrification of trucks, trains, and automobiles; and (3) implement mitigation measures for amenities next to warehouses. Such measures include trees and buffer zones.⁶⁰⁶

Furthermore, an EJ advocate noted that the community was more hopeful before the current federal administration. Now, many initiatives are on hold or have been cancelled. For example, the Ports ISR is now being proposed as an MOU. The same industries (for example, metal shredding operations and railroads) that have done very little to reduce their air pollution emissions are asked in the MoU to take air pollution mitigation measures voluntarily.⁶⁰⁷ The advocate also noted that the community needs air monitors installed and monitored by the community or local CBOs. Personal air monitoring is needed to understand the amount of exposure to poor air quality throughout the day. Only then will the community have access to the data they need to support policy changes.⁶⁰⁸

The EJ advocate also pointed out that the Board of Supervisors and the local cities are attracting warehouses along freeways such as I-215, I-15, and I-10, even though they are aware of the negative environmental impacts of such uses. In fact, in some cases, recreational uses are being rezoned to industrial uses. The community doesn't want the transportation corridors that the County and others are planning. They are planning these corridors quietly, without following the proper environmental procedures in place to protect communities.⁶⁰⁹ Providing a few examples,

⁶⁰⁴ Assembly Member Juan Carrillo, Assembly District 39, "Assemblymembers Reyes and Carrillo Celebrate Signing of AB 98," accessed December 09, 2025, <https://a39.asmdc.org/press-releases/20240930-assemblymembers-reyes-and-carrillo-celebrate-signing-ab-98>.

⁶⁰⁵ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

⁶⁰⁶ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁶⁰⁷ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

⁶⁰⁸ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

⁶⁰⁹ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

the EJ advocate notes that the lawsuits related to the Bloomington Business Park Specific Plan challenged the underlying data analysis. The judge sent the Plan back to the developers for revisions, leading to a revised draft EIR. Furthermore, CCAEJ and the community challenged the Inland Valley Development Agency's (IVDA) Inland Valley Infrastructure Corridor (IVIC) project, which was then cancelled. Finally, CCAEJ and the community are also challenging a MoU for a warehouse in Highland, CA. The EJ advocate notes that while these processes are supposed to engage the community, which the responsible agencies claim they do, the community engagement rarely occurs. Notices often go to land owners/landlords only and do not reach the tenants.⁶¹⁰ Finally, the community is struggling to get community benefit agreements with government and businesses for new/existing development.⁶¹¹

Reacting to the presence of Connect SoCal 2024's air-quality and clean-transportation-related policies (see Chapter 3.3.3 for the list of policies), CCAEJ noted that these policies have not been implemented in Bloomington; and on a larger note, SCAG does little for Bloomington. For example, it does not push local governments or local policies for reducing air pollution. SCAQMD and local organizations such as CCAEJ are the main actors advancing such policies, which local governments would often oppose. For example, gas-powered boilers and heaters are a major source of NOx pollution. Many local governments opposed their conversion to electric power.⁶¹² Another EJ advocate also noted that the cities and county governments are not supportive of EJ efforts to mitigate air pollution. In fact, they often avoid EJ advocates and exclude their voices on committees.⁶¹³

Furthermore, one EJ advocate noted that Bloomington suffers from frequent blackouts with no power back-up systems. Finally, very few EV chargers exist, and those that do are the slow-charging ones.⁶¹⁴

Reacting to the impact of state air pollution mitigation strategies, such as Cap-and-Trade Program funds, designation of Bloomington as a SB 535 community, CARB's Advanced Clean Fleet and other regulations, and various CARB's plans and strategies, the EJ advocates interviewed for this research noted they have not seen any implementation of these tools in Bloomington, and some regulations are on hold or withdrawn with the change in the federal administration;⁶¹⁵ however, due to the community's AB 617 designation, the County identified Bloomington as an EJ focus area and developed guidelines that require developers to have more community meetings to

⁶¹⁰ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

⁶¹¹ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

⁶¹² Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁶¹³ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

⁶¹⁴ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

⁶¹⁵ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025; Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

solicit community feedback and to inform a larger area (2,500 feet radius compared to 1,000 feet) about the proposed development. But these guidelines have not created any change.⁶¹⁶ Please see Chapter 3.3.2 for a full list of state-level tools to mitigate air pollution.

Finally, reacting to the use of federal programs, such as, the Climate Pollution Reduction Grants (CPRG) program that allocates close to \$5 billion in grants for states, local governments, tribes, and territories to enact plans that reduce GHG emissions,⁶¹⁷ an EJ advocate noted that it is unclear whether Bloomington received these grants.⁶¹⁸

Local tools to mitigate ground pollution

In 2003, Fontana, Bloomington, Colton, and Rialto had a combined 20 perchlorate-contaminated water wells that needed to be shut down. Over half of the population in these communities is Latino.⁶¹⁹ Perchlorate is a salt used in rocket fuel that is harmful to humans. The military and defense contractors, such as the Air Force, NASA, Lockheed Martin, and Aerojet, have been the sources of the perchlorate contamination in the area. In 1999, there was a major clean-up in both San Bernardino County and Sacramento County.⁶²⁰ Although it is not clear whether the perchlorate-contaminated wells have been shut down, the community members complain about groundwater contamination.⁶²¹ Furthermore, neighboring Colton has a few polluting metal shredders, and DTSC found that they exceeded the permissible pollution levels for copper, lead, and zinc. Finally, the local airport was an air force base previously and the community has heard that the groundwater in that area has a foul odor and is often brown in color.⁶²²

Local tools to mitigate lead exposure

San Bernardino County adheres to the HUD Lead Safe Housing Rule in federally funded affordable housing developments. The County provides community education on the lead risk to children, home screening, case management, monitoring, and lead testing in high-risk children through the Childhood Lead Poisoning Prevention program.⁶²³ The County plans to continue inspections

⁶¹⁶ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁶¹⁷ U.S. Environmental Protection Agency, Climate Pollution Reduction Grants, last modified March 1, 2024, accessed April 4, 2025, <https://www.epa.gov/inflation-reduction-act/climate-pollution-reduction-grants>.

⁶¹⁸ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁶¹⁹ Natural Resources Defense Council, “Hidden Danger: Environmental Health Threats in the Latino Community,” October 2004, https://www.nrdc.org/sites/default/files/latino_en.pdf.

⁶²⁰ California Environmental Justice Alliance, “Thirsty for Justice: A People’s Blueprint for California Water,” accessed July 3, 2025, 74, <https://www.issuelab.org/resources/2885/2885.pdf>.

⁶²¹ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁶²² Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

⁶²³ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 156.

and remediation.⁶²⁴ However, the community is largely unaware of these programs. Old houses are being demolished to construct warehouses. So, lead and asbestos pollution is a big concern.⁶²⁵

However, a community-based organizer noted a lack of awareness of the state and federal lead-abatement programs. They are also unsure how to obtain the educational materials and noted that the community is composed of many immigrants. The organizer further noted that it is hard to gain the community's trust in these times because, due to the current immigration actions, people are hesitant to open their doors for information, and organizers and volunteers are hesitant to canvass neighborhoods to provide it.⁶²⁶ Finally, they point that a community does not just need information; it needs actual financial assistance, for example, to paint houses with lead-free paint. Unfortunately, the organizer noted, "we're tearing down homes instead of building them."⁶²⁷

Moreover, macro strategies suggested in the literature to mitigate lead exposure—removing structural racism, creating jobs, developing small businesses, providing affordable housing, and improving social cohesion—are lacking in Bloomington. The community needs both rental and owner-occupied affordable housing, as well as local economic development initiatives such as job training centers. Several community members attend local universities and then leave the region because of a lack of local jobs. Moreover, small business development initiatives are not coming from local governments but from small businesses themselves, who have created the Bloomington Chamber of Commerce. Other partner non-profits, such as the Hispanic Coalition of Small Businesses, provide technical training and advocacy. Finally, warehouses are displacing many small businesses by directly buying lots where the small businesses operate, and also because, with the rural character of the community disappearing, several rural lifestyle-focused small businesses, such as those related to feeding livestock, and those equestrian-related, are shutting down.⁶²⁸

Tables 6.4, 6.5, and 6.6 note the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various environmental disadvantages.

⁶²⁴ County of San Bernardino, Department of Community Development and Housing, *2020–2025 Consolidated Plan*, 254.

⁶²⁵ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

⁶²⁶ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

⁶²⁷ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

⁶²⁸ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

Table 6.4 Bloomington: Strategies to Mitigate Groundwater Pollution

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
	PDA	County/Regional	State	Federal
Proper landfill design.	There is a Burrtec waste management facility in South Bloomington, but it is very far from residential areas with warehouses in between as a buffer. So, have not heard any complaints about pollution from landfills. ⁶²⁹			
Laws and penalties to prevent contamination.			GAMA	NPDES: requires a permit for wastewater discharge.
Identify and isolate contaminated zones.	There is a need for that but has not happened in Bloomington. ⁶³⁰	SB County had major perchlorate clean up in 1999.		
Prevent soil erosion.	Not an issue in Bloomington. ⁶³¹			
Reduce sediment-containing surface runoff.	Not an issue in Bloomington. ⁶³²			
Monitoring and inspection of polluting sources (e.g., septic, fuel, and chemical tanks).	A minor issue in Bloomington. ⁶³³		GAMA; AB 2722 – reduce pollution.	NPDES: quality and monitoring requirements.

⁶²⁹ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁶³⁰ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

⁶³¹ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁶³² Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁶³³ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
Control uses in the aquifer recharge areas.	Not an issue in Bloomington. ⁶³⁴			
Educational campaigns.		CCA EJ – public education through advocacy.		
Prevent Sea level rise.	NA			

Table 6.5 Bloomington: Strategies to Mitigate Children’s Exposure to Lead

Literature	Used/noted in local, regional and state plans		
	PDA	County/Regional	State
Strong lead poisoning prevention programs– universal screening and public education.	No. ⁶³⁵	SB County follows HUD Lead Safe Housing Rule.	Childhood Lead Poisoning Prevention Acts; Residential Lead-Based Paint Hazard Reduction Act; and State civil and health codes: buildings with lead hazards are in violation of State housing laws.
Identify and eliminate sources of lead contamination (e.g., paint and water pipes).	No. ⁶³⁶	SB County provides community resources through Childhood Lead Poisoning Prevention Program.	Childhood Lead Poisoning Prevention Acts.
Remove structural racism: job creation; small business development; affordable housing; and improved social cohesion.	See tools under Socio-economic dimension.		

⁶³⁴ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁶³⁵ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁶³⁶ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

Table 6.6 Bloomington: Strategies to Mitigate Air Pollution

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
	PDA	County/Regional	State	Federal
Legislation (e.g., U.S. Clean Air Act); emission taxes; and policies and programs.	No evidence.	CCA EJ Indirect Sources Rule (adopted by SCAQMD); and Connect SoCal 2024 air quality and clean transportation related policies.	AB 617; SB 535; and CARB policies.	Clean Air Act; and EPA programs.
Economic tools and incentives: subsidies for pollution abatement; and emissions trading, banking, and caps.	No.	SBCTA VMT Mitigation Bank.	Cap and Trade; CARB – Funding Guidelines; and AB 1550.	Congestion Mitigation and Air Quality Funds; and Climate Pollution Reduction Grants.
Enhanced air pollution monitoring and modeling.		Bloomington, Fontana, Rialto Community Air Monitoring Program (CAMP) under Statewide Mobile Monitoring Initiative (SMMI); and CCA EJ and IQair monitoring.	CARB policies; and AB 398.	EPA Ambient Air Monitoring.
Road-side vegetation; greening.	VCSP – landscaping on corridor. But not implemented, ⁶³⁷ because of the long-term maintenance commitment. ⁶³⁸			
Reduce emissions by transport sector: promote	VCSP – reduce car dependency. Omnitrans is	Connect SoCal clean transportation policies.	CARB policies and programs;	Congestion Mitigation and Air

⁶³⁷ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁶³⁸ Montes, interview by Shishir Mathur and Christopher Ferrell, September 4, 2025.

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
electrification and EVs; dissuade auto use; promote non-auto use; and higher emissions and fuel standards.	trying to push public transit a bit. They have a dial-a-ride program like an Uber. Overall, there is a decrease in public transportation. It is difficult to ride bikes because of trucks on the roads. Not enough advocacy around electrification projects. ⁶³⁹		State laws, such as SB 535, AB 617, AB 398, EAP, and AB 1358.	Quality Funds; and Clean Air Act.
Reduce emissions by the energy sector: clean and renewable energy sources; cleaner industrial production; higher emission standards; monitoring of air pollution by industries; and elimination/relocation of polluting industries.	There is a Union Pacific (UP) railyard, a couple of manufacturing industries, and several mechanic shops in Bloomington. Under SMMI, UP railyard was chosen for more concentrated air quality monitoring, but not the manufacturing units or mechanic shops. ⁶⁴⁰		CARB policies and programs; and State laws, such as SB 535, and AB 617.	Clean Air Act.

⁶³⁹ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

⁶⁴⁰ Castillejos, interview by Shishir Mathur and Christopher Ferrell, August 21, 2025.

6.6 Transportation Dimension (sub-dimensions TR1, TR2, TR3, TR4, and TR5)

6.6.1 Summary of disadvantages

Mathur and Ferrell (2024) identified a low level of disadvantage at the household mobility level (TR1). Indeed, the average Bloomington household has three cars. 79.6% of commuters in Bloomington drive alone, 9.78% carpool, and 7.48% work from home.⁶⁴¹ However, Bloomington was highly disadvantaged in all the other four subdimensions.

Bloomington's urban form is low-density and highly auto-dependent, with poor transit service, reducing overall local non-auto (ped/bike) accessibility (sub-dimension 2), transit accessibility (sub-dimension 3), and overall local/neighborhood accessibility (sub-dimension 4). Indeed, a study of 200 U.S. Metropolitan Areas found that the Riverside, San Bernardino, and Ontario metropolitan area has one of the highest percentages of transit deserts at 15.6%.⁶⁴²

Regional transit accessibility is low (consistent with sub-dimension 5). The average commute time is 32.3 minutes compared to the national average of 26.6 minutes. 4.55% of Bloomington workers have super commutes, which are commutes longer than 90 minutes.⁶⁴³

The Cedar-Avenue-road-widening project highlights the auto-dependency in this community. Cedar Avenue connects I-10 to Valley Boulevard and is the only road connecting the north and south of Bloomington. In 2017, the San Bernardino Association of Governments (SANBAG) and Caltrans planned to expand Cedar Avenue from four to six lanes to improve the auto levels of service.⁶⁴⁴ Cedar Avenue has since been widened and will widen again to ten lanes, which is to be completed in 2027.⁶⁴⁵ While these changes are likely to increase auto-based accessibility at the local and regional levels, they are likely to do so at the expense of pedestrians, cyclists, and the quality of transit service in the area.

⁶⁴¹ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

⁶⁴² Junfeng Jiao, Josh Conrad, and Amin Azimian, "Measuring Social Vulnerability in Transit Deserts of United States Metro Areas," *International Journal of Geospatial and Environmental Research* 8, no. 1 (April 2021): Article 3, 2.

⁶⁴³ Data USA, "Bloomington, CA," [datausa.io](https://datausa.io/profile/geo/bloomington-ca), accessed July 2, 2025, <https://datausa.io/profile/geo/bloomington-ca>.

⁶⁴⁴ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, March 2017, 3–21, <https://lus.sbcounty.gov/wp-content/uploads/sites/48/SpecificPlans/ValleyCorridorSPMarch2017web.pdf>.

⁶⁴⁵ San Bernardino County Transportation Authority, "I-10 - Cedar Avenue," SBCTA Projects, accessed July 2, 2025, <https://www.gosbcta.com/project/i-10-cedar-avenue/>.

6.6.2 Local tools to mitigate transportation-related disadvantages

Local tools to mitigate lack of ped/bike accessibility (sub-dimension TR2)

In 2017, San Bernardino County identified Bloomington's Valley Boulevard, a major transportation corridor, as a commercial corridor for reinvestment, and introduced the VCSP.⁶⁴⁶ When developing the VCSP, public comments were solicited. Residents wanted Valley Boulevard to be safer for pedestrians and cyclists, desired a town center, and felt that the community lacked an inviting destination for residents.⁶⁴⁷

A priority for the VCSP and the County is to reduce car dependency. The plan has eleven guiding principles, a few of which are specific to pedestrian safety and walkable destinations, as well as general safer mobility for all forms of transportation along the 1.25-mile-long corridor.⁶⁴⁸

The plan outlines sidewalk improvements, adding bicycle lanes, and increasing the number of bus shelters to improve safety and the desirability of using non-auto modes of transportation. The plan highlights California's shift towards complete streets.⁶⁴⁹ After a long period of inactivity, in the summer of 2025, the County conducted a high-level cost estimate for providing water, sewer, sidewalks, and utilities along this corridor, in order to determine how and when to provide the infrastructure. The aim is to undertake a complete street-like project.⁶⁵⁰ However, Bloomington is a very old community and, in many cases, adding sidewalks is not possible because the road right-of-way (ROW) may not conform to modern road standards unless aggressive and potentially unpopular approaches, such as acquiring front yards of residences, are used. Private development is the predominant way to install sidewalks because the development code requires them.

The County has also begun discussing a Class-3 bike lane. Lane continuity is an issue due to a non-uniform ROW. Finally, heavy truck traffic is a challenge, for example, along Cedar Avenue, where cyclists shouldn't come in proximity to trucks.⁶⁵¹

A traffic study of the corridor determined that the existing four lanes were sufficient for travel and did not require additional lanes. The VCSP proposed that the corridor could accommodate class two bike lanes by reducing the width of the current lanes.⁶⁵² Because bicyclists often use

⁶⁴⁶ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 3-17.

⁶⁴⁷ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 3-17.

⁶⁴⁸ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 3-17.

⁶⁴⁹ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 3-17.

⁶⁵⁰ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁶⁵¹ Johnson, interview by Shishir Mathur, August 21, 2025.

⁶⁵² San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 3-17.

the sidewalk to ride, the bike lanes would free up the sidewalk for safer pedestrian use. The addition of the bike lanes would also increase the service area of public transit.⁶⁵³

The plan recommends that all new projects include bicycle racks or lockers to encourage this alternative mode of transportation along the corridor.⁶⁵⁴ However, no such project has been implemented yet.⁶⁵⁵

Furthermore, the VCSP also includes plans for landscaping and lighting to provide walkable, tree-lined streets. Lighting would benefit both pedestrians and cyclists and increase safety along the corridor.⁶⁵⁶ After a long hiatus, the high-level cost estimates were developed in the summer of 2025, including costs for the bike lanes, landscaping, and lighting.⁶⁵⁷ It is noteworthy that the bike lanes are not being actively considered in the sense that the County is not actively pursuing grant opportunities. Furthermore, Valley Boulevard also goes through Fontana, where it is a designated truck route. So, both jurisdictions would want to have bike lanes along this road.

Moreover, the revenue source of the County's Public Works Department—the road maintenance fee—is intended solely for road pavement maintenance. There too the revenues exceed the cost. So, the County would need additional funds to implement these projects. Also, no mechanism exists to maintain street lights, except when a special district exists to provide them.⁶⁵⁸

VCSP also proposes a complete bikeway system that will connect several streets to Valley Boulevard by adding bike lanes. The County will pursue partnerships with the Inland Empire Biking Alliance and Colton Unified School District.⁶⁵⁹ The County is programming such improvements (bike lanes, sidewalks, and street lights) in their CIP and funding all of them through CDBG funds—about \$2–3 million/year.⁶⁶⁰ However, the partnerships have not materialized.⁶⁶¹

Finally, the VCSP proposes a potential bike-share program that would be free or low-cost to encourage bike riding as an alternative. It also suggests a bicycle or transit subsidy for employees to encourage alternative means of transportation.⁶⁶² However, given the County's current focus

⁶⁵³ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 3-17.

⁶⁵⁴ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 3-17.

⁶⁵⁵ Johnson, interview by Shishir Mathur, August 21, 2025.

⁶⁵⁶ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-10.

⁶⁵⁷ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁶⁵⁸ Johnson, interview by Shishir Mathur, August 21, 2025.

⁶⁵⁹ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-8.

⁶⁶⁰ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁶⁶¹ Johnson, interview by Shishir Mathur, August 21, 2025.

⁶⁶² San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-14.

on basic infrastructure provision and attracting private investment, such programs may come later.⁶⁶³

Local tools to mitigate lack of transit accessibility (sub-dimension TR3)

San Bernardino County has minimal transit service. Omnitrans is a public transit agency in the County that serves Bloomington. There are two bus routes, 19 and 29, that run along Valley Boulevard. Bus stops along the corridor lack shelters; the VCSP includes a request for bus shelters from Omnitrans along these routes.⁶⁶⁴ However, even after eight years, this is still an ongoing conversation about which agency is responsible for such shelters—Omnitrans or San Bernardino County Transportation Authority (SBCTA).⁶⁶⁵ Furthermore, a County staff member noted that Omnitrans prepares its capital plan every two years, during which it asks relevant governments for their preferred projects. These projects are identified through a flexible, collaborative process in which elected officials and/or community members voice their preferences. Bus shelters along Valley Boulevard have not been expressed as a priority during this process.⁶⁶⁶

Patchy transit service in Bloomington has led Omnitrans to consider micro-transit options.⁶⁶⁷ OmniRide Bloomington is a microtransit service that was introduced in 2022.⁶⁶⁸ This service was funded by Omnitrans through the Clean Mobility Options Mobility Project Voucher. The voucher awarded \$1 million dollars to provide three hybrid vehicles for on-demand transportation through a mobile app or by phone.⁶⁶⁹ OmniRide serves users in Chino, Chino Hills, Upland, and Bloomington. Its services are available in Bloomington seven days a week from 5 am to 10 pm. All vehicles are ADA accessible. The cost is \$4 per ride. Veteran, disabled, senior, and Medicare riders pay \$1 per ride.⁶⁷⁰ K–12 students can ride OmniRide for \$2 through the Free Fares for School program.⁶⁷¹

⁶⁶³ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁶⁶⁴ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 3-24.

⁶⁶⁵ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁶⁶⁶ Johnson, interview by Shishir Mathur, August 21, 2025.

⁶⁶⁷ San Bernardino County Transportation Authority, Existing Transit Conditions of San Bernardino County Transit System, (August 9, 2023), accessed July 8, 2025, 11, https://www.gosbcta.com/wp-content/uploads/2023/04/LRMTP_Existing-Transit-Conditions.pdf.

⁶⁶⁸ Omnitrans, “Get to Know OmniRide Bloomington: New On-Demand Transit Service,” Omnitrans OmniNews, accessed July 2, 2025, <https://www.omnitrans.org/get-to-know-omniride-bloomington-new-on-demand-transit-service/>.

⁶⁶⁹ California Air Resources Board, “LCTI: OmniRide Bloomington”, California Climate Investments – Clean Mobility Options Voucher Pilot Program, accessed July 2, 2025, <https://ww2.arb.ca.gov/lcti-omniride-bloomington>.

⁶⁷⁰ Omnitrans, “OmniRide: Your On-Demand Ride in Bloomington, Chino/Chino Hills & Upland”, Omnitrans Promotions, accessed July 2, 2025, <https://omnitrans.org/promotions/omniride/>.

⁶⁷¹ Omnitrans, “Free Fares for School: K-12 Students Ride Free,” Buy a Pass, accessed July 2, 2025, <https://www.omnitrans.org/buy-a-pass/free-fares-for-school/>.

Tools to mitigate lack of ped/bike accessibility, and local and regional transit accessibility (sub-dimensions TR2, TR3, and TR5)

The Circulation and Infrastructure Element of the VCSP have the following goals through the County: CI 2: The county's transportation system will, from the county down to the neighborhood level, provide mobility options for residents to access work and recreation; CI 3: Reduce car dependency and promote alternative transportation models; CI6: Expand trails for pedestrians, bicycles, and equestrian use to support non-motorized transportation; and CI 7: Seek regional transportation options such as roads, railroads, and airports to promote multi-modal transportation in the region.⁶⁷²

As part of the implementation of the VCSP, the County will consider conducting impact fee nexus studies for road, sewer, and park impact fees.⁶⁷³ No local impact fee has been adopted as part of this recommendation though a regional impact fee is in place (adopted in 2006) and all major roads in Bloomington are deemed to be of regional significance.⁶⁷⁴

The funding for the various VCSP programs is expected to be from regional, state, and federal programs.⁶⁷⁵ The San Bernardino Valley Subarea includes 15 cities and unincorporated communities in San Bernardino County. Measure I Local Street Projects collect twenty percent of the revenue from the subarea to be allocated for local street projects such as road improvements and transit.⁶⁷⁶ In Bloomington, I-10 on-ramps were improved using Measure I funds.⁶⁷⁷ Furthermore, the county's roads are maintained by the road maintenance fee, which, in turn, has three sources—federal gas taxes, SB1 funds, and Measure I funds.⁶⁷⁸

The Caltrans/SCAG Active Transportation Program funds pedestrian and bicycle improvements. This program combines other grants such as the Bicycle Transportation Account, Safe Routes to School (SRS) Programs, and some of the Highway Safety Improvement Program funds.⁶⁷⁹

In Bloomington, SRS Program funds were used to develop paths for children living in the Bloomington Grove housing project so they do not have to use city streets to reach schools.⁶⁸⁰ Furthermore, the county just completed another SRS study involving five more Bloomington

⁶⁷² San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-5.

⁶⁷³ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-5.

⁶⁷⁴ Johnson, interview by Shishir Mathur, August 21, 2025.

⁶⁷⁵ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-19.

⁶⁷⁶ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-20.

⁶⁷⁷ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

⁶⁷⁸ Johnson, interview by Shishir Mathur, August 21, 2025.

⁶⁷⁹ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-20.

⁶⁸⁰ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025.

schools. This study is funded through the Active Transportation Program, and the County intends to apply for the same grant for its implementation.⁶⁸¹

Furthermore in 2016, the County received over \$700,000 in grant funds from the California HCD Housing-Related Parks Program to create and improve parks. This program is awarded to local governments that support low-income housing development.

At the county level, the San Bernardino County Transportation Authority (SBCTA) started the Vehicle Miles Traveled Mitigation Bank, a pilot program funded by the SCAG Regional Early Action Planning (REAP) grant 2.0. People who use alternative modes of commuting, besides single-occupancy vehicles, can track their commutes in a smartphone app. The tracking earns credits that can be sold to developers or other transportation projects to offset their VMT mitigation requirements. These credits can then be applied to other VMT-reducing programs or projects, such as the San Bernardino Regional Housing Trust.⁶⁸²

Regional tools

At the regional level, in 2019, SCAG reported that car ownership had increased due to the greater accessibility and affordability of cars, gas prices, and an oversupply of parking. The cost of housing was also a contributing factor; as people move further away from their jobs, car dependency increases.⁶⁸³ SCAG suggests private carshare options could provide a solution to reducing car ownership.⁶⁸⁴ For example, Los Angeles has a program called Blue LA that provides electric vehicle carshare options in low-income areas in the city.⁶⁸⁵ SCAG is also interested in exploring Mobility-as-a-Service (MaaS) or Mobility on Demand (MOD). On one platform, a user would be able to plan, obtain trip data, make decisions, and pay for multiple modes of transportation for a trip.⁶⁸⁶ However, the County staff suggests that need may not be there for such programs in

⁶⁸¹ Johnson, interview by Shishir Mathur, August 21, 2025.

⁶⁸² San Bernardino County Transportation Authority, "SBCTA Developing Pilot VMT Mitigation Bank to Support Sustainable Development," SBCTA News, accessed July 2, 2025, <https://www.gosbcta.com/sbcta-developing-pilot-vmt-mitigation-bank-to-support-sustainable-development>.

⁶⁸³ Southern California Association of Governments, Transportation Demand Management (TDM) Strategic Plan and Final Report, May 2024, accessed July 8, 2025, Appendix D, 28, https://scag.ca.gov/sites/default/files/2024-05/tdm-strategic-plan_scag.pdf.

⁶⁸⁴ Southern California Association of Governments, Transportation Demand Management (TDM) Strategic Plan and Final Report, Appendix G, 14.

⁶⁸⁵ Southern California Association of Governments, Transportation Demand Management (TDM) Strategic Plan and Final Report, Appendix G, 14.

⁶⁸⁶ Southern California Association of Governments, Transportation Demand Management (TDM) Strategic Plan and Final Report, Appendix C, 19–20.

Bloomington presently given the focus on stakeholders' current priorities such as addressing illegal uses like truck parking and setting up the area for development.⁶⁸⁷

Reacting to the state-level funding programs such as the California HCD Infill Infrastructure Grant (IIG) Program and the California HCD TOD Housing Program (see Chapter 3.4.2 for a description of these programs), the County staff noted that they were not aware of the use of IIG or HCD TOD funds for Bloomington.⁶⁸⁸

The California Department of Parks and Recreation's Land and Water Conservation Fund (LWCF) Competitive Program awards grants to develop parks. Awards are up to \$2 million with some stipulations.⁶⁸⁹

The Congestion Mitigation and Air Quality Funds program is for transportation projects that maintain national air quality standards. This program could potentially support the VCSP's goal to build bicycle lanes.⁶⁹⁰ The County has applied and secured these funds for sidewalks, but not in Bloomington.⁶⁹¹

Private national foundations, including the Knight and Annenberg Foundations, are potentially sources of funding for the various projects outlined in the VCSP.⁶⁹² The County staff are not aware of the use of these foundations' funds for Bloomington.⁶⁹³

Other funding source options that the County considered for the VCSP were structured loan funds and low-interest revolving loan funds.⁶⁹⁴

Tables 6.7, 6.8, and 6.9 note the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various transportation disadvantages.

⁶⁸⁷ Harmon, Armstrong, and Bahl, interview by Shishir Mathur and Christopher Ferrell, August 18, 2025; Johnson, interview by Shishir Mathur, August 21, 2025.

⁶⁸⁸ Johnson, interview by Shishir Mathur, August 21, 2025.

⁶⁸⁹ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-21.

⁶⁹⁰ San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-21.

⁶⁹¹ Johnson, interview by Shishir Mathur, August 21, 2025.

⁶⁹² San Bernardino County Land Use Services Department, Valley Corridor Specific Plan, 5-21.

⁶⁹³ Johnson, interview by Shishir Mathur, August 21, 2025.

⁶⁹⁴ Johnson, interview by Shishir Mathur, August 21, 2025.

**Table 6.7 Bloomington: Strategies to Enhance Local Transportation Accessibility
(Sub-Dimensions TR1 to TR3)**

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
	PDA	County/Regional	State	Federal
Investments in transit.	VCSP – request Omnitrans to provide bus shelters OmniRide – in Bloomington.	Measure I Local Street Projects – 20% goes to local street projects, transit, etc. Connect SoCal 2024 Mobility policies.	Free Fares for School; Safe Routes to School; and TDA.	
Investments in walk/bike infrastructure.	VCSP – ped and bike infrastructure.	Caltrans/SCAG Active Transportation Program – ped and bike improvements Connect SoCal 2024 Mobility policies.	Safe Routes to School; ATP Clean Mobility Options for Disadvantaged Communities; and California Complete Streets Act of 2008.	FTA TOD Program; and CMAQ.

**Table 6.8 Bloomington: Strategies to Promote Overall Local/Neighborhood Accessibility
(Sub-Dimension TR4)**

Literature	Used/noted in local, regional, state, and federal plans			
	PDA	County/Regional	State	Federal
Traffic calming and other TDM measures.	VCSP – better pedestrian safety discussed.	Connect SoCal 2024 Mobility policies.	Safe Routes to School.	Congestion Mitigation and Air Quality Funds; MAP-21; and Safe Streets for All (SS4A).
Tools to increase density and land use diversity, such as compact, mixed-use infill TODs.	VCSP Zoning amendment in Bloomington – higher density commercial center.	Connect SoCal 2024 Priority Development Areas policies.	California HCD TOD Housing Program – build homes near transit. California HCD Infill Infrastructure Grant Program AHSC; and SB79, AB1244, and SB358.	FTA TOD.

Table 6.9 Bloomington: Strategies to Promote Regional Accessibility (Sub-Dimension TR5)

Literature	Used/noted in local, regional, state, and federal plans			
	PDA	Regional	State	Federal
Regional land use planning.		CCA EJ advocacy against warehouses; and Indirect Sources Rule.	AB32 and SB375; and Density Bonus Law.	
Corridor planning.	VCSP; County submitted an intent to federal Smart Grant program to study Valley Boulevard and Cedar Avenue. ⁶⁹⁵		AB 2011.	
Job/housing balance & match.		Goal 5 in SB County Consolidated plan.	AHSC; High Road Training Partnership (jobs closer to home); RHNA numbers determined by CA Dept of Housing and Community Development; AB 2864; CA HCD Jobs-Housing Balance Incentive Grants; Inter-Regional Partnership program; and CA Govt Code: Section 65890.1. Section 65890.3, and Section 65890.5.	
Provision of affordable housing.	Affordable Bloomington Bloomington Grove.	SB County Consolidated Plan – housing, homelessness; and Connect SoCal 2024 housing policies.	AHSC; Community Housing Development Organizations; Permanent Local Housing Allocation Program Non-Entitlement Local Government grant to fund California to assist homeless individuals; REAP; CalHFA Programs; tax credit program; Affordable housing legislation (see table	LIHTC; CDGB; HOME; and Vouchers

⁶⁹⁵ Johnson, interview by Shishir Mathur, August 21, 2025.

Literature	Used/noted in local, regional, state, and federal plans			
			under economic dimension); SB 375; and Density Bonus Law.	
Diverse employment options within DACs.		CDBG; America's Job Center for California (AJCC); Goal 5 in SB County Consolidated plan; and Adult Education Program Consortia in SB County.	High Road Workforce System.	
Transit accessibility to diverse employment options outside DACs.	Omnitrans has a priority and implementation plan. County staff are not aware of anything in it for Bloomington. ⁶⁹⁶			

6.7 Case Study Analysis

6.7.1 Socio-economic dimension

Bloomington was traditionally a rural community with large lots. The County's push to meet its RHNA numbers and the desire of some community members have led it to plan for compact mixed-use development, including affordable housing, along its major transportation corridor, Valley Boulevard. The interviewees noted two such recent affordable housing projects—Bloomington Grove and Affordable Bloomington. These developments also provide some community-level benefits, such as a library and permanent supportive housing. However, future housing developments are constrained by infrastructure limitations, including a lack of sewer and an outdated electric grid, not to mention a section of the residents who would like to maintain the community's rural character, and point to sewer overflow problems and a lack of a piped sewer system as reasons for maintaining this character.

Moreover, while local tools such as VCSP and county-level workforce development programs are ambitious, their on-the-ground impact in Bloomington is limited. Indeed, VCSP was first adopted in 2017. It saw minimal implementation in the years that followed and is currently being updated.

⁶⁹⁶ Johnson, interview by Shishir Mathur, August 21, 2025.

Especially telling is the lack of progress in ensuring access to healthy foods, where, aside from a few efforts by CBOs to distribute healthy food, no coordinated strategy is in place.

Overall, the efforts to mitigate socio-economic disadvantage are modest at best.

6.7.2 Educational dimension

Bloomington has a moderate level of disadvantage on ED1 (overall low level of education) and a low level of disadvantage on ED2 (low-quality K–12 education).

While the CJUSD has several programs that focus on the needs of disadvantaged students, the primary tools to enhance the overall education quality of the Bloomington community or the quality of K–12 education are related to workforce development. While several of these tools are available at the county and state levels, their implementation in Bloomington seems limited. Many tools are available at the state and federal levels to mitigate Bloomington’s K–12 education quality-related disadvantages, but their effectiveness could not be assessed due to the inability to interview school district staff.

6.7.3 Environmental dimension

Bloomington faces severe air pollution, low ground pollution, and a high risk of lead exposure for children.

Warehouses and transportation-logistics-related businesses, with the attendant heavy diesel truck traffic, are the primary cause of air pollution in Bloomington. The development of warehouses in Bloomington is recent. They began developing around two decades ago and, despite their significant impacts on air pollution and strong advocacy by local EJ advocates against them, continue to expand. In fact, the county and city governments of the region see these uses as an essential economic development tool. The change in federal administration has negated the few hard-fought environmental wins secured by EJ advocates and has led to suspension or withdrawal of several CARB tools. The local EJ advocates believe that the regional-level policies have had no impact in Bloomington. At the state level, while Bloomington is both an SB 535 and AB 617 community, the effect of these designations has been minimal.

Regarding exposure to lead, while several state laws exist, their impact on Bloomington, which has many, appear limited. Exposure to lead is compounded by the demolition of many of these old homes to build warehouses, thereby exposing children to lead-laden debris. Finally, the local CBOs also express a need for financial support for lead abatement, not just information on the risks and ways to mitigate them. The latter seems to be the thrust of county-level tools.

In summary, the efficacy of the tools to mitigate environmental disadvantage is minimal.

6.7.4 Transportation dimension

Bloomington has a low level of disadvantage under TR1 (household-level mobility) and a high level of disadvantage across the other four sub-dimensions: TR2 (ped/bike accessibility), TR3 (local transit accessibility), TR4 (overall local/neighborhood accessibility), and TR5 (regional transit accessibility).

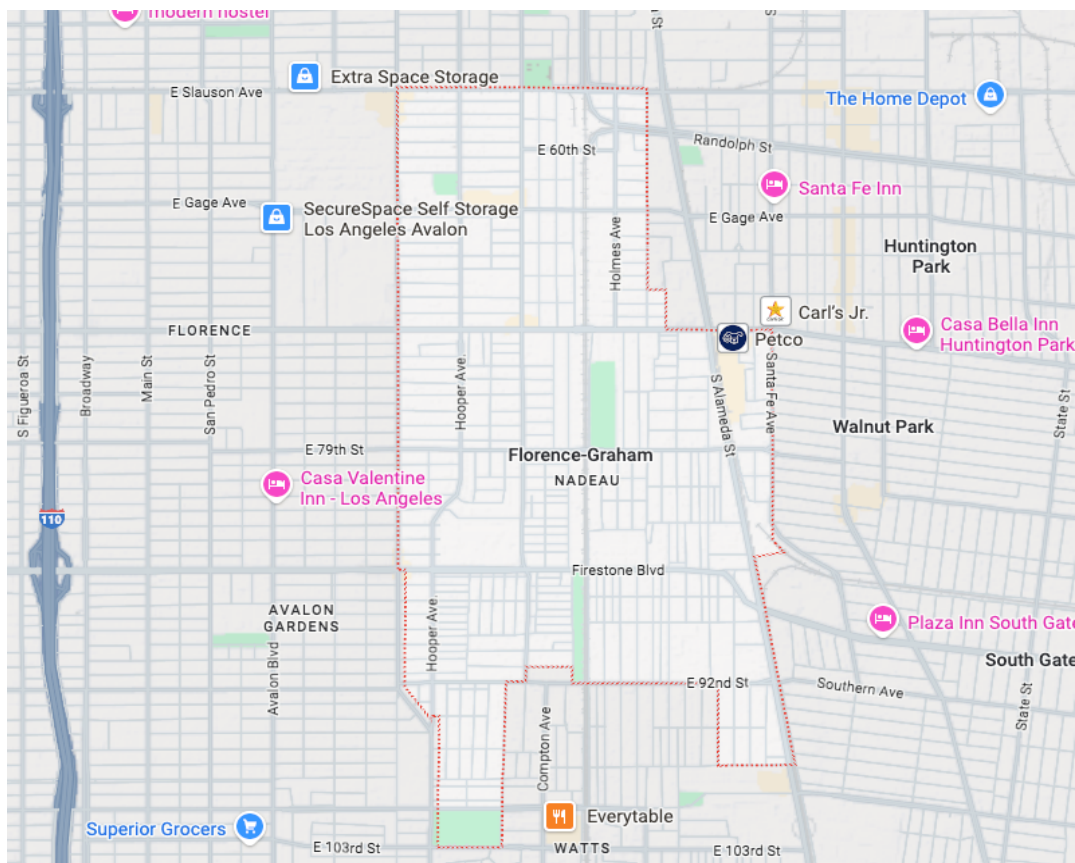
Bloomington's urban form is rural, low-density, and highly auto-dependent. Omnitrans is a public transit agency in the county that serves Bloomington. There are only two bus routes, both running along Valley Boulevard. Bus stops along the corridor lack shelters, and despite VCSP specifically calling for them, they have not yet been provided. VCSP also calls for a robust bike and pedestrian infrastructure. However, many constraining factors exist, including a lack of financial resources (not enough funds even to maintain roads, let alone make bike/ped improvements) and inconsistent road right-of-way, which make providing sidewalks and bike lanes difficult without undertaking unpopular land acquisition. VCSP has lofty goals, such as promoting bike-share programs, which are not even within the implementation horizon for a county government struggling to develop basic infrastructure in this community. In summary, the efficacy of the tools to mitigate environmental disadvantage is minimal.

7. Florence–Firestone Case Study

7.1 Overview

Florence-Firestone (F-F) is an approximately 3.5 square mile unincorporated community in Los Angeles County⁶⁹⁷ with a population of 65,020⁶⁹⁸ (Figure 7.1). F-F is to the south of the city of Los Angeles (Figure 7.2). Huntington Park, South Gate, and the unincorporated community of Walnut Park are neighbors to F-F.⁶⁹⁹

Figure 7.1 Map of Florence–Firestone, California, also known as Florence-Graham, California⁷⁰⁰



⁶⁹⁷ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices* (Los Angeles County Department of Regional Planning, December 2024), 4-12, https://planning.lacounty.gov/wp-content/uploads/2024/12/Metro_Area_Plan_and_Appendices.pdf.

⁶⁹⁸ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 2-21.

⁶⁹⁹ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 4-12.

⁷⁰⁰ Google Maps, *Florence–Firestone, also known as Florence-Graham, California* (screenshot by author, November 18, 2025), <https://www.google.com/maps>.

A map of Southern California highlighting the area affected by the Florence-Firestone fire. The fire's extent is marked by a red dashed line, covering a large portion of the San Gabriel Valley and surrounding areas. Key locations labeled include Lancaster, Palmdale, Los Angeles, Long Beach, Huntington Beach, Irvine, Newport Beach, Riverside, Fontana, Morena, Murrieta, Tustin, Santa Monica, Thousand Oaks, Oxnard, Ventura, and Edwards AFB. The Angeles National Forest is also indicated. Major highways shown include I-5, I-10, I-15, I-405, I-110, I-710, and SR-7101. A red star is placed near Los Angeles, and a red star is placed near Long Beach.

⁷⁰¹ Google Maps, Florence-Firestone's location within Los Angeles County, California (screenshot by author, November 18, 2025), <https://www.google.com/maps>.

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In addition to the Metro A Line, several buses run through the community, and it is located close to I-110, I-105, and I-10.⁷⁰³

Many F-F businesses were burned down and looted during the Los Angeles Uprising in 1992, but they did not receive financial support to rebuild their community.⁷⁰⁴

F-F residents are 93% Latino, 6.5% Black, and 0.5% white.⁷⁰⁵ LA County is approximately 74.5% minority population compared to approximately 99.5% in F-F. Median household income in F-F is \$44,600 and \$74,500 for the county. Median age is 28 in F-F and 36 for the County. In F-F, 35% of residents own and 65% rent, whereas in the county, 46% own and 54% rent. In F-F, 4.27% of residents 25 and older have a bachelor's degree compared to 21.69% of county residents.⁷⁰⁶ 87% of F-F residents speak Spanish at home. Over half of residents who are 25 or older have less than a high school education, which is three times higher than the county.⁷⁰⁷

There are five parks in F-F, with approximately an acre of park land for every 1,000 residents (compared to the recommended three acres⁷⁰⁸), totaling 60 acres. The community has a library with a volunteer organization called Friends of the Florence Library that promotes and supports library events and activities.⁷⁰⁹

Historically, industries provided economic growth and well-paying jobs for the community. However, starting in the 1960s, industries moved out of F-F to cheaper locations.⁷¹⁰ Currently, the majority (68%) of jobs in F-F are low-wage jobs in the retail and services sectors.⁷¹¹ Others

⁷⁰³ Los Angeles County Department of Regional Planning, "Florence-Firestone," Metro Area Plan: Communities, accessed July 31, 2025, <https://planning.lacounty.gov/long-range-planning/metro-area-plan/communities/florence-firestone/>.

⁷⁰⁴ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 2-20.

⁷⁰⁵ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan Project: Florence – Firestone Historic Context Statement and Survey Report*, September 2022, https://planning.lacounty.gov/wp-content/uploads/2023/04/ff_hcs_survey_dpr_forms_bind.pdf, 1.

⁷⁰⁶ Los Angeles County Department of Regional Planning, "Florence-Firestone."

⁷⁰⁷ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 2-22.

⁷⁰⁸ "California's Vision for Park Equity," *Parks for All Californians: Local Park Access Planning and Grants*, California Department of Parks and Recreation, Community Engagement Division – Office of Grants and Local Services, accessed November 23, 2025, https://www.parksforcalifornia.org/park_equity.

⁷⁰⁹ Los Angeles County Department of Regional Planning, "Florence-Firestone."

⁷¹⁰ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 2-20.

⁷¹¹ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 4-13.

are employed in manufacturing and administration. Over 2,500 community-based jobs have been added in F-F since 2002; however, industrial jobs have been decreasing.⁷¹²

Land use in F-F is primarily residential, making up approximately 60%. The second-largest land use is industrial, accounting for about 13%. Other land uses comprise small areas of commercial and mixed use. Homes are mostly single-family and multifamily.⁷¹³ There are 16,000 housing units, and the average household size is 4.6. About 77% of the housing in F-F was built before the 1970s. The community has been mostly built out with little room for more housing without redevelopment and densification. F-F's population growth has outpaced the county since 2000.⁷¹⁴

7.2 Summary of Disadvantages

Mathur and Ferrell (2024) found that F-F had high levels of disadvantage under Demographic, moderate levels under Economic, high levels under Educational, moderate levels under Environmental, and low to moderate levels under Transportation dimensions.⁷¹⁵

7.3 Socio-economic Dimension (sub-dimension DE1 and DE2 of the demographic dimension and sub-dimensions EC1 and EC2 of the economic dimension)

7.3.1 Demographics (sub-dimensions DE1 and DE2)

Mathur and Ferrell (2024) found that F-F demonstrates high levels of disadvantage under sub-dimensions concentration of racial minorities and single-parent households.⁷¹⁶ Indeed, F-F has a very high concentration of minorities (99.5%), with a 93% Latino, 6.5% Black, and 0.5% white population.⁷¹⁷ In comparison, LA County's population is approximately 74.5% minority.⁷¹⁸ 87% of F-F residents speak Spanish at home.⁷¹⁹

⁷¹² Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 4-12.

⁷¹³ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan Project*, 1.

⁷¹⁴ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 4-12.

⁷¹⁵ Mathur and Ferrell, *Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?*

⁷¹⁶ Mathur and Ferrell, *Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?*

⁷¹⁷ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan Project*, 1.

⁷¹⁸ Los Angeles County Department of Regional Planning, "Florence-Firestone."

⁷¹⁹ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 2-22.

In LA County, 22% of households are headed by a single parent. Of the unincorporated communities in the county, 16.7% of households are female-headed, 7.3% are female-headed with children, and 1.1% are female-headed with children under six.⁷²⁰

7.3.2 Economics (sub-dimensions EC1 and EC2)

Under the Economic dimension, Mathur and Ferrell (2024) found that F-F demonstrated low levels of distress under EC1: lack of affordable housing.⁷²¹ However, F-F demonstrated high levels of distress under EC2: concentration of poverty. Indeed, in 2020, the median household income in F-F was \$44,600, compared to \$74,500 in LA County,⁷²² and eight out of 13 census tracts in F-F are in areas of high segregation and poverty.⁷²³

After World War II, manufacturing jobs provided economic growth in the community, and much of the housing was built by 1940.⁷²⁴ Discriminatory redlining practices prevented people of color from obtaining mortgages in F-F. However, in 1948, when “whites-only” housing restrictions were removed, Black residents moved into the community, causing a wave of white residents to leave. In 1965, more white residents left F-F after the Watts Uprising.⁷²⁵ The Watts Uprising started when a California Highway Patrol officer detained a Black man who was driving while under the influence. The man’s detainment led to four days of civil unrest in the Watts community and other areas of LA, including F-F. 34 people died during the uprising, over a thousand people were injured, and 4,000 people were arrested. Property damage from the unrest was estimated to be \$20–\$40 million dollars.⁷²⁶

As the demographics in F-F shifted to mostly Black residents, the community experienced disinvestment that impacted property values and tax revenue.⁷²⁷

⁷²⁰ Los Angeles County Department of Regional Planning (LACDRP), *Housing Element Update 2022* (Los Angeles County Planning Department, May 17, 2022), 106, <https://planning.lacounty.gov/wp-content/uploads/2022/11/housing-element-20220517.pdf>.

⁷²¹ Mathur and Ferrell, Are California’s Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

⁷²² Los Angeles County Department of Regional Planning, “Florence-Firestone.”

⁷²³ Dana Cuff, Rayne Laborde, and Roya Chagnon, *Racial Equity in Planning for Unincorporated Los Angeles County, Building Justice* (Los Angeles: cityLAB-UCLA for Los Angeles County Department of Regional Planning, November 2020), 3, https://static1.squarespace.com/static/58e4e9705016e194dd5cdc43/t/602331e66af3126097ce1d85/1612919278608/F-F%20equity_Final-compressed.pdf.

⁷²⁴ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 2-18.

⁷²⁵ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 2-20.

⁷²⁶ County of Los Angeles Department of Regional Planning, *Los Angeles County Metro Area Plan Project*, 24.

⁷²⁷ County of Los Angeles Department of Regional Planning, *Los Angeles County Metro Area Plan Project*, 23.

F-F began experiencing deindustrialization in the 1960s. When the Firestone Tire Manufacturing plant closed in 1983, the community lost well-paying jobs, and many Black residents left the community. The demographics of residents shifted to a majority Latino, many of whom worked low-wage jobs in the community.⁷²⁸

Although Mathur and Ferrell (2024) did not find distress on EC1, using a lower threshold (median rent more than 30% of gross income), 91% of F-F renters are spending over 30% of their income on rent.⁷²⁹ Furthermore, 32% of households experience overcrowding (more than one person per room).⁷³⁰

The LA County Development Authority (LACDA) uses the Tracking Regional Affordability and Challenges to Tenancy (TRACT) tool to assess gentrification and displacement in neighborhoods. High gentrification intensity is defined as tracts with six or more of the ten Gentrification Intensity Indicators. Displacement vulnerability examines parcel-level property data and ownership, as well as census-tract-level data on demographics and economics. High displacement vulnerability is defined as tracts in the top 40% of the county for displacement vulnerability.⁷³¹ F-F is located in the South Los Angeles area. 58% of census tracts in downtown LA, South LA, the southern part of the San Fernando Valley, and the southwest region of the San Gabriel Valley have a high Displacement Vulnerability score under this metric. 55% of census tracts scored have high Gentrification Potential.⁷³²

7.3.3 Local tools to mitigate socio-economic disadvantage

The F-F TOD Specific Plan (FFTODSP) is the most prominent planning tool at the local level because it is the basis for many local projects. Developed to improve transit access, reduce VMT, and support the development of affordable housing in the community, it was adopted in February 2023 and became effective March 2023.⁷³³

A community organizer interviewed for this study noted that the County adopted a very top-down approach in preparing the plan, and the large majority of the work was done during COVID

⁷²⁸ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 2-20.

⁷²⁹ Mathur and Ferrell, *Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?*

⁷³⁰ Cuff, Laborde, and Chagnon, *Racial Equity in Planning for Unincorporated Los Angeles County*, 3.

⁷³¹ California Housing Partnership. *Los Angeles County Annual Affordable Housing Outcomes Report*. Los Angeles: California Housing Partnership, December 2024, 102–103, <https://chpc.net/wp-content/uploads/2024/12/Los-Angeles-County-Affordable-Housing-Outcomes-Report-2024.pdf>.

⁷³² California Housing Partnership. *Los Angeles County Annual Affordable Housing Outcomes Report*, 103.

⁷³³ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan* (Los Angeles County Department of Regional Planning, January 2022), accessed August 13, 2025, 2-1, https://planning.lacounty.gov/wp-content/uploads/2024/12/FF_TOD_Specific_Plan.pdf.

with minimal community engagement.⁷³⁴ The County staff argue that the plan was a result of a shift in the County's approach from being reactive to change to adopting a long-term planned approach. They note that the County secured a grant to develop a vision plan, which was completed in 2009.⁷³⁵ Before that, the County tried to create a community plan, but it never reached the Board of Supervisors for approval. Therefore, F-F relied on a county-wide land-use and zoning plan. The County General Plan was adopted in the 1980s and then updated in 2015. After the vision plan, a community plan was developed and adopted in the 2017–18 period. A Caltrans grant helped develop it. Caltrans gave the grant because F-F has three stations on the A/Blue light rail line that passes through the community. Developing a TOD Specific Plan was one of the implementation programs identified in this community plan. As a result, FFTODSP was developed. Next, the LA County Metro Area Plan (MAP) was adopted in 2024. It incorporated most of the community plan policies.⁷³⁶

Guiding Principle 2 of the FFTODSP calls for increasing housing around transit that provides options for residents of different income levels. The FFTODSP includes four new residential areas that offer a variety of housing options⁷³⁷ and proposes that policies for better housing affordability be identified.⁷³⁸

Indeed, large new housing developments have recently been built on Florence Avenue within three blocks of the Metro A line, near the Florence Station. There are three stations on this line. Florence Station is the safest. It is at-grade, making it easy to have eyes on the street. The other two stations are above grade and appear unsafe, according to our interview with the Florence-Firestone Community Organization (FFCO). Florence Station is the most in use. However, all the housing projects are controversial. They replaced existing amenities such as the County Library and an iconic neighborhood car wash. The community is frustrated that the housing is being developed at the expense of existing community amenities. Also, the housing projects are very tall (e.g., seven stories). Therefore, even though the housing is affordable and for seniors, and the community is sensitive to the need for more housing, it is fearful of gentrification and displacement threats and feels “targeted” for high-density housing.⁷³⁹

⁷³⁴ Jonathan Pacheco Bell (President and Public Information Officer, Florence–Firestone Community Organization) interview by Shishir Mathur, October 3, 2025.

⁷³⁵ Los Angeles County Department of Regional Planning, *Florence–Firestone Vision Plan 2009*, 1.

⁷³⁶ Patricia Hachiya (Supervising Planner, Department of Regional Planning, Los Angeles (LA) County), interview by Shishir Mathur and Christopher Ferrell, October 2 and 9, 2025.

⁷³⁷ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 2-3.

⁷³⁸ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 1-12.

⁷³⁹ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

The County staff provided the policy context for this housing concentration. They pointed out that in the current RHNA cycle, the County has been asked to plan for 90,000 units—three times as many as in the previous cycle. So, it was clear that major rezoning would be needed to plan for this number. However, there is also a realization that many communities are overburdened. So, the County needed to develop a methodology to identify sites suitable for rezoning while addressing equity and advancing fair housing and environmental justice (EJ). Therefore, a scoring system was created that scored the candidate sites on dimensions such as infrastructure, natural constraints, development potential, economic mobility, EJ, and transportation—awarding 10 points per dimension. This scoring system led to an over-concentration of rezoning sites in DACs located in the south-eastern section of the county. Hence, in the next iteration, the County increased the weights for economic mobility and EJ to 15 points each, which resulted in a more even distribution of rezoning-eligible sites. So, under this scoring system, several commercial corridors are eligible for rezoning, including in F-F, because proximity to transportation corridors is a significant factor. Furthermore, FFTODSP completed the rezoning suggested in the Housing Element and went above and beyond. For example, FFTODSP suggests a density as high as 150 du/acre compared to the 30 du/acre in the Housing Element.⁷⁴⁰

County staff point out that, currently, most housing applications for F-F are for ADUs, buoyed by permissive ADU laws that, for example, allow up to 3 ADUs in a duplex.⁷⁴¹ Furthermore, ADU permits need to be approved within a short (2-month) time frame. The County is facilitating ADUs by designating planners for ADU approvals and providing a catalog of pre-approved designs (starting in 2024).⁷⁴² There are some applications for deed-restricted new housing. They also note that, although F-F is a high-density area with three metro stations, many land parcels are very small. Hence, often land assembly is needed to enable large projects at the density required by the zoning code. Furthermore, several industrial uses are not converting to other uses because the industries want to remain in F-F.⁷⁴³

Guiding Principle 5 of the FFTODSP aims to support the growth of a variety of local jobs. The FFTODSP proposes an Industrial Mix zone and four mixed-use zones to allow for a variety of uses and services that support job creation. The nearby Alameda Corridor (a rail freight corridor) has been identified as an area for light or general industrial use.⁷⁴⁴ However, as per a community organizer, the community engagement was not effective, and the messaging was unclear.

⁷⁴⁰ Tina Fung (Supervisor, Housing Policy Section and James Drevno, Principal Planner, Housing Policy Section, Department of Regional Planning, Los Angeles (LA) County) interviewed by Shishir Mathur, October 29, 2025.

⁷⁴¹ Elsa Rodriguez (Acting Supervising Planner, Metro Development Services, LA County Planning Department) interview by Shishir Mathur, November 19, 2025.

⁷⁴² Fung, interview by Shishir Mathur, October 29, 2025.

⁷⁴³ Rodriguez, interview by Shishir Mathur, November 19, 2025.

⁷⁴⁴ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 2-3.

Moreover, the Alameda Corridor looks no different. It still has metal processing units and heavy industries. There are many jobs in these industries. The County wanted to rezone this corridor to live/work and crafts uses, which raised concerns about gentrification, especially because F-F has a history as a working-class community. So, now the County is more focused on clearing up blight. People from surrounding neighborhoods come to this area and litter. The County has also cleaned up numerous homeless RV encampments.⁷⁴⁵

Guiding Principle 7 of the FFTODSP emphasizes equitable and inclusive economic development considerations in the community's growth, to reduce displacement of existing residents and businesses.⁷⁴⁶ Towards that end, the County has an Affordable Housing Preservation Ordinance (AHPO), which requires any demolished housing units to be replaced with an equal number of new units at the same level of affordability. Furthermore, the developer must provide relocation assistance to residents while new units are being constructed. This ordinance disincentivizes demolishing existing units. According to a County representative, the County needs a similar ordinance to protect legacy businesses. None exists presently.⁷⁴⁷ The community organizer interviewed for this study corroborated that the focus is not to displace existing residents with new developments. That is why affordable, not market-rate, housing is being developed. He noted that, traditionally, County departments were not coordinated; hence, their plans were inconsistent. Lately, the departments are working together, and their plans are aligned.⁷⁴⁸

He further noted that regarding inclusive economic development, the community sees more activity and intent from the District 2 Supervisor, such as vacant lot activation and efforts to attract investment for the community. The County is trying to do better than in the past, when it was held accountable for replacing the local library with housing. There are a lot of vacant storefronts and a large amount of space is available, both signs that the County can do better.⁷⁴⁹

To further support community and economic development, the FFTODSP makes equity recommendations that include protections for existing tenants, homeowners, and workers, while continuing to pursue policies and resources that support existing residents and workers.⁷⁵⁰

Currently, County staff note that APHO and the County's Rent Stabilization and Mobile Home Rent Stabilization ordinances are the major tools to protect existing tenants.⁷⁵¹ The County adopted APHO around 2021, before the statewide no-net-loss law (SB 330) and its extension (AB

⁷⁴⁵ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁷⁴⁶ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 2-4.

⁷⁴⁷ Rodriguez, interview by Shishir Mathur, November 19, 2025.

⁷⁴⁸ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁷⁴⁹ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁷⁵⁰ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 1-12.

⁷⁵¹ Rodriguez, interview by Shishir Mathur, November 19, 2025.

1218) passed. While the state law allows demolished units to be replaced anywhere in the jurisdiction, the proposed update to the County ordinance will include a locational requirement—replacing demolished units within a half-mile. Also, DBCA is working on tenant protections, such as helping tenants relocate and providing them with the first right of refusal for the replacement units.⁷⁵²

The community organizer interviewed for this study highlighted the need for a more engaged County, while acknowledging that the County is now more intentional and equity-focused. He also notes that non-profit organizations, such as FFCO, are more active in workforce development than the County. For example, FFCO offers several training courses, such as substance and alcohol abuse training, to support mothers. He also pointed out that in lieu of the housing development that replaced the library, the County promised to provide a workforce development center, which it still has not provided.⁷⁵³

The FFTODSP also incorporates economic and community development as actionable items in the plan. One of the near-term action items—ED-6: Community-Serving Facilities in New Development—is to seek funding for the development of health clinics and job training centers. These facilities would be leased through the county.⁷⁵⁴

The community organizer interviewed for this study pointed to the housing development that replaced the library, where a workforce training center was promised but not built. Meanwhile, across the street from the library, where a community-beloved car wash once stood, a large housing development will be built. However, the developer learned from the experience of the development that replaced the library and, in direct partnership with the community, plans to provide a community space on the ground floor. An installation inside the community space to commemorate the car wash is being considered. Moreover, since this development will block the community's view of downtown Los Angeles, the developer will make the rooftop available as a community space. He also opined that if the parking lot site (another large parcel in F-F prime for redevelopment) gets developed, its developer should create an amenity elsewhere within F-F.⁷⁵⁵

Finally, the FFTODSP listed the following state and federal programs as potential funding sources to fund the plan: Affordable Housing and Sustainable Communities Grants, Active Transportation Program, Urban Greening Program, Road Repair and Accountability Act (SB 1) Funding, Highway Safety Improvement Program, Local Partnership Program, Transportation Alternatives Set-Aside Program, Certified Local Government Preservation Grants, Environmental Enhancement and

⁷⁵² Fung, interview by Shishir Mathur, October 29, 2025.

⁷⁵³ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁷⁵⁴ County of Los Angeles Department of Regional Planning, *Florence-Firestone Transit-Oriented District Specific Plan*, 7-12.

⁷⁵⁵ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

Mitigation Program, California Infrastructure and Economic Development Bank, CDBG Program, New Markets Tax Credit, Transformative Climate Communities, Infill Infrastructure Grant Program, Brownfield Grant Funding, and Cleanup Loans and Environmental Assistance to Neighborhoods program.⁷⁵⁶

The community organizer interviewed for this study noted that the County is pursuing several state and federal grants for F-F. For example, Proposition 68 funds were used to develop a linear park along a major arterial road. Recently, one of the state climate funds was used to build bus shelters. Moreover, the County applied for federal funds during the previous administration. Federal funds for capital infrastructure are on hold by the current administration. Overall, he noted that the County has a track record of securing grants.⁷⁵⁷

At the county level, LA County has several plans and programs that primarily focus on housing and local economic development. Among them are the Housing Element of the Los Angeles County General Plan, the MAP, and the Los Angeles Countywide Sustainability Plan. Additionally, the county offers resources to support community development.

Highlighting the challenges associated with promoting both housing and economic development, County staff note that the intermixing of industrial and residential/school parcels is a major concern due to environmental pollution risks. Several F-F industrial uses were there first, and the schools generally came next, often located close to these heavy industrial uses. The County developed the Green Zones (GZ) Program in response in 2022. During the MAP process, the County sought to rezone heavy industrial parcels to less intensive industrial uses, but encountered resistance from local businesses. So, one of the MAP's implementation programs is to conduct a countywide study of industrial areas to determine whether they can be deconcentrated. Unfortunately, there are currently no funds for this study. Furthermore, industries provide well-paying jobs for non-college graduates and generate revenue for a fiscally constrained county. The Countywide General Plan calls for changes to industrial uses to preserve industry in the County while spreading it throughout the County. As it is currently, industries are heavily concentrated in a few areas, such as F-F.⁷⁵⁸

Housing tools to mitigate socio-economic disadvantage

LA County General Plan's Housing Element (HE) has seven overarching strategies to ensure housing availability and affordability, stabilize housing supply, facilitate construction and maintenance of quality housing, affirmatively further fair housing (AFFH), ensure equity, ensure

⁷⁵⁶ County of Los Angeles Department of Regional Planning, *Florence-Firestone Transit-Oriented District Specific Plan*, 7-3.

⁷⁵⁷ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁷⁵⁸ Hachiya, interview by Shishir Mathur and Christopher Ferrell, October 2 and 9, 2025.

sustainability in housing production, and ensure compliance through program implementation and monitoring. Within these strategies are twelve goals and several corresponding policies.⁷⁵⁹ For example, under Strategy 5, policy 10.4 promotes housing that includes onsite child care, health clinics, and job training services.⁷⁶⁰ The County staff point to the slew of recent large housing developments approved in F-F and the surge in ADU permits. They also point out that since a county-wide inclusionary housing (IH) study found that IH was not financially feasible in many parts of the County, including F-F, the County is focusing more on providing incentives. For example, the County is updating the density bonus ordinance to provide larger density bonuses than required by the state law (95% to 120% bonus, compared to 50% under state law).⁷⁶¹ Furthermore, the ADU laws are very permissive. For example, they allow conversion of unpermitted structures into ADUs with the aim that the conversion process would enable these structures to be redeveloped up to the building code, and thus become safer.⁷⁶²

However, the community organizer interviewed for this study noted that, for state compliance reasons, the HE is written in a way that it receives the State's approval even though its implementation may be difficult. Furthermore, a county-wide HE covers a large area and number of communities, making it challenging to implement it at the community level.⁷⁶³ His sentiment was partially echoed by County staff when they opined that the strategies outlined in the HE can be rather lofty.⁷⁶⁴

Numerous short-term programs are noted in the LA County Housing Element. For example, Program 16: Tenant Opportunity to Purchase Act (TOPA) includes policies that offer initial purchasing options for tenants, tenant groups, community land trusts, and affordable housing developers of residential homes. TOPA helps prevent displacement through homeownership or affordable rent. The Board of Supervisors tasked the Department of Consumer and Business Affairs, the LA County Development Authority, the Department of Regional Planning, and the County Counsel to collaborate with community and mission-based groups, housing providers, and other stakeholders to develop recommendations for a TOPA policy for unincorporated communities in LA County. The recommendations were to include an ordinance, supporting policies, program design, community engagement plan, costs, and funding sources.⁷⁶⁵ The

⁷⁵⁹ Los Angeles County Department of Regional Planning (LACDRP), *Housing Element Update 2022* (Los Angeles County Planning Department, May 17, 2022), 7–13, <https://planning.lacounty.gov/wp-content/uploads/2022/11/housing-element-20220517.pdf>.

⁷⁶⁰ Los Angeles County Department of Regional Planning (LACDRP), *Housing Element Update 2022*, 11.

⁷⁶¹ Fung, interview by Shishir Mathur, October 29, 2025.

⁷⁶² Rodriguez, interview by Shishir Mathur, November 19, 2025.

⁷⁶³ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁷⁶⁴ Rodriguez, interview by Shishir Mathur, November 19, 2025.

⁷⁶⁵ Los Angeles County Department of Regional Planning (LACDRP), *Housing Element Update 2022*, 38.

community organizer interviewed for this study noted that TOPA is relevant to F-F but has not yet been implemented there.⁷⁶⁶

The MAP has two historic preservation goals: to preserve areas of historic significance and increase a sense of place in the unincorporated communities within the MAP. Goal HP 1 for the preservation of historic resources, policy HP 1.3 specifies F-F as a community to prioritize the nomination of residential and commercial properties because of the high risk of demolition. Goal HP 2, policy HP 2.2 specifies Florence Avenue in F-F (among other communities in the MAP) as a commercial location to prioritize sign and design standards to create a sense of place and history.⁷⁶⁷ While the County staff noted limited use of these policies, especially HP 2.2 in F-F because of a lack of development activity that requires new floor area or tenant protection, except when County provides funds for such activities. Regarding signage, they opined that there was no push for new signs and recollected that a few years ago, there was an instance where a sign of historical value needed to be preserved, which the County did.⁷⁶⁸

Nevertheless, the community organizer interviewed for this study noted that non-profit organizations banded together to advocate for historic preservation, which is much needed in F-F, especially amid development pressures from new housing projects. Historically significant sites existed in F-F but were not designated officially as valuable. New housing seemed to be built at the expense of established “places” such as the historic car wash and the library described above. Such “place erasure” has been a big issue for F-F and the CBOs serving it. Thus, FFCO and other allied community organizers asked the County to document historically significant sites, and worked to document all such sites in F-F. The Historic Context Statement cataloged the historic sites on F-F to help resist this place erasure. This document was then included in the MAP.⁷⁶⁹

The Department of Consumer and Business Affairs (DCBA) supports renters through the Stay Housed LA County program. The Department of Health Services (DHS) has programs such as the Housing for Health, the Flexible Housing Subsidy Pool (FHSP), and Rapid Rehousing (RRH) vouchers. The Department of Mental Health (DHM) has the Mental Health Service Act (MHSA) funds, Special Needs Housing Program (SNHP), the Mental Health Housing Program (MHHP) funds, the Alternative Housing Model, and the No Place Like Home (NPLH) program. Finally, the

⁷⁶⁶ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁷⁶⁷ County of Los Angeles, *Metro Area Plan and Appendices* (Los Angeles, CA: Los Angeles County Department of Regional Planning, December 2024), 3-6–3-7, https://planning.lacounty.gov/wp-content/uploads/2024/12/Metro_Area_Plan_and_Appendices.pdf.

⁷⁶⁸ Rodriguez, interview by Shishir Mathur, November 19, 2025.

⁷⁶⁹ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

Los Angeles Homeless Services Authority (LAHSA) provides RRH vouchers and the Permanent Support Housing (PSH) program.⁷⁷⁰

Jobs-related tools to mitigate socio-economic disadvantage

The MAP has numerous job-related goals for all the county's unincorporated communities. Goals 11 through 17 are specific to F-F. Goal 15 is to provide local communities with a range of work opportunities. Six policies are outlined in this goal. Policy 15.1 emphasizes commercial growth in commercial corridors by attracting business and marketing both existing and future commercial businesses. Among the relevant corridors highlighted are Slauson Ave., Florence Ave., Firestone Blvd., and Compton Ave. Policy 15.2 aims to attract employment, multifamily housing, and commercial retail in Transit Center-designated areas. Policy 15.3 seeks to provide amenities in industrial areas, such as pocket parks and smaller-scale services and retail for those working in industrial areas. Policy 15.4 aims to promote a community marketplace that attracts local and small businesses offering specialty foods and crafts, as well as a place for community gathering. Policy 15.5 seeks to establish a farmers' market in the community. Finally, Policy 15.6 aims to attract and incentivize businesses and services that provide everyday amenities and services to the community, such as restaurants, grocery stores, entertainment, and spaces for cultural events.⁷⁷¹ The community organizer interviewed for this study noted that Florence Avenue has received the most attention, where there are a lot of housing investment opportunities. Central Avenue is also attracting significant attention, including through the County's Corridors 2 Community program. The County Board of Supervisor Mitchell's office has paid considerable attention to vacant land along Central Avenue, seeking to turn it into a community resource such as a park, or a space for vendors. FFCO is a part of this corridor activation. Such efforts align with MAP's larger policy goal of focusing on corridors.⁷⁷²

The MAP also plans to establish the Commercial Corridors Legacy Business Retention Program (LBPR) to prevent the displacement of businesses over 50 years old located along the pilot program's selected corridors. This program will include parameters that support locally owned and operated businesses, such as limiting business size to 5,000 square feet. The program will also create a registry to help identify eligible businesses through community engagement. The program will create funding opportunities and grants for property owners, including providing 10-year leases to legacy businesses. Additionally, the funds will be used to stabilize rents for legacy businesses, replace outdated equipment, and develop marketing and branding materials. Furthermore, the program will establish a legacy business technical assistance program to

⁷⁷⁰ California Housing Partnership, *Los Angeles County Annual Affordable Housing Outcomes Report* (Los Angeles: California Housing Partnership, December 2024), 63, <https://chpc.net/wp-content/uploads/2024/12/Los-Angeles-County-Affordable-Housing-Outcomes-Report-2024.pdf>.

⁷⁷¹ County of Los Angeles, *Metro Area Plan and Appendices*, 4-19.

⁷⁷² Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

provide training for entrepreneurs and women-owned businesses, technical and design assistance from an architect, ADA compliance audits, and pro bono legal support. Grant funding will be secured to repair any frontage damage caused by vandalism. Additionally, the program will provide a legacy business toolkit to support employee ownership. Finally, permitting and regulatory processes will be streamlined for legacy businesses.⁷⁷³ The community organizer interviewed for this study noted that F-F has several legacy businesses that could benefit from this program.⁷⁷⁴

The Community Benefits Program (CBP) is another county-wide program described in the MAP. A Community Benefits Policy exists under the LA County Development Authority (LACDA); the MAP proposes to expand on it to include the projects and programs within the MAP area. The LACDA's Community Benefits Policy supports community engagement, the employment of locally owned, small, and disabled veteran businesses, affordable housing, workforce development, and economic analysis. The MAP has a tiered approach to CBP and integrates density bonuses to support communities. The MAP CBP works with the 2022 adopted Federal Opportunity Zone and the Economic Development Projects Policy that provides guidelines on inclusionary housing and community benefits for economic development projects in federally recognized opportunity zones. The CBP is organized into three tiers.

Tier 1: Amenities and services that support the community, such as public open spaces, libraries, public schools, childcare and senior centers, social service or non-profit clinics, cultural facilities, mobility hubs, and affordable housing locations.

Tier 2: Improvements to active transportation and transit projects such as bike lanes, school and park access, bus shelters, sidewalk widening, and providing development rights for historic properties.

Tier 3: Each community in the MAP would manage a Community Benefits Fund that would have an oversight committee comprising District offices, the planning department, LACDA, and others. Community members would be nominated to be on the committee. The following are those who may qualify for funding: affordable housing programs, including Community Land Trusts; street improvements; public open spaces; legacy and community serving businesses; arts and cultural organizations; sidewalk vending; assistance to food truck space construction; centers for counseling and therapy; and services for the homeless.⁷⁷⁵

⁷⁷³ County of Los Angeles, *Metro Area Plan and Appendices*, 5-4-5-5.

⁷⁷⁴ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁷⁷⁵ County of Los Angeles, *Metro Area Plan and Appendices*, 5-5-5-7.

The community organizer interviewed for this study noted that F-F would benefit from such a policy, but they have seen little in terms of implementation.⁷⁷⁶

Moreover, the MAP's Accessory Commercial Unit (ACU) Program provides technical assistance, financing, and incentive opportunities. The technical assistance includes a toolkit for obtaining ACU permits and licenses within the MAP area. Additionally, a team of staff from the County Departments is available to support those seeking ACUs.⁷⁷⁷ The County staff noted that there are several ACU candidate properties in FF. However, the current program cannot be used for properties that sell alcohol (e.g., minimarkets). So, these properties can't use the by-right ACU program and must go through the regular permitting process. The alcohol-related restriction in the ACU program is due to the District 1 Supervisor's opposition to the concentration of alcohol selling businesses.⁷⁷⁸

Regional tools

Apart from the tools noted in Chapter 3.1.3.2, at the regional level, Connect SoCal 2024 identifies seven housing-related policies, which are all relevant for F-F:

1. Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social, and similar) to further fair housing access and equity across the region.
2. Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities.
3. Support local, regional, state, and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region.
4. Prioritize communities that are vulnerable to displacement pressures by supporting community stabilization and increasing access to housing that meets the needs of the region.
5. Promote innovative strategies and partnerships to increase homeownership opportunities across the region with an emphasis on communities that have been historically impacted by redlining and other systemic barriers to homeownership for people of color and other marginalized groups.

⁷⁷⁶ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁷⁷⁷ County of Los Angeles, *Metro Area Plan and Appendices*, 5-7.

⁷⁷⁸ Rodriguez, interview by Shishir Mathur, November 19, 2025.

6. Advocate for and support programs that emphasize reducing housing cost burden (for renters and homeowners), with a focus on the communities with the greatest needs and vulnerabilities.
7. Support efforts to increase housing and services for people experiencing homelessness across the region.⁷⁷⁹

Additionally, the plan offers three policies under Priority Development Areas, of which the following two are relevant for F-F:

1. Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities.
2. Promote the growth of origins and destinations, in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicle (SOV) dependency and VMT.⁷⁸⁰

Table 7.1 notes the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various socio-economic disadvantages.

⁷⁷⁹ Southern California Association of Governments, *Connect SoCal 2024 – Chapter 3*.

⁷⁸⁰ Southern California Association of Governments, *Connect SoCal 2024 – Chapter 3*, 116.

Table 7.1 F-F: Strategies to Mitigate Socio-economic Disadvantage

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
	PDA	County/Regional	State	Federal
Provide affordable housing in high-resource areas.	Not relevant because F-F is not a high-resource area.			
Provide mixed-income housing in low-income neighborhoods.	FFTODSP	LA County GP's Housing Element; MAP; and SoCal 2024's housing-related policies.	CA HCD Infill Infrastructure Grant Program; AHSC funds; and State Density Bonus Law.	LIHTC; CDGB; HOME; and Vouchers .
Place-based strategies; for example, investing CDBG and CRA funds in local neighborhoods, and other local economic development strategies, such as those to create jobs, provide job training, increase basic education, implement universal basic income, revitalize neighborhoods, and locate jobs in high-quality communities.	FFTODSP (housing, jobs, transit access, improve stations, etc.).	MAP – Goal HP1; LA County Housing Element Programs: FSS HUD; Policy 10.4, Housing for Health, FHSP, NPLH; and SoCal 2024's policies under "Economy."	CARB California Climate Investment funds; Workforce Innovation and Opportunity Act (WIOA); State of CA Workforce Development Board's Unified Strategic Workforce Development Plan; American's Job Center of California (AJCC); and High Road Training Partnerships.	CRA; CDBG; and SBA Loans.
Reduce disparities in accessing quality health care.			CARB California Climate Investments.	
Enhance access to healthy foods.	FFTODSP (farmers market, community market); and FFCO distributes food in F-F and the larger region once or twice a month. ⁷⁸¹		SNAP, CNIP, WIC, and Seniors Farmers Market Nutrition Program. Assembly Bill 581: The Healthy Food Financing Initiative (not sure whether it benefits F-F directly). ⁷⁸²	

⁷⁸¹ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁷⁸² Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

7.4 Educational Dimension (sub-dimensions ED1 and ED2)

7.4.1 Summary of disadvantages

This research found that F-F has high levels of disadvantage in both education sub-dimensions—ED1 (overall low level of education) and ED2 (low-quality K–12 education). Indeed, the overall level of education is low in F-F. Only 4.27% of F-F residents age 25 and older have a bachelor's degree compared to 21.69% of county residents.⁷⁸³ Over half of residents (53%) who are 25 or older have less than a high school education, which is about three times higher than county residents (20%). 87% of F-F residents speak Spanish at home.⁷⁸⁴ F-F presented as disadvantaged under education and linguistic isolation on CalEnviroScreen 4.0 too.⁷⁸⁵

F-F schools are in the Los Angeles Unified School District (LAUSD). In the 1960s, F-F schools were overcrowded and lacked funding for maintenance and newer facilities. In 1963, Five Black F-F students that were known as the South Gate Five experienced resistance and violence for attending a majority white school outside of F-F but within the LAUSD at South Gate High School.⁷⁸⁶ The South Gate Five were part of LAUSD's plan to move towards desegregation.⁷⁸⁷ The 1965 Watts Uprising brought attention to tensions around desegregation, with students, activists, and members of the community advocating for educational equality. Latino students were the most likely to attend poor-quality schools, with few opportunities to pursue a college education. In 1968, 15,000 East LA Latino high school students walked out of their classes to protest educational inequality. This walkout brought attention to the inequalities experienced by F-F students in the LAUSD. In the late 1970s, the Los Angeles Board of Education implemented a program to bus students to different schools in the district. Proposition 1: Desegregation Busing Court Orders Amendment passed in 1979, ending mandatory busing programs. LAUSD remains segregated by the demographics of its neighborhoods. On a larger note, a 2019 study reported that over half of students in the US are in either 75% or more white majority schools or 75% or more non-white schools.⁷⁸⁸

⁷⁸³ Los Angeles County Department of Regional Planning, "Florence-Firestone," Metro Area Plan: Communities.

⁷⁸⁴ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 2-22.

⁷⁸⁵ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 2025, 3.2-1–3.2-3.

⁷⁸⁶ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan Project: Florence – Firestone Historic Context Statement and Survey Report*, 100.

⁷⁸⁷ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan Project: Florence – Firestone Historic Context Statement and Survey Report*, 110.

⁷⁸⁸ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan Project: Florence – Firestone Historic Context Statement and Survey Report*, 110–11.

Furthermore, school quality in F-F ranks as below average based on the LA County Department of Regional Planning Equity Indicators Tool.⁷⁸⁹

7.4.2 Local tools to mitigate education-related disadvantage

Using the example of the City of Los Angeles’s Public Benefit Zone policy, it has recently been suggested that a similar policy be adopted in F-F through the FFTODSP to create Demonstration Depots, which would be exempt from permitting and allow for a variety of public uses such as internet hotspots, library resources, and after-school programs. The Demonstration Depots can be an expansion of the Constituent Service Centers to support those most in need in the community, such as those experiencing homelessness and school-aged children. During COVID-19, the County Library created “Sidewalk Services” that provided access to hot spots and books at specific library locations. It is suggested that the County should expand the Sidewalk Services to F-F at libraries, and schools.⁷⁹⁰

The community organizer interviewed for this study noted that the County is undertaking such programs. For example, it created digital hubs such as the technology center in Roosevelt Park, located in F-F, which has computers and makers’ space with 3D printing capability. There are after-school programs in libraries and parks, although funding cuts have impacted them. On a positive note, the community supports investments in libraries.⁷⁹¹

At the county level, the MAP’s economic development goal ED3 includes workforce education under Policy ED 3.1 to form partnerships between educational institutions and the business community to offer education and training to the workforce. The programs listed as examples include supervisory certification, teacher certification, healthcare training, and technology training.⁷⁹² Similarly, Policy ED 3.2 encourages businesses to offer low skill workers opportunities to advance professionally.⁷⁹³

MAP Goal 4 is to have more diverse and quality work opportunities for the local workforce. For example, Policy 4.3 seeks partnerships with the biomedical and research industries to provide educational and professional advancement opportunities for the local community.⁷⁹⁴

LAUSD also runs several districtwide financial and other assistance professional development programs for staff and students. These include:

⁷⁸⁹ Cuff, Laborde, and Chagnon, *Racial Equity in Planning for Unincorporated Los Angeles County*, 3.

⁷⁹⁰ Cuff, Laborde, and Chagnon, *Racial Equity in Planning for Unincorporated Los Angeles County*, 21.

⁷⁹¹ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁷⁹² County of Los Angeles, *Metro Area Plan and Appendices*, 3.4-6.

⁷⁹³ County of Los Angeles, *Metro Area Plan and Appendices*, 3.4-6.

⁷⁹⁴ County of Los Angeles, *Metro Area Plan and Appendices*, 3.4-7.

1. Supporting Teacher Education, Preparation and Undergraduate Program (STEP UP and Teach): Provides financial assistance to paraeducators and School Climate Advocates, who aspire to become teachers. Members may receive up to \$8,000 annually for education and credential-related expenses.⁷⁹⁵
2. Building Our Own Staff as Teachers (BOOST): Provides financial assistance (up to \$4,500) and guidance (mentoring) to LAUSD employees for out-of-pocket or direct pay expenses, including expenditures paid through a student loan.⁷⁹⁶
3. Study Materials and Resources for Tests (SMART): Offers courses and study materials for teachers taking the California Subjects Examinations for Teachers (CSET).⁷⁹⁷
4. Career Assistance for Registered Nurses in Education (CARE): CARE is LAUSD's newest Career Ladder program, providing "individualized support, mentoring, and financial assistance to classified employees seeking a career in school nursing."⁷⁹⁸
5. "Educators of Tomorrow (EOT): Collaboration to provide high school students with employment opportunities in LAUSD upon high school graduation."⁷⁹⁹

LAUSD also offers the International Newcomer Enrichment Summer Program for foreign-born high school students at 37 host high schools and virtual classes online. Students receive academic language development support and wraparound services.⁸⁰⁰

Tables 7.2 and 7.3 note the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various education-related disadvantages.

⁷⁹⁵ Los Angeles Unified School District, Human Resources Division, "STEP UP and Teach Policy Guide," revised August 2025, https://media.edlio.net/2e0a8bf0/1c0f7ed1/df3ecb75/3e0269b841194f01b26dde269a8be5da?_=STEP%20UP%20and%20Teach%20Policy%20Guide%20Fillable.pdf.

⁷⁹⁶ Los Angeles Unified School District, Human Resources Division, "BOOST Policy Guide," accessed December 17, 2025, https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/605/BOOST%20Policy%20Guide%208_25%20-%20Final.pdf.

⁷⁹⁷ Los Angeles Unified School District, Human Resources Division, "SMART," accessed December 17, 2025, <https://www.lausd.org/Page/17487>.

⁷⁹⁸ Los Angeles Unified School District, Human Resources Division, "CARE," accessed December 17, 2025, <https://www.lausd.org/Page/17486>.

⁷⁹⁹ Los Angeles Unified School District, Human Resources Division, "Educators of Tomorrow (EOT)," accessed December 17, 2025, <https://www.lausd.org/Page/17488>.

⁸⁰⁰ Los Angeles Unified School District, Human Resources Division, "International Newcomer," accessed December 17, 2025, <https://www.lausd.org/Page/19119>.

Table 7.2 F-F: Strategies to Improve Education at the Community Level

Literature	Used/noted in local, regional and state plans; and interviews		
	PDA	County/Regional	State
Labor-market relevant educational programs and partnerships with employers to develop educational programming. ⁸⁰¹		From MAP: ED 3.1, 3.2, Goal 4, Goal 15, LBRP, and CBP.	High Road Training Partnership AJCC CAEP; College and Career Access Pathways Grant.
Targeted outreach to early school leavers, adults, racial minorities, and other socio-economically disadvantaged populations. ⁸⁰²	Not LAUSD or the emerging charter schools, but several nonprofit community partners do targeted outreach to the K–12 community. ⁸⁰³	LAUSD: Newcomer Enrichment Summer Program.	High Road Training Partnership; and California State Library’s LTSA Community Impact Grants – fund local projects and community needs.
Financial assistance, and online/hybrid classes. ⁸⁰⁴		SoCal 2024 broad-band-related policies; and LAUSD: STEP UP and TEACH, BOOST, SMART, CARE, EOT, and Newcomer Enrichment Summer Program.	
Local/community learning centers. ⁸⁰⁵	Digital hubs, makers’ space, and after-school programs in libraries and parks. ⁸⁰⁶	LA County Library sidewalk services; and SoCal 2024 broad-band-related policies.	America’s Job Center for California (AJCC); High Road Training Partnerships; CAEP; and CCAP.
Guidance and counseling services. ⁸⁰⁷		LAUSD: STEP UP and TEACH, BOOST, SMART, CARE, and EOT.	

⁸⁰¹ Broek and Hake, “Increasing Participation of Adults in Higher Education.”

⁸⁰² Broek and Hake, “Increasing Participation of Adults in Higher Education.”

⁸⁰³ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁰⁴ Broek and Hake, “Increasing Participation of Adults in Higher Education.”

⁸⁰⁵ Broek and Hake, “Increasing Participation of Adults in Higher Education.”

⁸⁰⁶ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁰⁷ Broek and Hake, “Increasing Participation of Adults in Higher Education.”

Table 7.3 F-F: Strategies to Improve the Quality of K–12 Education

	Used/noted in local, regional, state, and federal plans				
	PDA	City/County	Regional	State	Federal
Improving teachers' quality: higher teacher salary, professional development opportunities, and performance-based pay. ⁸⁰⁸		LAUSD: STEP UP and TEACH, BOOST, SMART, CARE, and EOT.			Title II, Part A.
Core: instructional strategies: evidence-based literacy instruction, ⁸⁰⁹ personalized/individualized learning models, ⁸¹⁰ inquiry-based and active learning, ⁸¹¹ and targeted interventions and data-driven adjustments. ⁸¹²				California School Dashboard; and Universal Transitional Kindergarten (UTK).	Title III, Part A.
Systemic and equity-focused reforms: school finance reform, ⁸¹³ standards-based reform (SBR), ⁸¹⁴ strengthening college and career pathways, ⁸¹⁵ and equitable use of technology. ⁸¹⁶				Local Control and Accountability Plan (LCAP); Community Schools Partnership Program; California Universal Meals (UMP); Summer Matters Campaign. After School Education and Safety	Title I, Part A; Title IV, Part A: Student Support and Academic Enrichment (SSAE) Grants; Individuals with Disabilities Education Act

⁸⁰⁸ Thomas C. Dawson and K. Lloyd Billingsley, *Unsatisfactory Performance: How California's K–12 Education System Protects Mediocrity and How Teacher Quality Can Be Improved* (September 2000), <https://eric.ed.gov/?id=ED453152>.

⁸⁰⁹ Education Northwest, "Literacy Lens: Effective Literacy Practices for Secondary Students," accessed December 7, 2025, <https://educationnorthwest.org/insights/literacy-lens-effective-literacy-practices-secondary-students>.

⁸¹⁰ Education Northwest, "Literacy Lens: Effective Literacy Practices for Secondary Students."

⁸¹¹ Moreno, "K–12 Science Education Reform."

⁸¹² Hanover Research, "8 Ways to Close the Achievement Gap in Schools."

⁸¹³ Kirst, "Standards-Based Education Reforms."

⁸¹⁴ Learning Policy Institute, *Standards-Based Education Reforms: Looking Back to Look Forward* (2024), <https://learningpolicyinstitute.org/product/standards-based-education-reforms-report>.

⁸¹⁵ James, "K–12 Education."

⁸¹⁶ James, "K–12 Education."

	Used/noted in local, regional, state, and federal plans				
				(ASES); Charter School Facility Grant Program; (SB740); Public Charter Schools Grant Program (PCSGP); College and Career Access Pathways Grant; and California Adult Education Program (CAEP).	(IDEA); and Perkins Career and Technical Education Act.
Supporting the whole child and Community: whole-child approaches and wraparound services, ⁸¹⁷ fostering school connectedness and positive climate, ⁸¹⁸ and partnerships and community engagement. ⁸¹⁹		LA County Wrap-Around; and LAUSD: Newcomer Enrichment Summer Program.		California Universal Meals (UMP); California State Preschool Program (CSPP); and After School Education and Safety (ASES).	Title IV, Part A: Student Support and Academic Enrichment (SSAE) Grants; Individuals with Disabilities Education Act (IDEA); Head Start; Child and Adult Care Food Program (CACFP); National School Lunch Program (NLSP); and School Breakfast Program (SBP).

⁸¹⁷ James, “K–12 Education.”

⁸¹⁸ Robert Balfanz, Angela Jerabek, Krystal Payne, and Jenny Scala, “Strengthening School Connectedness to Increase Student Success,” *EdResearch for Action*, Overview Brief no. 29 (May 2024), <https://edresearchforaction.org/research-briefs/strengthening-school-connectedness-to-increase-student-success/>.

⁸¹⁹ Hanover Research, “8 Ways to Close the Achievement Gap in Schools.”

7.5 Environmental Dimension (sub-dimensions EN1, EN2, and EN3)

7.5.1 Summary of disadvantages

Mathur and Ferrell (2024) found that F-F has low levels of disadvantage under EN1 (air pollution), no disadvantage under EN2 (ground pollution minus lead), and high levels of disadvantage under EN3 (children’s lead risk exposure from housing).⁸²⁰

However, a review of documents shows that industries in F-F have contributed to significant water, air, and soil pollution. Moreover, F-F, as a part of Southeast Los Angeles (SELA), is an AB 617 community due to high air pollution levels. Apart from F-F, five other communities—South Gate, Walnut Park, Huntington Park, Cudahy, and Bell Gardens—comprise SELA.⁸²¹

The SELA community is 17.92 square miles in area and is primarily residential (56%), followed by commercial (18%), industrial (14%), and transportation (5%) uses.

The primary sources of air quality concerns in the SELA community are truck traffic, freeway traffic, railyards, metal processing facilities, and various rendering and industrial facilities.⁸²² Rendering facilities take inedible livestock and other inedible materials and convert them to other products such as animal feed and cosmetics.⁸²³

Furthermore, the MAP focuses on the seven unincorporated communities in the County, including F-F.⁸²⁴ The MAP used the Environmental Justice Screening Method (ESJM) to determine the level of disadvantage across the seven communities. F-F was listed as disadvantaged in every ESJM indicator: hazard proximity, health, social vulnerability, and climate change vulnerability. F-F presented as disadvantaged under all of CalEnvironScreen 4.0 indicators as well, except for pesticide (none of the seven communities were listed): environmental burden, population characteristics, ozone, PM2.5, diesel PM, toxic releases, traffic, drinking water, lead from housing, cleanup sites, groundwater threats, hazardous waste, solid waste, asthma, low birth

⁸²⁰ Mathur and Ferrell, Are California’s Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

⁸²¹ South Coast Air Quality Management District, *Southeast Los Angeles Community Emission Reductions Plan (CERP)* (South Coast Air Quality Management District, December 4, 2020), 3a-2, https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/southeast-los-angeles/final-cerp/final-cerp.pdf?sfvrsn=f126d361_9.

⁸²² South Coast Air Quality Management District, *Southeast Los Angeles Community Emission Reductions Plan (CERP)*, 3a-2.

⁸²³ California Department of Food and Agriculture, *Rendering Program*, Meat, Poultry & Egg Safety Branch, Animal Health & Food Safety Services Division, accessed August 29, 2025, <https://www.cdffa.ca.gov/ahfss/MPES/Rendering/>

⁸²⁴ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, ES-1.

weight, cardiovascular disease, education, linguistic isolation, poverty, unemployment, and housing burden.⁸²⁵

Sources of air pollution in SELA are near homes, schools, and areas where the community gathers and lives.⁸²⁶ Interstates 105, 110, and 710 surround the SELA community. I-710 is a corridor that transports goods from the Ports of Los Angeles and Long Beach. On average, 240,000 vehicles travel on I-710 through the SELA community, with heavy-duty diesel trucks accounting for 8.7% of that total and over 90% of diesel particulate matter emissions. The SELA community is also concerned about the impact of heavy-duty trucks that are idle in their community at storage yards, fueling stations, residential areas, and the amount of traffic congestion they create.⁸²⁷

Furthermore, F-F is between 82nd and 97th percentiles on pollution burdens, according to LA County's Equity Indicators Tool.

Moreover, F-F residents report that many people in the community do not drink tap water.⁸²⁸ Finally, children have above average levels of lead in the blood in South Los Angeles.⁸²⁹ Indeed, the Exide battery recycling plant in the F-F community has exposed the community to lead and arsenic.⁸³⁰

7.5.2 Local tools to mitigate environment-related disadvantages

Local tools to mitigate air pollution

At the local level, five plans/programs—FFTODSP, the MAP, the Southeast Los Angeles Community Emissions Reduction Plan (CERP), the Community Air Monitoring Plan (CAMP), and the Green Zone (GZ) program—aim to mitigate air pollution.

While the FFTODSP, by design, supports an environment that improves the air quality in the F-F community,⁸³¹ the MAP has two environmental justice policies to protect all MAP communities from air pollution and ground contamination. The first (Policy HW/EJ1.1) seeks to develop new sensitive land uses where people work and live that reduce negative impacts on health and the environment by having appropriate setbacks, air filtration systems, and other necessary

⁸²⁵ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 3.2-1–3.2-3

⁸²⁶ South Coast Air Quality Management District, *Southeast Los Angeles Community Emission Reductions Plan (CERP)*, 5a-1.

⁸²⁷ South Coast Air Quality Management District, *Southeast Los Angeles Community Emission Reductions Plan (CERP)* 5b-1–5b-4.

⁸²⁸ Cuff, Laborde, and Chagnon, *Racial Equity in Planning for Unincorporated Los Angeles County*, 12.

⁸²⁹ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan Project: Florence – Firestone Historic Context Statement and Survey Report*, 65.

⁸³⁰ Cuff, Laborde, and Chagnon, *Racial Equity in Planning for Unincorporated Los Angeles County*, 11.

⁸³¹ County of Los Angeles Department of Regional Planning, *Florence-Firestone Transit-Oriented District Specific Plan*, 1-5.

measures. The second (Policy HW/EJ1.2) calls for the reuse and remediation of contaminated sites to residential standards, especially those closest to current residential areas.⁸³²

The County staff interviewed noted that these policies and the GZ ordinance have been applied to only a few projects in F-F because they are pretty new, and there have not been many new permit applications. Moreover, there are many legacy businesses in F-F that are difficult to reach. Many are unpermitted. Other groups have conditional use permits, of which they have a vague understanding. These legacy businesses push back on upgrades. For example, laws may require pallet yards (which are usually small and family-owned) to have a solid 6" thick wall as a barrier, to irrigate and landscape their yard, and build a real bathroom on the premises. These improvements will not occur unless there is a district attorney willing to pursue the matter and a judge willing to rule on it. Many of these small businesses also need financial help, but the LA County Department of Economic Opportunity does not have programs to assist with physical improvements.⁸³³

The CERP—developed in 2020 by SCAQMD, Community Steering Committee (CSC), and CARB with the continuous involvement of the SELA community (as required by AB 617)⁸³⁴—addresses truck and freeway emissions concerns with the following 13 action items. Notably, while the SELA community is 17.92 square miles, the study area for emissions is 32.12 square miles.

1. CARB will create a Community Pollution Enforcement Workgroup for trucks and vehicles in SELA that includes a range of stakeholders that will meet quarterly. Meetings will address community concerns, CARB enforcement, updates to the community about inspections, identify areas that need more support, etc.
2. CARB will provide educational materials and incentives to local truck companies to reduce idling.
3. CARB and SCAQMD will meet quarterly to collaborate on enforcement, findings, solicit input from the CSC, and provide them with updates.
4. Work with CSC to identify where to place “no idling” signs in the SELA.
5. Continue to create the Warehouse Indirect Source Rule (ISR) to reduce emissions from warehouses. Additionally, hold meetings and share out to the CSC.

⁸³² Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 3.2-7.

⁸³³ Rodriguez, interview by Shishir Mathur, November 19, 2025.

⁸³⁴ South Coast Air Quality Management District, *Southeast Los Angeles Community Emission Reductions Plan (CERP)*, 3a-2.

6. Small business truck owners and operators to be incentivized to use zero emissions trucks.
7. Provide SELA community with information on battery, fuel cell, and hybrid options and incentives for replacing polluting light duty vehicles.
8. Freeway projects in the SELA community to be identified and reviewed by SCAQMD for CEQA compliance.
9. Air monitoring to be conducted to track truck emissions, identify trends, and assess impact of exposure.
10. Support the creation of clean truck lanes on interstate 710.
11. Support deployment of zero emissions trucks in the SELA.
12. Catalytic converter theft prevention education in SELA led by CARB.
13. CSC and local school districts work together to identify schools that need air filtration systems due to their proximity to truck emissions.⁸³⁵

The CERP has identified a need for green spaces in the SELA community to reduce the impacts of air pollution. The CERP proposes the following four action items for this purpose:

1. Form a list of low-VOC and drought resistant trees. Work with the state, local agencies, non-profits, and the CSC.
2. Consider options for funding community green space projects through future settlement funds.
3. In collaboration with nonprofits and local and regional agencies, provide letters of support and air quality data for urban greening funding opportunities. Additionally, measure progress on tree canopy coverage in SELA.
4. Identify priority areas for freeway vegetative buffers, especially near I-710. Collaborate with CSC and the state and local agencies.⁸³⁶

In the SELA, approximately 130 metal processing facilities are located in the emission study area. Metal processing operations can lead to toxic air pollutant emissions. Additionally, these facilities

⁸³⁵ South Coast Air Quality Management District, Southeast Los Angeles Community Emission Reductions Plan (CERP), 5a-1.

⁸³⁶ South Coast Air Quality Management District, *Southeast Los Angeles Community Emission Reductions Plan (CERP)*, 5d-1–5d-2.

are sources of debris, odors, and noise in the SELA community. The CERP has several action items to address the elimination of these concerns and risks, as listed below.

1. Provide the public with plain language materials and a public workshop with information on metal processing types and rules on regulating those facilities.
2. Create rules and regulations for house-keeping and best practices at metal recycling plants to reduce emissions.
3. With the CSC and local land use agencies, identify metal processing facilities in the SELA emission study area and list applicable SCAQMD rules, provide compliance history of the facilities, and share emission and air monitoring information near the facilities.
4. Identify toxic metal air pollution sources of emissions through air monitoring.
5. Refer to relevant agencies when issues are identified during inspections that may be outside of the purview of SCAQMD.
6. Provide outreach on metal processing facilities on required SCAQMD permits, in collaboration with local land use agencies.
7. Work with community groups that work with schools to develop e-mail notifications for schools and other sensitive groups and provide updates on the progress to the CSC biannually.⁸³⁷

Moreover, the SELA community's emissions study area has three railyards. A section of the Alameda Corridor (a freight rail corridor) is also in the SELA community. The corridor runs from both the Long Beach and Los Angeles Ports to Downtown Los Angeles. The CERP has eleven action items to address community concerns.

1. Air monitoring near railyards and the community to measure railyard-related emissions in the community.
2. Identify strategies to reduce railyard emissions using air monitoring data.
3. Develop the Railyard ISR to identify strategies to reduce emissions impacts.
4. With the use of the Railyard ISR and the development of incentive programs, replace diesel equipment for lower emissions options.

⁸³⁷ South Coast Air Quality Management District, *Southeast Los Angeles Community Emission Reductions Plan (CERP)*, 5e-1–5e-3.

5. CARB will present the Trucks Transport Refrigeration Unit (TRU) Regulation to the Board. TRUs to be replaced by zero emission refrigerants.
6. CARB will present to the Board the regulation to replace drayage trucks to zero emission by 2035.
7. CARB will present to the Board the regulation for cleaner locomotives statewide.
8. CARB will present to the Board the regulation for cleaner cargo equipment and facility infrastructure requirements at ports and railways.
9. TRU regulations and inspections will be prioritized by CARB in the SELA community. CARB will provide semi-annual reports on compliance to the CSC.
10. Cargo Handling Equipment enforcement will be prioritized by CARB in the SELA community by conducting annual audits on total regulated trucks and compliance rates by rail yard.
11. CARB and SCAQMD to work together on community outreach on locomotive compliance as well as how to file a complaint.⁸³⁸

Finally, the SELA and emission study area has approximately 200 industrial facilities. The community is concerned about the impact of facilities that produce the following sources of emissions: oil, gas, chemicals, autobody shops, construction, waste transfer stations, debris from wood and glass, and VOC. The CERP has four action items to address industrial facilities emissions concerns.

1. Create a handout that has information on what industrial facilities exist in the emission study area and if air monitoring is currently being conducted. Additionally, collaborate with CARB to hold a yearly community workshop to educate the community on Criteria Pollutant and Toxic Emissions Reporting (CTR) and share collected data on the facilities in the area. The SCAQMD and CARB are responsible for interpreting the data to the community.
2. Collaborate with CSC and local agencies, such as the LA County Industrial Use Task Force, to address community concerns. Provide SCAQMD rules for industrial facilities and provide compliance history of the facilities, summary of emissions, and air monitoring data near facilities.

⁸³⁸ South Coast Air Quality Management District, *Southeast Los Angeles Community Emission Reductions Plan (CERP)*, 5e-1, 5f-1–5f-3.

3. Work with CSC on identifying priority air monitoring, emissions reduction measures, and identify financial incentives to adopt technologies that go beyond the rule requirements.
4. In the annual CERP report, identify reduction measures for emissions and exposure to the SCAQMD Governing Board to be able to act on them.⁸³⁹

The CSC and SCAQMD partnered to create the fourth plan, CAMP, in 2020 for the SELA community. CAMP includes strategies for air pollution monitoring in areas identified by the CSC. The air monitoring data informs the sources of pollution, the types of pollutants, and how these pollutants affect the community. These data can be used to track progress on CERP strategies. CAMP and CERP are separate plans, but they work in tandem. This combined effort provides SELA with multiple methods for monitoring air quality.⁸⁴⁰

Finally, in 2021, the LA County Board of Supervisors approved Green Zones plans for eleven unincorporated communities in the county that experience high levels of pollution, including F-F.⁸⁴¹ The purpose of the Green Zones (GZ) Program is to improve the health of communities that are near sources of pollution. The goal of the GZ is to use land-use tools and strategies to establish development requirements that prevent industrial and manufacturing land uses from being located near residential, school, and other sensitive areas where the community lives. The GZ Program-related goals and policies have been included in the LA County general plan, under the environmental justice element. The GZ Program has stricter regulations for recycling and solid waste facilities to reduce pollution that comes from processing materials at these sites.⁸⁴²

The community organizer interviewed for this study noted seeing the implementation of GZ in F-F. It reduced the timeline for conditional use permit renewals from 30 years to about 5–10 years. GZ applies when people pull new permits or renew existing ones. It also requires on-site tree planting and greenery. However, there are instances of stolen trees and uprooted grass taken. So, the neighborhood condition/context needs to be considered while implementing the policy.⁸⁴³

⁸³⁹ South Coast Air Quality Management District, *Southeast Los Angeles Community Emission Reductions Plan (CERP)*, 5e-1, 5t-1–5g-2.

⁸⁴⁰ South Coast Air Quality Management District, *Southeast Los Angeles Community Emission Reductions Plan (CERP)*, 6-1.

⁸⁴¹ Elizabeth Marcellino, "With Green Zones, San Gabriel Valley, Southeast, East LA Find Hope in Tackling Industrial Pollution," *San Gabriel Valley Tribune*, December 21, 2021, <https://www.sgvtribune.com/2021/12/21/with-green-zones-san-gabriel-valley-southeast-east-la-find-hope-in-tackling-industrial-pollution/>.

⁸⁴² Los Angeles County Department of Regional Planning, *Green Zones Program Implementation Guide* (Los Angeles: Los Angeles County Department of Regional Planning, October 2022), 3-4, https://planning.lacounty.gov/wp-content/uploads/2022/10/green-zones_implementation-guide.pdf.

⁸⁴³ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

Local tools to mitigate ground pollution

LA County Public Works is guided by the Low Impact Development Manual and the Green Infrastructure Guidelines to manage stormwater quality and runoff impacts. These guidelines will be followed in the development of the FFTODSP.⁸⁴⁴ The community organizer interviewed for this study noted that these policies only apply to large-scale projects.⁸⁴⁵

Tables 7.4, 7.5, and 7.6 note the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various environmental disadvantages.

⁸⁴⁴ County of Los Angeles, *Metro Area Plan and Appendices*, 6.7.

⁸⁴⁵ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

Table 7.4 F-F: Strategies to Mitigate Ground Pollution

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
	PDA	County/Regional	State	Federal
Proper landfill design.	NA			
Laws and penalties to prevent contamination.	Not enforced. ⁸⁴⁶	Not enforced. ⁸⁴⁷		NPDES: requires a permit for wastewater discharge.
Identify and isolate contaminated zones.	No zones identified. Alameda and Slauson Avenue Corridors have a high degree of industrial development. So, there is probably soil contamination there. ⁸⁴⁸			
Prevent soil erosion.	NA			
Reduce sediment-containing surface runoff.	NA			
Monitoring and inspection of polluting sources (e.g., septic, fuel, and chemical tanks).	Just gas station monitoring. ⁸⁴⁹			NPDES: quality and monitoring requirements.
Control uses in the aquifer recharge areas.	NA			
Educational campaigns.				
Prevent sea level rise.	NA			

⁸⁴⁶ Rodriguez, interview by Shishir Mathur, November 19, 2025.

⁸⁴⁷ Rodriguez, interview by Shishir Mathur, November 19, 2025.

⁸⁴⁸ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁴⁹ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

Table 7.5 F-F: Strategies to Mitigate Children’s Exposure to Lead

Literature	Used/noted in local, regional, and state plans		
	PDA	County/Regional	State
Strong lead poisoning prevention programs: universal screening and public education.			Childhood Lead Poisoning Prevention Acts; Residential Lead-Based Paint Hazard Reduction Act; and State civil and health codes: buildings with lead hazards are in violation of State housing laws.
Identify and eliminate sources of lead contamination (e.g., paint and water pipes).			Childhood Lead Poisoning Prevention Acts.
Remove structural racism: job creation, small business development, affordable housing, and improved social cohesion.	See tools under the socio-economic dimension.		

Table 7.6 F-F: Strategies to Mitigate Air Pollution

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
	PDA	County/Regional	State	Federal
Legislation (e.g., US Clean Air Act); emission taxes; and policies and programs.		MAP Green Zones; SELA; CERP; and CAMP.	CARB policies and programs; and State laws, such as SB 535, and AB 617.	Clean Air Act.
Economic tools and incentives: subsidies for pollution abatement; and emissions trading, banking, and caps.	Not implemented in F-F. ⁸⁵⁰	SELA CERP CAMP; and Connect SoCal 2024 clean-air-related policies.	CARB policies and programs; and State laws, such as SB 535, and AB 617.	Congestion Mitigation and Air Quality Funds; and Climate Pollution Reduction Grants.
Enhanced air pollution monitoring and modeling.	Not implemented in F-F. ⁸⁵¹	CAMP and CERP.	CARB policies and programs; and State laws, such as SB 535, and AB 617.	EPA Ambient Air Monitoring.
Road-side vegetation and greening.	FFTODSP urban greening. But not implemented in F-F. ⁸⁵²	CERP and urban greening.		
Reduce emissions by transport sector: promote electrification and EVs; dissuade auto use; promote non-auto use; and higher emissions and fuel standards.	Nothing around trucking or other heavy industrial uses. Only electric and hybrid are state/county/city fleets. No development of charging stations. ⁸⁵³	MAP, CERP, CELA; and SoCal 2024 clean transportation-related policies.	CARB policies and programs; and State laws, such as SB 535, and AB 617.	Congestion Mitigation and Air Quality Funds; and Clean Air Act.
Reduce emissions by the energy sector: clean and	Nothing around trucking or other heavy industrial	CERP and CELA.	CARB policies and programs; and State laws,	Clean Air Act.

⁸⁵⁰ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁵¹ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁵² Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁵³ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
renewable energy sources, cleaner industrial production, higher emission standards, monitoring of air pollution by industries, and elimination/relocation of polluting industries.	uses. Only electric and hybrid are state/county/city fleets. No development of charging stations. ⁸⁵⁴		such as SB 535, and AB 617.	

7.6 Transportation Dimension (sub-dimensions TR1, TR2, TR3, TR4, and TR5)

7.6.1 Summary of disadvantages

Mathur and Ferrell (2024) identified moderate levels of disadvantage under TR1 (household level mobility) and TR2 and TR3 (local ped/bike and transit accessibility), while they noted high levels of disadvantage under TR4 (overall local/neighborhood accessibility) and no disadvantage under TR5 (regional transit accessibility).⁸⁵⁵

Indeed, the LA County Vision Zero Action Plan identified corridors where several severe injuries have occurred recently. They are called Collision Concentration Corridors (CCC). Several CCCs were identified in F-F: Firestone Boulevard, Alameda Street, 92nd Street, Slauson Avenue, Hooper Avenue, Compton Avenue, Gage Avenue, Florence Avenue, Nadeau Street, Santa Fe Avenue, and Pacific Boulevard. Firestone Boulevard, Alameda Street, and 92nd Street were in the top 20 CCCs in the county.⁸⁵⁶

7.6.2 Local tools to mitigate transportation-related disadvantage

Five plans focus on reducing F-F's transportation disadvantage. These include FFTODSP, the Los Angeles Metro's Rail to Rail/River Active Transportation Corridor project, MAP, the

⁸⁵⁴ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁵⁵ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

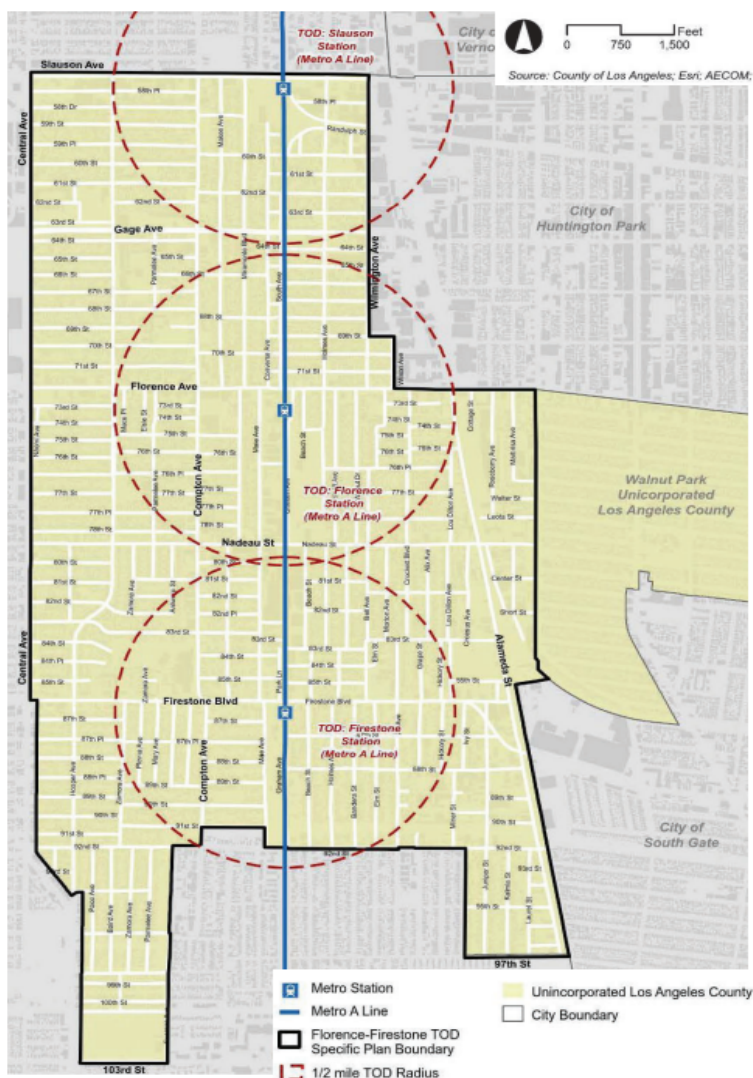
⁸⁵⁶ "Step by Step: Chapter 13 – Florence–Firestone Community Pedestrian Plan," *Step by Step*, Los Angeles County Department of Public Health, accessed September 25, 2025, 478, http://www.publichealth.lacounty.gov/place/stepbystep/docs/final/Step%20by%20Step_Chapter_13_Florence_Firestone_Community_Pedestrian_Plan.pdf.

Florence-Firestone Community Pedestrian Plan, and the Los Angeles Countywide Sustainability Plan.

FFTODSP

The FFTODSP planning area is served by 12 bus routes and the Metro A Line. Slauson Station, Florence Station, and Firestone Station are on the Metro A Line that provides regional access to Downtown Los Angeles, LAX International Airport, Southeast LA, Willowbrook/Watts area, Marina del Rey, Playa del Ray, and Playa Vista.⁸⁵⁷

Figure 7.3 A map of the FFTOD Specific Plan and TODs⁸⁵⁸



⁸⁵⁷ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 5-5.

⁸⁵⁸ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 1-1.

The FFTODSP focuses heavily on increasing local and regional accessibility by encouraging compact, walkable, and bikeable developments near transit stations. Specifically, the FFTODSP suggests TODs within a half-mile radius of Metro rail stations. The purpose of these TODs is to create housing, jobs, community amenities, and active transportation in these communities.⁸⁵⁹

Furthermore, the FFTODSP reports that F-F households are less likely to have cars compared to the rest of LA County; as a result, F-F residents make fewer trips by car.⁸⁶⁰ The Vehicle Miles Traveled (VMT) for residents and employees in F-F is 30.2 per day. The FFTODSP anticipates that this will be reduced to 20.3 by 2035 if the plan is implemented as planned.⁸⁶¹

However, the community organizer interviewed for this study noted that the mode share between the auto and transit users has not changed. Therefore, most likely, VMT has not been reduced.⁸⁶²

The FFTODSP also encourages collaboration between the Metro Mobility Hubs team and the County to install bikeshare stations and mobility hubs near station areas and along commercial corridors in F-F. The plan encourages electric bicycles to be made accessible at mobility hubs to allow for people of all bike riding abilities to have access.⁸⁶³ However, the community organizer interviewed for this study notes that mobility hubs have not been developed in F-F thus far.⁸⁶⁴

The FFTODSP's Complete Street Strategies aim to make existing roadways comfortable to all modes of transportation by installing signs and improving wayfinding, implementing traffic calming measures, and implementing a TDM program. The plan identifies several locations as areas in need of traffic calming.⁸⁶⁵ The community organizer interviewed for this study noted that the County Public Works and Public Health departments reached out to non-profit organizations to conduct walking audits to understand the needs better and to identify solutions. However, he has not seen projects come out of this audit yet.⁸⁶⁶

In the FFTODSP Mobility chapter, a summary of existing conditions found that four major arterials: Slauson Avenue, Florence Avenue, Firestone Boulevard, and Compton Avenues had the

⁸⁵⁹ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 1-1.

⁸⁶⁰ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 5-2.

⁸⁶¹ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 5-1.

⁸⁶² Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁶³ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 5-15.

⁸⁶⁴ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁶⁵ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 5-19.

⁸⁶⁶ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

highest movement from cars, trucks, transit vehicles, and pedestrians. The four arterials were identified as high-collision areas, especially Compton Avenue, where vehicle speeds were recorded above the posted speed limit. The Specific Plan Area has high speeds and insufficient bike and pedestrian infrastructure. Pedestrian crossings across major arterials are few, creating unsafe crossing conditions. Transit services have long headways in a community where few people have access to vehicles. Recommendations based on these findings include improving pedestrian, bicycle, and transit mobility in the community and aligning with County Vision Zero and Safe Routes to School programs. Parking for current communities and new developments need to be identified and aligned with the future multi-modal transportation investments.⁸⁶⁷ The community organizer interviewed for this study noted hearing conversations around such recommendations, but has not seen any projects come out of them, except the walk audit of Compton Avenue.⁸⁶⁸

Florence Avenue has most commercial and pedestrian activity in F-F and is known as the Florence Mile.⁸⁶⁹ The FFTODSP envisions the Florence Mile becoming a mixed-use corridor with retail, restaurants, and housing.⁸⁷⁰ The plan also notes that the Slauson Station Access Point needs a formalized pedestrian pathway that connects the neighborhood south of the station where there is an informal pedestrian path.⁸⁷¹

To further improve local and regional accessibility, the FFTODSP supports high-density affordable housing around the Metro Blue Line Stations to promote jobs and community amenities.⁸⁷² The Slauson Station TOD area concept supports mixed-use housing, jobs, and retail near the station. The plan would redevelop the industrial and commercial properties that currently exist in the area. These areas are identified as “TOD Mixed-Use/Job Areas.”⁸⁷³ Hence, efforts align with the plan’s goal of providing diverse, quality work opportunities in the community, which it seeks to implement by promoting transit centers as locations for job, retail, and multifamily housing development.⁸⁷⁴

⁸⁶⁷ County of Los Angeles Department of Regional Planning, *Florence-Firestone Transit-Oriented District Specific Plan*, 5-1–5-2.

⁸⁶⁸ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁶⁹ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan Project: Florence – Firestone Historic Context Statement and Survey Report*, 48.

⁸⁷⁰ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 5-1–5-6.

⁸⁷¹ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 5-22.

⁸⁷² County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 2-2.

⁸⁷³ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 3-5.

⁸⁷⁴ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 4-19.

Rail to Rail/River Active Transportation Corridor project

Another project—the Los Angeles Metro’s Rail to Rail/River Active Transportation Corridor project—would use 10 miles of underutilized railroads for pedestrian and bicycle use and be within the FFTODSP along Slauson Avenue.⁸⁷⁵ The community organizer interviewed for this study noted that this project has been completed.⁸⁷⁶

MAP

One of the MAP’s goals is to develop TODs by developing mixed-use, high-quality housing; creating jobs; providing attractive, safe community amenities; and developing an active transportation network. Within this goal are the following policies: (1) Prioritize complete streets in the TOD Specific Plan areas; (2) Support economic growth with mixed-use corridors on Nadeau Street, Holmes Avenue, Compton Avenue, and Florence Avenue by providing housing, jobs, and services to the community near the Metro A Line; (3) Unbundle parking for mixed-use housing areas by separating parking costs and rent to support affordability; (4) Re-envision the Slauson Avenue Station TOD through other related plans such as the Metro’s West Santa Ana Branch transit line, the Rail-to-Rail and Rail-To-River; (5) Allow for some low- to medium-density housing within a half-mile area of the Firestone Metro A Line stations through the Firestone Station Neighborhood Housing Options; and (6) Improve Slauson Station Access to the future West Santa Ana Branch and Rail-to-Rail plan.⁸⁷⁷

The community organizer interviewed for this study noted that there is very little movement toward achieving this goal. The County has added some traffic calming measures along Miramonte Avenue. The corridors for further improvements have been identified. Conversations are at the county level with Public Works, BOS, and sometimes with CBOs.⁸⁷⁸

To further promote non-auto transportation modes, MAP has maintenance goals for the beautification and safety at bus and rail stations and corridors. In partnership with Metro, the MAP has policies to have trees, furniture, protection from the elements, art, and other amenities to increase comfort and attractiveness.⁸⁷⁹ The community organizer interviewed for this study

⁸⁷⁵ County of Los Angeles Department of Regional Planning, *Florence–Firestone Transit-Oriented District Specific Plan*, 2-1.

⁸⁷⁶ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁷⁷ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 4.17–4.18.

⁸⁷⁸ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁷⁹ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 3.3-8.

noted that there are beginnings of some movement around these goals. Trees and shade structure and devices providing shade are parts of a grant initiative that FFCO is working on.⁸⁸⁰

There are additional goals to minimize the perception of crime near transit stops.⁸⁸¹

The community organizer interviewed for this study noted no movement toward these goals. However, he noted that the County Sheriff's department is very responsive to community concerns. So, there is an opportunity to build on that relationship.⁸⁸²

A policy specific to Florence Station is to provide safe pedestrian crosswalks at grade.⁸⁸³

The community organizer interviewed for this study noted that no such improvements have been made. There are pedestrian crossings at grade that predate the plans. But they are not being made safer—for example, there is no high-visibility signage. The new large housing developments in proximity to the Florence Station are another justification for better crosswalks.⁸⁸⁴

Florence–Firestone Community Pedestrian Plan

The Florence–Firestone Community Pedestrian Plan, developed in 2023, proposes projects on several major corridors, some of which are CCCs. Moreover, numerous crossing projects are suggested such as installing high-visibility crosswalks, wayfinding and signage, traffic calming measures, rapid flashing beacons, bus bulbs, and sidewalks.⁸⁸⁵ The plan suggests an action item for Vision Zero, which is to establish a Safe Routes to School Program that provides safety education and encourages walking and biking to school for students in F-F.⁸⁸⁶

The community organizer interviewed for this study noted that no capital improvements have been undertaken. However, the County, CBOs, and allies are aware of these corridors. FFCO has undertaken pedestrian safety-oriented projects. For example, they conducted a public space walk audit with LA County Vision Zero and LA Walk. So, there is awareness of where to focus, but the County should start construction.⁸⁸⁷

⁸⁸⁰ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁸¹ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 3.5-5.

⁸⁸² Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁸³ Los Angeles County Department of Regional Planning, *Los Angeles County Metro Area Plan and Appendices*, 4-17.

⁸⁸⁴ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁸⁵ “Step by Step,” 505–506.

⁸⁸⁶ “Step by Step,” 550.

⁸⁸⁷ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

Los Angeles Countywide Sustainability Plan

One of the Los Angeles Countywide Sustainability Plan's goals is to reduce car dependency by promoting TODs and affordable non-auto transportation systems that are safe, convenient, and attractive.

Furthermore, the Sustainability Plan's suggests reducing VMT by increasing the non-auto mode share from 11% to 50% by 2045 and reducing the average per capita VMT (which averaged 219 miles per capita in 2017) by 10 miles per capita.⁸⁸⁸ To implement this strategy, the following actions are proposed: (1) Local jurisdictions such as the City of LA and the Metro to develop a "Transit First" policy and mobility advocacy plan that supports the County's Vision Zero Plan; (2) Support the Metro's plans to study congestion pricing and evaluation of equity; (3) Bus-only lanes and signal prioritization in major thoroughfares and bus rapid transit infrastructure implementation in priority corridors; (4) Development of a parking reform strategy that removes parking minimum requirements for new residential units, implement parking maximums near high quality transit stops, establish parking benefit districts, and incentivize developers to create less parking than maximum allowance; (5) Provide students, seniors, youths, disabled, and low-income individuals free transit passes; (6) Develop a TDM ordinance that subsidized transit passes, car share, and similar measures are required from developers; (7) Proactively create a transportation technology strategy for tech related mobility that can support public transit and the County plan's goals; (8) Explore demand-based priced parking at County facilities and streets; and (9) Pilot alternative work site for County employees.⁸⁸⁹

Another strategy is to improve transportation safety. The County's baseline data for 2015 was 618 traffic-related fatalities, including 101 in unincorporated areas. The goal is to have zero fatalities. The corresponding actions are as follows: Apply the County's Vision Zero Action Plan in unincorporated areas to reduce traffic-related injuries and fatalities; develop active transportation plans that include all physical abilities, provide comfort and safety, and incentivize cities to work collaboratively.⁸⁹⁰

For the latter, one goal is to plan for equitable, sustainable land use and development without displacement. The corresponding transportation strategy is to implement TOD. Baseline data from 2012 found that 1.5 million households, or approximately 47% of all households in LA

⁸⁸⁸ Our County, *Our County: Final Plan* (Los Angeles, CA: Our County, July 2019), 118, <https://ourcountyla.org/wp-content/uploads/2019/07/OurCounty-Final-Plan.pdf>.

⁸⁸⁹ Our County, *Our County: Final Plan*, 119–122.

⁸⁹⁰ Our County, *Our County: Final Plan*, 120–122.

Regional tools

In 2019, SCAG reported that car ownership had increased due to greater accessibility and affordability of cars, affordable gas prices, and an oversupply of parking. The cost of housing was also a contributing factor, as people move further away from their jobs, car dependency increases.⁸⁹² SCAG suggests that private carshare options could provide a solution to reducing car ownership.⁸⁹³ For example, Los Angeles has a program called Blue LA that provides electric vehicle carshare options in low-income areas in the city.⁸⁹⁴ SCAG is also interested in exploring is Mobility-as-a-Service (MaaS) or Mobility on Demand (MOD). On one platform, a user would be able to plan, obtain trip data, make decisions, and pay for multiple modes of transportation for a trip.⁸⁹⁵

Tables 7.7, 7.8, and 7.9 note the presence of PDA-, county/regional-, state-, and federal-level tools to mitigate various transportation disadvantages.

⁸⁹² Southern California Association of Governments, “Transportation Demand Management (TDM) Strategic Plan and Final Report (May 2024),” accessed July 8, 2025, Appendix D, 28, https://scag.ca.gov/sites/default/files/2024-05/tdm-strategic-plan_scag.pdf.

⁸⁹³ Southern California Association of Governments, “Transportation Demand Management (TDM) Strategic Plan and Final Report (May 2024),” Appendix G, 14.

⁸⁹⁴ Southern California Association of Governments, “Transportation Demand Management (TDM) Strategic Plan and Final Report (May 2024),” Appendix G, 14.

⁸⁹⁵ Southern California Association of Governments, “Transportation Demand Management (TDM) Strategic Plan and Final Report (May 2024),” Appendix C, 19-20.

Table 7.7 F-F: Strategies to Enhance Local Accessibility (Dimensions 1 to 3)

Literature	Used/noted in local, regional, state, and federal plans; and interview notes			
	PDA	County/Regional	State	Federal
Investments in transit.	FFTODSP	General Plan TOD; and Connect SoCal 2024 PDA policies.	Free Fares for School; Safe Routes to School; and TDA, Prop 1B, and Prop 116.	
Investments in walk/bike infrastructure.	FFTODSP, F-F Pedestrian Plan; and Bike lanes installed over a decade ago—for example, on Hooper which is a major N-S street. But it is not a protected bike lane, not even painted. Elsewhere in F-F too walk/bike infrastructure would benefit from redesign to increase usability and safety. ⁸⁹⁶	Connect SoCal 2024 Complete Streets policies; and Connect SoCal 2024 TDM policies.	Safe Routes to School ATP Clean Mobility Options for Disadvantaged Communities; and California Complete Streets Act of 2008.	FTA TOD Program; and CMAQ.

⁸⁹⁶ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

Table 7.8 F-F: Strategies to Promote Overall Local/Neighborhood Accessibility (Dimension 4)

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
	PDA	County/Regional	State	Federal
Traffic calming and other TDM measures.	FFTODSP. Very little implementation on the ground. For example, there are roundabouts on Miramonte Blvd., which are poorly designed. They do not slow down traffic. They are just 1–1.5 inch high. People drive over them. There are no landscaping, trees, or signages. ⁸⁹⁷	Connect SoCal 2024 Complete Streets policies; and Connect SoCal 2024 TDM policies.		Congestion Mitigation and Air Quality Funds; MAP-21; and Safe Streets For All (SS4A).
Tools to increase density and land use diversity, such as compact and mixed-use infill TODs.	FFTODSP; and freeway cap parks, vision zero, and safe routes to school.	MAP goal 13.	California HCD TOD Housing Program – build homes near transit; California HCD Infill Infrastructure Grant Program AHSC; and SB79, AB1244, and SB358.	FTA TOD.

⁸⁹⁷ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

Table 7.9 F-F: Strategies to Promote Regional Accessibility (Dimension 5)

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
	PDA	County/Regional	State	Federal
Regional land use planning.	FFTODSP (improving Metro A line stations).		AB32, SB375, and Density Bonus Law.	
Corridor planning.	FFTODSP “Florence Mile”; and Central Avenue. Looking to invest in all major corridors under Corridors 2 Community initiative by the District 2 Supervisor. ⁸⁹⁸		AB 2011	
Job/housing balance & match.	FFTODSP. Significant housing concentration in F-F, but not much of matching jobs to housing. Industrial workers living in F-F are not living in the newly developed affordable housing developments. ⁸⁹⁹	LA County Housing.	AHSC; High Road Training Partnership (jobs closer to home); RHNA numbers determined by CA Dept of Housing and Community Development; AB2864; CA HCD Jobs-Housing Balance Incentive Grants; Inter-Regional Partnership program; and CA Govt Code: Section 65890.1, Section 65890.3, and Section 65890.5.	
Provision of affordable housing.	FFTODSP	ADU laws; Density bonuses; LA County GP’s Housing Element; MAP; and SoCal 2024’s housing-related policies.	AHSC; Community Housing Development Organizations; Permanent Local Housing Allocation Program Non-Entitlement Local Government grant to fund California to assist homeless individuals; and REAP.	LIHTC, CDGB, HOME, and vouchers

⁸⁹⁸ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁸⁹⁹ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

Literature	Used/noted in local, regional, state, and federal plans; and interviews			
			CalHFA Programs; tax credit program and affordable housing legislation (see table under economic dimension); SB 375; and Density Bonus Law.	
Diverse employment options within DACs.			High Road Workforce Training.	
Transit accessibility to diverse employment options outside DACs.	FFTODSP (some regional goals). Through the three light rail stations and buses. But there is no targeted programming. ⁹⁰⁰	Connect SoCal 2024 PDA policies; and Connect SoCal 2024 Transit and Multimodal Integration policies.		

7.7 Case Study Analysis

7.7.1 Socio-economic dimension

F-F demonstrates high levels of disadvantage under both sub-dimensions—concentration of racial minorities and of single-parent households.

F-F has faced decades of neglect, and it is only recently that the County has started to take a more coordinated approach towards this community. Among the four literature-suggested tools noted in Table 7.1, all are being implemented or apply to some extent in F-F. The most common are housing-related tools, which are advocated in FFTODSP, MAP, and the County's general plan's housing element. However, FFTODSP and MAP were very recently developed—in 2023 and 2024, respectively—and the HE provides only high-level guidance. Moreover, FFTODSP and MAP were developed with little community input.⁹⁰¹

Due to the plans' recency, many of the programs listed in them, such as the vacant land activation, the Commercial Corridor Legacy Business Retention Program, and the Community Benefits Program, have not yet been implemented. Moreover, the County's efforts to broaden F-

⁹⁰⁰ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

⁹⁰¹ Pacheco Bell, interview by Shishir Mathur, October 3, 2025.

F's economic base by moving from heavy industry have met with resistance from a community that has historically relied on such industries for well-paying middle-class jobs.

Finally, on several aspects, such as preservation of historical resources, the County staff and the community differ in their perception of the need for action. On a positive note, County tools such as AHPO and rent stabilization ordinances have helped prevent displacement. Overall, the efforts to mitigate socio-economic disadvantage are a mixed success at best.

7.7.2 Educational dimension

F-F has high levels of disadvantage in both sub-dimensions—ED1 (overall low level of education) and ED2 (low-quality K–12 education).

There is scant evidence that tools to enhance the overall education quality of the community or the quality of K–12 education are effectively mitigating F-F's education-related disadvantages. Many such tools are available only at the county or state level, and their effectiveness cannot be assessed through document analysis or expert interviews.

7.7.3 Environmental dimension

F-F faces severe air and groundwater pollution and risk of lead exposure to children.

While several tools are in place to mitigate these environmental disadvantages, our research suggests they are largely ineffective in mitigating such disadvantages in F-F. Many well-meaning tools, such as the GZ program, are either too new, ineffective in the context of the F-F, or lack supporting policies (for example, there is little financial assistance for industrial owners to implement mitigation measures). In some cases, the tools do not exist. For example, there is no evidence of the use of the following tools to mitigate air pollution in F-F: economic tools and incentives such as subsidies for pollution abatement, emissions trading, banking, and caps; and enhanced air pollution monitoring and modeling.

7.7.4 Transportation dimension

F-F has moderate levels of disadvantage under TR1 (household level mobility) and TR2 and TR3 (local ped/bike and transit accessibility). In contrast, it has high levels of disadvantage under TR4 (overall local/neighborhood accessibility) and no disadvantage under TR5 (regional transit accessibility).

F-F has 12 bus stops and three Metro light rail stations, providing it with good regional accessibility. However, local accessibility in the form of bike/walk infrastructure is highly inadequate. Several tools exist to enhance local accessibility, but they are either not being implemented or are in initial scoping stages. A couple of the literature-suggested tools to

enhance regional accessibility—job-housing match and diverse employment options within the community—are not being implemented. The new multi-story affordable housing projects being developed are not a good match for existing residents, though permissive ADU and density bonus laws could help. The efforts to diversify the employment options have met with community opposition.

8. Case Study Synthesis and Conclusions

This study first reviewed the GIS files prepared by Mathur and Ferrell (2024)⁹⁰² that overlaid the location of PDAs/PGAs/SOIs on socio-economic, educational, environmental, and transportation-related disadvantages to identify the four most disadvantaged DACs—two each in the SoCal and S.F. Bay Area regions—that also have the potential to take on new development in the form of greenfield development or redevelopment of existing areas. These are NR and WO in the S.F. Bay Area and Bloomington and F-F in SoCal.

Next, the study collated the literature-suggested tools to mitigate community-level disadvantages across the social, economic, educational, environmental, and transportation dimensions. After that, through document analysis and in-depth, semi-structured stakeholder interviews, it: (a) documented the various kinds of disadvantages faced by the case study DACs under the above-noted dimensions and (b) qualitatively assessed the presence and effectiveness of the tools to mitigate the disadvantages.

This chapter first presents the major findings/takeaways from this research, in the process highlighting the similarities and differences among the various case study DACs, where applicable. It then provides the study's major recommendations. It concludes by noting the study's limitations and identifying future research opportunities.

8.1 Major Study Findings/Takeaways

8.1.1 Legacy DACs, except Bloomington

Except for Bloomington, which has faced major environmental pollution since the advent of warehousing and trucking in the last 2-3 decades, the other three case study DACs have a long legacy as DACs. Their current designation as PDAs/PGAs/SOIs is likely to worsen the disadvantages, given the inconsistent efforts to mitigate existing disadvantages and to foresee and plan to mitigate the new ones, such as gentrification-led displacement.

8.1.2 All DACs have a large majority of non-white population

All case study DACs have a majority non-white population, and except WO, all have a Hispanic-majority population. Moreover, except Bloomington, all were previously Black-majority. Furthermore, except for Bloomington, all the other were historically industrial areas that also housed industrial workers, with two, NR and F-F, continuing that legacy.

⁹⁰² Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

8.1.3 Location in unincorporated county areas

The popular notion is that DACs are in inner-city areas of large cities. However, except for WO, three case study DACs are in unincorporated counties (including NR, which is largely in an unincorporated county area with a small portion in the City of Richmond).

DACs in unincorporated areas present multiple challenges from a political/organizational perspective. DACs, even when they are large in size and population, such as F-F, which has approximately 60,000 residents, usually comprise a small portion of the unincorporated county area and their county board of supervisors' district, putting them at a political disadvantage where they often lack political champions. Furthermore, they don't receive close, focused attention from county government departments, which are usually stretched too thin, have scarce financial resources, or are usually not equipped to provide urban-level services. For example, the study team could not find a single contact person at the LA County Planning Department knowledgeable about all planning and development activities in F-F.

From a policy perspective, too, being a small part of an unincorporated county puts DACs at a disadvantage, as county-wide policies, not those tailored to DACs, are usually adopted and implemented. For example, in its efforts to meet aggressive RHNA numbers, LA County has been promoting dense housing in F-F around transit stations. While this housing is largely below-market rate, it is multi-family—not the housing type desired by its predominantly single-family residents. Furthermore, the county attempted to rezone heavy industrial parcels to less intensive industrial uses, but met with resistance from local businesses. Finally, in the case of Bloomington, the county and the neighboring cities' governments continue to promote warehouses while neglecting to address Bloomington residents' and their CBOs' pollution and transportation safety-related concerns.

On a related note, while all the case study DACs comprise a large number of single-family homes, primarily compact multi-family developments are planned in them. In the case of WO, the new market-rate multi-family housing developments raise gentrification concerns in a predominantly working-class single-family community. In Bloomington, many existing residents moved there to enjoy a more rural lifestyle and push back on efforts to provide new multi-family housing by opposing sewer upgrades, hoping that a lack of sewer infrastructure will deter new development.

8.1.4 Several tools exist to mitigate disadvantage but their implementation or efficacy at the DAC-level is sparse

According to the literature and confirmed in our case studies, employment and workforce development tools are the most popular means of mitigating socio-economic disadvantage. But they are primarily in the form of plans and policies at the county, regional, or state levels, with little evidence of their meaningful impact at the DAC level.

Provision of community-relevant affordable housing is sparse, except for the redevelopment of the Delta housing project in NR and a couple of affordable housing developments in Bloomington. However, DAC-level plans, such as WOSP, NR QOL Plan, and VCSP, have ambitious housing-related policies, supporting the notion that DAC-based CBOs are most effective at identifying and addressing DAC concerns.

Finally, while some efforts are being made, mainly at the DAC level, to improve access to healthy foods (such as the NR farm, farmers markets, and food banks), the impact is meaningful but nonetheless low. None of the case study DACs has a grocery store selling fresh produce.

The DAC case studies also face significant education-related disadvantages. The quality of K–12 education and the overall level of education in the DACs are low. While several programs exist to support K–12 education, especially at the state and federal levels, the quality of K–12 education remains low. Moreover, the inability to secure interviews from school districts’ superintendents where the case study DACs are located hampered this study’s ability to assess the effectiveness of these programs. The interview questions were developed to seek the interviewees feedback on the relevance and effectiveness of various local, regional, state, and federal programs to improve the quality of K–12 education.

The most common tools to increase overall education at the DAC level include workforce training and small-business incubation, but they are not sufficient to effectively address the underlying low educational levels in these communities.

The case study DACs face significant environmental disadvantages. Several plans and policies typically exist at the city, county, regional, state, and federal levels; however, their impact at the DAC level in the form of actionable projects is sparse. Often, the most proactive measures include actively tracking air pollution (in the case of WO and F-F). Alarming little is being done to reduce children’s exposure to lead, especially given the old housing stock in all the DACs. In a similar vein, while ground (including groundwater) contamination is a significant problem in WO, NR, and F-F, and several tools exist at the regional, state, and federal level, very few mitigation measures were observed at the DAC level.

Finally, minimal on-the-ground measures exist to promote local non-auto accessibility, overall neighborhood-level accessibility, and regional transit accessibility. Some notable projects include the Mandela BART mixed-use project in WO, the construction of a few bike lanes in F-F, and the development of transit-oriented housing and transportation corridors in F-F. Apart from these, several plans and policies exist at the city/county, regional, state, and federal levels with unclear impacts at the DAC level.

Surprisingly, the lack of DAC-level interventions is despite the existence of DAC-level tools such as the WOSP in WO, NR QOL Plan in NR, VCSP in Bloomington, and FFTODSP in F-F; and presence

of CBOs such as WOEIP and Mandela Partners in WO, RCF and HCDC in NR, CCAEJ and PC4EJ in Bloomington, and FFCO in F-F. However, apart from a few, many CBOs have limited capacity, and some, such as PC4EJ and CCAEJ, have found city and county governments uncooperative and unresponsive to their views and needs. Nevertheless, the efforts CBOs have taken in WO, NR, and F-F to produce their own DAC-level plans and/or have their concerns and ideas integrated into and influencing the plans of government entities is notable, both in terms of the tenacity and effectiveness of CBOs to advocate for their communities.

8.1.5 Lack of effective regional policies

While all the case study DACs are identified for future growth due to their designation as PDAs/PGAs/SOIs in the regional plans, the regional tools seem to have little impact at the DAC level. Interviewees—both local government and CBO staff—reported being largely unaware of policies, strategies, and action items noted in the regional plans (Plan Bay Area for the S.F. Bay Area region and Connect SoCal 2024 for the SoCal region). Some identified these policies, strategies, and action items as highly aspirational or generic.

8.2 Recommendations

8.2.1 State and federal funds directed to DACs

All the case study DACs exist in fiscally constrained cities such as Oakland and North Richmond, or in counties such as San Bernardino, LA, and Contra Costa. The local governments in these cities and counties need significant financial support to effectively address the substantial disadvantages impacting these communities. For example, lead abatement policies in local general plans mean little without financial assistance for the community to undertake lead abatement projects. Similarly, funds are needed to incentivize grocery stores to locate in DACs and to construct pedestrian and bike facilities. Finally, funds are also needed to monitor the efficacy of plans and projects. While new funding sources are needed, benefits to DACs can be achieved through more targeted and DAC resident-led funding allocations and implementation.

8.2.2 Regulations and incentives for local governments to meet the needs of DACs

The review of F-F and Bloomington case studies suggests that county governments view DACs as locations to meet their county-wide objectives, such as housing (in F-F) and economic development through warehouses (in Bloomington). Often, these objectives don't align with the DAC's needs or, in Bloomington's case, further worsen the environmental disadvantage. Hence, through regulation and incentives, state and regional agencies should require local governments to mitigate the disadvantages of DACs actively. For example, new projects in DACs could be required to undergo a comprehensive impact assessment to demonstrate that they will either not worsen existing disadvantages or reduce them. Notably, CBOs point out that recent state

laws that allow ministerial approvals for transit-oriented affordable housing have adverse effects on DACs because these projects are being developed under the radar in these communities, particularly in DACs like WO which already serve as an asset for their regions with their affordable housing stock.

8.2.3 Fair and effective community benefit agreements with the developers/local employers

While a few instances of a local employer helping the community exist—such as the partnership between Chevron and RCF called Equip Richmond, in which Chevron invested \$10 million in the communities adjacent to its refinery, with no term limit—they appear to be rare. In most cases, such as the warehouses in Bloomington or the affordable housing developments in F-F, the DAC residents gain very little from the new development. In fact, they are left more disadvantaged on some dimensions, such as the environmental dimension in Bloomington and the socio-economic dimension in F-F, where new developments increase pollution and replaced local landmarks, respectively. Therefore, as disadvantaged PDAs/PGAs/SOIs receive new development, local governments should facilitate fair and effective community benefit agreements aligned with the communities' needs.

8.2.4 Require local governments to proactively engage CBOs

Local governments' relationships with local CBOs are mixed. In some cases, such as WO and NR, CBOs and local governments work together on projects. In the case of F-F, the local CBO, FFCO, had to press to get the local government to take note of the community's historical character, which is sometimes under threat from new development; while in Bloomington, the CBOs and the county government do not have a much of a noticeable cooperative relationship. Often, these CBOs know the on-the-ground conditions well and are the primary voices of these low-income, minority, marginalized communities. Therefore, local governments should be required to proactively engage local CBOs in all aspects of planning, implementation, and monitoring.

8.2.5 Comprehensive framework to implement regional tools

Mathur and Ferrell (2024) found that PDAs/PGAs/SOIs are twice as likely as other urban areas to be disadvantaged.⁹⁰³ They also operationalized community-level disadvantage across various dimensions and sub-dimensions and, through GIS maps, showed the location of DACs. The regional agencies should use such data to develop nuanced policy frameworks that require proactive mitigation of disadvantages in DACs, especially those prioritized for future growth. Such

⁹⁰³ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

a framework should serve as the basis for financial assistance, regulations, incentives, and other efforts outlined in our recommendations to mitigate these disadvantages.

8.3 Study Limitations

The study has three major limitations, as detailed below.

8.3.1 Selection bias for case study methods employed

Given the time and resource constraints, the four case study DACs were selected based on three criteria: a) the severity of disadvantages, b) the potential for these communities to take on new development either through greenfield development or redevelopment, and c) their location in the S.F. Bay Area and Southern California regions. To that extent, the case study DACs are not statistically representative of all such communities in these two regions (and certainly across California and the nation), the study findings and recommendations lack generalizability.

8.3.2 Non-representative interviews; stakeholders difficult to reach

The research relied significantly on stakeholder interviews, which were difficult to secure. The school districts' superintendents did not respond to repeated email requests for interviews, and in one case, when one did (asking their assistant superintendent to grant an interview), the interviewee was unable to answer the questions posed because they were in charge of school capital facilities, not educational programs.

Moreover, many CBOs active in the case study DACs are very small, with most having no online presence or readily available contact information. While the study team tracked down and interviewed several such CBOs, many more could have been interviewed if the team had more time, resources, and better information. The same applies to the staff of government agencies. While many were very generous with their time, several did not respond to repeated interview requests. In some cases, because the information on the case study DACs is siloed across several agencies, more agencies' staff could have been interviewed than the time and resources allowed.

Due to all the above-noted reasons, we don't claim easy replicability of our findings. However, this limitation applies to most qualitative research.

8.3.3 Lack of study resources to do more investigations/cases

Lack of time and budgetary resources limited the number of case study DACs included in this study and the depth of investigation.

8.4 Future Research Opportunities

Future research could draw upon this study's major findings/takeaways, recommendations, and limitations in several ways noted below.

8.4.1 California and US-wide identification of DACs

Our study drew upon the work of Mathur and Ferrell (2024) to identify four case study DACs. However, Mathur and Ferrell's study⁹⁰⁴ was limited to the two largest regions of California—the S.F. Bay Area and SoCal. For these two regions, our study validated the metrics developed by Mathur and Ferrell (2024) to identify DACs when we found that the disadvantages on which Mathur and Ferrell (2024) found the case study DACs to be disadvantaged were essentially those on which the local stakeholders (and other data) found them to be, except in a few cases, such as the air and ground pollution, where our study found significant disadvantages but Mathur and Ferrell (2024) did not. Future research could expand Mathur and Ferrell's study to California and U.S.-wide, examining whether the metrics they developed are relevant across California and the U.S., or whether they need to be refined or expanded. Such expansive research would allow ground-truthing through qualitative case studies.

8.4.2 Larger study to examine more DACs

Building upon the above research opportunity, future research could study more DACs representative of those across California and the U.S. Some of these DACs in the S.F. Bay Area include North Texas Street Core in the City of Fairfield, Railroad Avenue eBART Station in the City of Pittsburg, Pittsburg Bay Point Community Connected PDA in unincorporated Contra Costa County, and Eastmont Town Center/International Blvd TOD, Fruitvale and Dimond Areas and Coliseum Bay Area Rapid Transit Station in the City of Oakland. The DACs in SoCal include Boyle Heights, South Los Angeles, and Southeast Los Angeles in the City of Los Angeles.

Such a study will might allow researchers to develop a typology of the barriers faced by DACs and of the recommended interventions. For example, such research might uncover whether DACs in unincorporated areas indeed suffer from greater political and bureaucratic neglect than their city counterparts. It could also help identify models of successful mitigation of disadvantages and uncover state and county-level policies and programs that best empower DAC residents and CBOs to address their own disadvantages. Finally, a larger study could help develop policy strategies and a best-practices manual.

⁹⁰⁴ Mathur and Ferrell, Are California's Local Jurisdictions Disproportionately Directing Growth Toward Existing Disadvantaged Communities?

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Dr. Shishir Mathur is an MTI Research Associate and a Professor of Urban and Regional Planning at San Jose State University. He served as Associate Dean of Research (College of Social Sciences) during 2016-2019 and the Director of the Certificate in Real Estate Development during 2016-2020. His research interests include transportation finance, urban and real estate economics, affordable housing, international development, infrastructure and development finance, and growth management. His research has been published in top-tier journals such as *Transportation Research Part A*, *Transport Policy*, *Journal of Planning Education and Research*, *Urban Studies*, *Land Use Policy*, *Cities*, and *Habitat International*. He is the author of three books: *Development Charges: Funding Urban Infrastructure in India and the Global South* (Cambridge University Press), *Understanding India's New Approach to Spatial Planning and Development: A Salient Shift?* (Oxford University Press) and *Innovation in Public Transport Finance: Property Value Capture* (Routledge). Dr. Mathur has advised several international and national organizations. United Nations Human Settlements Programme (UN-HABITAT) sought his input on ways to encourage land-based financing in Africa, Asia, and South America. He advised Federal Transit Administration on ways to promote land value capture to fund transit-oriented developments and transit infrastructure.

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Dr. Christopher E. Ferrell began his career in 1995 as a planner for the Metropolitan Transportation Commission (MTC). He completed his doctoral studies in City and Regional Planning at the University of California at Berkeley in 2005 and worked as a consultant with Dowling Associates, Inc. for 10 years before leaving to help form CFA Consultants in 2010. He is currently a principal, board member, and the executive director of the Transportation Choices for Sustainable Communities Research and Policy Institute, a 501c3 nonprofit. He has been the principal investigator for several research projects for the Mineta Transportation Institute, where he has been a Research Associate since 2005. His research focuses on the relationships between transportation and land use, livability, travel behavior, transportation policy, and planning-related institutional structures. His research experience includes the study of multimodal transit and freeway corridors, best practices for building successful transit-oriented development, the effects of transit-oriented development on surrounding property values, the effects of neighborhood crimes on transportation mode choice, and a set of methods, metrics and strategies for evaluating transit corridor livability. As a practitioner, he has planned mixed-use, infill and transit-oriented development projects, analyzed the impacts of specific and general plans, planned and implemented intelligent transportation systems, and developed bicycle and

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