

From:
To: [Hector Rojas](#)
Cc: [Monica Brown](#); [James Cassandra](#); [Meg](#); [Misty](#); [Helen-Marie Gordon](#)
Subject: Public Comment: Draft Environmental Justice General Plan Amendments — Sandy Beach Land Trust & Shoreline Resilience
Date: Saturday, March 7, 2026 5:58:20 AM

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Dear Mr. Rojas,

Thank you for the opportunity to comment on the City of Vallejo's Draft Environmental Justice General Plan Amendments (March 2026 Public Review Draft). I write as a State Lands Commission leaseholder at 3 Sandy Beach Road, an unincorporated Solano County community immediately adjacent to Vallejo's southern waterfront.

I strongly support the intent of these amendments and write to offer a proposal that I believe directly advances several of Vallejo's stated Environmental Justice goals — particularly those related to sea level rise adaptation, shoreline resilience, and equitable investment in the communities that bear the greatest environmental burden.

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Sandy Beach Land Trust: A Complementary Mechanism

The CalEnviroScreen data in your draft is striking. Tract 0701 (South Vallejo) — the census tract closest to the Sandy Beach shoreline — scores at the 97.9th percentile statewide, with extreme vulnerability scores for proximity to impaired water bodies, groundwater threats, diesel particulate matter, asthma, cardiovascular disease, and unemployment. The residents of South Vallejo are among the most environmentally burdened in California, and they live immediately adjacent to a shoreline that faces accelerating flood and erosion risk from sea level rise.

At the same time, Sandy Beach currently generates approximately \$100,000 per year in State Lands Commission (SLC) lease revenue — money that flows directly into the California State General Fund, with nothing returned to the local shoreline or the nearby communities who bear the consequences of coastal hazards.

I am proposing the creation of a Sandy Beach Land Trust — a legislatively authorized trust grant that would name Solano County as Trustee and redirect this lease revenue into a restricted local account for shoreline resilience, habitat restoration, public access, and sea level rise adaptation. This is the same statutory architecture used by more than 70% of California's tidelands jurisdictions, including the cities of Long Beach, Oakland, Alameda, Berkeley, and others.

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Alignment with Vallejo's Draft EJ General Plan Policies

This proposal connects directly to several policies and actions in your draft amendments:

- Policy NBE-5.9 / Action NBE-5.9C calls for Vallejo to develop a Sea Level Rise Strategy in consultation with Solano County and BCDC. The Sandy Beach Land Trust would provide Solano County with a stable funding stream to participate meaningfully in exactly this kind of cross-jurisdictional planning.
- Action NBE-5.9B seeks funding for sea level rise adaptation strategies and projects. A Trust-funded local match would make joint Vallejo–Solano County grant applications significantly more competitive for BCDC, OPC, NOAA, and FEMA BRIC funding.
- Action NBE-1.1G requires protecting coastal salt marsh and tidal habitat along the Vallejo shoreline. Nature-based solutions funded by the Trust — living shorelines, marsh migration corridors, tidal wetland enhancement — would advance this objective on the Solano County side of the same shared shoreline system.
- Action CP-4.1D commits Vallejo to partnering with community-based organizations in impacted tracts. Trust-funded community engagement at Sandy Beach would extend this commitment to the adjacent unincorporated community.

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A Request for the Record

I respectfully request that the City of Vallejo's final Environmental Justice General Plan Amendments:

1. Acknowledge the Sandy Beach and adjacent Solano County shoreline as part of the shared vulnerability zone affecting South Vallejo's impacted communities.
2. Reference the Sandy Beach Land Trust proposal as a complementary cross-jurisdictional funding mechanism for sea level rise adaptation and shoreline resilience.
3. Support coordination between Vallejo, Solano County, BCDC, and the Fairfield-Suisun Sewer District under the Solano Bayshore Resiliency Project framework, which encompasses the same hydrodynamic system that includes Sandy Beach.

Redirecting lease revenue generated at Sandy Beach back into the shoreline that generates it is, at its core, an environmental justice intervention — ensuring that the communities most exposed to coastal hazard risk have access to the resources needed to respond.

I would welcome the opportunity to discuss this proposal further with you or with

Planning Commission and City Council staff. I have also submitted this proposal to Solano County Supervisor Monica Brown, Chair of the Board of Supervisors.

Thank you for your consideration.

Warm regards,

Alan Barker

State Lands Commission Leaseholder
J.com

Cc:

Supervisor Monica Brown, Solano County Board of Supervisors

James Cassandra

Meg Herston

Misty Kaltreider

Helen-Marie "Cookie" Gordon

Sent from my iPhone

Alan Barker

July 20, 2026

City of Vallejo Planning Division
555 Santa Clara Street
Vallejo, CA 94590

Delivered via email: hector.rojas@cityofvallejo.net

Re: Comments on the Draft Environmental Justice General Plan Amendments

Dear Hector,

Thank you for the opportunity to comment on the City of Vallejo's Draft Environmental Justice General Plan Amendments.

This letter provides my general comments on the draft amendment text, identification of impacted communities, and draft policies and actions. My detailed comments are provided in Attachment A and are focused on traffic safety and the corresponding policies and actions proposed for Chapter 6.

It is my hope that you receive detailed comments on the other environmental justice issues and draft policies and actions from residents who have lived experience or specialized knowledge of those issues. If not, please consider conducted additional targeted outreach to elicit feedback on those issues to ensure that they do meet the concerns and needs of impacted communities.

Engage Meaningfully with Impacted Communities

I understand that the City has limited staff capacity to conduct outreach and engagement for this plan, and I appreciate that you have taken it upon yourself to show up to workshops hosted by others to hear the concerns and input directly from residents of Vallejo. However, these events do not replace the need to solicit direct input from impacted communities that have been identified as part of the draft amendment.

Residents of impacted communities can best validate whether the draft summary of environmental justice issues adequately captures their concerns. They also have local knowledge to add specificity to the descriptions and may be able to offer ideas for solutions that have not yet been considered.

The California Department of Justice *Best Practices for Implementing SB 1000*¹ and the Office of Land Use and Climate Innovation *General Plan Guidelines, Section 4.8 Environmental Justice Element*² both emphasize the importance of meaningful engagement as pillar of planning for environmental justice.

The draft amendments include proposed policies (CP-4.2) and actions (CP-4.1D, CP-4.1E, CP-4.2E, CP-4.2F) that recognize the need for meaningful engagement. Yet the process to develop the draft amendments has yet to implement these actions. I urge the City to **dedicate the time and resources needed to properly engage with impacted communities and incorporate feedback on the draft amendments prior to adoption.**

Add Regional and Historical Context

The text of the draft amendment, to be incorporated into Chapter 3 of the general plan, does a good job of defining the term environmental justice and SB 1000. The following sections recommend additional content that could be incorporated to provide more context for the draft policies and actions that are proposed.

Regional Context

The distribution of environmental burdens is relative, meaning understanding which areas are more or less burdened necessitates considering the scale of the comparison. Solano County has the lowest median household income of all nine Bay Area counties. Within Solano County, Vallejo has one of the lowest median household incomes among all jurisdictions. Table CP-4 (Additional Impacted Community Demographic Information) alludes to this discrepancy by providing the state and county median household income compared to impacted tracts in Vallejo. However, there is no discussion of the discrepancy within the text. This regional context is important to establish in the EJ GPA if the City seeks to set limits on further siting of nuisance or noxious uses within the City limits.

History

To the extent possible, the EJ GPA text should document historical (and ongoing) causes of environmental injustices in Vallejo. Historical context would help to highlight how environmental justice issues carry forward through generations of people and communities. Story telling around the cause of the environmental injustices would also highlight the nexus with the proposed solutions (policies and actions) as well as the gaps that the City does not have the ability to address on its own.

¹ Accessed at <https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf>

² Accessed at https://lci.ca.gov/wp-content/uploads/20200706-GPG_Chapter_4_EJ.pdf

Some of this content already exists within other general plan elements and could be incorporated by reference. For example, the Housing Element (Appendix 3, Fair Housing Needs Assessment) discusses the history of redlining and mentions specific neighborhoods in Vallejo that were historically redlined. Historically redlined communities generally received less public investment in infrastructure and amenities over many decades, meaning these neighborhoods likely face significant gaps in the provision of public facilities compared to the rest of the City.

Other relevant aspects of Vallejo's history include the growth and closure of the Mare Island Naval Base and shipyard and construction and expansion of I-80 and Highway 37. Engaging with long-time residents of impacted communities would likely turn up additional historical factors that could be acknowledged within this section of the EJ GPA.

Definitions

Thank you for using the term “impacted communities” to identify the census tracts that score in the 75th percentile or above for CalEnviroScreen (CES) scores. This term is preferable to “disadvantaged communities” – the term used in State law and code.

Other terms are used throughout the text of the draft policies and actions that are not defined (e.g. underrepresented communities). Consider providing definitions for these terms so that it is clear if and how these differ from “impacted communities.”

Restructure the Summary of Environmental Justice Issues

The summary of environmental justice issues mixes descriptions of CES indicators (e.g., asthma) alongside issues not covered by CES, like healthy food access and illegal dumping. There are several CES indicators that are bolded in Table CP-3 but not identified in the summary of environmental justice issues (e.g., diesel PM emissions, hazardous waste facilities, impaired water bodies, solid waste sites). This mixing leads to some misleading summaries. For example, the paragraph on “traffic” discusses concerns about traffic safety, but provides the CES indicator score for traffic density.

To better distinguish between CES indicators and other environmental justice issues, consider moving the indicator descriptions to the prior section, to elaborate on the information in Table CP-3. The descriptions should be supplemented so that any indicator with a score in the 75th percentile or higher in an impacted community is described. This reorganization would also allow for proper emphasis to be given to the indicators that are significant across the board, such as recognizing that the asthma indicator is in the 100th percentile for all but one tract.

The summary of environmental justice issues section could then document additional concerns that have been identified through community engagement and/or other data sources. Please consider supplementing the list of issues through targeted outreach to residents of the impacted communities.

Revise Select Issue Summaries

Please consider the following revisions to the summary of environmental justice issues.

Traffic Safety

Thank you for including a discussion of traffic safety among the list of environmental justice issues. Please rename this section “traffic safety” to better identify the concern and distinguish it from traffic density (the volume of traffic). Please update the discussion to remove the CES score, which is unrelated to traffic safety.

Traffic density is closely related to air quality-related health burdens, but is unrelated to traffic safety. Pedestrians are much safer in Hoboken, NJ (just outside of New York City) than in Vallejo, CA despite Hoboken having significantly higher traffic density than Vallejo, CA. This is because Hoboken has sufficient pedestrian infrastructure, 20 mph speed limits, and an [award-winning Vision Zero plan](#) that has resulted in zero pedestrian fatalities over nearly a decade.

In contrast to traffic density, traffic safety (or lack thereof) is better represented by traffic injury and fatality data.³

Unhoused Population & Encampments

The summary discusses this issue from the perspective of housed community members who feel burdened by the presence of encampments, rather than from the perspective of people experiencing homelessness. People experiencing homelessness are members of the community whose perspectives should be represented in the EJ GPA. People experiencing homelessness encounter a litany of injustices based on lack of formal address and stigmatization, including lack of access to clean water, sanitation, healthy food, and safety, as well as challenges accessing public services that require a mailing address or stable phone number. This section should be reframed so that the draft policies and actions that connect to this issue can lead to more sustainable and just solutions.⁴

³ Links to these and other data sources are provided later in this letter.

⁴ Consider adding draft policies and actions to provide for or permit more diverse shelter and housing options, including safe parking lots, SROs and boardinghouses, and emergency shelters.

Identification of Impacted Communities

The draft amendment includes a detailed tabulation of the indicators used to develop pollution burden and population characteristics scores within CES 4.0 and clearly identifies how these were used to identify impacted communities in Vallejo. This analysis should be accompanied by a discussion about the limitations of using CES data to fully understand environmental burdens and should be supplemented with additional topic-specific data sources.

Acknowledge the Limitations of CES

CES scores are calculated as percentiles relative to all of the census tracts in the State. If population characteristics change significantly in a census tract in Los Angeles, it can affect the percentile score of a census tract in Vallejo. In addition, the 75th percentile threshold established by lawmakers to identify “disadvantaged communities” is not necessarily definitive for understanding whether a community is burdened or not; the burdens experienced within a census tract with a CES score in the 74th percentile are not likely that different than a census tract with a CES score in the 76th percentile.

This is not to say that the data is not useful – CES is an excellent starting point for an environmental justice analysis. However, these limitations are important to acknowledge at the very least because, as CES is updated over time, the census tracts that fall into the 75th percentile will change. This is evident already in the beta release of CES 5.0, which identifies a different set of impacted communities in Vallejo compared to CES 4.0.

Incorporate Additional, Topic-Specific Data Sources

The draft amendments identify a range of environmental justice concerns and burdens that are not measured by CES (or any census data for that matter). These include, but are not limited to, healthy food access, traffic safety, and homelessness. Topic-specific indices and datasets that may be useful to better quantify and locate these concerns are discussed below. The City should supplement the analysis in the draft amendments with an analysis of these and other relevant data sources.

Healthy food access

The USDA Food Access Research Atlas provides spatial data for low-income census tracts where:

- A significant number or share of residents is more than ½ mile from the nearest supermarket.
- A significant number or share of residents is more than 1 mile from the nearest supermarket.

- More than 100 housing units do not have a vehicle and are more than ½ mile from the nearest supermarket.

The USDA dataset can be accessed at <https://www.ers.usda.gov/data-products/food-access-research-atlas>. The dataset does not cover the quality or prices of the groceries at these markets but would provide a starting point for understanding the neighborhoods in Vallejo could benefit from regulatory updates to facilitate supermarket development.

Traffic safety

- Chapter 8 in the 2022 Solano Countywide Local Road Safety Plan describes traffic safety issues in Vallejo. Table 52 and Figure 52 identify high crash locations: <https://sta.ca.gov/wp-content/uploads/2022/07/Solano-Countywide-Local-Road-Safety-Plan-1.pdf>
- MTC Vision Zero Dashboard provides a map of Regional High Injury Network roadways: <https://bayviz.mysidewalk.com>
- MTC Vital Signs provides traffic fatality data: <https://vitalsigns.mtc.ca.gov/indicators/fatalities-from-crashes>
- Caltrans District 4 Pedestrian Plan map includes layers for pedestrian fatalities, gaps in sidewalk and crossing infrastructure for State highways (such as Sonoma Boulevard): <https://caltrans.maps.arcgis.com/apps/instant/basic/index.html?appid=47c4c08e68424a68917ba527066047e3&extent=-122.3091,37.4396,-122.1437,37.5337>

Homelessness and Housing Instability

- Solano County Point in Time Counts provide an estimate of the number of sheltered and unsheltered people experiencing homelessness in Vallejo, and demographic characteristics: <https://www.housingfirstsolano.org/wp-content/uploads/2024/10/%E2%80%8B2024-Solano-Point-in-Time-Count-Full-Report-updated-August-29-2024-.pdf>
- Residents of mobile home parks tend to have greater housing instability and risk of displacement because these parks are a legacy housing type that often faces intense regulatory challenges and development pressure. Locations of mobile home parks are available through: <https://mhphoa.com/ca/mhp/statistics>
- UC Berkeley Estimated Displacement Risk Model maps the risk of gentrification and displacement: <https://bids.berkeley.edu/estimated-displacement-risk-model>

The EJ GPA should utilize these readily available datasets to provide more refined descriptions of the burden/risk and to understand if and where it intersects with the impacted communities identified from CES.

General Comments on Draft Environmental Justice Policies and Actions

Identify the Nexus with Environmental Justice Issues

Please provide a crosswalk to illustrate which of the proposed policies and actions are intended to address which of the environmental justice issues described in the text of the draft amendment. Some of the draft policies and actions do not seem related to environmental justice, and a crosswalk would aid in understanding the issues and impacted communities it is intended to cover.

Conversely, some of the environmental justice issues summarized in the draft amendment text do not seem to have corresponding policies or actions. The fact that Chapters 4 and 5 had only one new environmental justice action each seems to indicate an imbalance in the types of environmental justice issues addressed. Chapter 4 seems particularly deserving of more attention, given it covers topics such as urban forest, solid waste reduction, public service provision, noise impacts, etc. A crosswalk would help clarify.

Review and Revise Existing Policies and Actions to Support EJ

In general, I appreciate that many of the proposed policies and actions encourage prioritization of impacted communities for outreach and engagement, projects, funding, etc. However, it does not appear that existing policies and actions were reviewed for potential conflicts with the new policies and actions. Where existing policies and actions state that other criteria should be used to prioritize (e.g., repaving streets based on pavement condition index), how will the City reconcile the conflict? Please consider reviewing and revising existing policies and actions to better align.

Please also review existing policies and actions for recommendations that would provide valuable information to improve the EJ GPA. For example, existing Action CP-1.1A recommends:

Work with Solano Public Health, universities, and other partners to identify areas of Vallejo that lack affordable healthy food retail options, using retail food indices and the United States Department of Agriculture (USDA) "food desert" designation, and including maps that illustrate factors such as concentration of fast food restaurants and convenience food outlets, areas that lack affordable healthy food, areas with limited transportation options, and areas of poverty.

Rather than amending this action, the EJ GPA is the perfect opportunity to *implement* this action. The map could then inform more specific policies and actions to improve food access in these areas, rather than waiting on more intermediate steps.

Be Geographically Specific

A further improvement would be to link environmental justice policies and actions with the specific locations that are burdened by the issue(s) covered by that policy/action. The draft policies and actions do not appear to be tailored to the unique burdens and needs within each community – instead applying to all impacted communities generally.

Focus on What is Achievable

Many of the draft actions use language such as “consider” or “collaborate with” which makes it easy to avoid responsibility to accomplish the action. Actions would be more meaningful if they documented the direction that the City intends to take (rather than to “consider”) and if they focused on actions that the City has the most control over, e.g.,

- Land use decisions (informed by the land use map, development standards, subdivision standards, CEQA thresholds and AMMs, etc.)
- Enforcement of local codes and ordinances
- Public investments (including through the CIP)
- Advocacy on the decisions, enforcement actions, and investments made by regional and State agencies (e.g., BAAQMD, Caltrans)

Each action should be singular and specific enough that the responsible City department or official will understand what is required to accomplish it.

Detailed Comments on Draft Environmental Justice Policies and Actions

Chapter 5 - Economy, Education, and Training

Action EET-2.2C. The draft amendment proposed the following revision to this existing action:

Appeal to businesses that engage high- and semi-skilled labor, including satellite functions of existing companies, such as call centers, customer service centers, data centers, logistics and warehousing, as well as other innovation businesses such as green technology, value manufacturing, research and development, and office uses.

I am not aware of any data to indicate that data centers or warehousing provides a significant number of jobs, let-alone living wage jobs. These uses occupy extremely large footprints and are highly resource intensive, placing significant demand on public infrastructure and creating negative externalities for adjacent communities. I fail to see a nexus between this revision and the environmental justice issues summarized in the draft amendment text. I strongly urge the removal of this revision from the EJ GPA.

Chapter 6 - Mobility, Transportation and Connectivity

Many of the draft policies and actions proposed in this chapter are already done/completed, as documented in the following transportation plans:

- [2025 Solano County Safe Routes to Schools Plan](#)
- [2022 Solano Countywide Local Road Safety Plan](#)
- [2020 Solano County Active Transportation Plan](#)
- [2020 Vallejo Community Based Transportation Plan](#)

Please see **Attachment A** for detailed comments on individual MTC policies and actions.

Conclusion

I am very pleased to see the City make progress towards SB 1000 compliance considering environmental justice in the general plan.

I believe the draft amendments are a great first step for eliciting general feedback from the public. In addition to this public comment opportunity, I strongly encourage the City to solicit targeted input from residents of impacted communities on the range of environmental justice issues considered and the proposed policies and actions.

I would be happy to discuss my comments and recommendations at your convenience.

Thank you for your consideration.

Avery Livengood

Number	Text	EJ Action?	Comments	Recommended Language
Policy MTC-1.1	Regional Transit Connections. Enhance regional transit service for residents, employees, and visitors.			
Action MTC-1.1B	Collaborate with transit agencies to study the feasibility of regional bus rapid transit.		Bus rapid transit on Sonoma Boulevard would be a major improvement for people who rely on the Soltrans R route and local 1 and 7 routes. Currently, traffic and signal timing on Sonoma Boulevard makes this one of the slowest segments of these bus routes. Sonoma Boulevard has ample width for a dedicated bus lane on each side. Recent BRT on Van Ness in San Francisco is a prime example of effective BRT. I do not recommend revisions to the existing action, but I would recommend it as an action that supports EJ.	
Policy MTC-1.4	Regional Transportation Planning. Ensure that Vallejo is well connected to road, rail, air, and maritime systems in support of both mobility and local economic development.			
Action MTC-1.4D	Periodically review designated truck routes and enforce compliance to optimize goods movement and minimize impacts on neighborhoods and sensitive land uses.		This action is closely related to several of the CES indicators that burden Vallejo's impacted communities, including traffic density, deisel PM emissions, and health-related indicators. If truck routes need to be reviewed, it should be done as part of the EJ GPA and not deferred to an unspecified future time. In addition, the lack of enforcement of existing vehicle code (Chapter 8.24) is problematic. Many impacted communities have trucks driving through and parking overnight on their neighborhood streets. In addition to the pollution, noise, and traffic safety burden this poses, it is also contributing to the failing condition of pavement in these neighborhoods. The frequent heavy truck traffic on the Mare Island Bridge (rather than the designated route using Highway 37) likely contributed to its deteroirated condition and the costly fixes that taxpayers are now paying for. I recommend revising this action into separate, more specific actions to improve accountability. See recommended language to the right.	<u>Vallejo Public Works shall install signage demarcating designated truck routes, and shall also install signage on arterials in impacted communities stating "No Trucks Allowed."</u> <u>Vallejo Police Department Traffic Division shall conduct focused enforcement of Municipal Code Chapter 8.24 in impacted communities</u> <u>Vallejo Planning Department shall request Caltrans to study options for designated truck rest areas or overnight parking areas along EB I-80 or WB 37 outside of Vallejo City limits and provide direcitonal signage to support driver wayfinding.</u>
Policy MTC-1.5	Regional Trail Network. Continue to participate in efforts to complete the regional trail network through Vallejo.			
Action MTC-1.5A	Seek funding to complete the San Francisco Bay Trail through Vallejo from the Zampa Bridge in the south, along the waterfront or as close to waterfront as feasible, to the Napa Valley Vine Trail in the north, and the San Francisco Bay and Ridge Trail to the east of I-80 in the Glen Cove area.		Suggest revising this action to include the Vallejo-Swett Ranch segment of the Bay Ridge Trail to the east of I-80. This action would support EJ by providing a pedestrian connection to the Hiddenbrooke neighborhood for residents of other neighborhoods in Vallejo. Currently, Hiddenbrooke is only accessible by private vehicle as there are no bus routes or pedestrian connections.	
Policy MTC-2.1	Safety First. Prioritize pedestrian, bicycle, and automobile safety over traffic flow.			

Action MTC-2.1A	Prepare a citywide Bicycle and Pedestrian Master Plan that builds on the 1998 Plan, identifies improvements needed to close gaps in the network and work toward a “Vision Zero” target for eliminating traffic fatalities and reducing non-fatal collisions.		This action should be revised to implement the recommended projects in the following existing transportation plans: - 2025 Solano County Safe Routes to Schools Plan, Vallejo chapter - 2022 Solano Countywide Local Road Safety Plan, Vallejo chapter - 2020 Solano County Active Transportation Plan, Vallejo chapter - 2020 Vallejo Community Based Transportation Plan These projects should receive priority for available transportation funding, as they are based on data-driven and participatory planning processes, and they are customized to the specific safety needs of each location. See recommended language to the right.	<u>The 1998 Vallejo Bicycle and Pedestrian Master Plan is hereby superceded by the following transportation plans:</u> <u>- 2025 Solano County Safe Routes to Schools Plan, Vallejo chapter</u> <u>- 2022 Solano Countywide Local Road Safety Plan, Vallejo chapter</u> <u>- 2020 Solano County Active Transportation Plan, Vallejo chapter</u> <u>- 2020 Vallejo Community Based Transportation Plan</u> <u>Vallejo Public Works shall add all recommended projects from these plans to the CIP, and program them as funding becomes available.</u> <u>Vallejo Planning Department shall review proposed development plans situated along the pedestrian and bicycle backbone networks for consistency with the improvements identified in these plans.</u>
Action MTC-2.1B	Prioritize completion of sidewalk and bicycle projects listed in the Bicycle and Pedestrian Master Plan as City resources allow.		See comment above.	
<u>Action MTC-2.1D</u>	<u>Consider conducting a study to evaluate the potential of lowering speed limits to 20 miles per hour on streets near schools, parks, and public gathering places, with the goal of identifying measures that improve safety for all roadway users, particularly children, seniors, and bicyclists.</u>	Y	At a September 2025 meeting of the Vallejo City Council, staff presented an opportunity to lower speed limits as part of the City's ongoing engineering and traffic study update (set to expire in May 31, 2026). Councilmembers took action and voted to direct staff to prepare the study to lower speed limits in all school zones and in designated business districts as permitted under AB43. Therefore, there is no need to "consider" lowering speed limits as the Council has already considered and directed staff to do so. The action should be revised accordingly. See recommended language to the right.	<u>Vallejo Public Works shall complete the ET&S necessary to reduce existing speed limits to 20 mph in all school zones citywide and in designated business districts, in accordance with AB43. Adjacent to these 20 mph zones, speed limits should not increase by more than 10 mph within one quarter mile of the 20 mph zone. Where speed limits are reduced, Public Works shall install new speed limit signs to increase diver awareness of the change.</u>
Policy MTC-2.3	Emergency Response Routes. Ensure adequate emergency vehicle access in all areas of Vallejo.			
Action MTC-2.3B	Continue to involve the Police and Fire Departments in the development review process to ensure that applicable requirements for emergency access are met.		Fire department requirements for emergency access are often at odds with pedestrian scale street dimensions and traffic calming/safety features (such as diversions, barriers, speed tables, etc.). Suggest revising this action to better identify ways to accommodate public safety from both an emergency response perspective and a proactive, safe street design perspective.	
Policy MTC-2.4	Citywide Mobility. Maintain a transportation network that provides mobility for all ages and abilities and for all areas of the community.			

Action MTC-2.4C Develop an ADA transition plan to address and outline the steps necessary to enhance accessibility for people with disabilities.

As it relates to transportation and circulation, major accessibility issues include: Vallejo Code Enforcement should issue warnings to cars parked illegally on top of sidewalks, in crosswalks, and within designated bus stops. Repeat offenders should be ticketed or towed, to allow safe passage of pedestrians (including people with disabilities).

- sidewalk gaps (i.e., no existing sidewalk)
- lack of ramps
- cars parked on top of sidewalks, in bus stops, or blocking crosswalks
- construction in the right of way that fails to provide a safe, accessible pedestrian detour of a reasonable distance for someone walking or rolling

Vallejo Public Works should replace non-compliant ADA ramps with compliant ramps, including relocation of existing sidewalk encroachments to meet ADA standards.

Other constraints include a lack of audio signals at crossings, and generally poor quality of existing sidewalks, ramps, and crosswalks.

Instead of addressing these major obstacles, my observation is that the City has chosen a risk management approach of (1) sidewalk grinding (removing lips/cracks in existing sidewalks) and (2) removing non-compliant infrastructure. Vallejo Public Works should prioritize building new sidewalks in locations where there are sidewalk gaps near major transit centers, transit stops, schools, and medical offices. Sidewalk gaps are identified in the Vallejo chapter of the Solano County Active Transportation Plan.

The recent removal of crosswalks on Tennessee Street is a good example of the City choosing to reduce its liability by removing access rather than spending the necessary funds to move a fire hydrant and make an accessible wheelchair ramp. This is **not** an acceptable approach to ADA compliance.

I strongly recommend that the City engage with the STA Paratransit Committee for additional input directly from people with disabilities who use the transportation network in and around Vallejo. This first-hand feedback is critical to informing people-first priorities (over a liability-first approach).

Vallejo Public Works should update standards for construction projects in the right of way to prepare a traffic management plan that accounts for pedestrian (and ADA) detours. Vallejo Public Works should review traffic management plans on-site prior to issuing permits. Vallejo Public Works should inspect detour signage and traffic management systems after installation to confirm that it is consistent with the approved plan. City construction projects should adhere to equivalent standards.

I recommend revising this action into four separate, much more specific actions that reflect the actual steps necessary to enhance accessibility. See recommended language to the right.

Action MTC-2.4D Require all CIP projects and new development to incorporate multimodal access improvements that enhance safe and convenient access for pedestrians, bicyclists, and transit users to key community destinations, including community facilities, schools, parks, shoreline areas, historic sites, commercial areas, and transit hubs, consistent with the City’s General Plan and adopted active transportation plans.

I support this statement in principle. However, this seems more like a goal than an action that the City could take. What would a requirement like this look like, in practice? And how does this relate to EJ?

Suggest breaking this down into more specific actions that would improve accessibility for pedestrians and bicycles. Examples could include:

- Update the City development code to require that all new subdivisions provide pedestrian/bike access points between interior roadways and roadways exterior to the development at the end of every caul-de-sac, within 500 feet of transit stops, and at least every 1/4 mile.
- Update the City development code to require infill development on major corridors (e.g., Sonoma Blvd, Broadway, Solano Ave) to reduce existing driveway widths (and/or consolidate driveways into fewer openings)
- Require all City-funded repaving projects to (1) incorporate curb painting of the 20-ft daylighting zone at intersections, and (2) reduce the number and/or width of drive lanes by striping buffer areas and/or bike lanes wherever roadway widths permit.

Y

Suggest also reviewing the 2020 Vallejo Community-Based Transportation Plan, the 2022 Solano County Active Transportation Plan for the list of projects that have already been recommended in Vallejo. These should be added to the CIP and scheduled to align with funding availability.

Action MTC-2.4E Continue to regularly review and update the transportation impact fees in the City’s master fee schedule to ensure they meet the increasing demand for circulation improvements, including enhancements to pedestrian, bicycle, and public transit facilities and amenities.

Y

Action MTC-2.4F Promote walking and bicycling as daily physical activities by ensuring that daily goods, services, and community recreational facilities and programs are conveniently located within a comfortable walking or biking distance from residences.

This seems more like a goal than an action that the City could take. What would ensuring these outcomes look like, in practice? And how does this relate to EJ?

Suggest considering a review of the land use map to ensure that the mix of allowable uses within walking distance of existing residential districts in impacted communities can support achieving the stated goal.

Y

<u>Policy MTC-2.5</u>	<u>Prioritize Mobility and Connectivity Improvements within Impacted Community Tracts. Prioritize the maintenance of streets and improvement of sidewalks, parks, and other infrastructure in the city's impacted community tracts. Implement complete streets improvements where necessary, especially in conjunction with existing infrastructure maintenance and improvement projects.</u>	Y	While I support prioritizing impacted communities for public investments in principle, it should be noted that the CES indicators only include traffic density as a relevant mobility-related metric and not traffic safety or infrastructure availability. Other planning efforts have taken a closer look at the traffic safety data and reviewed available complete streets infrastructure to identify a more refined set of pedestrian, bicycle, and transit needs. Suggest reconsidering this policy language to align with the safety priority locations identified through past planning efforts, including in: - 2025 Solano County Safe Routes to Schools Plan, Vallejo chapter - 2022 Solano Countywide Local Road Safety Plan, Vallejo chapter - 2020 Solano County Active Transportation Plan, Vallejo chapter - 2020 Vallejo Community Based Transportation Plan
<u>Action MTC-2.5A</u>	<u>Identify and eliminate barriers to outdoor physical activity in impacted community tracts. These barriers include damaged or incomplete sidewalks and bike paths, blocked or littered pathways, unsafe street crossings, insufficient lighting, high crime rates or perceptions of crime, and inadequate landscaping and shade trees along streets.</u>	Y	A list of sidewalk gaps and unsafe crossings is available in the 2020 Solano County Active Transportation Plan. Suggest revising the action to include greater specificity.
<u>Action MTC-2.5B</u>	<u>When planning parks and infrastructure maintenance and improvement projects, engage in an open process that includes community residents. Key considerations should include determining if the project area is within an impacted community tract, assessing the community's needs and whether the project addresses them, and evaluating potential negative impacts, such as increased exposure to pollutants or displacement of residents and local businesses.</u>	Y	
<u>Action MTC-2.5C</u>	<u>Collaborate with transit agencies, nonprofit organizations, and local communities to enhance transit services within impacted community tracts, connecting residents with employment, shopping, and services.</u>	Y	Is this new action realistically achievable considering that Soltrans just approved its systemwide redesign, to take effect this summer? Suggest working with Soltrans to identify gaps they were unable to fill or public comments they were unable to address through the system redesign that could potentially be met by other service providers.
<u>Policy MTC-2.7</u>	<u>MTC-2.7 Pavement Condition. Improve street pavement condition in Vallejo, prioritizing neighborhood corridors and arterials.</u>		
<u>Action MTC-2.7A</u>	<u>MTC-2.7A Target neighborhood corridors, commercial corridors, and arterial segments that have a pavement condition index (PCI) of 50 or less and enhance economic development opportunities as top priorities and seek funding for improvements.</u>		Multiple new policies indicate that investments should be prioritized in impacted communities. Perhaps given the pervasivness of streets with PCI < 50, an additional criterion could be added to further prioritize based on location within impacted communities.
<u>Policy MTC-2.8</u>	<u>MTC-2.8 Complete Streets. Increase accessibility for and use of streets by pedestrians, bicyclists, and transit riders.</u>		

<u>Action MTC-2.8G</u>	<u>Update the City’s street design standards consistent with Complete Streets principles to ensure people taking public transit, bicycling, and walking are safely accommodated on all streets.</u>	Y	To be effective, street design standards need to be very specific to individual corridors and districts and not broadly applied to "all streets". It would not be appropriate to require complete streets amenities on a designated truck route on Mare Island, for example, because it could lead to increases in conflicts/collisions. Street typologies, number of lanes, speed limits, driveways, etc. all inform appropriate design. This seems to be captured somewhat by existing policy MTC-2.6 and actions MTC-2.8A and 2.8D and so I would reconsider the need for this action. If retained, I recommend the City contact peer jurisdictions with robust active transportation networks (e.g., Davis, Sacramento) to request examples of street design standards to draw model language from.
Policy MTC-2.10	MTC-2.10 Local Transit. Encourage increased local transit ridership to work, school, shopping, and recreation.		
Action MTC-2.10A	MTC-2.10A Coordinate with transit providers to facilitate local service that is timely, cost-effective, and responsive to community travel patterns and needs, including to hospitals and sources of healthy food.		Is this action complete considering that Soltrans just approved its systemwide redesign, to take effect this summer? See also my comments on Action MTC-2.5C above.
Policy MTC-2.14	MTC-2.14 Alternative Fuel Vehicles. Utilize alternative fuel vehicles as much as feasible.		
Action MTC-2.14B	MTC-2.14B Work with public transportation agencies, such as the Solano Transportation Authority and Soltrans, to develop a strategy to implement a network of public and private alternative fueling stations, such as electric vehicle charging stations and stations providing compressed natural gas (CNG).		This action should be marked as an EJ action, since traditional buses contribute to deisel PM emissions and the health indicators that are burdening Vallejo's impacted communities. Transitioning buses to clean fuels will help reduce these burdens, while continuing to provide access to transit.
<u>Action MTC-3.1E</u>	<u>Continue evaluating potential air quality, noise, safety, and accessibility impacts on sensitive receptors (such as schools, senior centers, parks, and residential areas) when planning and designing new roadway improvements.</u>	Y	I support this action, but would suggest reframing to "Improve City processes to evaluate... impacts..." and add language regarding how the City will enforce AMMs on projects that are not led by the City (e.g., those implemented by developers or by Caltrans). There is significant room for improvement. I have documented multiple instances in which City sidewalk projects resulted in a lack of ADA accessible crossings or routes with no detour provided. There were also two instances this past spring when the Caltrans SR-29 pavement rehabilitation project contractor was jackhammering adjacent to Lincoln Elementary School during school hours. Improving these processes could involve changes to the City's AMMs, changes to inspections/enforcement procesess, or staff training. See recommended language to the right, which is also repeated from above.
<u>Policy MTC-3.12</u>	<u>Equitable Distribution. Ensure that public facilities are both adequate and equitably distributed throughout the community.</u>	Y	The actions within this section seem similar to Policy MTC-3.11 - is a separate policy needed?

Action MTC-3.12A Address the future public improvement and service needs of underserved communities.

Y

Specify how this action (to address the needs of underserved communities) differs from Action MTC-3.12B (to address the needs of impacted communities). How is the EJ GPA defining underserved communities? If there is no distinct definition, I recommend consolidating into a single action with MTC-3.12B.

Action MTC-3.12B Prioritize CIP projects to address the needs of impacted community tracts, based on the feedback and concerns expressed by the residents of those areas.

Y

The City Planning Department should (1) engage with residents of the impacted tracts to identify their concerns and needs, and incorporate the specific concepts into the EJ GPA, and/or (2) review the transportation concerns, needs, and recommendations that have already been identified through past participatory planning efforts to incorporate those concerns, needs, and recommendations in the EJ GPA. A prime example is the 2020 Vallejo Community-Based Transportation Plan.

From: [Dwayne Pauletich](#)
To: [Hector Rojas](#)
Cc: [Kristin Pollot](#); [Bill Collins](#); [Bell, Jeffrey](#); [City Atty](#)
Subject: FORMAL OBJECTION: Draft Environmental Justice General Plan Amendments (Inconsistency with Existing Infrastructure Failures at Reo Alley)
Date: Sunday, March 29, 2026 4:02:58 PM
Attachments: [IMG_3434.jpg](#)
[IMG_3430.jpg](#)
[To_hector - COV PLANNING.pdf](#)
[VFWD GIS MAP.pdf](#)
[OneDrive_2_1-14-2026.zip](#)
[OneDrive_1_1-14-2026.zip](#)
[OneDrive_2026-01-14.zip](#)
[12.22.2025-Trevor_HansonBridgett_No_defects.pdf](#)

This Message Is From an External Sender

This message came from outside your organization.

Dear Mr. Rojas and the Vallejo Planning Division,

Please accept this formal public comment regarding the Draft Environmental Justice (EJ) General Plan Amendments (March 6, 2026).

As a California Licensed General Contractor (#670938) and a resident directly impacted by infrastructure failure, I am writing to state that the current Draft is **factually inconsistent and inadequate** under SB 1000. The City cannot move to codify "Environmental Justice" policies while senior officials (Planning, Building, and Health) simultaneously ignore documented evidence of a surcharging, high-virus-load sewer main in a residential alley.

Attachments:

- Formal Complaint
- VFWD CCTV Video
- VFWD Asset Report(s)
- VFWD Work Order(s)
- HandsonBridgett Letter claiming (No Defects)
- VFWD GIS Map Demonstrating asset locations.

Sincerely

Dwayne M Pauletich



2023-08-29 - CCTV Inspection#64191_TVIN 102...

From: [Dwayne Pauletich](#)
To: [Hector Rojas](#); citycouncil@cityofvallejo.net; [Kristin Pollot](#); [City Atty](#)
Subject: PUBLIC COMMENT: Protest of Draft Environmental Justice General Plan Amendments – Inadequate Baseline Protections
Date: Sunday, July 19, 2026 2:41:40 PM

This Message Is From an External Sender

This message came from outside your organization.

Dear Planning Manager Rojas and Vallejo Planning Division,

Please accept this formal public comment and protest regarding the Draft Environmental Justice (EJ) General Plan Amendments (SB 1000). While the city intends to integrate environmental justice policies to reduce exposure to environmental burdens and improve public health outcomes in disadvantaged census tracts, the Planning Division cannot legitimately implement or validate this framework while ignoring active, severe municipal health disparities that violate state law.

Case in Point: Reo Alley and Monterey Street At the west end of Reo Alley at Monterey Street, an unshielded, below-grade 24-inch stormwater inlet serves an entire municipal block and a 25,000 sq. ft. commercial parking lot. Because this unimproved area is an unmanaged encampment, the drain is routinely buried in municipal trash and human waste. Without structural source control, pathogens, bacteria, and solid toxics wash directly into the community's water infrastructure. Basis of the

Protest: The City of Vallejo and its Wastewater District are currently under an active state-issued Cease and Desist Order (Order R2-2025-0034) for failing to protect these communities from stormwater trash pollution.

The planning department's Environmental Justice program is fundamentally flawed if it outlines future equitable health metrics while actively allowing minority and low-income census tracts to absorb illicit bacterial and environmental discharges due to neglected physical infrastructure.

Environmental justice is not a theoretical planning document; it requires correcting disproportionate environmental burdens on the ground. Demanded Remedy Prior to EJ Implementation: I request that the Planning Division put a formal hold on final adoption of these amendments—or explicitly insert a binding capital improvement mandate—requiring that all at-grade or below-grade storm water inlets in designated disadvantaged census tracts be physically retrofitted with Full Trash Capture (FTC) systems and concrete curbing to protect neighborhoods from bio-waste and runoff.

This structural environmental racism must be addressed prior to finalizing the EJ program. Please include this protest and specific infrastructure failure in the official public record for the SB 1000 General Plan Amendments.

EXECUTIVE MEMORANDUM

Supplemental Implementation Recommendations for the Draft Environmental Justice General Plan Amendments

Housing stability, homelessness response, senior and tenant protection, workforce opportunity, and accountable implementation

TO Hector Rojas, Long-Range Planning Manager, City of Vallejo
FROM Melvin Cowan, MPA, Principal, Enough Housing
DATE July 23, 2026
SUBJECT Supplemental Implementation Recommendations for the Draft Environmental Justice General Plan Amendments
RE Housing stability, homelessness response, senior and tenant protection, workforce opportunity, and accountable implementation
ATTACHMENT Attachment A - White Slough/SR 37: Priority Environmental Justice Implementation Opportunity

Purpose

Enough Housing respectfully submits these supplemental implementation recommendations for consideration as the City finalizes the Draft Environmental Justice General Plan Amendments. The recommendations are grounded in active implementation work involving White Slough and North Vallejo, the pending Encampment Resolution Fund application led by CAP Solano JPA, supportive and special-needs housing, senior housing stability, and Vallejo's tenant-protection planning process.

The White Slough ERF application remains pending and is not presented as an awarded or operational program. It is included as evidence of emerging regional alignment, implementation planning, and a potential funding pathway that can inform the City's Environmental Justice work regardless of the award outcome.

The draft provides a substantial policy foundation. It identifies ten impacted census tracts, documents serious environmental and socioeconomic burdens, and recognizes housing burden, unsafe housing, homelessness, encampments, public accountability, and unequal access to resources as environmental-justice concerns. The central opportunity now is to translate those findings into a more measurable, housing-centered, community-accountable implementation framework.

EXECUTIVE ASSESSMENT The draft is strongest in identifying environmental burdens and weakest in defining who is responsible, how implementation will be funded, how vulnerable residents will be protected from displacement, and how progress will be measured.

Priority Recommendations

- **Housing-led environmental justice:** Recognize unsheltered homelessness as direct environmental-health exposure and add a housing-led encampment-resolution action centered on voluntary outreach, sanitation, interim and permanent housing, health services, and prevention of displacement into other hazardous locations.
- **White Slough implementation opportunity:** Establish White Slough/SR 37 as a priority place-based Environmental Justice implementation area integrating housing stabilization, environmental health, flood and drainage coordination, sanitation, infrastructure and emergency access, workforce development, community stewardship, lived experience, and long-term site transition. A regional ERF application has been submitted but remains pending; the associated planning and partnership framework can nevertheless inform City implementation.
- **Senior and tenant protection infrastructure:** Add a Housing Stability and Tenant Protection policy supported by designated staffing, centralized intake, rental-property data, proactive habitability oversight, eviction prevention, legal navigation, affordable-rental preservation, and annual public reporting.

Priority Recommendations (continued)

- **Aging in place and senior housing stability:** Prioritize accessibility modifications, cooling and ventilation, mold and lead remediation, fall prevention, energy efficiency, reasonable accommodations, and protections against displacement following publicly supported improvements.
- **No-displacement safeguards:** Require environmental cleanup, code enforcement, redevelopment, and public-space recovery activities to include housing-stability planning so residents are not displaced from one unsafe condition into another.
- **Lived-experience and community implementation:** Compensate sustained lived-experience participation and authorize funded partnerships with tenant, senior, fair-housing, environmental, and community-based organizations.
- **Accountability and measurable delivery:** Require an Environmental Justice Implementation Plan identifying responsible departments, partner agencies, timelines, funding sources, priority geographies, performance measures, and annual status.
- **Workforce and economic mobility:** Create paid pathways for impacted-community residents in environmental remediation, habitat restoration, housing rehabilitation, construction, energy efficiency, building operations, peer outreach, and stewardship.

Why These Additions Matter

The City has already identified North Vallejo, including tracts surrounding the Highway 37, Interstate 80, and Highway 29 corridors, as impacted communities facing substantial health and socioeconomic burdens. The draft also recognizes unhoused populations and encampments as a citywide environmental-justice concern. However, the current language does not yet fully recognize unhoused people as residents directly exposed to environmental hazards, nor does it establish a clear housing-led response.

Similarly, the draft contains strong elements related to safe and sanitary homes, rehabilitation, code enforcement, multilingual access, and senior services, but it does not yet create the administrative infrastructure needed to make tenant protections operational. Experience from the **Enough Housing-hosted Vallejo Tenant Protection and Enforcement Working Group discussions** demonstrates that adopted protections require staffing, intake, reliable data, enforceable procedures, trusted outreach, dispute resolution, and measurable outcomes.

Requested Action

- Accept these recommendations into the administrative record as a late public comment and supplemental implementation submission.
- Incorporate the recommendations where feasible into the revised draft, implementation program, or staff recommendations.
- Identify which recommendations are accepted, modified, deferred, or not incorporated.
- Include the submission in materials provided to the Planning Commission and City Council.
- Engage Enough Housing, tenant and senior advocates, community-based partners, and people with lived experience in subsequent implementation discussions.
- Consider White Slough/SR 37 as an early place-based implementation opportunity, while distinguishing long-term City policy commitments from the outcome of any single pending grant application.

Administrative Note

The City's project webpage identifies a public review period of March 6 through July 20, 2026, while the first page of the uploaded draft identifies March 6 through April 20, 2026. The final record should reconcile this discrepancy. The City should also confirm whether the most current available CalEnviroScreen dataset will be used before adoption and complete a final review of table entries, numbering, and formatting.

Source Basis

This memorandum and Attachment A are based principally on the City of Vallejo's March 6, 2026 Draft Environmental Justice General Plan Amendments, the City's Environmental Justice General Plan Amendments project webpage, and Enough Housing's current White Slough implementation planning and regional partnership documentation.

White Slough/SR 37

A Priority Environmental Justice Implementation Opportunity

Housing stability | environmental health | infrastructure | workforce | regional coordination

KEY MESSAGE White Slough should be recognized as a priority place-based Environmental Justice implementation area. A regional ERF application has been submitted, but no award has been made. The application and partnership work nevertheless provide a credible planning framework that the City can use now.

Why White Slough belongs in the EJ framework

White Slough reflects overlapping conditions that cannot be addressed through cleanup or homelessness services alone:

- Unsheltered homelessness and housing instability
- Public-health and behavioral-health vulnerability
- Flooding, drainage, wetland, and shoreline exposure
- Emergency-access and infrastructure constraints
- Transportation-corridor and property-ownership complexity
- Environmental stewardship and long-term site-transition needs

Accurate status

CAP Solano JPA submitted a four-year, housing-centered ERF application for White Slough/SR 37. Funding remains pending. The initiative should therefore be described as an emerging regional implementation framework and potential funding pathway - not as an awarded or operational program.

Evidence of regional readiness

The proposal has documented support or coordination from:

- City of Vallejo
- Solano County Health and Social Services
- State and county elected leadership
- Solano EDC
- Vallejo Flood and Wastewater District
- Workforce and community partners
- Solano Community Foundation

Recommended policy language

Establish White Slough/SR 37 as a priority Environmental Justice implementation area where the City coordinates housing stabilization, public health, flood and drainage considerations, environmental stewardship, emergency access, infrastructure planning, workforce development, and long-term site transition.

Recommended implementation actions

- Designate responsible City departments and a lead coordinator.
- Align the EJ amendments with the Housing Element and the developing homelessness strategy.
- Coordinate with CAP Solano JPA and regional partners without prejudging an ERF award or future procurement.
- Create a funding matrix spanning public grants, utilities, philanthropy, workforce systems, and technical-assistance resources.
- Compensate sustained lived-experience participation and support community-partner administrative capacity.
- Track timelines, funding status, responsible entities, and measurable outcomes through public reporting.

Why this matters now

The City does not need to wait for an ERF award to recognize the policy significance of White Slough. The submitted application, partner commitments, and site-specific analysis can inform planning, departmental coordination, and future funding readiness while preserving clear boundaries around award status, contracting, land use, and implementation authority.

REQUEST TO THE CITY: Incorporate White Slough as a priority EJ implementation area in the final amendments, implementation program, or related departmental work plan, while clearly identifying the ERF application as pending.



Memorandum

To: Hector Rojas (City of Vallejo Planning Dept.)
From: Lorene Allio PhD, for Liat Meitzenheimer, Paula Bauer, and Don Osborne on behalf of Fresh Air Vallejo
Date: March 26, 2026
Subject: Summary of Anticipated FAV Comment Letter Content for EJ Element

Dear Hector,

Thank you again for the thoughtful conversation regarding the draft Environmental Justice (EJ) Element and next steps. Fresh Air Vallejo (FAV) appreciates your openness to feedback and your willingness to consider adjustments to both process and content.

As requested, below is a summary of what Fresh Air Vallejo anticipates including in a formal comment letter to support your discussion with the planning team:

1. Community Engagement

We will highlight that the level and type of community engagement conducted to date does not meet the intent or requirements of SB 1000. Specifically, engagement has not sufficiently centered residents of disadvantaged communities most impacted by environmental burdens. We will recommend a more robust, targeted, and ongoing engagement process, including outreach and interactive formats such as workshops or charrettes. We will recommend extending the public comment period approximately three months beyond April 20 (to July 20 or beyond) to allow for this type of meaningful community engagement.

2. Overall Assessment of the Draft

Our comments will note that the current draft appears to focus primarily on adapting existing General Plan language rather than presenting a transformative, community-driven EJ vision. We will recommend strengthening the document to better reflect the lived experiences, priorities, and specific, targeted solutions identified by EJ communities.

3. Process Recommendations

We will recommend a shift in sequencing so that community input meaningfully informs the next iteration of the draft. This includes conducting engagement prior to finalizing policies and ensuring that community voices shape both priorities and strategies.

4. Policy and Implementation Strengthening

We anticipate recommending stronger language regarding implementation, including clearer accountability, timelines, and identification of responsible entities (“who does what by when”). We will also suggest expanding policy areas where needed based on community input.

5. Structure and Accessibility

We will provide input on the structure of the EJ content within the General Plan, including the potential value of a hybrid approach that elevates EJ as a clearly identifiable and accessible component while maintaining integration across relevant chapters.

We intend for our comment letter to be constructive and collaborative, with the shared goal of ensuring that Vallejo’s EJ Element is both compliant with SB 1000 and genuinely responsive to community needs.

We look forward to continuing to support the development of the Environmental Justice content for the General Plan. Thank you for your service to the Vallejo Community!



FRESH AIR VALLEJO | EJ4VALLEJO

Public Comment on Vallejo's Draft Environmental Justice General Plan Amendments

Community voice, pollution prevention, enforceable commitments, and a centralized plan

To: Director of Planning and Development; Planning Commission; Mayor and City Council, City of Vallejo

From: Fresh Air Vallejo

Prepared by: Lorene Allio PhD for Fresh Air Vallejo

Date: July 20, 2026

Re: Draft Environmental Justice General Plan Amendments dated March 6, 2026

Status: Public comment submission

REQUESTED ACTION. Do not adopt the March 2026 draft in its present form. Treat it as a preliminary staff compilation; conduct formal, City-led engagement in the ten impacted tracts; publish a community-informed revision with binding pollution-prevention and implementation commitments; and provide a new public review period before adoption.

Dear Director of Planning and Development, Planning Commissioners, Mayor, and Councilmembers:

Fresh Air Vallejo submits these comments on behalf of EJ4Vallejo and the Vallejo residents who have shared their experiences, priorities, and solutions. We recognize that the City has identified ten impacted census tracts, assembled environmental and health indicators, and highlighted environmental justice language across Vallejo General Plan 2040. Those steps establish a starting point. They do not yet constitute a community-driven, enforceable environmental justice plan.

The central question is not whether the draft mentions environmental justice topics. It is whether the final General Plan will change the decisions that create unequal exposure, direct investment to the

neighborhoods carrying the greatest burdens, and give residents a continuing role in implementation. The current draft does not answer that question. It is dispersed, largely discretionary, and missing the commitments, enforcement tools, timelines, funding paths, and public accountability needed to produce measurable change.

The City's project page states that the proposed amendments 'build upon existing General Plan policies.' The draft confirms that approach: five provisions are labeled EJ Policies and fifty-five are labeled EJ Actions, spread across four General Plan chapters. Existing language can be useful raw material. But collecting and relabeling policies that can be molded into environmental justice strategies is not a substitute for asking impacted residents what must change and then building the Plan around their answers.

Principal requests

1. **Pause adoption.** Do not move directly from the July 20 comment deadline to hearings on the present text. Treat the March document as the first staff draft.
2. **Conduct formal, targeted engagement.** Fund and carry out neighborhood-based outreach in the ten impacted tracts before preparing the next draft, with particular attention to South, West, North, and other underrepresented high-burden areas.
3. **Create one visible environmental justice plan.** Adopt a centralized EJ chapter or implementation plan that states community priorities, profiles each impacted area, cross-references binding policies, and tracks delivery. Retain enforceable policies in the relevant General Plan elements.
4. **Prevent added cumulative pollution.** Adopt a clear policy not to approve new or expanded significant pollution- or diesel-generating uses in or adjacent to already burdened communities when they would add to cumulative health risk.
5. **Protect neighborhoods from truck traffic.** Do not create or expand truck routes through residential areas or near schools, parks, childcare, senior housing, and other sensitive receptors; adopt a funded rerouting and enforcement program for existing conflicts.
6. **Replace weak verbs with commitments.** Convert 'consider,' 'encourage,' 'support,' 'periodically,' 'as feasible,' and 'should' into 'shall,' 'will,' 'require,' 'adopt,' or another defined deliverable wherever the City has authority.
7. **Add implementation and enforcement.** For every EJ policy and action, identify the lead department, partner agencies, priority geography, deadline, funding path, performance measure, public reporting schedule, and corrective action.
8. **Create community oversight.** Establish a representative EJ advisory body with a role in the revised draft, project review, budgeting, annual reporting, and recommended corrective action.

9. **Publish a revised draft and response matrix.** Show what residents asked for, what changed, what did not change and why, and provide at least one new meaningful public review period before adoption.

1. The draft lacks the community grounding that environmental justice requires

Environmental justice is both about outcomes and about power. California Government Code section 65302(h) requires General Plan objectives and policies that reduce unique or compounded health risks in disadvantaged communities, promote civic engagement in public decision-making, and prioritize improvements and programs that address those communities' needs. California DOJ explains that SB 1000 is intended to advance transparency and public engagement, reduce harmful pollutants and health risks, and expand equitable access to health-supporting benefits. DOJ has also stated in its enforcement work that an adequate General Plan should be developed in coordination with the local community and contain meaningful, tailored policies.

The City's record for the March 2026 draft does not show a formal, targeted process centered on residents of the ten identified impacted tracts. The draft says it was informed by prior engagement, but it does not provide an engagement record showing the dates and locations of EJ-focused meetings, the neighborhoods and languages represented, priorities ranked by impacted residents, alternatives co-developed with them, or changes made because of their input. A City webpage, a released staff draft, and a written-comment period give residents a chance to react. They do not give residents a meaningful role in defining the problems, choosing priorities, or drafting the solutions.

The problem is especially stark because proposed Action CP-4.1E promises engagement 'before significant resources are committed to a particular outcome.' The City should follow that principle now, before the environmental justice framework is adopted.

Fresh Air Vallejo's own survey, meetings, and reports help fill part of the information gap, but community organizations cannot cure the City's process failure. Our engagement was not a statistically representative citywide survey, was not designed to reach every impacted tract equally, and produced only one Spanish-language response. The City must not treat volunteer-led community work as a substitute for its own legal and public responsibilities. It should use this record as evidence, then fund a larger and more accessible process that reaches people who were not heard.

The Attorney General's Huntington Park settlement is instructive. It required a robust engagement strategy, partnerships with community organizations, a series of community meetings, a community survey, descriptions of each disadvantaged community developed with residents, tailored policies, and compliance benchmarks. DOJ's Fresno intervention likewise criticized policies that were vague or unenforceable and warned against adding industrial development to communities already experiencing high pollution and asthma burdens. Vallejo should correct these same weaknesses before adoption rather than after a challenge.

2. The current structure is a retrofit, not a coherent environmental justice program

Government Code section 65302(h) permits either a separate environmental justice element or related goals, policies, and objectives integrated into other elements. Integration is therefore lawful. But lawful form is not the same as effective design. Vallejo’s dispersed approach makes the program difficult for residents, decision-makers, staff, and funders to understand and nearly impossible to monitor as a whole.

The draft highlights sixty provisions across Community and People, Nature and the Built Environment, Economic Development, and Mobility. It does not bring them together into a community-defined theory of change. It has no consolidated statement of neighborhood priorities; no tract-by-tract needs and assets profile; no complete SB 1000 crosswalk; no implementation and enforcement matrix; no budget or funding strategy; no annual reporting cycle; and no procedure for correcting missed commitments.

The result is piecemeal: a food-access action here, a truck-route action there, housing and park language elsewhere, and engagement language separated from the decisions it should govern. Residents should not have to search four General Plan chapters to learn what the City promises their neighborhood, who is responsible, or when the work will occur.

One participant described the approach as “cherry picking things to designate as EJ.” Other participants asked for environmental justice to be brought together in one visible place and connected to every relevant General Plan element. That community request closely matches the structural problem in the draft.

Recommended structure: one plain-language EJ chapter or implementation plan that centralizes the community record, impacted-area profiles, objectives, priorities, implementation matrix, budget, metrics, annual reporting, and oversight—paired with binding policies retained in the General Plan elements that control land use, housing, mobility, facilities, and development.

3. Too much of the draft is discretionary and unenforceable

A strategy is not a commitment if the City can satisfy it by thinking about the issue, encouraging someone else, or taking an undefined step at an undefined time. Yet the draft repeatedly relies on terms such as ‘consider,’ ‘encourage,’ ‘support,’ ‘collaborate,’ ‘periodically,’ ‘as feasible,’ and ‘should.’ These verbs may be appropriate in limited contexts, but they cannot carry the core of an environmental justice program.

The problem is concrete. Action CP-1.14B says the City will ‘periodically review and consider alternating’ truck routes. That language contains an apparent drafting error—presumably ‘altering’—and still commits to no route change, no date, no map, no enforcement, and no exposure reduction. Action CP-1.14D merely ‘support[s] enforcement’ of the state idling limit. Action CP-5.6E encourages voluntary use of healthy building materials. Food and safety provisions frequently ask the City only to consider a program, zoning change, or study. These formulations do not tell residents what result they can expect.

The final Plan should use mandatory and action-oriented language and should pair every commitment with the information needed to implement it: what will be done; who will do it; where it will occur; when it will begin and end; how it will be funded; how progress and outcomes will be measured; how the public will receive the information; and what corrective action will follow if the City falls behind. Monitoring and reporting are necessary, but they cannot substitute for source reduction, enforcement, or delivery.

4. The community record shows why stronger strategies are necessary

These comments are grounded in 97 survey responses plus anonymous written comments, facilitator notes, and group discussions gathered through multiple community-outreach meetings held by Fresh Air Vallejo and their partners between October 2025 and July 2026. The survey used convenience sampling; it is not a randomized scientific or statistically representative sample and should not be used as a citywide prevalence estimate. It is a limited community-engagement record developed through Fresh Air Vallejo's time-limited outreach that identifies recurring experiences, priorities, and policy directions.

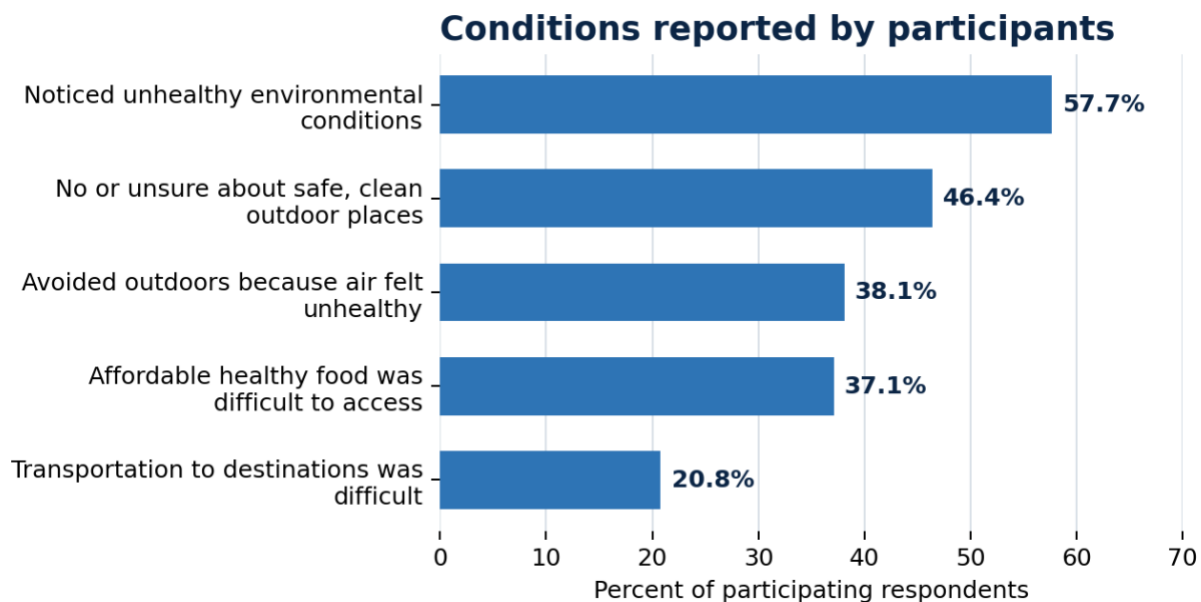


Figure 1. Conditions reported by participants. Source: FAV/EJ4Vallejo survey, n=97 except transportation n=96.

- 56 of 97 participants (57.7%) noticed unhealthy air or environmental conditions often or somewhat often; 37 (38.1%) avoided going outside at least somewhat often because the air felt unhealthy.
- 36 (37.1%) found affordable healthy food difficult to access. Thirty-six said their neighborhood lacked safe, clean outdoor places and nine were unsure—a combined 45 of 97 (46.4%).
- Reported health concerns included allergies (62), stress or anxiety (52), asthma (43), frequent headaches (31), skin rashes (21), trouble breathing (20), and heart conditions (13). These are respondent or household reports, not clinical diagnoses.

- Housing and location concerns included living near a highway or freeway (36), inadequate weatherization (26), living near a polluting industrial site (13), possible lead paint (11), contaminated soil (8), inadequate heating or cooling (8), and being unhoused (3).

“On hot days, at Curtola Parkway and Lemon Street, you cannot breathe if you stop at the light. You can’t have your windows open.”

Anonymous participant, EJ4Vallejo community engagement



Figure 2. Leading solutions selected by participants. Source: FAV/EJ4Vallejo survey; 96 answered the priority question and could select up to seven items.

The highest-ranked priorities show why the final Plan must do more than offer education, collaboration, and future consideration. Participants most often selected cleanup of dumping and contaminated sites (67 of 96), more trees and shade (50), housing for people who are unhoused (47), grocery stores in underserved areas (44), clean and safe parks (38), community gardens and food programs (37), and keeping polluting industry away from homes and schools (35). These are requests for public action, land-use protection, and investment.

The qualitative record reinforces these rankings and adds detail that the survey alone cannot capture. Participants described severe asthma, trash and dumping, unsafe and poorly maintained parks, youth walking in heat or struggling with transit cost and safety, housing moisture and drainage problems, fear of landlord retaliation, inadequate code enforcement, and unequal neighborhood investment. They requested renter protections and repair assistance, youth centers and jobs, reliable transit, a no-diesel approach to new diesel-intensive uses, Native American representation, a unified EJ plan, and an oversight body able to track implementation.

“Hold council accountable; currently there is no repercussion if they don’t enforce the policies.”

Anonymous participant, EJ4Vallejo community engagement

5. Place and racial equity must shape implementation

Environmental injustice is experienced by place. Ninety-four survey responses could be assigned to the project's Central, West, East, North, or South groupings; three remained unclassified. These are practical analytic categories, not precise or mutually exclusive lived geographies. South Vallejo occupies the southwest part of the city, and some residents of the South Vallejo neighborhood may reasonably have identified themselves with the West Side. The West and South results should therefore be read with this potential classification overlap in mind and, where relevant, considered together as part of Vallejo's southwest and waterfront environmental-justice context. The area samples are small and uneven, so comparisons should guide questions and outreach rather than be treated as neighborhood prevalence estimates. The low separately classified South count must not be interpreted as low need.

West Vallejo (n=24). The West group shows the clearest cumulative-burden pattern in this engagement record: 17 reported unhealthy conditions, 12 avoided going outside because of unhealthy air, 13 reported food difficulty, 10 of 23 reported transportation difficulty, and 13 said safe outdoor places were lacking or were unsure. Ten reported inadequate weatherization, 17 stress or anxiety, 12 asthma, eight skin rashes, and seven trouble breathing. The west and southwest waterfront's riverbank setting and adjacency to Mare Island make pollution, contaminated sites, shoreline access, truck and industrial activity, housing conditions, and emergency planning inseparable and compounded issues. Because some South Vallejo residents may have used West Side as their geographic identity, this pattern may partly reflect South and southwest Vallejo conditions.

South Vallejo (n=7). Only seven responses were separately classified as South Vallejo, but some South Vallejo residents may be represented in the West group because of the neighborhood's southwest location. Six of seven separately classified South respondents said safe outdoor places were lacking or were unsure; five selected cleanup; four selected keeping industry away from homes and schools; and four selected housing for people who are unhoused. The qualitative record described childhood asthma, traffic-related breathing problems near Curtola Parkway and Lemon Street, unsafe walking conditions, food-access barriers, unequal investment, and successful community organizing against an additional industrial burden. These signals require additional South and southwest Vallejo engagement before adoption.

"I grew up in South Vallejo and have had asthma since I was five."

Anonymous participant, EJ4Vallejo community engagement

North and East Vallejo. North respondents reported frequent unhealthy conditions and strong allergy and near-freeway signals; East respondents also reported substantial freeway proximity, allergies, and asthma. These patterns support corridor-specific work on traffic pollution, truck movement, filtration and weatherization, safe mobility, and land-use compatibility.

Central Vallejo. Central respondents strongly prioritized cleanup and brought substantial long-term resident knowledge. Central participation should inform citywide policy, but the larger response count there cannot substitute for targeted engagement in less-represented burdened areas.

What the race comparison suggests

The survey sample was nearly evenly divided between participants identifying as White only (49) and a combined group of people identifying as non-White, Hispanic/Latino, multiracial, or White together with another racial or ethnic identity (48). This is the primary race comparison because the groups are large and balanced, and because it respects Vallejo's diverse and mixed population rather than forcing participants into smaller mutually exclusive categories. The results are descriptive, not causal or statistically representative.

- The combined diverse group more often reported unhealthy conditions (30 of 48, 62.5%, versus 26 of 49, 53.1%); difficulty obtaining affordable healthy food (21 of 48, 43.8%, versus 15 of 49, 30.6%); transportation difficulty (12 of 48, 25.0%, versus 8 of 48 White-only respondents answering the question, 16.7%); living near a highway or freeway (21 of 48, 43.8%, versus 15 of 49, 30.6%); allergies (34 of 48, 70.8%, versus 28 of 49, 57.1%); and asthma (23 of 48, 47.9%, versus 20 of 49, 40.8%). Avoiding the outdoors because of unhealthy air was nearly the same (37.5% versus 38.8%).
- Both groups ranked cleanup of dumping and contaminated sites first: 32 of 47 diverse respondents answering the priority question (68.1%) and 35 of 49 White-only respondents (71.4%). This shared priority is a strong basis for citywide action.
- The combined diverse group selected safe, affordable public transportation more often (42.6% versus 22.4%), along with youth centers (40.4% versus 28.6%), healthy-housing inspections and repair assistance (23.4% versus 12.2%), and family-friendly public spaces (29.8% versus 18.4%). White-only respondents selected trees and shade more often (59.2% versus 44.7%), grocery stores in underserved areas (53.1% versus 38.3%), housing for people who are unhoused (55.1% versus 42.6%), and keeping polluting industry away from homes and schools (44.9% versus 27.7%). These differences should shape outreach questions, not be treated as proof that one group opposes another group's priorities.

The race/ethnicity question was check-all-that-apply. Checkbox counts above three were: White 55, Black/African American 19, Hispanic/Latino 15, more than one race 12, Asian/Pacific Islander 9, and Indigenous/Native American 4. These categories overlap. The smaller groups offer useful signals—for example, near-freeway and asthma concerns among Black and Asian/Pacific Islander participants, food and transportation difficulty among Hispanic/Latino and multiracial participants, and strong youth-center and transit priorities—but are too small for confident standalone conclusions. No formal claim of statistical significance is made.

6. Priority revisions to the City's proposed strategies

Fresh Air Vallejo reviewed all sixty provisions the City labels as EJ Policies or EJ Actions. The following revisions identify the most consequential deficiencies and the minimum direction the City should carry into a revised draft. They are written as policy directions; staff and counsel may refine technical terminology without weakening the commitment.

CP-1.13 and CP-1.14 | Make avoidance and source reduction the governing land-use rule

Why the draft is inadequate. The draft often protects new sensitive uses from existing pollution through health-risk assessments, setbacks, barriers, ventilation, and filters. Those tools may reduce exposure, but they can also normalize incompatible siting. For new industrial sources, CP-1.14A establishes a 1,000-foot separation yet allows an exception when a site-specific HRA says risk can be mitigated. That approach evaluates one project against a threshold without guaranteeing that the City will avoid adding to a community's cumulative burden.

Required revision. Adopt an avoidance-first policy. The City shall not approve a new or expanded significant source of toxic air contaminants, diesel particulate matter, hazardous emissions, or intensive truck activity in or adjacent to an impacted tract or sensitive receptor area when the project would increase cumulative health risk. Require an independent cumulative-impact assessment, disclosure of existing asthma and pollution indicators where reliable, alternatives analysis, source controls, enforceable permit conditions, monitoring, and a written finding of no increased cumulative health risk before any narrow exception. Do not treat filtration or barriers as substitutes for preventing new pollution at its source.

CP-1.14B and MTC-1.4D | Adopt binding truck-route protections

Why the draft is inadequate. CP-1.14B only commits the City to periodically review and consider 'alternating' truck routes—apparently a typo for 'altering.' MTC-1.4D generally calls for route review and enforcement but does not identify impacted neighborhoods, sensitive receptors, exposure targets, or a completion date. Neither provision prevents a new or expanded truck route through a residential area.

Required revision. Prohibit creation or expansion of designated truck routes through residential neighborhoods and within a defined protective distance of schools, parks, childcare, senior housing, healthcare facilities, and other sensitive receptors except for local delivery or emergency access. Within twelve months, publish an updated truck-route and conflict map; ground-truth it with residents; identify routes to remove or reroute; adopt time-of-day and weight restrictions where needed; install signs; fund enforcement; create a multilingual complaint channel; and report violations, enforcement, route changes, and exposure indicators annually.

CP-1.14C and CP-1.14D | Control diesel emissions and idling with City authority

Why the draft is inadequate. Requiring 'all feasible mitigation' for new truck-dependent development is too undefined, and merely supporting state idling enforcement leaves residents without a reliable local response. The provisions do not address City contracts, leases, permits, construction sites, freight hotspots, repeated neighborhood complaints, or community concern about diesel backup generation associated with data centers and other new energy-intensive uses.

Required revision. Define minimum zero- and near-zero-emission requirements for truck-dependent development; require charging or other necessary infrastructure; adopt a local anti-idling ordinance; and apply enforceable anti-idling conditions to City property, contracts, leases, permits, and construction approvals. Prohibit or strictly limit new routine diesel backup generation where zero-emission alternatives are feasible, and require health-risk and cumulative-impact review for any proposed exception. Post enforceable signage at hotspots; coordinate with CARB and CHP under a written protocol; track complaints and response times; and publish annual enforcement results. New diesel-intensive projects must also satisfy the no-added-cumulative-burden policy.

CP-1.14E through CP-1.14G | Turn contaminated-site language into a public cleanup program

Why the draft is inadequate. The draft supports cleanup and reuse and requires compliance with state and federal remediation rules. It does not create a complete public inventory, a priority schedule, early notice to nearby residents, community participation in cleanup choices, long-term tracking, or a clear rule against residential and other sensitive reuse before cleanup is complete.

Required revision. Create a public contaminated-site and illegal-dumping inventory; rank sites by exposure, proximity to residents and sensitive uses, and community priority; establish cleanup milestones and funding responsibility; require early multilingual notice and community participation; verify completion before sensitive reuse; maintain long-term controls and public records; and publish annual progress. Begin with impacted tracts and sites identified by residents, while preserving anti-displacement protections.

CP-5.6 and CP-5.6A–J | Make healthy housing enforceable and tenant-safe

Why the draft is inadequate. The housing package recognizes lead, mold, weatherization, rehabilitation, and complaints, but much of it depends on education, incentives, collaboration, and future funding. Recent community input also described drainage and moisture failures, aging furnaces or chimneys, flooding and wastewater concerns, high repair costs, inadequate code enforcement, and fear of landlord retaliation. The draft does not guarantee proactive inspection, defined response times, remediation, relocation support, protection against retaliation, or prevention of displacement. Voluntary healthy materials are not enough.

Required revision. Adopt a risk-based proactive rental inspection and healthy-housing program, with a landlord registry if legally appropriate; clear complaint-response and correction deadlines; lead, mold, moisture, drainage, ventilation, heating, cooling, and weatherization standards; grants and technical assistance for low-income owners; temporary relocation support; tenant notice, anti-retaliation, and anti-displacement protections; and public reporting by neighborhood. Create accessible repair-assistance pathways so health and safety corrections do not depend on a household's ability to pay. Use mandatory healthy-material standards where the City has authority, especially in City-funded and regulated projects.

CP-1.1C–I and CP-1.2F–G | Measure whether residents can actually obtain affordable healthy food

Why the draft is inadequate. The draft identifies useful tools—neighborhood markets, CalFresh/WIC, fresh produce, urban agriculture, and community gardens—but repeatedly uses ‘consider’ and does not identify South Vallejo or other impacted tracts as the first priority. It measures activity rather than whether residents gain affordable, culturally appropriate access.

Required revision. Launch a healthy-food access program by a stated date, beginning with South Vallejo and other impacted areas. Pursue partnerships and grants that can bring small scale farmers markets to food deserts using public spaces such as community centers. Adopt a zoning and incentive package after community review; support a grocery store, cooperative, small neighborhood markets, culturally relevant vendors, gardens, and food programs; and measure affordability, staple availability, CalFresh/WIC participation, travel time, resident satisfaction, and displacement risk.

CP-3.5D, MTC-2.4C–F, and MTC-2.5 | Fund safe parks, shade, sidewalks, ADA access, and daily mobility

Why the draft is inadequate. The draft contains promising language on park planning, multimodal access, ADA transition planning, and prioritizing impacted tracts, but it provides few dates, investment targets, maintenance commitments, service standards, or neighborhood project lists. Community input described trash and unsafe conditions in parks and along streets, youth walking in heat without nearby bus stops, unaffordable or unsafe transit, highway barriers, and community facilities constrained by limited hours or maintenance resources. ‘Collaborate’ and ‘prioritize’ can remain aspirational without a funded schedule.

Required revision. Within twelve months, complete a public inventory of sidewalk gaps, curb ramps, crossings, lighting, shade, park access, shoreline access, transit barriers, community-facility access, and unsafe or poorly maintained public spaces in impacted tracts. Adopt measurable service, maintenance, and tree-canopy targets; a funded capital and operations schedule; affordable transit measures; and anti-displacement protections. Co-design projects with residents and youth, including evaluation of community priorities such as White Slough protection and improved regional open space and shoreline access around the Mare Island Strait.

CP-4.1D–E, CP-4.2E–F, and CP-4.4C | Make civic engagement and health accountability operational

Why the draft is inadequate. These provisions describe partnerships, early engagement, language access, underrepresented participation, and a health report card. They do not establish minimum engagement standards, dedicated funding, representative decision-making, response-to-comments, reporting dates, or a corrective-action process. Community input also identified concrete barriers to participation, including multiple jobs, limited time, transportation, intimidation or fear of speaking out, and the exclusion of youth voices. The draft risks relying on community organizations to perform unfunded City work in the most underfunded nonprofit sector in the Bay Area and is not in compliance with SB100.

Required revision. Adopt a City-funded EJ engagement protocol covering early notice, neighborhood locations and varied times, interpretation and translation, plain-language materials, disability access, childcare, food, transportation support, and stipends where appropriate. Establish a representative EJ advisory body with meaningful youth participation, Native American and appropriate Tribal representation, renters, and residents of impacted areas. Publish an annual community health and implementation report with tract-level data where valid, budget status, missed milestones, and corrective action; do not use monitoring as a substitute for pollution reduction.

Cross-cutting climate and emergency actions | Protect residents during smoke, heat, flooding, industrial incidents, and outages

Why the draft is inadequate. The highlighted strategies do not yet form a neighborhood-specific system for compounded climate and emergency risks. Residents described wildfire smoke, refinery incidents, breathing difficulty, inadequate heating and cooling, flooding and drainage failures, sea-level-rise concerns, shoreline restoration needs, and uneven confidence in alerts and safe places.

Required revision. Map compounded climate, air, flood, drainage, sea-level-rise, shoreline, heat, outage, and evacuation risks with residents; establish accessible clean-air and cooling centers; provide multilingual and disability-accessible alerts; identify backup power and transportation needs; distribute filtration and protective resources to high-risk households; conduct after-incident public reporting; support shoreline restoration and neighborhood-scale resilience; and tie capital investment to the most burdened areas first.

7. The City should adopt a centralized environmental justice implementation plan

A centralized plan is not a request to remove environmental justice from the land-use, housing, mobility, facilities, and economic-development decisions where it belongs. It is a request to make the program visible, coherent, enforceable, and accountable. The final package should include all of the following in one location:

- A community-defined environmental justice vision and a concise statement of the historical and present conditions the City commits to change.
- A profile of each impacted tract and other locally identified burdened area, combining CalEnviroScreen and other reliable data with resident ground-truthing, assets, needs, and priority projects.
- A complete crosswalk showing how every requirement of Government Code section 65302(h) is addressed and where each binding policy appears in the General Plan.
- A no-added-cumulative-burden land-use policy, truck-route protections, healthy-housing requirements, cleanup commitments, and measurable access standards for food, parks, shade, sidewalks, transit, and public facilities.
- An implementation matrix for every EJ policy and action: lead department, partners, priority geography, start date, completion date, funding source, output and outcome measures, public reporting, and corrective action.
- A multiyear budget and capital-improvement crosswalk showing which projects are funded, unfunded, delayed, or complete, with impacted communities receiving first-priority investment where needs are greatest.
- A standing community oversight structure with residents of impacted areas, youth, renters, and Native American and appropriate Tribal representation; an annual public report and hearing; an accessible dashboard; and a formal process for amending strategies when data or community experience shows they are not working.

8. Required engagement before the next draft

The City should use the close of the current comment period as the beginning of a formal co-development phase. At minimum, the process should:

1. **Publish the existing record.** Release the prior-engagement materials the City relied upon, including dates, locations, methods, participation, languages, neighborhood representation, key findings, and how those findings shaped the March draft.
2. **Go to each impacted area.** Hold multiple listening sessions, participatory mapping exercises, and solution workshops in accessible neighborhood locations, with additional recruitment in South and other underrepresented communities.
3. **Remove participation barriers.** Provide translated materials and interpretation based on neighborhood language needs; disability access; varied meeting times; food; childcare; transportation support; phone and paper options; and stipends or compensation where appropriate.

4. **Include people most often excluded.** Recruit youth, elders, renters, unhoused residents, people with disabilities, non-English speakers, low-income homeowners, workers exposed to environmental hazards, urban Indigenous residents, and appropriate Tribal representatives.
5. **Co-develop and rank alternatives.** Ask residents to shape the actual language, identify no-go land-use conditions, rank projects and investments, define success measures, and review the implementation matrix before staff finalizes it.
6. **Show the City's response.** Publish a comment-and-response matrix and a redline explaining what changed, what did not change, and why.
7. **Provide another review period.** Release the revised draft for a new meaningful public comment period before Planning Commission and City Council action.

Conclusion

Vallejo has an opportunity to adopt an environmental justice program worthy of the people who have lived with the consequences of past land-use, infrastructure, housing, and investment decisions. The March 2026 draft identifies many of the right subjects, but it does not yet reflect a genuine community mandate or provide a dependable path to change.

The City should not adopt a document that asks future staff to consider, encourage, support, or periodically revisit the conditions residents are experiencing now. It should make clear commitments: no additional cumulative pollution in already burdened areas; no new or expanded truck routes through residential and sensitive-receptor areas; cleanup and healthy-housing programs with enforcement; measurable access to food, parks, shade, sidewalks, transit, and public facilities; a centralized implementation and accountability plan; and continuing community power over the decisions that affect health and place.

Fresh Air Vallejo asks the City to pause, engage, revise, and return with a stronger draft. Community members have already identified the problems and proposed practical solutions. The City's responsibility now is to meet them with formal outreach, binding policy, funded implementation, and transparent accountability.

Respectfully submitted,

Fresh Air Vallejo / EJ4Vallejo

Selected authorities and record sources

These sources support the legal and factual statements in this comment. The community findings are descriptive engagement evidence, not a statistically representative estimate of Vallejo's population.

1. [City of Vallejo — GPAs for Environmental Justice](#) — Project status, ten identified tracts, comment period, and the City's statement that the draft builds upon existing General Plan policies.
2. [City of Vallejo — Draft Environmental Justice General Plan Amendments \(March 6, 2026\)](#) — Primary draft reviewed, including five highlighted EJ policies and fifty-five highlighted EJ actions.

3. [California Government Code § 65302\(h\)](#) — Requirements to reduce unique or compounded health risks, promote civic engagement, and prioritize improvements for disadvantaged communities.
4. [California Department of Justice — Environmental Justice in Local Land Use Planning / SB 1000 Best Practices](#) — State guidance, example policies, community-engagement methods, and enforcement materials.
5. [California DOJ — Huntington Park SB 1000 settlement announcement](#) — Community coordination, robust engagement, tailored policies, and compliance benchmarks.
6. [California DOJ — Fresno County General Plan environmental justice intervention](#) — Critique of vague, unenforceable policies and added industrial burdens in communities already experiencing high pollution and asthma risk.



FRESH AIR VALLEJO | EJ4VALLEJO

Environmental Justice in Vallejo

Integrated Findings from Community Survey Data and Resident Testimony

October 2025–July 2026

Prepared by Lorene Allio PhD on behalf of Fresh Air Vallejo

October 2025–July 2026

This report documents Fresh Air Vallejo’s preliminary community-engagement findings through July 2026. It does not claim that to statistically represent Vallejo’s entire population, and it does not replace continued City of Vallejo engagement with neighborhoods carrying the greatest environmental burdens.

Executive summary

Across survey measurements and resident testimony, the same conclusion emerges: environmental conditions, health, housing, food access, mobility, public space, and community power are interconnected—and they are experienced differently by place and social circumstance.

- Fifty-six of 97 participants (58%) noticed unhealthy air or environmental conditions often or somewhat often; 37 (38%) avoided going outside at least somewhat often because the air felt unhealthy.
- Forty-five participants (46%) either said their neighborhood lacked safe, clean outdoor places or were unsure. Thirty-six (37%) found affordable healthy food difficult to access, and 20 of 96 (21%) reported transportation difficulty.
- Reported health concerns included allergies (62), stress or anxiety (52), asthma (43), frequent headaches (31), skin rashes (21), trouble breathing (20), and heart conditions (13). These were respondent or household reports, not clinical diagnoses.
- Resident testimony adds lived context: childhood and youth asthma; wildfire smoke and refinery concerns; traffic-related breathing problems; trash and dumping; unsafe or poorly maintained parks; youth transportation and heat exposure; housing moisture, drainage, and code-enforcement problems; fear of landlord retaliation; food-access barriers; noise and light pollution; and concern about cumulative burdens.
- The strongest priorities combine pollution cleanup and prevention with trees and shade, housing, food access, safe parks, youth opportunity, transportation, healthy homes, and meaningful community participation.
- West Vallejo shows the survey's clearest cumulative-burden pattern. The West and South classifications should not be treated as perfectly distinct lived identities because South Vallejo occupies the southwest part of the city and some South Vallejo residents may have identified with the West Side. South Vallejo's seven separately classified responses are too few for area-wide estimates, but their outdoor-space, land-use, cleanup, and housing signals—together with the qualitative record—make targeted South and southwest Vallejo engagement essential.

Purpose and relationship to the next phase

This report consolidates the community record. It is intentionally different from the final public-comment submission that will follow. The future public comment should be understandable on its own: it should briefly restate the core evidence, explain the environmental-justice significance, identify deficiencies in the City's draft, and present specific requested changes. It may cite this report for detail, but readers should not need this report in hand to understand the comment.

1. Why environmental justice and community knowledge matter

Environmental justice work asks more than whether a city has environmental programs. It asks who is exposed to pollution and risk, who has access to health-supporting resources, whose neighborhoods receive investment and protection, and who has meaningful influence over decisions. In Vallejo, the community record shows that air quality, contaminated sites, traffic, housing quality, food access, safe public space, climate hazards, and economic conditions are not separate experiences. They can accumulate in the same households and neighborhoods.

Community knowledge is therefore a form of evidence. Environmental and demographic datasets can identify broad patterns, while resident testimony can reveal how those patterns are experienced in daily life, where official data may miss localized conditions, and which solutions residents consider practical and urgent. Neither source should replace the other. Used together, they provide a stronger basis for place-based planning, resource allocation, implementation, and accountability.

Environmental justice has distributive, procedural, and corrective dimensions: burdens and benefits should be addressed fairly; affected residents should shape decisions; and communities carrying cumulative burdens should receive priority attention and measurable action.

2. Sources and analytic approach

Source	Contribution to this report
Community survey	97 responses: 96 English-language and one Spanish-language response; collected through community engagement and updated through July 2026.
Qualitative community engagement	Anonymous written comments, facilitator notes, and group discussions from community-engagement meetings held between October 2025 and July 2026.
What We Have Heard So Far	A July 2026 synthesis organizing community recommendations across pollution, housing, food, public space, climate and emergency risks, and community accountability.
Five-area geography	Project-supplied assignment of 94 responses to North, South, East, West, or Central; three responses remained unclassified.
Demographic comparisons	Descriptive comparisons for paired groups with more than 35 participants, including White-only and combined diverse racial/ethnic identities.

The qualitative synthesis and underlying written comments, facilitator notes, and group discussions arise from the same community-engagement record. They are used for context and thematic interpretation, not treated as independent counts or assigned to individual meetings.

The survey analysis is descriptive. Percentages apply only to participating respondents and are not citywide prevalence estimates. Qualitative material was reviewed across the engagement period for recurring experiences, proposed solutions, and place references. Short quotations are anonymous and lightly edited only for spelling and punctuation; comments are not attributed to particular meetings. Participant accounts are reported as lived experience and perception and were not independently verified as exposure or medical findings.

Participation profile

Participant characteristic	Count	Percent of 97
Total responses	97	100.0%
White only	49	50.5%
Combined diverse racial/ethnic identities	48	49.5%
Age 55–70 or 71+	60	61.9%
Selected homeowner	61	62.9%
Selected renter	15	15.5%
Selected worker	47	48.5%

Roles were check-all-that-apply and are not mutually exclusive. The combined diverse identity group includes anyone identifying as non-White, Hispanic/Latino, multiracial, or White together with another racial/ethnic identity.

3. Quantitative findings at a glance

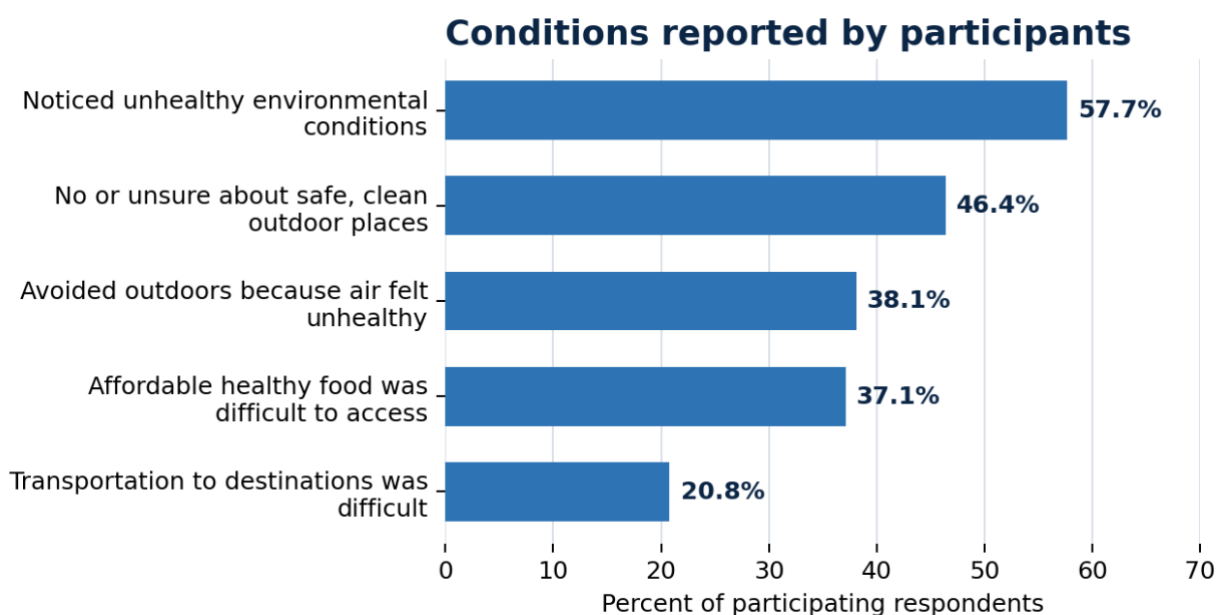


Figure 1. Core conditions reported by participating respondents

Transportation uses N=96 because one respondent did not answer that question. All other indicators use N=97.

These indicators should be read together. A household may experience unhealthy air, difficulty reaching services, inadequate housing protection, limited food access, and lack of safe outdoor space at the same time. This overlap is central to cumulative-burden analysis.

4. Integrated findings by environmental-justice theme

Pollution exposure and air quality

Survey evidence documents widespread concern about environmental conditions. Fifty-six participants (58%) noticed unhealthy air or environmental conditions often or somewhat often, and 37 (38%) avoided going outside at least somewhat often because the air felt unhealthy. Thirty-six (37%) reported living close to a highway or freeway, and 13 (13%) reported living close to a polluting industrial site.

“On hot days, at Curtola Parkway and Lemon Street, you cannot breathe if you stop at the light. You can’t have your windows open.”

Anonymous participant, EJ4Vallejo community engagement

The qualitative record described wildfire smoke, refinery incidents, traffic and truck pollution, odors from industrial or home-based activities, widespread trash and dumping, and concern about cumulative exposure. Participants also raised concern about diesel backup generation associated with data centers and other energy-intensive uses. Community recommendations call for enforceable truck routes and a local anti-idling ordinance, separation between diesel-intensive uses and sensitive locations, cleaner and zero-emission equipment, cumulative health-risk review, more neighborhood air monitoring, and stronger action on illegal dumping and contaminated land.

Environmental-justice significance: exposure is shaped by land use and location. Monitoring is useful, but community input consistently favors prevention, source reduction, cleanup, and enforceable protection.

Health and cumulative risks

Health concern reported for respondent or household	Count	Percent of 97
Allergies	62	63.9%
Stress or anxiety	52	53.6%
Asthma	43	44.3%
Frequent headaches	31	32.0%
Skin rashes	21	21.6%
Trouble breathing	20	20.6%
Heart condition	13	13.4%

These are self-reported concerns affecting respondents or household members. They are not clinical diagnoses and should not be interpreted as disease prevalence.

“I grew up in South Vallejo and have had asthma since I was five. My family has experienced asthma and cancer living in Vallejo.”

Anonymous participant, EJ4Vallejo community engagement

The qualitative record connects health not only to air pollution but also to wildfire smoke, stress, noise, light, housing conditions, and inability to use outdoor space. A youth participant reported asthma and air-quality problems serious enough to require hospital care. This supports an environmental-justice approach that evaluates combined exposure, vulnerability, and access rather than treating one pollutant or one health outcome in isolation.

Safe, healthy, and affordable homes

Housing or location condition	Count	Percent of 97
Close to highway/freeway	36	37.1%
Lacks weatherization	26	26.8%
Close to polluting industry	13	13.4%
Lead paint	11	11.3%
Lacks heating/cooling	8	8.2%
Contaminated soil	8	8.2%
Currently unhoused	3	3.1%

Housing and location questions were check-all-that-apply. A blank response cannot be assumed to mean that no condition existed.

The qualitative record emphasizes removing mold, lead, contaminated soil, pests, moisture, drainage failures, unsafe furnaces or chimneys, and other hazards without displacing tenants. Participants described flooding and wastewater concerns, inadequate code enforcement, high repair costs, and fear of eviction or retaliation when renters report unhealthy conditions. Recommendations include weatherization and filtration assistance, home-repair grants, a rental-property registry and proactive inspection system, complaint-response deadlines, tenant protections, and preservation of affordable housing.

Environmental-justice significance: the home is a primary place of exposure and protection. Housing quality, affordability, tenant rights, filtration, heating and cooling, and anti-displacement measures must be treated as environmental-health strategies.

◆ Affordable, healthy, and culturally relevant food

Thirty-six participants (37%) said affordable healthy food was difficult or very difficult to access. Participants also ranked grocery stores in underserved areas fourth among all solutions (44 selections), and 37 selected community gardens, farmers markets, and food programs.

“South Vallejo has been trying to get a food co-op or grocery store but has not been able to.”

Anonymous participant, EJ4Vallejo community engagement

The earlier recommendations identify South Vallejo and other underserved areas as priorities for a community-owned grocery store, affordable full-service grocery options, mobile markets, farmers

markets, community gardens, urban farms, and culturally relevant food businesses. They also call for City land, funding, zoning, small-business assistance, safer transportation access, and ongoing measures of affordability and use.

Environmental-justice significance: food access is shaped by land use, transportation, household income, commercial investment, and neighborhood power. It is an environmental-justice issue, not merely a retail-market question.

♣ Parks, trees, sidewalks, mobility, and public space

Thirty-six participants (37%) said their neighborhood lacked safe, clean outdoor places, and another nine (9%) were unsure. Twenty of 96 (21%) reported difficulty safely reaching work, school, services, or other destinations. More trees, shade, and green space ranked second among solutions (50 selections), while 38 selected clean and safe parks, 31 selected safe and affordable public transportation, and 24 selected complete streets.

“People should not have to walk or ride a wheelchair in the road.”

Anonymous participant, EJ4Vallejo community engagement

Resident input described the value of ADA curb cuts and safer sidewalks and proposed traffic calming, mechanized street sweeping, walking paths, organized group walks, parks, tree planting, White Slough protection, and evaluation of a regional park on the southern end of Mare Island. Youth described walking in heat without nearby bus stops, lacking bus fare, feeling unsafe on transit, and encountering trash or unsafe conditions in parks and near libraries and homes. The recommendations stress maintenance, affordable transportation, youth-accessible community facilities, safe routes to school, and improvements that do not displace current residents.

Environmental-justice significance: access to parks, shade, safe walking and rolling routes, transit, and maintained public space affects respiratory health, heat exposure, physical activity, social connection, and access to daily needs.

☼ Climate hazards, emergencies, noise, and light

“I remember waking up choking from wildfires.”

Anonymous participant, EJ4Vallejo community engagement

The qualitative record described wildfire smoke, refinery concerns, extreme-weather exposure, flooding and drainage failures, sea-level rise, shoreline-restoration needs, noise, and light pollution. Twenty-one survey participants selected safe indoor spaces during unhealthy air or extreme weather as a priority. Community recommendations call for trusted clean-air, heating, and cooling locations; home weatherization and filtration; multilingual warnings; clear instructions and after-incident reporting; neighborhood-scale flood and shoreline resilience; and attention to the effects of noise and nighttime lighting on sleep, stress, learning, and wildlife.

Environmental-justice significance: climate and emergency risks compound existing pollution, housing, health, transportation, and income burdens. Preparedness should therefore prioritize residents with the least ability to avoid or recover from exposure.

Community participation, accountability, and implementation

The qualitative record calls for the earliest and largest investments in neighborhoods with the greatest burdens and fewest resources, transparent criteria for City spending and enforcement, a unified and visible EJ plan, and an independent community-led Environmental Justice Advisory Group. Participants requested meaningful youth participation, Native American and appropriate Tribal representation, renter representation, accessible public information, translation, training, and compensation. They also described barriers to engagement including multiple jobs, limited time, transportation, intimidation or fear of speaking out, and exclusion from formal voting because of age.

“I can’t vote.”

Anonymous youth participant, EJ4Vallejo community engagement

The survey’s solution pattern supports this broad approach. Participants did not select one isolated intervention; they prioritized cleanup, greening, housing, food, parks, youth facilities, transportation, tenant protections, health programs, and land-use controls. Implementation must therefore identify responsible entities, schedules, funding, geographic priorities, measures, public reporting, and corrective action.

Environmental-justice significance: procedural justice is substantive. When residents help define problems, select priorities, evaluate alternatives, and track implementation, plans are more likely to respond to actual neighborhood conditions.

5. Solutions participants prioritized

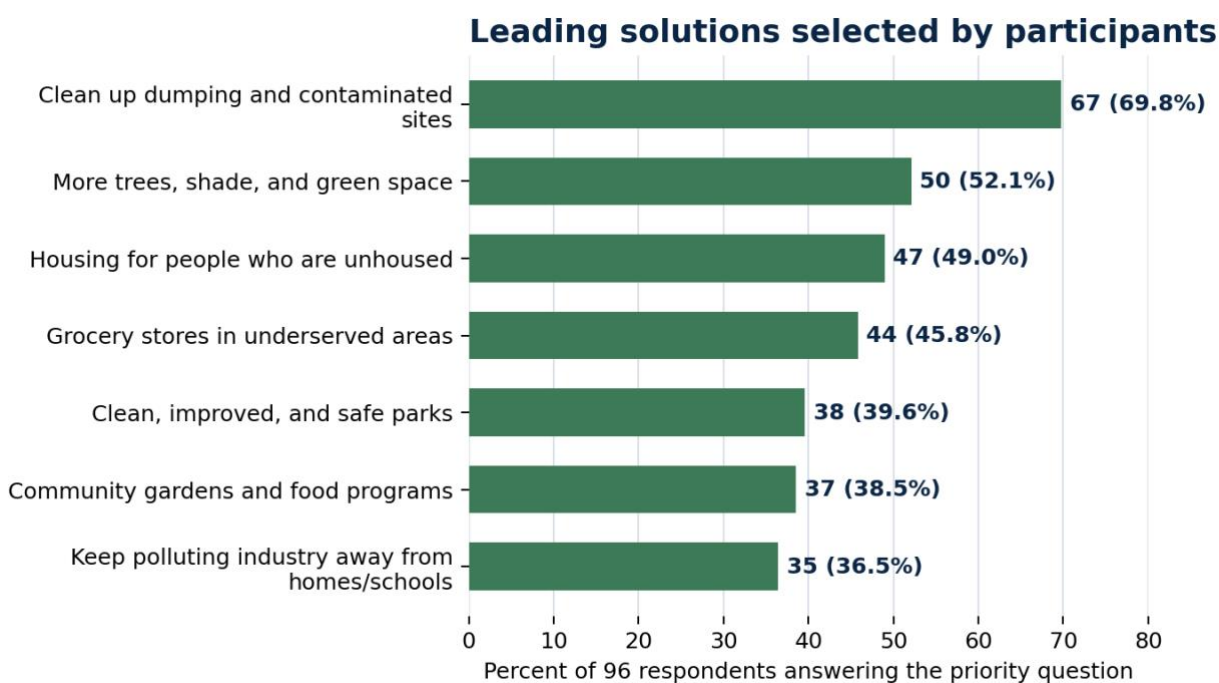


Figure 2. Seven leading solutions selected by survey participants

N=96 for this question. Respondents could select up to seven solutions, so percentages do not sum to 100%.

The rankings closely match the qualitative record. Cleanup, trees, safe public space, food access, housing, industrial separation, youth opportunity, transportation, and healthy-housing assistance appear both as survey priorities and as detailed resident proposals. This convergence gives the findings greater practical weight even though the engagement sample is not statistically representative.

6. Place matters: North, South, East, West, and Central

Environmental injustice is experienced geographically. The project's neighborhood assignments classified 94 responses into Central (28), West (24), East (22), North (13), and South (7); three responses remained unclassified. These assignments placed each response in one analytic group, so respondents were not double-counted. However, the categories are not precise or mutually exclusive lived geographies: South Vallejo occupies the southwest part of the city, and some residents of the South Vallejo neighborhood may reasonably have selected or described themselves as West Side residents. The West and South findings should therefore be read with this potential classification overlap in mind and, where relevant, considered together as part of Vallejo's southwest and Napa River waterfront context. The table reports counts and percentages within each assigned group and should be used to identify patterns and follow-up questions, not to estimate conditions for entire area populations.

Area	N	Unhealthy conditions	Food difficult	Transport difficult	No/unsure outdoor space
North	13	11/13 (84.6%)	5/13 (38.5%)	2/13 (15.4%)	4/13 (30.8%)
South	7	2/7 (28.6%)	2/7 (28.6%)	2/7 (28.6%)	6/7 (85.7%)
East	22	12/22 (54.5%)	9/22 (40.9%)	4/22 (18.2%)	10/22 (45.5%)
West	24	17/24 (70.8%)	13/24 (54.2%)	10/23 (43.5%)	13/24 (54.2%)
Central	28	12/28 (42.9%)	6/28 (21.4%)	1/28 (3.6%)	11/28 (39.3%)

West transportation uses N=23 because one respondent did not answer that question. South and North have small samples; report counts as well as percentages.

✦ West: cumulative burden across multiple domains

West shows the survey's broadest concentration of environmental and social burdens. Seventeen of 24 respondents noticed unhealthy conditions often or somewhat often; 12 avoided going outside because the air felt unhealthy; 13 reported food-access difficulty; 10 of 23 reported transportation difficulty; and 13 lacked safe outdoor space or were unsure. Ten reported inadequate weatherization; 17 reported stress or anxiety; 12 asthma; eight skin rashes; and seven trouble breathing. Because some South Vallejo residents may have identified with the West Side, this pattern may partly reflect conditions experienced in South and southwest Vallejo.

This pattern is consistent with—but does not establish causation from—the west and southwest waterfront's proximity to Mare Island and its industrial and contaminated-site legacy, older housing, shoreline and riverbank conditions, and overlapping social and economic burdens. The results support evaluating the broader west/southwest waterfront as a cumulative-burden environmental-justice context rather than treating West only as a rigid geographic quadrant.

✦ **South: strong qualitative importance and insufficient survey representation**

Only seven survey responses were separately classified as South Vallejo. Six of seven either lacked safe, clean outdoor places or were unsure; five prioritized cleanup; four prioritized keeping polluting industry away from homes and schools; and four prioritized housing for people who are unhoused. The smaller count reporting frequent unhealthy conditions—two of seven—must not be interpreted as evidence of lower burden. Respondents were assigned to only one analytic group, but some South Vallejo residents may be represented in the West group because South Vallejo is also geographically part of the city’s southwest side.

South’s small separately classified sample must be read with both the potential West/South overlap and the qualitative record, which includes childhood and youth asthma, traffic-related breathing concerns, unsafe walking and public-space conditions, food-access barriers, unequal investment, and successful community organizing against an additional industrial burden. Limited separate classification is a reason for more targeted South and southwest Vallejo engagement, not a finding of lower need.

✦ **North, East, and Central**

- North shows an exposure-centered pattern: 11 of 13 noticed unhealthy conditions often or somewhat often, 11 reported allergies, and eight lived near a highway or freeway. Priorities combine cleanup with youth facilities, youth jobs, housing, and community infrastructure that reduces violence.
- East combines highway exposure with food, transportation, and housing concerns. Fourteen of 22 reported living near a highway or freeway, 15 reported allergies, and 11 asthma. Grocery stores, trees and shade, public transportation, food programs, housing, and tenant protections were prominent priorities.
- Central reported fewer food and transportation barriers than the other larger areas, but 24 of 28 selected cleanup. Twenty of Central’s 28 responses came from Vista/Vista de Vallejo, and the area sample had especially high homeowner and older-adult participation. Outreach beyond Vista is needed to validate the pattern.

7. Differences across participating groups

The project requested a comparison between people identifying as White only and everyone identifying as non-White, Hispanic/Latino, multiracial, or White together with another racial or ethnic identity. The diverse population was intentionally kept combined rather than divided into small subgroups. Other paired comparisons were included only where both groups had more than 35 participants.

Comparison	Descriptive pattern in the engagement sample
Combined diverse identities (n=48) vs. White only (n=49)	More often reported unhealthy conditions (63% vs. 53%), food-access difficulty (44% vs. 31%), transportation difficulty (25% vs. 17%), allergies (71% vs. 57%), asthma (48% vs. 41%), and living near a highway/freeway (44% vs. 31%).

Comparison	Descriptive pattern in the engagement sample
Lower age categories (n=37) vs. age 55+ (n=60)	More food-access difficulty (46% vs. 32%), stress/anxiety (70% vs. 43%), and headaches (43% vs. 25%) among participants ages 18–55.
Did not select homeowner (n=36) vs. homeowner (n=61)	More unhealthy-condition exposure (69% vs. 51%), outdoor avoidance (53% vs. 30%), and transportation difficulty (34% vs. 13%) among participants who did not select homeowner.
Worker (n=47) vs. did not select worker (n=50)	Workers reported more food-access difficulty (45% vs. 30%) and headaches (43% vs. 22%); those not selecting worker more often avoided outdoors (46% vs. 30%).

These are unadjusted descriptive comparisons, not tests of statistical significance. Age, tenure, race/ethnicity, outreach setting, and geography overlap and cannot be separated with this sample.

The differences are consistent with an environmental-justice concern: respondents outside the White-only group, younger participants, and those not selecting homeowner reported higher burdens on several measures. They do not prove why those differences occurred, but they support continued attention to racial equity, housing tenure, age, income-related access, and place in future engagement and implementation.

8. What the quantitative and qualitative evidence shows together

- The qualitative record explains the numbers. Survey percentages establish the breadth of reported concerns; resident accounts show how conditions affect breathing, outdoor activity, mobility, sleep, stress, food access, and daily decisions.
- Community priorities are internally consistent across methods. Cleanup, pollution prevention, trees, housing, food access, parks, safe mobility, healthy homes, youth opportunity, and accountable implementation recur in both the survey and the qualitative engagement record.
- Place changes the meaning of the findings. West shows multiple overlapping survey burdens, but potential West/South self-identification overlap means the two groups should not be treated as completely distinct lived geographies. South's small separately classified count must be supplemented by qualitative testimony and additional targeted South and southwest Vallejo outreach.
- Environmental conditions and social conditions interact. Housing quality, transportation, income, food access, age, and community investment affect both exposure and the ability to avoid or recover from environmental harm.
- Residents are asking for implementation, not only recognition. Proposed solutions repeatedly include enforceable routes and buffers, diesel controls, cleanup, inspections and repair assistance, tenant anti-retaliation protections, public investment, accessible alerts, accountable timelines, a unified EJ plan, and continued community oversight with youth and Native representation.

9. Implications for Vallejo’s environmental-justice planning

This engagement record supports a planning approach that connects documented burdens to specific, geographically targeted, and measurable action. The following implications arise directly from the combined evidence:

- Use cumulative-burden analysis that combines pollution sources, health vulnerability, housing, food, mobility, climate risks, and socioeconomic conditions with community ground-truthing.
- Prioritize source reduction, incompatible-use prevention, cleanup, and enforceable protection before relying only on monitoring, filters, education, or voluntary measures.
- Treat healthy housing, food access, parks, trees, sidewalks, ADA access, transportation, and climate-safe indoor space as core environmental-justice infrastructure.
- Target early investment and follow-up engagement to areas carrying multiple burdens or missing from the record—especially the west/southwest waterfront and separately classified South Vallejo—while avoiding displacement and preserving citywide access.
- Create a transparent implementation structure identifying responsible departments and partners, priority locations, schedules, funding, output and outcome measures, public reporting, and corrective action.
- Maintain an ongoing, accessible, multilingual, and community-led participation structure through plan revision and implementation, with meaningful roles for youth, renters, Native American and appropriate Tribal representatives, and residents of impacted neighborhoods.

10. Limitations and priorities for continued engagement

This was a self-selected community-engagement sample (convenience sample) shaped by outreach locations and partner networks. It included comparatively high participation from homeowners and people selecting the two oldest age categories. Only one Spanish-language survey response was received. Renters, younger adults, Spanish-speaking residents, and several neighborhoods were underrepresented. South Vallejo was underrepresented as a separately classified survey category, although potential West/South self-identification overlap makes its exact representation uncertain.

Health items included respondents or household members and were not clinical diagnoses. Identity and role questions allowed multiple selections. Geographic entries ranged from broad areas to named neighborhoods, and the West/South boundary reflects lived identity as well as map assignment. Segment and area comparisons were descriptive, unadjusted, and not statistically tested. Qualitative notes summarize comments and discussions across the engagement period; they are not independent counts, should not be treated as frequency measures, and do not establish exposure levels or causal relationships.

The proper response to these limitations is not to discard the findings. It is to use them as documented community evidence, pair them with environmental and administrative datasets, and continue targeted engagement where the record is thin.

Appendix A. Full survey solution rankings

Rank	Solution	Count	Percent of 96
1	Clean up illegal dumping/contaminated sites	67	69.8%
2	More trees, shade and green space	50	52.1%
3	Housing for people who are unhoused	47	49.0%
4	Grocery stores in underserved areas	44	45.8%
5	Clean, improved and safe parks	38	39.6%
6	Community gardens, farmers markets and food programs	37	38.5%
7	Keep polluting industry away from homes/schools	35	36.5%
8	Youth center with programs and services	33	34.4%
9	Safe, affordable public transportation	31	32.3%
10	Community infrastructure that reduces violence	28	29.2%
11	Tenant protections and housing retention	26	27.1%
12	Complete streets	24	25.0%
13	Family-friendly public spaces	23	24.0%
14	Active transportation and transit connections	21	21.9%
15	Safe indoor spaces during unhealthy weather/air	21	21.9%
16	Health and wellness programs	19	19.8%
17	Reduced truck traffic in residential areas	18	18.8%
18	Youth jobs and internships	18	18.8%
19	Healthy-housing inspections and repair assistance	17	17.7%

Respondents could select up to seven solutions. Percentages therefore do not sum to 100%.

Appendix B. Source record

- Fresh Air Vallejo Environmental Justice Survey responses — 96 English-language and one Spanish-language response.
- Anonymous written comments during meetings, facilitator notes, and group discussions from community-engagement meetings held between October 2025 and July 2026.
- Updated neighborhood assignments, survey findings, participant demographics.

Analysis prepared July 19, 2026. Fresh Air Vallejo / EJ4Vallejo community-engagement findings.