

CHAPTER 1: INTRODUCTION

PURPOSE OF THE HOUSING ELEMENT

Sacramento County's General Plan serves as a policy document to guide the development of the unincorporated area of the County. The Housing Element is one of eight mandatory elements of the General Plan.

The purpose of the Housing Element is to identify and analyze existing and projected housing needs for all income groups; to include goals, policies and programs to address the identified needs; and to provide enough sites for new housing development to occur during the 2021-2029 planning period.

HOUSING ELEMENT CONTENTS

The County's Housing Element consists of 11 individual chapters as listed below.

Chapter 1: Introduction: This chapter provides an overview of the purpose and contents of the Housing Element, including any subsequent amendments. This chapter also contains a description of the public outreach process, and an analysis of consistency with other planning documents.

Chapter 2: Financial Resources: This chapter identifies financial and other resources that are available to fund the construction of new affordable housing, encourage housing rehabilitation, assist first-time homebuyers, support revitalization of lower income neighborhoods, provide various other housing services to low- and moderate-income households, and support other housing element goals. This chapter also describes the roles of the Sacramento Housing and Redevelopment Agency as well as various County departments and offices in implementing the Housing Element.

Chapter 3: Housing Action Plan: Per Government Code Section 65583(c), housing elements must contain a program that sets forth a schedule of actions the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element.

Chapter 4: Evaluation of Prior Achievements: Per Government Code Section 65588, each local government must review the previous housing element to evaluate the effectiveness of the goals, objectives, policies, and programs; the progress in implementing the programs; and the appropriateness of goals, objectives, policies, and programs.

Chapter 5: Population, Employment and Housing Characteristics: Government Code Section 65583 (a)(1) requires the housing element to include an analysis of population and employment trends and Government Code Section 65583 (a)(2) requires the housing element to include an analysis of household characteristics.

Chapter 6: Housing Needs Assessment: Housing element law requires local governments to identify a plan to meet their existing and projected housing needs for households of all income levels. Income levels are based on household earnings as a percentage of area median income as follows: less than 50 percent includes extremely and very low-income households; less than 80 percent is low-income; 80 to 120 percent is moderate-income; and more than 120 percent is above moderate-income. Housing elements must also address groups with special housing needs such as farmworkers, large families and female-headed households, people experiencing homelessness, people with disabilities, including developmental disabilities.

Chapter 7: Constraints Analysis: The housing element must analyze governmental and nongovernmental constraints to the maintenance, improvement, or development of housing and must demonstrate efforts to remove the constraints. The requisite analysis for governmental constraints includes codes and enforcement, onsite or offsite improvement standards, constraints for people with disabilities, fees and exactions, land-use controls, processing and permitting procedures, and any other locally adopted ordinances that directly impact the cost and supply of residential development. The requisite analysis for

nongovernmental constraints includes land costs, construction costs, availability of financing, requests to develop housing at densities below that anticipated in the housing element, and the length of time between approval and submittal of application for building permits.

Chapter 8: Land Inventory: The Land Inventory Chapter includes a discussion of the Regional Housing Needs Assessment (RHNA), the methodology for the Vacant Land Inventory appendix, the housing development potential by income group, and the infrastructure and development constraints. This chapter also includes a discussion of the capacity of vacant land for emergency shelter development.

Chapter 9: Opportunity for Energy Conservation: Government Code Section 65583(a)(7) requires local governments to assess opportunities for energy conservation in residential development. The analysis could include planning and land-use, conservation incentives for the building industry and residents, as well as promoting green building and energy-efficient building standards and practices.

Chapter 10: Preservation of Housing Units: This chapter must include an inventory of at-risk units, assess the conversion risk, estimate and analyze the cost of replacement versus preservation for units at risk in the planning period, identify entities qualified to preserve at-risk units, and identify financing and subsidy resources.

Chapter 11: Assessment of Fair Housing: AB 686 (2018) requires housing elements to include an assessment of fair housing. This chapter acts as the assessment of fair housing and discusses the findings of Analysis of Impediments to Fair Housing Choice as well as the County's efforts to address systemic issues of racism and inequity.

Appendices: Appendix A provides several tables summarizing the feedback that the County received during public outreach. Appendix B is an evaluation of each program in the previous Housing Element that has provided insight in the development of new, updated programs. Appendix C is a parcel inventory of vacant and underutilized parcels in the unincorporated County that were used in summarizing the acreage and corresponding units available for residential development in Chapter 8. Appendix D provides maps of the location of the inventory of parcels. [Appendix E summarizes the completion of Program A1 including: background, statutory requirements, RHNA capacity tables, site-by-site analysis, infrastructure/utilities review, environmental constraints, AFFH outcomes, and outreach.](#)

2021-2029 MID-CYCLE HOUSING ELEMENT AMENDMENTS

State law requires jurisdictions, such as the County, to update Housing Elements every eight years (or five years for some jurisdictions). The intervening eight years is referred to as a "housing cycle." Though uncommon, a mid-cycle amendment to a Housing Element may be required. This only occurs when substantial changes in circumstances occur, necessitating an amendment to the element so that it remains accurate and effective. Potential reasons for a mid-cycle amendment include, but are not limited to, revisions to the RHNA, unforeseen population growth, changes in state law or regulations, and to ensure consistency with the General Plan should changes to other elements impacting Housing Element consistency occur during the housing cycle.

Below is a summary of all mid-cycle amendments for the 2021-2029 Housing Element.

AMENDMENT 1

This is a targeted mid-cycle amendment to update the Housing Element after approval and adoption of Program A1 by the Board of Supervisors on August 20, 2024. For background, after the California Department of Housing and Community Development (HCD) found the Housing Element in substantial compliance on May 9, 2022, the County began work on the Countywide Rezone Program (Program A1) to address the shortfall of available land to accommodate lower income units established by the RHNA. The goal of Program A1 was to rezone adequate and sufficient sites to accommodate the shortfall of lower income category units and provide sufficient buffer pursuant to State law and Housing Element objectives and goals by the statutory deadline of September 12, 2024. The Countywide Rezone Program included a robust analysis phase that vetted each candidate rezone site listed in the Housing Element against State requirements and HCD's best practices (i.e., size requirement, proximity to resources, ability to connect to

public water and sewer services, not overly constrained by natural resources or easements). During this phase, additional candidate rezone sites were identified and added to the program while some of the sites listed as candidate rezone sites in the Housing Element were removed from the program because they did not meet screening criteria (size requirements, infrastructure constraints, etc). Some property owners requested removal of sites from the program due to active entitlement applications for development or because the site was no longer vacant. Given these sites would not meet basic objectives or criteria of the program, they were rejected and no longer considered for rezoning.

On August 14, 2024, prior to the County's completion of the Countywide Rezone Program (Program A1), the County received a Letter of Inquiry from HCD on the status of completion of Program A1 by the statutory deadline of September 12, 2024. On August 23, 2024, the County provided HCD with a response indicating that the Board of Supervisors, through resolution and ordinances, approved rezones in support of completion of Program A1 on August 20, 2024. After review of all Program A1/Countywide Rezone documentation and subsequent meetings and correspondence with PER staff, HCD responded on January 24, 2025 with a Letter of Technical Assistance indicating that, "while the Countywide Rezone Program meets many requirements of state law, the rezone is dependent upon a total of 50 sites which were not identified in the housing element to accommodate the shortfall of lower-income units and were not analyzed to demonstrate that the sites are adequate to accommodate the regional housing need pursuant to Government Code section 65583.2." Staff responded to the findings of the technical assistance letter on February 21, 2025 (as requested), and provided additional documentation showing that the County did analyze the sites pursuant to state law. HCD and County staff met on June 30, 2025 at HCD's request to review HCD's findings. During the June 30, 2025 meeting and in correspondence recapping the meeting, HCD indicated that while it appears the analysis was completed in the documentation provided for the sites rezoned, the written sites analysis, required by State Law, along with an assessment of fair housing for the Countywide Rezone Program should be added and documented in the Housing Element. Additionally, HCD indicated that the land inventory tables in Appendix C should be updated to reflect the completion of Program A1.

Therefore, the purpose of targeted Amendment 1 is to update pertinent sections of the Housing Element with a written analysis of the adequacy of the candidate rezone sites that were rezoned to accommodate the lower-income unit shortfall and associated buffer pursuant to State law, update the inventory tables in Appendix C post-completion of Program A1, and to conduct an assessment of fair housing for the rezoned sites. For ease of reading, the County added a new Appendix to the Housing Element, Appendix E, to document the outcomes and analysis required post completion of the Countywide Rezone Program. Other applicable sections of the Housing Element were amended only to indicate where Appendix E provides additional information or clarifications.

Amendment 1, was approved and adopted by Resolution 2026-XXXX on XXX XX, 2026 by the Board of Supervisors.

PUBLIC PARTICIPATION

Cities and counties are required by State law (Section 65583[c][7] of the California Government Code) to "make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort."

Table 1 below summarizes the County's public outreach activities. Appendix A contains a more detailed list of comments and questions received during each outreach event, including the focus group meetings, community workshops and the Community Planning Advisory Committee (CPAC) presentations.

Table 1: Housing Element Outreach Strategy			
Outreach Method	Target Audience	Participation	Notes
Online Surveys posted on the County website – Survey 1 and Survey 2	County residents	Received 198 survey responses	Survey 1 was based on the Analysis of Impediments to Fair Housing Survey and was used to understand residents’ housing decisions and their housing experiences. This survey was available in English, Spanish, Russian, Vietnamese, Tagalog, and Chinese. Survey 2 was provided with the May 2020 Interactive Webinars. This survey was available in English and Spanish.
Focus Group Meetings	Service providers, community-based organizations and subject-matter experts	Hosted 7 focus group meetings with participation by 48 individuals from 19 organizations.	See Appendix A for a summary of comments received during the focus group meetings.
Informational Webinar	County Residents and Stakeholders	Webinar recordings have been viewed 24 times on the County’s YouTube page.	County recorded an informational webinar in April in English and Spanish. The recording and accessible presentation materials were posted to the County website.
Interactive Webinars	County Residents and Stakeholders	Residents within the Arden Arcade, Fair Oaks, Citrus Heights, and Rio Linda/Elverta communities. Participation by 6 attendees on May 13 and 6 on May 27, 2020.	County hosted two interactive webinars in May 2020. The presentations were available in English and Spanish.
Virtual Public Workshops	Countywide Residents and Stakeholders. Outreach efforts focused on low-income renters.	Attended by 54 participants on November 10 and 20 participants on November 12	County hosted two workshops for both English and Spanish speakers in November 2020. See Appendix A for a summary of questions, comments, and polling question responses.

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Outreach Method	Target Audience	Participation	Notes
Additional Meetings	Service Providers, Subject Matter Experts, Developers or Interested Groups	Met with individuals from five organizations	Additional meetings held upon request by other organizations:: - Disability Advisory Committee - Legal Services of North California - House Sacramento - Sacramento Housing Alliance - North State Building Industry Association
Community Planning Advisory Committees (CPAC)	County Residents	CPAC members and community members	County staff presented at all 14 CPAC meetings during October and November 2020 to provide CPAC members and the public an opportunity to review proposed Housing Element programs. See Appendix A for a list of comments and questions from CPAC members.
Public Review Draft Housing Element	County Residents, Stakeholders, Interested Groups	House Sacramento, Refugee Enrichment & Development Association, Sacramento Area Congregations Together, Legal Services of Northern California and Sacramento Housing Alliance all provided comments on the draft.	The Public Review Draft Housing Element was released for public review from February 1-22, 2021. The Executive Summary and Housing Action Plan Chapter were available in Spanish. County staff proactively notified all groups that participated in the Focus Group Meetings that the documents were available.
SHRA Commission	County Residents and Stakeholders	SHRA Commissioners	The SHRA Commission reviewed the draft Housing Element on February 3, 2021.
Planning Commission Workshop and Adoption Hearing	County Residents and Stakeholders	All five Planning Commissioners and two public members participated and commented during the workshop	The Planning Commission held a public workshop on the draft Housing Element programs on July 27, 2020. The Planning Commission made a formal recommendation to the Board on the Element on May 24, 2021.

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Outreach Method	Target Audience	Participation	Notes
Board of Supervisors Workshop and Adoption Hearing	County Residents and Stakeholders	Four out of five supervisors participated and commented during the workshop.	The Board of Supervisors held a public workshop on the proposed Housing Element programs and provided feedback on October 6, 2020. The Board of Supervisors held hearings to adopt the Element on July 27, 2021.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

As a recipient of federal housing funds, Sacramento County is required to assess barriers to fair housing choice through an Analysis of Impediments to Fair Housing Choice (AI). SHRA, acting as the Housing Authority for Sacramento County, partnered with other jurisdictions and housing authorities in the region and contracted with Root Policy Research to prepare a regional AI. The purpose of an AI is for public agencies to take meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination. Local governments may use the AI to meet AB 686 (2018) requirements to include an assessment of fair housing in their housing elements. As a part of their research for the AI, Root Policy conducted extensive community engagement efforts, described below. The findings of the AI are discussed in more detail in the Assessment of Fair Housing chapter of this element.

The community engagement process for the Sacramento Valley AI included focus groups with residents and stakeholders, “pop up” engagement at local events, and a resident survey. Stakeholder focus groups were supplemented with in-depth interviews as needed and as opportunities arose.

In partnership with the participating jurisdictions and nonprofit organizations throughout the region, the project team facilitated six resident focus groups and six stakeholder focus groups. The 80 resident focus group participants included:

- African American mothers hosted by Her Health First (city of Sacramento, Sacramento County);
- African American and Hispanic residents hosted by Sacramento Self-Help Housing (City of Sacramento, Sacramento County);
- Low income families with children hosted by the Folsom Cordova Community Partnership/Family Resource Center (Sacramento County);
- Residents with disabilities hosted by Advocates for Mentally Ill Housing (Rocklin, Roseville);
- Residents with disabilities hosted by Resources for Independent Living (City of Sacramento); and
- Transgender residents hosted by the Gender Health Center (City of Sacramento, Sacramento County).

Stakeholder focus groups included 35 participants representing organizations operating throughout the region. For the purpose of the AI, “stakeholders” include people who work in the fields of housing, real estate and development, supportive services, fair housing advocacy, education, transportation, economic equity, and economic development. Individuals living in the region are referred to as “residents” in the AI to highlight their stories and experiences.

A total of 577 regional residents participated in engagement activities at local events. Sacramento County event locations included ACC Senior Services, Del Paso Heights Library, Mack Road Valley Hi Community Center, and Meals on Wheels congregant meal locations. A resident survey was available in Chinese, Korean, Russian, Spanish, and Vietnamese both online and accessible to participants using assistive devices (e.g., screen readers), and in a postage-paid paper mail-back format. A total of 224 Sacramento County residents participated in the resident survey. In order to facilitate additional feedback, the County released a housing element survey based on the AI resident survey and collected 187 additional responses.

FOCUS GROUP MEETINGS

From May 2020 through June 2020, the County conducted a series of focus group meetings with key stakeholders that either provide services to special needs populations or are actively engaged and/or knowledgeable regarding housing issues. The focus group meetings covered the following topics: Housing for People with Disabilities; Housing Goals, Policies, and Programs; Barriers to Housing and Services for People Experiencing Homelessness; Housing for Farmworkers; and, Housing for Seniors. During the focus group meetings, the stakeholders provided the County with a description of housing challenges for special needs groups, new program ideas, and additional data sources.

In October 2020, the County hosted two additional focus group meetings; one meeting to review Housing for the Refugee and Immigrant Community and another to report back to stakeholders on draft Goals, Policies, and Programs.

In addition to the focus group meetings, County staff met independently with other organizations including the Disability Advisory Committee, North State Building Industry Association (BIA), Sacramento Housing Alliance, Legal Services of Northern California and House Sacramento.

Some of the organizations that participated in the focus group meetings include:

- Sacramento Housing Alliance
- California Coalition for Rural Housing
- Sacramento County Adult and Aging Commission
- Legal Services of Northern California
- California Health Collaborative
- Resources for Independent Living Sacramento
- Sacramento County Disability Advisory Commission
- House Sacramento
- Sacramento Self-Help Housing, Inc.
- Turning Point Community Programs
- Hope Cooperative
- Jamboree Housing
- Consumer Self Help Center
- First Step Communities
- La Familia Counseling Center
- NorCal Resist
- California Immigrant Policy Center
- International Rescue Committee
- Sacramento Area Congregations Together

WEBINARS AND WORKSHOPS

In response to COVID-19 and the shelter-in-place orders, the County transitioned all in-person workshops with members of the public to webinars and virtual workshops. The County conducted three webinars for members of the public in May 2020 using an online platform with one for informational/background purposes and two interactive webinars. The informational webinar was recorded in English and Spanish and posted to the Housing Element webpage. During the interactive webinars, members of the public were asked about what they like about housing in their community, what housing challenges they have faced in their community, and what the County could do to meet the housing needs of their community. Despite a large number of people registered for these events, attendance at these two webinars was low. In order to get additional feedback, County staff added a recording of the interactive webinar to the website as well as a survey to allow for additional input from members of the public.

The County made several changes to the outreach strategy during the second phase of community workshops in November 2020 to ensure more participation. The County switched from the previous online platform to Zoom, which emerged as the most popular meeting platform during the COVID-19 pandemic. The change to Zoom made providing live Spanish interpretation easier during the workshops. The County also hosted gift card giveaways during both of the November 2020 workshops to encourage attendance. The County advertised these workshops through NextDoor, Facebook, the Housing Element listserv and website, and in partnership with Community Based Organizations and SHRA. These changes to the outreach strategy resulted in increased attendance; there were 54 attendees at the November 10, 2020 workshop and 22 attendees at the November 12, 2020 workshop. The County posted a recording of the workshops and a survey with the workshop polling questions. The workshops included an education component to cover Housing Element basics, an interactive component using polling questions to get feedback on proposed programs, and opportunities for questions and answers.

All public outreach materials were made available in English and Spanish, including all email notifications. The County also provided screen reader friendly versions of each of the presentations on the Housing Element website.

GENERAL COMMENTS RECEIVED

Table 2 summarizes general comments received during the outreach activities and how the comments were incorporated into the Housing Element. Appendix A contains a more detailed list of responses to comments and questions received during outreach activities.

Table 2: Comments Received and Addressed		
General Comment	Source	Comment Response
Increase Housing Trust Fund (non-residential) fees; reevaluate the Affordable Housing Ordinance fee-only program (residential)	Goals Policies and Programs Focus Group Meeting	County is preparing Nexus Study to update the Housing Trust Fund fees concurrent with preparation of the Housing Element. County staff prepared program E3, which requires an evaluation of the Affordable Housing Ordinance.
Evaluation of the Affordable Housing Ordinance should happen sooner than 2023.	Virtual Public Workshops	Due to staffing resources and budget uncertainty, County staff selected a completion date of 2023. However, the County will evaluate sooner if priorities allow.
Limited affordable and accessible housing stock; incentivize development of additional accessible	Housing for People with Disabilities and Housing for Seniors Focus Group	County staff created programs D1 and D2 in direct response to this comment.

Table 2: Comments Received and Addressed		
General Comment	Source	Comment Response
units; develop a system to share new accessible units that are built with stakeholders.	Meetings and Disability Advisory Committee	
Nimbyism and xenophobia are barriers to housing and services for people experiencing homelessness; broader community education effort is needed to help the public to accept different types of housing.	Housing and Services for People Experiencing Homelessness Focus Group Meeting	County staff created program B5 in direct response to this comment.
Permit tiny homes and alternative housing types.	Housing and Services for People Experiencing Homelessness Focus Group Meeting	County staff created program D10 in direct response to this comment.
Barriers to housing for refugees and immigrants include rental requirements (security deposit, income requirements), lack of units with three or more bedrooms, lack of understanding of the system, lack of language accessibility, substandard housing conditions and fear of retaliation.	Immigrant and Refugee Community Focus Group Meeting	Addressed by programs G3, G4, G6 and E4. County staff created program G6 in direct response to this comment.
Tenant protections are needed soon due to coronavirus pandemic.	Virtual Public Workshops	The target date for program G5, Tenant Protections, is December 2024. However, County staff recognizes the immediacy of the need for tenant protections due to the coronavirus pandemic. If timing and funding becomes available, this work may commence sooner.
County should review Napa and Sonoma County codes related to farmworker housing.	Delta CMAC Meeting	County staff reviewed the Napa County and Sonoma County zoning codes and met with Sonoma County staff to discuss farmworker housing. County staff created program D6 in direct response to this comment.
Make data available to increase transparency about the impact of the Rental Housing Inspection Program.	Meeting with Sacramento Housing Alliance	County staff revised program C7 in direct response to this comment.
Be more specific in the language of program B8. Missing Middle Housing (or Naturally Occurring Affordable Housing)	Comment letter from Legal Services of Northern California	County staff revised program B8 to specify that the County will consider amendments to the Zoning Code to allow missing

Table 2: Comments Received and Addressed		
General Comment	Source	Comment Response
	(LSNC) and Sacramento Housing Alliance (SHA)	middle housing in single family zoning districts.
Identify program B8 as a key component of Housing Element Goal 7 because it will more housing types in existing single family-only neighborhoods.	Comment letter from House Sacramento	County staff revised the introduction to Goal HE 7 in the Housing Action Plan Chapter in direct response to this comment.
Develop programs that address the needs of large families and female-headed households.	Comment letter from LSNC and SHA	County staff added references to programs that will benefit Large Households and Female-Headed Households to the Housing Needs Assessment Chapter.
Require 10 percent of all new affordable rental communities to be set aside for people experiencing homelessness.	Comment letter from LSNC and SHA	County staff created program D14 in direct response to this comment.
The 48 months that refugee families receive cash aid for is not adequate. They need programs to help them secure housing beyond the 48-month period.	Comment letter from Refugee Enrichment and Redevelopment Associations	County staff added information about the Refugee Cash Assistance program and the CalWORKS program. County staff also included information about when the 48-month period of eligibility for the CalWORKS program will increase.

Table 3 below describes ongoing efforts to engage the public and stakeholders in the implementation of the housing element after its adoption.

Table 3: Ongoing Engagement Efforts		
Description of Effort	Frequency	Audience
Annual progress reports to track implementation of programs	Annually	Board of Supervisors and the public
Meetings with BIA	Monthly	Market-rate housing Developers
Meetings with affordable housing developers	Twice per planning period: June 2023 and June 2027	Affordable housing developers
Renters Helpline Meetings	Quarterly	Funding partners and service providers

GENERAL PLAN CONSISTENCY

State Housing Element law (Government Code Section 65583(c)(7)) requires the identification of “means by which consistency will be achieved with other general plan elements and community goals”. The County conducted the following analysis to ensure that the Housing Element is consistent with other General Plan elements. The County will continue to review and revise the Housing Element, as necessary for consistency, when amendments are made to other elements of the General Plan.

- Environmental Justice Element:** The Safe and Sanitary Homes section of the Environmental Justice Element includes Policy EJ-31 and several implementation measures that require the County to analyze the presence of overcrowding in EJ Communities and the causes of that overcrowding and collaborate with refugee and immigrant advocates as a part of the Housing Element. To address this policy, the County hosted a focus group meeting with service providers for the refugee and immigrant community in Sacramento County. A discussion of this meeting as well as an analysis on housing overcrowding is included in the Housing Needs Assessment Chapter of this element. There is some tension between policy EJ-32, which calls for the provision of affordable housing in EJ Communities, and policy HE 7.1.3, which calls for the provision of affordable housing in areas of opportunity. Since adoption of the EJ Element, the County became aware of a growing body of research that suggests that affordable housing be provided in opportunity areas or areas with access to resources like employment centers and high performing schools. However, other keystone EJ Element policies (such as EJ-1) are intended to address historic inequities and divestment by prioritizing EJ Communities for infrastructure and amenities, with the ultimate goal of transforming EJ Communities into areas of opportunity. This complements policy HE 7.1.3 and is consistent with the Housing Element’s goal to promote and affirmatively further fair housing opportunities for County residents.

Many programs use Environmental Justice Communities as geographic areas of focus. The EJ Element’s geographic focus of analysis and policies is Environmental Justice Communities (EJ Communities) - areas that are considered disadvantaged compared to other parts of the unincorporated County. Staff used two sources to determine the extent and boundaries of Environmental Justice Communities. One source is the California Communities Environmental Health Screening Tool (more commonly known as CalEnviroScreen). The other source staff used to identify Environmental Justice Communities is the Sacramento Area Council of Governments’ (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). State law requires SACOG to conduct an environmental justice and Title VI analysis as part of the MTP\SCS to determine whether the MTP/SCS equitably benefits low-income and minority communities (Sacramento Area Council of Governments, 181). SACOG refers to these areas as Low Income High Minority (LIHM) Areas.

Staff combined CalEPA’s disadvantaged communities with SACOG’s LIHM areas to delineate Environmental Justice Communities. There are four EJ Communities: North Highlands/Foothill Farms, North Vineyard, South Sacramento and West Arden-Arcade. The North Highlands/Foothill Farms EJ Community includes Old Foothill Farms. These Environmental Justice Communities include Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) and TCAC areas of High Segregation and Poverty.

- Land Use Element:** The projected residential development evaluated in the Land Inventory chapter of this element is consistent with General Plan policies regarding the Urban Policy Area and the Urban Service Boundary.
- Open Space and Agricultural Elements:** To maintain consistency with the Open Space and Agriculture Elements, the County did not include lands designated for open space or agriculture in the inventory (except lands zoned for agricultural/residential use). There are no sites identified in the County’s inventory for residential development that conflict with open space, conservation, or agricultural policies of the General Plan. For this reason, the Housing Element is consistent with the Open Space and Agricultural Elements.

- **Safety Element:** State law requires that the safety element be reviewed and revised as necessary to address climate adaption and resiliency strategies and flood and fire hazards upon each revision of the housing element or local hazard mitigation plan (LHMP). The County is currently updating the LHMP and anticipates adopting the updates in 2022. At the time of LHMP adoption, the County will update the Safety Element to summarize and incorporate the LHMP by reference consistent with state law.

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