

Exhibit D

Environmental Social Justice Memo



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MEMO

TO: Andrea Echeverria, P.E., Senior Civil Engineer, Capital Project Management, OC Construction, Orange County Public Works

FROM: Ravi Shah, P.E.

DATE: July 3, 2025

SUBJECT: OC Loop Segments O, P, Q Coyote Creek Bikeway Project Conformity with California Public Utilities Commission's Environmental and Social Justice Action Plan

Background Information

The California Public Utilities Commission (CPUC) Environmental and Social Justice (ESJ) Action Plan 1.0 established a definition of "Environmental and Social Justice (ESJ) communities" for the purposes of CPUC policy and programs, as predominantly communities of color or low-income communities that are underrepresented in the policy setting or decision-making process, subject to a disproportionate impact from one or more environmental hazards, and are likely to experience disparate implementation of environmental regulations and socioeconomic investments in their communities. Version 2.0 of the ESJ Action Plan does not propose a revised definition of "ESJ communities".

The ESJ action plan consists of nine main goals to ensure that ESJ communities participate in the CPUC decision-making process and that all developments in clean energy, transportation and communication services benefit all communities, as follows:

1. Consistently integrate equity and access considerations throughout CPUC regulatory activities.
2. Increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health.
3. Improve access to high-quality water, communications, and transportation services for ESJ communities.
4. Increase climate resiliency in ESJ communities.
5. Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC's decision-making process and benefit from CPUC programs.
6. Enhance enforcement to ensure safety and consumer protection for all, especially for ESJ communities.
7. Promote high road career paths and economic opportunity for residents of ESJ communities.
8. Improve training and staff development related to ESJ issues within the CPUC's jurisdiction.
9. Monitor the CPUC's environmental and social justice efforts to evaluate how they are achieving their objectives.

OC Loop Segments O, P, Q Coyote Creek Bikeway Project

The County of Orange, as the lead agency under the provisions of the California Environmental Quality Act (CEQA), prepared the Initial Study / Mitigated Negative Declaration (IS/MND) for the OC Loop Segments O, P, and Q Coyote Creek Bikeway Project. The County of Orange Board of Supervisors approved the IS/MND on October 19, 2021 and the Notice of Determination was filed on October 20, 2021 (State Clearinghouse No. 2020110244).

Caltrans was the lead agency under the National Environmental Policy Act (NEPA). Caltrans determined that the project is a Categorical Exclusion under 23 CFR 771.117(c): activity (c)(3). The Categorical Exclusion Determination Form was signed on February 25, 2021.

In addition, the project is consistent with the CPUC ESJ's nine main goals, as follows:

1. *Consistently integrate equity and access considerations throughout CPUC regulatory activities.*

Three census tracts (6059110500, 6059110606, 6037503902) adjacent to the Project alignment are categorized as disadvantaged communities (DACs) based on their CalEnviroScreen designation. In addition, two Transportation Analysis Zones (TAZs) are identified by the Southern California Association of Governments (SCAG) as Environmental Justice Areas (EJ Areas). These two areas are located adjacent to Coyote Creek from Knott Avenue to La Mirada Boulevard. EJ Area TAZs were identified if they had a higher concentration of minority populations or households in poverty than is seen in the greater SCAG region. Residents from these communities will have access to the bikeway at Valley View Avenue, Artesia Blvd, Trojan Way, Knott Avenue, and Stage Road.

Outreach and public participation opportunities are discussed as part of goal number 5 below.

2. *Increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health.*

Located within the South Coast Air Basin—an area in nonattainment for multiple criteria pollutants under SCAQMD jurisdiction—the Project aligns with the 2016 Air Quality Management Plan (AQMP) and regional sustainability goals. Air quality analysis confirms that both construction and operational emissions are below SCAQMD thresholds, and greenhouse gas (GHG) emissions during the Project's lifetime are below CEQA significance levels.

By closing a critical 2.7-mile gap in the OC Loop, the project supports mode shift from personal vehicles to active transportation. This is expected to reduce vehicle miles traveled (VMT), decrease tailpipe emissions, and improve air quality. In addition, the proposed ADA-compliant bikeway encourages healthier lifestyles through increased physical activity, which can further reduce public health burdens. Operationally, the bikeway is a non-motorized facility that introduces no new long-term emission sources aside from minor maintenance activity.

The Project alignment is located such that residents within ESJ's will have access at Valley View Avenue, Artesia Boulevard, Trojan Way, Knott Avenue, and Stage Road to walk or ride onto the trail.

3. *Improve access to high-quality water, communications, and transportation services for ESJ communities.*

Closing the 2.7 mile gap will be a significant milestone in the completion of the OC Loop, which will provide access to parks, beaches, schools, and shopping areas in Orange County using active transportation. Notably, the OC Loop bikeway connects to multiple bus stops and transit stations. DAC members who rely on alternative modes of transportation will more easily commute via walking or biking to employment centers once this Project is constructed.

Through outreach efforts, the community requested off-street multiuse facilities for recreation and commuting. The Project will be constructed along the Coyote Creek Channel which will separate active transportation users from vehicles. In addition, two bridges and one underpass will be installed at railroad crossings to separate users from the railroad tracks. The installation of these grade-separated crossings will increase user comfort with cycling and walking.

4. *Increase climate resiliency in ESJ communities.*

The Project advances climate resiliency for ESJ communities by promoting active transportation, reducing vehicle miles traveled (VMT), and supporting regional goals aimed at reducing greenhouse gas emissions and improving air quality. This emissions reduction is especially important in disadvantaged communities, which often experience cumulative impacts from transportation corridors.

5. *Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC's decision-making process and benefit from CPUC programs.*

Outreach for the Project began as early as 2006, with public workshops held in Buena Park (October 25, 2006), Irvine (November 21, 2006), La Habra (February 21, 2007), Orange (March 19, 2007), Cerritos (March 21, 2007) for the development of the 2008 Coyote Creek Trail Master Plan. Support for grade-separated crossings was shared by the community at these outreach events. Outreach efforts in 2011 showed similar support for grade-separated crossings.

Outreach continued in 2014 during the OC Loop Gap Closure Feasibility Study, including a stakeholder workshop hosted by OCTA that brought together over 30 participants from agencies such as Caltrans, Gateway Cities COG, and the Cities of Buena Park and La Mirada.

In July 2018, OC Public Works conducted a survey mailed to approximately 200 residences in the Project area and distributed via social media and email. The results reflected strong community interest for improving the active transportation network via the gap closure.

As in-person meetings became restricted during the COVID-19 pandemic, the County pivoted to online engagement. A SurveyMonkey public participation survey was launched in July 2020, with 54

residents responding by September. Notably, 93% of respondents said they would bike or walk more if safer paths were provided, and 88% of respondents noted that an improved bicycling/walking network is important to them. Respondents provided detailed comments supporting a class I bikeway.

In 2022, two in-person tabling events were held at Bellis Park (May 21, 2022), located in a DAC, and Ralph Clark Park (June 5, 2022), alongside a virtual public meeting on June 2, 2022.

The project website (<https://ocip.ocpublicworks.com/ocloop-opq>), which can be translated to multiple languages, continues to host meeting materials, video presentations, and project updates ensuring ongoing access for community members. Through a combination of multilingual, in-person, and online outreach the project has engaged ESJ communities.

6. Enhance enforcement to ensure safety and consumer protection for all, especially for ESJ communities.

Stress levels near the existing gap in the OC Loop are considered high due to the presence of high vehicle volumes and speeds without dedicated bicycle facilities. The Project will provide a class I bikeway separated from vehicular traffic, reducing potential vehicle-pedestrian and vehicle-bicycle conflicts. The Project incorporates physical safety measures such as new fencing, grade-separated crossings at railroad tracks and improved at-grade crossings. The grade-separated crossings at railroad tracks exceed the clearances required by General Order 26-D. These improvements will enhance safety and protection for residents of ESJ communities using the bikeway.

7. Promote high road career paths and economic opportunity for residents of ESJ communities.

Based on the US Census Bureau's OnTheMap tool, the areas adjacent to the project alignment have a high concentration of manufacturing, retail trade, wholesale trade, transportation and warehousing jobs. Furthermore, by closing the gap in the OC Loop, the community will have access to employment hubs in adjacent cities. The proposed Class I bikeway will offer an ADA-compliant alternative for accessing work, supported by nearby bus stops and transit stations. These improvements reduce transportation barriers for the ESJ community.

As a publicly funded capital project, construction will follow prevailing wage laws and may create short-term job opportunities for skilled labor during the 18 to 24 month buildout. These investments provide both immediate and long-term economic benefits to local communities.

8. Improve training and staff development related to environmental and social justice issues within the CPUC's jurisdiction.

The applicant defers this CPUC goal to CPUC staff.

9. Monitor the CPUC's environmental and social justice efforts to evaluate how they are achieving their objectives.

The applicant defers this CPUC goal to CPUC staff.

Conclusion

Given the evaluation above, the OC Loop Segments O, P, Q Coyote Creek Bikeway Project is consistent with the CPUC ESJ goals.