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Katherine Douglas

Public Comment

From: Lauren Partch <lpartch@environmentaldefensecenter.org>
Sent: Friday, March 6, 2026 11:21 AM
To: sbcob
Cc: Maggie Hall; Brooke Balthaser; Juan Lares
Subject: Comment Letter to Board of Supervisors re 3/10/26 BOS Hearing (Agenda Item No. 4)
Attachments: 2026_03_06 EDC et al. Comments re EJ Element (March 10 BOS Hearing).pdf

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Dear Clerk of the Board,

Please find attached our comment letter regarding the Santa Barbara County Environmental Justice Element, currently Item No. 4 on the Departmental Agenda for the Board of Supervisors hearing next Tuesday, March 10, 2026.

Thank you,
Lauren Partch



environmental
DEFENSE CENTER

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We recognize that EDC sits on occupied, unceded, stolen lands of the Chumash Peoples, on Shmuwich Territory, who have called this area home for time immemorial. We commit today to make space to elevate indigenous voices and support our local Chumash and indigenous communities in our work to protect our environment.

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March 6, 2026

Mr. Bob Nelson, Chair
 Santa Barbara County Board of Supervisors
 123 East Anapamu Street
 Santa Barbara, CA 93101

Sent via email to: sbcob@countyofsb.org

Re: Santa Barbara County’s Draft Environmental Justice Element

Dear Chair Nelson and Honorable Supervisors:

This letter is submitted by the Environmental Defense Center (EDC), Climate First: Replacing Oil & Gas (CFROG), Central Coast Climate Justice Network (C3JN), and the undersigned allied organizations working to advance environmental justice throughout Santa Barbara County.

As we expressed in our previous letters to the Planning Commission dated October 6, 2025, and November 3, 2025, Santa Barbara County (the “County”) should strengthen the draft Environmental Justice Element (“EJ Element”) before its adoption so that the EJ Element satisfies the purpose of Senate Bill 1000 (“SB 1000”). *See* Cal. Gov’t Code § 65302(h). Pursuant to SB 1000, an EJ Element’s purpose is to not only identify the unique or compounded health

risks in Santa Barbara County’s lower-income communities, but to also *reduce* these risks. The policies, objectives, and actions (collectively referred to herein as “policies”) in an EJ Element guide future community plans, policies, infrastructure priorities and facility improvement programs, as well as annual County budgets that work together with the General Plan to advance improvements in Environmental Justice Communities (“EJCs”) throughout the County. Since EJCs disproportionately face the dangers of pollution and other environmental hazards that threaten their health, well-being, and safety, the EJCs in Santa Barbara County deserve an EJ Element that is informed by community experiences and priorities and will improve their environmental conditions in a measurable and enforceable way.

As an initial matter, we once again urge the County to strengthen the EJ Element’s community outreach commitments, objectives, and actions prior to approving the EJ Element for integration into the County General Plan. Community input is critical to inform this process. Moreover, the draft EJ Element should be improved to ensure it satisfies SB 1000’s goal of reducing the disproportionate environmental harms in the County’s EJCs, and to be consistent with the California Department of Justice’s (“California DOJ”) interpretation of SB 1000 and guidance to California cities and counties in implementing SB 1000.¹ Specifically, the EJ element should provide quantitative timelines, contain targeted and binding language, and address all environmental harms facing EJCs, including water pollution. Finally, we urge the County to incorporate ongoing community input during the life of the EJ Element.

I. Background on SB 1000 and Environmental Justice

California enacted SB 1000 to help local governments counteract historical land use practices that have led to disadvantaged communities, particularly communities of color, bearing a disproportionate burden of pollution and environmental hazards.² To further this goal, SB 1000 mandates that every county develop an environmental justice element or related policies integrated into another element or comprehensive plan that identifies and describes disadvantaged communities within its jurisdiction. Cal. Gov’t Code § 65302(h)(1).

Each county must also identify policies to reduce pollution exposure, improve air quality, promote public facilities, increase food access, provide safe and sanitary homes, promote physical activity, promote civic engagement in the public decision-making process, and prioritize improvements and programs that address the needs of those disadvantaged communities. Cal. Gov’t Code § 65302(h)(1)(A–C).

California law defines environmental justice to include the “deterrence, reduction, and elimination of pollution burdens for populations and communities experiencing the adverse effects of that pollution,” “the provision of technical assistance to populations and communities most impacted by pollution,” and “at a minimum, the meaningful consideration of

¹ If County staff believe that existing policies, rules, and/or regulations adequately address any of the concerns outlined in this letter, we highly encourage the County to incorporate references to these policies in the EJ Element itself.

² See Office of the Attorney General, Environmental Justice in Local Land Use Planning, available at <https://oag.ca.gov/environment/sb1000>.

recommendations from communities most impacted by pollution into environmental and land use decisions.” Cal. Gov’t Code § 65040.12(e)(2).

To guide cities and counties in implementing the requirements of SB 1000, the California DOJ published “Best Practices for Implementing SB 1000.”³ In this document, the DOJ recommends certain methodologies for identifying EJCs, identifies certain characteristics that satisfactory EJ policies share, and provides examples of satisfactory EJ policies that California cities and counties have already adopted.⁴ Since SB 1000 was enacted, the DOJ has also monitored and enforced SB 1000 compliance, as evidenced by the Attorney General’s numerous comment letters and enforcement actions to and against over a dozen cities and counties.⁵

II. The County Should Gather Additional Community Input Through Surveys and In-Person Meetings on the Draft Environmental Justice Element Before Adopting the Element.

We recognize and appreciate all the work that Santa Barbara County has already done to gather input from EJC residents about the environmental needs of these specific communities. Community outreach work has already included working with the Promotores Network to conduct community surveys and hold community meetings in three of the eight EJCs. EJ Element Appendix C-Engagement Summary (“Appendix C”) at C-3, C-6. It is imperative, however, that the County continue its outreach work by continuing to survey EJC residents and hold in-person meetings that are accessible to residents in each of the eight EJCs.

To gather surveys from EJC residents, the Promotores Network “went door-to-door and attended community events” and “obtained a total of 293 surveys from community members within EJCs,” which the County characterizes as a “low response rate.” Appendix C at C-8, C-10. If the County is willing to revisit its survey efforts, recent community reports from the Cuyama Valley—the Cuyama Valley Community Action Plan, the Cuyama Futures Report, and the UCSB Water Census—have demonstrated that high survey response rates from rural communities are achievable by taking a variety of approaches. For example, to inform the Cuyama Action Plan, a bilingual community survey was made available both online and distributed in-print via USPS to all post office boxes in the Cuyama Valley, which yielded “143 responses representing 42% of estimated households and 42% of the estimated population living in the Cuyama Valley.”⁶ Similarly, organizations preparing the Cuyama Futures Report collected 133 survey responses after sending a survey “to every mailbox in the valley” and offering “[i]nclusivity funds in the form of \$50 VISA gift cards . . . for the first 100 respondents who

³ California DOJ, *Best Practices for Implementing SB 1000*, available at <https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf>.

⁴ *Id.* at 9-14, Appendix A.

⁵ California Attorney General, *Environmental Justice in Local Land Use Planning*, available at <https://oag.ca.gov/environment/sb1000>.

⁶ Blue Sky Center et al., *Cuyama Valley Community Action Plan* (2020), at 6, available at <https://www.blueskycenter.org/action-plan>.

requested them,” since “the survey took on average 35 minutes to complete.”⁷ The UCSB Water Census team conducted door-to-door household visits, left mail-in bilingual surveys at houses, and offered a 10-dollar gift card to all residents who agreed to take the survey, which yielded a total of 315 survey responses from the Cuyama Valley.⁸ We encourage the County to consider conducting further door-to-door outreach, send surveys to post office boxes, and use existing grants to fund monetary incentives for survey takers.⁹

In addition, the County and the Promotores Network jointly held bilingual in-person meetings in only three of the eight EJCs: New Cuyama, Los Alamos, and Isla Vista. Appendix C at C-19–C-21. It is unclear why the County only chose to hold in-person meetings in these locations and we urge the County to additionally hold in-person meetings that are reasonably accessible to residents in the other five EJCs. If the County is open to holding additional in-person meetings in the remaining EJCs, this would also be an excellent opportunity for the County to seek feedback on the Draft Proposed Program, which the County has yet to seek direct feedback on from EJC residents. *See, generally*, EJ Element.

Finally, we suggest that the County explicitly consider demographic data such as race, language isolation, and employment patterns (for example, the presence of farm worker populations) in these low-income communities as part of the community outreach process. Many working-class and farmworker community members with language barriers face both disproportionate environmental burdens and systemic barriers to participation in County hearings. Outreach efforts to EJCs should diversify engagement tactics beyond traditional hearings to include culturally and linguistically appropriate methods, such as Spanish, Mixtec, Chinese, and other Indigenous language interpretation, as well as community-based meetings at times accessible to residents who work long or irregular hours. Because Indigenous language communities are a significant population in the county, particularly among farmworker communities, it is critical that the County utilize verbal outreach in addition to written materials since languages like Mixtec are primarily spoken. This approach will help ensure that participation opportunities are truly inclusive.

III. The EJ Element’s Policies Should Be Strengthened to Satisfy SB 1000’s Purpose of Reducing Environmental Health Risks in EJCs.

SB 1000 requires the County to develop policies that “*reduce* the unique or compounded health risks experienced by disadvantaged communities.” Cal. Gov’t Code § 65302(h)(1)(A) (emphasis added). To ensure that policies in fact reduce such health risks, the California DOJ

⁷ Quail Springs & Blue Sky Center in partnership with the Uplift Central Coast Coalition’s California Jobs First Initiative, Cuyama Futures (2024), at 17-18, available at https://static1.squarespace.com/static/5a297d3dfe54eff9efa967c0/t/66d0a0488c6fee7403da0300/1724948563973/Cuyama+Futures_English_compressed+-+for+public.pdf.

⁸ UCSB et al., Cuyama Water Census (2018), at 8-11, available at <https://static1.squarespace.com/static/5a297d3dfe54eff9efa967c0/t/5e5558268d74dd77702bad8f/1582651451770/UCSB+WATER+CENSUS+FINAL+REPORT+1-16.pdf>

⁹ The Transformative Climate Communities Grant has funding earmarked for the Environmental Justice Element community outreach and implementation.

states that policies “should be as concrete as possible and target the specific needs, health risks, and pollution exposures of the community to address this requirement.”¹⁰ The DOJ further recommends that each policy be worded to “ensure that the policy results in action.”¹¹ This is achieved when policies are binding, use mandatory language, contain trackable implementation measures, and are not “so vague as to be unenforceable.”^{12,13,14} To help ensure that policies are “clear and binding,” the DOJ clarifies that “local governments should use action-oriented language such as ‘implement,’ ‘develop,’ and ‘shall’ and avoid ambiguous language such as ‘promote,’ ‘encourage,’ ‘work towards,’ or ‘explore opportunities.’”¹⁵

None of the EJ Element’s objectives and actions fully comply with the California DOJ’s guidance for ensuring that they will reduce the significant environmental burdens experienced by Santa Barbara County’s EJs.

First, the EJ Element’s objectives and actions lack quantifiable timeframes for implementation. According to the California DOJ, EJ policies should include a “timeframe for implementation” and “ensure that community members are . . . able to *track performance*.”¹⁶ Likewise, the California Governor’s Office of Land Use and Climate Innovation (LCI), defines an objective as “a specified end, condition, or state that is an intermediate step toward attaining a goal,” that “should be achievable and, when possible, measurable and *time-specific*.”¹⁷ In Appendix A to the EJ Element, the actions to implement each objective are assigned one of three ambiguous timeframes: “short-term,” “mid-term,” or “long-term.” EJ Element: Appendix A – Implementation Matrix at A-1. These timeframes are not objectively “measurable and time-specific”¹⁸ so it is impossible for EJC residents or other interested community members to discern when the County intends to follow through with any action or objective. It is therefore also impossible for the public to hold the County accountable for complying with these timeframes. As detailed in our recommendations for amending and supplementing the EJ Element’s Implementation Matrix (attached hereto as Exhibit A), quantifiable, objective timeframes must be provided for all objectives and actions.

Second, the wording of most the County’s drafted objectives and actions fall short of the “best practices” standards that the California DOJ and Attorney General have published to help

¹⁰ *Id.* at 13.

¹¹ *Id.* at 13.

¹² Letter from California Attorney General to Fresno County (March 29, 2022) at 7, available at <https://oag.ca.gov/system/files/media/sb1000-letter-fresno-county.pdf>.

¹³ California DOJ, *Best Practices for Implementing SB 1000* at 13.

¹⁴ The LCI defines the environmental justice policies required by SB 1000 as “a specific statement that guides decision-making” and that “indicates a commitment of the local legislative body to a particular course of action.” LCI, General Plan Guidelines, Appendix E, at 382.

¹⁵ California DOJ, *Best Practices for Implementing SB 1000* at 14.

¹⁶ California DOJ, *Best Practices for Implementing SB 1000* at 14-15.

¹⁷ LCI, General Plan Guidelines, Appendix E, at 382 (emphasis added).

¹⁸ LCI, General Plan Guidelines, Appendix E, at 382.

California cities and counties comply with SB 1000.¹⁹ Below are examples of objectives and actions in the EJ Element that fall short of the DOJ’s “Best Practices.” Please see Exhibit A (attached) for specific recommendations for improving the EJ Element’s objectives and actions.

- Objective EJ 1.5: “Support collaboration with private and agency partners to enhance pedestrian amenities, such as lighting, shade, benches, trash and recycling receptacles, bathrooms, hand sanitizing stations, and water fountains in EJs.” EJ Element at 36. “Support collaboration with” and “enhance pedestrian amenities” lack specificity as to how this policy will be implemented.^{20,21} See also Objectives EJ 2.2 (“Expand partnerships with community-based organizations and EJ residents to amplify efforts of current programs”); EJ 3.3 (“Support and coordinate with local community organizations and volunteer groups in their efforts”); EJ 4.5 (“Support and promote ongoing community engagement and participation”); Action EJ 5.6 C. (“Supporting collaborative efforts”).
- Objective EJ 4.2: “Provide education and resources, including air quality information, to reduce wildfire smoke exposure for low-income EJ residents who cannot relocate and outdoor workers.” EJ Element at 42. “Education and resources” and “information” is too vague to indicate what impact, if any, this policy will have on EJ members’ exposure to wildfire smoke.²² See also Objectives EJ 6.2 (“Support education and awareness”); EJ 8.3 (“Provide resources”).
- Objective EJ 4.3: “Support grant funding and other initiatives to improve indoor and outdoor air quality and access to clean air within EJs.” EJ Element at 42. The California Attorney General regards EJ policies that “seek funding, absent clear and enforceable conditions or benchmarks” as less likely to meet SB 1000’s requirement of reducing pollution exposure.²³ See also Objectives EJ 1.3 (“Support funding and financing mechanisms”); EJ 4.4, (“collaboration to obtain grants”); EJ 5.4 (“Support incentives and

¹⁹ See *id.* at 2 (“This document outlines methodologies and tools for community engagement, ways to identify disadvantaged communities, and best practices in creating good environmental justice policies.”); see, e.g., Office of the Attorney General, Attorney General’s Comment Letters and Enforcement Actions, available at <https://oag.ca.gov/environment/sb1000>.

²⁰ Letter from California Attorney General to City of Santa Ana (October 16, 2020) at 5, available at <https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/sb1000-letter-santa-ana.pdf> (stating that policies such as “[c]ollaborate with environmental justice stakeholders in proposing solutions to remove hazardous lead soils in the city” lack “specific information about how community organizations and stakeholders will be identified, the timeline for implementation of these programs, and benchmarks that the City has set to ensure implementation,” making it “unclear how the community can be involved in the programs and track the effectiveness of these measures”).

²¹ Letter from the California Attorney General to San Bernardino County (August 15, 2019) at 6 (Policies “indicat[ing] the County will “advocate for and coordinate with local and regional agencies” will not actually “reduce the unique or compounded health risks.”).

²² See Letter from California Attorney General to Fresno County (March 29, 2022) at 7 (Vague policies that do not impose any specific restraint on County actions include the policies to ‘raise awareness about healthy eating habits and food choices’ and ‘ensure that residents of disadvantaged communities are provided the opportunity to participate in decisions that may have an adverse impact to their health.’”).

²³ Letter from the California Attorney General to San Bernardino County (August 15, 2019).

grants”); EJ 5.6 (“Support programs and projects”); Actions EJ 5.5 A. (“Seek funding”); EJ 5.6 C. (“Seek state and federal funding”).

- Action EJ 5.1 B.: “Amend the Land Use and Development Code (LUDC) if necessary based on the results of the community health needs assessment (EJ5.5) to avoid health impacts on EJCs from future industrial land uses.” EJ Element, Appendix A – Implementation Matrix, at A-10. Without further clarification, “if necessary” makes this policy “so vague as to be unenforceable.”²⁴ *See also* Objectives EJ 1.4 (“where feasible”); EJ 4.4 (“where possible.”); EJ 5.3 (“as necessary.”); EJ 7.3 (“When possible”); and Actions EJ 5.2 A (“if necessary”); EJ 5.3 B. (“if necessary”); EJ 5.6. C (“where practicable”); Actions EJ 4.1 A. (“if necessary”); EJ 5.5 A. (“if needed); EJ 5.6. C. (“where practicable”). The County should similarly clarify what “health impacts” must be avoided by any LUDC amendments.
- Action EJ 5.3 B. “Review the Zoning Code to identify opportunities to adjust buffers to protect sensitive land uses within EJCs, if necessary.” EJ Element: Appendix A – Implementation Matrix at A-10. “Identify opportunities” is ambiguous and vague language that makes a policy less likely to be “clear and binding.”²⁵ *See also* Objective EJ 1.1 (“[E]xplore additional uses of County property for EJCs.”).
- Objective EJ 5.3: “Minimize pesticide use near schools and other sensitive receptors by enforcing compliance with state regulations, as necessary.” EJ Element at 43. This policy does not define what is considered “near” a school.²⁶ *See also* Objectives EJ 5.1 (“in and around EJCs”); EJ 5.2 (“on or near sensitive land uses in and around EJCs”); EJ 5.3 (“adequately set back from”). Separately, the California Attorney General has stressed that EJ policies that “[r]equir[e] compliance with existing law do[] not meet SB 1000’s mandate.”²⁷ *See also* Actions EJ 5.3 A. (“Continue conducting pesticide use monitoring inspections and surveillance . . . to ensure pesticide applicators remain in compliance with state regulations.”).
- Objective EJ 5.6: “Support programs and projects to improve water quality and reduce the cost burden of water in the EJCs” EJ Element at 44. This policy fails to account for

²⁴ Letter from the California Attorney General to Stanislaus County (May 9, 2025) at 11-12 (finding that a policy to “[a]mend the County Code, if determined necessary, to comply with’ a requirement in Health and Safety Code section 17970.5 . . .” is too vague to be enforceable because it “provides the County with the option to take no action at all, if the County decides that amending its Code is not necessary to comply with existing law.”); *see also* Letter from California Attorney General to Fresno County (March 29, 2022) at 7.

²⁵ California DOJ, *Best Practices for Implementing SB 1000* at 14.

²⁶ Letter from California Attorney General to City of Santa Ana (October 16, 2020) at 6 (regarding a policy to “[a]void the development of sensitive receptors in close proximity to” certain land uses to be “of questionable efficacy” because the policy did not define “in close proximity”).

²⁷ Letter from California Attorney General to Fresno County (March 29, 2022) at 7 (finding that a policy “to require new projects to have bicycle racks” is an inadequate policy under SB 1000 because it merely enforces “an existing mandate in the State Green Building Code”).

the causes of poor water quality and cost burdens and fails to require that solutions to the underlying causes be implemented.²⁸

The above examples reveal that unless the County adds greater specificity to the objectives and actions and imposes new, binding commitments on the County, many of the EJ Element's policies may "do nothing to alter the status quo and do not satisfy SB 1000's demand that they reduce health risks, promote civic engagement, and prioritize improvements for disadvantaged communities."²⁹ Indeed, the objectives should contain more definite and specific commitments to be satisfactory "policies," which LCI defines as "specific statement[s] that guide[] decision-making" and that "indicate[] a *commitment of the local legislative body to a particular course of action*."³⁰

During the Planning Commission hearings about the EJ Element, Planning Commissioner Parke expressed concern that any objectives or actions in the EJ Element requiring the County to take specific action or imposing restraint on County decision-making could have unforeseen and undesirable consequences on the County's future planning decision-making abilities. For this reason, Commissioner Parke asked County staff to change Objective EJ 5.2, the only policy in the original version of the draft EJ Element that would have placed "specific restraint on County actions" as recommended by the California DOJ. As originally drafted, Objective EJ 5.2 required the County to "[d]isallow siting and construction of new large-scale hazardous waste facilities on or near sensitive land uses in and around EJCs." EJ Element at 43. This language placed mandatory restrictions on specific planning decisions that could cause future pollution exposure to already over-burdened EJCs. It also mirrored policies that other counties and cities in California have adopted as part of their SB 1000 compliance. *See, e.g.*, San Bernardino County Policy HZ 3.5 ("We do not permit new hazardous waste facilities to be developed in unincorporated environmental justice focus areas.").

The concern that binding policies might have unplanned consequences on future planning decisions is understandable, but can be addressed by inserting exemptions and defining key terms. In fact, the Planning Commission recognized the need to define key terms in the EJ Element during their November 5, 2025 hearing when the Commission recommended that the Board of Supervisors "[d]irect staff to develop an implementation plan for the Environmental Justice Element, *including adding definitions of key terms*" when it recommended approval of the EJ Element.³¹ We fully support this recommendation of defining key terms in the EJ

²⁸ *See* Letter from the California Attorney General to San Bernardino County (August 15, 2019) at 5-6 (stating that an EJ policy to "monitor pollution exposure and identify solutions" failed to "reduce the unique or compounded health risks experienced by disadvantaged communities" where it did not "require implementation of identified solutions to reduce pollution exposure, . . . define the type of pollution, how it is to be monitored, and the timeframe on which it should be monitored").

²⁹ Letter from the California Attorney General to Stanislaus County (May 9, 2025) at 12.

³⁰ LCI, General Plan Guidelines, Appendix E, at 382; *see also* Letter from the California Attorney General to Stanislaus County (May 9, 2025) at 12.

³¹ Revised Resolution regarding the Environmental Justice Element of the Comprehensive Plan (November 5, 2025), available at <https://cosantabarbara.app.box.com/s/q97rv82305oyfnbdjhcyxrrdhu3dgkqv/file/2037704332708>.

Element’s objectives and actions in tandem with adding mandatory language in order to create targeted, binding policies.

In addition to developing policies that will actually reduce the affected communities’ pollution exposure, the County should develop policies that reduce “*each* identified pollution source the communities are exposed to.”³² As part of reducing pollution sources, these policies must “prevent new sources of pollution.”³³ The EJ Element’s policies do not adequately address all of the environmental burdens that disproportionately burden all of the County’s EJCs.

Specifically, the EJ Element lacks adequate objectives and actions for reducing water pollution. The EJ Element identifies that seven of the eight EJCs—Cuyama, New Cuyama, Ventucopa, Garey, Sisquoc, Casmalia, and Los Alamos—all have CalEnviroScreen indicator scores ranging from 92% to 100% for “groundwater threats.”³⁴ EJ Element at 26. Similarly, four of the EJCs—Garey, Sisquoc, Casmalia, and Los Alamos—have CalEnviroScreen indicator scores ranging from 77% and 100% for “impaired waters.”³⁵ “Water pollution” was identified as among the “top three needs” in three EJCS—Cuyama, New Cuyama, and Casmalia. EJ Element at 28-29. Despite this awareness throughout the EJ Element that the County’s EJCs have some of the worst groundwater and surface water pollution in the state, the EJ Element does not contain any objectives that target groundwater and surface water pollution. *See* Cal. Gov’t Code § 65302(h)(1)(A). Only one policy, Objective EJ 5.6, mentions water quality, indicating that the County will “increase access to clean water (drinking and water quality) by “support[ing] programs and projects to improve water quality and reduce the cost burden of water in the EJCs.” Yet neither this objective nor its associated implementation actions prevent future pollution to EJCs’ groundwater or water bodies, leaving these discrete environmental hazards unaddressed. *See* EJ Element at 44; EJ Element: Appendix A - Implementation Matrix at A-11-12. We urge the County to add objectives designed to prevent future water pollution so that the EJ Element policies engage with the breadth of environmental issues faced by residents in the eight identified EJCs. **Please see Exhibit A for recommended objectives and actions to add to the EJ Element, which are all based on policies that other counties in California have adopted.**³⁶

³² California DOJ, *Best Practices for Implementing SB 1000* at 14 (“Policies should address each identified pollution source the communities are exposed to, including those related to water contamination, pesticides, hazardous waste, oil and gas facilities, and more. In addition, policies must be designed to reduce the communities’ pollution exposure.”).

³³ Letter from California Attorney General to Fresno County (March 29, 2022) at 7.

³⁴ “Groundwater threats” scores on CalEnviroScreen 4.0 reflect indicators of pollution in and near groundwater. Office of Environmental Health Hazard Assessment, *CalEnviroScreen 4.0 Report* at 113, available at <https://oehha.ca.gov/sites/default/files/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf#page=113>.

³⁵ “Impaired waters” scores on CalEnviroScreen 4.0 reflect the “[c]ontamination of California streams, rivers, lakes, and coastal waters by pollutants (which) can compromise the use of the water body for drinking, swimming, fishing, aquatic life protection, and other beneficial uses.” *Id.* at 134.

³⁶ California DOJ, Appendix A – SB 1000 Example Policies, available at <https://oag.ca.gov/system/files/media/sb-1000-appendix-a.xlsx>.

IV. Implementation, Accountability, and Ongoing Community Partnership

To ensure that the EJ Element results in measurable improvements for EJC, the County should also establish an ongoing Environmental Justice Oversight Committee or similar advisory body focused on implementation, accountability, and community partnership.

An oversight structure would help ensure that EJ policies are not only adopted, but effectively implemented and evaluated over time. Such a body could support the County by: (1) advising on culturally and linguistically appropriate community engagement strategies; (2) providing feedback on implementation progress and barriers; (3) reviewing data and metrics used to assess reductions in pollution exposure and health risks; and (4) supporting transparency and public accountability regarding EJ-related actions and outcomes.

Establishing an oversight committee is consistent with SB 1000's emphasis on meaningful community engagement and the incorporation of recommendations from communities most impacted by pollution into land use and environmental decision-making. An ongoing advisory structure would also help the County monitor cumulative impacts, adapt policies as conditions change, and ensure that EJ commitments translate into tangible benefits for identified communities. Importantly, an Environmental Justice Oversight Committee would not impede County decision-making authority, but would serve as a practical tool to strengthen implementation, improve outcomes, and build trust with EJC residents.

Membership on the Environmental Justice Oversight Committee should include EJC residents and community-based organizations, and where appropriate, the County may build upon or coordinate with existing advisory structures while ensuring that community voices remain central to implementation. The County should consider setting aside funding to reimburse EJC residents who participate as an acknowledgement of their time, contributions, and expertise on these issues.

V. Conclusion

The reasons and examples detailed above demonstrate why and how the EJ Element should be strengthened to satisfy SB 1000's purpose of reducing the environmental burdens that disproportionately impact the County's EJC. To assist the County, please refer to Exhibit A, attached, for recommendations on how the EJ Element's objectives and actions may be modified and supplemented pursuant to the California DOJ's guidance and to mirror EJ policies that other California counties have adopted.

Sincerely,

Tristan Partridge
350 Santa Barbara

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American GI Forum Education Foundation

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Lawanda Lyons-Pruitt
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Stephanie Boshers
Chapter Chair
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Exhibit A

Appendix A: Implementation Matrix for EJE Policies and Objectives

The Implementation Matrix is designed as the basis for the post-adoption and crucial implementation phase of the Environmental Justice Element (EJE). It is intended to be used as a transparent, guiding action list for the County to track progress and provide accountability. After adoption, the EJE matrix will be updated as needed by staff from each department and made available to the public.

In this appendix, each action item is assigned a timeframe (I, II, or III):

- I = Short-term timeframe
- II = Mid-term timeframe
- III = Long-term timeframe
-  = Existing actions

Commented [LP1]: Recommendation: Replace these terms with quantitative, measurable timeframes (Number of months/years) or specific deadlines to allow the public to track implementation of all actions.

Each action also identifies one or more departments responsible for implementation. The far-right column of the matrix includes a department/district abbreviation (DA) for each department or district that has some role in implementing that action either as a champion, leading the effort, or as a supporting partner. The Champion department(s) are indicated with a bold font abbreviation. The County department abbreviations are listed below.

Department/District Abbreviations (the Champion is shown in Bold): Agricultural Commissioner's Office = AC, Air Pollution Control District = APCD, Behavioral Wellness = BW, County Executive Office = CEO, County Health = CH, Community Services = CS, County Education Office = ED, County Fire Department = FD, First Five = FF, General Services = GS, Human Resources = HR, County Information and Technology Department = IT, Office of Emergency Management = OEM, Planning and Development = PD, Public Works = PW, County Sheriff's Office = SO, Social Services = SS.

Policy 1: Promote public facilities in EJCs.				
No.	Objective	Action	Timing	DA
EJ-1.1	Improve Access to Existing Facilities for EJCs. Conduct in-person meetings in all Environmental Justice Communities (EJCs) and/or distribute surveys in all EJCs by mail to collect community input regarding Work with Environmental Justice Community (EJC) members to understand barriers to	A. Continue to conduct needs assessments as funding is available to determine which public facilities are lacking, including Americans with Disabilities Act (ADA) compliance, or difficult to access in each EJC.	II 	CS, GS, PW

Policy 1: Promote public facilities in EJC.

No.	Objective	Action	Timing	DA
	accessing existing facilities and explore additional uses of County property for EJC.	<p>B. Explore the feasibility of converting County-owned vacant lots or underutilized public right-of-way into small parks, community gardens, or open spaces in EJC.</p> <p>Convert County-owned vacant lots or underutilized public rights-of-way into small parks, community gardens, or open spaces in EJC where feasible</p> <p>C. Bring County departments together to understand existing County-led efforts to use County-owned property as resources for the community. <u>Create a list of all said efforts and post it on the County's EJ Element webpage.</u></p> <p>D. Make facilities (e.g. Joseph Centeno Aquatics Center Cuyama Pool) low or no cost and remove barriers to these facilities. Facilitate access to County facilities. For example, expand hours of operation.</p>	<p>II</p> <p>I</p> <p>III</p>	<p>CS, GS, PD</p> <p>CS, GS, PW</p> <p>CS, PW</p>
EJ-1.2	Community Siting and Improvement Priorities. When considering new or improved public facilities within EJC, prioritize siting, provision of County services, infrastructure, and amenities based on community feedback (e.g., community centers, schools, parks, and open space, and emergency services, and improvements for transportation infrastructure, such as EV charging, road maintenance, bike, and pedestrian facilities, including ADA accessibility).	A. Conduct engagement to get feedback on recreational facilities from the community. Ensure consistent maintenance of existing recreational facilities. Prioritize identifying funding mechanisms, including grants and partners, for new recreational facilities (e.g., parks, open space, trails) in underserved EJC.	II	CS
EJ-1.3	Funding and Financing Mechanisms. Support funding and financing mechanisms to provide and enhance community-desired public facilities and services in EJC.	<p>A. Continue to research, advocate, and work with community members to apply for grant funding (state/federal) for public facilities and services within EJC.</p> <p>B. When identified, add EJ funding priorities to the County legislative platform, as appropriate.</p>	<p>II</p> <p>I</p>	<p>CS, PD</p> <p>CEO</p>

C. Form partnerships with special districts and community-based organizations that provide services and resources.

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CS

EJ-1.6	Improve Emergency Response. Work with EJCs to understand emergency response needs and improve emergency response services for EJCs.	<u>A.</u> Support the creation of resilience hubs that utilize renewable energy and backup energy systems, prioritizing frontline communities.	II 	CS, OEM
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Policy 1: Promote public facilities in EICs.

No.	Objective	Action	Timing	DA
		B. Continue to track the Mitigation Measures in the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan.	II 	AC, CEO, CH, CS, FD, GS, OEM, PD, PW, SO
		C. Continue to support long-term and year-round funding (general fund and grant opportunities) for warming and cooling centers in EICs.	III 	CEO, CS, OEM, SS
		D. Continue to strengthen partnerships between emergency services and clinics serving Isla Vista and Cuyama Valley (e.g. in Cuyama Valley, residents go to the fire station when the clinic is closed).	I 	BW, CH, FD, SO, SS
		E. Continue to increase drug overdose intervention training.	I 	BW, CH, FD, SO, SS
		F. Continue to provide information about Narcan vending machine(s) to address overdose problems in Isla Vista.	I 	BW, CH, SO
		G. Continue to deploy clean energy technologies to EICs during disaster response when available.	II 	CS, FD, OEM, PW

Policy 2: Promote access to healthy and affordable food in EJCs.

No.	Objective	Action	Timing	DA
EJ-2.1	Connect Local Farmers to EJCs. Support the expansion and the accessibility of farmers markets, mobile farmers markets, community-supported agriculture, and other direct farm-to-consumer models in EJCs to increase access to fresh, healthy, and affordable food, including fruits, vegetables, and other agricultural products.	A. Seek grant funding and other initiatives to increase farm-to-consumer opportunities in EJCs.	I	CH, CS, PD
		B. Continue to promote statewide efforts to expand usage of food assistance benefits (e.g., CalFresh, WIC, and Market Match) at farm-to-consumer sources to help increase the purchasing power of low-income residents.	III 	CH, SS
		C. Support farm-to-consumer businesses in EJCs, including streamlining permitting processes.	I	PD
		D. Support school districts and schools interested in gardens and farmers market programs.	III	ED
		E. Support increased access to local fresh food consistent with the Climate Action Plan (CAP).	III	CS
EJ-2.2	Diet-Related Illness Prevention and Education. Expand partnerships with community-based organizations and EJC residents to amplify efforts of current programs as well as develop additional programs and resources for prevention and education about diet-related illnesses in EJCs.	A. Continue to support and expand focused educational awareness campaigns to promote healthy eating habits and food choices.	II 	CH, ED, FF
		B. Continue to support opportunities to increase access to health and nutrition resources.	II 	CH, ED, FF
		C. Continue to enhance access to healthy foods, particularly in schools, to reduce rates of diabetes, obesity, and diet-related illnesses.	III 	CH, ED
		D. Continue to respect people's cultural backgrounds when promoting healthy eating and focusing on additive nutrition.	I 	CH, ED, FF
EJ-2.3	Everyone has the right to access affordable and nutritious food. Increase healthy food options	A. Continue to review funding options to waive or reduce permit and plan check fees for Microenterprise Home Kitchen Operations (MEHKOs) in EJCs.	I 	CH

Policy 2: Promote access to healthy and affordable food in EJC.

No.	Objective	Action	Timing	DA
	and relieve economic burdens for healthy food providers in EJCs.	B. Continue to partner with Santa Barbara Food Bank and other food providers to increase food provision services.	I 	CEO

Policy 3: Promote physical activity for community members residing within EJCs.

No.	Objective	Action	Timing	DA
EJ-3.1	Increase Culturally Relevant Opportunities for Physical Activity. Collaborate with community groups or partners that work with low-income members of EJCs to envision, design, implement, support, fund, and bring awareness to programs and projects that increase physical activity.	A. Continue to partner with community-based organizations to seek community involvement and feedback to create appropriate and relevant programming and to support improvements to natural and built environment designs to promote physical activity and recreation. For example, active transportation projects.	I 	CS, PD, PW
		B. Continue to promote culturally relevant education resources and affordable, low or no-cost programs that raise awareness about the importance of healthy lifestyle behaviors and healthy eating, and encourage residents to participate regularly in physical activity for the overall well-being of all ages. Collaborate with agencies who work with children up to 18.	II 	BW, CH, FF, SS
		C. Increase opportunities for cultural arts programs and events that promote movement, dancing, music, theater, and other types of visual and performative arts that increase physical activity and social cohesion.	I	CS
EJ-3.2	Increase Access to Parks. Partner with schools, places of worship, state and federal lands, and businesses to expand access to green spaces and recreation areas, especially in EJCs with less	A. Support activities and events where community members build relationships with green spaces and recreation areas (e.g., parks, open space, trails) to expand access within EJCs.	I	CS
		B. Increase education and outreach with community partners to increase access to parks in EJCs.	II	CS

Policy 3: Promote physical activity for community members residing within EJC.

No.	Objective	Action	Timing	DA
	accessibility to green spaces and recreation areas.	C. Increase access to affordable and nutritious food by supporting community gardens.	III	CS
EJ- 3.3	Increase Maintenance and Safety. Support and coordinate local community organizations and volunteer groups in their efforts to improve or maintain local parks, trails, and other public spaces in EJC. Address safety concerns that may create barriers to physical activity by assessing adequate lighting and street visibility in new and existing parks and recreation facilities.	A. Increase resources that provide respite from extreme heat (e.g., shade structures and plantings) in EJC.	III	CS, PW
		B. Increase maintenance on County-owned parks in EJC.	III	CS
		C. Continue to increase street lighting in EJC where appropriate.	III	PW

Policy 4: Improve air quality within EJC.

No.	Objective	Action	Timing	DA
EJ- 4.1	Point Source Emissions. Collaborate with Santa Barbara County Air Pollution Control District (APCD) to continue to identify and reduce point source emissions (Ozone, Particulate Matter (PM) 2.5, Diesel PM) in EJC in compliance with applicable existing standards and monitor the environmental and health impacts on populations in EJC to track progress and outcomes.	A. Continue to review and recommend updates to County regulations and/or requirements, based on health data, improved technology, and new rules and regulations if necessary to reduce pollution exposure and protect public health. Identify trends and patterns of non-compliance and make this information available to EJC if not already available.	II 	APCD, CH, PD
EJ- 4.2	Reduce Wildfire Smoke Exposure within EJC. Provide education and resources, including air quality information, to reduce wildfire smoke	A. Continue to coordinate distribution (when funding allows). Apply for funding to continue to coordinate distribution and awareness of air filtration devices, with a focus on underserved communities; and continue to provide awareness about air quality information and N-95 masks as a protection tool for agricultural	III 	AC, APCD, CH, FD, OEM

Policy 4: Improve air quality within EJCs.

No.	Objective	Action	Timing	DA
	exposure for low-income EJC residents who cannot relocate and outdoor workers.	workers and other outdoor workers when significant wildfire-induced air quality concerns exist. <u>B. Apply for and/or provide funding to provide N-95 masks to agricultural workers and other outdoor workers when significant wildfire-induced air quality concerns exist.</u> <u>C. B. Continue to provide education and resources for vegetation fuel reduction efforts (e.g., prescribed burns, prescribed herbivory, mechanical treatments, thinning and reduction with hand crews, etc.) that minimize wildland fire ignitions and the potential for large wildfires.</u>	I 	APCD, FD, OEM
EJ-4.3	Everyone Has a Right to Clean, Breathable Air. Support grant funding and other similar initiatives to improve indoor and outdoor air quality and access to clean air within EJCs.	<u>A. Apply for and/or administer grants for additional air quality monitoring for the residents of EJCs.</u> <u>B. Continue to pursue and administer CA Climate Investments and CALFIRE prevention grants to minimize wildland fire ignitions and the potential for large wildfires.</u> <u>C. Continue to pursue and administer grants to reduce mobile sources of emissions, such as medium and heavy-duty trucks and off-road vehicles.</u> <u>D. Continue to apply for grants that assist residents with getting indoor air filters.</u>	III   	APCD, CS, PD APCD, CS, FD, OEM CS APCD
EJ-	Industrial Business Operations and Practices.	<u>A. Continue to regulate and monitor industrial uses in proximity to</u>	II 	APCD,

<p>4.4 Collaborate with the industrial businesses within or adjacent to EJs to improve outdoor air quality through enhanced operations and other pollution reduction practices, including permit inspection, incentives, and collaboration to obtain grants, where possible.</p>	<p>EJCs including enforcement of the following code requirements found in LUDC 35.25.050.A:</p> <p><i>2a. M-1 zone. No offensive odors or fumes, noxious gases, or liquids, heat, glare, or radiation generated by or resulting from any use on any lot, other than motor vehicles or lighting fixtures, shall be detectable at any point along the property line of, or outside of the lot where the use is located.</i></p>		<p>PD</p>
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Policy 4: Improve air quality within EJC's.

No.	Objective	Action	Timing	DA
		<p>2b. M-2 zone. Any generation of offensive odors or fumes, noxious gases or liquids, heat, glare, or radiation, and all activities shall be conducted in such a manner so as not to be injurious to the health, safety, or welfare of persons residing or working in the neighborhood by reason of danger to life or property.</p> <p>3. Public health, safety and welfare - M-1, M-2 and M-RP zones. All activities shall be conducted in such a manner so as not to be injurious to the health, safety, or welfare of persons residing or working in the neighborhood by reason of danger to life or property.</p> <p>4. Smoke or dust - M-RP and M-1 zones. No smoke or dust shall be generated on a site by or resulting from any use, except for that associated with heating buildings, and motor vehicles.</p>		
		B. Continue to promote awareness within EJC's of APCD's permitted facilities map. Share with EJC members APCD's complaint response system for reporting air pollution complaints.	II 	APCD
EJ-4.5	<p>Community Engagement for Monitoring.</p> <p><u>Conduct, in partnership with local community groups, ongoing community engagement and participate in and incentivize air quality monitoring programs.</u></p> <p>Support and promote ongoing community engagement and participation in air quality monitoring programs and incentives.</p>	<p>A. Continue APCD air quality monitoring projects and community engagement projects, such as the Air Quality Index (AQI), Airpointer, PurpleAir low-cost sensor network, Annual Network Monitoring Plan, Clean Air Ambassador education program, Clean Air Rooms pilot program, and more.</p> <p>B. Continue to promote air quality alerts in EJC's.</p>	II 	APCD, CH
			II 	APCD, CH

Policy 4: Improve air quality within EJCs.

No.	Objective	Action	Timing	DA
		C. Continue to support the Department of Pesticide Regulation's maintenance of an Air Monitoring Network station in Santa Maria to monitor for pesticides in ambient air.	II 	AC

Policy 5: Reduce exposure to pollution within EJCs.

No.	Objective	Action	Timing	DA
EJ-5.1	Monitor and Enforce Industrial Land Uses in Proximity to EJCs. Monitor, evaluate, and take steps to address the immediate and long-term health and environmental impacts of industrial land use in and around EJCs.	A. Monitor existing industrial land uses to ensure they meet current health and safety mandates. B. Recommend amendments to the Land Use and Development Code (LUDC) if necessary based on the results of the community health needs assessment (EJ-5.5) to avoid health impacts to residents of EJCs from future industrial land uses. Population demographics (such as lower population numbers) cannot be used to justify industrial location siting in EJCs.	II III	APCD, PD PD
EJ-5.2	Prohibit New Toxic and Hazardous Waste Facilities. Prohibit siting and construction of new large-scale hazardous waste facilities on or near sensitive land uses in and around EJCs, with the exception of household hazardous waste collection centers. Limit New Toxic and Hazardous Waste Facilities. Limit siting and construction of new large-scale hazardous waste facilities on or near sensitive land uses in and around EJCs. Add new objective: Prohibit new non-residential uses that are known to release or emit toxic waste at levels that are harmful to human health.	A. Review the Zoning Codes and Hazardous Waste Element to identify opportunities to limit new Hazardous Waste Management Facilities (HWMF) within or adjacent to EJCs if necessary.	III	PD

Commented [LP4]: Copied from City of East Palo Alto policy HE-4.1

EJ-5.3 Conflicting Land Uses. Consistent with the Land Use Element, avoid land use conflicts by requiring that sensitive land uses are adequately set back from heavy industrial uses and other facilities that may pose a threat to human health. Minimize pesticide use near schools and other sensitive receptors by enforcing compliance with state regulations, as necessary. Prohibit pesticide use near schools and other sensitive receptors.	<u>A.</u> Continue conducting pesticide use monitoring inspections and surveillance around schools and other sensitive sites to ensure pesticide applicators remain in compliance with state regulations.	I	AC
	<u>B.</u> Review the Zoning Code to identify opportunities to recommend, where necessary, adjustments to setback requirements for new heavy industrial uses to protect sensitive land uses (e.g., schools and residences) within EICs.	III	PD

Policy 5: Reduce exposure to pollution within EJCs.

No.	Objective	Action	Timing	DA
EJ-5.4	Pollution Reduction Incentives. Support incentives and- <u>Apply for and/or fund grants</u> that reduce air quality emissions within or adjacent to EJCs.	A. Encourage and incentivize the replacement of old, high-polluting equipment with newer, cleaner equipment earlier than required by regulation or through normal attrition in order to reduce emissions that could have potential impacts on air quality.	III	APCD
EJ-5.5	Existing Sensitive Land Uses. Consistent with the Land Use Element, <u>adopt and enforce promote</u> —policies, programs, and incentives (such as buffers, monitoring requirements, permit inspection, etc.) to minimize health, noise, and environmental impacts from surrounding land uses on existing homes, schools, childcare, and eldercare facilities, parks and recreation, and healthcare facilities within EJCs.	A. Seek funding to complete a community health needs assessment for each EJC including surveys, data collection, and land use analysis. Recommend updates to regulations based on the results of the health needs assessment if needed to reduce exposure of people living within EJCs to pollution.	III	CH, PD
EJ-5.6	<p>Increase Access to Clean Water (Drinking and Water Quality). Everyone has the right to clean, affordable water. Everyone has the right to clean water. Apply for and/or provide funding for Support programs and projects to improve water quality and reduce the cost burden of water in the EJCs.</p> <p><u>Add new objective: In cooperation with service agencies, ensure that sources of potable water are protected from contamination.</u></p>	<p>A. <u>Develop green infrastructure standards that rely on natural processes for stormwater drainage, groundwater recharge, and flood management.</u></p> <p>B. Green Infrastructure Projects: Continue to support green infrastructure projects that rely on natural processes for stormwater drainage, groundwater recharge, and flood management when feasible.</p>	<p>II</p> 	CS, PW
		<p>B. Safe Drinking Water: <u>Codevelop with service agencies plans for updating dated water infrastructure and have contingency plans for when contamination occurs under unforeseen circumstances.</u></p> <p>Continue to support and coordinate with local and regional agencies to continue treatment efforts for contaminated water in affected EJCs to ensure safe drinking water</p>	<p>I</p> 	CH, PW

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supplies.		
<p>C. Water Restoration Funding Sources: Continue supporting collaborative efforts with water purveyors and other community partners. Seek state and federal funding that assists with water quality improvement and the reduction of contamination where practicable.</p> <p><u>D. Establish a countywide groundwater monitoring program that would include all or portions of unincorporated areas that use groundwater. Conduct periodic water level measuring and water quality sampling with regular reporting (at least annually) to the Board of Supervisors.</u></p> <p><u>E. Conduct annual inspections of farms or facilities that have a potential to spill hazardous materials into water supplies.</u></p>	<p>II</p> 	CH, PW

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Commented [LP9]: Copied from Sacramento County, HM-9-A

Policy 5: Reduce exposure to pollution within EJs.

No.	Objective	Action	Timing	DA
		D. Support opportunities to improve water quality and reduce water costs for residents of EJs. Collaborate with water purveyors and community service districts on creative, long-term solutions that improve water quality and reduce contamination.	II	PW
		E. Continue to provide education and support to communities for finding funding sources and actions that can be taken on a local level to improve water quality and water conservation efforts. Provide the public with water quality and water conservation education and information about things they can do themselves, such as rain gardens, safe disposal of harmful substances, integrated pest management, picking up litter in storm drains, etc. Prioritize rebates and programs that subsidize the cost for residents.	II 	PW

Policy 6: Reduce unique or compounded health risks within EJs.

No.	Objective	Action	Timing	DA
EJ-6.1	Prioritize the Needs of EJs. Should any Policies, Objectives, or Actions within the EJE appear to conflict with others within the County Comprehensive Plan, the needs of the EJs should be considered the priority. For current programs, projects, and planning documents, prioritize the needs of EJs when possible and, if not feasible, at least do not increase harm in EJs directly or indirectly.	A. Harmonize future updates of the County Comprehensive Plan with the EJE.	III	PD

Policy 6: Reduce unique or compounded health risks within EJs.

No.	Objective	Action	Timing	DA
EJ-6.2	Limit Pesticide Exposure to Farmworkers. Support education and awareness about current requirements for spraying and pesticide application to limit farmworker exposure to pesticides, recognizing the compounded impact of farmworkers who may be exposed to pesticides at work and home.	A. Continue to provide training for, and conduct outreach to, pesticide applicators and fieldworkers in English, Spanish, and Indigenous languages. Investigate reported exposure incidents.	I 	AC
EJ-6.3	Continue Advocating for Superfund Site Cleanup. Work with residents of Casmalia to reduce potential health impacts associated with the existing Superfund site.	A. Establish a communication channel between the County and the U.S. Environmental Protection Agency to monitor the progress of the Casmalia Superfund site cleanup and communicate the status to residents of Casmalia.	III	CEO
EJ-6.4	Implement Adaptation Strategies in Rural EJs. Support climate adaptation strategies that account for the hyper-rural nature and unique risks in Casmalia, Cuyama, New Cuyama, and Ventucopa.	A. Continue to work with the community to identify and secure funding for projects that improve resilience in Casmalia and the Cuyama Valley.	II 	CS, OEM, PD

Policy 7: Promote civic engagement in the public decision-making process among EJC residents.

No.	Objective	Action	Timing	DA
EJ-7.1	Culturally Relevant Engagement. Partner with appropriate organizations (e.g., community-based, faith-based, advocacy, and service) that have built relationships, trust, and cultural competency within EJs and with youth, seniors,	A. Continue to coordinate inter-departmental communication strategies for all projects that impact EJs, including culturally relevant engagement opportunities and best practices established by previous projects. For example, working with community-based groups and the Promotores Network.	III 	BW, CEO, CS, FF, PD

Policy 7: Promote civic engagement in the public decision-making process among EJC residents.

No.	Objective	Action	Timing	DA
	persons with disabilities, and immigrants to conduct meaningful outreach for relevant initiatives and EJ issues.	<u>B.</u> Prepare a communication strategy for each EJC with a specific emphasis on engaging community members who do not speak English and use that strategy for all future project outreach. The County shall continue to share public information across a variety of media, technological, and traditional platforms, and languages based on the demographics of the community.	II	CEO, CS, FF, PD
EJ-7.2	Community-Led Initiatives. Support community-driven initiatives, within the County's resources, in EJCs to address priorities and needs through technical assistance, funding, data sources, meeting spaces, meeting facilitation, support services, and other staff resources.	<u>A.</u> Work on community-led initiatives within EJCs, connecting community members to County projects and decision-making processes.	I	BW, CS, FF
		<u>B.</u> Develop and maintain a list of all County projects and programs in EJCs. Facilitate inter-departmental coordination and collaboration on multi-benefit projects supporting EJCs.	I	AC, BW, CEO, CH, CS, FD, FF, GS, HR, IT, OEM, PD, PW, SO, SS
EJ-7.3	Translation and Interpretation. Improve vital County communications, including translation, interpretation, and accessibility for the EJC Members. This includes printed and online materials, meetings and workshops, and other announcements and notices. When possible, also provide translation for non-vital County communication with the public.	<u>A.</u> Review existing County language access plans and provide coordinated support for Departments to develop and implement language access plans.	II	BW, CEO, CH, CS, GS, HR, IT
		<u>B.</u> Continue to make translation and interpretation services available to all County Departments through a centralized contract with the County Executive Office. Encourage translation of non-vital communication, such as social media posts and websites. <u>C.</u> Publish public meeting notices in both English and Spanish. <u>D.</u> Provide translation and interpretation services at public	II	CEO, GS, IT

meetings on issues affecting populations whose primary language is not English. Translation time should not be taken from the person's time limit for comments.

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Policy 7: Promote civic engagement in the public decision-making process among EJC residents.

No.	Objective	Action	Timing	DA
EJ-7.4	Educational Outreach. Partner with school districts, community colleges, trade schools, and continuing education institutions to promote civic engagement opportunities.	A. Support a plan to identify Cradle-to-Career programs and projects that would provide supportive services and economic opportunities for youth and students within their communities.	I	ED, FF
		B. Volunteer coordination in schools including a speaker bureau through Partners in Education.	I	ED
EJ-7.5	Capacity Building and Support. Support and expand opportunities to build and sustain capacity among residents to advocate and engage for community and systems improvements, develop their skill sets as community leaders, and advance their roles as trusted messengers.	A. Support plans developed by EJCs to increase economic opportunities, as appropriate.	II	CS
		B. Continue to work with the Promotores Network and community-based groups on supporting community leaders. Increase capacity-building in EJCs. Support the community empowering itself.	II 	CH, CS, FF, PD, PW, SS
EJ-7.6	Environmental Justice and Health Profiles and Trends. Support the accessibility of EJE data indicators, including CalEnviroScreen and California Healthy Places Index, that provide countywide and census tract-level profiles and data. This is to encourage community-level participation and a greater understanding of environmental and health-related issues and trends.	A. Make a tool or website that shows in one place community environmental profiles. Ensure this tool/website is accessible to the public.	I	CH, PD
EJ-7.7	Data Mapping and Visualization. Ensure data mapping and visualization tools are easily accessible and comprehensible to the general public.	A. Work with the GIS team on increasing map accessibility to the public.	I	IT, PD
EJ-7.8	Digital Access & Literacy. Increase availability and accessibility of digital resources including information, hardware, and software.	A. Broadband Infrastructure: Continue to identify funding and partners to provide wired or wireless broadband connections to EJCs.	I 	CEO, IT, PD, PW

Policy 7: Promote civic engagement in the public decision-making process among EJC residents.

No.	Objective	Action	Timing	DA
		B. Broadband Access: Continue to identify funding and partners to provide computers, laptops, hardware, and software, including ADA accessibility software, to meet EJC residents' needs. Continue the Computers (and training) for Families program through Partners in Education.	I 	CEO, ED, IT, SS
		C. Broadband Literacy: Continue to support/partner on training programs and services in multiple languages to enhance digital literacy. Support smart-technology investments that enhance EJC residents' health and well-being.	I 	CEO, ED, IT, SS
		D. Broadband Affordability: Continue to inform residents of low-cost internet access options and support advocacy for internet access subsidies and affordable internet programs.	I 	CEO, SS
EJ-7.9	Government Accountability, Transparency, and Access. Establish new and improved opportunities for engagement with EICs that provide equitable access, transparency, and accountability.	A. Establish a strategy for Environmental Justice Element implementation, including coordinating with EICs and County departments, advocating for their needs, and facilitating access to County plans, policies, programs, and projects.	I	CEO
		B. Explore financing options for projects and programs within EICs.	I	CEO
		C. Provide information to EICs about who makes decisions, and how they are made, and create conditions that are conducive to EIC residents becoming part of government and community bodies that make decisions.	III	CEO, CS, PD
		D. Provide community trainings and workshops on County government processes and civic engagement opportunities.	I	CEO, CS, PD

Policy 7: Promote civic engagement in the public decision-making process among EJC residents.

No.	Objective	Action	Timing	DA
		E. Departments should develop and maintain long-term relationships with community members and groups in EJCs to gain direct feedback in advance of decisions impacting EJCs.	III	AC, BW, CEO, CH, CS, FD, FF, GS, HR, IT, OEM, PD, PW, SO, SS

Policy 8: Promote safe and sanitary homes within EJCs.

No.	Objective	Action	Timing	DA
EJ-8.1	Encourage the rehabilitation of substandard conditions and preservation of affordability for dwellings owned/occupied by lower-income households in EJCs. [Consistent with HEU Policy 1.1]	A. Continue to support and promote programs including weatherization, Heating Ventilation and Air Conditioning (HVAC), air filtration, mold and mildew prevention, electrification, leak repair, smoke detectors, fire protection systems, defensible space, and other improvements.	III 	CS, FD, PD
		B. Continue to work with development partners to increase the supply of residential units for very-low and low-income households.	II 	CS, PD
		C. Continue to educate tenants and landlords on rights and opportunities related to home improvement resources.	I 	CS
EJ-8.2	Encourage housing that meets the needs of EJCs. [Consistent with HEU Policy 2.1]	A. Continue to support and prioritize the development of affordable housing for different income levels. Support the development of nontraditional housing types, such as ADUs.	III 	CS, PD

Policy 8: Promote safe and sanitary homes within EJs.

No.	Objective	Action	Timing	DA
EJ-8.3	Provide resources within EJs to improve the safety of homes and prevent resident displacement. [Consistent with HEU 4.1]	A. Provide housing resource guides for EJs. Connect Building and Safety inspection information to the communities and provide housing repair resources.	III	CS, PD
		B. Monitor the status of and pursue funding to preserve affordable units at risk of conversion to market rate, including units in mobile home parks (HEU Program 18).	III	CS, PD
		C. Continue to promote affordable options, accessible resources, and supportive services for tenants and homeowners, including connections to landlord-tenant mediation services.	III 	CS, PD
		D. Continue to publicize and promote emergency preparedness educational campaigns in EJs.	II 	FD, OEM
		E. Continue to engage with agencies, non-profit organizations, landlords, property owners, and tenants in EJs to educate about indoor mold and lead hazards, fire prevention, and substandard housing conditions, and identify methods or resources for reduction and prevention.	III 	CH, CS, FD, PD
		F. Continue to conduct outreach and prioritize funding for infrastructure projects in EJs (HEU Program 25).	III 	CS, PW
		G. Continue to enforce Just Cause for Residential Evictions (Santa Barbara County Code Chapter 44, Article IV).	III 	CS