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Katherine Douglas *Public Comment*

From: Haddon, Stacey <S_HADDON@ci.lompoc.ca.us>
Sent: Thursday, March 5, 2026 11:54 AM
To: sbcob
Cc: Albro, Dean; Schwab, Teri; Collins, LoRene
Subject: Written Comment Letter - Draft Environmental Justice Element
Attachments: Letter to County RE Environmental Justice Element.pdf

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Good Morning:

Please see the attached scanned copy of the sign comment letter from the City Council of the City of Lompoc regarding the Draft County of Santa Barbara Environmental Justice Element.

Let me know if you have any questions regarding this matter.

Thank you,

Stacey Haddon, City Clerk

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March 4, 2026

VIA ELECTRONIC MAIL

Board of Supervisors
Attn: Clerk of the Board
County of Santa Barbara
sbcob@countyofsb.org

Re: County of Santa Barbara Environmental Justice Element

Dear Board of Supervisors:

The City of Lompoc urges the County of Santa Barbara ("County") Board of Supervisors to consider the impacts of its General Plan policies on all communities located within Santa Barbara County, not only those communities located within the unincorporated area as it considers adoption of its Environmental Justice ("EJ") Element.

As stated in the proposed County EJ Element, the EJ Element "focuses on the needs of disadvantaged communities" as determined using the California Office of Environmental Health Hazard Assessment ("OEHHA) CalEnviroScreen 4.0 Mapping Tool. Though the City of Lompoc is not officially considered to be a disadvantaged community based on the CalEnviroScreen 4.0 Mapping Tool, it is a low income community as defined in that tool. Government Code § 65302(h) defines a "disadvantaged community" as one that has (1) either been identified by the California Environmental Protection Agency as a disadvantaged community, or (2) that is a "low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation." A "low-income area" is further defined to mean an area with "household incomes at or below 80 percent of the statewide median income". Gov't Code § 65302(h)(4)(A) and (C).

The City meets the definition of "low income area" as defined in Government Code § 65302, as the City's median household income is below 80% of the statewide median income.¹ Additionally, other State disadvantaged communities mapping tools, such as the tool provided by the California Department of Water Resources, indicate that for the most recent reporting period of 2019-2023, more than half of the City is actually considered to be a "disadvantaged community."² Also, while the City has roughly 10% of

¹ Based on information included in the 2024 American Community Survey, 1-Year and 5-Year Estimates.

² <https://gis.water.ca.gov/app/dacs/>

the population of Santa Barbara County, the City has 18% of the environmental justice communities within the County, and only 6% of the County's jobs with a job deficit of 4,735 jobs.³ Addressing the impact of EJ concerns within the City remains challenging given the lack of available land for development, which impacts the City's ability to provide housing and attract employers that will provide quality jobs.

As you know, California Government Code § 65040.12(e) defines "Environmental Justice" as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation and enforcement of environmental laws, regulations, and policies." In support of its EJ objectives, the Santa Barbara County draft EJ Element incorporates nine policies, including, but not limited to, promoting public facilities in Environmental Justice Communities (EJCs), improving air quality within EJCs, reducing exposure to pollution within EJCs, and promoting safe and sanitary homes within EJCs. Some of these goals are coordinated through the County of Santa Barbara One Climate Initiative, which includes in its Vision Statement the goal of improving health and increasing accessibility to safe and affordable housing and addressing equity through increasing resources directed to low-income communities and communities of color. It is the City's position that any attempt by the County to address these issues only within low-income and disadvantaged communities in the unincorporated area of the County without consideration of the effect of County growth and development on the incorporated areas misses the mark.

Housing Availability

The EJ Element recognizes that there is an immediate need for new affordable housing within the EJCs identified in the EJ Element. One way to address these needs is by supporting development of housing for all income levels, including affordable housing, within the incorporated cities located within Santa Barbara County, where there already exists the public infrastructure and services needed to support urban-level development. Notwithstanding these policy goals of the County, County representatives on the Local Agency Formation Commission ("LAFCO") have not supported annexation of property to the City of Lompoc to allow new residential development. Furthermore, this lack of support for municipal annexations into the City of Lompoc is not new – the 2011 Santa Barbara County Association of Governments ("SBCAG") Environmental Scan reflects that during the period of 1984 to 2008, more than 22,000 acres of agricultural land were converted to other uses, however, the City has been unable to annex agricultural land for residential use.

Based on the City's 2025 General Plan Annual Report, the City is currently not meeting its share of the Regional Housing Needs Allocation ("RHNA"). Specifically, the City was

³ SBCAG Regional Environmental Justice Communities Update: 2029-2060 Regional Transportation Plan & Sustainable Communities Strategy, February 11, 2026; SBCAG RHNA Supplemental Report, June 18, 2020.

allocated a total of 2,248 units of housing at all income levels, including 166 very low income units, 262 low income units, 311 moderate income units, and 1,509 above moderate income units. Of this number, the City still needs 2,188 units in order to satisfy its RHNA goals based on the number of permits issued since 2023. Development of housing within the City has remained stagnant (as has the City's population) as compared to other cities within the North County. For example, while the City's population actually shrank in 2021, Vandenberg Village, an unincorporated community outside Lompoc, has seen double digit population growth and new housing over the last decade. This inability to grow and add new housing stock adversely impacts the City's ability to expand its tax base, encourage economic development, and bring in new jobs, further exacerbating the economic divide between the City and other areas of the County. SBCAG's RHNA Supplemental Report prepared as part of the most recent RHNA Allocation Plan, 6th Cycle update for the period 2023-2031, further reflects that during the 5th RHNA cycle, Lompoc had the lowest production of housing in Santa Barbara County.

For growth and development to occur within the City, the City will require County support of annexation of agricultural land into the City. Development of housing for all income levels is critical to ensuring that the City has a balanced housing inventory and that the City does not continue to shoulder a disproportionate share of responsibility for housing and serving low and very low income populations. Owners of property that should be considered for annexation are actively seeking to build this required housing within the City.

In order to address these concerns, the City requests that the County consider adopting additional policies that will help facilitate the potential conversion of agricultural land to residential uses in order to facilitate the development of housing for all income levels and support annexation as a tool to ensure that new development receives the appropriate level of municipal services. The City also requests that the County consider the addition of new policies and actions that will help prevent the concentration of poverty in any one area or jurisdiction within the County.

Improving Air Quality and Reducing Exposure to Pollution

While housing is a primary issue for the City, the County's current development policies also create other environmental justice concerns within the City of Lompoc, specifically related to air quality and pollution. The current agricultural use of property located outside of the City has a significant impact on residents within the City of Lompoc. Specifically, these agricultural operations rely on the application of pesticides with chemicals that can endanger nearby communities through windborne "pesticide drift." This presents a significant EJ concern for residents, including elementary school students, in that such agricultural uses adjacent to elementary schools expose children within the City of Lompoc to these dangerous chemicals. Census blocks within the vicinity of such agricultural uses were previously identified as having increased rates of respiratory

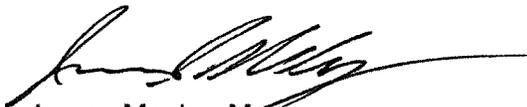
disease and greater rates of pesticide exposure than 85% to 87% of the census tracts in California, based on data regarding pesticide use between 2017 and 2019.

Though the County's Policy Implementation Matrix included as Attachment A to the proposed EJ Element evaluates a number of issues related to air quality and reducing exposure to pollution, most of these are targeted at industrial and not agricultural land uses. The City supports the inclusion of Action 4.5.C. and 5.3.A., in the implementation matrix, regarding maintenance of an air monitoring station for pesticides in Santa Maria and monitoring pesticide use around schools and other sensitive sites, respectively. However, the City strongly urges the County to expand these actions to include more proactive monitoring of air quality impacts from agricultural operations in unincorporated Santa Barbara County that are adjacent to the City of Lompoc to ensure that such operations remain compliant with applicable state laws and regulations and that impacts within the City are appropriately monitored and mitigated. This is especially critical given that there is no buffer zone on 67% of the agricultural land located adjacent to the residential uses within the City.

Conclusion

The City appreciates the Board of Supervisors' consideration of these comments. The City also recognizes that the County has significant responsibilities with respect to the unincorporated area of Santa Barbara County. However, the City respectfully requests that the County not lose sight of the impacts its decisions and policies have on the incorporated areas and the need for environmental justice within the City's limits. Whether it may be funding improvements for County-owned and controlled transportation infrastructure within the City, evaluation of the impacts to the City's air quality and pollution levels caused by agricultural activity within the unincorporated part of the County, or support for municipal annexations needed to facilitate increased housing development, these problems require collaborative political support at all levels of local government within Santa Barbara County.

Very truly yours,



James Mosby, Mayor
City of Lompoc