



COUNTY OF SANTA BARBARA PLANNING AND DEVELOPMENT

MEMORANDUM

TO: Santa Barbara County Planning Commission

FROM: Alex Tuttle, Deputy Director, Long Range Planning Division

STAFF CONTACT: Zoë Carlson, Project Manager, (805) 568-3532

DATE: October 27, 2025

RE: Environmental Justice Element
Case No. 22GPA-00000-00003
County Planning Commission Hearing – November 5, 2025

To date, the County Planning Commission (Commission) has held two hearings (August 27 and October 8, 2025) to consider making recommendations to the Board of Supervisors (Board) regarding the proposed Environmental Justice Element (EJE) of the Comprehensive Plan. On August 27th, staff presented an overview of the EJE, including the legal requirements, state guidance, and Planning and Development’s process for developing the EJE. On October 8th, staff provided a detailed presentation including all of the draft policies and objectives as well as sample actions in the EJE. Some minor clarifying changes to the EJE were discussed and presented at the October 8th hearing in response to comments, questions, and concerns that had been raised by members of the Commission and the public at the first hearing. Staff is proposing some further text revisions based on additional comments, questions, and concerns that were expressed at and subsequent to the October 8th hearing. Collectively, the following proposed changes (including those discussed and presented at the October 8th hearing) shown in **bold red font** clarify the focus, purpose, and intent of the EJE.

A. EJE Chapter 1 Proposed Changes

The following changes to Chapter 1. Section 1.6 will clarify the intent of the EJE.

1.6 **Application Utility** of This Document

The EJE, besides being a planning document, is also designed as a resource for County community members. It is intended to inform community members about County operations, structure, and resources. **The EJE is not intended to produce additional regulations without additional public review and input, nor is its purpose to regulate development activity. For the County,** The EJE **will assist the County is an important step** in gaining a greater understanding of community needs to help identify opportunities for

funding, programs, and projects to improve the conditions of underserved and underrepresented communities

B. EJE Chapter 2 Proposed Changes

The following changes to Chapter 2. EJ Communities will clarify how the Environmental Justice Communities (EJC)s were identified and provide additional clarity regarding the boundaries of the EJs.

The following text will be added as introductory text to the beginning of Chapter 2:

The development of an Environmental Justice Element is a two-step process, following State requirements. The first step is identifying communities that are low-income and disproportionately burdened, and the second step is creating County goals, policies, and objectives that prioritize improvements and programs that address their needs.

2.1: EJC Mapping Requirements

The State Office of Land Use and Climate Innovation (LCI) produces guidelines for general plans including EJ elements. Recommendations for EJC identification analysis¹ are provided by LCI that include mapping: 1) household median incomes at or below the statewide median income by census tract, 2) areas at or below the State of California Housing and Community Development (HCD)'s state income limits, 3) disproportionate environmental burdens, and 4) community-specific data for health risk factors and pollution. The LCI guidance also acknowledges that jurisdictions have discretion in identifying EJs based on local knowledge and experience. The County completed a thorough screening analysis ([Appendix B: Mapping Methodology](#)) and determined that Cuyama, New Cuyama, Ventucopa, Sisquoc, Garey, Casmalia, Los Alamos, and Isla Vista meet the state definition of EJs. All of these EJs were also identified during the DUC screening analysis update in 2022. Isla Vista does not meet the state's criteria for a DUC because it is not rural, but does meet the criteria for an EJ. **The boundary of each EJ shown on the Map of EJs is consistent with the current boundaries for these communities in the County of Santa Barbara Comprehensive Plan. The Census Designated Place (CDP) boundaries were used to delineate the EJ boundary for Cuyama, New Cuyama, Sisquoc, Garey, Casmalia, Los Alamos, and Isla Vista. For Ventucopa, the Existing Developed Rural Neighborhood (EDRN) boundary was used. The policies, objectives, and actions within the EJE are intended to support community members (EJ Members) residing within EJs.**

¹ State Office of Land Use and Climate Innovation (LCI), formerly State of California Governor's Office of Planning and Research, "General Plan Guidelines, Chapter 4: Required Elements," last modified June 1, 2020, 10, https://lci.ca.gov/docs/20200706-GPG_Chapter_4_EJ.pdf.

Disproportionate Environmental Burdens

Staff proposes moving the “Disproportionate Environmental Burdens” discussion to directly follow Section 2.1: “EJC Mapping Requirements” section. This makes it clear the data provided on Oil and Gas and other sources of pollution is a part of the mapping methodology and selection process of the EJCs rather than a key community issue. We also propose adding the following text to the beginning of the “Disproportionate Environmental Burdens” section to be clear as to the intention of including this data. The text would appear as follows:

Various data sources were used to substantiate the environmental burden criteria when identifying EJCs. These data sources, including CalEnviroScreen, the CalEPA Regulated Site Portal, and oil and gas wells provided by the California Geologic Energy Management Division (CalGEM), are not intended to prove environmental risk nor justify additional regulations. Instead, this data is intended to show potential sources of pollution that, along with other health risk factors, contribute to an environmental burden and substantiate the identification of these communities as EJCs.

2.2: EJ Terminology

- EJC: an **area community** that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.
- EJC Member: an individual or household who **lives in an EJC and** is low-income and disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.

C. Appendix A. Implementation Matrix Proposed Changes

The following changes would clarify the intent of the following objectives and actions in the Draft EJE Implementation Matrix.

Policy 1: Promote public facilities in EJCs.		
No.	Objective	Action
EJ-1.2	Community Siting and Improvement Priorities. When considering new or improved public facilities within EJCs,	A. Conduct engagement to get feedback on recreational facilities from the community. Ensure consistent

Policy 1: Promote public facilities in EJCs.

No.	Objective	Action
	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).	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 EJCs.

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

No.	Objective	Action
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 accessibility to green spaces and recreation areas.	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.

Policy 4: Improve air quality within EJCs.

No.	Objective	Action
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 EJCs in compliance with applicable existing standards and monitor the environmental and health impacts on	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 EJCs if not already available.

Policy 4: Improve air quality within EJs.		
No.	Objective	Action
	populations in EJs to track progress and outcomes.	
EJ-4.2	Reduce Wildfire Smoke Exposure within EJs. Provide education and resources, including air quality information, to reduce wildfire smoke exposure for low-income EJ residents who cannot relocate and outdoor workers.	B. Continue to provide education and resources for vegetation fuel reduction efforts (<u>e.g., prescribed burns, prescribed herbivory, mechanical treatments, etc.</u>) that minimize wildland fire ignitions and the potential for large wildfires.
EJ-4.3	Everyone Has a Right to Clean, Breathable Air. Support grant funding and other <u>similar</u> initiatives to improve indoor and outdoor air quality and access to clean air within EJs.	A. Apply for and/or administer grants for additional air quality monitoring <u>for the residents of</u> in EJs.

Policy 5: Reduce exposure to pollution within EJs.		
No.	Objective	Action
EJ-5.1	Monitor and Enforce Industrial Land Uses in Proximity to EJs. Monitor, evaluate, and take steps to address the immediate and long-term health and environmental impacts of industrial land use in and around EJs.	B. <u>Recommend a</u> A <u>Amendments to</u> 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 <u>to residents of</u> of EJs from future industrial land uses. Population demographics (such as lower population numbers) cannot be used to justify industrial location siting in EJs.
EJ-5.2	Limit New Toxic and Hazardous Waste Facilities. Disallow <u>Limit</u> siting and construction of new large-scale hazardous waste facilities on or near sensitive land uses in and around EJs.	A. Review the Zoning Codes and Hazardous Waste Element to identify opportunities to prevent <u>limit</u> new Hazardous Waste Management Facilities (HWMF) within or adjacent to EJs if necessary.

Policy 5: Reduce exposure to pollution within EJs.		
No.	Objective	Action
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.	B. Review the Zoning Code to identify opportunities to <u>recommend, where necessary, adjustments to setback requirements for new heavy industrial uses buffers</u> to protect sensitive land uses <u>(e.g., schools and residences)</u> within EJs.
EJ-5.5	Existing Sensitive Land Uses. Consistent with the Land Use Element, promote 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 EJs.	A. Seek funding to complete a community health needs assessment for each EJC including surveys, data collection, and land use analysis. <u>Recommend updates to regulations based on the results of the health needs assessment</u> if needed <u>to reduce exposure of people living within EJs to pollution.</u>

E. RECOMMENDATIONS AND PROCEDURES

The County Planning Commission’s motion should include the following:

1. Make the required findings for approval, including CEQA findings, and recommend that the Board of Supervisors make the required findings for approval, including CEQA findings, of the Environmental Justice Element project (Attachment A).
2. Recommend that the Board of Supervisors determine that Case No. 22GPA-00000-00003 is exempt from the provisions of CEQA pursuant to 15061(b)(3) of the State Guidelines for the Implementation of CEQA (Attachment B); and
3. Adopt a resolution (Attachment C) recommending that the Board of Supervisors adopt the proposed comprehensive plan amendment as revised by this staff memorandum

dated October 27, 2025, Case No. 22GPA-00000-00003, adding the Environmental Justice Element into the Comprehensive Plan (Attachment C, Exhibit 1).

Refer back to staff if the County Planning Commission takes other than the recommended action for appropriate findings.

ATTACHMENTS

- A. Findings for Approval
- B. Notice of Exemption
- C. County Planning Commission Resolution (Case No. 22GPA-00000-00003)
 - 1. Board of Supervisors Resolution Adopting the Environmental Justice Element