

Sheila de la Guerra

# Public Comment

#4

**From:** claire.wineman@grower-shipper.com  
**Sent:** Monday, March 9, 2026 12:18 PM  
**To:** sbcob  
**Subject:** 3.10.26 D4 EJE Public Comment  
**Attachments:** GSA SB SLO EJE - BOS 3.10.26 combined.pdf



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Good morning,

Please see attached for public comment for Ite D4-Environmental Justice Element. I would appreciate confirmation of successful receipt of this message.

Thank you,  
Claire

Claire Wineman  
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Grower-Shipper Association  
of Santa Barbara and San Luis Obispo Counties  
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March 9, 2026

Santa Barbara County Board of Supervisors  
C/O [sbcob@countyofsb.org](mailto:sbcob@countyofsb.org)

Re: D4 Environmental Justice Element (EJE)

Dear Chair Nelson and Supervisors,

The County of Santa Barbara has a long history of dedication to the goals described in the Environmental Justice Element. On behalf of the Association, we appreciate the outreach and effort that has gone into drafting the EJE and supporting documents over the past several years, and the revisions made by the County Planning Commission. We appreciate balancing EJ goals with the realities of promoting vibrant rural communities and opportunities for income and employment throughout the County.

We appreciate the Planning Commission's revisions that focus on the application of the Element to residents in the EJC. We respectfully request that the Map of Environmental Justice Communities also be updated to reflect the Planning Commission's changes for Sisquoc and Garey. The use of broad census tracts disproportionately impacts Sisquoc and Garey. Although not included in the Element, if our estimates and calculations are correct, we estimate that the Sisquoc and Garey "census designated places" total an estimated 2,350 acres. Of this total combined acreage, only 62 acres or 2.6% are actually zoned/designated residential or public facilities. The majority of the tract is zoned for and utilized as agriculture. This broad brush does not accurately reflect on-the-ground conditions and disproportionately impacts the surrounding area when compared to other EJCs in the County. In finalizing the EJE, we urge the Board to update the EJC Map for Sisquoc and Garey to reflect the Commission's language revisions and avoid unintended consequences for residents and agricultural operations for the foreseeable future.

Although intent was clarified through the positive revisions from the Planning Commission, we would also like to register our lingering concerns with how certain Policies and Actions could be construed and applied in the future beyond what is intended at the present time (especially EJ 4.1, 4.4, and 5.1).

We have previously commented on the County's ability to comply with SB 1000 without creating an overly prescriptive Appendix A. We continue to believe that specific actions are better addressed through the County's other implementing mechanisms (such as workplans, LUDC amendments, projects, budget allocations, etc.), rather than as a new component of the EJE. Although we appreciate PC language clarifying intent and continue to fundamentally disagree with creating a new document that will require updates in perpetuity, we particularly oppose future updates that do not have a clear process for public comment with final review by the Planning Commission and Board of Supervisors, and instead "will be updated as needed by staff from each department and made available to the public." These implementing actions could create very impactful negative consequences for our members, employees, and communities, which is very concerning, and especially without sufficient opportunity for review and engagement.

We found the State guidance and mandate to develop the Element and specific contents of the EJE to be overly prescriptive in ways that limit local effectiveness. We urge the County to incorporate in its Legislative Platform local flexibility or alternate methods of compliance to best serve its community.

Finally, we would also like to remind the Board and Public of the limitations of CalEnviroScreen 4.0, which conflates use with exposure, weighs socioeconomic factors, and does not distinguish causation from correlation.

The Association remains committed to working with the County to support environmental stewardship, long-term viability of agriculture, and the communities it supports. We appreciate the opportunity to have engaged in this important process over the past several years as it draws to a close.

Sincerely,

A handwritten signature in cursive script that reads "Claire Wineman".

Claire Wineman

President

Attached: Comments on August 2025 Draft County of Santa Barbara Comprehensive Plan  
Environmental Justice Element dated October 3, 2025



**SOMACH SIMMONS & DUNN**  
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October 3, 2025

*Via Electronic Mail Only*

Planning Commission  
County of Santa Barbara  
c/o David Villalobos  
123 East Anapamu Street  
Santa Barbara, CA 93101  
[dvillalo@countyofsb.org](mailto:dvillalo@countyofsb.org)

Re: Comments on August 2025 Draft County of Santa Barbara Comprehensive  
Plan Environmental Justice Element

Dear Chair Ford, Vice Chair Reed, and Commissioners Cooney, Parke, and Martinez:

On behalf of the Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties (Grower-Shipper), we submit comments to the County of Santa Barbara (County) Planning Commission on the August 2025 Draft County Comprehensive Plan Environmental Justice (EJ) Element. Grower-Shipper represents 150 growers, shippers, farm labor contractors, and supporting agribusinesses on matters related to agriculture within Santa Barbara and San Luis Obispo Counties. Grower-Shipper members grow important crops that are consumed locally and statewide, such as broccoli, strawberries, lettuce, vegetable transplants, flowers, tree fruit, and wine grapes. Grower-Shipper's mission is to maintain a vibrant agricultural industry in the region by assisting members to address challenges and capitalize on strengths and opportunities.

Grower-Shipper thanks the County for the opportunity to again comment on its Draft EJ Element. Grower-Shipper has submitted comments through its participation in the County Agricultural Advisory Committee (AAC) and County Equity Advisory and Outreach Committee (EAOC), and most recently submitted comments on the Draft EJ Element on August 25, 2025, which are attached hereto and fully incorporated herein. Grower-Shipper appreciates consideration given to its initial comments as well as consideration given to these supplemental comments. As explained in more detail below, Grower-Shipper remains concerned about the approach taken by the County in developing its EJ policies, objectives, and actions and in identifying certain Disadvantaged Communities (DACs), also referred to in the EJ Element as Environmental Justice Communities (EJCs).

**A. The EJ Element Includes Unnecessarily Specific Policies and Actions that Can Result in Significant Adverse Impacts on Agricultural Resources and the Economy as well as Statutory and Regulatory Conflicts**

Senate Bill (SB) 1000 (2016), codified in relevant part in Government Code section 65302, subdivision (h), requires that all general plans include either an EJ element identifying goals, policies, and objectives or include EJ-oriented policies and objectives throughout other general plan elements. SB 1000 does not, however, require any level of detail or specificity for these EJ policies or actions beyond directing that EJ goals, policies, and objectives “shall ... reduce the unique health risks in [DACs]” by reducing pollution exposure, promoting “public facilities, food access, safe and sanitary homes, and physical activity,” promoting “civic engagement in the public decisionmaking process,” and prioritizing “improvements and programs that address the needs of [DACs].”<sup>1</sup> These general categories can, and here should, result in *general* EJ policies and actions that can maintain flexibility during implementation and when determining future actions.

Moreover, the Attorney General SB 1000 Best Practices<sup>2</sup> is not controlling authority.<sup>3</sup> At most, it may be considered persuasive, like a formal Attorney General legal opinion.<sup>4</sup> Notwithstanding, SB 1000 Best Practices does not claim that SB 1000 mandates specific EJ policies or actions and acknowledges that “an effective environmental justice policy in one jurisdiction may not be relevant or effective in another ...” and that “[a]nyone reviewing this document to determine SB 1000 compliance responsibilities should consult their own attorney for legal advice.”<sup>5</sup> The Attorney General’s suggestions and examples for policies and actions use flexible language, like “may” and “could,” indicating an agency *may* exercise its discretion, where appropriate, to develop a policy to address a particular concern.<sup>6</sup> At base, SB 1000 Best Practices provides *suggestions* not directives.

Thus, the County is not obliged to include the detailed policies and objectives that it currently includes in the EJ Element. For example, Policy 4 to “Improve Air Quality within EJC’s” is accompanied by several objectives that suggest or prescribe specific actions, like imposing new air emission requirements on agricultural operations and industrial businesses

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<sup>1</sup> Gov. Code, § 65302, subd. (h)(1).

<sup>2</sup> Available at <https://oag.ca.gov/environment/sb1000>.

<sup>3</sup> See, e.g., *Thorning v. Hollister School District* (1992) 11 Cal.App.4th 1598, 1604.

<sup>4</sup> Although, courts regularly find Attorney General opinions to not be persuasive (see, e.g., *People ex rel. Foundation for Taxpayer and Consumer Rights v. Duque* (2003) 105 Cal.App.4th 259, 268; *Almond Alliance of California v. Fish & Game Com.* (2022) 79 Cal.App.5th 337, 358; *Sukut Construction, Inc. v. Rimrock CA LLC* (2011) 199 Cal.App.4th 817, 830; *Rideout Hospital Foundation, Inc. v. County of Yuba* (1992) 8 Cal.App.4th 214, 227), and, in any event, best practices are not classified as a formal opinion. The Attorney General labels them informally as “colleague letters.”

<sup>5</sup> Attorney General SB 1000 Best Practices, pp. 2, 13.

<sup>6</sup> *Id.*, pp. 13-14.

that support agricultural operations and which may conflict with or impede existing statutory and regulatory requirements for a resource that is already highly regulated by laws and agencies like the Clean Air Act, the California Clean Air Act, the California Air Pollution Control Act, the U.S. Environmental Protection Agency, the California Environmental Protection Agency, and the Santa Barbara County Air Pollution Control District. SB 1000 does not require this specificity. In fact, SB 1000 directs agencies to “[i]dentify objectives and policies to *reduce*...pollution exposure”<sup>7</sup> not improve air quality. The former is achievable through flexible policies; the latter is a much broader effort that may ultimately violate the California Right To Farm Act<sup>8</sup> and the Santa Barbara County Right To Farm Ordinance<sup>9</sup> by turning existing agricultural-related activities into nuisances due to a “changed condition in or about a locality.” Policy 4 and its objectives should be revised to better address the fundamental need for good land use planning and compatibility to proactively prevent land use conflicts and resulting issues. For more feedback on EJ Element policies and objectives, please refer to Grower-Shipper’s previous comment letter (see attachment).

Similarly, the County is not required under SB 1000 to promulgate the very specific policies and actions listed in Appendix A to the draft EJ Element. These policies and actions reduce the County’s flexibility in addressing EJ concerns and can quickly become dated and counterproductive. Grower-Shipper again requests that the County remove Appendix A from its EJ Element. Compounding this SB 1000 overreach is that several of these policies and actions have a reasonable likelihood of resulting in unintended significant and adverse impacts on the County’s agricultural operations and resources and the local and regional economy. For example, Policy EJ-1.2 requires that the County prioritize siting new public facilities, like schools and parks, on community feedback. This could result in a school or park being sited near an existing agricultural use that could then result in further restrictions being placed on the existing use and predictable land use conflicts. The most effective way to protect both vital agricultural resources and sensitive uses is to refrain from inducing sensitive uses into or next to agricultural areas and agricultural support facilities. As discussed, introducing policies and actions that would turn agricultural activities into nuisances, restrict these activities, and potentially eliminate them controverts the California Agricultural Protection Act and the Santa Barbara County Right-to-Farm Ordinance and may also conflict with the California Land Conservation Act (Williamson Act),<sup>10</sup> depending on location.

Other examples—Policies EJ-4.4 and EJ-5.1 and their actions may result in industrial businesses that support agricultural operations being required to further modify their operations in areas where the population immediately surrounding these uses has been mistakenly identified as EJs. Policy EJ-5.3 and its actions require the minimization of

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<sup>7</sup> Gov. Code, § 65302, subd. (h)(1)(A), italics added.

<sup>8</sup> Cal. Civ. Code, § 3482.5, subd. (a).

<sup>9</sup> Santa Barbara County Code, § 3-23, subd. (d).

<sup>10</sup> Gov. Code, § 51200 et seq.

pesticide use near schools and other sensitive receptors and potentially an adjustment of buffers to protect sensitive uses, which could go above and beyond current and future California Department of Pesticide Regulation (DPR) requirements and especially impact local agricultural operations and resources if a new school were located near an established agricultural use or an operation supporting an agricultural use pursuant to Policy EJ-1.2 (discussed above). This is especially problematic given that the County does not necessarily have land use jurisdiction over where schools are sited, and schools are often imprudently located in agricultural areas, which include industrial places of work. Consistent with the Right to Farm and sound planning principles, the focus should be on ensuring that new schools and other sensitive receptors are not located near existing agricultural operations and supporting land uses. Policy EJ-6.1 is too broad and overly prescriptive and does not account for the vital role that agricultural business and employment opportunities provide to County residents and that these operations play in the region's food supply and economy. Policy EJ-6.2 should better focus on protecting people and the environment within existing statutory and regulatory frameworks, including DPR requirements. For more feedback on Appendix A policies and actions, please refer to Grower-Shipper's previous comment letter (see attachment).

Revising or eliminating overly specific and inflexible EJ policies, objectives, and actions would help avoid unintended and significant adverse impacts to agricultural resources and operations, the local food supply, and the economy and would not result in additional, increased, or disproportionate impacts to natural resources or EJCs. The EJ Element is in draft form. Thus, the County has the discretion to review and process feedback from stakeholders like Grower-Shipper and its members and make changes that will avoid the significant impacts discussed in this letter. Accordingly, Grower-Shipper requests that the County better incorporate the feedback provided by agricultural stakeholders, including Grower-Shipper and its members, to revise the proposed policies and objectives in a manner that does not create unacceptable risk to agriculture in the County or have a reasonable likelihood of resulting in significant adverse impacts to the County's agricultural resources.

Without revising and omitting certain policies, objectives, and actions such that the EJ Element will not result in reasonably foreseeable significant impacts to agricultural resources, the County cannot correctly claim that the EJ Element is exempted from review under the California Environmental Quality Act (CEQA)<sup>11</sup> by the "common sense exemption" because there is a "possibility" it will have "a significant effect on the environment."<sup>12</sup> Grower-Shipper therefore opposes the County's reliance on this or any CEQA exemption until such time as the EJ Element is appropriately modified.

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<sup>11</sup> Pub. Resources Code, § 21000 et seq.

<sup>12</sup> Cal. Code Regs., tit. 14, § 15000 et seq. (CEQA Guidelines), § 15061, subd. (b)(3); see also *id.*, § 15378, subd. (A)(1) [general plan elements are subject to CEQA review]; Pub. Resources Code, § 21001.1.

**B. The EJ Element Misidentifies Agricultural Areas as EJCs; This Can Result in Significant Adverse Impacts on Agricultural Resources and the Economy as well as Statutory and Regulatory Conflicts**

SB 1000 identifies a DAC as an unspecified “area” either identified in “Section 39711 of the Health and Safety Code” or that is “low-income” and “disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.”<sup>13</sup> Section 39711 of the Health and Safety Code likewise defines DACs as unspecified “areas.”<sup>14</sup> Neither statutory provision mandates exactly how local agencies should identify DACs—certainly, neither requires that DACs be identified broadly by entire Census Designated Places and census tracts. In its EJ Element, however, the County broadly defined DACs, referred to also as EJCs, by entire Census Designated Places and census tracts.<sup>15</sup> This approach conflates communities that could truly benefit from additional consideration with areas comprised largely of agricultural operations and limited population, such as the unincorporated communities of Garey and Sisquoc.

Garey and Sisquoc are listed in the EJ Element as two of eight communities identified as EJCs, but Garey and Sisquoc consist primarily of farmland and agricultural operations. Los Alamos, another community identified as an EJC, has more housing than Garey and Sisquoc but still consists of a significant amount of agricultural land uses. The identification of Garey, Sisquoc, and Los Alamos as EJCs can reasonably be expected to result in new and increased restrictions on existing agricultural uses and operations supporting agricultural uses. Such restrictions can significantly and adversely impact agricultural resources and the productivity of prime and important farmlands—not to mention business and earnings opportunities for residents of those very locations. It is possible that these vital operations and uses could be completely halted by policies, actions, and decisions contemplated in the current draft EJ Element. Obstructing established agricultural operations and uses in this manner controverts the California Right to Farm Act and the Santa Barbara County Right To Farm Ordinance, discussed above.

Classifying agricultural areas that are relatively unpopulated as EJCs is unsupported and unreasonable and will result in significant consequences for Grower-Shipper members. Any further restrictions placed upon agriculture operations and uses within the County can result in adverse impacts on agricultural resources, the local food supply, and the economy. This cannot be the County’s desired result. Accordingly, Grower-Shipper opposes the identification of the entirety of Garey, agricultural areas in Sisquoc and Los Alamos, and other similar agricultural areas with sparse population as EJCs.

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<sup>13</sup> Gov. Code, § 65302, subd. (h)(4)(a).

<sup>14</sup> Health & Saf. Code, § 39711, subd. (a).

<sup>15</sup> See EJ Element, App. B, pp. B-5, B-7 – B-9.

Planning Commission  
RE: Comments on Draft County EJ Element  
October 3, 2025  
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Thank you for your consideration of this comment letter. We are happy to answer any questions the County may have. Please feel free to contact me at [ktaber@somachlaw.com](mailto:ktaber@somachlaw.com). Also, please add me to the list of parties that receive all notices regarding the EJ Element.

Sincerely,

A handwritten signature in black ink that reads "Kelley M. Taber". The signature is written in a cursive style with a large, stylized "K" and "T".

Kelley M. Taber

Attachment

cc: Zoe Carlson, Planner, Long Range Planning Division ([carlsonz@co.santa-barbara.ca.us](mailto:carlsonz@co.santa-barbara.ca.us))

# **ATTACHMENT**



August 25, 2025

Santa Barbara County Planning Commission  
C/O David Villalobos [dvillalo@countyofsb.org](mailto:dvillalo@countyofsb.org)

Re: County of Santa Barbara – Draft Environmental Justice Element (EJE)

Dear Chair Bridley and Commissioners,

The County of Santa Barbara has a long history of dedication to the goals described in the Environmental Justice Element. The current Draft has several flaws and limitations of that could actually undermine the County in achieving its goals for the benefit of the communities. We would have welcomed the opportunity to provide comments on a Draft before being presented at the Planning Commission, and encourage longer timeframes for comment before drafts are taken to the Planning Commission and/or Board of Supervisors in the future. We appreciate the opportunity to provide these preliminary comments and look forward to further refining our comments and engagement upon additional review and dialogue with our members and leadership to best promote vibrant communities.

### **Fundamental Approach**

Many other County Comprehensive Plan Elements provide broad, over-arching policy direction and guidance, rather than prescriptive actions that can quickly become quickly dated or even counter-productive. We understand that SB 1000 mandates the inclusion of specified objectives and goals, but believe that specific actions are better addressed through the County's other implementing mechanisms (such as workplans, LUDC amendments, projects, budget allocations, etc.), rather than as a component of the Element. We do not support creating a new Appendix A that will require updates in perpetuity. We particularly oppose creating a new action plan and subsequent updates that does not have a clear process for public comment with final review by the Planning Commission and Board of Supervisors. These implementing actions could create very impactful negative consequences for our members, employees, and communities, which is very concerning, and especially without sufficient opportunity for review. **We believe the Element can fulfill the State-mandated objectives and policies without Appendix A.** We further have significant critiques of many of the of the proposed Actions, but due to the limited time available to review and comment on the Draft, we are unable to provide additional specific comments on these deep flaws within the given time.

We found the State guidance and mandate to develop the Element and specific contents of the Element to be overly prescriptive in ways that limit local effectiveness. **We urge the County to incorporate in its Legislative Platform greater local flexibility or alternate methods of compliance to best serve its community.**

We applaud Staff for incorporating community feedback that declined to limit themselves as "disadvantaged" and instead favored a more productive and appropriate term of "under-resourced" or EJ Community. We further appreciate that Staff recognized the importance of maintaining strong economic industries and the role this plays for income and employment in the County, including EJs.

We applaud Staff for receiving feedback regarding the limitations of CalEnviroScreen 4.0, which conflates use with exposure and weighs socioeconomic factors. **In the EJ Terminology, we urge the Draft to be corrected from "is disproportionately affected by environmental pollution and other hazards" to "may be disproportionately affected by environmental pollution and other hazards."**

## Opportunities to Strengthen Win-Win Outcomes and Needed Revisions

The Draft overlooks several key tools for the County to achieve win-win outcomes.

**Food Access.** We applaud the recognition of the importance of affordable fresh fruits and vegetables as a part of overall health, wellbeing, and nutrition—our members play a critical role in providing fresh produce to our Country. We are interested in whether the County has a role in further facilitating access to fresh produce both within and beyond EJs, such as County of Office Education or School District produce purchasing programs, institutional purchasing programs, or other creative mechanisms. Farmers markets are one option, but to further support access and affordability, larger-scale purchasing programs of both conventional and organic produce should also be included when possible, and especially policies to promote growing fresh produce in Santa Barbara County in general.

**EJ 4.2 Air Quality and EJ 6.4.** We further call upon the County to include efforts to support vegetation management, including prescribed burns, to reduce catastrophic wildfire events. In a recent Stanford<sup>1</sup> study, “The research reveals that prescribed burns can reduce the severity of subsequent wildfires by an average of 16% and net smoke pollution by an average of 14%.” We urge the County to exercise its relationships with the Los Padres National Forest and County APCD to better support and promote strategic prescribed burns and other vegetative management. This would further reduce potential impacts to and community isolation of Cuyama, New Cuyama, and Ventucopa due to prolonged closures of Hwy 166 due to catastrophic wildfires and subsequent rockfall/landslides/mudslides/debris flows/flooding.

**EJ 4 Air Quality.** We are further concerned that as written, reference language in several of the objectives, including to the APCD and “other initiatives,” could undermine important efforts to maintain vital economic activities and advancement. We are concerned with this serving as the basis for a new regulatory mandate that would be detrimental to the community. Collaborative, grant-driven initiatives and flexibility to advance best practices can be helpful where feasible, but additional layers of regulations can be detrimental to implementing best practices that can benefit local jobs and the broader community. We encourage this section to be rewritten to remove new local regulatory mandates above and beyond what is already required by the APCD and State.

**EJ 5 Pollution Sources.** We encourage the Draft to add language to utilize the County’s role in Land Use decisions, annexations, service boundaries, and others (including annexation taxation agreements, representation on LAFCO, etc.) to promote good land use planning to reduce induction of growth of unrelated residential, sensitive sites, and parks and recreation into existing economic areas. We further oppose outright prohibition of “hazardous” facilities (EJ 5.2): for example, in the Mapping Methodology, several schools and local special districts appeared as CalEPA Regulated Sites.

We are concerned that EJ 6.1 is overly prescriptive and does not allow for consideration of the individual facts and circumstances of a situation. We believe it should be removed and the intent can be captured through other implementing mechanisms.

We ask that EJ 6.2 be deleted in its current form and framed more productively using the following language from the CA Department of Pesticide Regulation (DPR): “EJ 6.2. **Protecting People and the Environment.** Pest management is critical to support the health and resiliency of our food supply and agricultural sector and to protect public health, the environment and our infrastructure. Support education and awareness about the current CA DPR and US EPA requirements for materials applications within the existing State and Federal regulatory framework.”

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<sup>1</sup> <https://news.stanford.edu/stories/2025/06/controlled-prescribed-burns-wildfire-intensity-smoke-pollution>

We are concerned that the current draft of Policy 7 goes well beyond the requirement and creates overly broad language as currently written. We encourage Policy 7 to be more succinct to fulfill the State mandate without creating additional burdens to the County and community. We believe the County's own departments, along with opportunities for public engagement, better accomplish the goal without creating a broad funding mandate with little oversight in 7.1. For EJ 7.3 Translation and Interpretation, we urge the County to use neutral translation and interpretation services provided by the County to improve accuracy and impartiality. EJ 7.4 should also capture the County's dedication to advancement of economic opportunity, such as educational opportunities through Hancock and CTE, a business/entrepreneurial-friendly climate, access to rural broadband, flexibility in utility and energy choices, to address underlying factors that resulted in the communities being identified as EJs. We believe that EJ 7.5 is overly broad and better addressed through 7.8 and 7.9 and elsewhere and should be deleted. EJ 7.6 should also include calls for tools such as EnviroScreen 4.0 to better distinguish use from exposure and causation from correlation. We believe that Policies 7 and 9 miss the opportunity to partner with employers and other private sector organizations to advance economic opportunity and provide appropriate opportunities for outreach.

We believe there is an opportunity to commemorate the County's exceptional dedication to and leadership in disaster preparedness, response, and recovery in the document, perhaps under Policy 6 or 7.

Promoting infill development also results in revitalization (opportunities to add to Policies 5 and 8), and the County's role in streamlining the permitting process and facilitating timely and affordable construction to address diverse housing needs could be added to EJ 8.

Thank you again for the opportunity to provide these preliminary comments until we further refine our comments and engagement after additional review and dialogue with our members and leadership to best promote vibrant communities.

Sincerely,



Claire Wineman  
President