

TULARE COUNTY



ENVIRONMENTAL JUSTICE ELEMENT



Legislative Context

SB 1000 (Leyva)

- Date: 2016
- This legislation made EJ considerations mandatory in the General Plan, for all cities and counties in California with “disadvantaged communities.”
- Government Code 65302(h)

SB 115 + AB 1553

- Dates: 1999 & 2001
- Established a formal EJ definition, designated OPR as the coordinating agency for State EJ programs, and required OPR to develop EJ guidance for General Plans.

SB 535 + AB 1550

- Dates: 2012 & 2016
- Requires 25% funds from Greenhouse Gas Reduction Fund for “disadvantaged communities” and for projects located specifically in those communities, in order to improve public health and quality of life.

AB 617

- Date: 2017
- This legislation reduces air pollution in communities disproportionately and most impacted by poor air quality through specific community emission reduction plans, programs and air quality monitoring.

AB 1628

- Date: 2019
- This legislation revised California's EJ definition to add “meaningful engagement” of people of all races, cultures, incomes, and national origins.

Planning Process

Phase 1 components of the EJ Element

- Baseline research
- Scoping of existing EJ policies
- Limited policy development
- Strategic public engagement (e.g., an EJ Advisory Committee)

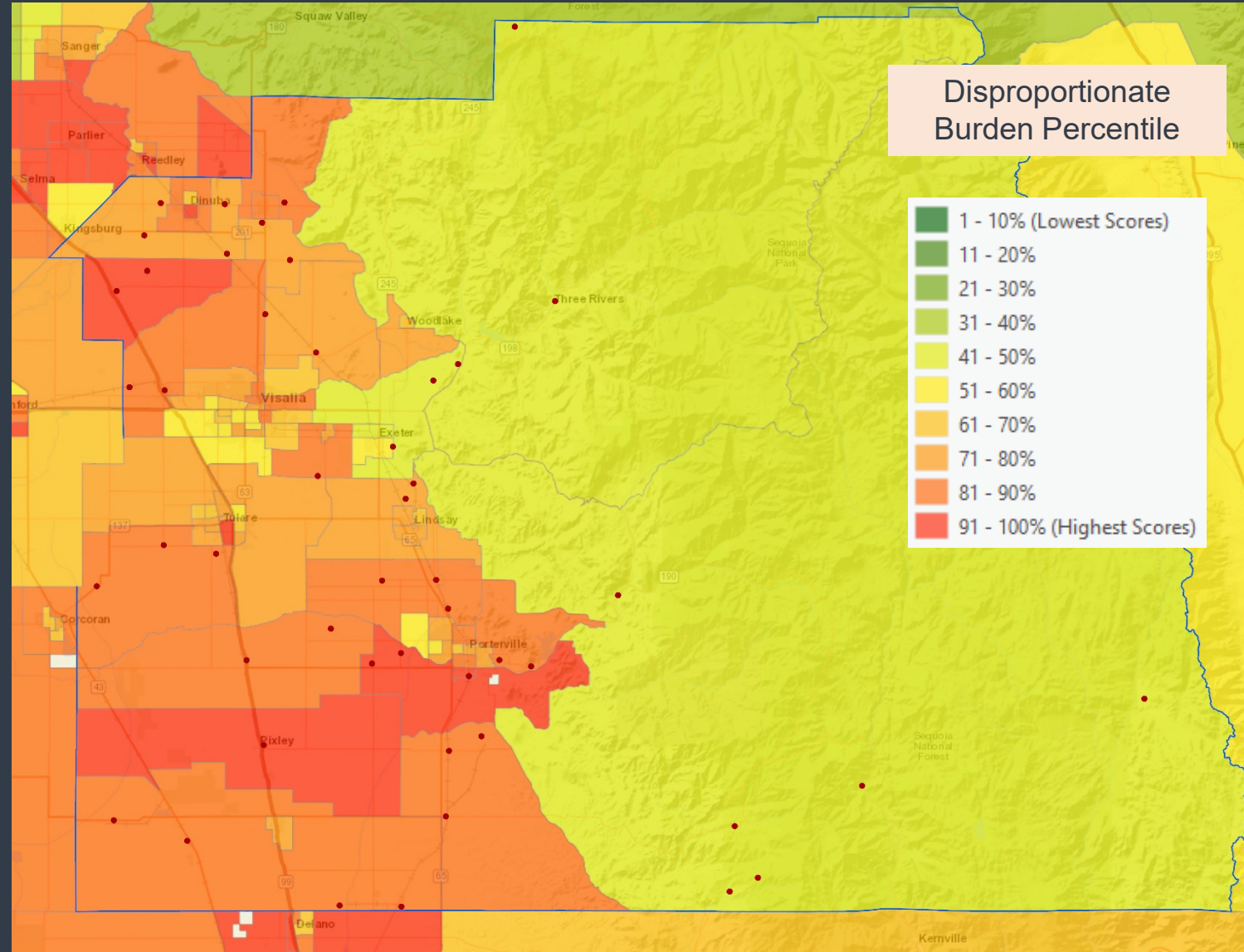


Source: CEJA

CalEnviroScreen 3.0

Indicators

- Exposure
 - Air quality
 - Toxic releases
 - Diesel PM
 - Pesticides
- Environmental effects
 - Clean up sites
 - Hazardous / solid waste sites
- Sensitive populations
 - Asthma
 - Cardiovascular Disease
 - Low Birth Weight Infants
- Socioeconomic factors
 - Poverty
 - Linguistic isolation
 - Education attainment
 - Unemployment



Legal Requirements of SB 1000

General Plan EJ Policies must “reduce the unique or compounded health risks in disadvantaged communities” by addressing the following:

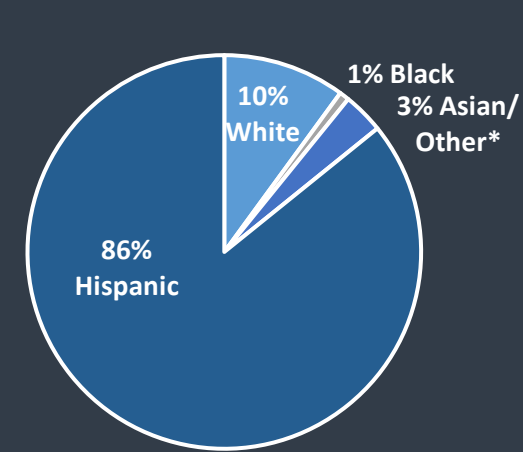
1. Reduce pollution exposure
2. Improve air quality
3. Promote public facilities
4. Promote food access
5. Promote safe and sanitary homes
6. Promote physical activity

SB 1000 (Leyva)

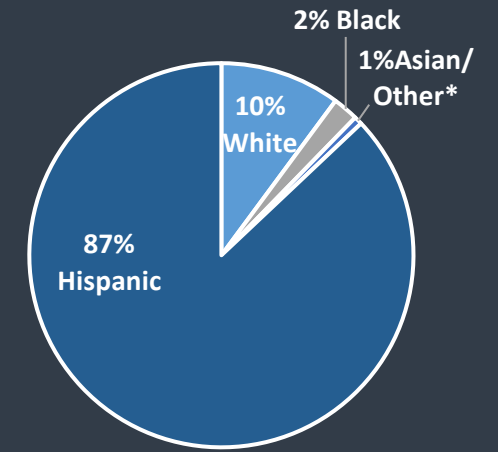
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EJ Community Demographics

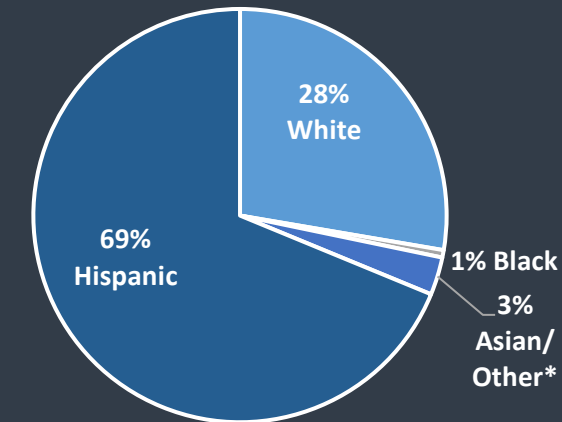
	Community		Hamlet		Valley	
	Estimate	MOE	Estimate	MOE	Estimate	MOE
Not Hispanic or Latino:	8,980	927	725	216	4,152	280
White alone	5,891	776	548	176	3,572	241
Black or African American alone	505	308	116	71	75	66
American Indian and Alaska Native alone	153	121	2	34	90	25
Asian alone	1,876	448	26	50	247	145
Native Hawaiian and Other Pacific Islander alone	44	78	0	36	18	132
Some other race alone	29	67	0	36	27	19
Hispanic or Latino:	53,806	2,325	4,687	968	8,747	761
Total	62,787		5,412		12,899	



Community Category, 2017 Share



Hamlet Category, 2017 Share



Valley Category, 2017 Share

		Community	Hamlet
18 to 24 years	Less than High School	1%	6%
	Some High School	4%	4%
	High School or Equivalent	8%	9%
	Some College	7%	4%
	College Diploma	0%	0%
	Completed Post-Secondary Degree	0%	0%
25 to 34 years	Less than High School	11%	4%
	Some High School	4%	4%
	High School or Equivalent	6%	7%
	Some College	5%	5%
	College Diploma	1%	1%
	Completed Post-Secondary Degree	0%	0%
35 to 44 years	Less than High School	6%	6%
	Some High School	4%	6%
	High School or Equivalent	5%	5%
	Some College	3%	5%
	College Diploma	1%	0%
	Completed Post-Secondary Degree	0%	0%
+45 years	Less than High School	20%	16%
	Some High School	5%	4%
	High School or Equivalent	7%	5%
	Some College	6%	8%
	College Diploma	1%	1%
	Completed Post-Secondary Degree	0%	1%

EJ Communities Education Attainment, 2017

Source: US Census; 2013-2017 American Community Survey 5-year Estimate

Population by Age Range	
Under 5 years	4.2%
18 years and older	88.0%
65 years and older	43.1%
Population by Race	
White	93.3%
Black or African American	0.0%
American Indian and Alaska Native alone	0.7%
Asian alone	2.6%
Native Hawaiian and Other Pacific Islander alone	0.0%
Some other race alone	1.8%
Two or more races	1.6%
Types of Languages Spoken	
English only	86.2%
Spanish	10.7%
Other Indo-European languages	1.3%
Asian and Pacific Islander languages	1.9%
Other languages	0.0%
Education Attainment	
High School or equivalent degree	31.5%
Some college, no degree	18.7%
Associate's degree	7.3%
Bachelor's degree	13.4%
Graduate or professional degree	12.6%
Median Income	\$ 46,529

Non-EJ Demographic Statistics, Averages, 2018

Source: US Census, 2018 American Community Survey 5-Year Estimate

Improvements and Programs that Address the needs of Environmental Justice Communities

- Community safety
- Medical care access
- Community sewer systems
- Local food markets
- Internet access
- Community resource centers
- Animal Control
- Natural Gas
- Green Spaces
- Public Transportation
- Active transportation
- Education levels and job requirements
- Unemployment
- Housing Affordability

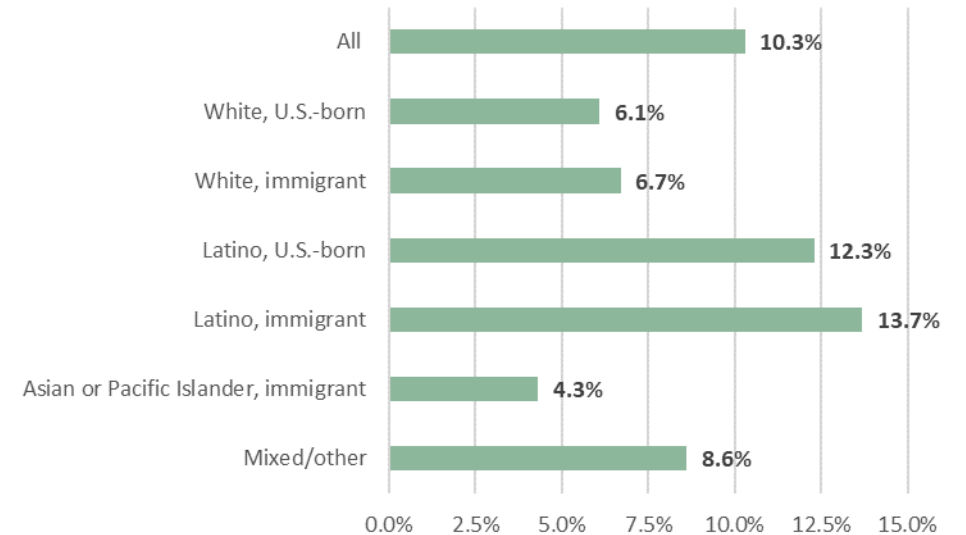


FIGURE 3.5 Unemployment rate by race/ethnicity and nativity: Visalia-Porterville, CA Metro Area, 2015

Source: National Equity Atlas

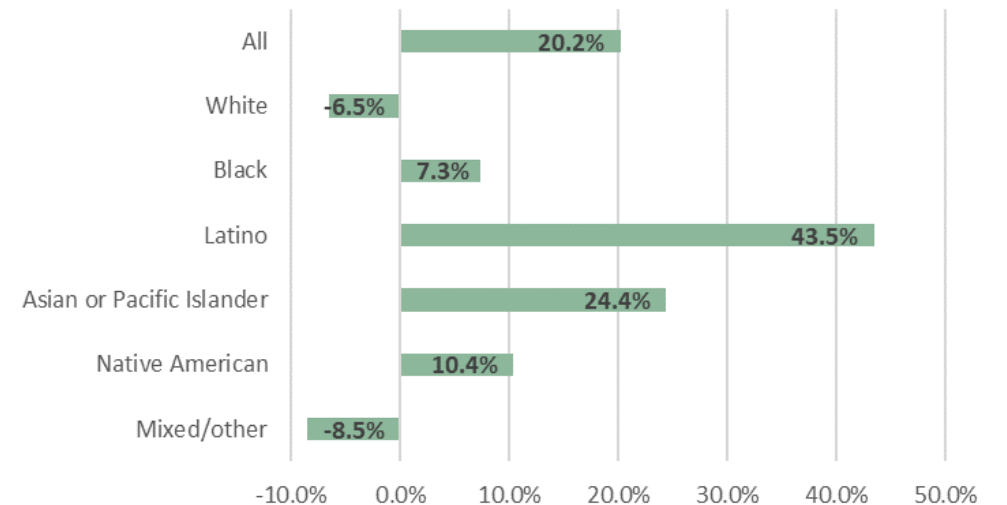


FIGURE Percent change in population: Visalia-Porterville, CA Metro Area, 2000-2010

Source: National Equity Atlas

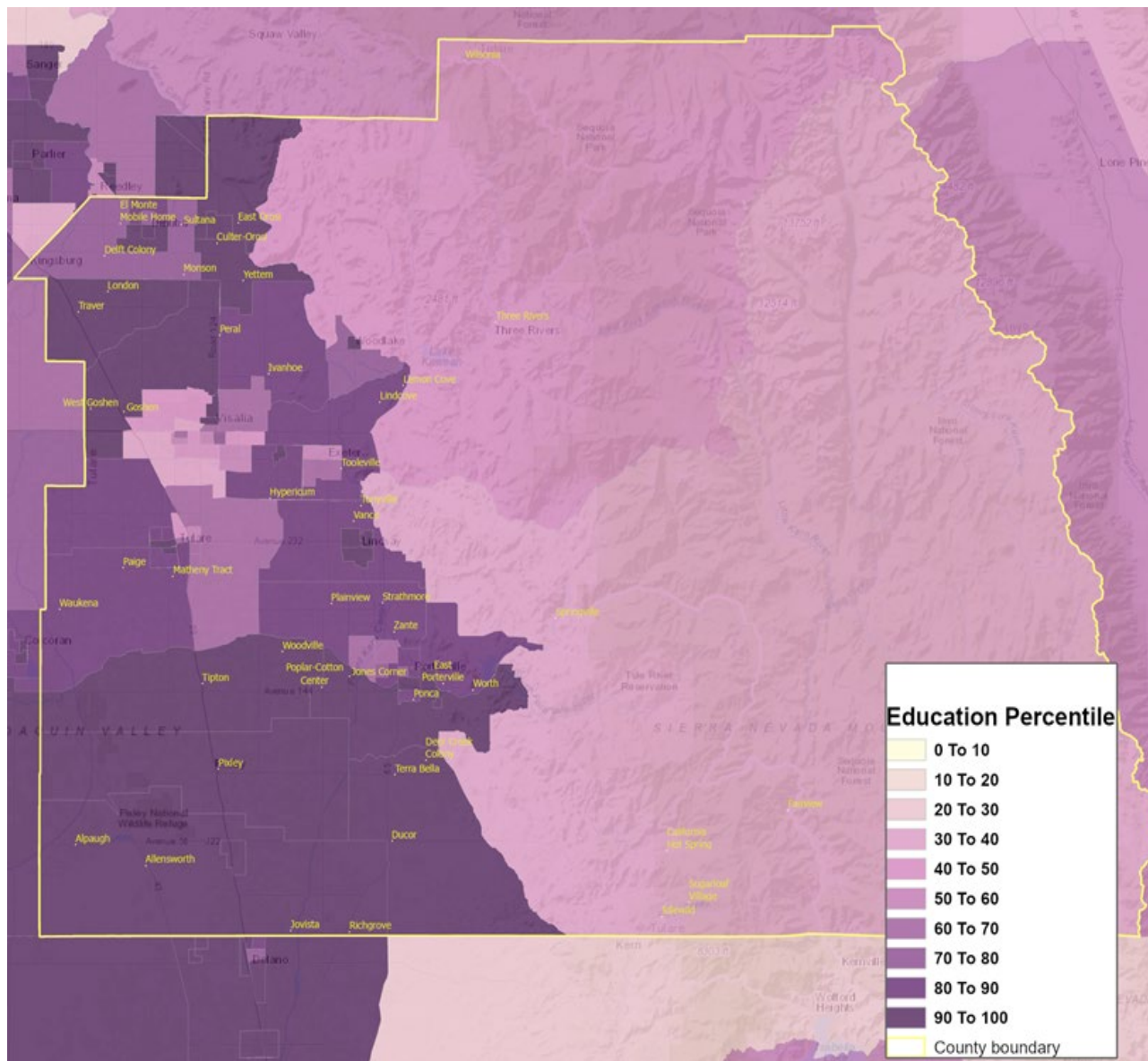


FIGURE Education Attainment
Source: CalEnviroScreen 3.0

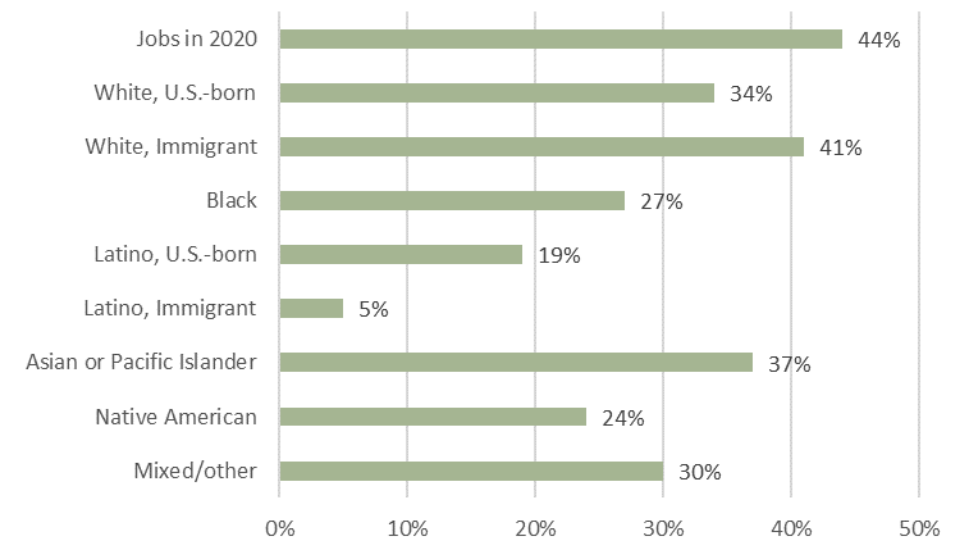
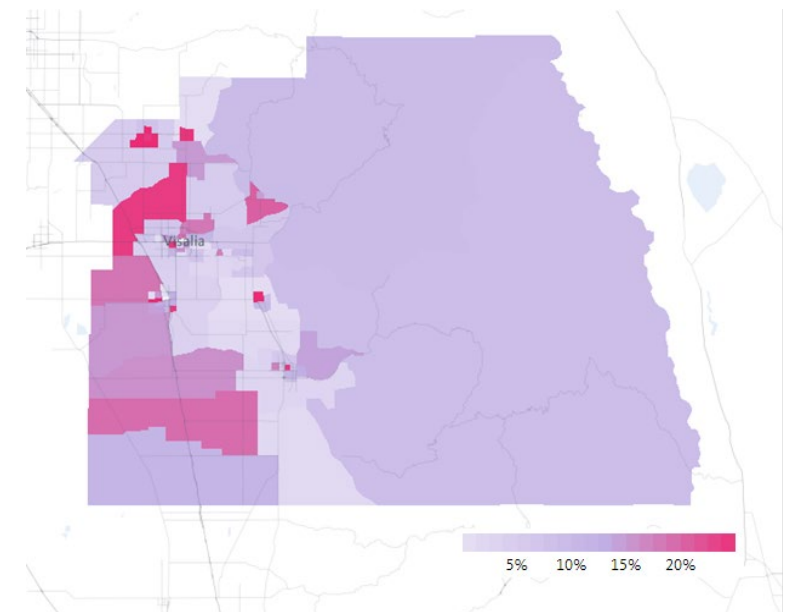


FIGURE Education attainment and projected state/national-level job education requirements by race/ethnicity and nativity: Visalia-Porterville, CA Metro Area, AA degree or higher, 2015

Source: National Equity Atlas



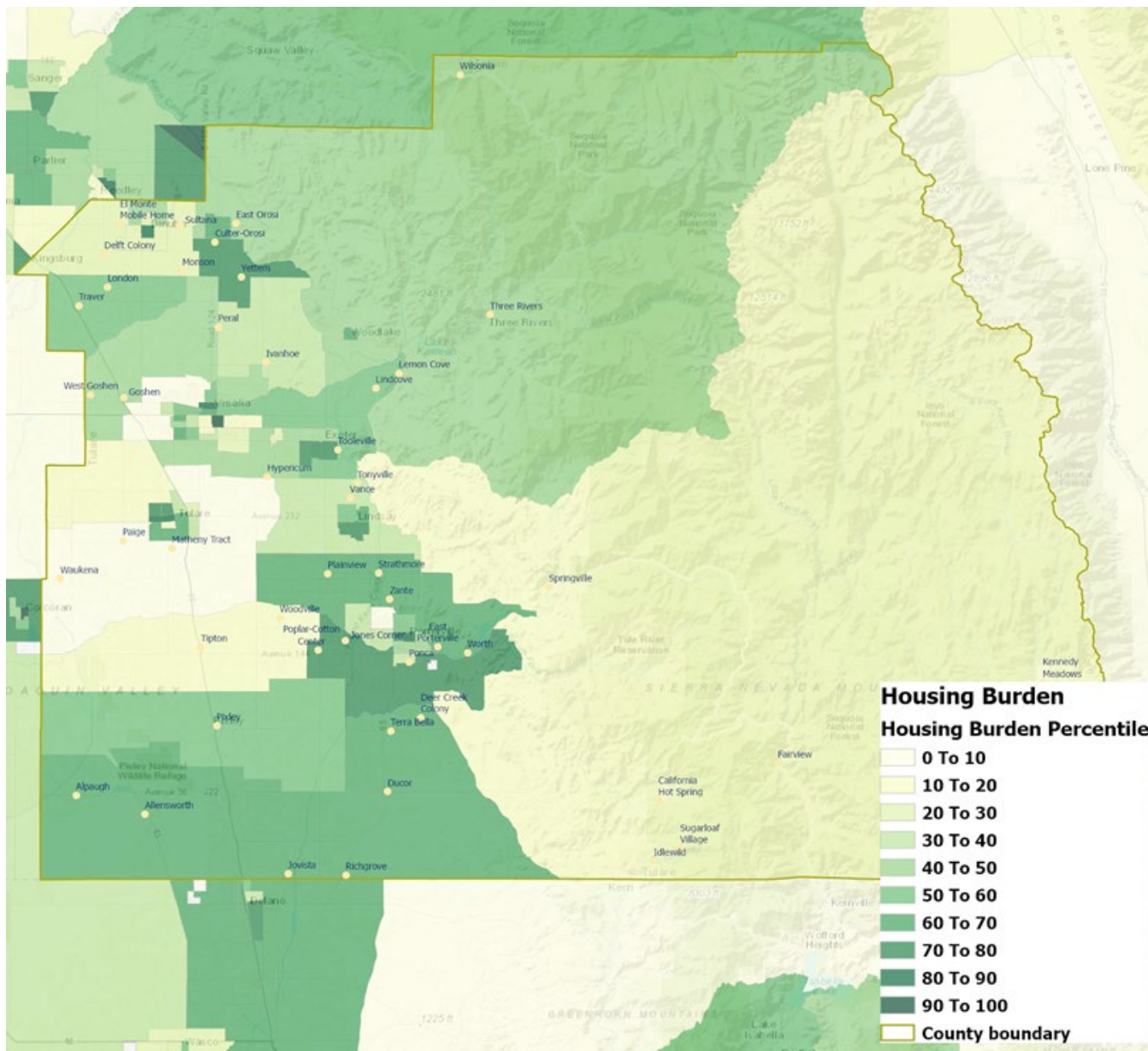


FIGURE Housing Burden by Census Tract

Source: CalEnviroScreen 3.0

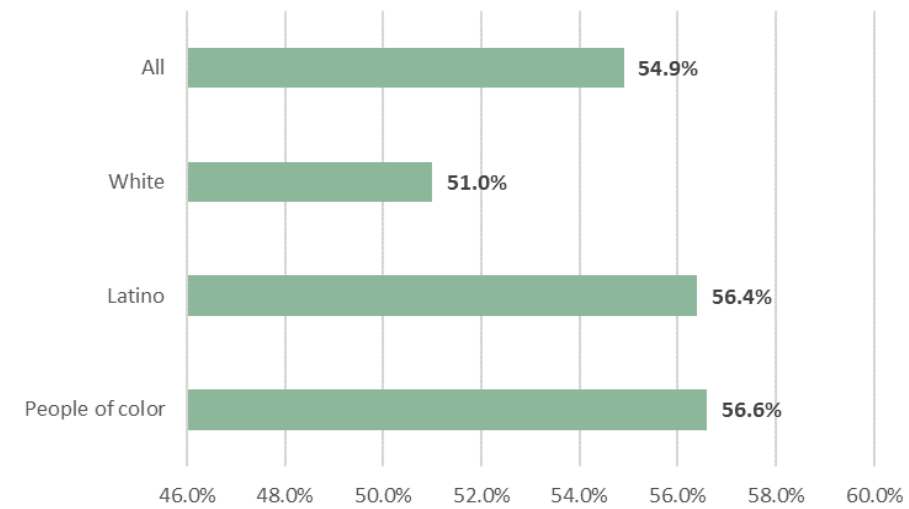


FIGURE Housing burden by tenure and race/ethnicity: Visalia-Porterville, CA Metro Area, Renter, 2015

Source: National Equity Atlas

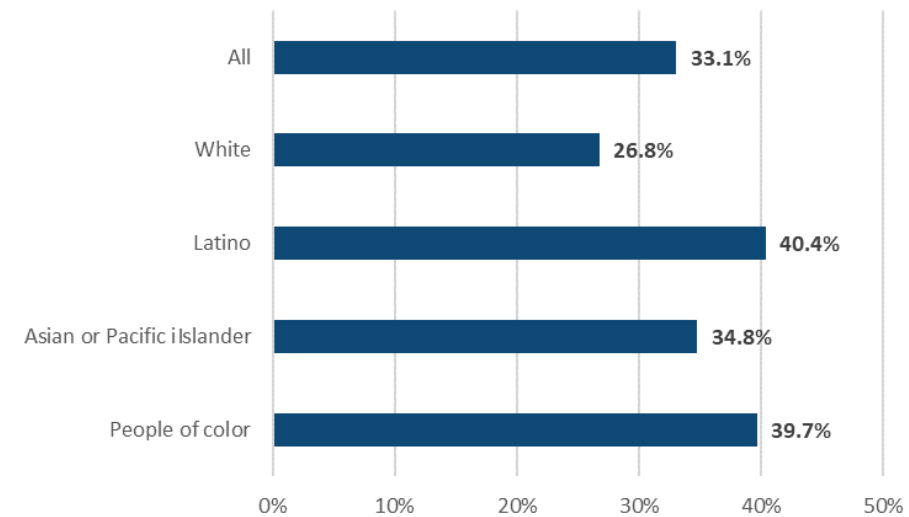


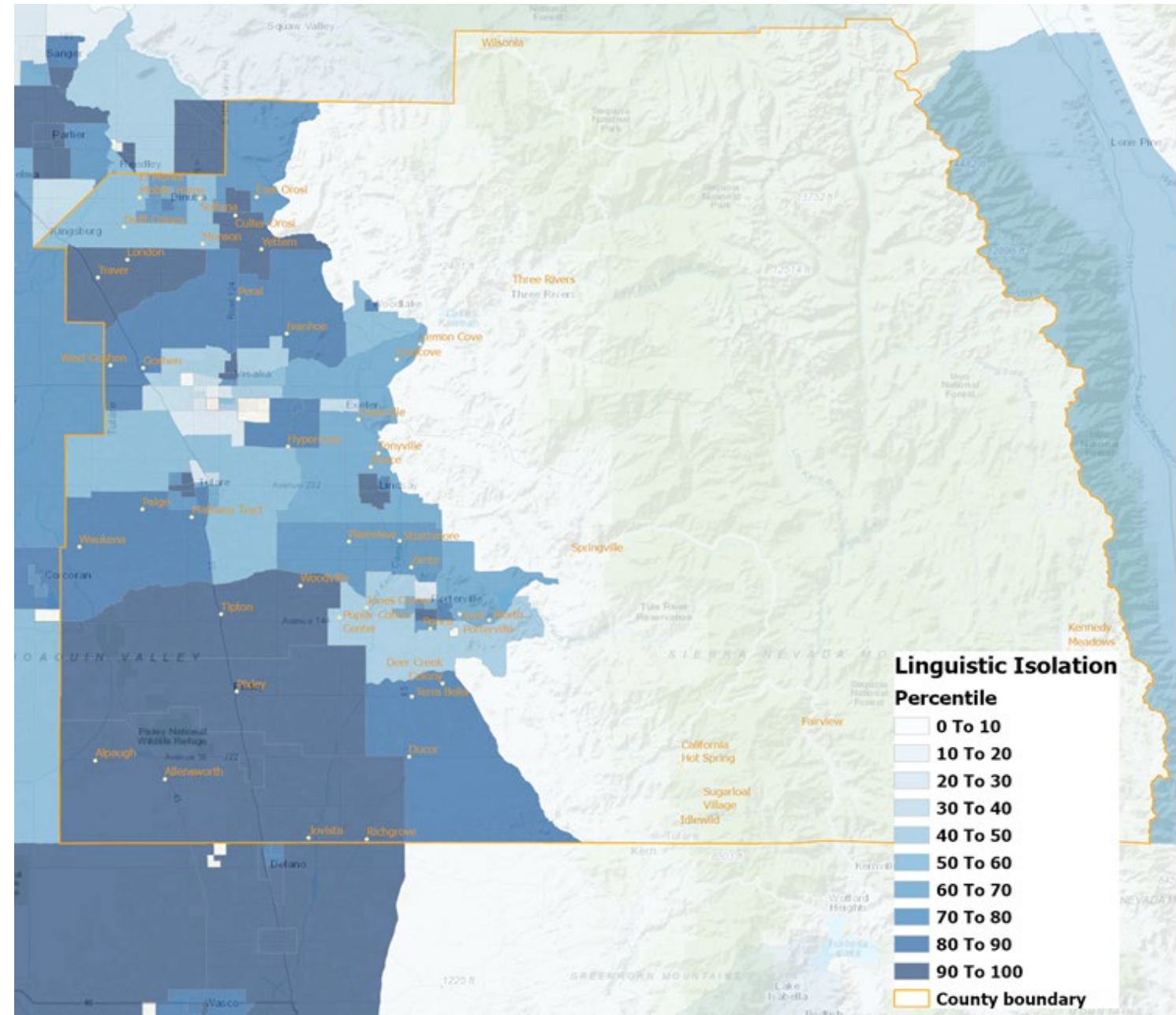
FIGURE Housing burden by tenure and race/ethnicity: Visalia-Porterville, CA Metro Area, Owners, 2015

Source: National Equity Atlas

Civil Engagement

The Tulare County EJ Advisory Committee is developing the following:

- EJ Advisory Committee Charter
- Public engagement objectives and measures of implementation
- EJ ombudsman



Language	Households with limited English	Total Households
English	0	63,097
Other and unspecified languages	0	36
Other Indo-European languages	344	1,787
Russian, Polish, or other Slavic languages	0	68
German or other West Germanic languages	0	701
French, Haitian, or Cajun	0	213
Arabic	252	488
Other Asian and Pacific Island languages	622	1,664
Vietnamese	40	547
Tagalog (incl. Filipino)	241	999
Chinese (incl. Mandarin, Cantonese)	290	877
Spanish	21,579	65,171
Total Households	23,368	135,648

TABLE Households with Limited English by Language Spoken, 2016

Source: Tulare County, Health and Human Services Agency

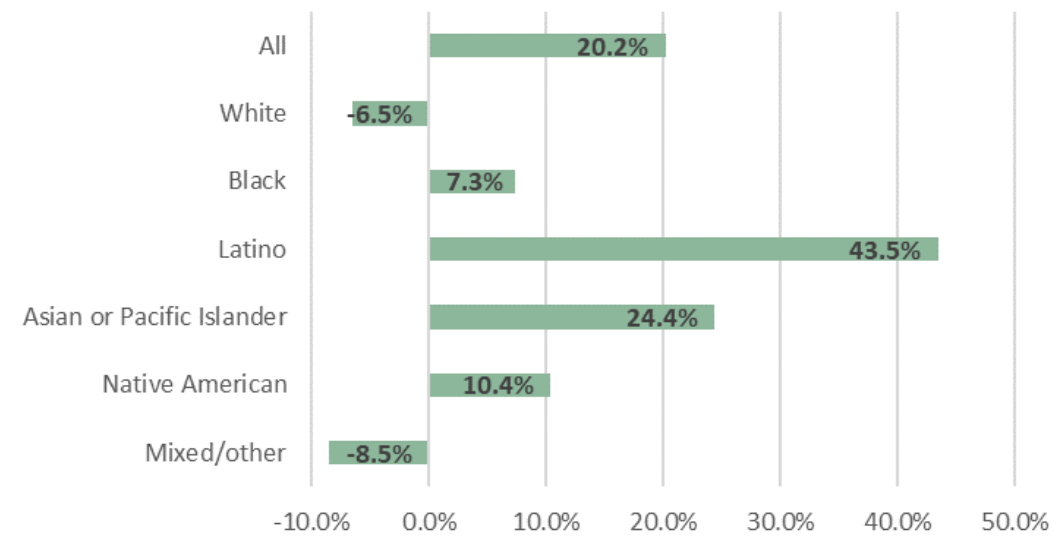


FIGURE Percent change in population: Visalia-Porterville, CA Metro Area, 2000-2010

Source: National Equity Atlas

Crime Prevention

Crime prevention through environmental design (CPTED): Promoting other Environmental Justice Goals

- Natural surveillance
- Natural access control
- Territorial reinforcement
- Maintenance and management

FIGURE Exposure-disease Paradigm

Source: Environmental Health Disparities: A Framework Integrating Psychosocial and Environmental Concepts, by Gee (et.al), Environ Health Perspect.2004 December

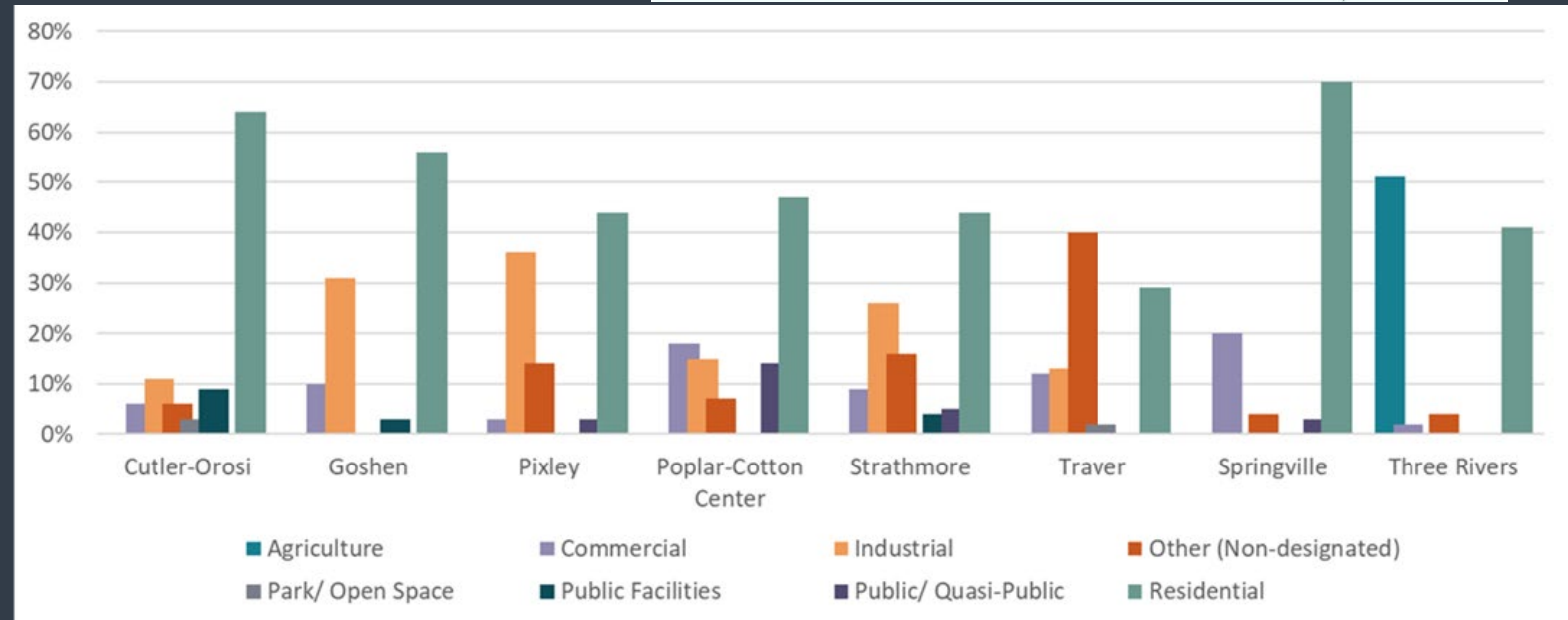
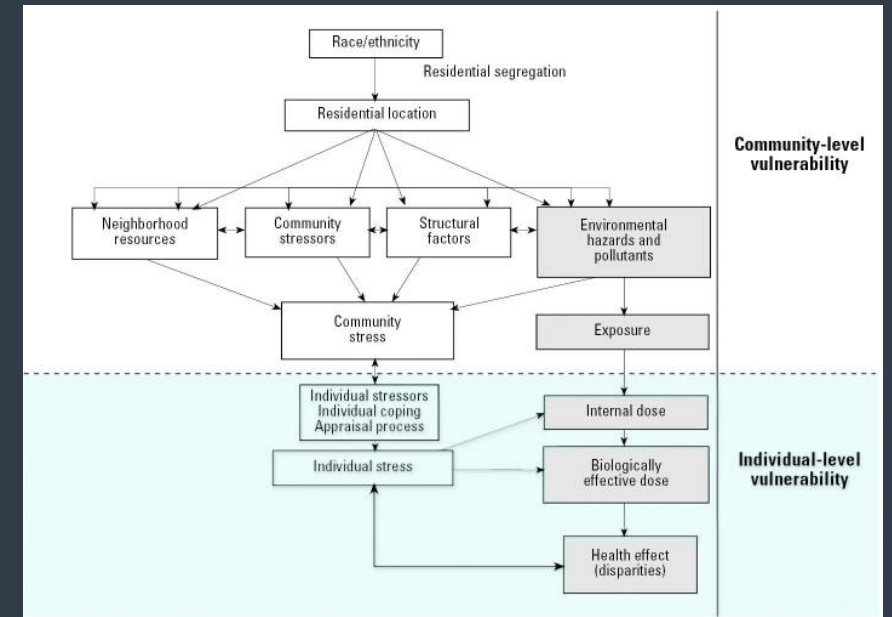


FIGURE Designated land use by community

Source: 2010 Tulare County Background Report

The Tulare County Community Health Assessment (2017):

- In 2014, in unincorporated Tulare County, approximately 9,800 crimes were committed, 2.48% gang related.
- In 2015, approximately 9,500 crimes were committed, 3.8% were gang related.

Needed improvements:

- Surveillance
- Street lighting
- Dispatch response time

	2016-2017	2018-2019	Change over time
Assault	1,207	1,144	-5%
Burglary	1,071	930	-13%
Commercial Vice	2	2	0%
Disorderly Conduct	540	423	-22%
Domestic Violence	702	734	5%
Drugs - Felony	527	612	16%
Drugs - Misdemeanor	814	666	-18%
Embezzlement	6	10	67%
Family Offenses	43	67	56%
Fraudulent Documents	152	137	-10%
Homicide	26	19	-27%
Morals	34	22	-35%
Other Felonies	1,098	1,257	14%
Other Misdemeanors	2,210	2,191	-1%
Rape	34	24	-29%
Robbery	92	89	-3%
Theft	1,775	1,828	3%

FIGURE Change over time for criminal activity in EJ communities by crime type

Source: Tulare County Sheriff's Department

	2016-2017	2018-2019	Change over time
Assault	79	80	1%
Burglary	101	89	-12%
Disorderly Conduct	47	38	-19%
Domestic Violence	69	55	-20%
Drugs - Felony	31	43	39%
Drugs - Misdemeanor	88	38	-57%
Embezzlement	3	1	-67%
Family Offenses	12	8	-33%
Fraudulent Documents	12	11	-8%
Homicide	5	1	-80%
Morals	41	3	-93%
Other Felonies	118	83	-30%
Other Misdemeanors	92	186	102%
Rape	2	6	200%
Robbery	76	3	-96%
Theft	68	164	141%

Figure Change over time for criminal activity in non-EJ communities by crime type

Source: Tulare County Sheriff's Department

EJ Communities

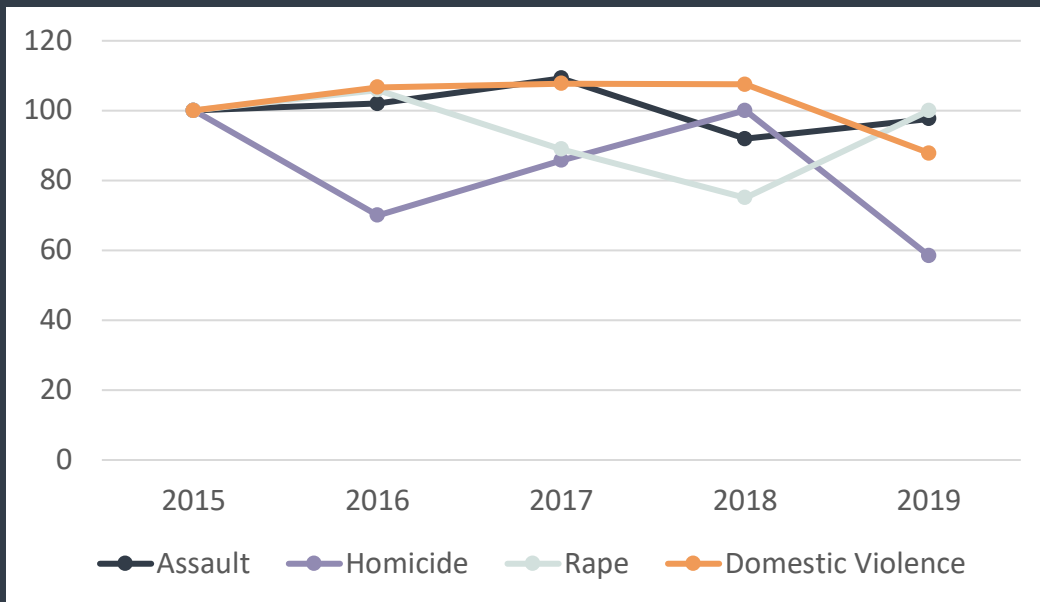


FIGURE Number of Personal Crimes per Year, Relative to 2015 (% Change)

Source: Tulare County Sheriff's Department

Non-EJ Communities

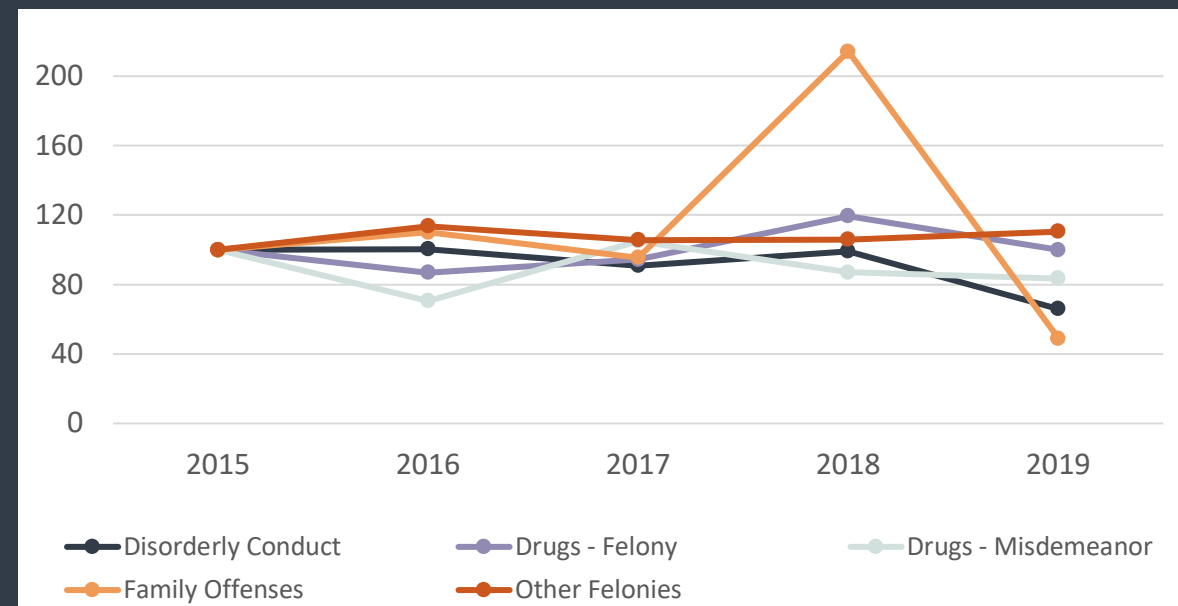
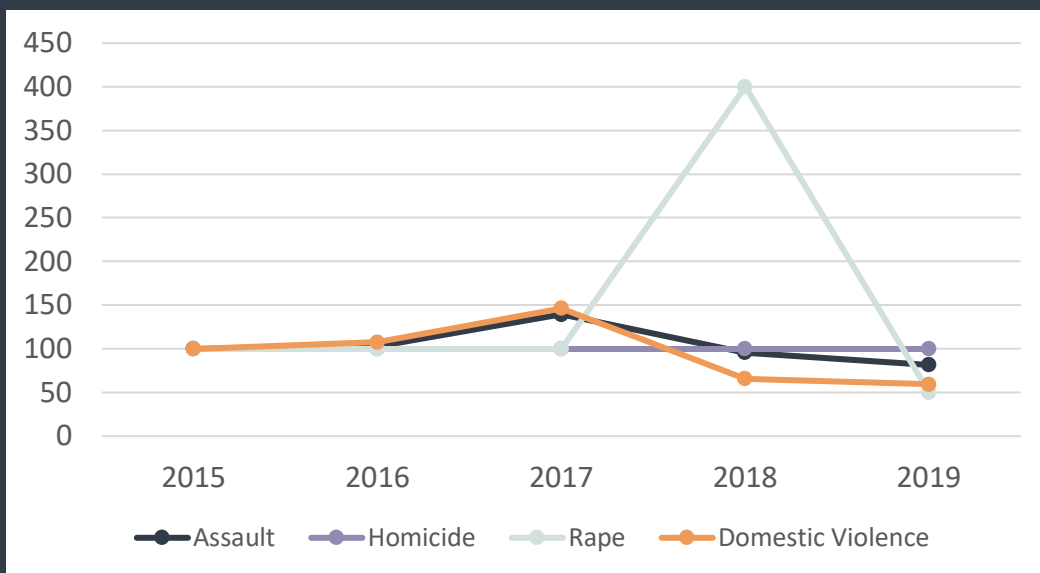
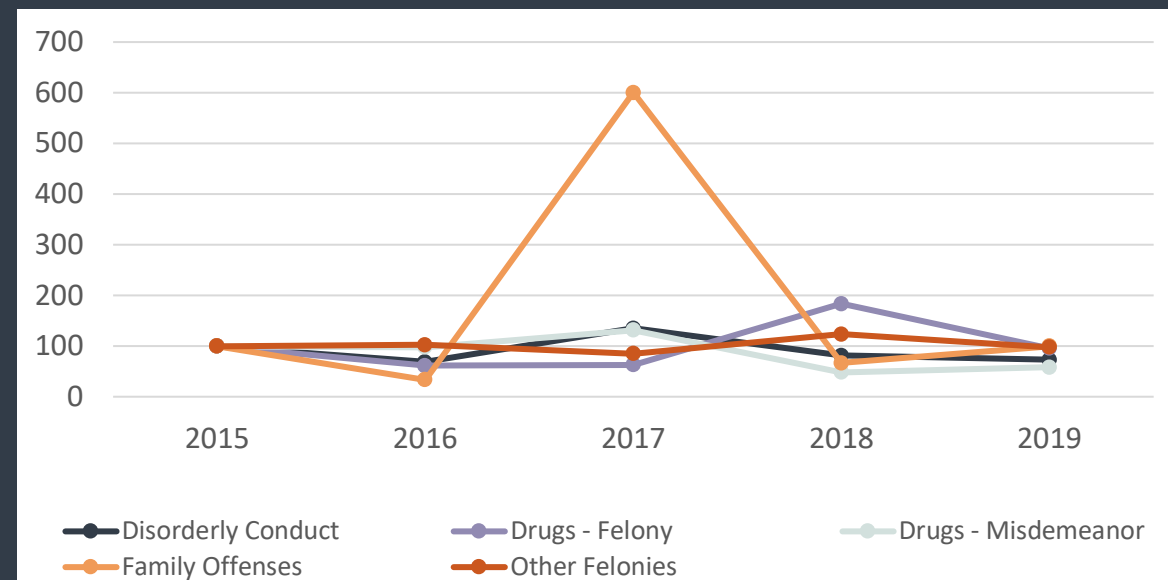


FIGURE Number of crimes with potential impact on household health, relative to 2015 (% Change)

Source: Tulare County Sheriff's Department



Healthy Food Access

Content

- Population increases
- SNAP and EBT
- Food distribution barriers
- Obstacles to healthy food
- Creating business partnerships between Community, Markets, and Farmers
- Accessibility and affordability

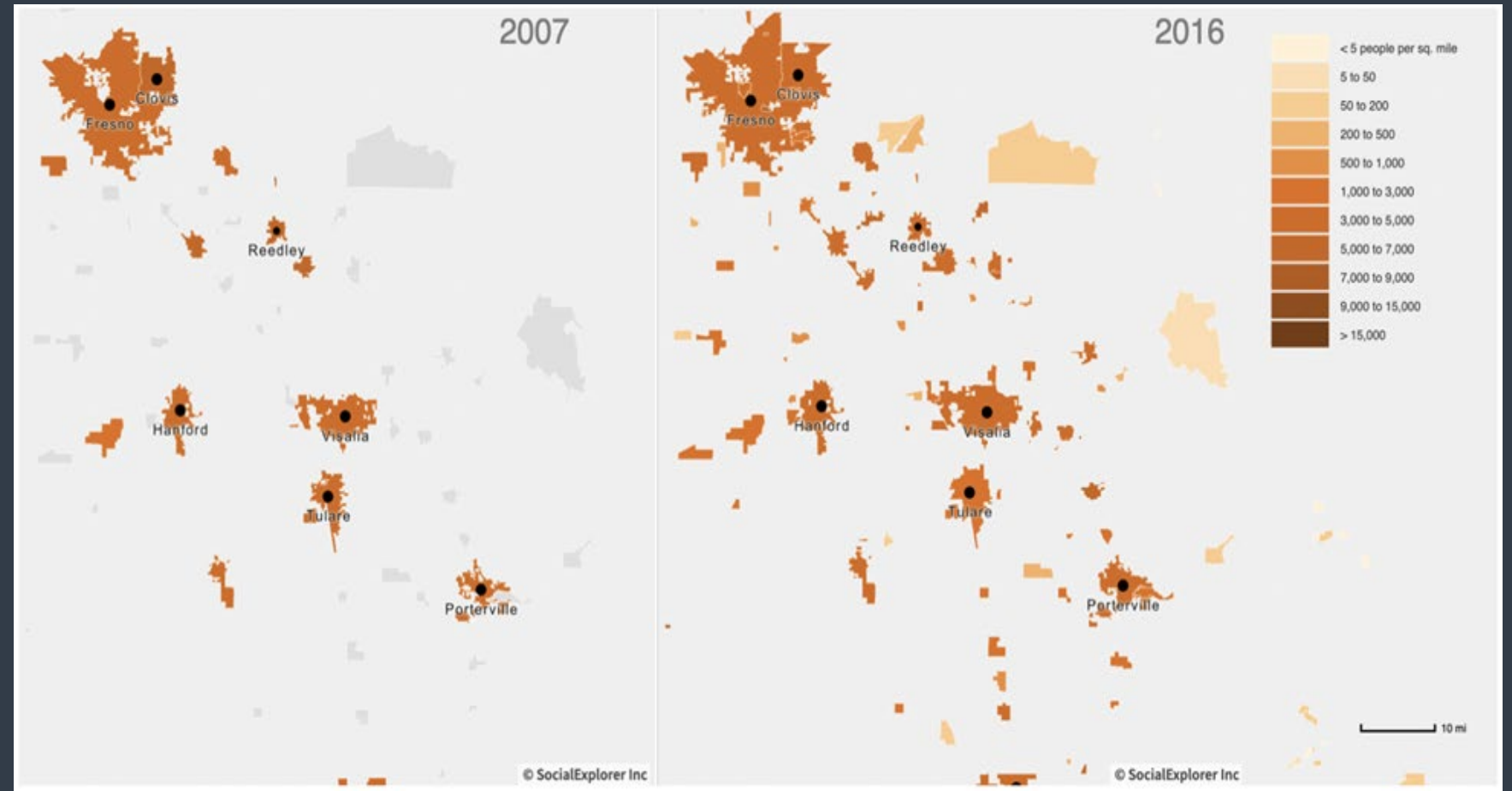


FIGURE Population density by census place

Source: Social Explorer, ACS 2007 (3-Year Estimate), ACS 2016 (5-Year Estimate)

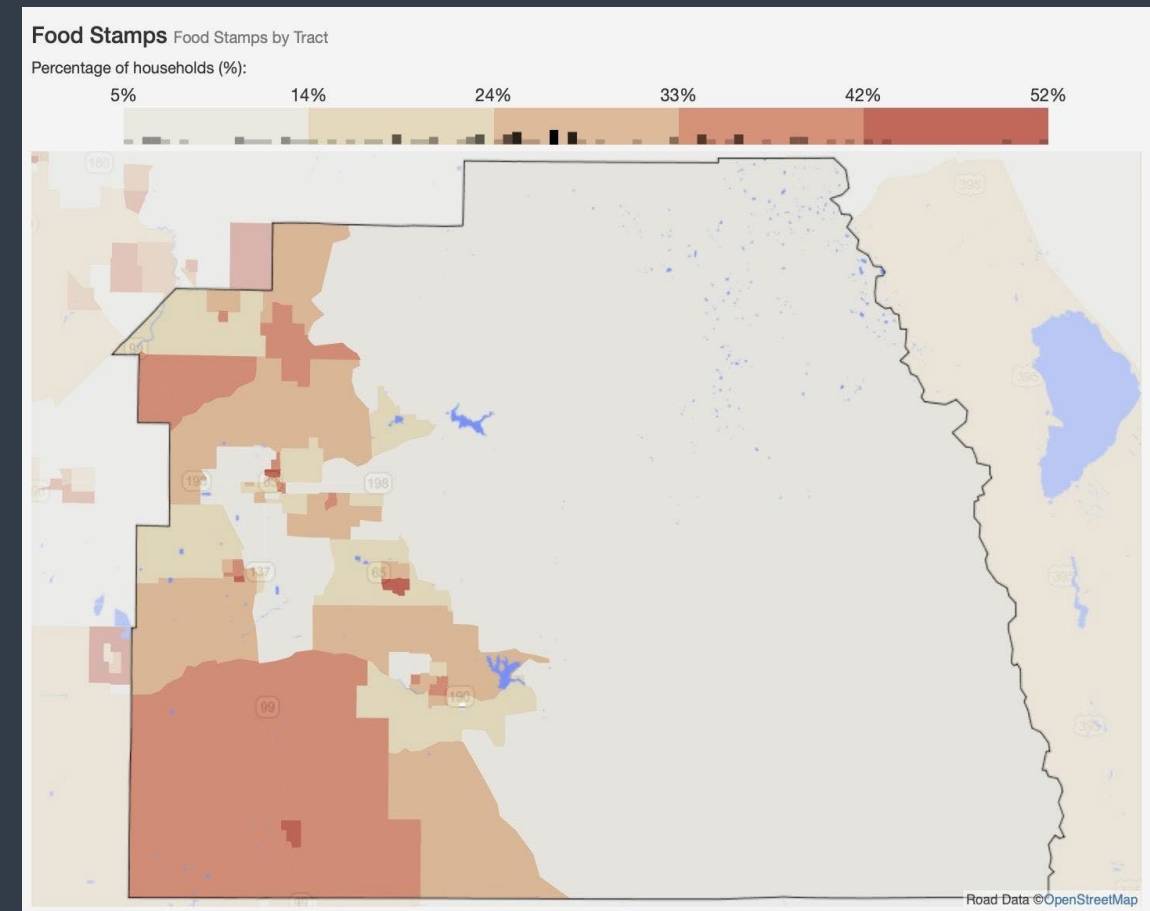
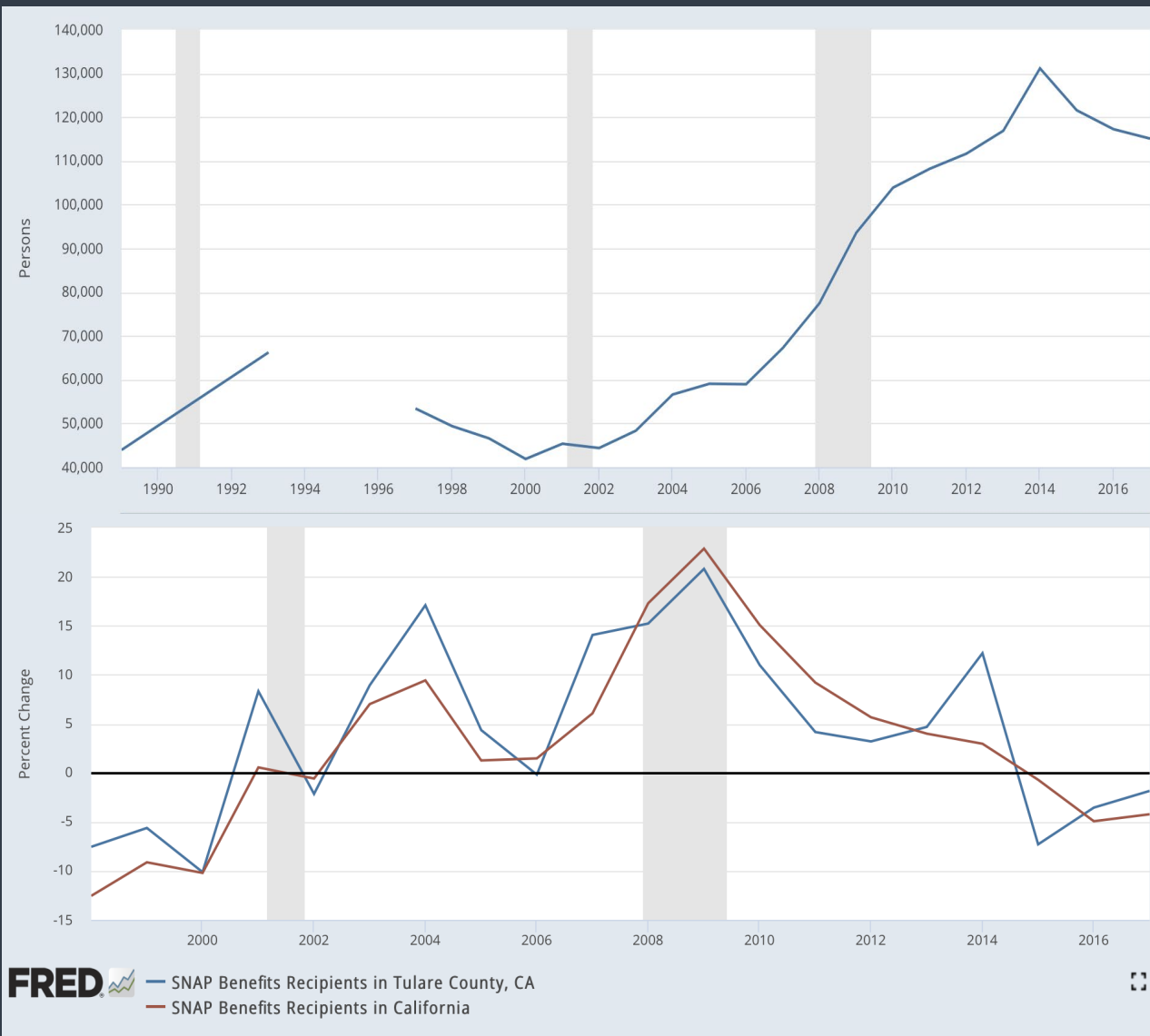
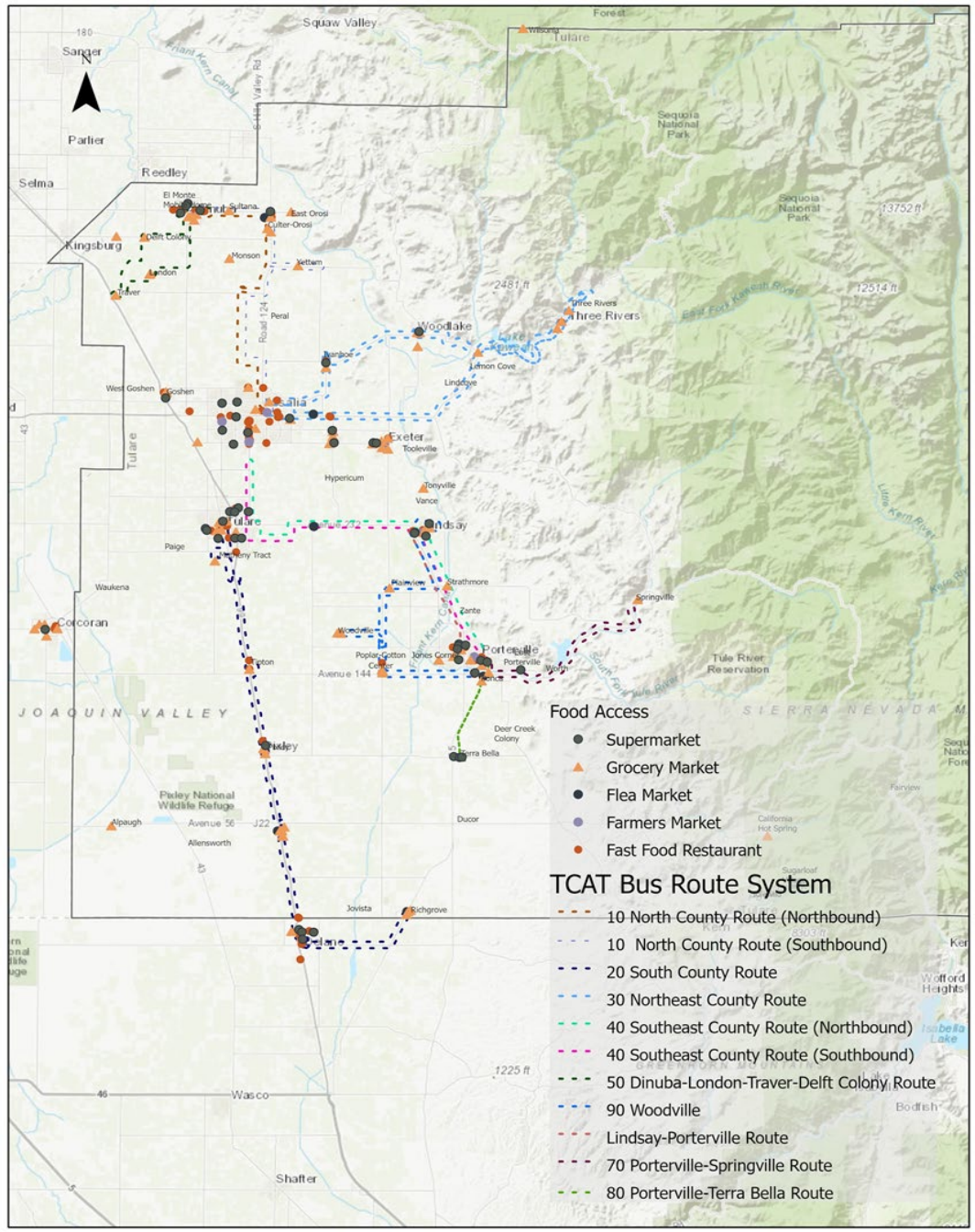


FIGURE Percentage of Households with SNAP Benefits 2016
Source: Statistical Atlas, 2010 US Census Bureau & ACS 2016 (4-Year Estimate)

FIGURE Healthy food access in Tulare County
Source: Tulare County, Planning and Economic Development Division



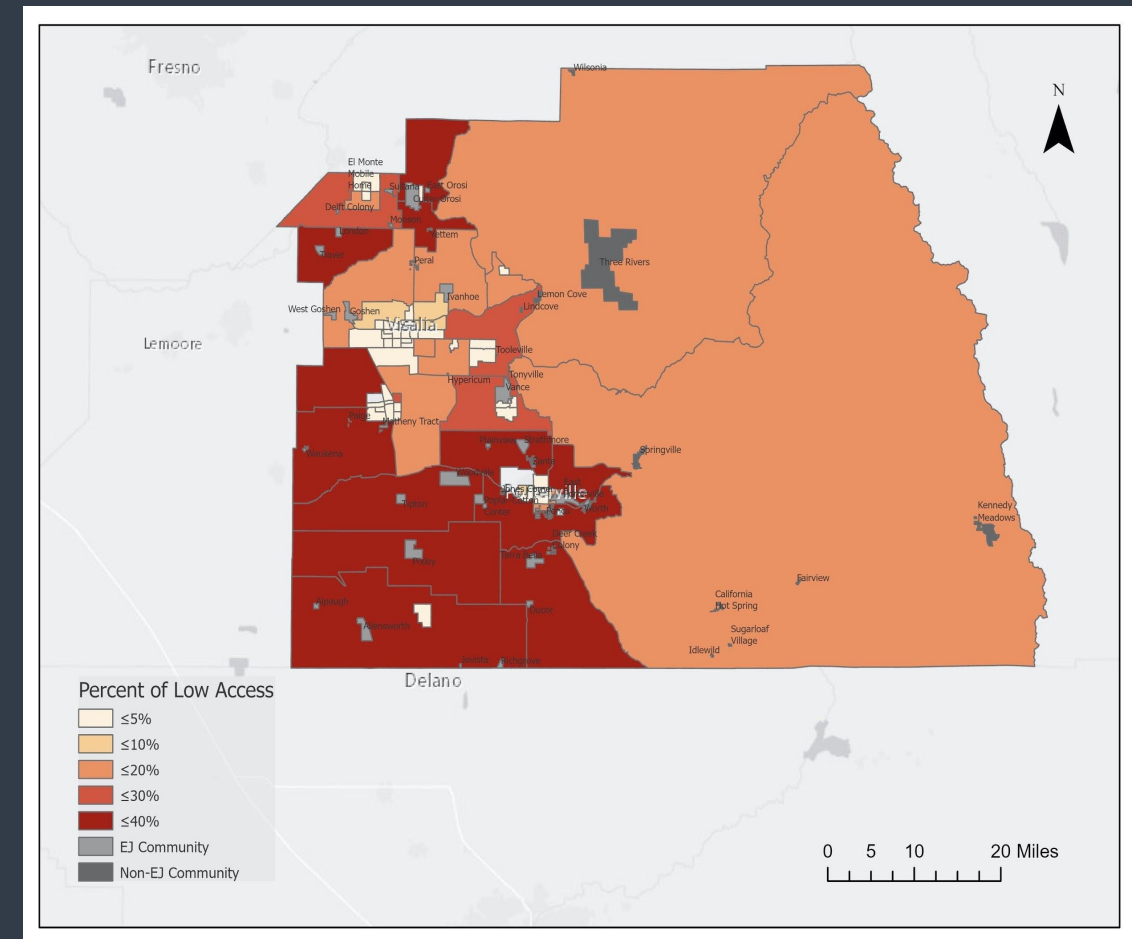
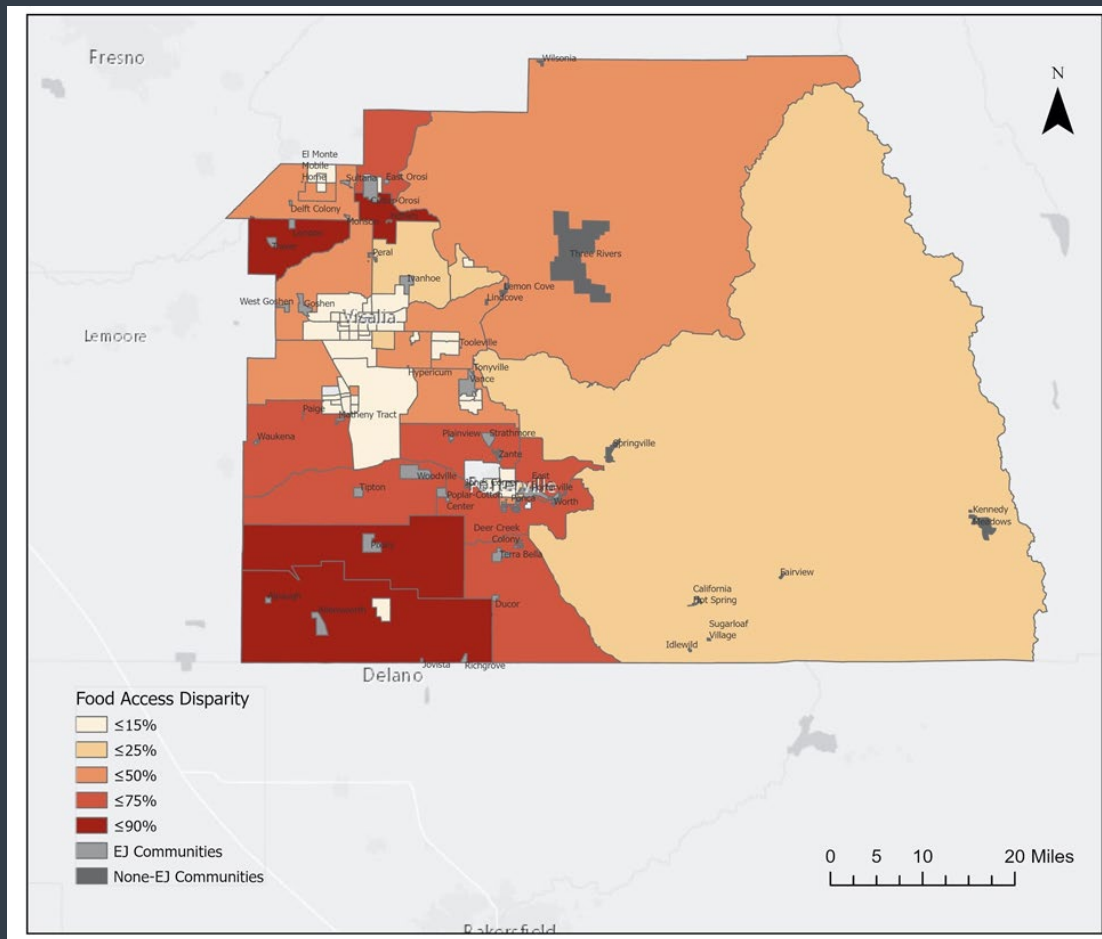


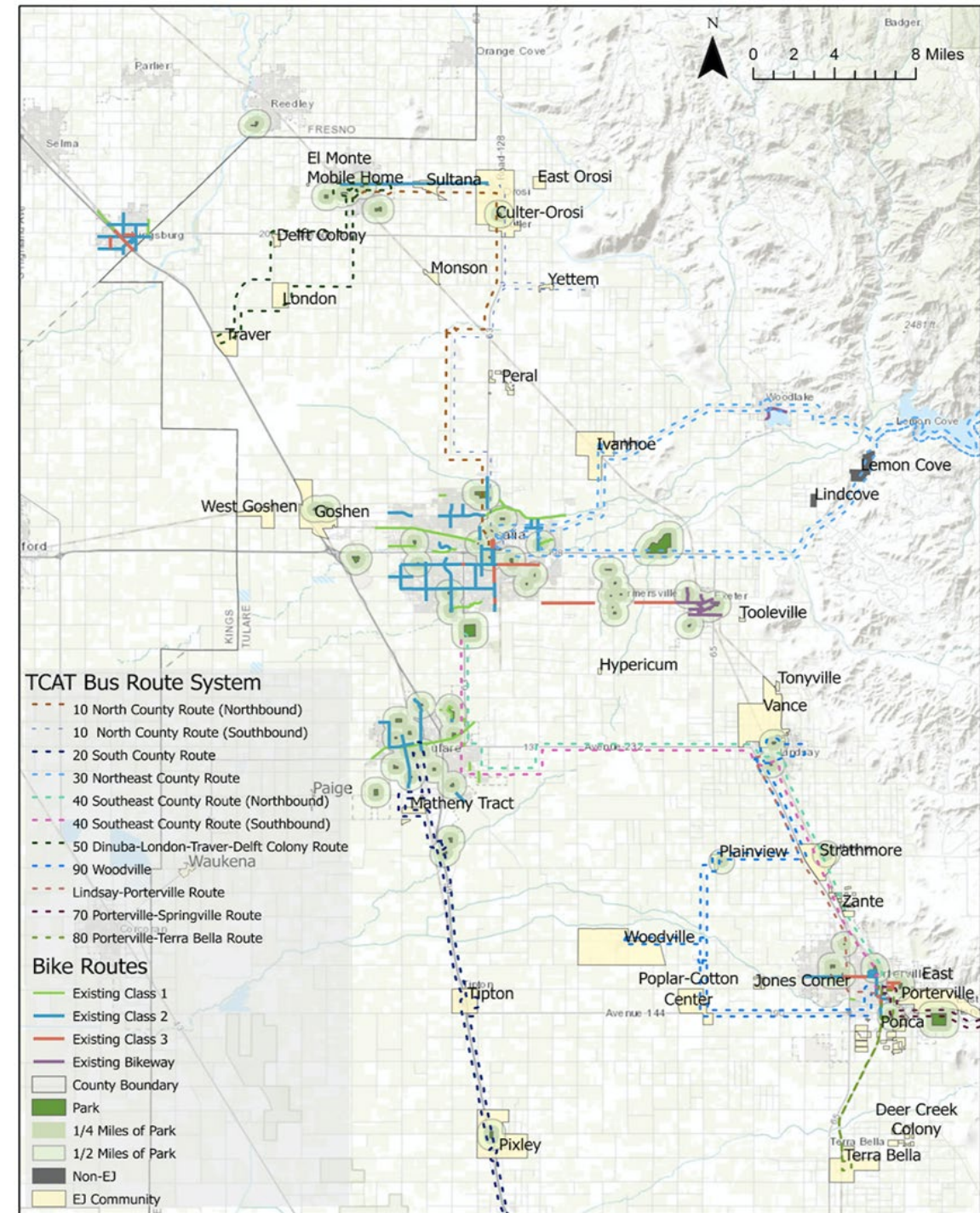
FIGURE 6.5 Low Access, low-income population within 1 mile of supermarket
Source: Food Research Atlas, 2015

FIGURE 6.6 Low access, children population within 1 mile of supermarket
Source: Food Research Atlas 2015

Physical Activity

Content:

- Promotion of physical activity through the built environment
- Accessibility
- Park acreage
- Complete streets
- Tree cover and greening & air quality



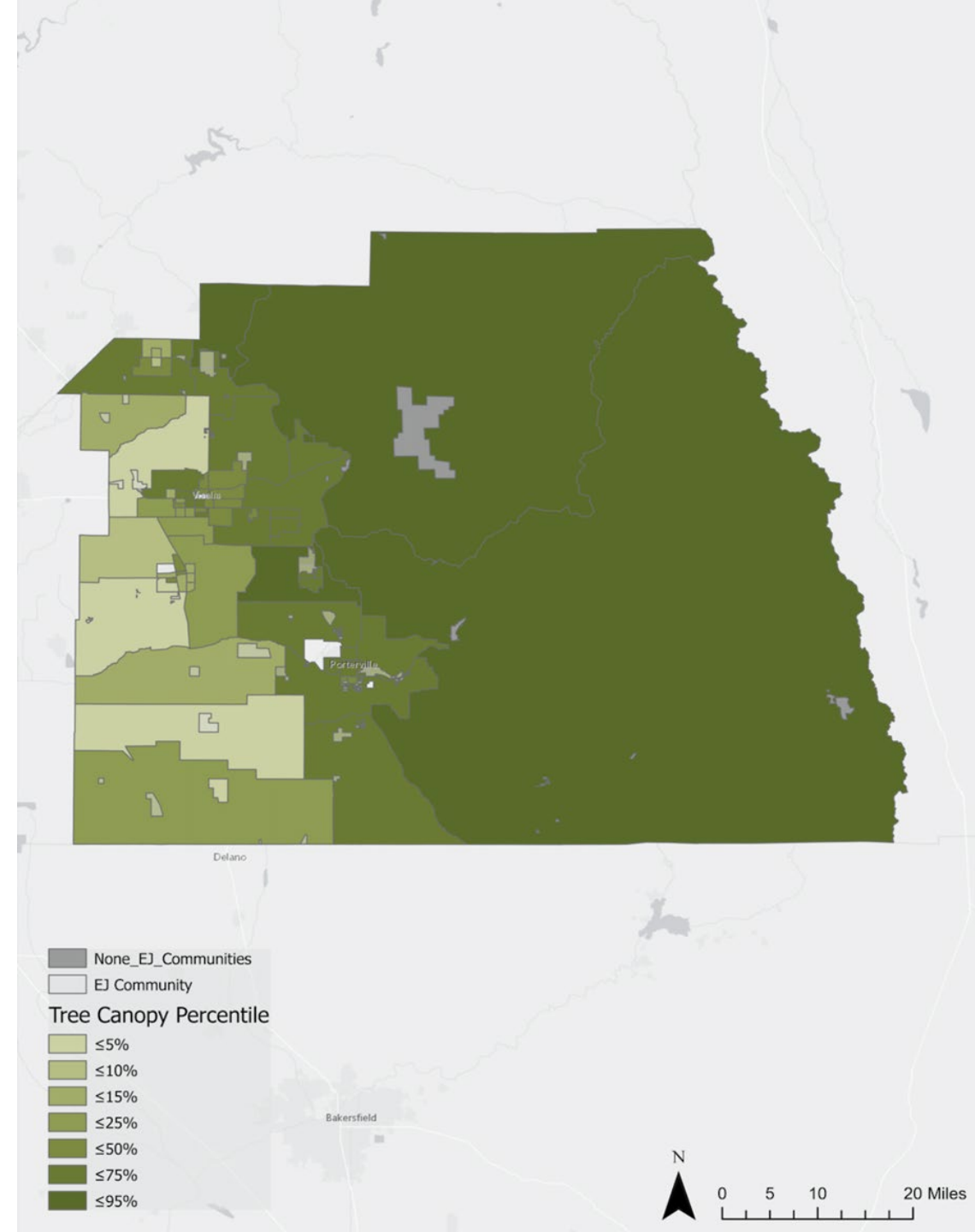
Baseline Conditions

- Walkability
- Climate change and Community resiliency
- Quality of life

Geography	Acres	Population	Acres per 1,000 residents
Tulare County Unincorporated	460	145,050	3.17
Visalia	132	130,231	1.01
Tulare	363	63,515	5.72
Porterville	295	60,070	4.91
Lindsay	52	12,960	4.01
Dinuba	80	24,657	3.24
Exeter	32.2	11,047	2.91
Farmersville - current	21.3	11,161	1.91
Farmersville (with new sports park, Phase 1)	47.3	11,161	4.24
Woodlake	10.9	7,648	1.43

TABLE Public park acres per population

Source: City and County Parks Department (2016), Tulare County Community Assessment Report (2017)



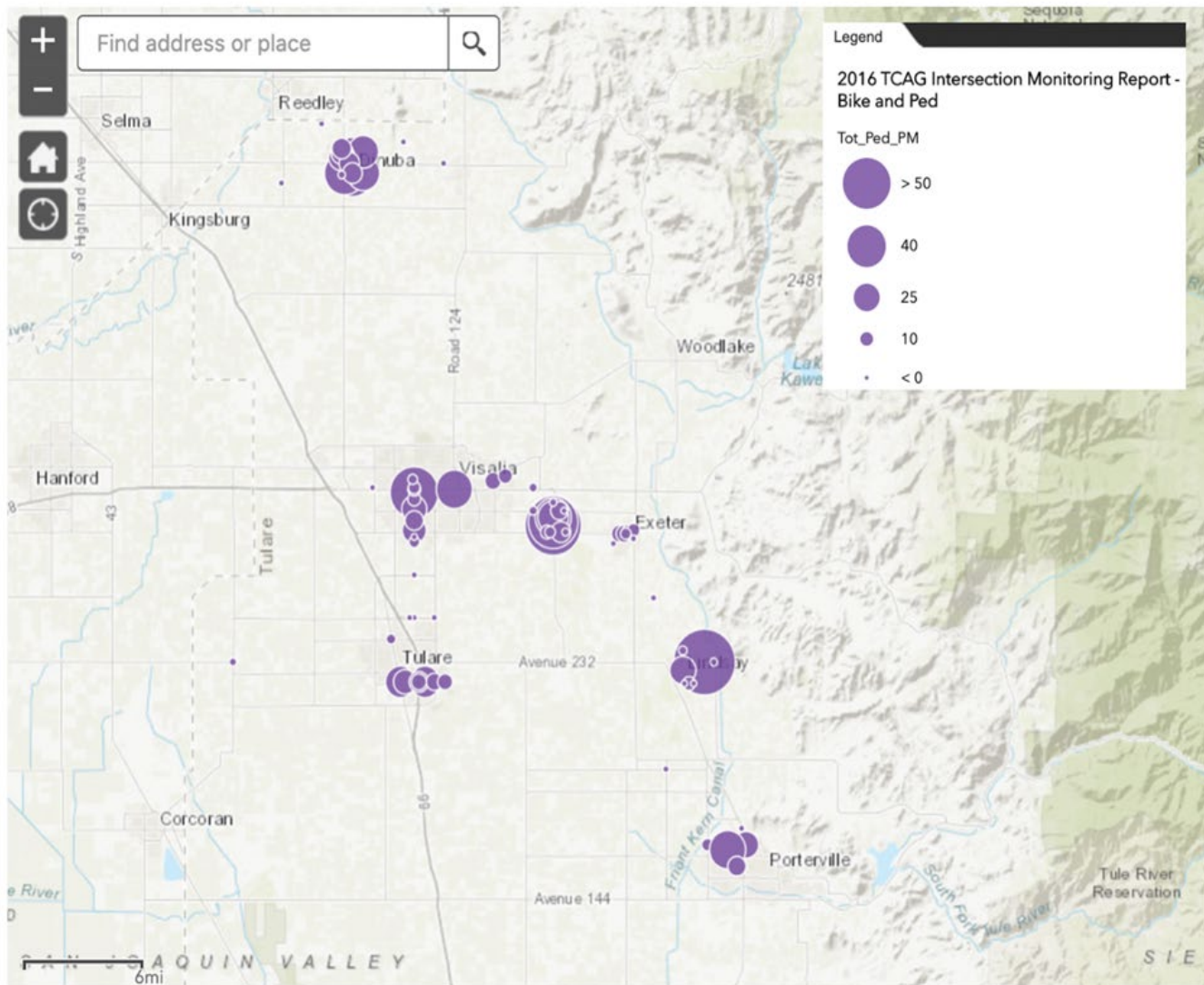


FIGURE Bike and pedestrian traffic, 2016

Source: Tulare County Association of Governments

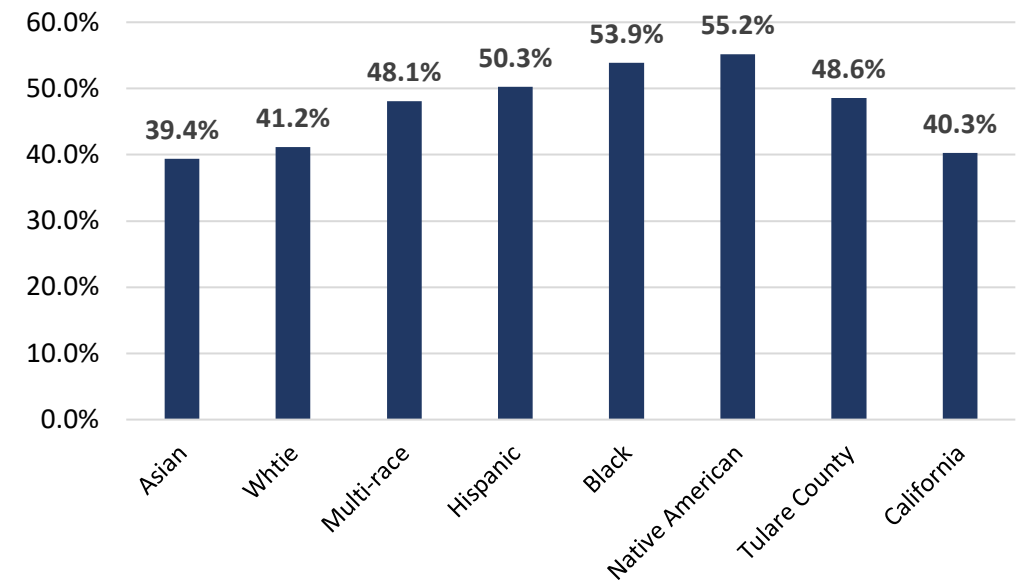


FIGURE 5TH grade students with an unhealthy weight, 2014-2015

Source: Community Health Assessment (2017), Health and Human Services Tulare County

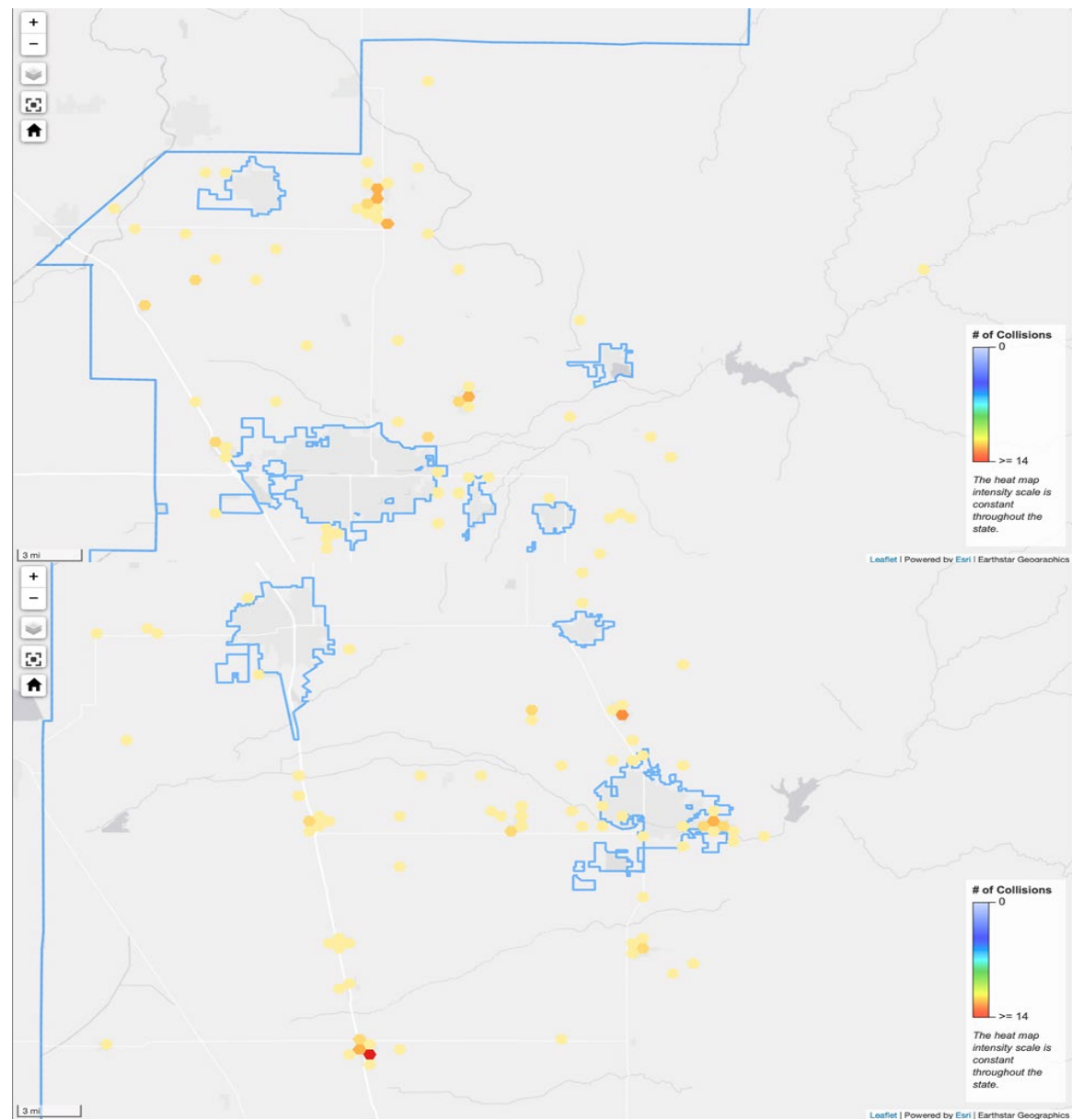


FIGURE Number of collisions in unincorporated Tulare County, 2008-2018
Source: The Transportation Injury Mapping System (TIMS), SafeTREC, UC Berkeley

Involved With	Fatal		Severe Injury		Visible Injury		Complaint of Pain		Total	
	2008-2013	2013-2018	2008-2013	2013-2018	2008-2013	2013-2018	2008-2013	2013-2018	2008-2013	2013-2018
Bicycle	3	5	10	6	30	26	10	7	53	44
Pedestrian	21	22	18	25	57	54	27	27	123	128

TABLE Number of collisions by collision severity, Tulare County unincorporated, 2008-2018
Source: The Transportation Injury Mapping System (TIMS), SafeTREC, UC Berkeley

Public Facilities

- Education institutions
- Libraries and cultural centers
- Community centers
- Access to health services
- Public services: sheriff and fire dept.

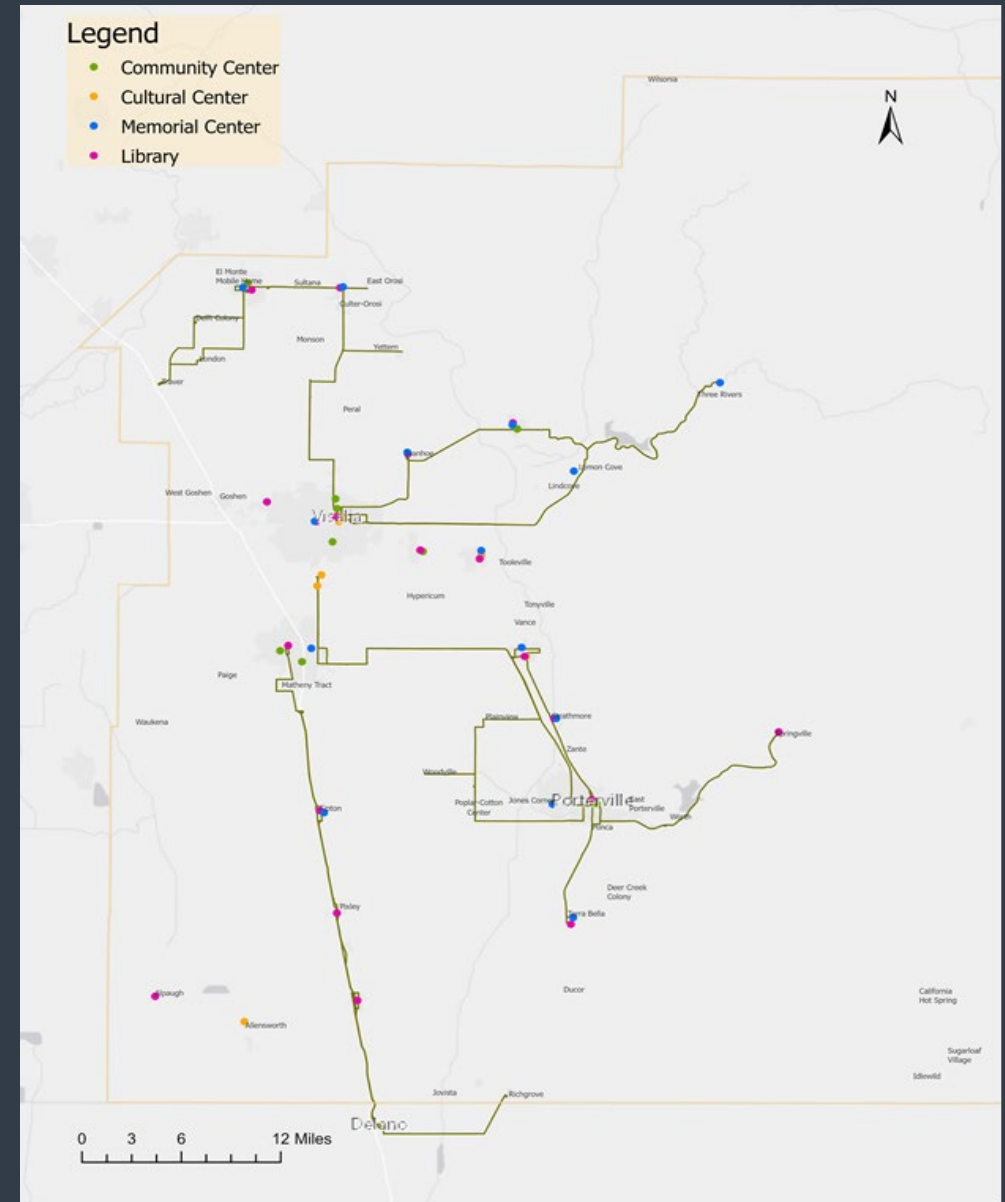
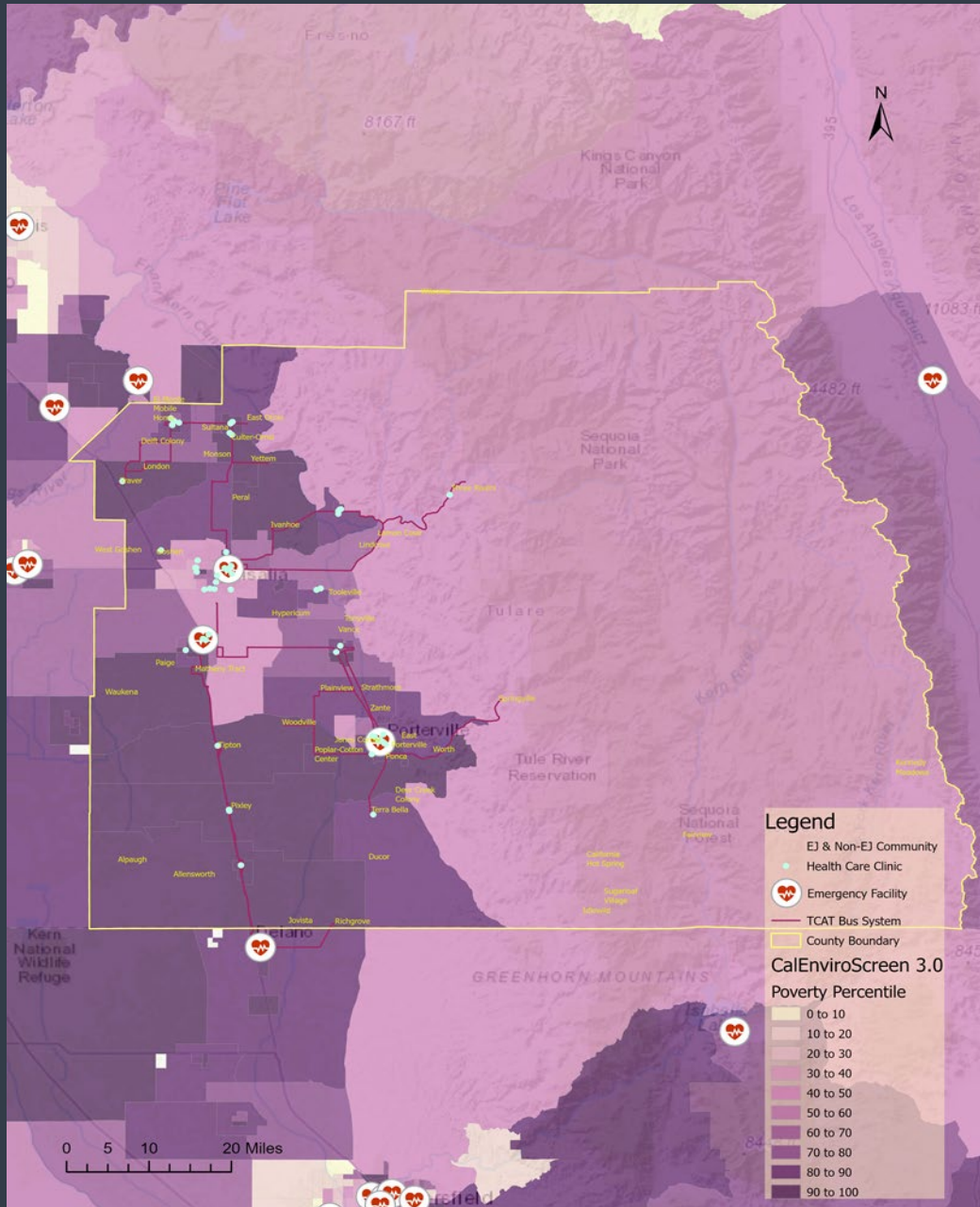


FIGURE Cultural facilities: libraries, community centers, and exhibition halls
Source: Tulare County, Planning and Economic Development Division



- Accessibility and transportation
- Cultural sensitivity
- Cultural competence
- Language barriers
- Affordability

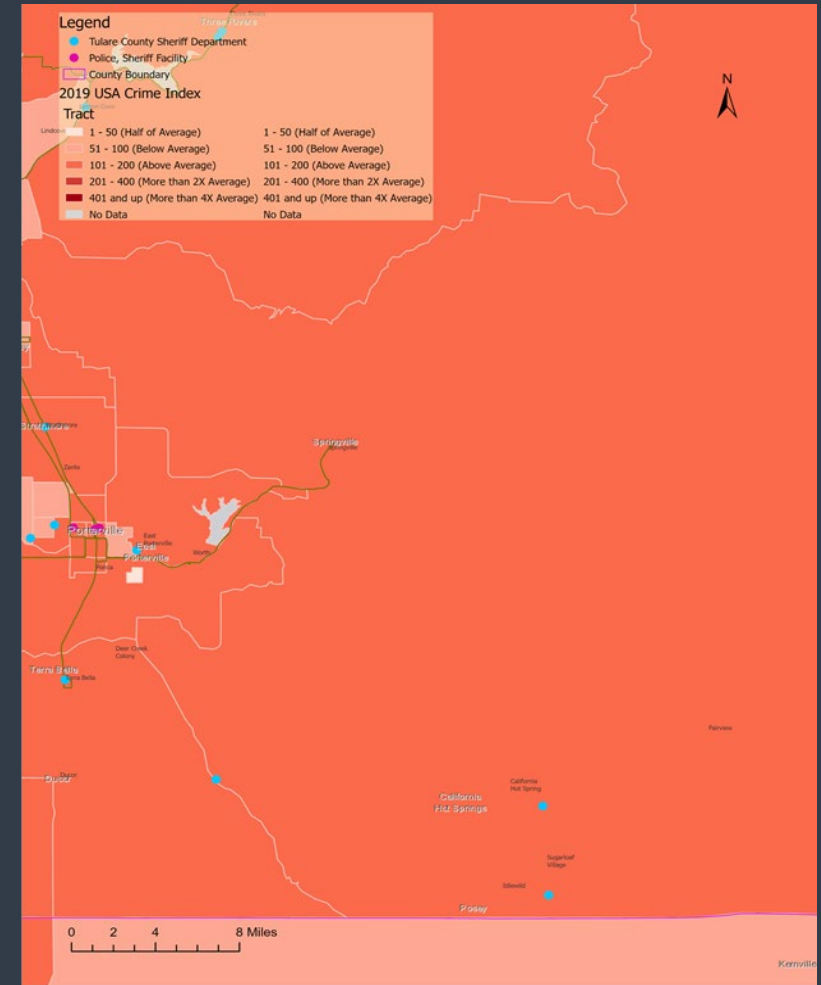
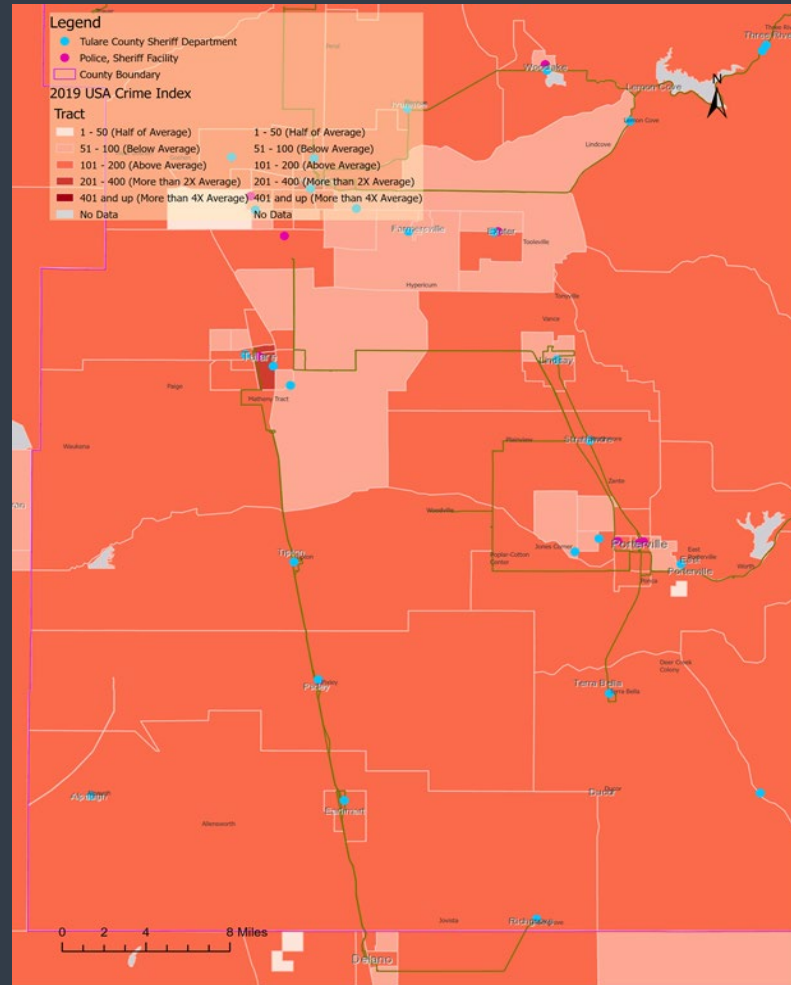
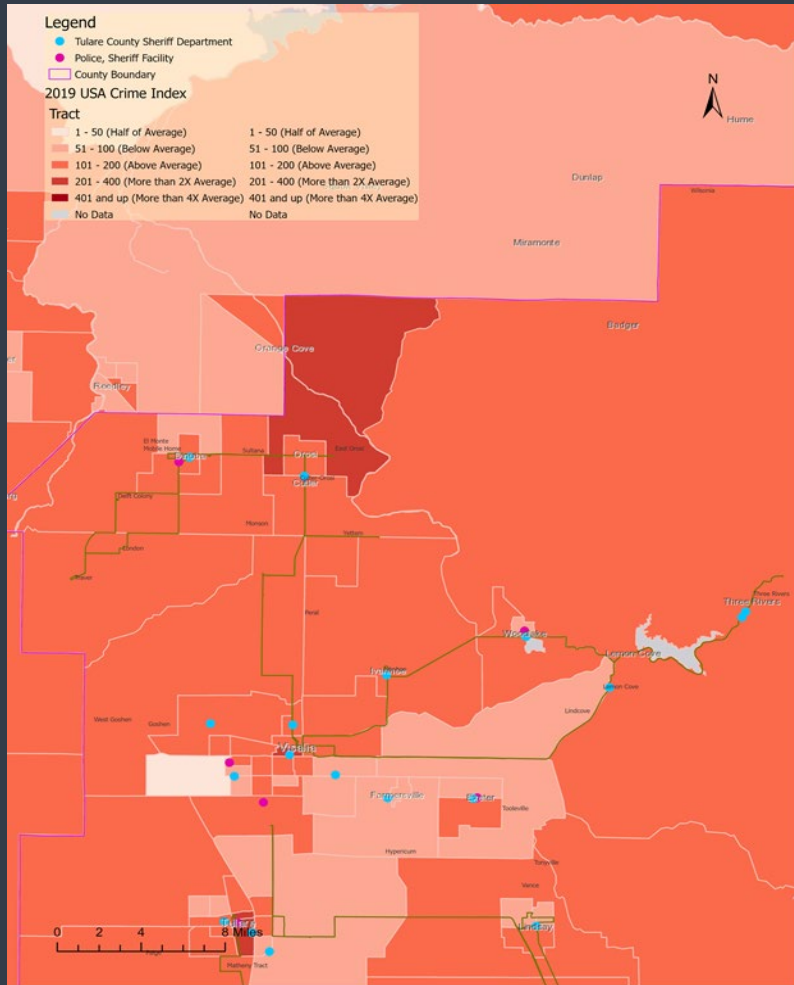


FIGURE Emergency public service facilities

Source: Esri Crime Index 2019; Tulare County, Planning and Economic Development Division

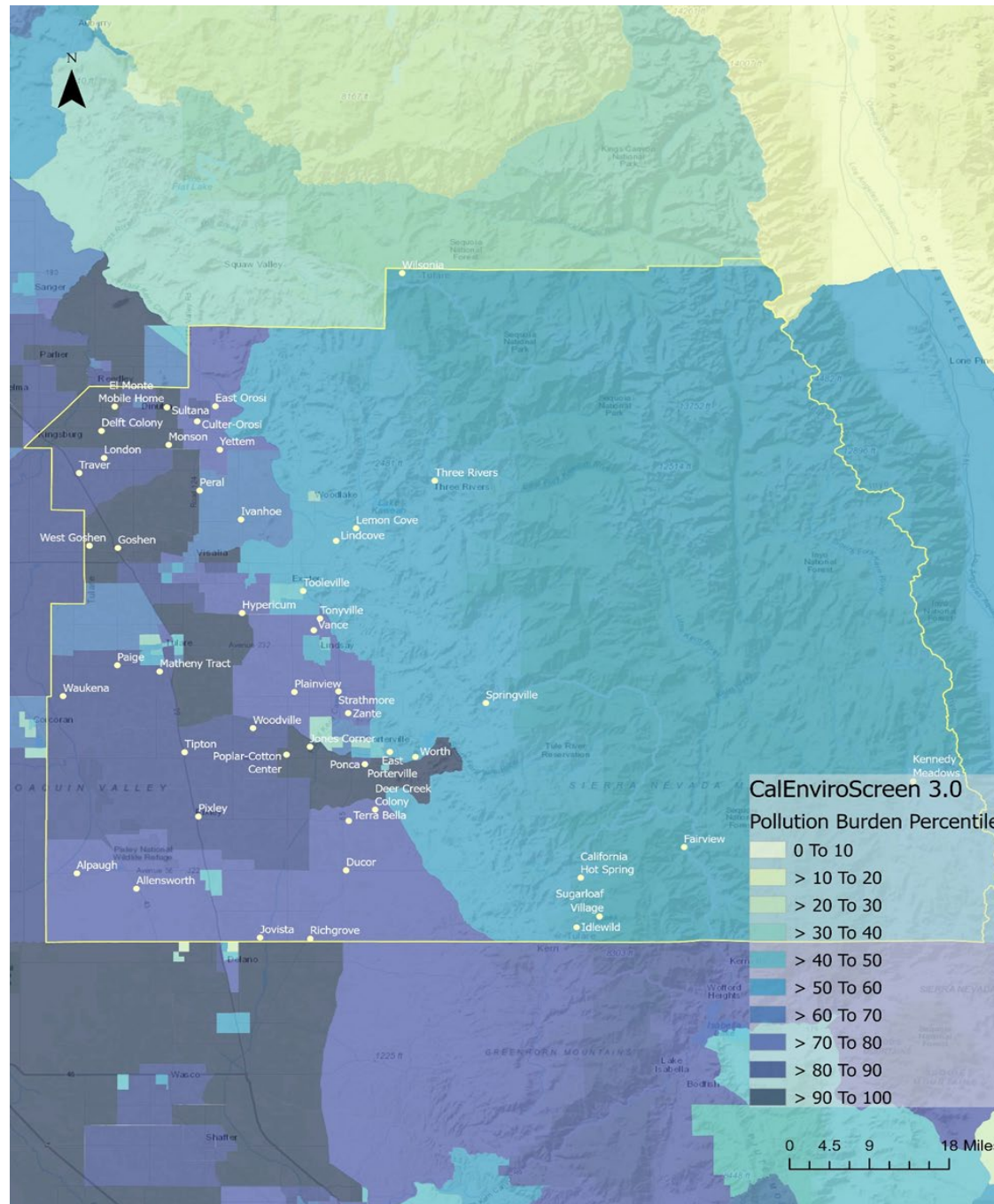
Pollution Burden: Air Quality, Pollution, Pesticides & Toxic Release Facilities

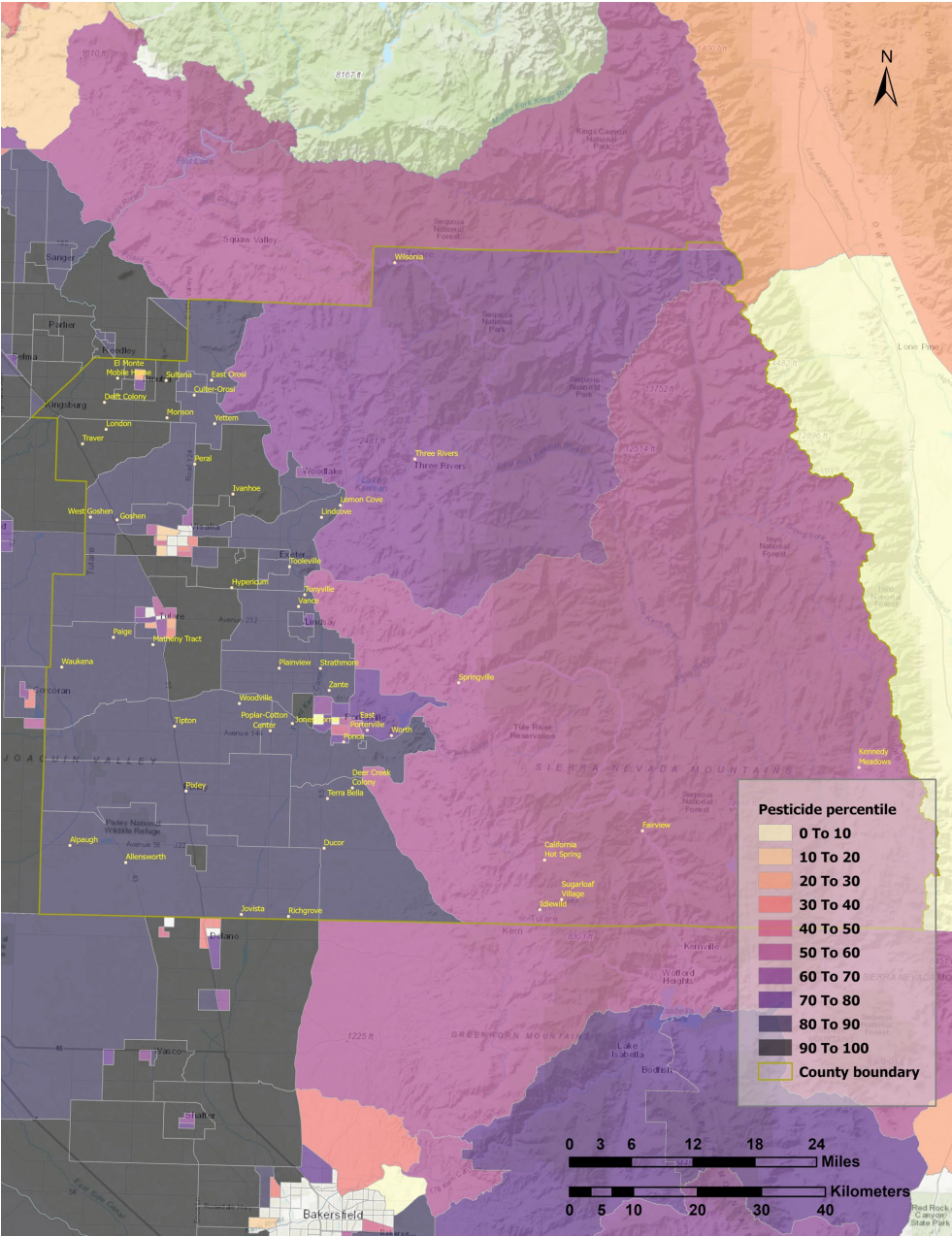
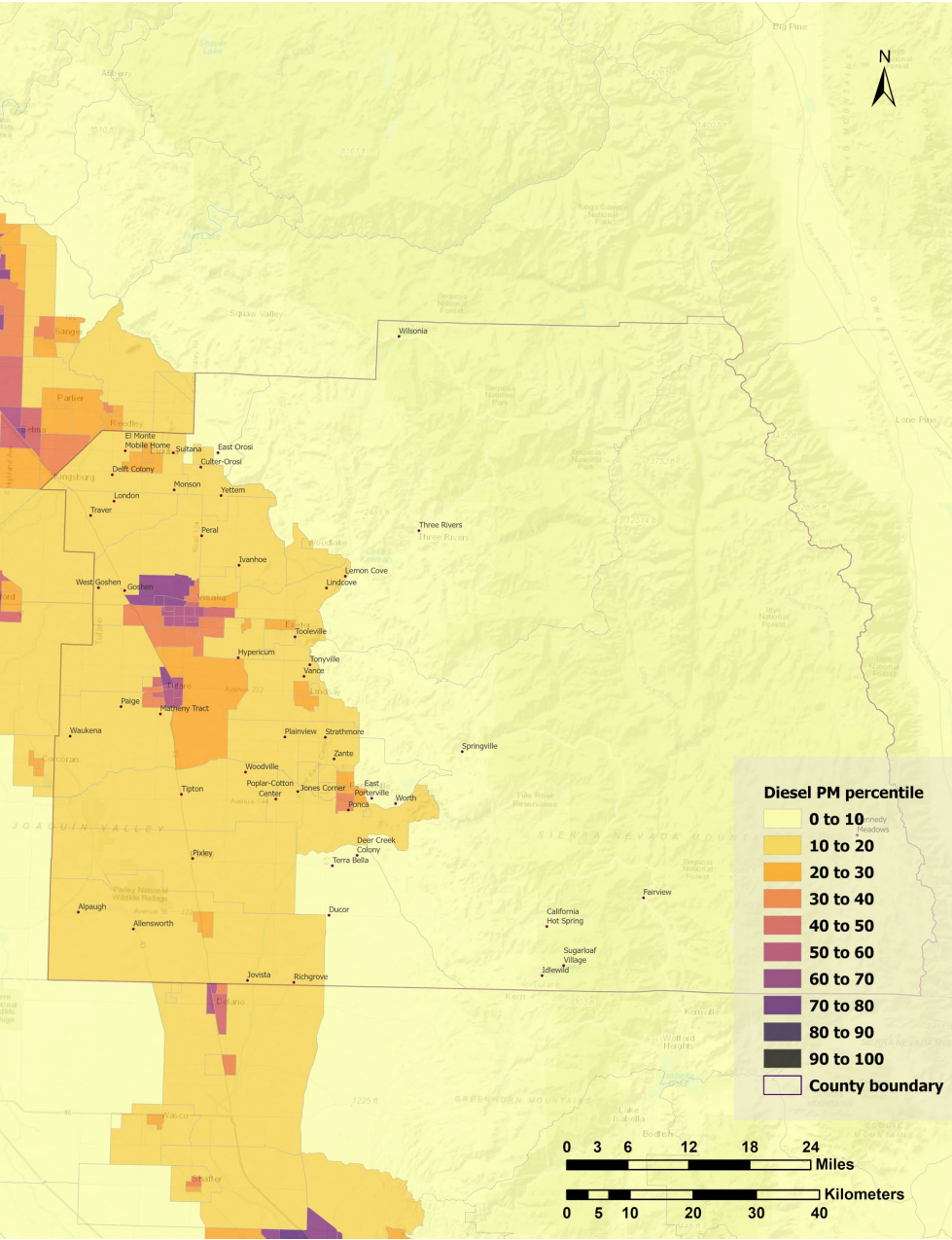
- Local ambient air quality
- Existing emission sources
- Impacts of air and environmental factors
- Ozone
- Diesel PM
- Pesticides
- Adverse affects on health quality
- Pollution and toxic emission facilities

FIGURE CalEnviroScreen pollution burden scores

Source: CalEnviroScreen 3.0

Indicators included in the pollution burden score are:
Ozone, PM2.5, Diesel PM, Toxic Releases, Traffic, Drinking Water, Cleanup Site, Groundwater Threat, Solid Waste Sites, Hazardous Waste Sites





Census Tract	EJ Community	Asthma	Heart Attack	Low Birth Weight
6107000201	Orosi	50.64	9.89	4.39
6107000202	East Orosi	49.26	9.2	6.72
6107000301	Delft Colony	40.8	7.55	4.04
	El Monte Mobile Home			
	Monson			
	Sultana			
6107000302	London	39	6.9	6.39
	Traver			
6107000600	Culter	26.3	7.82	4.76
	Yettem			
6107000800	Ivanhoe	39.62	8.224	4.29
6107000900	Goshen	41.3	6.87	5.31
	Peral			
	West Goshen			

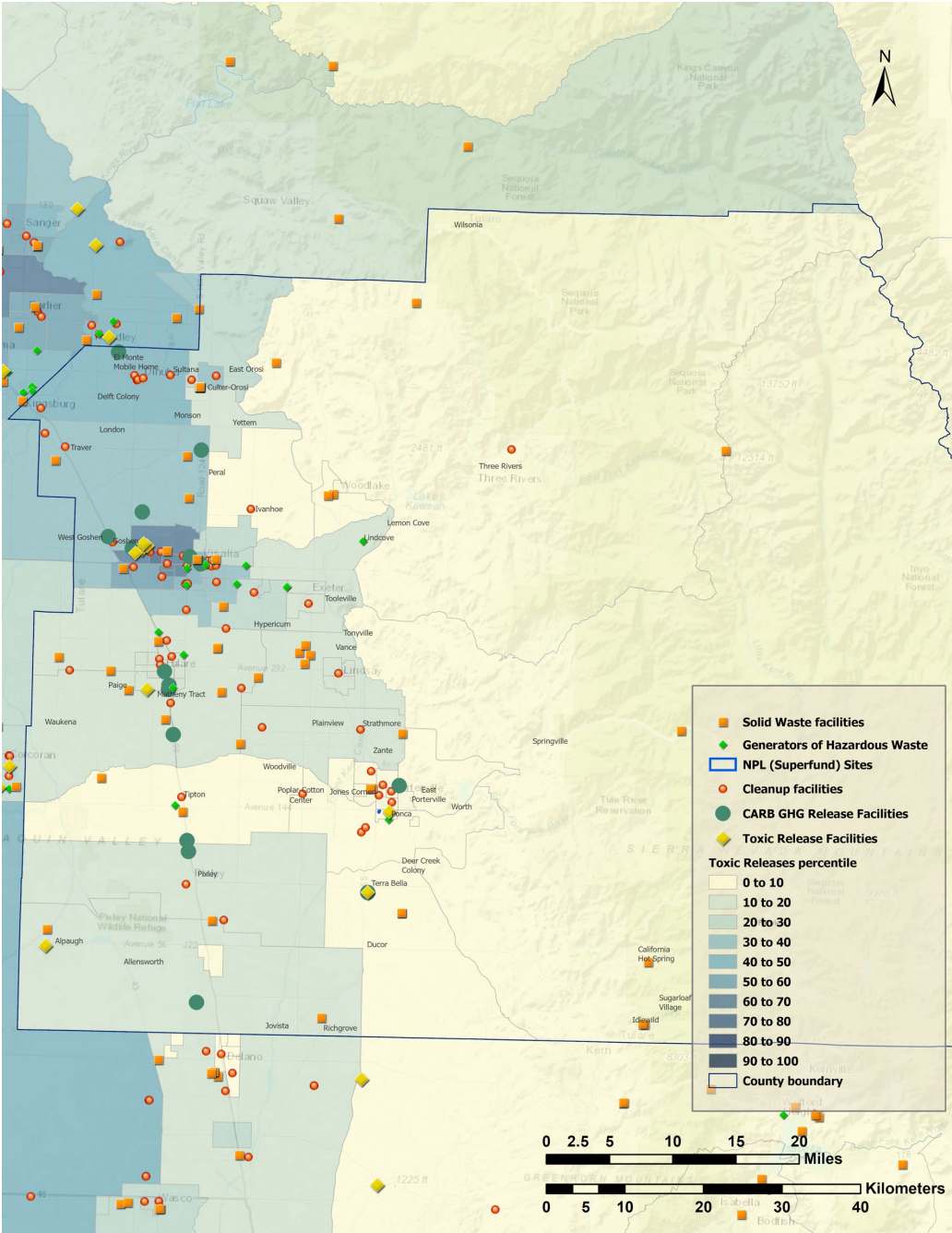
TABLE Emergency department visits for asthma and heart attack per 10,000 people & percent of low birth weight babies by census tract

Source: CalEnviroScreen 3.0

Census Tract	EJ Community	Asthma	Heart Attack	Low Birth Weight
6107001400	Tooleville	34.23	6	3.73
6107001602	Hypericum	43.54	6.63	6.36
6107002100	Paige	69.89	10.24	4.75
6107002500	Tonyville	44.4	8.62	4.16
6107002601	Vance	55.02	10.62	3.01
6107003100	Matheny Tract	70.29	10.42	4.48
	Waukena			
6107003200	Tipton	47.41	9.45	4.71
	Woodville			
6107003300	Plainview	61.72	12.09	4.29
	Strathmore			
	Zante			
6107003400	Jones Corner	55.95	11.45	5.12
	Poplar-Cotton Center			
	Ponca			
	Worth			
6107003902	East Porterville	52.07	10.72	6.2
6107004200	Pixley	51.49	11.78	4.61
	Teviston			
6107004300	Allensworth	49.37	8.59	5.47
	Alpaugh			
	Jovista			
	Richgrove			
6107004500	Deer Creek Colony	47.27	7.5	5.03
	Ducor			
	Terra Bella			

FIGURE Pollution emission, toxics emissions facilities

Source: CalEnviroScreen 3.0



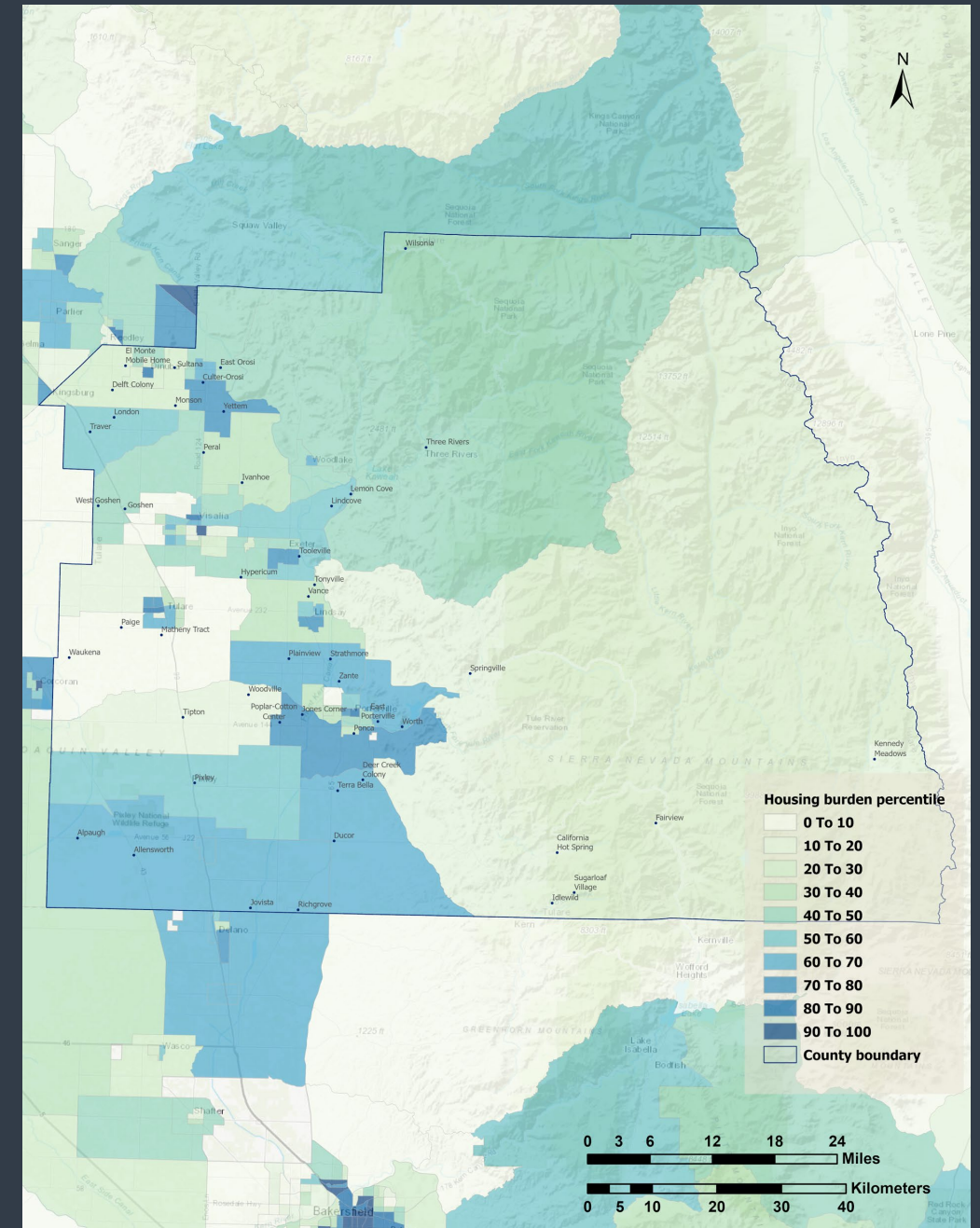
Row #	Facility	Address	Total On-site	Total Off-site	Total On- and
			Disposal or	Disposal or	Off-site
			Other Releases	Other Releases	Disposal or
					Other Releases
1	BLUESCOPE BUILDINGS NA INC	7440 DOE AVE, VISALIA	247.92	7,993.40	8,241.32
	CHROMIUM		58.02	2,255.00	2,313.02
	COPPER		11.2	431	442.2
	LEAD		1.32	51.4	52.72
	MANGANESE		137.59	3,712.00	3,849.59
	NICKEL		39.79	1,544.00	1,583.79
2	CALIFORNIA DAIRIES INC TIPTON.	11894 AVE 120, TIPTON	17,390	-	17,390
	PERACETIC ACID		17,390	-	17,390
3	CALIFORNIA DAIRIES INC VISALIA	2000 N PLAZA DR, VISA	24,963	1,186.20	26,149.20
	NITRATE COMPOUNDS		0	1,186.20	1,186.20
	NITRIC ACID		0	-	0
	PERACETIC ACID		24,963	-	24,963
4	CEMEX FARMERSVILLE PLANT.	532 TERRY AVE, FARME	0	-	0
	LEAD COMPOUNDS		0	-	0
	NITRATE COMPOUNDS		-	-	-
5	CHAMPION HOME BUILDERS CO DIV 09	840 W PALM AVE, LIND	-	-	-
	DIISOCYANATES		-	-	-
6	CROP PRODUCTION SERVICES	3201 AVE 54, ALPAUGH	800	6,740	7,540
	AMMONIA		260	-	260
	COPPER COMPOUNDS		15	15	30
	MANGANESE COMPOUNDS		15	562	577
	NITRATE COMPOUNDS		5	-	5
	ZINC COMPOUNDS		505	6,163	6,668
7	FOSTER FARMS PORTERVILLE PLANT	770 N PLANO ST, PORT	0	27,329	27,329
	NITRATE COMPOUNDS		0	27,329	27,329
	NITRIC ACID		-	-	-
8	FOSTER FARMS TRAVER FEEDMILL	4107 AVE 360, TRAVER	-	-	-
	COPPER COMPOUNDS		-	-	-
	MANGANESE COMPOUNDS		-	-	-
	ZINC COMPOUNDS		-	-	-
9	HYDRITE CHEMICAL CO	1603 CLANCY CT, VISAL	7	-	7
	CERTAIN GLYCOL ETHERS		-	-	-
	NITRIC ACID		7	-	7
	ZINC COMPOUNDS		-	-	-
10	JD HEISKELL & CO	11518 RD 120, PIXLEY C	-	-	-
	COBALT COMPOUNDS		-	-	-
	COPPER COMPOUNDS		-	-	-
	MANGANESE		-	-	-
	MANGANESE COMPOUNDS		-	-	-
	ZINC (FUME OR DUST)		-	-	-
	ZINC COMPOUNDS		-	-	-
11	KAWNEER CO INC.	7200 DOE AVE, VISALIA	926	-	926
	DIISOCYANATES		0	-	0
	TOLUENE		240	-	240
	XYLENE (MIXED ISOMERS)		686	-	686
12	KRAFT HEINZ FOODS CO.	10800 AVE 184, TULARE	0	566,046	566,046
	NITRATE COMPOUNDS		0	565,198	565,198
	NITRIC ACID		0	848	848

TABLE CARB report of facilities releasing GHG emissions

Source: CARB

Safe and Sanitary Homes

- Housing conditions
- Potential health threats to households built before 1980
- Household overcrowding and spread of diseases
- Household cost burden by income
- Household cost burden by race



Percentile Rank of Housing Conditions by Survey Area

	Sound	Deteriorated	Dilapidated
Allensworth	15%	40%	92%
Alpaugh	7%	55%	90%
Cutler	27%	95%	35%
Delft Colony	10%	55%	85%
Ducor	8%	55%	35%
Earlimart	77%	43%	30%
East Orosi	20%	75%	55%
East Porterville	43%	63%	60%
Goshen	78%	38%	32%
Hypernicum	57%	50%	58%
Ivanhoe	52%		
Lemon	37%		
Lindcove	20%		
London	10%		
Matheny	20%		
Monson	20%		
Orosi	88%		
Pixley	50%		

Source: Tulare County 2015
Housing Condition Survey; 2009
Housing Survey Data

	Community				Hamlet			
	Owner occupied	Percentage	Renter Occupied Housing	Percentage	Owner Occupied Housing	Percentage	Renter Occupied Housing	Percentage
Year Structure Built								
2014 or later	46	1%	3	0.0%	-		-	
2010 to 2013	103	1%	170	2%	12	3%	33	4%
2000 to 2009	559	8%	874	11%	64	14%	89	11%
1980 to 1999	1,840	26%	2,389	31%	125	27%	181	23%
1960 to 1979	2,720	38%	2,438	32%	137	29%	234	29%
1940 to 1959	1,416	20%	1,226	16%	115	25%	158	20%
1939 or earlier	453	6%	563	7%	16	3%	104	13%

TABLE Housing Units Built Pre-1980

Source: U.S. Census Bureau; 2013-2017 Census of Physical Housing

	White alone		Black or African-American alone		Asian alone	
	Owners	Renters	Owners	Renters	Owners	Renters
Household Income <= 30% HAMFI						
Number with any housing problems	261	417	0	30	14	55
Percent with any housing problems	21%	12%	0%	1%	1%	2%
Household Income > 30% to <=50% HAMFI						
Number with any housing problems	326	255	0	0	4	24
Percent with any housing problems	27%	11%	0%	0		
Household Income >50% to <=80% HAMFI						
Number with any housing problems	318	151	8	2		
Percent with any housing problems	21%	11%	1%	1		
Household Income >80% to <=100% HAMFI						
Number with any housing problems	186	46	0			
Percent with any housing problems	33%	18%	0%	0		

TABLE Housing cost burden by household income and race classification, EJ communities

Source: US Census; 2012-2016 American Community Survey 5-year Estimate; HUD Consolidated Planning/ Comprehensive Housing Affordability Strategy (CHAS) database, 2016.

	American Indian Or Alaska Native alone		Pacific Islander alone		Hispanic		Other (including multiple races, non-Hispanic)	
	Owners	Renters	Owners	Renters	Owners	Renters	Owners	Renters
Household Income <= 30% HAMFI								
Number with any housing problems	0	29	0	0	955	3040	25	29
Percent with any housing problems	0%	1%	0%	0%	76%	84%	2%	1%
Household Income > 30% to <=50% HAMFI								
Number with any housing problems	0	23	0	0	860	2069	19	39
Percent with any housing problems	0%	1%	0%	0%	71%	86%	2%	2%
Household Income >50% to <=80% HAMFI								
Number with any housing problems	0	0	0	0	1144	1225	4	20
Percent with any housing problems	0%	0%	0%	0%	76%	86%	0%	1%
Household Income >80% to <=100% HAMFI								
Number with any housing problems	0	20	0	0	367	167	0	0
Percent with any housing problems	0%	8%	0%	0%	65%	67%	0%	0%

Tulare County EJ Advisory Committee Activities

- Committee charter
- Public engagement strategies
- Limited scoping of General Plan policies
- EJ Element review

Next Steps

- Given feedback address information and data gaps
- Outreach materials and adding members to the committee board
- Grant research
- Education and technical assistance

DRAFT Tulare County Environmental Justice Element Steering Committee Charter

I. Background and Purpose:

- a. Tulare County is updating its General Plan per the requirements of SB 1000 and has elected to create a standalone Environmental Justice Element
- b. To support as much public engagement as possible and create a formal body to advise the Tulare County Board of Supervisors. In addition to support engagement, another purpose is to ensure the adoption of a strong Environmental Justice Element
- c. Definition of EJ: [own]

II. Relationship of the Group

- a. This Group is a committee of the Board of Supervisors and will develop policies and recommendations for the development of the EJ Element

III. Membership

- a. **Composition:** The committee shall be composed of representatives from the following communities and organizations:
 - i. Members:
 1. Disadvantaged communities
 2. Federal agencies
 3. County agencies
 4. Private industry
 5. Tulare County
 6. Other stakeholders

Tulare County Housing Element Comments

Reviewed by Environmental Justice Working Group in March 2020

1. Summary Housing Goal: "Attainment of a suitable, affordable, safe and sanitary living environment for every present and future resident in the unincorporated areas of Tulare County, regardless of race, age, religion, sex, marital status, ethnic background, source of income or personal disability."
 - a. ADD: gender identity or expression, sexual orientation, citizenship status, language
 - i. These lists are inconsistent throughout the Element, including for example when listed in 1.21 and 1.22.
2. Housing Policy 1.22: "Actively discourage through communication housing discrimination based upon race, religion, sex, marital status, sexual orientation, ancestry, national origin, family status, disability, language, or other factors."
 - a. How else can this be discouraged? How can County Counsel get involved? How can the California Department of Justice get involved? "Through communication" is not strong enough.
3. Housing Policy 1.34: "Encourage and support a balance between housing and agricultural needs."
 - a. This language is inconsistent between agricultural and housing policy be eliminated.
4. Housing Policy 1.5: "Housing providers shall ensure that the needs of all residents are being met."
 - a. ADD: "in close consultation with community groups and organizations."
5. Housing Guiding Principle 1: "Analyze past practices and policies to determine if they are equitable and inclusive for all unincorporated areas."
6. Housing Policy 2.1: "Encourage the development of new housing units."
 - a. ADD: "and the needs of all residents."
7. Housing Policy 2.2: "Encourage the development of new housing units."
 - a. In what scenarios? health and safety, environmental justice, and local water resources.
8. Housing Policy 2.2: "Encourage the development of new housing units."
 - a. ADD: "and the needs of all residents."

ENVIRONMENTAL JUSTICE ELEMENT 2020

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