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Via First Class Mail and E-Mail

Reed Schenke, Director
Tulare County Resource Management Agency
5961 South Mooney Boulevard
Visalia, CA 93277
rschenke@co.tulare.ca.us

RE: Tulare County Environmental Justice Element

Dear Mr. Schenke:

It is our understanding that Tulare County is currently drafting an Environmental Justice Element for its General Plan pursuant to Senate Bill 1000 ("SB 1000"). We recognize the difficulties facing Tulare County and its communities during the current public health crisis caused by COVID-19. The Attorney General's Bureau of Environmental Justice would like to serve as a resource for Tulare County as it updates its General Plan during this difficult time and throughout the drafting process. Therefore, we are writing to provide information on SB 1000, our initial feedback on Tulare County's plans for its General Plan Update, and resources for engaging with community members, identifying disadvantaged communities, and developing environmental justice policies.¹

A. Background on Environmental Justice and SB 1000

Low-income communities and communities of color often bear a disproportionate burden of pollution and associated health risks when compared to their more affluent neighbors. Similar to health risks that are connected to pollution exposures, evidence shows that the risks associated

¹ The Attorney General submits these comments pursuant to his independent power and duty to protect the environment and natural resources of California. *See* Cal. Const., art. V, § 13; Gov. Code §§ 12511, 12600-12612; *D'Amico v. Board of Medical Examiners*, 11 Cal.3d 1, 1415 (1974).

with COVID-19 are inequitably distributed among community members.² Further, recent studies indicate that exposures to industrial pollution significantly increase the likelihood of suffering serious health consequences, including death, from the COVID-19 virus.³

Environmental justice can address some of the longstanding disparate impacts in a community, and is defined 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.” Gov. Code § 65040.12(e)(1). California law further states that environmental justice includes, but is not limited to:

- (1) the availability of a healthy environment for all people;
- (2) the deterrence, reduction, and elimination of pollution burdens for communities disproportionately experiencing the adverse effects of that pollution;
- (3) governmental entities engaging and providing technical assistance to communities most impacted by pollution to promote their meaningful participation in all phases of the environmental and land use decisionmaking process; and
- (4) at a minimum, the meaningful consideration of recommendations from communities most impacted by pollution into environmental and land use decisions.

Id. § 65040.12(e)(2).

In 2016, the California Legislature passed SB 1000 to incorporate environmental justice into the local land use planning process. SB 1000 requires local governments to address pollution and other hazards that disproportionately impact low-income communities and communities of color in their jurisdiction. The law intends to make environmental justice a real and vital part of the planning process by encouraging transparency and public engagement during all stages of a general plan update, requiring local governments to identify environmental justice issues in their communities, and ensuring that local governments adopt environmental justice policies that address the specific needs of disadvantaged communities.

² See, e.g., Los Angeles Times, “Younger Blacks and Latinos are Dying of COVID-19 at Higher Rates in California” (Apr. 25, 2020), <https://www.latimes.com/california/story/2020-04-25/coronavirus-takes-a-larger-toll-on-younger-african-americans-and-latinos-in-california>.

³ Wu & Nethery, “Exposure to Air Pollution and COVID-19 Mortality in the United States,” Dept. of Biostatistics, Harvard T.H. Chan School of Public Health, https://projects.iq.harvard.edu/files/covid-pm/files/pm_and_covid_mortality.pdf; E&E News, “Study Links Higher NO₂ Levels to More Coronavirus Deaths” (Apr. 23, 2020), <https://www.eenews.net/eenewspm/2020/04/23/stories/1062953127>; New York Times, “New Research Links Air Pollution to Higher Coronavirus Death Rates” (Apr. 7, 2020), <https://www.nytimes.com/2020/04/07/climate/air-pollution-coronavirus-covid.html>.

B. Legal Requirements of SB 1000

If a local government adopts or updates two or more elements of its general plan after January 1, 2018, SB 1000 requires the local government to identify any “disadvantaged communities” within its planning area. Gov. Code § 65302(h)(1)-(2). This identification must be done in the general plan itself. *Id.* § 65302(h)(1). SB 1000 has a broad and flexible definition for “disadvantaged communities” that includes two identification methods: (1) “an area identified by the California Environmental Protection Agency (CalEPA) pursuant to Section 39711 of the Health and Safety Code;” or (2) “an area 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.” *Id.* § 65302(h)(4)(A).

Under the first method for identifying disadvantaged communities, an area is a disadvantaged community if it scores at or above 75 percent on CalEPA’s California Communities Environmental Health Screening Tool (“CalEnviroScreen”).⁴ The CalEnviroScreen tool and additional information regarding how it works are available on CalEPA’s website.⁵ Generally speaking, CalEnviroScreen identifies the communities in California that are burdened by multiple sources of pollution and most vulnerable to its effects, taking into account the socioeconomic status and health conditions of people living in these communities. Every census tract in California is ranked by combining the scores for 21 different indicators that relate to pollution burdens and population characteristics. The census tracts that score the highest are the most burdened and most vulnerable to pollution in California.

The second identification method requires a local government to first determine whether low-income areas exist in its jurisdiction. SB 1000 defines a “low-income area” as (1) “an area with household incomes at or below 80 percent of the statewide median income,” or (2) an area with “household incomes at or below the threshold designated as low income by the Department of Housing and Community Development’s (HCD) list of state income limits adopted pursuant to Section 50093 of the Health and Safety Code.” Gov. Code § 65302(h)(4)(C). After identifying low-income areas, a local government must then evaluate if these areas are disproportionately affected by environmental pollution that can lead to negative health impacts, pollution exposures, or environmental degradation. *Id.* § 65302(h)(4)(A). There are various data sets that can be used for the second part of this analysis, including CalEnviroScreen, that contain specific information about pollution sources (see resources in Section D below).

If a local government identifies one or more disadvantaged communities in its planning area, its general plan must have either an “environmental justice element” or “related goals, policies, and objectives integrated in other elements” (collectively, “EJ policies”) that address eight different topics. Gov. Code § 65302(h)(1). A general plan’s EJ policies must “reduce the

⁴ For a map of all disadvantaged communities in CalEnviroScreen, see CalEPA, Designation of Disadvantaged Communities, <https://oehha.ca.gov/calenviroscreen/sb535>.

⁵ CalEPA and Office of Health Hazard Assessment (“OEHHA”), CalEnviroScreen 3.0, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>; CalEPA and OEHHA, CalEnviroScreen 3.0 Report (Jan. 2017), <https://oehha.ca.gov/media/downloads/calenviroscreen/report/ces3report.pdf>.

unique or compounded health risks in disadvantaged communities” by doing at least the following:

- (1) reduce pollution exposure;
- (2) improve air quality;
- (3) promote public facilities;⁶
- (4) promote food access;
- (5) promote safe and sanitary homes; and
- (6) promote physical activity.

Id. § 65302(h)(1)(A). SB 1000 also requires EJ policies that: (7) “promote public engagement in the public decisionmaking process;” and (8) “prioritize improvements and programs that address the needs of the disadvantaged communities.” *Id.* § 65302(h)(1)(B)-(C).

C. Tulare County’s General Plan Update

Since Tulare County’s General Plan Update is in the early stages of development, our Office has not had an opportunity to review any draft documents or information regarding the County’s update to its General Plan. However, I discussed Tulare County’s vision for its General Plan Update with your staff member Aaron Bock on March 19, 2020 and May 3, 2020. Our initial comments on Tulare County’s General Plan Update are discussed below.

1. Timeline for Developing and Adopting the General Plan Update

Tulare County initially hoped to adopt the first phase of its Environmental Justice Element by July 2020, although this timeline will likely be extended to at least December 2020 given the unique circumstances presented by the COVID-19 pandemic. We understand and support the County’s desire to continue the important work of updating its General Plan during the pandemic, but we are concerned that the County’s goal to adopt the first phase this year may be unrealistic. One of the basic purposes of SB 1000 is to provide environmental justice communities with a meaningful opportunity to engage in government decisions that affect them. We are concerned that robust community engagement will be difficult for the County to conduct over the next few months when social distancing is still the norm. We urge Tulare County to not rush through its General Plan Update before the County has opportunities to fully engage with the disadvantaged communities in its jurisdiction.

⁶ SB 1000 defines “public facilities” as facilities that include “public improvements, public services, and community amenities.” Gov. Code § 65302(h)(4)(B).

2. Community Engagement Process

It is our understanding that Tulare County has formed an Environmental Justice Advisory Committee to begin evaluating the needs of disadvantaged communities in Tulare County and draft the County's EJ policies. The Advisory Committee is a small group of approximately six individuals, including representatives from government entities and nonprofit organizations. While we applaud the County's decision to have an Advisory Committee focused on environmental justice, there are several ways that Tulare County can improve the Advisory Committee to ensure it represents all of the County's disadvantaged communities. First, Tulare County should consider expanding the Advisory Committee to ensure that all of its disadvantaged communities are represented on the Committee. Tulare County has dozens of disadvantaged communities spread across its vast jurisdiction, and each of these communities have unique burdens and needs. The County should consider inviting residents from each of these communities to join the Advisory Committee, or at least members of regional community organizations that represent several disadvantaged communities in the County. Another way Tulare County can ensure that all of its disadvantaged communities have a voice on the Advisory Committee is by opening the Advisory Committee meetings to the public. Given the COVID-19 pandemic, the public should be able to attend these meetings either by telephone or by joining the meeting via online conferencing or video streaming tools. These open Advisory Committee meetings would provide the public with opportunities to learn about the Committee's progress and give feedback on the Committee's work.

In addition to the Advisory Committee, Tulare County should develop a strategy for engaging with community members throughout its expansive jurisdiction, especially during the pandemic when in-person meetings may not be feasible or safe. For example, the County could host online workshops to discuss environmental justice with community members or prepare an online survey to determine the top environmental justice-related priorities in disadvantaged communities. The County should also partner with organizers from local community groups to identify the most effective ways to communicate with residents of disadvantaged communities that may lack access to the internet. After the risks associated with in-person meetings subside, Tulare County should host in-person workshops in different areas throughout the County where disadvantaged communities are present. Regardless of which methods Tulare County chooses to engage with its community members, we encourage the County to use the following best practices as it proceeds with its General Plan Update:

- (1) partner with local community and advocacy organizations to improve and increase community engagement;
- (2) host meetings and workshops that will provide background information on environmental justice, SB 1000, and the general plan for disadvantaged communities, including educational and training materials, to facilitate an equitable planning process;
- (3) host meetings and workshops specifically designed for disadvantaged communities to provide updates on the planning process and give interested parties an opportunity to provide feedback;

- (4) provide documents related to the General Plan Update in the native languages of local disadvantaged communities;
- (5) provide translation services at all meetings and hearings, even if these meetings and hearings are conducted remotely;
- (6) hold meetings and workshops on weekends or weekday evenings and locate the in-person meetings within disadvantaged communities to facilitate attendance;
- (7) make all meetings related to the General Plan Update public;
- (8) for every meeting, share the agenda, summarize the comments received, post any decisions made, and provide information on how public comments will be incorporated into the General Plan Update;
- (9) share preliminary drafts and concepts with communities so that feedback from community members can be incorporated into the County's plans and documents; and
- (10) make documents, public notices, and other community engagement tools readily available and shareable on websites, email lists, and social media.⁷

3. Transparency During the General Plan Update

Tulare County has not yet posted any information about its General Plan Update or draft Environmental Justice Element on any websites or in any newsletters. In order for Tulare County's community engagement to be effective, it is important for Tulare County to develop methods to transparently share information about its General Plan Update throughout each stage of its planning process. We strongly encourage Tulare County to prepare a website specific to its General Plan Update where the public can view meeting and hearing notices, background information, and draft documents.⁸ The website should also have a place where the public can provide comments and sign up for email notifications for the General Plan Update.

⁷ Many of these best practices echo the recommendations presented in the Leadership Council for Justice and Accountability's March 10, 2020 letter to the Tulare County Resource Management Agency. We support the Leadership Council's recommendations for engaging with community members during the County's General Plan Update.

⁸ There are many examples of websites for general plan updates and environmental justice elements. *See, e.g.*, Contra Costs County, 2040 General Plan Update, <https://envisioncontracosta2040.org/>; Culver City, General Plan 2045, <https://www.pictureculvercity.com/>; El Centro, 2040 General Plan Update, <https://www.elcentro2040.com/>; Sacramento County, Environmental Justice Element, <https://planning.saccounty.net/PlansandProjectsIn-Progress/Pages/Environmental-Justice-Element.aspx>; Ventura County, 2040 General Plan Update, <https://vc2040.org/>.

4. Phased Approach for the Environmental Justice Element

Tulare County staff has indicated that the County plans to use a two-phased approach to develop its Environmental Justice Element. This method is based on Sacramento County's process for its Environmental Justice Element, which was recently adopted on December 17, 2019. Phase 1 of Sacramento County's Element was finalized approximately a year and a half before Phase 2, and set the stage for Phase 2 with a comprehensive community outreach program,⁹ an identification of Sacramento County's four disadvantaged communities, an evaluation of environmental justice-related baseline conditions in Sacramento County, and an assessment of the County's existing EJ policies.¹⁰ Phase 2 built on Phase 1 by continuing public outreach and drafting new EJ policies that address SB 1000's minimum requirements and fill the gaps identified in Sacramento County's existing General Plan.¹¹ Sacramento County also prepared a "Supporting Research Document" that summarized all of the baseline data collected for each disadvantaged community in its jurisdiction.¹² This research document was revised after receiving feedback from community members, and it was used to develop EJ policies that address the specific needs of each disadvantaged community in Sacramento County.

There are several lessons that Tulare County can learn from Sacramento County's process as Tulare County continues to develop its own Environmental Justice Element. First, Sacramento County spent several years implementing its phased approach, which allowed sufficient time to engage with community members, receive feedback, and draft EJ policies. Second, Sacramento County's background assessment in Phase 1, including its evaluation of the specific environmental justice-related burdens faced by each disadvantaged community, provided valuable information to the County as it developed new EJ policies in Phase 2. We encourage Tulare County to conduct a complete assessment of the baseline conditions for each of its disadvantaged communities. Third, it will be important for Tulare County to continue into the second phase to develop its EJ policies after it completes the first phase, as this second phase will be critical for SB 1000 compliance.

⁹ Sacramento County, Summary of EJ Element Public Engagement, <https://planning.saccounty.net/PlansandProjectsIn-Progress/Documents/Environmental%20Justice%20Element/12.17.19%20BOS%20Hearing%20Materials/ATT%205%20-%20Listing%20and%20Chronology%20of%20Outreach.pdf>.

¹⁰ Sacramento County, Environmental Justice Element - Phase 1, <https://planning.saccounty.net/PlansandProjectsIn-Progress/Documents/EJ%20Element%20Master%20Text%20with%20Cover%205.8.18.pdf>.

¹¹ Sacramento County, Environmental Justice Element - Full Element, <https://planning.saccounty.net/PlansandProjectsIn-Progress/Documents/General%20Plan%202030/Environmental%20Justice%20Element.pdf>.

¹² Sacramento County, Environmental Justice Element - Research Document, <https://planning.saccounty.net/PlansandProjectsIn-Progress/Documents/Environmental%20Justice%20Element/EJ%20Webpage%20Update%2011.1.19/Supporting%20Research%20Document%20-%20Clean.pdf?csf=1&e=uUcHxU>.

5. Identification of Disadvantaged Communities

It is our understanding that Tulare County has already identified many disadvantaged communities in its jurisdiction pursuant to Senate Bill 244 (“SB 244”) and analyzed the infrastructure needs for some of these communities in its existing General Plan and Community Plans. While SB 244 and SB 1000 have similar objectives, it is important to note that these two laws have different, although partially overlapping, definitions for disadvantaged communities and distinctive requirements for policies that address the burdens and needs of disadvantaged communities. Therefore, Tulare County must undergo a separate process for identifying disadvantaged communities for the purposes of SB 1000.

As described above, there are several ways to identify disadvantaged communities under SB 1000. Gov. Code § 65302(h)(4)(A), (C). Regardless of the methods used, CalEPA’s CalEnviroScreen is a helpful starting point for identifying disadvantaged communities. This tool combines pollution burden indicators with population characteristics and socioeconomic indicators to rank every census tract in California, with the tracts most burdened by and vulnerable to pollution scoring the highest. CalEPA designates an area as a disadvantaged community if a census tract scores at or above 75 percent on CalEnviroScreen. In addition, CalEnviroScreen provides indicator-specific data, ranking each census tract in California based on the individual pollution or vulnerability indicator. This information can help Tulare County identify the pollution sources that disproportionately expose community members and the corresponding health burdens.

According to CalEnviroScreen, there are 35 census tracts in Tulare County that are designated as disadvantaged communities. All of these census tracts are located along the western third of the County and consist of small agricultural communities with alarmingly high pollution burdens. Many communities in this area are exposed to more drinking water contamination, pesticides, ozone pollution, and particulate matter 2.5 than 90 percent of Californians. Not only are these communities exposed to more pollution, they are also some of the most vulnerable communities of color in the state. For example, the Tulare County communities of Pixley, Tipton, and Traver are at least 80 percent Latinx with poverty rates in the 98-99th percentile and extreme linguistic isolation.

In addition to CalEnviroScreen, SB 1000 permits local governments to identify disadvantaged communities by determining low-income areas that are disproportionately burdened by pollution. Gov. Code § 65302(h)(4)(A), (C). Since Tulare County’s SB 244 analysis and other studies identify far more disadvantaged communities in the County than those identified in CalEnviroScreen,¹³ we encourage Tulare County to conduct this additional evaluation to fully identify the disadvantaged communities in its jurisdiction under SB 1000.

¹³ See, e.g., Tulare County, Senate Bill 244 Disadvantaged Communities Assessment – Parts 1 & 2 (Oct. 2015), <http://generalplan.co.tulare.ca.us/documents/GP/001Adopted%20Tulare%20County%20General%20Plan%20Materials/000General%20Plan%202030%20Part%20I%20and%20Part%20II/GENERAL%20PLAN%202012.pdf> (identifying 77 disadvantaged unincorporated communities);

6. Drafting Tailored EJ Policies

Tulare County's EJ policies should match the pollution burdens and unique needs of the disadvantaged communities in its jurisdiction. The County's EJ policies should at least include specific commitments to address the top pollution burdens identified in CalEnviroScreen, including drinking water contamination, pesticides, ozone, and particulate matter. For example, drinking water-related EJ policies could encourage consolidation of public water systems that are able to provide clean and safe drinking water to County residents or support water quality testing for domestic well users. Further, EJ policies to address pesticide exposures could include mandatory buffer zones and pesticide use notification programs.

D. Resources for SB 1000 Compliance

There are many resources available to Tulare County as it continues to develop its General Plan Update and Environmental Justice Element. To supplement the resources described below and the information Tulare County collects from community members, we encourage the County to visit the Attorney General's SB 1000 website to identify tools and data sources that may be relevant to Tulare County's specific needs and circumstances.¹⁴

1. Community Engagement

OPR's 2017 General Plan Guidelines are a helpful tool for developing a robust and effective community engagement strategy. The Guidelines contain several chapters that discuss public engagement techniques and timelines, including Chapter 3 (Community Engagement and Outreach) and Chapter 4 (Required Elements – Environmental Justice).¹⁵ We encourage Tulare County to review and follow these Guidelines as it prepares a community engagement strategy for its General Plan Update.

Other local governments that are updating their general plans to include EJ policies offer examples for how Tulare County can effectively engage its disadvantaged communities. For example, Ventura County provided Spanish and Mixteco interpretive services at key community meetings, along with Spanish informational materials at its meetings and on its website for the

Tulare County, Disadvantaged Community Water Study for the Tulare Lake Basin (Aug. 2014), Table 3-4,
https://tularecounty.ca.gov/cao/assets/File/Final%20TLB%20DAC%20Docs/Final%20Report/Final%20Report_2014-Aug.pdf (identifying 113 disadvantaged communities); PolicyLink, California Unincorporated: Mapping Disadvantaged Communities in the San Joaquin Valley (2013), pp. 42-43,
https://www.policylink.org/sites/default/files/CA%20UNINCORPORATED_FINAL.pdf (identifying 114 disadvantaged unincorporated communities).

¹⁴ State of California Department of Justice, SB 1000 – Environmental Justice in Local Land Use Planning, <https://oag.ca.gov/environment/sb1000>.

¹⁵ OPR, 2017 General Plan Guidelines, pp. 26-38, 164-194,
<http://www.opr.ca.gov/planning/general-plan/guidelines.html>.

2040 General Plan.¹⁶ Ventura County also released a Preliminary Public Review Draft of its 2040 General Plan and held a series of open house events for members of the public to learn about the Draft Plan, review it, and provide feedback—all before the County prepared its Draft Environmental Impact Report. This approach engaged the community early in the planning process and allowed Ventura County to incorporate community feedback into its 2040 General Plan prior to undergoing the more rigorous environmental review process under CEQA. In addition, the City of Placentia developed an effective community engagement process by partnering with a local advocacy group that helped the City host community meetings and conduct surveys regarding community members' priorities and hopes for Placentia's EJ policies.¹⁷

2. Identifying Disadvantaged Communities and Pollution Burdens

As discussed above, there are several mapping tools that can be used to identify disadvantaged communities in Tulare County, including CalEnviroScreen and CalEPA's SB 535 Disadvantaged Communities Map.¹⁸ For specific information regarding pollution burdens, Tulare County should explore CalEnviroScreen's maps for pollution exposure indicators,¹⁹ the California Health Places Index,²⁰ and the Public Health Institute's Tracking California Project.²¹ Since Tulare County has many communities that face serious drinking water challenges, the County should also reference the State Water Resources Control Board's ("SWRCB") Human Right to Water Website, which includes a map showing all public water systems that are out of compliance with state drinking water standards, and the SWRCB's tools for assessing groundwater quality in areas that rely on groundwater for drinking water.²² Tulare County should also consult data sources for pesticide applications, including the Tracking California map for all reported pesticide applications from 1991-2016, since many of its disadvantaged communities are located in agricultural areas with heavy pesticide use.²³

¹⁶ County of Ventura, 2040 General Plan, Meetings and Presentations, <https://vc2040.org/engage/meetings-and-presentations>.

¹⁷ City of Placentia, Health, Wellness, and Environmental Justice Element (Oct. 2019), pp. 11-14, <http://www.placentia.org/DocumentCenter/View/8394/10-Health-Wellness-and-Environmental-Justice>.

¹⁸ CalEPA and OEHHA, CalEnviroScreen 3.0, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>; CalEPA, Designation of Disadvantaged Communities, <https://oehha.ca.gov/calenviroscreen/sb535>.

¹⁹ OEHHA, Indicators Overview, <https://oehha.ca.gov/calenviroscreen/indicators>.

²⁰ Public Health Alliance of Southern California, California Health Places Index Map, <https://map.healthyplacesindex.org>.

²¹ Tracking California, Maps and Data, <https://www.trackingcalifornia.org/>.

²² SWRCB, Human Right to Water Portal, https://www.waterboards.ca.gov/water_issues/programs/hr2w/; SWRCB GAMA Online Tools, https://www.waterboards.ca.gov/water_issues/programs/gama/online_tools.html.

²³ Tracking California, Agricultural Pesticide Mapping Tool, <https://trackingcalifornia.org/pesticides/pesticide-mapping-tool>.

3. Environmental Justice Policies

There are many example EJ policies from other local governments that Tulare County can reference as it develops its own policies. OPR's 2018 Draft General Plan Guidelines includes a collection of example EJ policies from adopted general plans that address various environmental justice challenges.²⁴ For example, Marin County's Natural Systems and Agricultural Element of its General Plan has several policies that support Marin County's goal to provide clean drinking water (see Policies WR-2.1 to 2.5). Marin County's General Plan also has specific action items that are designed to improve water quality, including a groundwater monitoring program for unincorporated areas (Action WR-2.o) and a requirement that all County facilities use the least toxic pest control methods (Action WR-2.n). In a recently adopted general plan not included in OPR's 2018 Draft, the City of Placentia adopted strong EJ policies that could also serve as a model for Tulare County.²⁵ Placentia's Environmental Justice Element provides nuanced discussions of the specific disadvantaged communities in Placentia's jurisdiction, identifies strong and unique EJ policies to address the needs of these communities, and commits to prioritizing environmental justice-related programs.²⁶

In conclusion, thank you for considering our suggestions for a strong Environmental Justice Element in Tulare County. Please do not hesitate to reach out to me if you have any questions throughout the remainder of your planning process. We look forward to serving as a resource for Tulare County as it continues its General Plan Update.

Sincerely,



ABIGAIL BLODGETT
Deputy Attorney General
Bureau of Environmental Justice

For XAVIER BECERRA
Attorney General

²⁴ OPR, Healthy & Environmentally Just Communities Public Draft for Review (Nov. 19, 2018), http://opr.ca.gov/docs/20181120-Draft_for_public_review_example_GPG_Policy_Language.pdf.

²⁵ Placentia, General Plan Update, <https://www.placentia.org/166/General-Plan-Update>.

²⁶ *Id.* at pp. 10-8 to 10-15, 10-32 to 10-49.