

Huntington Park Environmental Justice Element

Response to CBE Comment Letter dated July 1, 2022

Section A: Introduction

On July 1, 2022, the City of Huntington Park (“the City”) received a comment letter from the non-profit organization Communities for a Better Environment (“CBE”) regarding the findings of the Environmental Justice Technical Report. Considering that this comment letter was received concurrent with the publishing of the City’s Draft Environmental Justice Element (“Draft EJ Element”) and is primarily consistent of focused policy suggestions, the City will consider this comment letter as part of the public comment process for the Draft EJ Element.

Section B below provides responses to each of the written comments raised regarding the Draft Environmental Justice Technical Report and/or Draft Environmental Justice Element.

Section B: Response To Comments:

A. Pollution Exposure and Air Quality

- **Comment A.1:**

The EJ Element includes policies that direct truck route identification to insulate sensitive receptors from Diesel Particulate Matter (DPM) pollution and policies to limit truck idling to further insulate sensitive receptors from emissions exposure.

- **Comment A.2:**

The EJ Element includes policies to reduce pollution exposure for sensitive receptors. Examples of relevant policies from the EJ Element include:

- Policy 1.1: Reduce Particulate Matter (Diesel PM and PM 2.5) pollution for sensitive land uses by establishing roadway-adjacent pollution mitigation strategies (green walls, vegetative barriers, etc.) in locations where a major local roadway interfaces with a sensitive land use by the year 2024.
- Policy 1.2: Reduce the impacts of particulate matter and toxic release air pollution on sensitive receptors in the city by establishing an Air Filtration Support program that provides funding and support for low-income residents to install indoor air filtration improvements.
- Policy 1.6: Advocate for all local public schools to be retrofitted with MERV-13 filtration to protect students from local air pollution risk by the year 2024.
- Policy 1.8: Develop and maintain public programs to increase access to at-home pollution exposure remediation for residents of Huntington Park, including lead-based paint inspections and household air purification devices. (Housing Element Policy 2.9)
- Policy 1.9: Ensure that all local solid waste facilities are operating consistent with CalRecycle and California Environmental Protection Agency regulations to protect residents from hazardous waste pollution associated with local sites.
- Policy 1.10: Coordinate with local solid waste and hazardous waste operators to develop site-specific upgrades that reduce pollution exposure beyond the minimum regulatory standards.

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- Policy 1.11: Insulate the communities in the northern and western peripheries of the city from hazardous waste and solid waste facility impacts by developing a targeted task force focused on limiting industrial pollution exposure.

- **Comment A.3:**

The EJ Element includes policies to support remediation of pollution exposure related to hazardous waste sites, solid waste facilities, and Brownfield sites.

- **Comment A.4:**

The EJ Element includes the following policy to address the Exide battery-recycling facility:

- Policy 1.17: Develop a working group with the California Department of Toxic Substances Control, relevant community organizations, and interested residents, with the goal of expediting the on-going Exide battery-recycling facility cleanup and supporting outreach to residents regarding the ongoing cleanup.

- **Comment A.5:**

The Technical Report assesses drinking water contamination based on CalEPA's CalEnviroScreen Drinking Water Contaminant indicator. The CalEnviroScreen Drinking Water Contaminant indicator is primarily based on federal drinking water standards.

The EJ Element includes the following policy to address water quality:

- Policy 1.17. Develop a working group with the California Department of Toxic Substances Control, relevant community organizations, and interested residents, with the goal of expediting the on-going Exide battery-recycling facility cleanup and supporting outreach to residents regarding the ongoing cleanup.

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B. Public Facilities

- **Comment B.1:**

The EJ Element includes policies to increase access and availability of parks, open space, and public facilities in Huntington Park. Examples of relevant policies from the EJ Element include:

- Policy 2.1: Prioritize the safety and quality of public parks by utilizing Crime Prevention Through Environmental Design (CPTED) techniques in the development and improvement of local parks and open space.
- Policy 2.2: Increase the availability of public green space in the Western portion of the City by developing joint-use agreements with local LAUSD schools that expand access to recreation facilities to the Huntington Park community.
- Policy 2.3: Improve accessibility to local public facilities and resources by expanding the HP Express to provide access to a wider variety of public facilities and exploring opportunities to subsidize ridership for residents of Huntington Park.

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- Policy 2.5: Bolster access to public facilities and improve active transportation by expanding bicycle infrastructure across the city.
- Program 2.5.1: By 2030, develop an updated Bicycle and Transportation Master Plan that is focused on expanding safe, local bike routes and increasing regional connectivity
- Policy 2.10: Ensure access to green space for all residents.
- **Comment B.2:**

The EJ Element includes policies to support joint-use agreements with Huntington Park schools. Examples of relevant policies from the EJ Element include:

 - Policy 2.2: Increase the availability of public green space in the Western portion of the City by developing joint-use agreements with local LAUSD schools that expand access to recreation facilities to the Huntington Park community.
- **Comment B.3:**

The EJ Element includes policies to improve active transportation opportunities and infrastructure in Huntington Park. Examples of relevant policies from the EJ Element include:

 - Policy 2.7: Bolster access to public facilities and improve active transportation by expanding bicycle infrastructure across the city.
 - Program 2.7.1: By 2030, develop an updated Bicycle and Transportation Master Plan that is focused on expanding safe, local bike routes and increasing regional connectivity
 - Policy 5.5: Improve walkability across the city by improving sidewalk quality and pedestrian accessibility through the implementation of the policies and programs outlined in the existing Complete Streets Plan.
 - Program 5.5.1: Adopt a Safe Routes to School Resolution as recommended in the 2019 Safe Routes to School Launch Program.
 - Policy 5.7: Support active transportation by expanding tree canopy and plant vegetation in the city through the development of an urban greening initiative by the year 2025.
- **Comment B.4:**

The EJ Element includes policies to support pedestrian safety and improve active transportation across Huntington Park. Examples of relevant policies from the EJ Element include:

 - Policy 2.1: Prioritize the safety and quality of public parks by utilizing Crime Prevention Through Environmental Design (CPTED) techniques in the development and improvement of local parks and open space.
 - Policy 2.4: Ensure that all local bus stops are equipped with adequate seating, lighting, canopies, and signage to protect the safety and accessibility of local public transportation.
 - Policy 5.3: Ensure that all city parks and open spaces are safe for resident use by assessing and retrofitting existing facilities with adequate lighting, playground equipment, bathroom amenities, and green space.
 - Policy 5.5: Improve walkability across the city by improving sidewalk quality and pedestrian accessibility through the implementation of the Complete Streets Plan.
 - Program 5.5.1: Adopt a Safe Routes to School Resolution as recommended in the 2019 Safe Routes to School Launch Program.

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- **Comment B.5:**

The EJ Element includes policies to address healthcare access. Examples of relevant policies from the EJ Element include:

- Policy 5.9: Explore the feasibility of developing local Fire House Clinics, which offer free primary and preventative healthcare services, at the two fire stations located in Huntington Park.
- Policy 5.10: Expand the route of the Huntington Park Express transit bus to direct transportation to clinics and hospitals in the City.
- Policy 5.1: Raise awareness about the local asthma risks and at-home mitigation strategies for reducing asthma risks in children and young adults.
- Policy 5.4: Develop City-sponsored nutritional education resources and programs to bolster the health of Huntington Park residents.

C. Food Access

- **Comment C.1:**

The EJ Element includes policies to support the diversity and availability of locally produced foods and bolster access to nutritionally adequate diet. Examples of relevant policies from the EJ Element include:

- Policy 3.2: Promote access to locally grown produce. Reduce barriers to establishing urban agriculture.
 - Program 3.2.1: Through the Department of Parks and Recreation, the City shall develop a community garden within each major neighborhood of the city by the year 2030.
 - Program 3.2.2: Through the Department of Parks and Recreation, the City shall partner with a local non-profit organization to open a secondary farmer's market in the Western portion of the City at Raul R. Perez Memorial Park by the year 2025.
 - Program 3.2.4. Encourage businesses at City farmer's markets to accept WIC and SNAP benefits as payment sources by offering incentives through the City's Business Assistance Program.
- Policy 3.3: Partner with local food banks and related non-profit organizations to develop city-sponsored food pantry programs by the year 2025.
- Policy 3.4: Collaborate with local public schools to develop "Edible School Yard" programs that support access to healthy produce and provide nutritional education by the year 2025.
- Policy 3.5: Broaden local programs related to nutrition and healthy food access through the Department of Parks and Recreation.

- **Comment C.2:**

The EJ Element includes policies to support low-income access to farmer's markets. The following program outlined within the EJ Element serves to support this goal:

- Program 3.2.4: Encourage businesses at City farmer's markets to accept WIC and SNAP benefits as payment sources by offering incentives through the City's Business Assistance Program.

- **Comment C.3:**

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The EJ Element includes policies to address food accessibility and community gardens. Examples of relevant policies from the EJ Element include:

- Policy 3.2: Promote access to locally grown produce. Reduce barriers to establishing urban agriculture.
 - Program 3.2.1: Through the Department of Parks and Recreation, the City shall develop a community garden within each major neighborhood of the city by the year 2030.
 - Program 3.2.2: Through the Department of Parks and Recreation, the City shall partner with a local non-profit organization to open a secondary farmer's market in the Western portion of the City at Raul R. Perez Memorial Park by the year 2025.
 - Program 3.2.4. Encourage businesses at City farmer's markets to accept WIC and SNAP benefits as payment sources by offering incentives through the City's Business Assistance Program.
- Policy 3.3: Partner with local food banks and related non-profit organizations to develop city-sponsored food pantry programs by the year 2025.
- Policy 3.4: Collaborate with local public schools to develop "Edible School Yard" programs that support access to healthy produce and provide nutritional education by the year 2025.
- Policy 3.5: Broaden local programs related to nutrition and healthy food access through the Department of Parks and Recreation.

D. Safe and Sanitary Homes

- **Comment D.1:**

The EJ Element includes policies to support tenants' rights and housing protections for vulnerable renters, including the development of programs to subsidize home maintenance, development of a rental-inspection program, and dissemination of information regarding tenant's rights. Examples of relevant policies from the EJ Element include:

- Policy 4.1: Protect renters from adverse living conditions by disseminating information and resources regarding tenants' rights and home safety.
- Policy 4.3: Connect residents with housing opportunities by developing an online portal that provides tenants with information on local housing resources and available rental properties within their neighborhood and price range
- Policy 4.4: Ensure Code Enforcement programs do not cause harm to vulnerable residents, especially undocumented residents, by ensuring that the Fair Housing Foundation follows up on all violations.
- Policy 4.5: Protect vulnerable renters that experience poor living conditions, including overcrowding, by requiring that Code Enforcement provide tenants with affordable housing resources through the Los Angeles County Housing Resource Center.

- **Comment D.2:**

The EJ Element includes policies to prioritize the production of affordable housing. Examples of relevant policies from the EJ Element include:

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- Housing Element Policy 1.1: Promote opportunities for homeownership to low- and moderate-income households through homebuyer assistance programs or inclusionary housing requirements that apply to ownership projects.
 - Housing Element Policy 2.2: Maintain affordability controls on government-assisted housing units in the City, through dedication of funds and partnerships with nonprofit housing providers to acquire and preserve units in projects with expiring affordability controls.
 - Housing Element Policy 2.4: Strengthen neighborhoods through a partnership with nonprofits in the acquisition and rehabilitation of deteriorated properties and provision of long-term affordable housing.
 - Housing Element Policy 1.2: Facilitate the development of missing-middle housing (accessory dwelling units, duplexes, triplexes, and small-lot subdivisions consistent with state law) to provide affordable housing opportunities in existing neighborhoods.
 - Housing Element Policy 2.10: Protect existing residents from displacement by expanding tenants' rights programs, enforcement, and legal assistance needed to access those rights.
- **Comment D.3:**

The EJ Element includes policies to reduce impacts from climate change and support safe and sanitary homes. Examples of relevant policies from the EJ Element include:

 - Housing Element Policy 2.5: Promote quality rental housing and strategies to address substandard conditions of units. Establish procedures to use the City's existing Code Enforcement program to hold landlords accountable for rental housing repairs. Dedicate funding to rental housing rehabilitation and connect owners of rental properties with code violations with funding programs.
 - Program 2.7.2: Coordinate with Los Angeles County to advocate for MERV-13 air filtration and high-quality air conditioning infrastructure at local public libraries to insulate the public during high heat and poor air quality days.
 - Policy 1.18: Encourage the use of ecologically based landscape design principles to support improved air quality by absorbing CO₂, producing oxygen, and providing shade that reduces energy required for cooling.
 - **Comment D.4:**

The EJ Element includes policies that address overcrowding and housing affordability. Examples of relevant policies from the EJ Element include:

 - Housing Element Policy 2.7: Ensure that all rental properties in Huntington Park are safe and sanitary by performing inspections of all new and existing rental units. Educate and train rental property owners on best practices for property management. Connect property owners with resources for owners of rental properties to assist with repairs and improvements.
 - Policy 4.10: Protect vulnerable renters that experience poor living conditions, including overcrowding, by requiring that Code Enforcement provide tenants with affordable housing resources through the Los Angeles County Housing Resource Center.
 - Policy 4.4: Ensure Code Enforcement programs do not cause harm to vulnerable residents, especially undocumented residents, by ensuring that the Fair Housing Foundation follows up on all violations.

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- Housing Element Policy 2.2: Maintain affordability controls on government-assisted housing units in the City, through dedication of funds and partnerships with nonprofit housing providers to acquire and preserve units in projects with expiring affordability controls.

- **Comment D.5:**

The EJ Element includes policies to support safe and sanitary housing in the City and protect vulnerable residents from retaliatory displacement. Examples of relevant policies from the EJ Element include:

- Housing Element Policy 2.7: Ensure that all rental properties in Huntington Park are safe and sanitary by performing inspections of all new and existing rental units. Educate and train rental property owners on best practices for property management. Connect property owners with resources for owners of rental properties to assist with repairs and improvements.
- Policy 4.4: Ensure Code Enforcement programs do not cause harm to vulnerable residents, especially undocumented residents, by ensuring that the Fair Housing Foundation follows up on all violations.
- Policy 4.10: Protect vulnerable renters that experience poor living conditions, including overcrowding, by requiring that Code Enforcement provide tenants with affordable housing resources through the Los Angeles County Housing Resource Center.

E. Physical Activity

- **Comment E.1:**

The EJ Element includes policies to support active transportation and transit use. Examples of relevant policies from the EJ Element include:

- Policy 2.5: Bolster access to public facilities and improve active transportation by expanding bicycle infrastructure across the city.
- Program 2.5.1: By 2030, develop an updated Bicycle and Transportation Master Plan that is focused on expanding safe, local bike routes and increasing regional connectivity
- Policy 5.5.: Improve walkability across the city by improving sidewalk quality and pedestrian accessibility through the implementation of the policies and programs outlined in the existing Complete Streets Plan.
- Program 5.5.1: Adopt a Safe Routes to School Resolution as recommended in the 2019 Safe Routes to School Launch Program.
- Policy 5.6: Collaborate with local schools to disseminate informational materials in a variety of languages that encourage the use of active transportation in school commutes.
- Policy 2.3: Improve accessibility to local public facilities and resources by expanding the HP Express to provide access to a wider variety of public facilities and exploring opportunities to subsidize ridership for residents of Huntington Park.

F. Civic or Community Engagement

- **Comment F.1:**

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The EJ Element includes policies to promote public participation. Examples of relevant policies from the EJ Element include:

- Policy 6.1: The Communications Department shall publish all outreach and public resource materials released by the City in English and Spanish.
- Policy 6.2: Provide translation services, upon request, at all public meetings that include services for those who speak Spanish, Mandarin Chinese, and Tagalog.
- Program 6.2.1: The Community Development Department and Communications Department shall provide instructions for requesting translation services on the City's Meeting webpage and on all meeting notification documents.
- Policy 6.3: The Community Development Department and Communications Department shall develop strategic partnerships with trusted community leaders and local non-profit organizations to ensure that community engagement reaches broad and diverse facets of the community.
- Policy 6.4: The Communications Department shall ensure that community meetings are held at times and in locations that are accessible to diverse community members in Huntington Park.
- Policy 6.5: The Community Development Department shall establish an understanding of the unique needs of all residents within Huntington Park, especially those who are underrepresented, by hosting a series of workshops focused on learning about community priorities.

- **Comment F.2:**

The EJ Element includes policies to promote public engagement participation for all residents and strengthen residents' capacity to participate in local decision-making processes. Examples of relevant policies from the EJ Element include:

- Policy 6.1: The Communications Department shall publish all outreach and public resource materials released by the City in English and Spanish.
- Policy 6.2: Provide translation services, upon request, at all public meetings that include services for those who speak Spanish, Mandarin Chinese, and Tagalog.
- Policy 6.3: The Community Development Department and Communications Department shall develop strategic partnerships with trusted community leaders and local non-profit organizations to ensure that community engagement reaches broad and diverse facets of the community.
- Policy 6.4: The Communications Department shall ensure that community meetings are held at times and in locations that are accessible to diverse community members in Huntington Park.
- Policy 6.5: The Community Development Department shall establish an understanding of the unique needs of all residents within Huntington Park, especially those who are underrepresented, by hosting a series of workshops focused on learning about community priorities.

- **Comment F.3:**

The EJ Element includes policies to engage with community members through workshop and other outreach mechanisms. Examples of relevant policies from the EJ Element include:

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- Policy 6.3: The Community Development Department and Communications Department shall develop strategic partnerships with trusted community leaders and local non-profit organizations to ensure that community engagement reaches broad and diverse facets of the community.
- Policy 6.5: The Community Development Department shall establish an understanding of the unique needs of all residents within Huntington Park, especially those who are underrepresented, by hosting a series of workshops focused on learning about community priorities.
- Program 6.5.1: Between the years 2022 and 2023, perform a Neighborhood Workshop Series, which involves workshops across the various neighborhoods in Huntington Park. The Neighborhood Workshop Series is to be focused on identifying the community priorities of residents within different areas of the city.
- Program 6.5.2: Using the Neighborhood Workshop Series, develop Neighborhood Plans that serve to outline small-scale projects, such as specific sidewalk improvements or community gardens, that can support the unique needs of each Huntington Park neighborhood.
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July 1, 2022

SUBMITTED VIA EMAIL

Steve Forster, Interim Community Development Director
Araceli Almazan, City Attorney
City of Huntington Park
6550 Miles Avenue
Huntington Park, CA 90255



Re: Comments regarding the City of Huntington Park’s Environmental Justice Technical Report

Mr. Forster and Ms. Almazan:

Communities for a Better Environment (“CBE”) submits these comments regarding the City of Huntington Park’s (“the City’s”) Environmental Justice Technical Report (“Technical Report”), issued in May 2022. CBE offers these comments supporting the development of a comprehensive Environmental Justice Element that addresses the needs of Huntington Park residents who are disproportionately impacted by a high pollution burden and institutional disinvestment. CBE has worked in the City of Huntington Park for nearly 30 years organizing with youth and adults. Not only is CBE and its members experts in environmental justice issues in Huntington Park, we were also involved in the creation of SB 1000 as a California Environmental Justice Alliance member.¹ As a result, moving forward we hope to work closely on the creation of the final Environmental Justice Element with the City.

The following recommendations highlight specific goals, programs, and policies the City should include in its Environmental Justice Element, based on the information gathered in the Technical Report and on CBE’s continued engagement with its members who live, work, and recreate in Huntington Park. Moreover, many of these recommendations draw from the California Office of Planning and Research’s Healthy and Environmentally Just Communities document, which highlights existing environmental justice goals, policies, and programs that have been adopted by municipalities across California.²

Pollution Exposure & Air Quality

- As the technical report correctly notes, residents in Huntington Park live with high levels of ozone, PM_{2.5}, and diesel particulate matter from high truck traffic in and around the City. CBE recommends the City adopt a policy in its Environmental

¹ California Environmental Justice Alliance is a statewide coalition of environmental justice advocates, <https://caleja.org/> (last visited July 1, 2022). CBE is a founding member of this coalition. CEJA is also a co-sponsor of SB 1000 (Leyva 2016).

² Cal. Office of Planning and Research, Healthy and Environmentally Just Communities, https://opr.ca.gov/docs/20181120-Draft_for_public_review_example_GPG_Policy_Language.pdf (last visited June 28, 2022).

Justice Element to limit diesel truck idling near sensitive receptors within certain times and designate truck routes that limit truck traffic near residential neighborhoods and other sensitive land uses.

- Figure 5 of the Technical Report highlights the clear disparity in pollution burden between residents living in the peripheries of the planning area—especially near the City of Vernon—and those living near the center of the planning area. As such, CBE recommends the City adopt a policy, similar to [Los Angeles County’s Green Zones Ordinance](#),³ creating air pollution buffers by zoning residences, schools, childcare facilities, elderly care facilities, parks, and health care facilities away from heavy industrial areas. The City should prohibit development of any of these sensitive uses in census tracts with a pollution burden above 80%, including tracts 6037532500, 6037532700, 6037533002, 6037533201, and 6037533501.
- The Technical Report found that the highest percentile of cleanup sites are located along the boundaries of the City’s planning area and that relatively disadvantaged communities have the highest cleanup site percentiles scores in Huntington Park. Therefore, CBE recommends that the City adopt a policy or program to remediate brownfield sites, based on residents’ input. The City’s remediation efforts should provide access to health-promoting goods and services, economic development, expansion of open spaces and parks, community gardens, cooling centers, and other similar community uses. The City should also adopt a policy to safeguard against housing development on brownfield sites without proper remediation and state oversight.
- Although the Technical Report finds that Huntington Park residents experience significantly elevated soil lead levels, it fails to mention the Exide battery-recycling facility as one of the main known sources of lead pollution in the area. The City must disclose this information and develop programs and policies tailored to this source of pollution. Strategies designed to remediate this source of lead pollution necessarily differ from those designed to address lead-based paint and lead-contaminated dust in older buildings. Consequently, CBE urges the City to create a working group with the California Department of Toxic Substances Control, community organizations, and interested residents with the goal of supporting outreach to residents regarding the ongoing cleanup and expediate the residential cleanup process in the City.
- CBE disagrees with the Technical Report’s conclusion that the City’s water supply is not significantly contaminated, relative to the rest of the state. Residents spend a significant portion of their incomes buying bottled water because they are unable to drink the brown-colored, murky tap water that comes out of their faucets. In fact, the [Environmental Working Group’s Tap Water Database](#)⁴ reports that there are a total of 29 contaminants found in the water serviced by the Huntington Park Water Department. Although the water meets federal drinking water standards, this does

³ L.A. County Dept. of Regional Planning, Public Hearing on the Green Zones Program, https://planning.lacounty.gov/assets/upl/project/greenzones_board-letter.pdf (last visited June 28, 2022).

⁴ Environmental Working Group, Huntington Park Water Department, <https://www.ewg.org/tapwater/system.php?pws=CA1910049> (last visited June 28, 2022).

not mean that the water meets the latest health protective guidelines. EPA has not updated many of these standards in almost 20 years. As such, CBE recommends that the City work with the Huntington Park Water Department and other municipal water providers that service residents in Huntington Park to ensure high quality drinking water for residents. The City should also adopt a policy to support the preparation of water quality and water management studies to ensure the continued provision of good quality water to residents.

Public Facilities

- The Technical Report correctly highlights the severe lack of parks in the City. The Draft Environmental Justice Element should include a policy encouraging the construction of new parks and open spaces near community facilities such as schools, senior centers, and recreational centers. The City should also expand public transportation routes to better service existing recreational facilities and site new parks in close proximity to homes. The City should also require that development of parks, trails, and open spaces occur concurrently with other area development.
- To increase the availability of open space to the extent possible, the City should adopt a policy that encourages joint-use agreements with school districts allowing the public to use recreational facilities on school property during non-school hours and, where feasible, coordinate with public entities granting easements to be used as parks and trails.
- To ameliorate the lack of bike lane infrastructure, the City should also prioritize the construction of protected bike lanes and implement street design features that facilitate walking and biking. The City should also adopt a Bicycle Master Plan to enhance bicycle circulation and planning.
- Given the high number of pedestrians and truck traffic in the City, CBE recommends that the draft Environmental Justice Element address pedestrian safety. The City should consider adopting a policy to create continuous, safe, and attractive pedestrian environment by improving street lighting, maintenance, and signage.
- The Technical Report failed to study the lack of health services located in the City. Given the high rates of cardiovascular and respiratory illnesses discussed in the Physical Activity section of the Technical Report, the City should ensure health clinics and hospitals are located throughout the City and are accessible via public transit. CBE recommends the City adopt a policy to ensure equitable distribution of health clinics, emergency services, dental care, and mental/behavioral health services. The City should also support access to improve health and social services for seniors, unhoused people, and young children and their families. Furthermore, the City should adopt policies to support the elimination of barrier for individuals with permanent and temporary disabilities and individuals with limited or no English proficiency to access healthcare and health resources.

Food Access

- The Technical Report’s correctly found that residents in Huntington Park experience more than double the rate of food insecurity compared to residents in Los Angeles County and the State. As such, the City should adopt policies to increase the diversity of locally produced foods offered at local grocery stores to give residents greater access to a healthy, nutritionally adequate diet.
- Many communities in the city are classified as low-income and have impaired access to the nearest supermarket or grocery store. Therefore, CBE recommends that the City adopt a policy to expand access to farmers’ markets that accept WIC and SNAP payments with expanded hours, in transit-accessible locations, and on public property with minimal cost to vendors.
- Furthermore, the City should encourage the production and accessibility of fresh produce by expanding community gardens and allowing small-scale urban agriculture in parks, schools, and neighborhoods. The City should also adopt policies that encourage and support the use of public lands for community gardens.

Safe and Sanitary Homes

- Access to safe and sanitary homes is deeply connected to residents’ ability to remain in their homes. Housing shapes people’s sense of community and connects them to the resources that sustain their lives. Without adequate housing protections, vulnerable renters will experience housing instability due to rising housing costs, gentrification, discrimination, and inadequately-maintained housing. To develop tenant protection measures that address the cost burdens experienced by renters in the City, CBE recommends that the City implement the goals, programs, and policies recommended in the [California Environmental Justice Alliance’s Environmental and Housing Justice Platform](#).⁵ In particular, CBE recommends the City strengthen its rent control policies beyond the statewide rent stabilization law, expand just cause provisions to cover all rental units, lower allowable rent increases, and close other loopholes.
- New development in the City related to construction of transit-oriented districts and the West Santa Ana Branch should prioritize the affordability needs of area residents. The City should adopt policies prioritizing the production of affordable housing and create anti-displacement zones to ensure existing residents remain in their communities.
- Climate change has disproportionate impacts on low-income, underserved communities. The City’s Environmental Justice Element must commit to investing in climate-resilient infrastructure for its residents. As such, CBE recommends adopting policies placing covenants on properties that receive public grants, requiring property owners to maintain affordable rents and pair building retrofit

⁵ Cal. Env’tl. Justice All., Environmental and Housing Justice Platform, https://calgreenzones.org/wp-content/uploads/2021/10/CEJA_GZ-EHJP-Full-Platform-Final.pdf (last visited June 28, 2022).

funds with affordable housing acquisition funds to convert distressed or vacant properties into climate-resilient housing.

- As the Technical Report correctly notes, the City experiences high rates of housing overcrowding. Overcrowding contributes to negative health outcomes, [including higher infection rates of COVID-19](#).⁶ As such, the City should adopt policies to reduce overcrowding in homes by increasing access to deeply affordable housing and subsidized housing options.
- As the City's housing stock continues to age, the City should ensure landlords maintain rental units in a safe, sanitary, and habitable condition. CBE recommends that the City adopt policies that provide timely and adequate responses to habitability complaints, regardless of whether tenants are current on rent or whether property owners have been responsive to the complaint. In addition, the City should adopt policies to ensure code enforcement actions do not result in retaliatory displacement of tenants, especially for undocumented tenants and other vulnerable populations.

Physical Activity

- The Technical Report correctly points to the high rates of asthma, obesity, and cardiovascular disease in the City and the ways in which historical land use patterns, inadequate access to open space, nutritious food, and multimodal transportation contribute to health disparities in the City. As such, the City's Draft Environmental Justice Element should include programs and policies that support the development of compact, transit-adaptive, and pedestrian and bicycle-friendly development patterns, and increase opportunities for active transportation and transit use.

Civic or Community Engagement

- CBE recommends the City adopt policies that encourage public participation by providing simultaneous Spanish translation services and listening devices for all meetings, using a variety of venues throughout the community, using participatory facilitation techniques, and using culturally appropriate approaches to public participation and involvement. The City should also consider adopting policies to hold meetings and workshops at times and locations that are accessible and convenient to community members. In particular, the City should adopt additional policies to engage with residents that may be directly affected by a particular decision.
- The City must engage with residents of all ages, but also specifically including people with disabilities and as well as seniors. Outreach must be done through multiple avenues of public outreach. Further, the City should adopt policies to build and strengthen residents' capacity to participate in local planning, governmental affairs, and policy decision-making.

⁶ Ben Poston, Tony Barboza, Ryan Menezes, *Southeast L.A. already faced many ills. Now it's the epicenter of coronavirus.*, L.A. Times (Aug. 6, 2020), <https://www.latimes.com/california/story/2020-08-06/newest-covid-19-cases-surge-in-southeast-la-county>.

- Finally, following the adoption of the Environmental Justice Element, the City should continue to hold regular community workshops and meet with neighborhood-specific citizen committees to solicit feedback on the City's planning activities.

Conclusion

CBE appreciates the opportunity to recommend goals, programs, and policies for the City's upcoming draft Environmental Justice Element. State law requires the development of specific and targeted goals, programs, and policies that allow residents to measure the benefits of the Environmental Justice Element. CBE looks forward to reviewing the draft Environmental Justice Element upon its release.

Sincerely,

Idalmis Vaquero
Jennifer Ganata
Attorneys for Communities for a Better Environment

CC: Erick H. Serrano and Kimiko Lizardi, Rincon Consultants
Mari Mayeda, Deputy Attorney General, Environmental Justice Bureau
Valerie Feldman and Melissa Morris, Public Interest Law Project
Navneet Grewal and Lucia Choi, Disability Rights California

Huntington Park Environmental Justice Element

Response to East Yard Communities comment letter dated September 6, 2022

Section A: Introduction

On September 6, 2022, the City of Huntington Park (“the City”) received a comment letter from East Yard Communities for Environmental Justice (“EYCEJ”) regarding the Draft Environmental Justice Element (“Draft EJ Element”).

Section B below provides responses to each of the written comments raised regarding the Draft EJ Element.

Section B: Response to Comments

A. Pollution Exposure and Air Quality

- **Comment A.1:**

Thank you for the comment. A ‘Definitions’ section will be added to the Element prior to final adoption.

- **Comment A.2:**

Thank you for your comment. These suggestions have been considered during the Element development process. A policy addressing indigenous engagement will continue to be considered prior to final adoption.

- **Comment A.3:**

Thank you for your comment. These suggestions have been considered during the Element development process. The following policy is included in the EJ Element to disseminate information about companies in or near Huntington Park that are in violation of State or agency rules:

- Program 1.8.2: Starting in 2023, the Community Development Department shall develop a report identifying solid waste and hazardous waste operations that are non-compliant, in-violation, or undergoing existing mitigation. This report shall be published on the City’s webpage for public consumption in English and Spanish.

- **Comment A.4:**

Thank you for your comment. Hazardous waste facilities were addressed in the following EJ Element policies:

- Policy 1.8: Coordinate with local solid waste and hazardous waste operators to develop site-specific upgrades that reduce pollution exposure beyond the minimum regulatory standards.
- Program 1.8.1: Coordinate with all solid waste and hazardous waste operators that are non-compliant, in-violation, or undergoing existing mitigation, to facilitate a resolution to existing issues and establish interim strategies for insulating the community from impacts.
- Program 1.8.2: Starting in 2023, the Community Development Department shall develop a report identifying solid waste and hazardous waste operations that are non-compliant, in-

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violation, or undergoing existing mitigation. This report shall be published on the City's webpage for public consumption in English and Spanish.

- Policy 1.9.: Insulate the communities in the northern and western peripheries of the city from hazardous waste and solid waste facility impacts by developing a targeted task force focused on limiting industrial pollution exposure.

- **Comment A.5:**

Thank you for your comment. These suggestions have been considered during the Element development process.

- **Comment A.6:**

Thank you for your comment. The Industrial Pollution Task Force is further defined in Program 1.9.1.

- **Comment A.7:**

Thank you for your comment. These suggestions have been considered during the Element development process.

B. Public Facilities

- **Comment B.1:**

Thank you for your comment. The Housing Element and EJ Element include policies to support low income housing in Huntington Park. Examples of relevant policies from the Draft EJ Element include:

- Housing Element Policy 2.4: Strengthen neighborhoods through a partnership with nonprofits in the acquisition and rehabilitation of deteriorated properties and provision of long-term affordable housing.
- Housing Element Policy 2.2: Maintain affordability controls on government-assisted housing units in the City, through dedication of funds and partnerships with nonprofit housing providers to acquire and preserve units in projects with expiring affordability controls.
- Housing Element Policy 1.1: Promote opportunities for homeownership to low- and moderate-income households through homebuyer assistance programs or inclusionary housing requirements that apply to ownership projects.
- Policy 4.2: Increase the development of affordable housing across the city by adopting zoning and incentives that promote the construction of affordable developments, consistent with the City's Housing Element.

- **Comment B.2:**

Thank you for your comment. These suggestions have been considered during the Element development process.

- **Comment B.3:**

Thank you for your comment. These suggestions have been considered during the Element development process.

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C. Food Access

- **Comment C.1:**

The EJ Element includes policies to support access and affordability of healthy groceries, including promoting affordability at local farmer's markets. Examples of relevant policies from the EJ Element include:

- Policy 5.4: Develop City-sponsored nutritional education resources and programs to bolster the health of Huntington Park residents.
- Program 5.4.1: By 2025, Establish a nutritional education campaign that includes nutritional cooking courses, collaboration with farmer's markets, and utilization of community gardens. Pursue partnership with the Los Angeles Department of Public Health.
- Program 3.2.4: Encourage businesses at City farmer's markets to accept WIC and SNAP benefits as payment sources by offering incentives through the City's Business Assistance Program.

D. Safe and Sanitary Homes

- **Comment D.1:**

The Housing Element of the General Plan addresses anti-displacement strategies, increasing the supply of affordable housing, and addressing substandard housing conditions. In addition, the Housing Element provides for affordable housing opportunities throughout the city, including policies and programs to incentivize, streamline, and support the development of affordable housing.

E. Physical Activity and Community Health

- **Comment E.1:**

Thank you for the comment. A policy addressing walking audits will continue to be considered prior to final adoption.

- **Comment E.2:**

Thank you for the comment. A policy addressing indigenous engagement will continue to be considered prior to final adoption. With regard to native tree canopy, Policy 1.4.2 directs the use of appropriate species when expanding tree canopy in order to ensure that trees are hospitable to the environment yet provide enough canopy to meet community need.

F. Civic or Community Engagement

- **Comment F.1:**

Thank you for the comment. American Sign Language (ASL) has been incorporated into Policy 6.2 of the EJ Element.

- **Comment F.2:**

Thank you for the comment. Members of the Advisory Committee will be carefully chosen to include representatives from different facets of the Huntington Park community.

- **Comment F.3:**

Huntington Park Environmental Justice Element

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Thank you for the comment. The EJ Element includes policies and programs to promote public awareness surrounding the implementation of the EJ Element. In addition, the EJ Element contains policies and programs to gather feedback on community-specific needs through a Neighborhood Workshop Series. Examples of relevant policies from the EJ Element include:

- Policy 6.5: The Community Development Department shall establish an understanding of the unique needs of all residents within Huntington Park, especially those who are underrepresented, by hosting a series of workshops focused on learning about community priorities.
- Program 6.5.1: Between the years 2022 and 2023, perform a Neighborhood Workshop Series, which involves workshops across the various neighborhoods in Huntington Park. The Neighborhood Workshop Series is to be focused on identifying the community priorities of residents within different areas of the city.
- Program 6.5.2: Using the Neighborhood Workshop Series, develop Neighborhood Plans that serve to outline small-scale projects, such as specific sidewalk improvements or community gardens, that can support the unique needs of each Huntington Park neighborhood.
- Program 6.7.2: The City's Community Development Department shall publish an annual report on the status of the implementation of the Environmental Justice Element policies and programs as part of the General Plan Annual Report. The Environmental Justice Advisory Committee shall review the Environmental Justice component of the General Plan Annual Report to ensure continued efforts towards policy implementation.

September 6, 2022

Sergio Infanzon
Director of Communications and Community Relations
City of Huntington Park
sinfanzon@hpca.gov

Steve Forster
Director of Community Development
City of Huntington Park
sforster@hpca.gov

Dear Mr. Forster & Mr. Infanzon,

On behalf of East Yard Communities for Environmental Justice (EYCEJ) and our members, we submit these comments for consideration in regards to the Huntington Park Environmental Justice Element. EYCEJ is a community-based organization that was founded and established by residents in the City of Commerce in 2001. Our members are residents who are active on issues of environmental justice, including air, water, and soil pollution, transportation, freight, and land use. EYCEJ has consistently participated in the Environmental Justice Advisory Committee to inform this plan and we have had multiple conversations with members to strengthen the current draft EJ element.

Subjects for Consideration

Pollution and Air Quality

- 1.3 The word insulate is used multiple times; we believe it is important to define this word in the document.
- 1.4 Urban greening is cited in this goal; we recommend the city of Huntington Park include removing concrete and engage with indigenous leaders and organizations as part of the urban greening process.
- 1.7 In addition to disseminating information about residential lead pollution, the EJ element should include disseminating information about companies in and near Huntington Park who are in violation of city or agency rules. This is particularly critical if the violation has a harmful impact on human health.
- 1.9 While we agree that local solid waste facilities should be monitored; this should expand to any company under regulation by environmental agency, including, but not

¹ <https://lowerlariver.org/wp-content/uploads/2018/02/Community-Stabilization-Toolkit.pdf>

limited to EPA, AQMD, DTSC, MWD, CalRecycle, etc. Furthermore, while this policy cites assessing and identifying non-compliant operators, this policy should include the action steps taken for these identified operators, including issuing city citations or removal of permits. It is ironic that this policy does not name hazardous facilities, though they are cited in the policies below.

- 1.10 We highly recommend this policy be edited to keep industries/companies accountable, rather than use resources to get them into compliance. Companies can already reach out to environmental agencies to support them to get into compliance; the cities primary responsibility should be to protect the health of Huntington Park residents.
 - Where upgrades may cause harm or increase capacity of the site, there should be an environmental analysis per state guidelines AND a Health Impact Assessment (HIA) that the city must consider in the permitting of changes to the site.
- 1.11- Limiting industrial pollution exposure in the Northern and Western peripheries in the city should include revisiting the land use designation for this area and consider rezoning where possible. One tool that may be used for this process is amortization-phasing out polluting industries that cannot be compliant or where land use has been changed.
 - Define Industrial Pollution task force- we recommend the taskforce prioritize, if not exclusively be made up of HP residents and HP workers who live in the city. We recommend elected officials nor people who would have conflict of interest with industry form part of the taskforce.
- 1.13- While citing CERP implementation is a great first step, this policy should include a clear priority process and workflow for staff to adopt CERP measures; with an annual evaluation of this implementation.

Public Facilities and Accessibility

- 2.5.2- To ensure housing availability for current Huntington Park residents, and considering the current data showing low-income population in the city, we recommend that any additional density needs to prioritize very low income housing.
- 2.8- This policy should specify how water & sewer systems will be assessed. We recommend that the policy go beyond assessment and identify opportunities for water reclamation (such as what exists in Salt Lake Park), water capturing, and other water solutions outlined below:
 - Collaboration with local Tongva tribe
 - For full plans and projects
 - To create policy that promotes land back, water back, and cultural and spiritual ceremonies access at zero cost for local Tongva natives
 - For planting of native plant & drought resistant plants that are managed in a pesticide and chemical free process

¹ <https://lowerlariver.org/wp-content/uploads/2018/02/Community-Stabilization-Toolkit.pdf>

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- Water healing– carrying the responsibility to ensure more water isn't being stolen from indigenous lands and also, that water is treated as sacred and with respect
 - Engagement of community from the very beginning of a project proposal and ongoing programming
 - Ensuring 100% of water is from local & healthy water sources
 - Protecting water from contamination and cleaning (i.e. filtration and treatment facilities) any water and water sources
 - Local water capture & recycling programs (i.e. cisterns, bioswales, natural filtration systems)
- Policy recommendations on access and safety
 - Environmental Justice includes having access to and feeling safe in green spaces. Currently, the city has a notable policy presence at green spaces, including a robot, which has been known to capture surveillance that could be given to a third party. We urge this EJ element to remove policing and increase intervention services at green spaces across Huntington Park.
 - Traffic calming measures should be included in this policy, including but not limited to tree canopies, speed bumps, and best practices of other cities.

Food Access

- 3.2 - We fully support farmers market as a way to encourage healthy and safe produce; however, HP community members have noted that produce is expensive. Though there are low-income programs on site, we have witnessed consistent long lines and request more low income programs connected to produce affordability be implemented at the existing and any additional farmers market.
 - We encourage the city to partner with local food vendors to establish pop-up sites throughout the city for community residents who may not have access to transportation.

Safe and Sanitary Homes

- We recommend the city include a policy that adopts community stabilization protections (TOPA, just cause, rent control). This is a common idea already approved by cities along the Lower LA River in the Community Stabilization Toolkit¹

Physical Activity and Community Health

- 5.5 Walkability plans should include ongoing community engagement and we recommend doing this through walking audits with community residents. It is also important to ensure ADA compliance.
- 5.7 We fully support increasing tree canopy and plant vegetation; and ask the city improve this policy by consulting with indigenous people by building relationship to ensure trees & plants are native.

¹ <https://lowerlariver.org/wp-content/uploads/2018/02/Community-Stabilization-Toolkit.pdf>

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Civic Engagement

- 6.2 Please include American Sign Language (ASL) in the list of languages provided for interpretation.
- 6.7 The EJ advisory committee should review and re-assess who participates, how many people, and how are they chosen. We highly encourage the majority of the committee consist of community members.
- We strongly encourage the city to lead regularly scheduled dialogues with community regarding the implementation of the EJ element that is community friendly and includes food, child watch and interpretation.

We are excited to see more Environmental Justice Elements in city plans across Southeast Los Angeles. East Yard encourages the city of Huntington Park to think boldly through some of the recommendations provided above to address the critical and intersectional issues currently harming HP residents, as only a bold plan will create significant progress for our community.

Kind Regards,



Laura J. Cortez

East Yard Communities for Environmental Justice

lcortez@eycej.org

Huntington Park Environmental Justice Element

Response to Communities for a Better Environment comment letter dated August 13, 2022

Section 1: Pollution Burden

Disadvantaged communities are defined on page 3.

Time frames and specific commitments added to all programs.

The policies and programs in the Goals and Policies, Pollution and Air Quality, section mitigate and/or eliminate the harm from pollution exposure, as well as Housing Element policies and programs referenced in that section.

Policies and programs that would provide resources to residents to protect themselves from pollution exposure are targeted to lower-income and disabled residents, many of whom are also lower income. Policy 1.12 protects sensitive uses from pollution exposure, in particular housing for people with disabilities.

Policy 1.10 would create air pollution buffers along major commercial routes.

Policy 1.14 would support redevelopment of industrial sites to non-polluting uses. Policy 1.15 would create a working group to expedite remediation of the Exide site. The Housing Element contains policies and programs to transition polluting uses to residential uses. Both the Environmental Justice Element and the Housing Element contain programs to seek funding to incentivize the clean up and transition of industrial sites.

Section 2: Public Facilities

Housing Element programs referenced in the Environmental Justice Element would create a comprehensive open space and urban greening plan to increase green space in the city.

Policy 1.15 would create a working group as referenced in the comment letter, and other policies and programs would provide incentives to redevelop brownfield sites. Anti-displacement policies are in the Housing Element, and referenced in the Environmental Justice Element.

Housing Element programs would create a comprehensive active transportation plan, addressing bike and pedestrian access in the city.

The development and need for resiliency hubs will be analyzed and addressed in the Safety Element update.

Section 3: Food Access

Timeline for implementation and specific details about implementation have been added to all programs.

Policies encourage providers to accept WIC and SNAP payments, but the city lacks the jurisdiction to require that they do so. Policies and programs would support the development of supermarkets and grocery stores, and the development of community gardens and gardens in public space.

Policy 3.3 would create a city-sponsored food pantry in conjunction with community-based organizations.

Huntington Park Environmental Justice Element

Response to Communities for a Better Environment comment letter dated August 13, 2022

Section 4: Safe and Sanitary Homes

The Housing Element addresses many of the issues in the comment letter, including anti-displacement strategies, increasing the supply of affordable housing, and addressing substandard housing conditions.

The Housing Element provides for affordable housing opportunities throughout the city, but the feasibility of a 50 percent affordability threshold for all projects was not supported through stakeholder outreach or analysis. Instead, the Housing Element contains policies and programs to incentivize, streamline, and support the development of affordable housing.

The Housing Element contains in-depth analysis of how housing and environmental conditions affect protected classes disproportionately, and contains policies and programs to address disproportionate need, per Housing Element law.

Programs and policies addressing overcrowding are in the Housing Element, many of which are cross-referenced in the Environmental Justice Element. Housing Element policies encourage larger unit sizes.

Safe and sanitary homes policies are in the Housing Element, and cross-referenced in the Environmental Justice Element. Policies addressing climate change adaptation more broadly will be developed during development of the Safety Element.

Policy 1.16 addresses drinking water safety.

Section 5: Physical Activity and Health

Housing Element Program 14 (cross referenced in the Environmental Justice Element) would create a comprehensive open space plan. All segments of the community, including people living with disabilities, will be consulted as part of that planning process.

Section 6: Civic Engagement and Demographics

Additional details regarding community outreach for the Environmental Justice Element can be added prior to adoption.

Policy 6.1 and 6.2 ensure access to public meetings and materials for Spanish-speaking residents.

August 13, 2022

SUBMITTED VIA EMAIL

Steve Forster, Interim Community Development Director
Araceli Almazan, Deputy City Attorney
City of Huntington Park
6550 Miles Avenue
Huntington Park, CA 90255

Re: Comments regarding the City of Huntington Park’s Draft Environmental Justice Element

Mr. Forster and Ms. Almazan:

Communities for a Better Environment (“CBE”), Disability Rights California (“DRC”), and Public Interest Law Project (“PILP”) submit these comments regarding the City of Huntington Park’s (“the City”) Environmental Justice Element (“EJ Element”), issued in July 2022. CBE reincorporates our comments regarding the City’s Environmental Justice Technical Report sent on July 1, 2022 (*See* Attachment 1) and we include these additional comments in response to the goals, programs, and policies presented in the EJ Element.

As previously discussed in meetings with the City and Rincon Consultants, the City should re-notice the public regarding the release of the Spanish-translated EJ Element with the new deadline for Spanish comments. The Office of Environmental Health Hazard Assessment’s CalEnviroScreen (“CES”) 4.0 tool shows that census tracts in the City fall between the 84th and 99th percentile for linguistic isolation, indicating that the City has a higher percentage of linguistically isolated communities than other census tracks in California.¹ The importance of ensuring that these language communities can participate in the EJ Element process is reflected in the City’s Memorandum of Understanding with the California Attorney General’s Office (“AG’s MOU”), which requires Spanish translation of all documents and notices related to the EJ Element. The Spanish-translated EJ Element was released on August 4, 2022, more than a month after the release of the English version on July 1, 2022. In order to allow the monolingual Spanish speaking citizenry of Huntington Park to participate, we ask that the City allow for a 45-day comment period running from August 4, 2022 to September 18, 2022. This additional time would give Spanish-speaking residents to the same opportunity to read and provide comments on the EJ Element.

In addition to the comments regarding each required section under SB 1000, the EJ Element should incorporate two overarching principles. First, the City has a duty to affirmatively

¹ Cal. Office of Envntl. Health Hazard Assessment, Linguistic Isolation, <https://oehha.ca.gov/calenviroscreen/indicator/linguistic-isolation> (last visited August 5, 2022). Linguistic isolation is a term used by the US Census Bureau for limited English speaking households. More than 40 percent of Californians speak a language other than English at home. About half of those do not speak English well or at all.

further fair housing in all of its “activities and programs relating to housing and community development”²; the state and federal anti-discrimination framework underlying the EJ Element requirements reflects a similar mandate.³ The EJ Element includes numerous housing and/or community development activities and programs. To comply with this mandate, the EJ Element should be revised to analyze and concretely describe how each program would counteract the disproportionate environmental harms that members of protected classes face. If the programs do not adequately address the particular harms to protected classes; they should be revised to do so. For example, **Program 4.3.1.** should be revised to include inspections of rental units to ensure compliance with mobility and communication accessibility features under California Building Code Ch. 11B for housing provided by, for, or on behalf of a public entity, or as part of a public entity’s program to provide housing.⁴

Secondly, the AG’s MOU requires the City to design environmental justice policies that provide real benefits to the City’s disadvantaged communities.⁵ These policies must be enforceable and must include specific actions to reduce community burdens.⁶ Therefore, the City should revise the EJ Element to ensure that its goals, policies, and programs in every required section have concrete timelines and actions that will allow the public to track its progress and statutory compliance.

I. Pollution Burden

While it is correct to note that the City’s census tracts all qualify as Disadvantaged Communities⁷, it might be helpful to give a precise description of “disadvantaged community.” Many of the City’s census tracts score within the 90th percentile for pollution burden, which means that residents are exposed to more pollution than 90 percent of census tracts in the State. The City should make strides in educating residents as to this type of exposure and craft policies that effectively reduce the amount of pollution.

The EJ Element focuses on air pollution burden in the City⁸ even though the CES tool shows that the City is impacted by multiple sources of pollution that range from air pollution, to contaminated drinking water to lead exposure in housing. Overall, the City’s proposed policies and programs lack detail about the actions the City will take and the timeline for implementing the programs. For example, **Program 1.4.1.** and **Program 1.11.1.** commit the City to establish a task force or working group to consider a particular problem, but do not provide a deadline for when the task force will be established, a deadline for when their work will be complete, how

² Cal. Gov. Code section 8899.50.

³ Cal. Office of Planning and Research, General Plan Guidelines Chapter 4: Required Elements, p. 4-5, https://opr.ca.gov/docs/20200706-GPG_Chapter_4_EJ.pdf (last visited August 5, 2022).

⁴ Cal. Dept. of Housing and Community Development, Affirmatively Furthering Fair Housing: Guidance for All Public Entities and for Housing Elements, (April 2021) at 37, https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf.

⁵ AG’s MOU at Section C, ¶ 2.

⁶ *Ibid.*

⁷ City of Huntington Park, Environmental Justice Element at 3.

⁸ *Ibid.* at 5.

one can become a member of this task force, any detail about what topics will be under the purview of the task force, and details about how the taskforce’s recommendations or conclusions will be made public.

Though the policies and implementing programs state the City will provide information to residents about pollution and other environmental harms, they do not also commit to programs to mitigate or eliminate these harms. For instance, **Policy 1.3.** commits to making air quality information available to the public and **Policy 1.7.** commits to providing information about the risk of lead pollution, but the policies and programs include little detail about what adaptation resources will be made available to residents. **Program 1.3.2.** should read “dedicated to the air quality index in Huntington Park...”

Furthermore, the City should include policies and programs that address the pollution exposure people with disabilities experience. The percentage of people with disabilities living in areas with greater exposure to PM_{2.5} is significantly higher than in areas with less exposure, even when controlling for other variables; this is especially true for individuals with cognitive and independent living difficulties.⁹ This is true in Huntington Park as well – the City’s Housing Element, at page 6-38, states that almost 20 percent, or 7,188, of Huntington Park’s residents have a disability, including 5,167 persons who are between the ages of 21 and 64. This is higher than the general population with a disability, which according to the 2018 American Community Survey, is 10.4% for California.

Critically, “[p]eople with disabilities are specifically exposed to and vulnerable to environmental injustice as a result of ableism” and some are also more vulnerable to environmental injustice because of the nature of their disability.¹⁰ Environmental injustice can also create disabling conditions.¹¹ For example, childhood lead poisoning, which impacts mental health and neurocognitive abilities, disproportionately affects people in racially segregated housing.¹² Furthermore, as the intensity and frequency of heat waves and wildfires continue to manifest as a result of the climate crisis, the elderly, people with disabilities, and people with chronic respiratory conditions will suffer the most from poor air quality, while facing serious barriers to obtaining adequate emergency assistance.

Therefore, the City should include EJ policies that specifically address the needs of the elderly, people with disabilities, and people with chronic respiratory conditions including establishing a program to distribute air conditioning to these vulnerable populations. **Program 1.2.1** should also be expanded to prioritize elderly residents and residents with disabilities access to in-home HEPA air filters at little or no costs. Furthermore, the City should explore an EJ policy, similar to Los Angeles County’s Green Zones Ordinance, to create air pollution buffers to

⁹ Jayajit Chakraborty, Disparities in exposure to fine particulate air pollution for people with disabilities in US, *Science of the Total Environment* (June 2022), <https://pubmed.ncbi.nlm.nih.gov/35750189/>.

¹⁰ Catherine Jampel, Intersections of disability justice, racial justice, and environmental justice, *Environmental Sociology* (2018), <https://par.nsf.gov/servlets/purl/10058562>.

¹¹ *Ibid.*

¹² *Ibid.*

prevent the future zoning of residences, schools, childcare facilities, elderly care facilities, parks, and health care facilities away from heavy industrial areas.

The Pollution section should also include policies that address other polluting sources, including water quality. Per the CES there are groundwater threats in the City as well as multiple toxic release sites listed in Envirostor.¹³ The presence of these sites requires further discussion and policy creation as to how the City will manage polluting facilities and how to protect the City's residents from pollution discharge.

II. Public Facilities

One of the key community amenities lacking in the City is availability to green spaces. Despite the limited land available to develop parks and other green spaces, there are several programs and policies that the City could implement in the EJ Element to increase green spaces. In addition to **Policy 2.2.** and **Policy 2.10.**, the City should propose policies and programs to work with local stakeholders and the Department of Toxic Substances Control to develop best practices for developing parks on brownfields. These policies should also be paired with anti-displacement measures to reduce the potential of green gentrification, a process involving the increase housing cost and the influx of new, wealthier, and often white residents, in low-income communities of color.¹⁴ Such policies are a critical component of affirmatively furthering fair housing.

Historic disinvestment in the City has resulted in a lack of bike paths and unsafe streets for pedestrians. At the same time, the high truck traffic in and around the City's peripheries make bike riding extremely dangerous. The City EJ policies should reflect the need for careful planning of the location of and safety features that would allow residents to commute and recreate safely. Therefore, **Policy 2.7.** should clarify that future bike infrastructure consider safety concerns, including the use of protected bike lanes. **Program 2.7.1.** should also include a timeline and year by which the Bicycle and Transportation Master Plan would get adopted.

In addition to expanding the operating hours at the Huntington Park Library under **Policy 2.9**, the EJ Element should also prioritize the development of critical public resources including, libraries, hospitals, clinics, and cultural centers. We encourage the City to create a policy specifically prioritizing the development of resiliency hubs, which are facilities that are easily accessible for heating, cooling, and shelter during climate-related emergency events.¹⁵

¹³ Cal. Dept. of Toxic Substances Control, EnviroStor, <https://www.envirostor.dtsc.ca.gov/public/> (last visited August 5, 2022). There are multiple sites listed in Huntington Park which need remediation or some type of evaluation. EnviroStor is the Department of Toxic Substances Control's data management system for tracking our cleanup, permitting, enforcement and investigation efforts at hazardous waste facilities and sites with known contamination or sites where there may be reasons to investigate further.

¹⁴ Alessandro Rigolon & Jon Christensen. Greening Without Gentrification, INSTITUTE OF THE ENVIRONMENT AND SUSTAINABILITY AT UCLA, <https://www.ioes.ucla.edu/wp-content/uploads/Greening-without-Gentrification-report-2019.pdf>.

¹⁵ NorCal Resiliency Center, About the Resiliency Hubs Initiative, <https://norcalresilience.org/resilient-hub-initiative/> (last visited August 5, 2022).

III. Food Access

The City correctly notes that lack of access to healthy foods can impact health outcomes and quality of life. Huntington Park experiences more than double the rate of food insecurity compared to county and statewide statistics. However, the city's proposed policies are lacking in both details and substantive actions that will mitigate this issue.

While the City has taken great lengths to explain the nature of the issue, the only proposed solutions are to increase food banks, food pantries, and free community gardens within Huntington Park. There is no proposed timeline for implementation nor details in the policies to address the severity or scope of the issue.

To increase residents' access to healthy, nutritionally adequate meals, the City should adopt policies that will increase the diversity of locally produced foods offered at local grocery stores. Additionally, to address impaired access to supermarkets or grocery stores, the City should adopt policies to expand access to farmers' markets that accept WIC and SNAP payments with expanded hours, in transit-accessible locations, and on public property with minimal cost to vendors.

We agree with the City's proposal to increase access to community gardens in Huntington Park, as there are currently none in the City. However, the City fails to detail how they intend to accomplish this. We propose that the City adopt an ordinance to permit community gardens by-right to encourage small-scale urban agriculture in parks, schools, and neighborhoods. Additionally, the City should adopt policies that encourage and support the use of public lands for community gardens.

COVID-19 demonstrated that many individuals who are older or disabled have barriers to leaving their homes for groceries; emergency food delivery programs were a critical lifeline to these households. The EJ Element should, therefore, propose a program to increase food access to older and people with disabilities with a city-run food delivery program.

IV. Safe and Sanitary Homes

As mentioned in our EJ Technical Report comment letter, the EJ Element should propose programs and policies that encourage community stability to ensure that residents have access to safe and sanitary homes. Without adequate housing protections, vulnerable renters will experience housing instability due to rising housing costs, gentrification, discrimination, and inadequately-maintained housing. In particular, we recommend the City strengthen its rent control policies beyond the statewide rent stabilization law, expand just cause provisions to cover all rental units, lower allowable rent increases, and close other loopholes. Critically, evidence demonstrates that anti-displacement measures are necessary to prevent re-segregation in communities with increasing development, and therefore necessary to affirmatively further fair housing in communities at risk of gentrification.¹⁶

¹⁶ Cal. Housing Partnership and Urban Displacement, Rising Housing Costs and Re-Segregation in the San Francisco Bay Area (2021) at 3, https://www.urbandisplacement.org/wp-content/uploads/2021/08/bay_area_re-segregation_rising_housing_costs_report_2019.pdf.

The City should adopt a policy to ensure that any upcoming transit-oriented development, including projects resulting from the construction of the West Santa Ana Branch, provide at least 50% of expected housing units for affordable housing. Requiring a percentage of affordable housing in transit-oriented development can begin to undo racial and social segregation and increase investment in underserved communities.¹⁷ In addition also affirmatively furthering fair housing, this type of policy would help reduce vehicle miles traveled and greenhouse gas emissions, effectively decreasing air pollution in the City and helping the State reach its carbon neutrality goals.¹⁸

The EJ Element should also include a more in-depth assessment of how EJ impacts different protected classes and how to ensure that the goals outlined would remedy the disproportionate harms caused to those groups. For example, while we appreciate that **Goal 4.4** seeks to increase affordable housing, that housing must also be accessible to individuals with a variety of disabilities given their disproportionate representation in HP and other EJ communities (e.g. mobility, mental health, cognitive/independent living, etc.). Or, as another example, the City should consider whether, to make other habitability-related programs accessible, it should also include funds to provide the modifications or assistance necessary for people with disabilities to use those programs.

Despite the discussion of overcrowded housing in the City, there are few programs and policies that would help the City address this issue. We urge the City to prioritize building larger units for families and multi-generational households as part of the EJ Element to provide these specific populations more appropriate housing options in the City.

We also ask for policies that increase housing quality and improve residents' ability to live safely in their homes during heat waves as the impacts of climate change intensify, including passing an ordinance to require air conditioning in new and remodeled housing units.

The City should also consider adopting a policy to improve the quality of drinking water in homes. As such, CBE recommends that the City work with the Huntington Park Water Department and other municipal water providers that service residents in Huntington Park to ensure high quality drinking water for residents. The City should also adopt a policy to support the preparation of water quality and water management studies to ensure the continued provision of good quality water to residents.

V. Physical Activity and Health

Environmental injustice has direct health impacts, as demonstrated by the high percentile scores of cardiovascular diseases and asthma residents experience. The dire need to improve the community's health outcomes requires the City to adopt policies that go beyond raising awareness and creating educational materials. We urge the City to revise its policies and programs under this section to include more concrete timelines to ensure these policies are met. For example, the City

¹⁷ Cal. Dept. of Housing and Community Development, *supra*, at 41.

¹⁸ Cal. Air Resources Bd., Draft 2022 Scoping Plan: Appendix E Sustainable Communities (May 2022) at 7, https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp-appendix-e-sustainable-and-equitable-communities_0.pdf.

should provide a deadline by which it plans to complete an annual audit of existing park facilities and by when upgrades will be made under **Program 5.3.1**. The City should also revise **Program 5.3.2** to provide a deadline by which it plans to perform an update of the City’s Park and Recreation Master Plan. The revised EJ Element should also include a discussion of the 2019 Safe Routes to School Launch Program to provide the public an understanding of the basis for adopting **Program 5.5.1**. This program should also be revised to include steps that will be taken and a timeline for the resolution’s adoption.

We also urge the City to meet with disability rights community groups in the area to identify strategies and additional recreational programs that could best benefit residents with disabilities under **Program 5.2.1**. EJ Element policies to upgrade sidewalks and plants trees should ensure these modifications are accessible to people with mobility or vision disabilities.

VI. Civic Engagement and Demographics

The Draft EJ Element describes the dates of various outreach efforts but not number of people reached who engaged in the process. The City should plan additional events or find partners to work with that can help in outreach efforts if the prior events were poorly attended. CBE reiterates its commitment to collaborate with the City to improve outreach and participation in future Environmental Justice Element and Housing Elements workshops. As a trusted environmental justice organization in the community, CBE request the City include consultation with CBE as part of **Policy 6.3**.

While we appreciate the rationale behind **Policy 6.1.**, we encourage the City to publish Spanish-translated outreach and public resources materials at the same time as English materials. We also encourage the City to translate all general planning materials, including housing element and other elements updated in the future into Spanish. In addition to translating the materials, we ask that the City establish practices to make these translated materials easily accessible to the public, including placing links of these materials on the City website’s homepage.

Conclusion

CBE, DRC, and PILP appreciate the opportunity to comment on the City’s Draft EJ Element. In addition to adopting the recommendations in this comment letter, we encourage the City to reach out to our organizations and other local organizations to ensure that the EJ Element addresses the needs of all residents. We look forward to collaborating with the City on this matter and reviewing the final EJ Element when it is released.

Sincerely,

/s/

Jennifer Ganata
Idalmis Vaquero

Navneet Grewal
Lucia Choi

Valerie Feldman
Melissa Morris

Communities for a Better Environment

Disability Rights California

Public Interest Law Project

Attachment 1

July 1, 2022

SUBMITTED VIA EMAIL

Steve Forster, Interim Community Development Director
Araceli Almazan, City Attorney
City of Huntington Park
6550 Miles Avenue
Huntington Park, CA 90255



Re: Comments regarding the City of Huntington Park’s Environmental Justice Technical Report

Mr. Forster and Ms. Almazan:

Communities for a Better Environment (“CBE”) submits these comments regarding the City of Huntington Park’s (“the City’s”) Environmental Justice Technical Report (“Technical Report”), issued in May 2022. CBE offers these comments supporting the development of a comprehensive Environmental Justice Element that addresses the needs of Huntington Park residents who are disproportionately impacted by a high pollution burden and institutional disinvestment. CBE has worked in the City of Huntington Park for nearly 30 years organizing with youth and adults. Not only is CBE and its members experts in environmental justice issues in Huntington Park, we were also involved in the creation of SB 1000 as a California Environmental Justice Alliance member.¹ As a result, moving forward we hope to work closely on the creation of the final Environmental Justice Element with the City.

The following recommendations highlight specific goals, programs, and policies the City should include in its Environmental Justice Element, based on the information gathered in the Technical Report and on CBE’s continued engagement with its members who live, work, and recreate in Huntington Park. Moreover, many of these recommendations draw from the California Office of Planning and Research’s Healthy and Environmentally Just Communities document, which highlights existing environmental justice goals, policies, and programs that have been adopted by municipalities across California.²

Pollution Exposure & Air Quality

- As the technical report correctly notes, residents in Huntington Park live with high levels of ozone, PM_{2.5}, and diesel particulate matter from high truck traffic in and around the City. CBE recommends the City adopt a policy in its Environmental

¹ California Environmental Justice Alliance is a statewide coalition of environmental justice advocates, <https://caleja.org/> (last visited July 1, 2022). CBE is a founding member of this coalition. CEJA is also a co-sponsor of SB 1000 (Leyva 2016).

² Cal. Office of Planning and Research, Healthy and Environmentally Just Communities, https://opr.ca.gov/docs/20181120-Draft_for_public_review_example_GPG_Policy_Language.pdf (last visited June 28, 2022).

Justice Element to limit diesel truck idling near sensitive receptors within certain times and designate truck routes that limit truck traffic near residential neighborhoods and other sensitive land uses.

- Figure 5 of the Technical Report highlights the clear disparity in pollution burden between residents living in the peripheries of the planning area—especially near the City of Vernon—and those living near the center of the planning area. As such, CBE recommends the City adopt a policy, similar to [Los Angeles County’s Green Zones Ordinance](#),³ creating air pollution buffers by zoning residences, schools, childcare facilities, elderly care facilities, parks, and health care facilities away from heavy industrial areas. The City should prohibit development of any of these sensitive uses in census tracts with a pollution burden above 80%, including tracts 6037532500, 6037532700, 6037533002, 6037533201, and 6037533501.
- The Technical Report found that the highest percentile of cleanup sites are located along the boundaries of the City’s planning area and that relatively disadvantaged communities have the highest cleanup site percentiles scores in Huntington Park. Therefore, CBE recommends that the City adopt a policy or program to remediate brownfield sites, based on residents’ input. The City’s remediation efforts should provide access to health-promoting goods and services, economic development, expansion of open spaces and parks, community gardens, cooling centers, and other similar community uses. The City should also adopt a policy to safeguard against housing development on brownfield sites without proper remediation and state oversight.
- Although the Technical Report finds that Huntington Park residents experience significantly elevated soil lead levels, it fails to mention the Exide battery-recycling facility as one of the main known sources of lead pollution in the area. The City must disclose this information and develop programs and policies tailored to this source of pollution. Strategies designed to remediate this source of lead pollution necessarily differ from those designed to address lead-based paint and lead-contaminated dust in older buildings. Consequently, CBE urges the City to create a working group with the California Department of Toxic Substances Control, community organizations, and interested residents with the goal of supporting outreach to residents regarding the ongoing cleanup and expediate the residential cleanup process in the City.
- CBE disagrees with the Technical Report’s conclusion that the City’s water supply is not significantly contaminated, relative to the rest of the state. Residents spend a significant portion of their incomes buying bottled water because they are unable to drink the brown-colored, murky tap water that comes out of their faucets. In fact, the [Environmental Working Group’s Tap Water Database](#)⁴ reports that there are a total of 29 contaminants found in the water serviced by the Huntington Park Water Department. Although the water meets federal drinking water standards, this does

³ L.A. County Dept. of Regional Planning, Public Hearing on the Green Zones Program, https://planning.lacounty.gov/assets/upl/project/greenzones_board-letter.pdf (last visited June 28, 2022).

⁴ Environmental Working Group, Huntington Park Water Department, <https://www.ewg.org/tapwater/system.php?pws=CA1910049> (last visited June 28, 2022).

not mean that the water meets the latest health protective guidelines. EPA has not updated many of these standards in almost 20 years. As such, CBE recommends that the City work with the Huntington Park Water Department and other municipal water providers that service residents in Huntington Park to ensure high quality drinking water for residents. The City should also adopt a policy to support the preparation of water quality and water management studies to ensure the continued provision of good quality water to residents.

Public Facilities

- The Technical Report correctly highlights the severe lack of parks in the City. The Draft Environmental Justice Element should include a policy encouraging the construction of new parks and open spaces near community facilities such as schools, senior centers, and recreational centers. The City should also expand public transportation routes to better service existing recreational facilities and site new parks in close proximity to homes. The City should also require that development of parks, trails, and open spaces occur concurrently with other area development.
- To increase the availability of open space to the extent possible, the City should adopt a policy that encourages joint-use agreements with school districts allowing the public to use recreational facilities on school property during non-school hours and, where feasible, coordinate with public entities granting easements to be used as parks and trails.
- To ameliorate the lack of bike lane infrastructure, the City should also prioritize the construction of protected bike lanes and implement street design features that facilitate walking and biking. The City should also adopt a Bicycle Master Plan to enhance bicycle circulation and planning.
- Given the high number of pedestrians and truck traffic in the City, CBE recommends that the draft Environmental Justice Element address pedestrian safety. The City should consider adopting a policy to create continuous, safe, and attractive pedestrian environment by improving street lighting, maintenance, and signage.
- The Technical Report failed to study the lack of health services located in the City. Given the high rates of cardiovascular and respiratory illnesses discussed in the Physical Activity section of the Technical Report, the City should ensure health clinics and hospitals are located throughout the City and are accessible via public transit. CBE recommends the City adopt a policy to ensure equitable distribution of health clinics, emergency services, dental care, and mental/behavioral health services. The City should also support access to improve health and social services for seniors, unhoused people, and young children and their families. Furthermore, the City should adopt policies to support the elimination of barrier for individuals with permanent and temporary disabilities and individuals with limited or no English proficiency to access healthcare and health resources.

Food Access

- The Technical Report’s correctly found that residents in Huntington Park experience more than double the rate of food insecurity compared to residents in Los Angeles County and the State. As such, the City should adopt policies to increase the diversity of locally produced foods offered at local grocery stores to give residents greater access to a healthy, nutritionally adequate diet.
- Many communities in the city are classified as low-income and have impaired access to the nearest supermarket or grocery store. Therefore, CBE recommends that the City adopt a policy to expand access to farmers’ markets that accept WIC and SNAP payments with expanded hours, in transit-accessible locations, and on public property with minimal cost to vendors.
- Furthermore, the City should encourage the production and accessibility of fresh produce by expanding community gardens and allowing small-scale urban agriculture in parks, schools, and neighborhoods. The City should also adopt policies that encourage and support the use of public lands for community gardens.

Safe and Sanitary Homes

- Access to safe and sanitary homes is deeply connected to residents’ ability to remain in their homes. Housing shapes people’s sense of community and connects them to the resources that sustain their lives. Without adequate housing protections, vulnerable renters will experience housing instability due to rising housing costs, gentrification, discrimination, and inadequately-maintained housing. To develop tenant protection measures that address the cost burdens experienced by renters in the City, CBE recommends that the City implement the goals, programs, and policies recommended in the [California Environmental Justice Alliance’s Environmental and Housing Justice Platform](#).⁵ In particular, CBE recommends the City strengthen its rent control policies beyond the statewide rent stabilization law, expand just cause provisions to cover all rental units, lower allowable rent increases, and close other loopholes.
- New development in the City related to construction of transit-oriented districts and the West Santa Ana Branch should prioritize the affordability needs of area residents. The City should adopt policies prioritizing the production of affordable housing and create anti-displacement zones to ensure existing residents remain in their communities.
- Climate change has disproportionate impacts on low-income, underserved communities. The City’s Environmental Justice Element must commit to investing in climate-resilient infrastructure for its residents. As such, CBE recommends adopting policies placing covenants on properties that receive public grants, requiring property owners to maintain affordable rents and pair building retrofit

⁵ Cal. Env’tl. Justice All., Environmental and Housing Justice Platform, https://calgreenzones.org/wp-content/uploads/2021/10/CEJA_GZ-EHJP-Full-Platform-Final.pdf (last visited June 28, 2022).

funds with affordable housing acquisition funds to convert distressed or vacant properties into climate-resilient housing.

- As the Technical Report correctly notes, the City experiences high rates of housing overcrowding. Overcrowding contributes to negative health outcomes, [including higher infection rates of COVID-19](#).⁶ As such, the City should adopt policies to reduce overcrowding in homes by increasing access to deeply affordable housing and subsidized housing options.
- As the City's housing stock continues to age, the City should ensure landlords maintain rental units in a safe, sanitary, and habitable condition. CBE recommends that the City adopt policies that provide timely and adequate responses to habitability complaints, regardless of whether tenants are current on rent or whether property owners have been responsive to the complaint. In addition, the City should adopt policies to ensure code enforcement actions do not result in retaliatory displacement of tenants, especially for undocumented tenants and other vulnerable populations.

Physical Activity

- The Technical Report correctly points to the high rates of asthma, obesity, and cardiovascular disease in the City and the ways in which historical land use patterns, inadequate access to open space, nutritious food, and multimodal transportation contribute to health disparities in the City. As such, the City's Draft Environmental Justice Element should include programs and policies that support the development of compact, transit-adaptive, and pedestrian and bicycle-friendly development patterns, and increase opportunities for active transportation and transit use.

Civic or Community Engagement

- CBE recommends the City adopt policies that encourage public participation by providing simultaneous Spanish translation services and listening devices for all meetings, using a variety of venues throughout the community, using participatory facilitation techniques, and using culturally appropriate approaches to public participation and involvement. The City should also consider adopting policies to hold meetings and workshops at times and locations that are accessible and convenient to community members. In particular, the City should adopt additional policies to engage with residents that may be directly affected by a particular decision.
- The City must engage with residents of all ages, but also specifically including people with disabilities and as well as seniors. Outreach must be done through multiple avenues of public outreach. Further, the City should adopt policies to build and strengthen residents' capacity to participate in local planning, governmental affairs, and policy decision-making.

⁶ Ben Poston, Tony Barboza, Ryan Menezes, *Southeast L.A. already faced many ills. Now it's the epicenter of coronavirus.*, L.A. Times (Aug. 6, 2020), <https://www.latimes.com/california/story/2020-08-06/newest-covid-19-cases-surge-in-southeast-la-county>.

- Finally, following the adoption of the Environmental Justice Element, the City should continue to hold regular community workshops and meet with neighborhood-specific citizen committees to solicit feedback on the City's planning activities.

Conclusion

CBE appreciates the opportunity to recommend goals, programs, and policies for the City's upcoming draft Environmental Justice Element. State law requires the development of specific and targeted goals, programs, and policies that allow residents to measure the benefits of the Environmental Justice Element. CBE looks forward to reviewing the draft Environmental Justice Element upon its release.

Sincerely,

Idalmis Vaquero
Jennifer Ganata
Attorneys for Communities for a Better Environment

CC: Erick H. Serrano and Kimiko Lizardi, Rincon Consultants
Mari Mayeda, Deputy Attorney General, Environmental Justice Bureau
Valerie Feldman and Melissa Morris, Public Interest Law Project
Navneet Grewal and Lucia Choi, Disability Rights California