

## CALIFORNIA COASTAL COMMISSION

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# Resources for Addressing Environmental Justice through Local Coastal Programs



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# Overview

In its Environmental Justice Policy (EJ Policy), the Coastal Commission (Commission) committed to “strongly encourage local governments to amend their local coastal programs (LCPs), port master plans, public works plans, and long-range development plans to address environmental justice issues.” The Commission also directed staff to develop best practices to help local governments develop policies that reduce impacts on environmental justice communities<sup>1</sup> from new development. The resources in this document are intended to advance both objectives.

This document is the product of input, research, analysis, training, successes, and lessons learned to date through the development and ongoing implementation of the Commission’s EJ Policy. The following includes:

- 1) Background on the historical context of environmental justice;
- 2) How changes in the Coastal Act and adoption of the Commission’s EJ Policy intersect with LCPs;
- 3) Examples and best practices on priority topic areas, such as ways to integrate environmental justice into LCPs, meaningful engagement with environmental justice communities, and equitable coastal access.

Whether environmental justice community members live at the coast or visit for work or recreation, they have a stake in the coast’s future and a meaningful voice regarding the potential impacts from proposed development on their communities. The information, examples, and best practices contained in this document are intended to help state and local partners bolster their meaningful engagement with and reduce development impacts on environmental justice communities.

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<sup>1</sup> The term “environmental justice community” in this document refers to low-income communities, communities of color, and other populations with higher exposure and/or sensitivity to adverse environmental impacts due to historical marginalization, discriminatory land use practices, and/or less capacity to mitigate adverse impacts. The term is used interchangeably with “under-resourced communities,” “affected communities” or “communities of concern,” in this document.

# 1. Introduction: Why Consider Environmental Justice?

## 1.1 The Case for Environmental Justice

At its core, the California Coastal Act of 1976 (Public Resources Code, Division 20, Section 3000, et seq) is a statute inherently grounded in the principle of equity. Yet, despite numerous victories, the statute's vision of coastal protection and access for all people has not been fully realized. The long-term legacy of institutional racism in land use planning continues to be reflected in the demographic and socioeconomic makeup of the California coast today. While many overtly racist laws have been overturned, generations of injustices towards California's Native American communities, people of color, and other historically marginalized populations have resulted in an inequitable distribution of environmental benefits and burdens that still disproportionately impact these communities today.

For example, discriminatory housing practices like past redlining and restrictive covenants in home deeds have hindered individuals identifying as Black, Latino, Asian, or other non-white races or ethnicities from acquiring coastal property and building the same inherited, intergenerational wealth enjoyed by white families. Federal, state and even local government policies played key roles in reinforcing which groups were viewed as citizens with full rights. These ranged from interning Japanese American citizens who lost their farms and homes in the process, to preventing Black residents from enjoying or living near some of California's best beaches, to dispossessing thousands of Black and Latino families of their homes to build the vast freeway systems throughout California and sports arenas in Los Angeles and the Bay Area.

Land use decisions are only one part of a much larger system that has led to the systemic marginalization of many people across the country. Because government played a key part in creating these historic harms, government can and must help to unwind them. Shifting institutional focus to intentionally identifying and addressing systemic and structural inequalities will not only increase equity, but will also enhance the resilience, diversity, and quality of life for entire communities across California.

The concept of environmental justice emerged out of the Civil Rights Movement to describe the application of civil rights and social justice in environmental contexts. For decades, activists and leaders have continued to press government institutions for equal protection from environmental harms related to land use decisions, culminating in the drafting and adoption of [The Principles of Environmental Justice](#) by the First National People of Color Environmental Leadership Summit in 1991 in DC. In 1994, President Bill Clinton signed [Executive Order 12898](#) establishing statutory support for advancing environmental justice and directing federal agencies to develop environmental justice strategies. Shortly after, states such as California began enacting legislation to advance the concepts of environmental justice. These new laws

sought to correct long-standing inequalities that have disproportionately burdened lower-income communities and communities of color, or denied equal access to the social, economic, and public health benefits associated with environmental protection and access to natural resources.

In 2016, the passage of Assembly Bill (AB) 2616 ([Burke](#)) to amend the Coastal Act represented another step to ensure agencies prioritize environmental justice, racial and social equity in the context of coastal land use decisions.

Proactive planning can provide decision makers and the public with a framework for talking about and addressing these issues up front, which can significantly reduce conflicts later in the process. Given this, the Commission strongly encourages local governments to consider developing their own environmental justice policies and amending their LCPs accordingly.

### Box 1.1 State and Federal Definitions of Environmental Justice

Environmental justice is defined in both state and federal policies and laws.

According to the **U.S. Environmental Protection Agency**, environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

According to **California Government Code 65040.12(e)** and **Public Resources Code Section 30107.3**,

- (1) “Environmental justice” means the fair treatment and meaningful engagement of people of all races, cultures, incomes, and national origins with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.
- (2) “Environmental justice” includes, but is not limited to, all of the following:
  - (A) The availability of a healthy environment for all people.
  - (B) The deterrence, reduction, and elimination of pollution burdens for populations and communities experiencing the adverse effects of that pollution, so that the effects of the pollution are not disproportionately borne by those populations and communities.
  - (C) Governmental entities engaging and providing technical assistance to populations and communities most impacted by pollution to promote their meaningful participation in all phases of the environmental and land use decision making process.
  - (D) At a minimum, the meaningful consideration of recommendations from populations and communities most impacted by pollution into environmental and land use decisions.



## 1.2 Why Include Environmental Justice Policies in Local Coastal Programs?

Historically, most cities and counties have not formally acknowledged environmental justice in their analyses of proposed development in the coastal zone or formulated local policies to address it through their land use planning documents.

In 2016, Governor Brown signed AB 2616, enabling the Commission and local governments to consider environmental justice in permits and appeals by adding several new provisions to the Coastal Act. The bill cross-referenced existing civil rights and environmental justice laws in the Coastal Act (Public Resources Code (PRC) Section 30013), added the existing state definition of “environmental justice” in PRC Section 30107.3, and required the governor to appoint one environmental justice commissioner. The bill also authorized the Commission and local governments to consider environmental justice in coastal development permit (CDP) decisions (PRC Section 30604(h)).

**30604(h)** *When acting on a coastal development permit, the issuing agency, or the commission on appeal, may consider environmental justice, or the equitable distribution of environmental benefits throughout the state.*

By referring to “the issuing agency,” the Legislature’s intention was that both the Commission and local governments would use this new authority and consider environmental justice when making planning decisions. The Commission interprets this to mean that environmental justice need not be considered for each and every permit action, but rather, that it should be considered in circumstances where environmental justice issues are relevant. This interpretation avoids an unwieldy mandate for environmental justice findings to accompany every decision, but instead focuses on whether the proposal raises an environmental justice issue or not.

To provide guidance and clarity for commissioners, staff, and the public on how the agency would apply this new authority, the Commission adopted its [Environmental Justice Policy](#) in 2019. It sets out how the agency will implement and integrate the principles of environmental justice, equality, and social equity into all aspects of the Commission’s program and operations. The EJ Policy was the culmination of a two-year effort developed with input from more than 100 environmental justice groups, California Native American Tribes, conservation organizations, and individuals. A team of staff conducted multiple public webinars, several meetings and calls with environmental justice groups and partners, and public presentations at multiple coastal locations.

The EJ Policy includes an opening statement, an implementation plan, and a set of principles to guide staff and commissioners in their decisions. It discusses a range of issues, including: the importance of respecting tribal concerns,<sup>2</sup> conducting meaningful engagement with environmental justice communities, coastal access for all, the role of local governments, affordable housing, equitable public participation at meetings, accountability and transparency of government, and evaluating and addressing the disproportionate environmental and public health burdens these communities experience from climate change and the degradation of habitat and natural resources. Importantly, both the law and the EJ Policy require that environmental justice concerns be addressed in a manner that is also consistent with the Coastal Act.

### Box. 1.2 Tribal Consultation

In 2018, the Commission adopted its [Tribal Consultation Policy](#), recognizing the sovereign status of tribes and their right to government-to-government consultation. The EJ Policy identifies the importance of tribal concerns and injustices experienced by tribes. The EJ Policy does not replace the requirement for government-to-government consultation with tribes. Similarly, local governments should consider tribal consultation in their LCP updates and coastal development projects.

Since adopting the EJ Policy, the Commission has been evaluating project proposals for potential impacts that may disproportionately harm under-resourced and overburdened communities or exacerbate the long-standing inequities previously overlooked in Coastal Act analyses. By proactively considering potential impacts, the Commission has been able to identify and address environmental justice concerns associated with new development through the addition of environmental justice findings in staff reports as appropriate, working with applicants to modify project proposals, outreach, and engagement with environmental justice partners, and adding specific conditions to CDPs.

PRC Section 30604(h) speaks directly to the issuance of CDPs. While the Commission implements the Coastal Act directly, it proactively decided to build a policy foundation for its actions through its EJ Policy, rather than ad-hoc on a permit-by-permit basis. Similarly, local governments in the coastal zone should strongly consider adopting LCP policies to guide and inform the analysis of environmental justice impacts as part of their regulatory review, as opposed to the shifting standards of individual applications or hearing about issues for the first time as part of the public hearing process. Adopting policies and standardized protocols will save time and resources for planning departments, applicants, and the public, while providing

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<sup>2</sup> In 2018, the Commission adopted its Tribal Consultation Policy. The EJ Policy identifies the importance of tribal concerns and injustices experienced by tribes but does not replace the requirement for government-to-government consultation with tribes.

transparency about expectations that can build trust with environmental justice communities over time.

Building awareness of and implementing environmental justice principles, proactively engaging, and including environmental justice communities in decision making and thinking about ways to modify current approaches to land use planning and environmental analysis are all necessary to achieve environmental justice.

Taking these steps requires institutions to challenge the status quo, which can be uncomfortable but crucial, if government is to shift its role from perpetuating systemic inequities to addressing them and building a more just and equitable society. The Commission and local jurisdictions have an opportunity to act on these issues by updating LCPs with policies to address environmental justice principles and concerns.



## 2. Integrating Environmental Justice into Local Coastal Programs

Local government partners in coastal cities and counties play an important role in protecting the California coast. Local governments are required to develop local coastal programs (LCPs), which carry out policies of the Coastal Act at the local level and must be approved by the Commission. Once a community has an approved LCP, the local government can issue most coastal development permits (CDPs), although many of these local decisions can be appealed to the Commission. The Commission must also approve any amendments to the LCPs. Thus, LCPs are an avenue for addressing and evaluating environmental justice through planning and developing standards. As stated in its EJ Policy, the Commission “will strongly encourage local governments to amend their LCPs, port master plans, public works plans, and long-range development plans to address environmental justice issues.” This section provides information on how to consider environmental justice during an amendment or creation of a new LCP.

An LCP amendment includes any kind of amendment or update, including comprehensive updates. If a local government does not have an existing LCP, then they would have to create a new LCP. The process to amend or create a new LCP includes initial project scoping, working with consultants, drafting the full update or amendment, seeking final adoption from the local government, and finally, certification by the Commission. Creating or amending an LCP is a significant process that allows the community to be involved in planning for future development and creating policies and provisions for land use decisions in a community. Ongoing relationships between the local jurisdiction and environmental justice communities established early on will help inform the scope of the new LCP or amendment, understand environmental justice concerns, and identify policy considerations for the LCP.

Addressing environmental justice in the coastal zone should reflect the intent of PRC Section 30604(h) and incorporate input from environmental justice communities affected by coastal development in the local jurisdiction. Integrating environmental justice into LCPs may be done in a variety of ways, as described below. **The Commission encourages the following steps when considering how to integrate environmental justice into LCPs:**

1. Identify concerns in partnership with environmental justice communities.
2. Determine the scope of the new LCP or amendment.
3. Include policies to address environmental justice concerns in the coastal zone.

The following section concludes with example policy topics to consider in LCPs based on the Commission’s EJ Policy. While this document focuses on LCPs, some of the information in this section may also apply to other planning documents, such as long-range development plans and port master plans.

## 2.1 Identify Concerns in Partnership with Environmental Justice Communities

Prior to developing any new policies and planning documents, it is important to establish partnerships with environmental justice community members and work with them to identify and understand their concerns regarding coastal development in the local jurisdiction. Working directly with environmental justice partners throughout the LCP scoping and amendment process will ground the foundation of the policy development in authentic experiences. Without adequate and meaningful engagement, environmental justice policies will lack credibility with the affected community that can result in adverse outcomes later in the process. Within each jurisdiction, there will be opportunities to create nuanced policies that reflect the local context and priorities of environmental justice communities.

There are several ways to identify affected communities, learn about their concerns, and build relationships with them. In some cases, there are additional laws that require jurisdictions to identify environmental justice communities using specific definitions, such as SB 535, SB 1000, and AB 1550, which statutorily define disadvantaged communities and low-income areas and communities.<sup>3</sup> Regardless of the approach taken, the Commission encourages all jurisdictions to consider the following and incorporate as appropriate into their new or existing LCP amendment documents:

- **Work with environmental justice communities to understand who they are and how they have been affected by coastal land management** – Direct contact and communication with community members and partners are important to understand their lived experiences and can provide a wealth of information. For example, speaking with environmental justice community-based organizations, local workers, or visitors can illuminate their relationship with a coastal area even though they may not live there. Information from these communities or other affected populations, including unsheltered populations or undocumented immigrants, can provide unique insight about a community that may not be obvious from quantitative data. Thus, it is essential to speak directly with environmental justice community members and partners. The

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<sup>3</sup>[SB 535](#) (De Leon) added Section 39711 of the Health and Safety Code directing the California Environmental Protection Agency (CalEPA) to identify disadvantaged communities based on geographic, socioeconomic, public health, and environmental hazard criteria, which CalEPA currently designates using CalEnviroScreen and lands under control of federally recognized Tribes (see [CalEPA website](#) for more information). [SB 1000](#) (Leyva) defines “disadvantaged communities” as an area identified pursuant to Section 39711 as well, but also considers “low-income area,” defining it as “an area with household incomes at or below 80% of the statewide median income or with household incomes at or below the threshold designated as low income by the Department of Housing and Community Development’s list of state income limits adopted pursuant to Section 50093.” [AB 1550](#) (Gomez) defines “Low-income communities” as census tracts with median household incomes at or below 80 percent of the statewide median income or with median household incomes at or below the threshold designated as low income by the Department of Housing and Community Development’s list of state income limits adopted pursuant to Section 50093.

process should be iterative and occur as an ongoing conversation with the community before, during, and after the LCP amendment process. Building trusting relationships between government and environmental justice partners may take repeated efforts because there may be lingering mistrust among communities that have been marginalized by government and face greater barriers to participation. It is important to work towards overcoming this mistrust because developing strong relationships with environmental justice communities and working towards eliminating procedural barriers are necessary components of a just and equitable decision-making process.

- **Understand environmental justice communities' histories and relationships with the jurisdiction's coastal zone** – In order to achieve environmental justice, it is important to understand the past and present injustices that exist and the relationships that environmental justice communities have with the coast. For example, understanding past harms, such as the history of families of color being prevented from buying homes because of redlining or learning about health issues faced from living near oil refineries, ports, and other industries, can inform changes in land use and development practices. Asking communities about their relationship to the coast provides an understanding of how people experience environmental benefits or burdens along the coast. Do their families visit the coast to fish? Do they come to the coast for work or recreation? If they live along the coast, what health and environmental issues are relevant in their area and important to them?
- **Don't just ask for input. Use it.** – Input from communities should be integrated into planning documents. Be transparent about how any feedback or input from meetings will be used and, if possible, share drafts for review to ensure comments are being used accurately and to increase transparency with the community. Community expertise can be used as the baseline for establishing guidelines for policies.

To recap, addressing environmental justice in the jurisdiction's coastal zone requires identifying concerns of environmental justice communities that live, work, or recreate in the jurisdiction, developing meaningful relationships with them, and engaging with them in the LCP amendment process. The information gleaned from this step will inform how to identify environmental justice issues in partnership with affected communities. For more information on working with communities and best practices for meaningful engagement, see Section 3.

## 2.2 Determine the Scope of the New LCP or Amendment

Local governments may choose to integrate environmental justice into their LCPs via several approaches. For example, environmental justice policies could be added through a focused LCP amendment, during the next comprehensive update for an existing LCP, or while creating a new comprehensive LCP if the jurisdiction does not have an LCP. Policies may be integrated

throughout the LCP in several chapters, in a standalone environmental justice chapter, or both in a separate section and integrated throughout the document. The Commission also encourages local governments to align LCP amendments with other planning and policy updates to integrate environmental justice into decision making at the local level. For example, during any general plan updates to add a new environmental justice element or set of policies to meet the requirements of SB 1000<sup>4</sup>, Commission staff can also work with local governments to integrate these policies into the LCP as well. Additional information about LCPs and best practices for LCP amendments can be found on the [Commission's webpage](#).

## 2.3 Include Policies to Address Environmental Justice Concerns in the Coastal Zone

Gathering information about local environmental justice concerns can help to develop background information and policies on environmental justice issues in a local government's LCP. As a result, each LCP may have different policies that are tailored to address environmental justice concerns specific to its part of the coastal zone. **The Commission recommends that all LCPs include a policy similar to PRC Section 30604(h) to ensure environmental justice is considered during the review of CDPs**, both in the analysis of project outcomes and during the decision-making process. For example, the City of Half Moon Bay included several Land Use Plan (LUP) policies on environmental justice in its updated LUP certified by the Commission in 2021. The City recognized workforce housing for low-to-middle income families and equitable coastal access as critical issues relating to environmental justice and social equity. As a result, the City included policies on broad consideration of environmental justice, a special affordable workforce housing overlay policy, and evaluating coastal access with regards to equitable access.

Additionally, several other pieces of information will support the consideration of environmental justice through LCPs. The Commission recommends local governments incorporate the following information into their LCPs:

- **Definitions in the background section and terminology** – There are several ways to define environmental justice and communities experiencing disproportionate environmental burdens and/or receiving fewer environmental benefits. LCPs can include definitions from the Government Code as well as from local sources.
- **Background on environmental justice concerns related to coastal development in the jurisdiction and affected communities**, which includes, but is not limited to:

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<sup>4</sup> Senate Bill 1000 (Leyva) was signed into law in 2016 and requires environmental justice to be addressed in local government planning for a city, county, or city and county if the jurisdiction has a disadvantaged community as defined by the law. See [bill text](#) for more information.

- History of communities that have experienced or continue to experience discrimination and other forms of marginalization.
  - Demographic and socioeconomic characteristics of residents, workers and visitors to the coastal zone (this can include both quantitative and qualitative information); if there is projection data, include demographic projections as well.
  - Existing and future risk of environmental burdens in environmental justice communities identified either through CalEnviroScreen or a similar tool that identifies cumulative impacts in the coastal zone that affect environmental justice communities
- **Goals and policies on environmental justice.** See next section for example topics and issues that may be considered.
    - General policy on coastal development, similar to PRC Section 30604(h).
    - General policies on meaningful engagement, including ones addressing language access, meeting accessibility, and transparency with communities.
    - Relationship to other LCP policies, such as coastal access, hazard and pollution mitigation and avoidance, affordable housing, lower-cost accommodations, etc.
- **Summary of community engagement and involvement efforts with environmental justice communities** before and during the LCP amendment process.

## 2.4 Local Coastal Program Policy Concepts Addressing Environmental Justice

LCPs are land use planning documents that are certified by the Commission to implement the Coastal Act within a given local coastal jurisdiction. As a result, these documents implement the Chapter 3 policies of the Coastal Act that protect coastal resources, support priority land uses, ensure siting and development design that minimizes risk in areas of coastal hazards, and address land use planning issues significant to the coastal zone and the goals of the Coastal Act. To implement its EJ Policy and PRC Section 30604(h), the Commission considers environmental justice with respect to all of these coastal resource issues. To help start the process and ensure that coastal land management is carried out to reduce burdens and increase benefits for environmental justice communities, this section provides a list of policy concept options that may be considered for inclusion in LCP amendments or a new LCP and tailored to a local government’s needs and concerns. The policy concepts below are presented as considerations, not requirements, and do not represent a comprehensive list of all topics. As mentioned throughout this resource guide, environmental justice concerns associated with coastal land management should be identified and developed in consultation with affected community members.

## Policy Concepts for Consideration in LCPs

Certified LCPs with environmental justice policies:

- [City of Half Moon Bay LUP \(2021\)](#)
- [San Diego's Barrio Logan Balanced Plan \(2023\)](#)

### Environmental Justice

- Address environmental justice when acting on a coastal development permit.
- Avoid cumulative environmental impacts on environmental justice communities; mitigate impacts when avoidance is not possible.

### Meaningful Engagement and Public Participation

- Provide accessible and transparent decision-making processes that facilitate public engagement of diverse partners throughout the jurisdiction, including visitors and workers, with targeted engagement of disproportionately impacted communities who may lack resources or face additional barriers, such as language and transportation, when accessing decision making processes.
- Engage early and often with environmental justice communities affected by coastal development in the jurisdiction; provide regular updates on upcoming projects and explain how community input will inform development decisions.
- Develop a language access policy and measures to provide access to information about coastal development processes and actions for limited English proficient individuals affected by coastal development, such as translation of vital documents and interpretation at public meetings.

### Public Access

- Maximize public access with special attention to environmental justice communities within the LCP jurisdiction, as well as visitors from environmental justice communities outside the jurisdiction.
- Reduce impediments to public use by reducing or eliminating time restrictions on access (e.g., 1 hour before dawn to 1 hour after dusk), reducing the cost of beach use (e.g., parking fees), and removing intimidation measures (e.g., no access signs, automated license plate readers in public right of way).
- Remove psychological barriers to access, such as guard gates, imposing signage, beach-patrolling private security guards, and encourage prominent directional signage to public areas and self-parking payment methods in multiple languages.
- Ensure beach access points are located within reasonable proximity to environmental justice communities and that they are accessible via multiple modes of transportation (e.g., public transit, bikes); require 'complete streets' planning in transportation projects.
- Ensure amenities at coastal access sites are equitably accessible to all visitors (e.g., ADA accessible, public restrooms, picnic areas, trails, playgrounds).



- Require signage with text in English to also include translations in other locally spoken languages, such as Spanish; consider use of QR Codes or other app-based measures that explain public access rules or limitations in other visitor languages.

### Visitor-Serving Uses

- Reserve areas for and encourage free or lower-cost visitor-serving uses (e.g., picnic grounds or gathering areas, beach equipment rental, concessions, natural and scenic resource viewing, visitor centers, visitor tours).
- Protect and provide free public access to piers and other areas for subsistence fishing.
- Require no-net-loss of lower-cost accommodations, such as the conversion of low-cost to high-cost facilities; in the case of unavoidable loss, require mitigation for loss of affordable accommodations through off-site facilities, in-lieu fees, and/or other community benefits.<sup>5</sup>
- Provide a range of accommodation types that will accommodate a range of income levels; ensure such overnight accommodation prioritizes low-cost alternatives.
- Ensure temporary events do not impede public access, use of coastal recreational areas or parking by the public. E.g., prohibit, or severely limit, temporary removal of areas free to the public and replacing them with fee-based events; where allowed, require mitigation such as free entrance to under-resourced target groups or alternative access or activities provided to under-resourced community groups.

### Transportation and Coastal Parking

- Encourage multimodal, affordable transportation, including public transportation, vehicles, pedestrians, and bicycles through and around a community to support a diversity of transportation options.
- Include employer-based requirements to provide free or low-cost parking, public transportation stipend.
- Ensure availability of alternative forms of payment for parking that do not require a bank account.
- Consider incentives for conjunctive parking programs with appropriate partners to increase public parking supply during peak seasons and/or events.

### Coastal Hazards and Climate Change

- Foster resiliency and adaptation to climate change in the coastal zone, protect environmental justice communities from additional cumulative impacts, and integrate resiliency measures into planning, operations, and infrastructure projects.

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<sup>5</sup>According to the [U.S. Department of Energy](#), community benefits agreements are legal contracts between a developer and the impacted community and/or its representatives (governmental and non-governmental). These strategic agreements are mutually beneficial, as governments need support from their constituencies, developers need government for permit approvals, and community interests can be funded or furnished by the developer for their support of a project. Benefits can include commitments to hire directly from a community, contributions to economic trust funds, local workforce training guarantees, mitigation of increased pollution exposure, and more.

- Analyze and address costs of sea level rise adaptation on environmental justice communities, including displacement and exposure to environmental hazards and contaminants.
- Prioritize the cleanup or relocation of existing hazardous facilities and avoid siting new hazardous facilities in flood-prone areas.

#### Public Health

- Ensure water quality and use, air quality, soil health, and other coastal resource impacts from development meet environmental health standards and do not disproportionately burden environmental justice communities.
- Prioritize projects providing equitable benefits from habitat protection, such as clean water and ecosystem services, for environmental justice communities.

#### Industrial Development

- Require best available technology in industrial development to minimize environmental impacts and to protect nearby communities and resources.
- Site and design industrial development to avoid adverse impacts in environmental justice communities; mitigate if adverse impacts are unavoidable.
- Assess meaningful alternatives beyond mitigation measures to re-siting projects with negative environmental health impacts in environmental justice communities to minimize or avoid adverse impacts to those communities; if viable alternatives are available, consider those in permitting decisions.
- Incorporate measures during design, construction, and for the life of any development in contaminated industrial sites to remediate any soil and water contamination such that any future development will be safe for human health and residential uses at the site.

#### Public Works

- Site major public works facilities, including transportation projects, to avoid adverse impacts in environmental justice communities.
- Ensure that throughout their lifespan, these facilities will not increase burdens on overburdened communities (e.g., air pollution, water quality, utility rates).

#### Affordable Housing

- Provide affordable housing in accordance with the general plan Housing Element in the case that housing is displaced in the coastal zone due to coastal hazards or coastal development.
- Encourage affordable housing development in allowable land use designations to be safe from coastal hazards and to have equitable access to coastal environmental benefits.

## Box 2.1 We Hear You: Listening to and Integrating Community Feedback in Policies

When the Commission started developing its EJ Policy to guide implementation of its authority under AB 2616, the approach used was similar to how staff prepared other draft reports for the Commission to consider. Staff researched and released the Commission's first public draft policy in February 2017 with the intent of soliciting public comment and amending the proposal accordingly. However, the Commission and staff soon learned from partners that doing so without first engaging with the environmental justice community was not the best approach -- so staff withdrew the first draft policy from the Commission agenda and went back to the drawing board to develop a new engagement plan and create a policy grounded in community input. Staff formed a statewide team of district liaisons and spent a year contacting and listening to environmental justice groups and community partners in each region of the coast about what environmental justice meant to them and how the Commission can do more. During the policy development and adoption process, staff contacted more than 100 partners through conference calls, environmental justice roundtables, community meetings, and presentations with student groups and university classes. To improve communication and access to information about the Commission, staff created an environmental justice email listserv to provide direct updates with interested individuals and new informational materials including an environmental justice web page, a story map, instructional handouts, and a dedicated email account:

[EnvironmentalJustice@coastal.ca.gov](mailto:EnvironmentalJustice@coastal.ca.gov).

Over a year later, the Commission released a new draft EJ Policy for public review in August 2018 with guiding principles, such as coastal access, tribal concerns, meaningful engagement, and climate change, that were based on direct input from partners. Staff hosted two additional public comment periods and webinars, and released subsequent copies of the draft policy that explicitly highlighted how input was added to the revised drafts through footnotes and a detailed response to each public comment received to explain how their input was addressed in the policy. For individuals and community partners with significant comments and concerns, staff set up individual meetings to understand their perspective and address any comments directly.

As a result, when the Commission adopted its EJ Policy in 2019, it had broad support from environmental justice partners across the state and adopted a policy grounded in environmental justice community and public input, which continues to inform the Commission's implementation of its environmental justice authority. The Commission seeks to apply its policy on a case-by-case basis so that it provides the broadest protection possible for members of environmental justice communities throughout the state who may be disproportionately affected by coastal development while still considering local conditions.

## 3. Meaningful Engagement

### 3.1 Introduction

The term “environmental justice” is understood to include both **substantive** and **procedural** rights, meaning that in addition to the equitable distribution of environmental benefits, environmental justice communities also deserve equitable access to the process where significant environmental and land use decisions are made.<sup>6</sup> Meaningful engagement is the foundation upon which all subsequent policy and decision making depends. Because environmental justice communities have historically been underrepresented in, or even purposefully excluded from, land use planning and permitting decisions, it is critical for local governments to incorporate meaningful engagement policies and actions into their LCPs and permit reviews. Documenting the efforts to reverse these trends will help institutionalize equitable implementation of development policies and permitting processes, and eventually contribute to better protection of natural resources and lands for all communities. This is an opportunity for government to address injustices, at least within coastal land management, that many environmental justice communities experience today.

Environmental justice communities can experience both intentional and unintentional procedural barriers that make it difficult to engage in the decision-making process. In many instances, impacted communities say they receive little to no notice regarding a planned project or the passage of a zoning change or change in law and are seldom made aware of the full range of potential adverse impacts that may result from these changes. Environmental justice communities also face greater burdens when trying to participate in the public process. They are rarely consulted or adequately included from the beginning of the planning process even when it directly impacts their communities. See Box 3.1 for examples of how communities were affected when excluded from important environmental decision-making processes.

This section provides best practices in conducting meaningful engagement and examines two jurisdictions, County of Ventura and City of Santa Cruz, which have begun to incorporate meaningful engagement with environmental justice communities into their LCP amendment process.

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<sup>6</sup> California Coastal Commission Environmental Justice Policy, adopted 2019.

### Box 3.1 When Meaningful Engagement is Absent

In many instances, environmental justice communities say they receive little to no notice regarding a planned project or the passage of a zoning change or change in law and are seldom made aware of the full range of potential adverse impacts that may result from these changes. For example, residents of East Oakland, California, which is predominately an under-resourced community of color, said they were never informed that the City had in 2012 approved the development of a crematorium capable of incinerating 3,000 bodies a year.<sup>1</sup> While the City, which did not hold a hearing on the permit, claimed the crematorium was a “light industrial activity” and the emitted pollutants would do no serious harm, opponents said the crematorium would add pollution and mercury from melted tooth fillings into the already polluted air surrounding the east Oakland neighborhood. The City’s decision to issue the permit without community engagement sparked outrage and distrust in the government process, along with a flurry of lawsuits.

Environmental justice communities also face greater burdens when trying to participate in the public process. They are rarely consulted or adequately included from the beginning of the planning process even when it directly impacts their community. An early example of this is the 1982 decision by the State of North Carolina to construct a toxic waste facility in a predominantly Black neighborhood in Warren County. The State conducted no outreach to the surrounding community regarding the proposed project. However, Warren County residents still learned about the project. The State moved ahead with the development despite weeks of protest and a collective outcry of the potential health hazards associated with the project.<sup>2</sup> This event and community protest is considered as one of the first examples of the environmental justice movement across the country.

<sup>1</sup> <https://www.sfgate.com/bayarea/article/Burning-controversy-over-East-Oakland-crematorium-4867741.php>

<sup>2</sup> <https://www.theguardian.com/environment/2019/mar/08/climate-changed-racism-environment-south>

## 3.2 Policy Context

Both state and federal law integrate meaningful engagement into the definition of “environmental justice.” According to the United States Environmental Protection Agency (U.S. EPA), meaningful engagement means that 1) potentially affected community members have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment or health; 2) the public’s contribution can influence an agency’s decision; 3) the concerns of all participants involved will be considered in the decision-making process; and 4) the decisionmakers seek out and facilitate the involvement of those potentially affected.<sup>7</sup> In

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<sup>7</sup> [Environmental Justice-Related Terms as Defined Across the PSC Agencies](#)

the California Government Code, the definition of environmental justice was amended in 2020 to incorporate “meaningful engagement.”<sup>8</sup>

Coastal Act Section 30107.3 includes, in its definition of environmental justice, the “meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies,” as well as, “meaningful consideration of recommendations from populations and communities most impacted by pollution into environmental and land use decisions.” The Commission also acknowledges the importance of meaningful engagement in its adopted [EJ Policy](#):

*The Commission acknowledges the critical need to communicate consistently, clearly, and appropriately with environmental justice groups and underserved communities. Because of their historic under-representation in coastal land use planning and permitting decisions, it is important to make additional efforts to inform these communities about projects with environmental justice findings implications for their neighborhoods and families. Commission staff will work to obtain and dedicate meaningful resources to reach out early and often to these communities, in language that is understandable and accessible to local communities that face limited English proficiency, lack access to formal education, and experience other obstacles to engagement. They will also augment outreach with non-traditional communication methods, for example, the use of social media, flyers, community meetings, town halls, surveys, language translation services and focus groups targeted at populations who face barriers to participation. To ensure that specific outreach efforts are effective, staff will ask community groups and organizations for their suggestions and preferences for adjusting these techniques for any given matter.*

In addition to environmental justice communities, the Commission recognizes that California Native American Tribes have also experienced segregation, discrimination, and exclusion from land use decisions and development processes. In response, the Commission developed a [Tribal Consultation Policy](#) that addresses specific approaches and policies to conducting meaningful engagement with tribes. Local governments should note that engagement with both federally recognized and unrecognized tribes is important to understand the significance of local and regional cultural concerns. While this memo focuses on meaningful engagement with environmental justice communities, specialized engagement with tribes should also be conducted and should follow the appropriate consultation process discussed in the Commission’s related policy.

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<sup>8</sup> Amended Assembly Bill 2816 (Rivas), 2019 to include [meaningful engagement](#) and [meaningful involvement](#) in the State’s definition of environmental justice.



### 3.3 Best Practices

Understanding how to conduct meaningful engagement through an environmental justice lens requires a shift in how government entities incorporate public participation. The community engagement spectrum (Figure 1), which was developed by community-based organizations Facilitating Power, and Movement Strategy Center, and the National Association of Climate Resilience Planners, is an example of how communities, community-based organizations, and local leaders can facilitate better collaboration.<sup>9</sup> The spectrum can help local entities recognize their current level of engagement, set goals for where they want to improve their meaningful engagement with environmental justice communities, and identify steps that will ultimately improve local conditions and strengthen community relationships.

Stance towards community	0 IGNORE	1 INFORM	2 CONSULT	3 INVOLVE	4 COLLABORATE	5 DEFER TO
Impact	<i>Marginalization</i>	<i>Placation</i>	<i>Tokenization</i>	<i>Voice</i>	<i>Delegated Power</i>	<i>Community Ownership</i>
Community Engagement Goals	Deny access to decision-making processes	Provide the community with relevant information	Gather input from the community	Ensure community needs and assets are integrated into process and inform planning	Ensure community capacity to play a leadership role in implementation of decisions	Foster democratic participation and equity by placing full decision-making in the hands of the community; bridge divide between community and governance
Message to Community	<i>"Your voice, needs, and interests do not matter"</i>	<i>"We will keep you informed"</i>	<i>"We care what you think"</i>	<i>"You are making us think (and therefore act) differently about the issue"</i>	<i>"Your leadership and expertise are critical to how we address the issue"</i>	<i>"It's time to unlock collective power and capacity for transformative solutions"</i>
Activities	Closed-Door Meetings Misinformation Systematic Disenfranchisement Voter Suppression	Fact Sheets Open Houses Presentations Billboards Videos	Public Comment Focus Groups Community Forums Surveys	Community Organizing & Advocacy House Meetings Interactive Workshops Polling Community Forums	MOUs with Community-Based Organizations Community Organizing Citizen Advisory Committees Open Planning Forums with Citizen Polling	Community-Driven Planning Consensus Building Participatory Action Research Participatory Budgeting Cooperatives
Resource Allocation Ratios	100% systems admin	70-90% to systems admin 10-30% to promotions and publicity	60-80% to systems admin 20-40% to consultation activities	50-60% to systems admin 40-50% to community involvement	20-50% to systems admin 50-70% to community partners	80-100% to community partners and community-driven processes that ideally generate new value and resources that can be invested in solutions

<sup>9</sup> [From Community Engagement to Ownership Tools for the Field with Case Studies of Four Municipal Community-Driven Environmental & Racial Equity Committees](#) created by Facilitating Power, the Movement Strategy Center, the National Association of Climate Resilience Planners.

**Figure 1.** Community engagement spectrum by Facilitating Power, Movement Strategy Center, and the National Association of Climate Resilience Planners. There are various versions of this engagement spectrum. The overall purpose of the engagement spectrum is to demonstrate how government entities can improve their meaningful engagement strategies to help strengthen their relationship with environmental justice communities.

Figure 2 outlines sample steps that a local government can take to increase community engagement before, during, and after certification of a new LCP or amendment to an existing LCP by the Commission. Additionally, whenever possible, the Commission encourages local governments to align their other various planning documents and zoning codes. Incorporating meaningful engagement practices and policies into an LCP, like the requirements of SB 1000 that require some local governments to integrate environmental justice policies into general plans, will create a more cohesive planning vision across City- and County-wide processes.<sup>10</sup>



**Figure 2.** Meaningful Engagement Flow Chart. This flowchart summarizes key steps and initiatives local governments should consider and address during the entire LCP certification process, from initial project scoping to final LCP adoption.

<sup>10</sup> The State of California has adopted several laws and policies to incorporate environmental justice into decision making processes, including Senate Bill 1000 (SB 1000), the [Planning for Healthy Communities Act](#). SB 1000 helps government agencies better integrate environmental justice principles into the planning process. Specifically, SB 1000 requires cities and counties to include an environmental justice element in their general plan, including “identifying objectives and policies to promote civic engagement in the public decision-making process.” For more information on the bill and best practices from environmental justice partners, see [SB 1000 Implementation Toolkit](#).

### 3.3.1 Meaningful Engagement Before Creating New LCPs and Amendments

The LCP amendment process, which refers to the entire process from initial project scoping, working with consultants, drafting the amendment, to final adoption by the local government and certification by the Commission, is a significant step that will improve development and land use decisions in a community. A similar process is followed when a local government creates a new LCP if they did not have one before. Even before a local government decides to undertake the development of a new LCP or LCP amendment, they should work to build the foundations of their meaningful outreach process and establish a commitment to work with environmental justice communities. These early actions will relieve a significant amount of work for local governments by improving trust and communications about proposals with the public and helping local governments identify concerns early on to be addressed through the process rather than becoming an issue later. Some of the early actions that local governments can take include identifying environmental justice communities in and around their jurisdiction, researching the cultural and racial history in their community, conducting general surveys to understand the needs and burdens of environmental justice communities, and partnering with community-based organizations. These actions are further described below:

- **Identifying environmental justice communities** in and around the jurisdiction is a core step in the outreach and engagement process. There are several resources available that can aid in this step, including **quantitative** information from resources such as the State's [CalEnviroScreen](#) tool, U.S. EPA's [EJSCREEN](#), California Climate Investment's [AB 1550 Low Income Communities data](#), U.S. Census data, **and qualitative** information from meetings with community members and organizations and social and local news media.

Local governments should be cognizant that members of environmental justice communities affected by development in their coastal zone jurisdiction may live outside of a city or county boundary and outside of the coastal zone, but they may travel into or through their jurisdiction for work or to visit coastal resources and recreational opportunities.

- **Delving into the local history of environmental justice communities** will help agencies understand how development patterns and policies may have led to the burdens that under-resourced communities face today, including housing, access to open spaces, and coastal recreation. Meaningful engagement with environmental justice communities does not need to be related to a specific project or planning update; rather, local governments can begin to build connections by working to understand the historic challenges facing these communities.
- **Conducting community surveys** among environmental justice communities can help local governments understand the priorities and problems that their communities currently face regarding land use and development. The survey can be conducted in partnership with community-based organizations. The greater burdens and barriers that

environmental justice communities contend with may shape different priorities and concerns regarding climate change, coastal access, public recreation, and resource protection compared to wealthier communities. Differences in income, work benefits, job schedules, health disparities, healthcare affordability, and transportation modes can also create disparities between under-resourced neighborhoods and wealthier parts of a community. Thus, conducting a survey that is not tied to a specific LCP amendment will help a local government gather baseline information and inform that jurisdiction's LCP planning priorities.

- **Connecting and partnering with community-based organizations** working in or with environmental justice communities is a key step that will help local governments build a meaningful engagement process. Community organizations can include local nonprofits, faith-based organizations, school associations, and clubs. A major way government staff can begin building trust with these organizations is by attending existing community meetings and getting to know organization leaders and members. Establishing a relationship with these trusted groups can help a local government to engage a broader audience, dismantle some distrust that communities may have with government entities, and identify a more unified vision of community needs that can be incorporated into an LCP. And while such partnerships may help local governments connect with environmental justice communities, these partnerships should be equally meaningful and beneficial to the community organizations. These groups may have limited capacity, and local governments should consider how they can support the community organization's work or priorities. For example, such support can include stipends for community participation, providing food and childcare during existing or new meetings, and staffing door-to-door canvassing opportunities and other community events. Table 1, adapted from the Institute for Local Government, identifies some common issues that community organizations experience when trying to partner with local governments, as well as practices to avoid these pitfalls.<sup>11</sup>

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<sup>11</sup> [Partnering with Community-Based Organizations for More Broad-Based Public Engagement](#) by Institute for Local Government

**Table 1.** Dos and Don'ts of Engagement with Community Organizations.

Do	Don't
Establish two-way communications where both local governments and community organizations can aid from a mutual and equal partnership.	Use the organization as a “supplier” for access to communication with environmental justice communities.
Establish a shared understanding of what can be expected from both the local government and the community organization.	Have unrealistic demands or expectations of community organizations, including unrealistic time and resource expectations.
Partner with community organizations to develop specific materials and questions that are geared towards the needs and interests of the communities the organization works with. If local governments need broader input, consider partnering with multiple organizations that work with different communities.	Create vague surveys and scoping questions that are a “one size fits all” for community organizations to distribute among their various networks.
Create an explicit set of responsibilities and tasks between the local government and the community organization.	Assume that community organizations or local governments know what each group is responsible for.
Clearly explain decisions and outcomes made by the local government throughout the entire LCP amendment process.	Create a process wherein organizations and the communities they work with feel used, unheard, or left in the dark.

**Table 1.** *Dos and Don'ts of Engagement with Community Organizations.* This table presents ways in which local governments can avoid common issues that community organizations often experience when they partner with local government.

### 3.3.2 Meaningful Engagement During New LCP and Amendment Processes

#### Evaluating Engagement Efforts

Local governments can improve engagement efforts by setting measures to track and evaluate progress at the beginning of the process to create new or amend existing LCPs. Documenting efforts can also be helpful to share with environmental justice partners to help increase trust and transparency in the process. While each local government might take different approaches to meaningful engagement, generally, they should evaluate whether their engagement efforts achieve the following goals:

- Environmental justice communities and the public receive information early, clearly, and continuously throughout the process to create a new or amend an existing LCP.

- Individuals of different backgrounds and/or abilities have equitable access to information because informational materials are ADA-compliant, account for language barriers, are culturally appropriate, and include meeting times and locations.
- Environmental justice communities receive responses from local government and their feedback is incorporated into the process to create a new or amend an existing LCP.

The goals listed above are a simplified breakdown of engagement outcomes which local governments are encouraged to achieve. Each engagement effort should relate to a goal, include a number of targets to help reach that goal, as well as indicators to measure the effectiveness of each action.<sup>12</sup> Additionally, local governments can use the engagement spectrum in Figure 1 to aid in developing ways to track progress on engagement efforts.

### Participation Barriers

When a local government is considering a new LCP or amendment, it helps to identify the many unique barriers that environmental justice communities may encounter during the public participation process. These barriers can include language, meeting times, childcare, transportation access, and technology access. For example, a public meeting that takes place on a weekday morning, is located far away from the affected community, and/or has costly parking and limited access to public transportation or free parking will make it difficult for some residents to attend. Individuals may need to take a day off work, arrange for childcare, and figure out how to get to the site if they do not have a car. These barriers create disproportionate burdens on community members who have less financial flexibility, may be transit-dependent, do not understand English very well, and have limited access to technology.

- **Language barriers** – Individuals who do not speak or understand English well may not be able to access information about the new LCP or amendment if materials are only provided in English. Local governments should consider written translation of their materials in at least one or two languages predominantly spoken among their residents including surveys, flyers, notices, and website announcements. If possible, agencies should also provide oral interpretation services or accommodate public speakers who would like to speak in a language other than English at public meetings by allowing them to bring a translator. Adopting policies in an LCP can also promote better access to government services, programs, and meetings for those with limited English proficiency. Some local governments have committed to providing government services in more than one language for individuals who do not speak English by adopting language access policies.<sup>13</sup>
- **Meeting times** – Several factors affect a person’s ability to participate in meetings held during the daytime or on a weeknight. For example, individuals in jobs that are shift-

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<sup>12</sup> Adapted from the San Francisco Public Utilities Commission’s Equitable Engagement Guidelines

<sup>13</sup> [City of Long Beach Language Access Policy](#)



based, hourly-wage, and/or without paid time off policies may be unable to take a day off to attend meetings conducted during the daytime. For some, it can be a matter of weighing whether to attend a meeting or pay their rent. To account for this, local governments can consider making public comment on an item time certain, such as the first item of the meeting. If meeting times are unchangeable for agencies, they should consider other ways in which environmental justice communities can participate, such as opportunities for pre-recorded public comments via live video stream or phone calls.

- **Childcare** – Lack of access to childcare services can influence a guardian’s ability to attend public meetings. Ways to address this barrier can include notifying the public of meeting dates well ahead of time so individuals may make arrangements or providing onsite childcare services during meetings. For example, local governments could partner with a community organization to help provide childcare services or consider holding the meeting at a site where children can go during the meeting, such as a recreation center.
- **Transportation access** – Environmental justice communities may lack access to public meeting sites. For example, individuals may not have access to a car, public transportation schedules or routes may not be available near environmental justice communities or meeting locations, and other rideshare options may be too costly. Agencies can alleviate this issue by holding meetings near public transportation services, within walking distance from where people live, or providing other methods for participation that do not require individuals to physically attend meetings.
- **Meeting location** – Sometimes, the mistrust and fear of government processes may make it harder for individuals to want to attend or participate in public meetings. Local governments can address this concern by holding some meetings in locations or areas that are more familiar or trusted by the community. Community partners may provide information on potential locations sites or existing meetings that are frequented and trusted in their communities.
- **Meals** – In some cases, community members may face socio-economic barriers that make it difficult for them to access food or the meeting may be held during, or last through meal times. If possible, consider providing food at the meeting, so all participants can have equal access to sustenance during the discussion, encouraging participation and attendance.

### Virtual Engagement Best Practices

The COVID-19 global pandemic led many local governments to hold virtual or hybrid (virtual and in-person) public meetings and hearings. While allowing individuals to participate in public meetings virtually will alleviate many physical access barriers for environmental justice communities, agencies should also consider existing access to technology. Some individuals may lack access to unlimited cellular data, home computers or smartphones, internet, and

email. The list below contains general best practices when conducting a meeting with a virtual component.

- Early outreach is crucial because it allows individuals time to locate the necessary equipment, prepare and submit written comments, or learn how to use technology and online applications that they may not be familiar with.
- Agencies can consider providing or partnering with local community hubs, such as libraries, schools, and community centers, to provide free or low-cost technology equipment where individuals can watch or participate in a meeting virtually.
- Information regarding how to access a meeting, provide comments, or participate in a virtual meeting should be provided in simple language and multiple languages and distributed in person and online.

### 3.3.3 Meaningful Engagement Following Certification of New LCPs and Amendments

Continued engagement with environmental justice communities will maintain a level of ongoing trust even after the adoption of an LCP. Continued engagement can help increase trust and partnership between both entities and potentially streamline future outreach regarding specific projects or additional updates. Examples of ongoing outreach practices include periodic calls or emails and participation in neighborhood workshops and events to provide updates and an outlet for continuous feedback. Such feedback evaluations can be used as a resource for staff to learn what communication methods work for particular groups and what can be adjusted.

### 3.4 Institutionalizing Meaningful Engagement through LCP Policies

Public Resources Code Section 30503 states that all members of the public shall be provided maximum opportunities to participate in the LCP amendment process, which further underscores the importance of engaging with environmental justice communities. By approaching the LCP amendment process in a collaborative way that invites all members of the public to contribute, LCPs can help ensure protection of coastal resources and an equitable and just California coast for all. Section 2.4 includes policy concepts on meaningful engagement that local governments may incorporate in new LCPs and amendments to ensure that these practices continue after the LCPs have been certified by the Commission and become embedded in future coastal development decisions. Though not mandatory, the policy concepts in Section 2.4 are meant to serve as a tool and example for local governments as they undertake the new LCPs and amendments and consider ways to institutionalize meaningful engagement for all coastal development applications.

## 3.4. Case Studies

### 3.4.1 Local Coastal Program Grant Requirements

The Commission helps to support meaningful engagement efforts through the LCP Local Assistance Grant Program. Since 2013, the Commission has awarded almost \$21 million in grant funding (approximately 90 separate projects) to local governments seeking to develop or update their LCPs. One of the key requirements for grantees is to incorporate meaningful engagement and outreach components into the LCP amendment process. Two rounds of grant funds (totaling \$2 million) were provided by the California Climate Investment (CCI) Program, which includes [guidelines](#) indicating that a percentage of funding must benefit projects in environmental justice communities. The Commission also updated its [funding priorities](#) in 2018 (with subsequent updates in [2021](#)) to prioritize planning work to address projects that maximize public benefits for environmental justice communities. Before grant agreements are approved, they are reviewed for consistency with the Commission's funding priorities, which include engagement and outreach components. Additionally, each contract includes standardized language on meaningful engagement with environmental justice communities:

*Public outreach shall target all interested members of the public, including visitors and other non-residents to the maximum extent feasible for the purpose of meaningful engagement in policy development, technical studies, and other tasks conducted pursuant to the grant Project. All public outreach activities related to the Project shall, to the maximum extent feasible, proactively engage those who already face disproportionate environmental burdens or vulnerabilities to environmental hazards, and/or those who come from communities of existing social inequalities, including members of the public and organizations from the following communities: disadvantaged communities, communities of color and/or low income, communities with low capacity to adapt to climate change, and communities not in close proximity to the shoreline but who visit and recreate there. Outreach activities shall seek to provide maximum opportunities for these groups to engage with and provide input on the tasks of the Project.*

### 3.4.2 City of Santa Cruz

The City of Santa Cruz completed a targeted amendment to their LCP that incorporated policies and changes addressing sea level rise and coastal hazards. Notably, the City built in meaningful engagement as a core assignment in the LCP amendment process, as opposed to an add on task, and allocated a significant portion of their budget toward this outreach. As detailed in its [Synthesis Summary of Outreach and Engagement](#), the City conducted an iterative engagement process. The Engagement Plan laid out a detailed process that included a variety of outreach events and methods including focus groups, one-on-one interviews, multiple surveys, partnerships with community organizations, Technical Advisory Committee (TAC) workshops, and open houses, as well as follow-up and feedback surveys after outreach events. With the onset of the COVID-19 pandemic, the City increased outreach efforts to reach people who were

uncomfortable or unable to use technology. These efforts were intended to gather information on peoples' use of, concerns for, and interest in coastal areas of Santa Cruz. Outreach also consisted of knowledge building activities for the City's residents on coastal issues and resources. The information that was gathered was analyzed and folded into decisions and next steps, which gave way to an extensive synthesis of adaptation pathways for specific beaches and coastal areas within the City. Among their meaningful engagement efforts, the City included a specific focus on socially vulnerable populations and underrepresented groups. City staff recognized that outreach with these groups is vital because they may face more challenges preparing for, safely evacuating, and recovering from coastal hazard events.



The City partnered with community organizations and other groups that work closely with the underrepresented populations to understand their unique needs and uses of the coast and how adaptation strategies may impact these groups' needs. In total, the City held meetings with nine groups and organizations that represented socially vulnerable populations, including those who are ages 65 and older, those who speak English as a second language, those who are low-income, those with a disability, and those who live in areas with high crime rates (violent and property crime). In addition to these focus group meetings, City staff partnered with San Jose State University instructors and graduate students to assist with 125 one-on-one interviews with those who are a part of socially vulnerable and underrepresented groups to further identify their unique needs and uses of the City's coastal areas. The outcomes of these meetings and interviews were fully incorporated into the City's development of adaptation strategy priorities.

### 3.4.3 County of Ventura

As of 2023, the County of Ventura has been conducting a targeted amendment to their LCP to incorporate policies and changes that address sea level rise and coastal hazards. In 2020, the County received grant funds from the Commission to complete this LCP amendment, referred to as the "VC Resilient Coastal Adaptation Project, Phase II." After the County completed Phase I of the project, they identified the need to conduct a comprehensive public outreach campaign to educate residents on the adverse impacts of sea level rise, encourage public participation in the LCP update process, and gather feedback from residents on their current uses and concerns for the County's coastal resources.

In the County's outreach plan that was submitted to Commission staff, they proposed a variety of engagement efforts including updating the County webpage, distributing an informational flyer, conducting a community survey, meeting with local organizations, and hosting several community events. The webpage update includes sea level rise information presented more

simply and translated in the five languages spoken among Ventura County residents, including English, Spanish, Vietnamese, Korean, and Chinese. The informational flyer was distributed among as many residents as possible, particularly within the most vulnerable populations that include seniors, renters, and Spanish-speaking residents. In addition to electronic distribution, the County identified local places frequented by these vulnerable populations to distribute in-person flyers, including at stores, affordable housing events, and community food distribution centers. Lastly, the survey was provided online as well as mailed to census tracts located in rural agricultural areas that were identified as “disadvantaged” using CalEnviroScreen, Social Vulnerability Index and U.S. Census data to identify areas with high pollution burdens and population vulnerability.

As for meeting with local organizations, County planning staff identified a number of potential groups that serve low income and disadvantaged communities to conduct outreach. The County discussed sea level rise vulnerabilities respective to each organization’s area of expertise and presented the contents of the informational flyer, with the goal of creating a partnership with these organizations. Additionally, the County has separately prioritized and conducted outreach with Native American tribes in accordance with State Tribal Consultation Guidelines. Beyond these partnerships, once a revised draft of the LCP that contains updated sea level rise and climate action policies is complete, the County aims to participate in community meetings and other outreach events conducted by other agencies or local organizations who work with disadvantaged communities. For these events, the County plans to take measures that will help minimize the barriers to participation for disadvantaged communities. These measures include sending event information at least one week in advance, asking the host agency to provide multiple formats for providing comments prior to, during, and after the meetings, and asking the host agency to provide Spanish interpretation during the meetings. As the County moves forward with its LCP update work, they continue to look for additional opportunities to engage with local communities.

## 4. Equitable Coastal Access

Addressing environmental justice in the context of coastal access and recreation means analyzing the equitable distribution of coastal access and recreation opportunities and addressing barriers experienced by environmental justice communities. This document discusses several aspects of how environmental justice intersects with public access and recreation, including barriers to coastal access and ways to increase equitable access and recreation through LCP policies and implementation.

### 4.1 Barriers to Coastal Access and Recreation

Throughout California’s history, low-income communities, communities of color, California Native American Tribes and other populations with historically marginalized identities have experienced greater burdens and barriers in accessing the California coastline. For example, for much of the 20<sup>th</sup> century, residents of color were only allowed at certain beaches such as the

#### Box 4.1 The Commission’s Statement of Environmental Justice Principle on Coastal Access

Article X of the California Constitution guarantees the right of access to navigable waters for all people. The Commission also recognizes that equitable coastal access is encompassed in and protected by the public access policies in Chapter 3 of the Coastal Act. The Coastal Act’s mandates to provide maximum access and recreational opportunities for all, and to protect, encourage, and provide lower-cost visitor and recreational opportunities embody fundamental principles of environmental justice. In its EJ Policy Statement, the Commission reaffirms its long-standing commitment to identifying and eliminating barriers, including those that unlawfully privatize public spaces, in order to provide for those who may be otherwise deterred from going to the beach or coastal zone. The coast belongs to everyone, and access cannot be denied or diminished on the basis of race, ethnicity, income socioeconomic status, or place of residence or other factors listed in the EJ Policy Statement.

Understanding that even nominal costs can be barriers to access, preserving and providing for lower-cost recreational facilities is also an environmental justice imperative. This includes recreational opportunities such as parks, trails, surf spots, beach barbecue and fire pits, safe swimming beaches, fishing piers, campgrounds, and associated free or low-cost parking areas. The conversion of lower-cost visitor-serving facilities to high-cost facilities is also a barrier to access for those with limited income and contributes to increased coastal inequality. The Commission will strive for a no-net-loss of lower-cost facilities in the coastal zone, while implementing a longer-term strategy to increase the number and variety of new lower-cost opportunities.

Where a local government fails to consider environmental justice when evaluating a proposed development that has the potential to adversely or disproportionately affect a historically disadvantaged group’s ability to reach and enjoy the coast, that failure may be the basis for an appeal to the Commission. Similarly, where a LCP includes policies that implement environmental justice principles, a local government’s failure to consider those principles may also be the basis of an appeal to the Commission.

Inkwell in Santa Monica and Bruce's Beach in Manhattan Beach.<sup>14</sup> In Los Angeles, the Jonathan Club, a beachfront social club on public land, maintained an exclusively wealthy, white male membership that excluded non-Christians, people of color and women until it was forcibly integrated through Commission action in the 1980s. An individual's race, national origin, income level, gender, sexual orientation, or place of residence must not affect how someone experiences the benefits of the California coast. Developing effective policy solutions to address inequitable coastal access requires understanding the types of barriers experienced by environmental justice communities and why these barriers exist.

#### 4.1.1 Geographic Barriers

A legacy of historic actions continues to impact those who live along the coast. Research using 2010 Census Bureau data on coastal access equity in California found that while a majority of Californians, 79.7%, live within 62 miles of the coast, populations closest to the coast are disproportionately white, affluent, and older than those who live farther inland.<sup>15</sup> These patterns grew out of a long history of institutionalized practices, such as discriminatory lending practices, exclusionary zoning, and restrictive covenants, that prevented people of color from purchasing and renting property in what were considered the more desirable neighborhoods.<sup>16</sup> For example, in the 1930s the federal government and lenders began outlining "risky" neighborhoods, which were mostly Black inner-city neighborhoods or communities of color, in red ink on maps as a warning to mortgage lenders. This prevented Black and other non-white families from purchasing property and enjoying the kind of inherited wealth from which white families have benefited. In many cases, home deeds included racist covenants that restricted the sale or rental of the property to certain racial or ethnic groups. Even after the Community Reinvestment Act was passed in 1977 to help prevent redlining, critics say the discrimination continued. Many communities implemented exclusionary zoning policies, such as single-family housing, which preserved land use patterns established by discriminatory practices, and continued to limit new families from moving into an area due to a lack of housing.<sup>17</sup>

These barriers historically prevented people of color from purchasing coastal property in the most desirable areas, and even today there are measures that continue to hinder certain communities from visiting the coast. These include public transportation routes and services, parking amenities and limited lower-cost overnight accommodations. The loss of free or low-

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<sup>14</sup> Robert Garcia & Erica Flores Baltodano, *Free the Beach! Public Access, Equal Justice, and the California Coast*, Stanford Journal of Civil Rights and Civil Liberties. 143 (2005)

<sup>15</sup> Reineman, et al., *Coastal Access Equity and the Implementation of the California Coastal Act*, Stanford Environmental Law Review Journal, v. 36. Pages 96-98 (2016)

<sup>16</sup> Robert Garcia & Erica Flores Baltodano, *Free the Beach! Public Access, Equal Justice, and the California Coast*, Stanford Journal of Civil Rights and Civil Liberties. 143 (2005)

<sup>17</sup> Additional information on the impact of exclusionary housing practices and policies on affordable housing and demographic patterns in the coastal zone can be found in a 2022 Commission staff report on the historic roots of housing inequity: <https://documents.coastal.ca.gov/reports/2022/6/TH6d/Th6d-6-2022-report.pdf>



cost parking can disproportionately burden low-income individuals who may not be able to afford higher fees or who will have to park farther away at lower-cost sites. Changes in coastal neighborhoods' parking zones from free to residential permitted parking or only one hour parking can have a similar impact with increased parking demand for limited spaces. Similarly, conversion of overnight lower-cost accommodations to luxury or market rate rooms along the coast further reduces opportunities for coastal access for individuals from environmental justice communities. Cumulatively, these subtle changes can contribute to beach access becoming a privilege only available to those able to afford to pay higher fees or able to afford a home within walking distance of the coast. It is incumbent on the Commission and coastal local governments, who steward these beach resources for all Californians and not just local residents, to consider the larger implications of coastal access policies.

Industrial land uses along the coast can be another barrier to access for environmental justice communities in the coastal zone. In some instances, there are environmental justice communities in close geographic proximity to the coast who cannot get to the coast because their coastline is industrialized with little to no public access. These industrial land uses can include ports, energy facilities that require ocean water for cooling, and brownfields from the decommissioning or demilitarization of former industrial land. Communities near these land uses are also often burdened with additional negative environmental impacts, such as air pollution.

These geographic patterns continue to be perpetuated by ongoing disinvestment in these communities and lack of access to infrastructure, housing, amenities, and other factors that could reduce or eliminate these barriers. To the extent local governments have jurisdiction over aspects of this type of development, the regulatory process is an opportunity to provide much-needed access through design review or permit conditions.

#### 4.1.2 Physical Barriers

In California, Article X of the constitution guarantees the right of access to navigable waters for all people, and equitable coastal access is encompassed in and protected by the public access policies in Chapter 3 of the Coastal Act. However, physical barriers can both intentionally and unintentionally prevent people from accessing navigable waters, beach and coastal recreation opportunities. While these barriers can affect anyone, often, there is a disproportionate impact on people of color and low-income individuals who are already separated from the coast as the result of geographic barriers.

The privatization of public beach space, whether temporary or permanent, creates physical barriers by reducing available public beach space. For example, temporary events, such as music festivals and sports tournaments, can take up public beach space (especially near public parking) for private use. Other more permanent forms of privatization, such as landscaping and patios that encroach on public beach space, also create physical barriers. Local governments and the Commission can take action to protect public access affected by these barriers.

Coastal armoring structures such as seawalls and revetments can also create physical barriers to access, including eliminating beach and shoreline recreation areas where they are placed and preventing beaches, wetlands, and other habitats from migrating inland with sea level rise, causing them to narrow and eventually disappear (often referred to as “coastal squeeze”). In some instances, there might be alternative public access opportunities on these structures, such as walkways or fishing sites, but these features do not replace the beach that may be lost as a result of the seawall. While coastal armoring may contribute some temporary protection for property, this protection of a structure comes at the expense of the broader public. Those who cannot afford to live near the coast will be disproportionately burdened by the loss of the beach, access to amenities and low-cost recreation.

#### 4.1.3 Socioeconomic and Demographic Barriers

Access to the California coast should not be influenced by an individual’s demographic or socioeconomic characteristics. Yet certain characteristics, such as income, race, physical ability, gender, sexual orientation, language spoken at home, and national origin, do change someone’s experience. Based on input from environmental justice partners on the Commission’s EJ Policy and during meetings regarding specific projects before the Commission affecting environmental justice communities, barriers that someone may experience differently based on their socioeconomic and/or demographic characteristics were identified:

- **Cost barriers** – One of the benefits of coastal protection under the Coastal Act is the protection and maximization of coastal access and free or low-cost recreation along the coast. Despite this mandate and the Commission’s efforts to provide for public access and lower-cost amenities, lower-income families with less discretionary spending money face several cost barriers, including parking fees and limited supply of affordable overnight accommodations. Increases in parking rates disproportionately burden lower-income families, particularly when no alternate free parking or mode of transportation to the beach exists. Public transportation, which may be more affordable, has limited routes going to coastal public access sites and recreation areas, and if available, may be time-restricted since many have less frequent service on weekends and holidays. Temporary events, such as cost-prohibitive ticketed concerts or sporting events, privatize public space for benefits that cannot be equitably experienced by all.

Additionally, groups serving low-income communities, such as small non-profits bringing youth from environmental justice communities to the coast, may have restricted options due to limited numbers of permits, availability of facilities, or use fees, which burden non-profit groups greater than for-profit entities. The limited supply of low-cost accommodations exacerbates coastal access inequalities by socioeconomic status and disproportionately hinders the ability of individuals from low-income communities to stay overnight on the coast. A State Coastal Conservancy-commissioned survey in 2017 identified that “low and middle-income households, people of color, and

young people are less likely than higher-income, white, or older Californians to stay overnight at the California coast,” and cited “financial reasons” as the most common barrier to coastal access.

- **Language barriers** – According to 2016-2020 American Community Survey Data, 43.9% of California’s population speaks a language other than English at home, and among them 39.7% identified as speaking English “less than very well” or are considered “limited English proficient.”<sup>18</sup> The most spoken language other than English in California is Spanish, but depending on the region, several Asian or Indo-European languages might also be commonly spoken, including Vietnamese, Tagalog, Chinese, and Russian. Despite the diversity of languages in California, much, if not most, information for the public is often only available in English. For example, signage at coastal access points, such as ones that provide information about safety procedures, rules, fees, and parking are often only in English. Public and private entities often conduct outreach about public recreation preferences, such as surveys, in one language. As a result, an entire segment of California’s population does not have meaningful access to information about or the ability to participate in important planning and project design decisions that affect coastal resources.

Since the adoption of its EJ Policy, the Commission has started regularly adding special conditions requiring translation of signs, outreach and engagement materials and informational materials about parking passes and rules. Usually, requirements are for translating materials to Spanish and other commonly spoken languages in the area. In some instances, local governments have a local language access policy, which informs Commission recommendations. Knowing the languages spoken locally and their prevalence is essential for informing outreach strategies as well as needed translation services.

- **Cultural preferences for recreation** – There are several ways to enjoy public spaces, such as walking, having picnics, hiking, fishing, or organizing a community gathering. Many of these activities are enjoyed by people of all backgrounds. However, this is not the case for all uses and activities. For example, some recreation activities, such as surfing and swimming, have less representation and diversity of people from different races, backgrounds and national origins because many of these communities do not have access to facilities or resources where they can learn these skills. Without targeted public engagement and input from communities who already experience barriers to

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<sup>18</sup> The American Community Survey measured language spoken at home by asking persons to report whether they sometimes or always spoke a language other than English at home. People who knew languages other than English but did not use them at home, who only used them elsewhere, or whose usage was limited to a few expressions or slang were excluded.

participating in the decision-making process on what they would like in public spaces or amenities, the benefits of public access and recreation opportunities may not be realized equitably. Input from environmental justice communities will provide insight into how public access and recreation opportunities can be incorporated into the planning and design rather than the end of the process.

Since adopting its EJ Policy, the Commission has started to require conditions asking applicants to conduct culturally relevant and targeted engagement in communities of color, non-English speaking communities, and low-income communities to inform public access plans and programming. This provides another opportunity for public agencies to ensure that different needs are met.

- **Informal barriers** – Consistent with the public access policies of the Coastal Act, local governments should consider the adoption of LCP policies to identify and eliminate barriers to access to provide for those who may be otherwise deterred from going to the beach or coastal zone. This includes formal barriers, such as walls, gates, and preferential parking programs, or excessive surveillance, which can have direct impacts on specific populations, and informal barriers that might not be in place to intentionally prevent people from accessing the coast, but still may restrict access because of psychological impacts, such as instilling fear and anxiety for certain populations. For example, when reviewing the Oceano Dunes State Vehicular Recreation Area CDP, the Commission heard from members of the public that some of the vehicles that drive through their community to gain access to the park display flags and symbols that made them feel unwelcome or unsafe.

The Commission acknowledged this observation, not in an effort to limit free speech, but to recognize that certain symbolic displays, such as Confederate flags or sexualized images of women or automatic weapons on flags, can have as much of a chilling and exclusionary effect on public access as “No Trespassing” or “Private Property” signs. Such symbols that have represented historical oppression and violence can be informal barriers to access because they can alienate certain groups of the public and prevent them from enjoying equal access to the coast. Automated license plate readers in public rights of way near coastal access sites are another example of an informal barrier that may deter some people from visiting the coast due to a loss of privacy. Local governments may wish to explore ways to ensure that every member of the public knows they are welcome in coastal areas.

## 4.2 Factors Exacerbating Access Inequalities

Past, present, and future conditions all affect coastal access inequalities. In addition to identifying barriers to coastal access in the coastal zone, factors that will exacerbate existing

inequalities to coastal access, such as sea level rise and the loss and limited supply of affordable housing and lower-cost overnight accommodations, should also be considered when developing LCP policies and evaluating coastal access environmental justice impacts. It is critical to also look at cumulative impacts; some of these factors create new barriers or worsen existing ones. For example, sea level rise will directly affect coastal access by increasing the likelihood that public recreation amenities and transportation infrastructure will become inundated or damaged. Sea level rise will exacerbate existing erosion and beach loss near shoreline armoring. These impacts from sea level rise will disproportionately affect environmental justice communities who do not live near the coast, often cannot afford to live there or visit often, and rely on free public access to the beach and low-cost recreation amenities and accommodations.

A shortage of affordable housing, high cost of living, and limited lower-cost accommodations place additional pressures on environmental justice communities, whether they live in the coastal zone or visit for work or recreation. Without lower-cost places to stay for an overnight trip, there are fewer opportunities for coastal access for those who cannot afford to live along the coast or pay for luxury accommodations. This pressure will worsen as sea level rise threatens the very existence of some of California's beaches and recreational opportunities. Table 4.1 identifies these and more exacerbating factors and how they relate to existing barriers.

### 4.3. Opportunities

Despite various factors affecting coastal access for environmental justice communities, there are many opportunities to create equitable access by addressing existing barriers and injustices and avoiding future harm. Under the existing authority provided by the Coastal Act to analyze the impacts of development on coastal resources, including access, the Commission and local governments may apply an environmental justice approach to evaluate coastal access impacts by including an analysis of existing barriers and inequalities in access experienced by environmental justice communities and whether the proposal will worsen existing or create new inequalities. It is strongly encouraged that these analyses consider impacts to environmental justice communities regardless of whether they live within the coastal zone or visit for work or recreation. For example, many people travel to the coast for work in industrial facilities, ports, agriculture, and the service and tourism industries. Others drive far to visit the coast for a weekend or have a day trip with their families.

Local jurisdictions can create policies that address coastal access inequities at the community scale through coastal land use planning. Table 4.1 identifies opportunities to develop policy solutions to address coastal access barriers and consider exacerbating factors discussed in this section.

**Table 4.1.** Types of Coastal Access Barriers, Exacerbating Factors, and Opportunities

	Examples of barriers	Exacerbating factors	Opportunities
Geographic	<ul style="list-style-type: none"> <li>• Exclusionary zoning (e.g., preferential parking programs, single family zoning)</li> <li>• Loss of free parking or affordable housing</li> <li>• Industrial land use and facilities with no coastal access or high pollution impacts</li> </ul>	<ul style="list-style-type: none"> <li>• Limited affordable housing supply in the coastal zone</li> <li>• New exclusionary zoning laws</li> <li>• Gentrification and displacement</li> </ul>	<ul style="list-style-type: none"> <li>• Inclusionary zoning and anti-displacement policies</li> <li>• Protection of free and low-cost parking</li> <li>• Designating affordable housing zones</li> <li>• Low-cost parking programs</li> <li>• Targeted public transportation</li> </ul>
Physical	<ul style="list-style-type: none"> <li>• Lack of public access sites</li> <li>• Temporary events on public space</li> <li>• Shoreline armoring devices</li> <li>• Private encroachments</li> <li>• Illegal “no trespassing” signs or gates</li> </ul>	<ul style="list-style-type: none"> <li>• Current and future coastal hazards, including erosion, flooding, and sea level rise</li> <li>• New shoreline armoring devices that reduce the public beach space</li> <li>• Coastal squeeze</li> </ul>	<ul style="list-style-type: none"> <li>• Increasing public access sites and amenities open to the public</li> <li>• Clear standards and guidelines to mitigate temporary and permanent impacts on beach loss</li> <li>• Avoid use of shoreline armoring devices If shoreline armoring is necessary, analyze and minimize loss of current and future public beach.</li> <li>• Prioritize implementation of nature-based adaptation strategies.</li> <li>• Identify opportunities for creation of new public access or green spaces in communities with less access to the coast</li> </ul>

Socio-economic and Demographic	<ul style="list-style-type: none"> <li>• Language of signs</li> <li>• Membership clubs</li> <li>• Conversion of lower cost accommodations to higher cost accommodations</li> <li>• Informal barriers (symbolism such as confederate flags or presence of security guards)</li> <li>• Restrictive surf permitting for non-profit coastal access</li> <li>• Informal social and intimidation tactics (such as localism) which degrades the sense of belonging and safety for surfers</li> <li>• Automated license plate readers in public right of way</li> </ul>	<ul style="list-style-type: none"> <li>• Limited affordable housing supply and lower cost accommodations</li> <li>• Lack of engagement with environmental justice communities</li> <li>• High cost, availability of permits to operate non-profit programming on the beach and/or ocean</li> </ul>	<ul style="list-style-type: none"> <li>• Establish a language access policy, requiring signs to be translated in Spanish and English at a minimum</li> <li>• Establish minimum requirements for onsite affordable lower-cost accommodations</li> <li>• Inclusive coastal access policies and permitting programs</li> <li>• Restrict use of private security guards on public property</li> <li>• Create free or low-cost educational and/or recreation programs for under-resourced communities</li> <li>• Lowered cost permits and equal opportunity for non-profit programming access to the beach and ocean</li> <li>• Require targeted engagement and culturally appropriate outreach for input on public access plans and programming</li> </ul>
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**Table 4.1.** This table identifies opportunities to develop policy solutions to address coastal access barriers and consider exacerbating factors discussed in this section.

While not exhaustive, Table 4.1 provides a starting point for thinking about creative solutions. Community input should be included in analyses and policy development, with targeted engagement of environmental justice communities both inside and outside of the coastal zone.



## 5. Conclusion

This document is a resource for local governments aiming to incorporate the Coastal Act and the Commission’s Environmental Justice Policy into their Local Coastal Programs (LCPs). The information in this document can help to support a pivotal shift in governmental approaches to planning and permitting—from perpetuating systemic inequities to actively addressing and rectifying them, thus advancing a more just and equitable society. The Commission and local jurisdictions are presented with a unique opportunity to take meaningful action by updating LCPs with policies that prioritize environmental justice principles and concerns. While not exhaustive, this document serves as a foundational framework for contemplating innovative solutions to pressing environmental justice challenges.

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