

Planning Commission Hearing

May 2, 2024 | PL23-0033

EXHIBIT 4

Clean Version of Proposed Amendments to the
Background Report for the General Plan

<p>County of Ventura Planning Commission Hearing Case No. PL23-0033 Exhibit 4 - Clean Version of Proposed Amendments to the Background Report for the General Plan</p>
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SECTION 4.4 ACTIVE AND HEALTHY LIVING

Introduction

There are many health benefits associated with convenient access to public transit and active transportation (e.g., walking, biking), including increased physical activity and reduced air pollution from vehicle emissions. Proximity to transit improves access to social, medical, employment, and recreational activities, and using public transit helps people meet minimum requirements for physical activity as it imbeds physical activity into everyday life. Pedestrian and bicycle trips do not contribute to noise or air pollution emissions, including ozone and particulate matter, which are risk factors for cardiovascular mortality and respiratory disease and illness.

Leading an active and healthy life is easier when opportunities to walk and bike are available and when people feel safe and welcome doing so. Implementation measures include human-scaled design and sidewalk maintenance to ensure a pleasant and welcoming public space. Pedestrian and bicyclist safety is also critical to address to promote active and healthy lifestyles.

Major Findings

- Historic development patterns within unincorporated communities often do not support safe and accessible walking, physical activity, or recreation.
- The current land use mix in the unincorporated county promotes an automobile-centric lifestyle since different types of destinations are not within walking distance.
- The County does not have a plan for pedestrian facilities.
- Due to higher percentages of transit-dependent populations, the Piru, Santa Paula, Moorpark, Las Posas, Ojai, and Oak Park areas may have greater need for public transit improvements and transit connectivity
- Ventura County has abundant active open space areas, although additional study may be necessary to evaluate connectivity and access to existing active open spaces.
- There is one federally-funded Safe Routes to School project within the unincorporated county.
- Communities around Oxnard and slightly south of Port Hueneme are experiencing a disproportionately higher amount of pollution burden.

Existing Conditions

Land Use and Urban Development

As shown in Table 3-1 of Chapter 3 of this Background Report, rural residential, single-family, and manufactured/mobile homes account for 2.2 percent of land use area within the unincorporated county. There is a negligible amount of commercial development, and less than one percent of industrial land uses. Commercial businesses, office buildings, and educational facilities are typically located in commercial strips, business parks, and on large campuses, maintaining separation between where people live and where entertainment, services, and schools are located. This type of land use mix promotes an

automobile-centric lifestyle since different types of destinations are not within walking distance, decreasing opportunities for physical activity within daily life, which in turn can negatively impact health.

In addition, historic development patterns within unincorporated communities often do not support safe and accessible walking, physical activity, or recreation. For example, two existing county policies outlined below have limited the degree to which existing urban development supports active living.

Ventura County Pavement Policy

While sidewalks, street lighting, and street trees are often key components of an active community, the County's existing "Pavement Policy" first passed in 1968, restricts the use of the County's Road Fund to maintenance of existing roads only. As a result, the County mostly relies on developers to construct road improvements, including sidewalks and other pedestrian amenities. (Historically, the County has also applied for limited federal and state transportation grants.) While some infrastructure improvements are best accomplished by private developers, a patchwork of pedestrian improvements implemented as part of private development is not conducive to creating an ideal infrastructure for walking.

Legacy of Proposition 13 on County Parks

Resources for park improvements within the unincorporated areas of the county are also limited. Following the 1978 passage of Proposition 13, the Board of Supervisors affirmed the policy that regional parks be self-sustaining without contributions from the General Fund. This means that park development can only occur if a method of financing (other than the General Fund), is available for acquisition, construction, operation, and maintenance. This requirement may work for large regional parks, such as those along the beach where space rental fees for motor homes can be charged, but it is challenging for smaller parks that may serve smaller existing communities within the unincorporated area.

Transportation Connectivity

Development patterns in much of California, including Ventura County, tend to be automobile-centric, prioritizing the efficiency of automobile traffic over other forms of transportation. For instance, streets are designed to be wide to accommodate increasing levels of traffic. Wide streets and lanes without pedestrian features, and increased distances between crosswalks encourage faster driving, while discouraging walking. As of 2016, the County does not have a plan for pedestrian facilities. Additionally, based on the discussion of land use and urban design, it appears that unincorporated areas of the county, including the urbanized areas, don't include policies that encourage or promote walking.

In areas where people drive faster, businesses tend to locate further back from the street edge and use bigger and higher signs that are intended to be read at a distance while driving in a car. On the other hand, narrower streets with landscaping and regular crossings, encourages safer driving and more walking. Ensuring the safety of pedestrians and bicyclists is important for encouraging people to choose walking and biking over driving.

Any kind of transportation other than driving is considered an alternate mode of transportation. This includes biking, walking, and the use of public transportation. Improving connectivity between different modes of transportation increases the convenience of getting around without a car. This is especially important for those who are "transit-dependent." Transit-dependents, as defined in Chapter 6, are people who, due to disability, age, and/or economic status, do not have access to a vehicle or are unable to drive, and, therefore, rely on public or private transportation services. In the unincorporated county, the two largest age groups are those under 18 and those between ages 25 and 64. The majority of the population

under 18 is younger than 16, and is therefore, not legally able to drive. This means that alternate modes of transportation are critical, especially if they do not have anyone to drive them. However, the greatest increase in county population is in people 65 years and over (2010-2016). This cohort grew by over 17 percent, mirroring trends seen in Ventura County's cities, as well as in California as a whole. The planning areas with the highest percentages of people age 65 and over are Moorpark (21 percent), Las Posas (20 percent), and Ojai (19 percent), while Oak Park (23 percent), Piru (21 percent), and Santa Paula (20 percent) planning areas have the highest proportion of people under 18 years. Due to higher percentages of transit-dependent populations, the Piru, Santa Paula, Moorpark, Las Posas, Ojai, and Oak Park areas may have greater need for public transit improvements and transit connectivity.

These transportation considerations are part of the state's "Complete Streets" framework, and are discussed in greater detail in Chapter 6.

Active Open Spaces

Having access to active open spaces has both mental and physical health benefits. As discussed in the Chapter 7 (Public Facilities, Services, and Infrastructure), Ventura County has land devoted to active open spaces (e.g., trails, playgrounds, campgrounds), although additional study may be necessary to evaluate connectivity between amenities and access to existing active open spaces.

Safety

Safe Routes to School

Walking and biking to school is one way to increase the amount of physical activity children engage in on a daily basis. Due to distance and/or safety concerns, however, many parents opt to drive their children to school, increasing congestion and worsening air quality near schools, and decreasing the amount of time children are active. There are five Federally-funded Safe Routes to School projects in Ventura County, but only one within the unincorporated county, in El Rio near Rio Del Valle Junior High School. This project proposed to install traffic signals, crosswalks, and bike lanes, as well as construct sidewalks. The project location is on the south side of Rose Avenue and Collins Street, and on Rose Avenue between Collins Street and Orange Drive.

Crime

Crime rates are important to consider when encouraging people to be more active. If crime rates are high in a neighborhood, people will be less likely to walk, bike, or use public transportation. Violent crime in the unincorporated county accounts for 31 percent of total countywide violent crimes, the majority of which is classified as "aggravated assault." See Chapter 7 (Public Facilities, Services, and Infrastructure) for an expanded discussion of law enforcement and emergency services.

Air Quality

Healthy air quality is important for promoting an active lifestyle. It is counterproductive to encourage people to be active outside when environmental conditions outdoors could put them at higher risk of developing respiratory diseases. Additionally, promoting good air quality supports the statewide goals of reducing GHG emissions and other pollutants. See Chapter 8 (Natural Resources) for a detailed discussion of air quality and the different types of pollution faced by communities in Ventura County.

Smoke-free Places

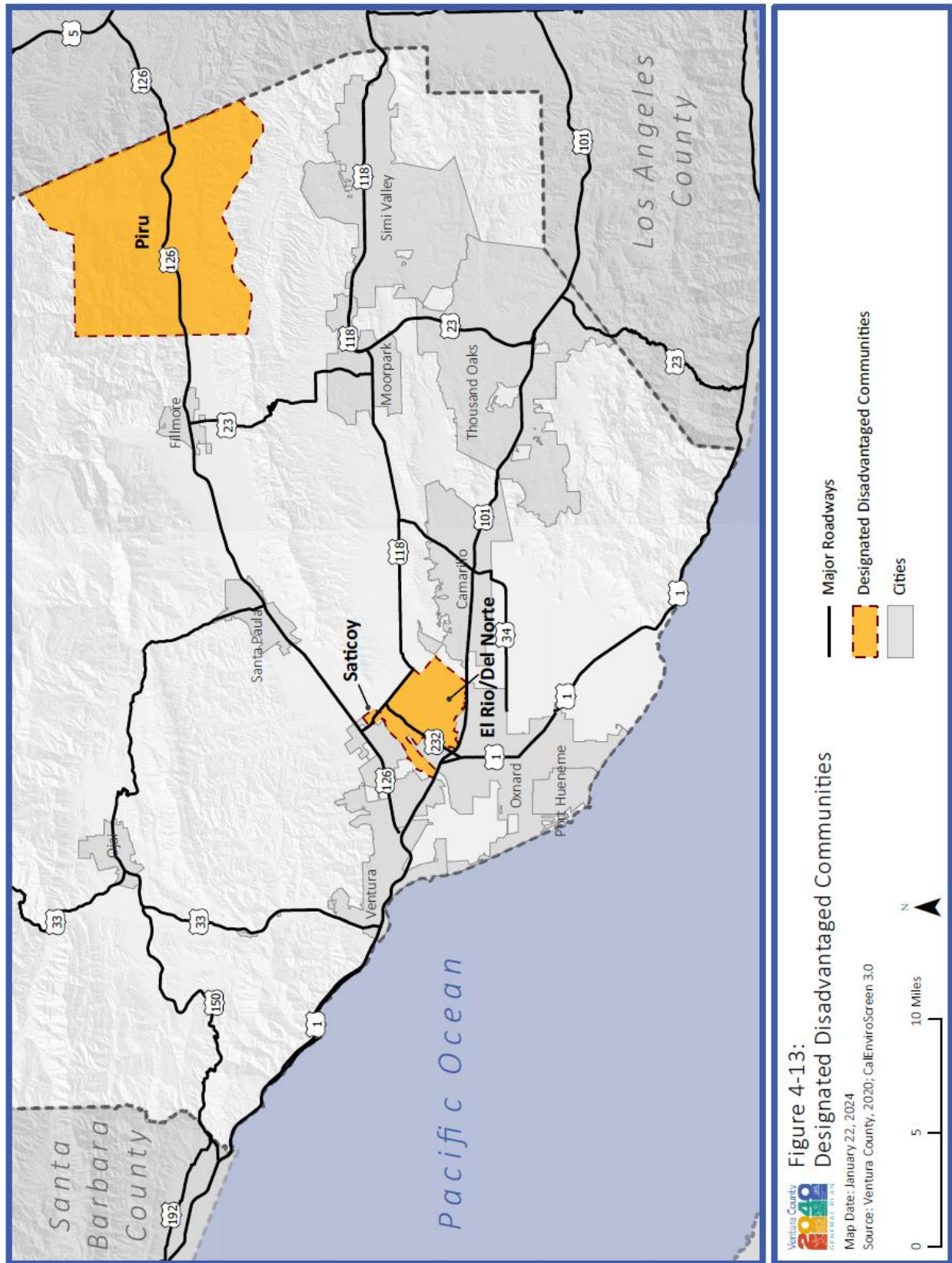
Since tobacco use is the leading cause of premature and preventable death in the United States, it is important to prevent and reduce tobacco use and protect people from secondhand smoke in public settings, such as parks, recreation areas, work sites, schools, multi-unit housing, etc. As with many other health indicators, smoking prevalence differs by socioeconomic status; individuals with lower income, less education, and those who receive public insurance are more likely to be smokers. Living tobacco-free lowers a person's risk of developing lung cancer, heart disease, and other diseases and causes of death related to tobacco use. Tobacco-free living means avoiding use of all types of tobacco products such as cigarettes, cigars, smokeless tobacco, hookahs as well as electronic cigarettes (a nicotine delivery system) and also living free from secondhand smoke exposure. Policies requiring signage within buildings and around the peripheries of buildings can help enforce a smoke-free environment. In 2013, 13.1 percent of Ventura County adults smoked. Additional tobacco-free living indicators include: Adults with Asthma; Age-Adjusted ER Rate due to Asthma; Age-Adjusted ER Rate due to COPD; Age-Adjusted ER Rate due to Pediatric Asthma; Children and Teens with Asthma; Youth who Smoke.

Environmental Air Quality

Chapter 12 (Climate Change) notes that on April 2, 2007, the United States Supreme Court ruled that CO₂ is identified as an air pollutant under the federal Clean Air Act (CAA). Furthermore, on December 7, 2009, in their adopted Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under the CAA, the U. S. Environmental Protection Agency (EPA) determined that greenhouse gas (GHG) emissions from new motor vehicles and motor vehicle engines are contributing to air pollution, which the EPA found is endangering public health and welfare. EPA's final findings respond to the 2007 Supreme Court decision that GHGs fit within the CAA definition of air pollutants. In 2012, 53 percent of Ventura County greenhouse gas (GHG) emissions came from on-road transportation; although in unincorporated Ventura County, on-road transportation only accounts for 19 percent of GHG emissions while non-residential electricity use accounts for 38 percent. Chapter 8, Section 8.1 notes that cars and trucks are the largest contributors of ozone precursor emissions within Ventura County. Within Ventura County ROG and NO_x emissions are declining, coming closer to meeting CAAQS and NAAQS for ozone. As of October 2015, however, Ventura County was listed as a serious nonattainment area for the NAAQS for 8-hour ozone. Additionally, as the county and region continue to grow and population increases, ROG emissions are expected to increase as well. Furthermore, climate change and expected increases in temperature could lead to increased smog.

Environmental Hazards

In response to increasing concerns about vulnerable communities in California experiencing instances of environmental injustice, the State Legislature passed and Governor Brown signed Senate Bill 1000 (SB 1000). SB 1000 requires that general plans adopted after January 2018 include either a stand-alone environmental justice element or goals, policies, and objectives addressing environmental justice integrated in other elements. The law also requires general plans to identify disadvantaged communities within the area covered by the general plan of a city, county, or city and county, with a reference to CalEnviroScreen as a means for such identification. See Chapter 3, Land Use, Section 3.11, Environmental Justice and Disadvantaged Communities, for further discussion of environmental justice and disadvantaged communities in Ventura County, and also refer to Figure 4-13 for locations of these Disadvantaged Communities as identified during the General Plan Update.



Pursuant to Senate Bill (SB) 1000, a disadvantaged community is an area identified by the California Environmental Protection Agency (CalEPA) pursuant to Section 39711 of the Health and Safety Code, or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation. For the first component of the definition, pursuant to H&S Code section 39711, Cal EPA designates disadvantaged communities as areas within which census tracts scores are at or above 75 percent of all scores as identified by the CalEnviroScreen online mapping software created by California Office of Environmental Health Hazard Assessment (OEHHA), on behalf of CalEPA. CalEnviroScreen identifies which communities are most burdened by multiple pollution sources and vulnerable to their effects. The tool ranks each of the state's 8,000 census tracts using data on 20 indicators of pollution, environmental quality, and socioeconomic and public health conditions. For the second component of the definition, SB 1000 identifies a "low income area" as "an area with household incomes at or below 80 percent of the statewide median income", or an area 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 of the Health and Safety Code."

At the time of the adoption of the 2040 General Plan, no census tracts within any existing community in unincorporated Ventura County ranked among the highest 25 percent of all scores by CalEnviroScreen. Existing Communities are defined as areas designated as Existing Community in the 2040 General Plan and identified as such in the Save Open Space & Agricultural Resources (SOAR) initiative as renewed in 2016. These areas identify existing urban residential, commercial, or industrial enclaves outside of incorporated areas and urban centers. The Existing Community area designation applies to areas that include uses, densities, building intensities, and zoning designations that are normally found in incorporated areas or urban centers, but which do not qualify as urban centers.

Under the second component of the definition of a disadvantaged community, the community of El Rio is a low-income area with CalEnviroScreen individual pollution indicator scores of 75 percent or greater for potential exposure to drinking water contaminants, potential for exposure to pesticide use, proximity to road segments with high traffic density, proximity to impaired water bodies, and proximity to solid waste facilities. The community of Saticoy is a low-income area with CalEnviroScreen individual pollution indicator scores of 75 percent or greater for potential for exposure to hazardous and volatile pesticides, and proximity to solid waste facilities. The community of Piru is a low-income area with CalEnviroScreen individual pollution indicator scores of 75 percent or greater for ozone emissions, potential for exposure to hazardous and volatile pesticides, and proximity to impaired water bodies. The health risks and pollution burdens experienced by these communities are discussed in more detail below.

According to the January 2017 CalEnviroScreen 3.0 Report, California public water systems have a high rate of compliance with drinking water standards and approximately 97 percent of Californians using public systems received water that met all federal and state drinking water standards in 2014. However, drinking water quality varies with location, water source, treatment method, and the ability of the water purveyor to remove contaminants before distribution. According to the CalEnviroScreen Report, low income and rural communities, particularly those served by small community water systems, can be disproportionately exposed to contaminants in their drinking water. The drinking water contaminant index used in CalEnviroScreen 3.0 is not a measure of compliance with federal and state drinking water standards. The drinking water contaminant index is a combination of contaminant data that takes into account the relative concentrations of different contaminants and whether multiple contaminants are present. The indicator does not indicate whether water is safe to drink.

According to the CalEnviroScreen Report, communities near agricultural fields, primarily farm worker communities, may be at risk for exposure to pesticides. Drift or volatilization of pesticides from

agricultural fields can be a significant source of pesticide exposure. Pesticide use, especially use of volatile chemicals that can easily become airborne, can serve as an indicator of potential exposure. Similarly, unintended environmental damage from the use of pesticides may increase in areas with greater use. The specific measure of pesticide use for CalEnviroScreen scoring is based on the total pounds of selected active pesticide ingredients (filtered for hazard and volatility) used in production-agriculture per square mile, averaged over three years (2012 to 2014) based on pesticide use reporting to the California Department of Pesticide Regulation.

The CalEnviroScreen score for traffic density is derived from the sum of traffic volumes adjusted by road segment length (vehicle-kilometers per hour) divided by total road length (kilometers) within 150 meters of each census tract boundary. Traffic density is used to represent the number of mobile sources in a specified area, resulting in human exposures to chemicals that are released into the air by vehicle exhaust, as well as other effects related to large concentrations of motor vehicles. According to the CalEnviroScreen Report, major roadways have been associated with a variety of effects on communities, including noise, vibration, injuries, and local land use changes such as increased numbers of gas stations. The Report also cites studies showing that non-white and low-income people make up the majority of residents in high-traffic areas and that schools that are located near busy roads are more likely to be in poor neighborhoods, and that Latinos, non-whites, foreign born and people who speak a language other than English at home were most likely to live within 150 meters of a major highway.

Impaired Water Bodies are streams, rivers, and lakes that have been contaminated by pollutants and subsequently compromised as sources for drinking, swimming, fishing, aquatic life protection, and other beneficial uses. Listing a water body as impaired in California is governed by the Water Quality Control Policy for developing California's Clean Water Act Section 303(d) Listing Policy. The State and Regional Water Boards assess water quality data for California's waters every two years to determine if they contain pollutants at levels that exceed protective water quality criteria and standards. These regular assessments are required by the Federal Clean Water Act.

The presence of solid waste sites and facilities may cause contamination of air, water, and/or soil with hazardous materials. Though many new solid waste landfills are designed to prevent contamination, older sites and facilities are often out of compliance with current standards, and/or illegal solid waste sites may degrade environmental conditions and threaten exposure. Solid waste sites can pose multiple impacts on a community, including exposure of waste gases like methane and carbon dioxide, even after site closure. Odors often impair a community's perceived desirability and affect the health and quality of life of residents.

According to the CalEnviroScreen, the score for solid waste facilities in census tracts in the communities of Mira Monte and Meiners Oaks in the Ojai Valley are greater than 75 percent based on their proximity to the following facilities:

- Ojai Valley Organics, 140 Old Baldwin Road, Ojai
- CalTrans Ojai Maintenance Station, 1116 Maricopa Highway, Ojai
- Former dump site closed in 1964, Old Baldwin Road, Ojai

Based on further review of these sites, these facilities do not pose a pollutant exposure risk or health hazard to nearby communities. The Ojai Valley Organics site closed in November 2019 and all related material and equipment have been removed. The CalTrans Ojai Maintenance Station, which is a transfer processing facility for handling freeway sweepings, litter, and landscape green waste, is operating under an active permit and is in compliance with Local Enforcement Agency imposed state minimum standards. Furthermore, inspection report records show no violations or areas of concern since 2011 when the facility opened. The former dump site on Old Baldwin Road is a pre-regulation closed disposal site which is inspected quarterly by the Ventura County Environmental Health Division as the Local Enforcement Agency. No areas of concern or violation relating to pollutant releases have been noted from 1996 to present. Based on the foregoing, Mira Monte and Meiners Oaks are not considered as disadvantaged communities pursuant to SB 1000.

El Rio/Del Norte Community

The El Rio/Del Norte community (which includes Nyeland Acres) is adjacent to the City of Oxnard, just northeast of U.S. Highway 101 and south of the Santa Clara River. It is within the City of Oxnard Sphere of Influence. As reflected in Table 2-3, the 2016 population for El Rio was estimated to be 6,945. Table 2-9, the average median household income in the El Rio community for 2014 was \$59,179.

Based on CalEnviroScreen individual pollution indicator scores, this community has scores that are 75 percent or greater for potential exposure to drinking water contaminants, potential for exposure to hazardous and volatile pesticides, proximity to road segments with traffic density, proximity to impaired water bodies, and proximity to solid waste facilities.

Water service for the El Rio/Del Norte community is provided by the Vineyard Acres Mutual Water Company, Cloverdale Mutual Water Company, El Rio Plaza Water Company, as well as several other small water purveyors.

The Brown Barranca drains/flows into the Santa Clara River, which is in the northern portion of the El Rio/Del Norte planning area, as recorded on the CalEPA 303(d) List. According to the CalEnviroScreen 3.0 Impaired Water Bodies Map, portions of the El Rio community are in the 98th percentile and either contain, or are in close proximity to, 18 documented impairments to waterbodies. The Brown Barranca pollutants include nitrate and nitrite. The estimated affected area is approximately 2.6 linear miles and potential sources of contamination have been identified as agriculture-storm water runoff. Calleguas Creek Reach 5, previously referred to as Beardsley Channel on the 1998 303(d) List, is also listed as an Impaired Water Body. This body of water is adjacent to the El Rio/Del Norte southern boundary. The estimated affected area is 4.3 linear miles and pollutants from agriculture-storm runoff, diazinon, and sedimentation. Trash is also prevalent and is a result from agriculture-storm runoff, recreation and tourism activities (non-boating related), and urban runoff/storm sewers. Additional impaired water bodies include the Santa Clara River Reach 3 (Freeman Diversion to A Street) which encompasses approximately 31 linear miles of affected areas, and Fox Barranca which encompasses 6.7 linear miles of assessed area and is a tributary to Calleguas Creek Reach 6.

According to CalEnviroScreen, Census Tract 06111005100 in El Rio has a 96th percentile rating for solid waste sites, meaning the potential exposure to pollutants from nearby solid waste sites is higher than 96 percent of the state's census tracts. This indicator is calculated by considering the number of solid waste facilities, including illegal sites, the weighted prioritization score of each site, and the distance to the census tract. Based on available data, the solid waste sites are located in the eastern portion of the census tract, away from the El Rio/Del Norte planning area. These sites include the Somis Dump (solid waste disposal site), BMB Norcom 355 (inert debris ENG fill operation), and Balcom Canyon II and III.

All of El Rio is in the 97th percentile or higher for potential exposure to hazardous and volatile pesticides. One of the El Rio Census Tracts is ranked fourth highest in the state for pesticide exposure, and 10 out of the top 15 census tracts in the state are adjacent or nearby. These rankings are based on total pounds of selected active pesticide ingredients used in production-agriculture per square mile, and are above 10,000 pounds per square mile for the three Census Tracts in El Rio, and over 66,000 pounds per square mile for Census Tract 06111005003.

Additionally, Census Tract 06111005004 is in the 75th percentile for traffic density, with 1,204 vehicle-kilometers per hour per road length. This is the Census Tract which lies at the intersection of Oxnard Boulevard and Highway 101, and also contains The Collection at RiverPark development. The other two El Rio Census Tracts are ranked in the 56th and 17th percentiles for traffic density.

Population & Socioeconomic Indicators

According to CalEnviroScreen, none of the Census Tracts in El Rio are above the 51st percentile for the population characteristics indicator, which is a measure of socioeconomic factors and health issues. However, one of the Census Tracts (06111005003), comprising the majority of the El Rio community ranked highly for the percent of the population over 25 with less than a high school education, and the percent of limited English-speaking households, in the 89th and 84th percentiles, respectively. For two of El Rio's Census Tracts, the percent of the population living two times below the federal poverty level is above 30 percent, and the unemployment rate is above seven percent. These indicators are still in line with or somewhat below the state average, as are indicators for health, including percentage of the population with asthma, low birth weight, or cardiovascular disease.

Saticoy Community

The Saticoy Area Plan boundary includes approximately 240 acres and is bounded by the Santa Clara River to the south, Aster Street to the north, Brown Barranca and the City of Ventura to the west, and the Franklin Barranca and agricultural uses to the east. The Saticoy community is located within the City of Ventura's (City) sphere of influence. Based on the 2010 U.S. Census demographic data, the Saticoy community consists of 1,029 residents and has a median household income of \$21,343. Saticoy is classified by the State of California as a "severely economically disadvantaged community" pursuant to Health and Safety Code Sec. 116760.2.

Based on CalEnviroScreen individual pollution indicator scores, this community has scores that are 75 percent or greater for potential for exposure to hazardous and volatile pesticides, and proximity to solid waste facilities.

Years of disinvestment and outdated policies have taken their toll on the Saticoy community. Vacant buildings exist throughout the community, and disconnected, vehicular-oriented streets lack basic pedestrian amenities such as sidewalks or street lighting. Job opportunities and access to affordable housing are limited, and existing circulation and land use patterns have hindered economic growth. In addition, aging and inadequate infrastructure (e.g., wastewater treatment capacity, access to potable water, and undersized flood control facilities) has limited Saticoy's redevelopment potential.

Water service is provided to the Saticoy community from the City of Ventura and regulated by the City's Extraterritorial Water Service Policy.

The Saticoy Sanitary District (SSD) is an independent special district that serves the Saticoy community with sewer services. Saticoy faces wastewater infrastructures challenges, including aging sewer pipes and sewage plant capacity limitations.

Population & Socioeconomic Indicators

Two Census Tracts lie within the Saticoy community, both of which have overall population characteristics scores approximately on par with the state average, according to CalEnviroScreen. The unemployment rate for Census Tract 06111001301 is 14 percent as of 2018, which puts it in the 81st percentile for the state. However, indicators for poverty, households burdened by housing costs, and educational attainment are about average or somewhat better than average. For percentage of the population with cardiovascular disease or asthma, Saticoy is in the 65th and 38th percentiles, respectively, and approximately the 57th percentile for percentage of the population with low birth weight.

Piru Community

Existing information pertaining to fire protection, water, wastewater and stormwater drainage services for the Piru community can be found in Section 3.11 of the Background Report under the discussion of Senate Bill 244.

Based on CalEnviroScreen individual pollution indicator scores, this community has scores that are 75 percent or greater for potential for ozone emissions, potential for exposure to hazardous and volatile pesticides, and proximity to impaired water bodies.

According to the CalEnviroScreen Impaired Water Bodies Map, Census Tract 06111000200 in Piru is in the 96th percentile and either contains, or is in close proximity to, 15 documented impairments to waterbodies. As identified by the CalEPA's 303(d) List, Lake Piru is located in Region 4 and flows into Piru Creek, through the community of Piru, and ultimately into the Santa Clara River. Both Lake Piru and Piru Creek contain several pollutants, including chloride, boron, specific conductance, sulfates, and dissolved solids. The sources of contamination are unknown. Lake Piru is also connected to Pyramid Lake, which is upstream and north of Lake Piru via Piru Creek; Pyramid Lake is also a listed Impaired Water Body. The estimated affected area is approximately 67 linear miles.

Piru also scores in the 78th percentile for ozone concentration, and the 87th percentile for potential for pesticide exposure, with 675 pounds of pesticide ingredients being used in production-agriculture per square mile.

Population & Socioeconomic Indicators

Piru scores above the 75th percentile for several socioeconomic indicators. The percent of the population over 25 with less than a high school education is 42 percent, which places it in the 89th percentile statewide. In addition, 16 percent of the households in the Census Tract Piru are within are limited English speaking (77th percentile), and 55 percent of the population live below two times the federal poverty level (79th percentile). Piru also scores in the 82nd percentile for CalEnviroScreen's cardiovascular disease indicator (11 emergency room visits for heart attacks per 10,000 people).

Designation of Additional Disadvantaged Communities Through General Plan Program LU-Q

Following the adoption of the General Plan in September 2020, the Planning Division initiated General Plan Implementation Program LU-Q: Identify Designated Disadvantaged Communities in Oxnard and

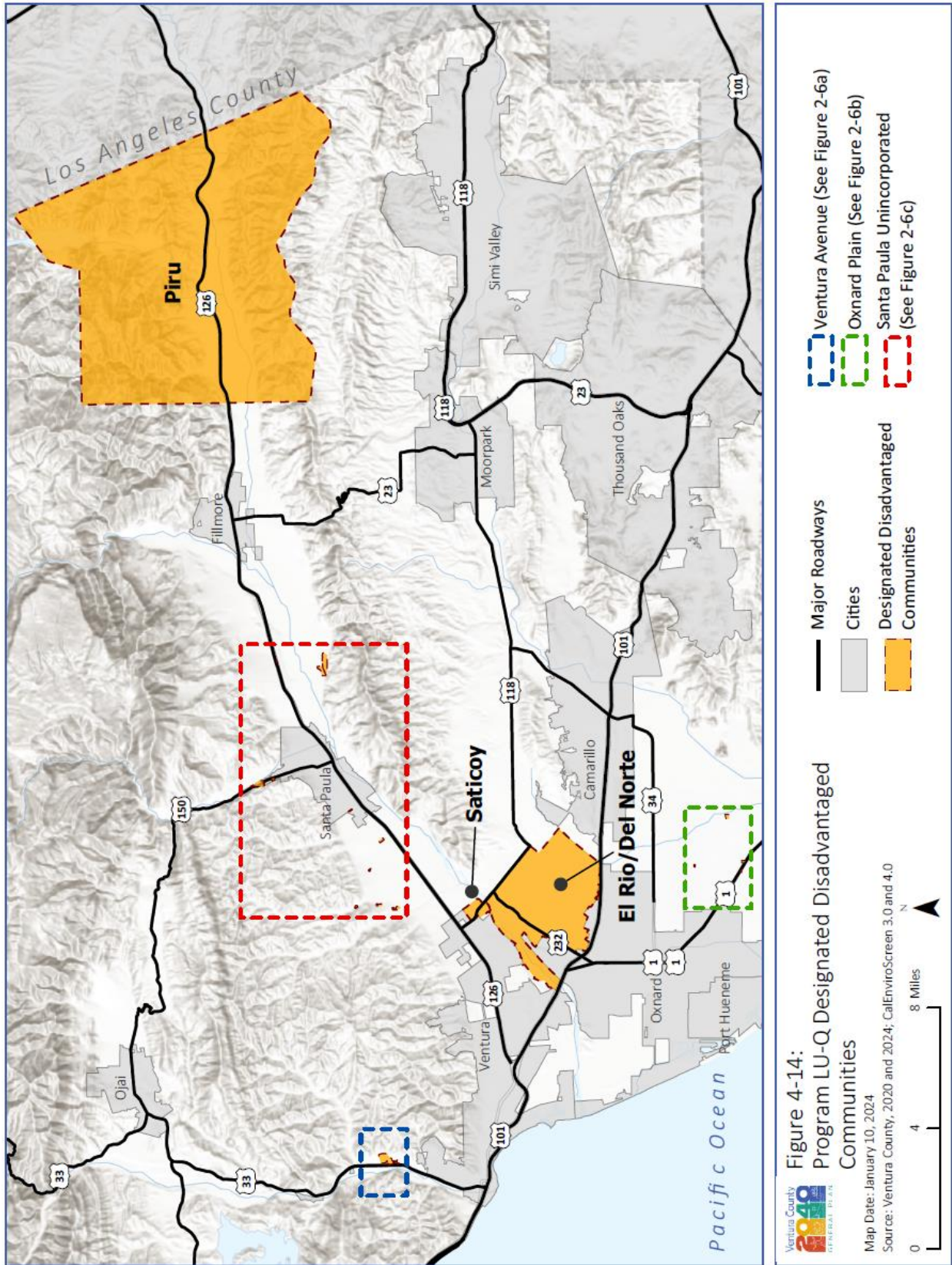
Ventura Planning Areas. Program LU-Q required the County to research the Oxnard Planning Area and Ventura Planning Area to identify additional disadvantaged communities, if any. The Planning Division conducted a study pursuant to Program LU-Q and presented both the study and options for identifying additional disadvantaged communities to the Planning Commission and the Board of Supervisors in 2023. See Appendix 4.A for the Planning Division’s study and detailed supporting information. The study was conducted pursuant to SB 1000 in consideration of data obtained from CalEnviroScreen version 4.0, which was released by OEHHA in October 2021. Other study considerations include income information from the United States Census Bureau, localized county information, and community input.

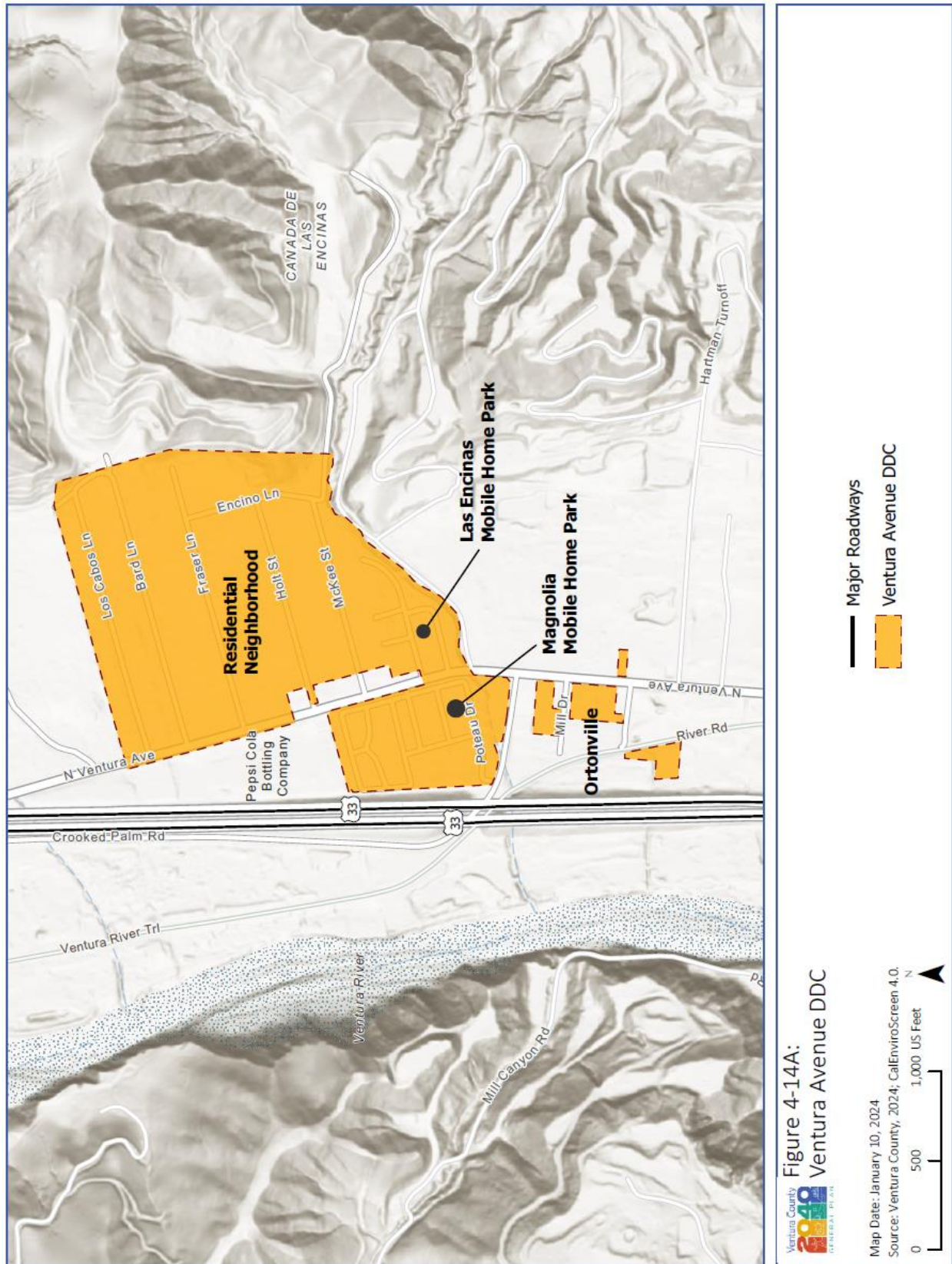
On December 5, 2023, the Board of Supervisors considered Planning staff’s proposals with regard to Program LU-Q, and directed staff to process a General Plan amendment to update the Ventura County General Plan to include the additional designated disadvantaged communities identified in Exhibit 2 of the December 5, 2023 board letter, with the exception of the Valley Vista neighborhood which is to be excluded from the designation, and limiting the designations of farmworker housing in the Santa Paula and Oxnard Planning Areas to only include farmworker dwelling structures and not the entire lot on which the farmworker housing is located. Refer to Figures 4-14 through 4-14C for maps of these areas. A summary of these disadvantaged communities is provided below.

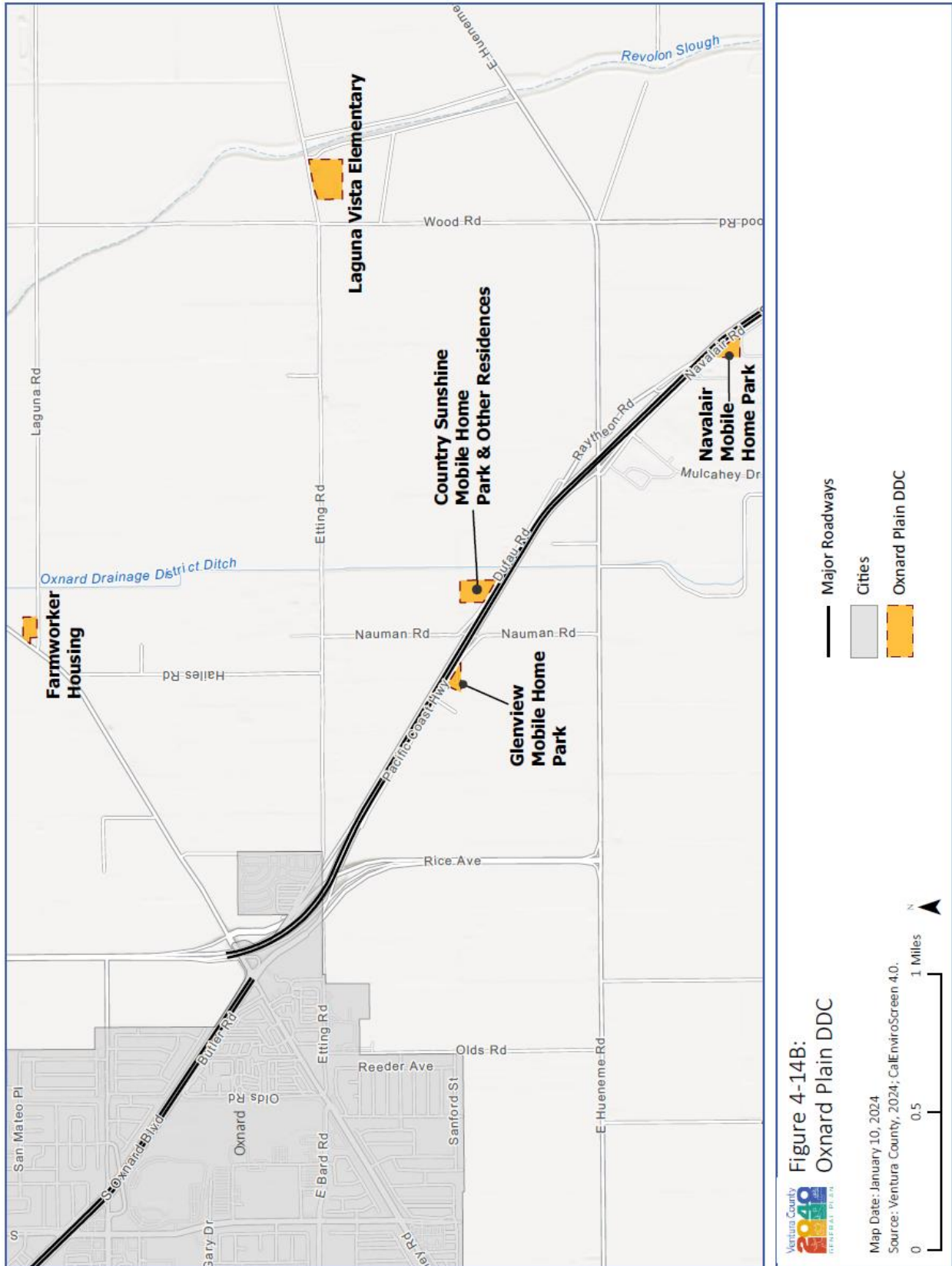
The Ventura Avenue DDC includes the Magnolia Mobile Home Park, Las Encinas Mobile Home Park, and the residential neighborhood along North Ventura Avenue between Manuel Canyon Road and Crooked Palm Road, as well as homes in the Ortonville neighborhood. The community abuts existing industrial and oil and gas operations along North Ventura Avenue, including the Pepsi bottling factory, automotive storage facilities, and oil extraction wells. The Ventura Avenue DDC is located within Census Tract 6111001204, which has CalEnviroScreen individual pollution indicator scores of 75 percent or greater for children’s potential exposure to lead in older housing, proximity to hazardous waste generators and facilities, and proximity to impaired water bodies.

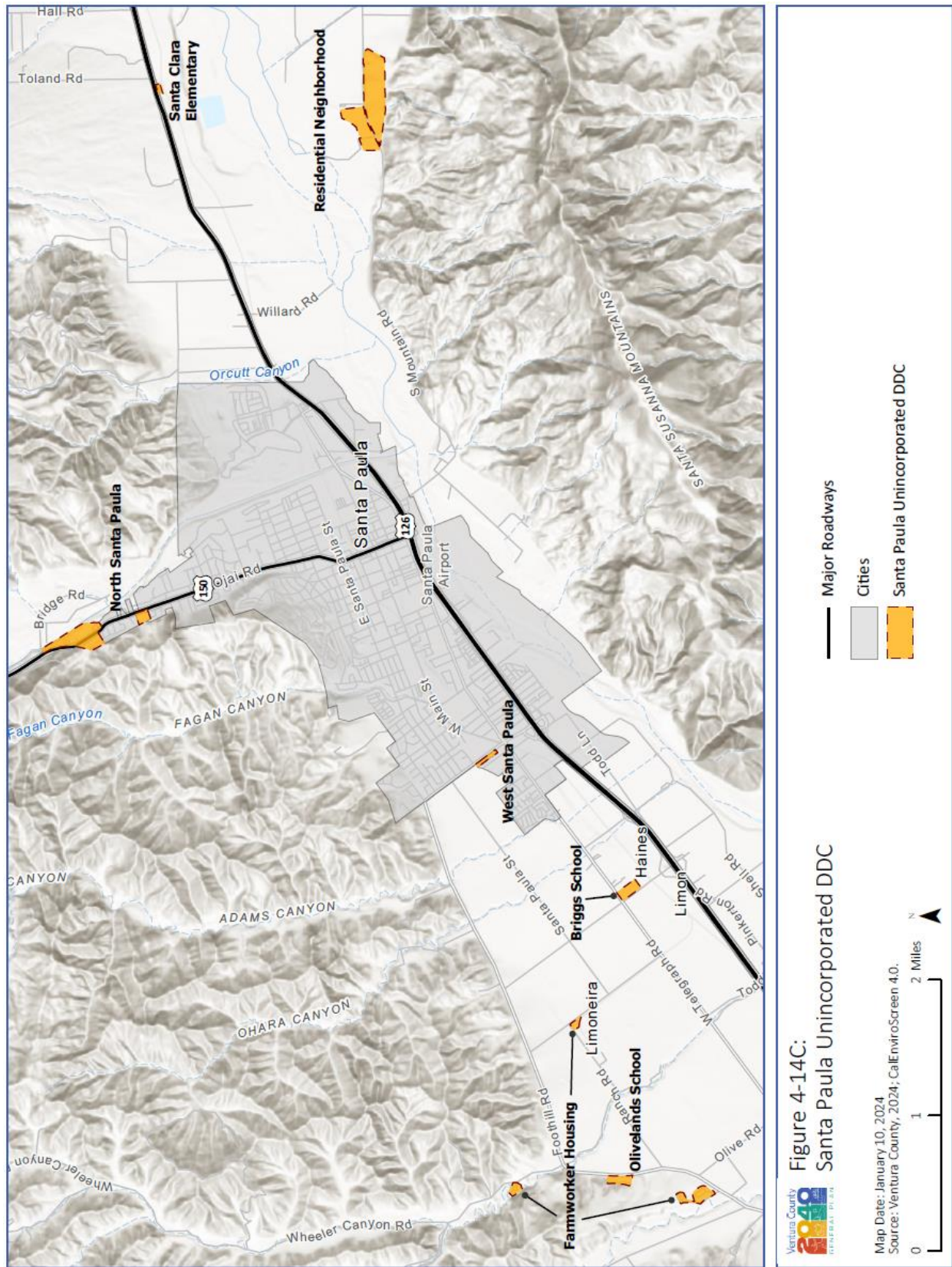
The Oxnard Plain DDC includes Glenview Mobile Home Park, Country Sunshine Mobile Home Park and abutting residences, Navalair Mobile Home Park, one farmworker housing development along Pleasant Valley Road and Laguna Road, and Laguna Vista Elementary, all of which are located among agricultural fields and uses in the Oxnard Plain. Census Tract 6111004704 in the Oxnard Plain DDC is a low-income area with CalEnviroScreen individual pollution indicator scores of 75 percent or greater for potential exposure to drinking water contaminants, potential exposure to pesticide use, and proximity to impaired water bodies. The Oxnard Plain DDC ranks above the 80th and 84th percentile respectively for those over the age of 25 with less than a high school education and those with incomes less than two times the federal poverty level.

The Santa Paula Unincorporated DDC includes two farmworker housing developments in Aliso Canyon and Wheeler Canyon along Foothill Road, the farmworker housing development at the Limoneira Company headquarters on Cummings Road, Oliveland School, Briggs School, and Santa Clara Elementary, as well as the West Santa Paula Existing Community, the North Santa Paula Existing Community, and the residential neighborhood along South Mountain Road. The farmworker housing developments, schools, and neighborhoods are within census tracts with CalEnviroScreen individual pollution indicator scores of 75 percent or greater for children’s potential exposure to lead in older housing, potential exposure to pesticide use, proximity to hazardous waste generators and facilities, and proximity to impaired water bodies. The Santa Paula Unincorporated DDC also ranks above the 80th percentile for those over the age of 25 with less than a high school education.









Regulatory Setting

Federal

Clean Air Act.

Please see Chapter 8 for a description of this legislation.

State

Safe Routes to School

The California Streets & Highways Code Section 2333.5 established the State-legislated Safe Routes to School (SR2S) Program. It was extended indefinitely by Assembly Bill 57 (Chapter 673, Statutes of 2007) in 2007. Both cities and counties may apply for the grant to fund infrastructure improvement projects within the vicinity of a K-12 school. Local jurisdictions are required to match 10 percent of the grant. Projects are expected to be completed within 4.5 years of project funds allocation. There have been 10 cycles completed as of 2016.

California Indoor Clean Air Act of 1976

California Health and Safety Code Sections 118875-118915 (Article 1) and Sections 118920-118945 (Article 2), together commonly referred to as the California Indoor Clean Air Act of 1976, recognizes tobacco smoke as a health hazard of the general public and regulates the smoking of tobacco products in public places to protect the health, safety, welfare, comfort, and environment of non-smokers. Requirements of signage for designated non-smoking and smoking areas and restrictions on amount of space that may be designated for smoking areas are defined for different types of public spaces. These defined public spaces are indoor public meeting spaces, health facilities, gathering spaces for performances or sporting events, restaurants, retail food establishments, and public transportation spaces, including planes, vehicles, trains, and waiting areas for use of public transportation.

Transit-Oriented Development Implementation Fund

The California Health and Safety Code Section 53562a,b,c) allows the Health Department to make grants to cities, counties, cities and counties, or transit agencies to carry out infrastructure projects that develop higher-density uses near a transit station, or to facilitate connections between developments and a station.

Fixing America's Surface Transportation Act (FAST) Act

The FAST Act funds the Rides to Wellness Demonstration and Innovative Coordinated Access and Mobility Grants: Federal Transit Authority setting aside \$5.3 million to test promising and replicable public transportation health care access solutions that support 1) increased access to care, 2) improved health outcomes and reduced health care costs. An expanded description of this legislation can be found in Chapter 6.

Senate Bill 1000 (SB 1000)

SB 1000 was passed in 2016, and requires jurisdictions to identify environmentally disadvantaged communities and develop measures to mitigate the adverse effects. SB 1000 uses the California

Environmental Protection Agency definition of disadvantaged communities, which is based on Senate Bill 535. The definition of an environmentally disadvantaged community is based on scores derived from CalEnviroScreen, among other factors. Census tracts that rank within the highest (worst) 25 percent of all scores are defined as a disadvantaged community.

Key Terms

Transit Dependents. These are persons who, due to disability, age, and/or economic status, do not have access to a vehicle and rely on public or private transportation services.

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APPENDIX 4.A STUDY OF ADDITIONAL POTENTIAL DISADVANTAGED COMMUNITY DESIGNATIONS

This appendix includes a report that describes the research conducted by the Planning Division, pursuant to General Plan Program LU-Q, regarding the identification of additional disadvantaged communities in the unincorporated areas of Ventura, Santa Paula, and Oxnard.

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Study of Additional Potential Disadvantaged Community Designations



COUNTY *of* VENTURA

November 2023

Study of Additional Potential Disadvantaged Community Designations

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Acronyms

AB	Assembly Bill
ACS	American Community Survey
APCD	Ventura County Air Pollution Control District
AWM	Ventura County Department of Agriculture/Weights & Measures
CalEPA	California Environmental Protection Agency
CAL-FIRE	Office of the State Fire Marshal
CALAFCo	California Association of Local Agency Formation Commissions
CalEnviroScreen	California Communities Environmental Health Screening Tool
CAPP	Community Air Protection Program
CARB	California Air Resources Board
CAUSE	Central Coast Alliance United for a Sustainable Economy
CCR	California Code of Regulations
CUPA	Certified Unified Program Agency
DDCs	Designated Disadvantaged Communities
DPR	California Department of Pesticide Regulation
DWR	California Department of Water Resources
EHD	Ventura County Environmental Health Division
EJScreen	Environmental Justice Screening and Mapping Tool
FAQ	Frequently Asked Questions
HCD	California Department of Housing and Community Development
HHW	Household Hazardous Waste
LAFCo	Local Agency Formation Commission
LU-Q	Land Use Element Implementation Program Q
NASA	National Aeronautics and Space Administration
OEHHA	Office of Environmental Health Hazard Assessment

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OPR	G o v e r n o r ' s O f f i c e o f P l a n n i n g a n d R e s e a r c h
PUE	Pesticide Use Enforcement
PM 2.5	Particulate matter less than 2.5 micrometers
RA	Rural Agricultural
SB	Senate Bill
SCAG	Southern California Association of Governments
SWRCB	State Water Resources Control Board
TRI	Toxic Release Inventory
TMDL	Total Maximum Daily Load
US	United States
USCEQ	United States Council on Environmental Quality
USEPA	US Environmental Protection Agency
USTs	Underground storage tanks
VC Resilient	Ventura County Resilient Coastal Adaptation Project

Key Terms and Definitions

Area of Interest: A plan adopted by the Ventura County Local Agency Formation Commission (LAFCo) which divides the county into major geographic areas reflective of community and planning identity. Areas of Interest are mapped in [Figure 2-3 of the General Plan](#)¹.

Area Plan: The land use plans for specific geographic subareas within unincorporated Ventura County. Area Plans govern the distribution, general location, and extent of uses of the land for housing, business, industry, open space, agriculture, and public facilities. Area Plans are identified in [Figure 2-2 in the General Plan](#).¹

Designated Disadvantaged Community: An area identified by the California Environmental Protection Agency (CalEPA) pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.

For the 2040 General Plan, Designated Disadvantaged Communities are areas within which census tracts scores are at or above 75 percent as identified by the CalEnviroScreen (<https://oehha.ca.gov/calenviroscreen>) online mapping software by California Office of Environmental Health Hazard Assessment (OEHHA), or areas with median household incomes at or below 80 percent 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

Existing Community: Areas that identify existing urban residential, commercial, or industrial enclaves outside of incorporated areas (cities). The Existing Community boundaries are applied to specific areas identified in [Figure 2-1 of the General Plan](#).¹

Planning Area: Geographic subareas of the county that are coterminous to Areas of Interest established by LAFCo. They reflect zones within the county historically used by the Ventura County Transportation Commission for countywide transportation planning.

Program LU-Q: General Plan Implementation Program Q in the Land Use Element, *Identify Designated Disadvantaged Communities in Oxnard and Ventura Planning Areas*, which states, "With year of 2040 General Plan adoption, the County shall research the southwestern and northwestern Oxnard Planning Area and along the Ventura Avenue in the Ventura Planning Area using Cal EPA CalEnviroScreen to identify Designated Disadvantaged Communities (DDCs). Upon identification of DDCs, the General Plan maps and list of low income and disadvantaged communities in the General Plan will be updated. In addition, the Background Report will be updated to reflect the existing conditions and description of these DDCs."

Qualifying Census Tracts: CalEnviroScreen, the online mapping software developed by OEHHA and used by this Study to evaluate environmental pollution and socioeconomic burdens, aggregates its data based on census tracts as defined by the United States (US) Census Bureau. "Qualifying census tracts" are census tracts identified by CalEnviroScreen, or areas with median household incomes at or below 80 percent 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.

¹ Figures 2-1, 2-2, and 2-3 of the General Plan are available online at egeneralplan.vcrma.org/chapter/land-use-designations-and-standards/.

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Study Area: Unincorporated areas within the Ventura Area of Interest, the Santa Paula Area of Interest, or the Oxnard Area of Interest labeled as mapped in [Figure 2-3 of the General Plan](#).¹ All three Areas of Interest are collectively referred to as the Study Areas.

Executive Summary

According to California Code Section 65040.12, “environmental justice for all people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” California has instituted a series of laws protecting communities from environmental injustices, requiring consideration of the issue in policies, programs, and activities. One such law, enacted under Senate Bill (SB) 535 (2012), requires the California Environmental Protection Agency (CalEPA) to identify disadvantaged communities in order to allocate state funding for these communities. The California Office of Environmental Health Hazard Assessment (OEHHA), an office within CalEPA, has developed the California Communities Environmental Health Screening Tool (CalEnviroScreen), which CalEPA uses to identify disadvantaged communities pursuant to SB 535. CalEnviroScreen has consequently become a screening tool used by many jurisdictions throughout the state. Subsequently, SB 1000, signed into law in 2016, requires that city and county general plans identify disadvantaged communities within the area covered by the general plan. If one or more disadvantaged communities are identified, the general plan shall include either a stand-alone environmental justice element or related goals, policies, and objectives addressing environmental justice integrated in other elements.

The Ventura County 2040 General Plan (General Plan), adopted in September 2020, incorporates environmental justice as a cross-cutting topic, with goals, policies and programs incorporated throughout the General Plan as it relates to each plan element. The General Plan has identified three Designated Disadvantaged Communities (DDCs) within unincorporated Ventura County consistent with SB 1000: the unincorporated communities of Piru, Saticoy, and El Rio/Del Norte. In addition, the General Plan includes Implementation Program LU-Q in the Land Use Element, which requires that the County identify additional unincorporated areas near the cities of Ventura, Oxnard, and Santa Paula that may qualify as DDCs. *The Study of Additional Potential Disadvantaged Community Designations* (the Study) meets the objective of Implementation Program LU-Q.

County Planning Division staff found that identifying additional DDCs using the DDC criteria defined in the General Plan presented challenges related to the physical locations and geographical scale of census tract boundaries and residential areas within Ventura County. Therefore, the Study explores three options to identify additional DDCs within the unincorporated areas of Ventura County. The Study contains six chapters, organized according to the chronological research process undertaken by Planning Division staff.

- Chapter 1 provides the defining context for identifying additional DDCs within Ventura County unincorporated areas.
- Chapters 2 and 3 provide details on the analysis of identifying additional DDCs.
- Chapter 4 describes the first two options to identify DDCs in further detail, including the potential effects of designating disadvantaged communities.
- Chapter 5 summarizes public engagement efforts conducted to gather community input on the first two options described in Chapter 4.
- Chapter 6 describes additional research conducted following public engagement, including an additional option to identify DDCs, which was developed as a result of public input received and additional research.
- References and Appendices provide additional resources referenced throughout the Study.

Study of Additional Potential Disadvantaged Community Designations

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1. Introduction

A major update of the Ventura County General Plan was initiated in 2016. Part of this update included integration of the requirements of Senate Bill (SB) 1000 (2016), codified at Government Code section 65302(h), which requires that counties adopt an environmental justice element, or related goals, policies, and objectives integrated into other elements, that identifies disadvantaged communities within the area covered by the general plan of the county, if the county has a disadvantaged community. The intent of SB 1000 is to implement general plan policies and programs that “address the unique or compounded health and environmental issues that include, but are not limited to, the reduction of pollution exposure, including the improvement of air quality, and the promotion of public facilities, food access, safe and sanitary homes, and physical activity.” (Gov. Code § 65302)

On September 15, 2020, the Board adopted the current 2040 General Plan (General Plan) and certified the General Plan’s Environmental Impact Report, which became effective October 15, 2020. The General Plan includes Implementation Program Q in the Land Use Element (LU-Q), which requires that the County research the southwestern and northwestern Oxnard Planning Area and along the Ventura Avenue in the Ventura Planning Area using the California Communities Environmental Health Screening Tool (CalEnviroScreen) to identify DDCs. In order to implement Program LU-Q, the *Study of Additional Potential Disadvantaged Community Designations* (the Study) was prepared by the Ventura County Planning Division. The Study includes detailed evaluations of potential disadvantaged communities based on CalEnviroScreen data, as well as County data, public comments received during public engagement, and options explored to identify potential disadvantaged communities. This chapter discusses the state legislative background and Program LU-Q, which provides contextual understanding for the development of the Study.

1.1 Senate Bill 535 and CalEPA Designated Census Tracts in Ventura County

The method developed by the state to implement SB 535 is important to understand given the County’s ongoing process to implement SB 535 specifically designed to identify disadvantaged communities for investment of state Cap-and-Trade Program funds (also referred to as the Greenhouse Gas Reduction Fund). These investments are aimed at improving public health, quality of life and economic opportunity in California’s communities, reducing environmental pollution, and at the same time, reducing pollution that causes climate change.

Adopted in 2012, SB 535 established minimum funding requirements from the Greenhouse Gas Reduction Fund to be allocated to disadvantaged communities and tasked the California Environmental Protection Agency (CalEPA) to identify those communities, designation of disadvantaged communities must be based on public health, and environment and California Office of Environmental Health Hazard Assessment (OEHHA), an office within CalEPA, developed CalEnviroScreen to identify census tracts throughout the state that meet the definition a disadvantaged community pursuant to SB 535 and codified in section 39711 of the Health and Safety Code. Since its development in 2013, newer versions of CalEnviroScreen have been released with updated statewide data sets, and it has been used by many jurisdictions to identify disadvantaged communities for other purposes, such as compliance with environmental justice requirements pursuant to SB 1000. Use of CalEnviroScreen in the Study is discussed in further detail in Section 2.1.

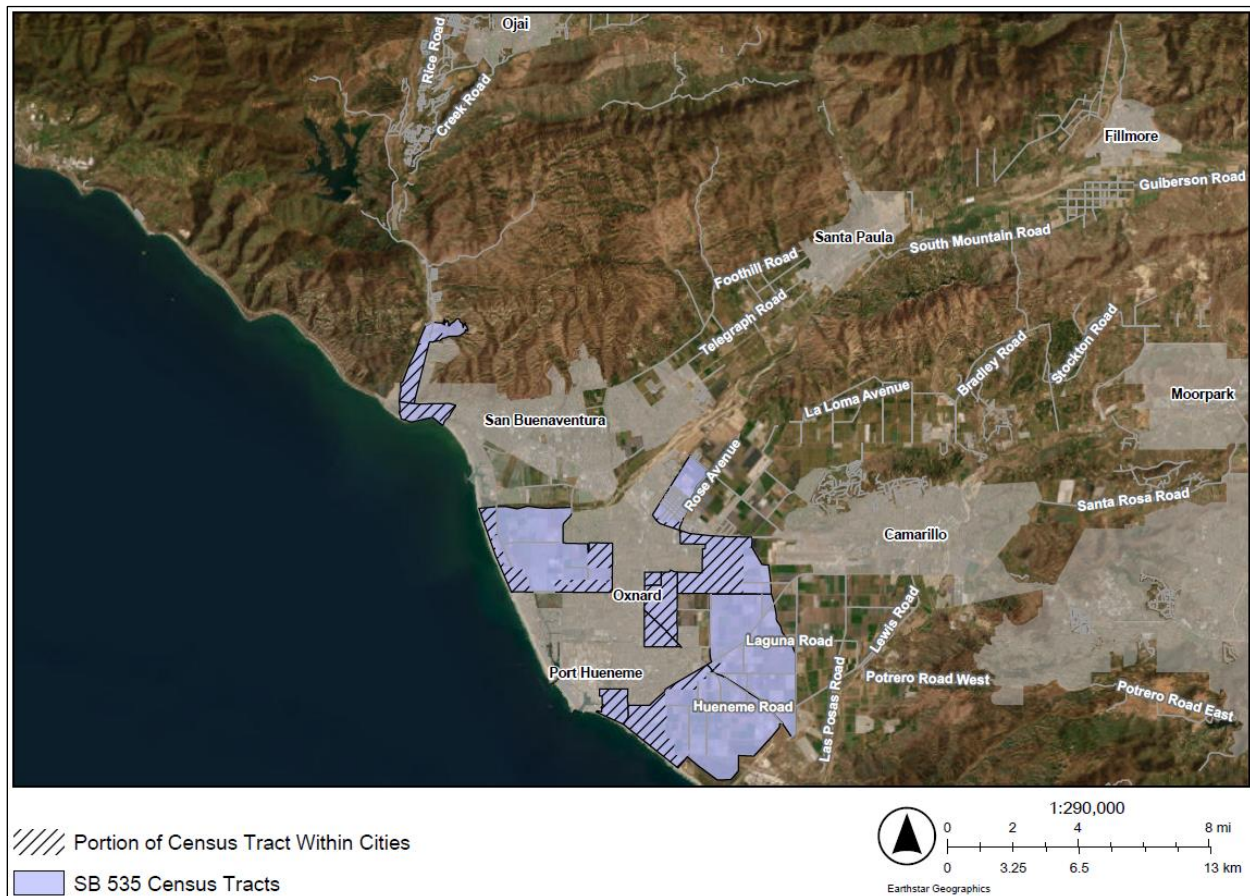
CalEPA has identified several census tracts in Ventura County (including in the cities of Ventura and Oxnard) for purposes of SB 535 based on the criteria below:

Study of Additional Potential Disadvantaged Community Designations

1. Census tracts with overall scores of 75 percent or higher in CalEnviroScreen 4.0.
2. Census tracts without overall scores in CalEnviroScreen 4.0 due to data gaps, but scoring 95 percent or higher in CalEnviroScreen 4.0 for
3. Census tracts designated by CalEPA based on earlier versions of CalEnviroScreen.
4. Lands under the control of federally recognized American Indian Tribes. For purposes of this designation, a Tribe may request a consultation with CalEPA regarding the designation of a particular area of land that is under its control, even if not currently represented as such on CalEPA's map of SB 535

Figure 1 depicts the CalEPA designated SB 535 census tracts in Ventura County.

Figure 1: CalEPA Designated SB 535 Census Tracts



1.2 Senate Bill 1000

SB 1000, codified as Government Code section 65302(h), requires that general plans adopted after January 1, 2018 include an environmental justice element or include goals, policies, and objectives in other element(s) of the general plan to address health risks within disadvantaged communities. Under SB 1000, jurisdictions must work to combat health risks that are disproportionately affecting disadvantaged communities, increase governmental civic engagement with disadvantaged communities, and identify policies and programs that address challenges faced by disadvantaged communities.

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SB 1000 refers to disadvantaged communities as areas identified by CalEPA pursuant to Section 39711 of the Health and Safety Code or low-income areas that are disproportionately affected by pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.

Section 39711 of the Health and Safety Code states in part:

(a) The California Environmental Protection Agency shall identify disadvantaged communities for investment opportunities related to this chapter. These communities shall be identified based on geographic, socioeconomic, public health, and environmental hazard criteria, and may include, but are not limited to, either of the following:

(1) Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation.

(2) Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment.

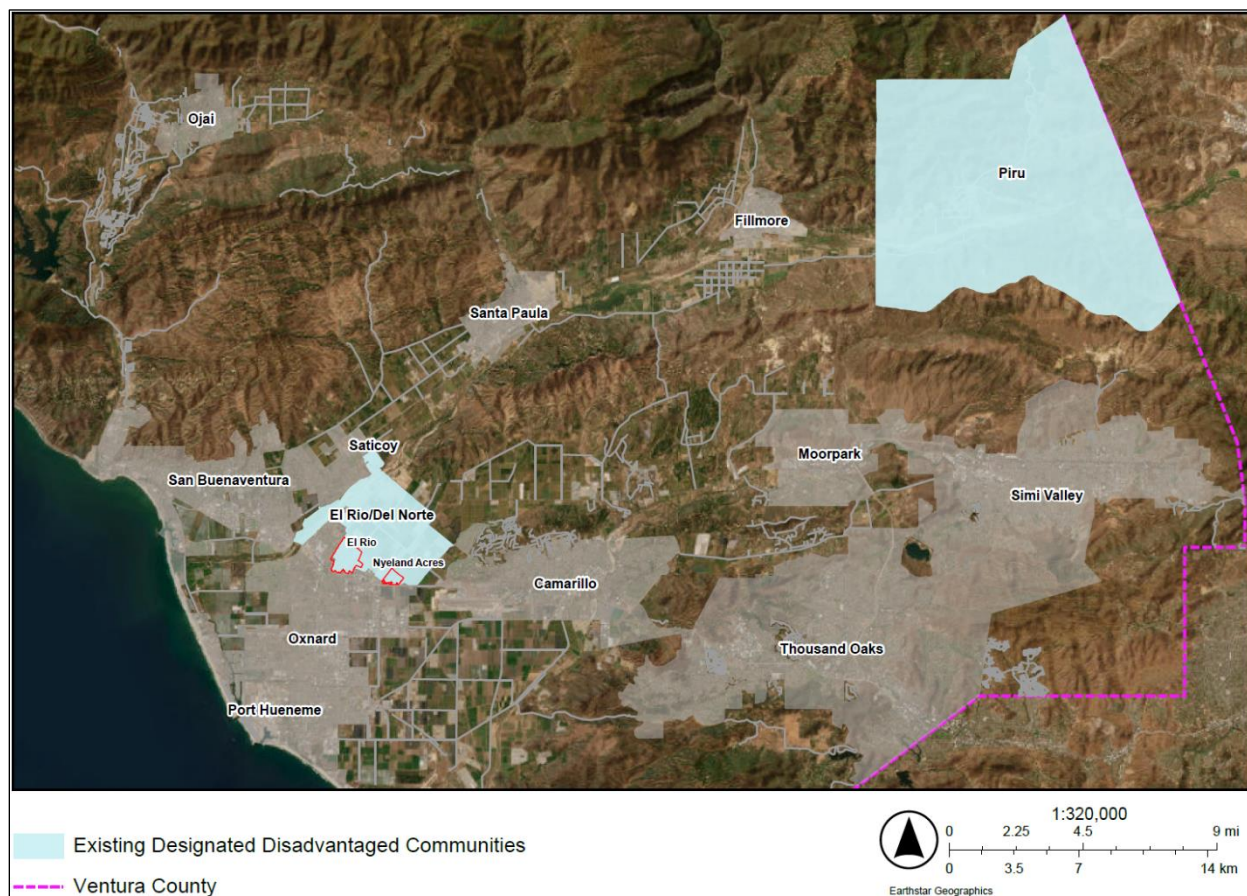
The Governor's Office of Planning and Research (OPR) adopted Government Code section 65040.2 to adopt and periodically revise the State General Plan Guidelines (State Guidelines) for the preparation and content of general plans for all cities and counties in California. The State Guidelines serve as the "how to" resource for developing general plan advisory elements and advisory reports that supplement the State Guidelines to reflect new legislative information or requirements. Section 4.8 of the State Guidelines related to drafting an Environmental Justice Element was last updated in June 2020 to address the identification of disadvantaged communities pursuant to Government Code section 65302(h). This update to the State Guidelines is reflected in the OPR's

Per the State Guidelines, local agencies should broadly analyze possible disproportionate burdens and other hazards that can lead to negative health effects, exposure, or environmental degradation to further the protective intent of Government Code section 65302(h), even when the census tract or area does not meet the definition of a disadvantaged community as defined in Government Code section 65302(h). This may include consideration of individual CalEnviroScreen indicators that can help characterize pollution burden such as air pollutants, pesticides, water and groundwater pollutants, hazardous waste, solid waste sites and facilities, and others; localized data or unique community issues that may have been missed in larger statewide data sets; and community input. Such community input was particularly impactful in this study in the identification of boundaries for disadvantaged communities (see Chapter 6, Development of Option 3).

1.3 Existing Designated Disadvantaged Communities in the General Plan

The areas of Saticoy, El Rio/Del Norte, and Piru are identified as DDCs in the General Plan. The boundaries of the Saticoy, El Rio/Del Norte, and Piru DDCs are coterminous with the respective boundaries of the Saticoy, El Rio/Del Norte, and Piru Area Plans. During the comprehensive General Plan Update project from 2016 to 2020, the Area Plan boundaries were determined to be an appropriate land use planning boundary from which to identify DDCs in these particular areas because the boundaries encompass unincorporated communities that could benefit from General Plan policies and programs intended to help address environmental pollution burdens and socioeconomic disparities in disadvantaged communities. Figure 2 shows the existing DDCs as identified in the General Plan.

Figure 2. Existing Designated Disadvantaged Communities



1.4 General Plan Implementation Program LU-Q

The General Plan includes a Land Use Element that incorporates Implementation Program LU-Q, which requires the County of Ventura to study additional areas for potential inclusion as DDCs consistent with SB 1000. Implementation Program LU-Q states:

Within one-year of 2040 General Plan adoption, the County shall research the southwestern and northwestern Oxnard Planning Area and along the Ventura Avenue in the Ventura Planning Area using Cal EPA CalEnviroScreen to identify Designated Disadvantaged Communities (DDCs). Upon identification of DDCs, the General Plan maps and list of low income and disadvantaged communities in the General Plan will be updated. In addition, the Background Report will be updated to reflect the existing conditions and description of these DDCs.

Implementation Program LU-Q requires extensive research and analysis using CalEnviroScreen and income data to identify DDCs. CalEnviroScreen aggregates its data based on census tracts as defined by the United States (US) Census Bureau. Thus, to conduct the Study, qualifying census tracts that meet the criteria of a DDC (see Key Terms and Definitions) were identified to evaluate areas for potential designation. However, the Planning Division found that the potential designation of qualifying census tracts were both over- and under-inclusive, leaving some neighborhoods outside of its scope, while including large swaths of sparsely populated open space or agricultural lands.

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To address these limitations, two options were initially explored. Option 1 applies the County Area Plan boundary (or Area of Interest boundary where no Area Plan boundary is available) to identify potential disadvantaged communities. Option 2 applies Existing Community boundaries as identified in the General Plan if the Existing Community contains residential land uses. Staff conducted public engagement on these two options, which led to the need for additional research on the methodology to identify disadvantaged communities, taking into consideration potentially disadvantaged areas identified through community input and policy implications on any potential designations. As a result of this effort, a third option (Option 3) was developed that focuses on residential areas and schools, taking into consideration how DDC policies in the General Plan could be applied to these areas.

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2. Project Parameters

Program LU-Q requires the County to evaluate the Ventura and Oxnard Study Areas to identify potential disadvantaged communities. However, CalEnviroScreen scores and median household income levels of the census tracts in the unincorporated areas near the City of Santa Paula indicate that these census tracts could potentially be identified as disadvantaged communities, in addition to those areas expressly identified in Program LU-Q. Therefore, the census tracts in the unincorporated areas near the City of Santa Paula were included as part of the Study conducted pursuant to Program LU-Q.

2.1 CalEnviroScreen

CalEnviroScreen incorporates 13 indicators related to pollution burden and 8 indicators that track population characteristics and other vulnerabilities of each census tract within California. It is important to note that CalEnviroScreen does not confirm actual exposure to, or the presence of, environmental pollution or contaminants in a given census tract. The information compiled and evaluated by CalEnviroScreen indicates the level of potential risk of human exposures to environmental pollutants. CalEnviroScreen assigns each census tract percentile scores for each of its 21 indicators¹, as well as percentile scores for overall pollution burden, overall population characteristics, and an overall percentile score that combines both these categories. The scores allow for comparisons of all the census tracts in the state. In keeping with CalEnviroScreen's use of the term "score," CalEnviroScreen percentile scores are referred to as scores. Further details about CalEnviroScreen are explained in Section 3.1.1, Scoring Methodology.

CalEnviroScreen also provides race/ethnicity information, as well as the age distribution of the population within each census tract throughout the state based on data provided by the 2015-2019 American Community Survey (ACS) from the US Census Bureau. Race/ethnicity information taken from the Census Bureau are classified as follows in CalEnviroScreen:

- African American: respondents who identified as a single race and as Black or African American.
- Asian American: respondents who identified as a single race and Asian; single race and Native Hawaiian; and Other Pacific Islander or Pacific Islander.
- Hispanic: respondents who identified as Hispanic or Latino.
- Native American: respondents who identified as a single race and American Indian and Alaska Native.
- Other: respondents who identified as "other" or "two or more races."
- White: respondents who identified as a single race and White.

CalEnviroScreen version 3.0 was used during the 2016-2020 period to identify DDCs. Version 4.0 was released in October 2021 and is used in this Study.

2.2 Income Data

CalEnviroScreen 4.0 uses 2010 census tract boundaries and has not yet updated its data to align with 2020 census tract boundaries. The most recent income data that aligns with the 2010 census

¹ Detailed information about each CalEnviroScreen indicator is available online at oehha.ca.gov/calenviroscreen/indicators and in the CalEnviroScreen 4.0 Report at oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf.

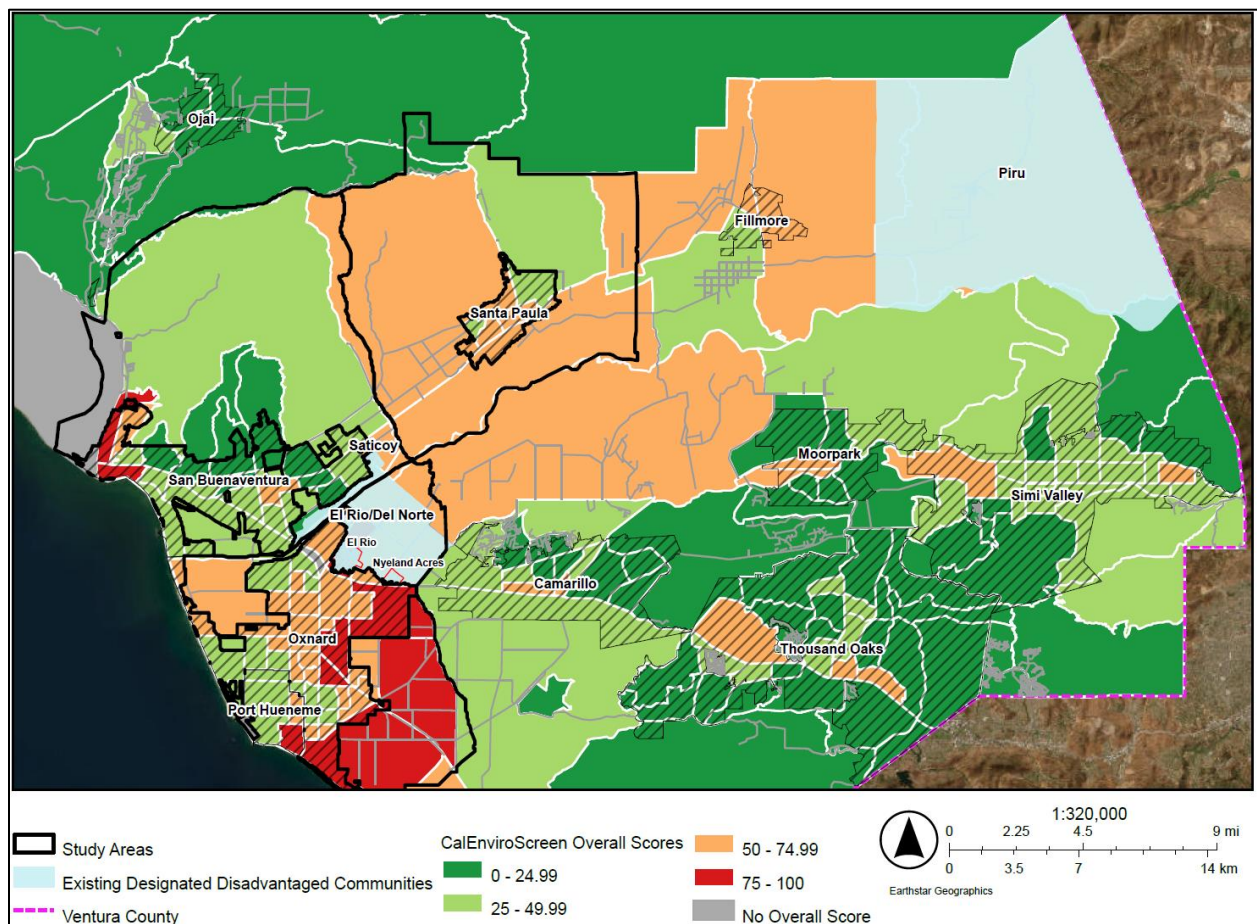
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tract boundaries is from year 2019. Thus, for purposes of this Study, income levels of census tracts were determined based on year 2019 data of median household income from the US Census Bureau and the 2019 lists of state median income limits from the California Department of Housing and Community Development (HCD). Staff compared the mean median household income of each census tract studied to 80 percent of the statewide median income set by HCD.

2.3 Study Areas and Census Tracts Evaluated

Implementation Program LU-Q specifically referenced Planning Areas as described in Section 1.4 and defined in the Key Terms and Definitions. The areas evaluated in this Study consist of the Ventura Planning Area, Oxnard Planning Area, and the Santa Paula Planning Area. For the purposes of this analysis, Planning Areas will hereafter be referred to as Study Areas to minimize confusion with other land use planning terms (refer to the Key Terms and Definitions). Cities within each Study Area are excluded from evaluation as the County does not have jurisdictional authority over land use policies within cities. Figure 3 shows the Study Areas and the census tracts that are located entirely or partially within the Study Areas.

Figure 3. Overview of Study Areas and Census Tracts



After reviewing census tracts that are located within the Study Areas as shown in Figure 3, qualifying census tracts that have scores of 75 or above in CalEnviroScreen, or that are considered low-income were further identified within each Study Area as shown in Figure 4 and summarized in Table 1. Refer to Chapter 3 (Data Evaluation) for how CalEnviroScreen data and

Study of Additional Potential Disadvantaged Community Designations

income data were analyzed for this study. Refer to Appendix A for a summary of all the census tracts within each Study Area, their respective CalEnviroScreen scores, and low-income status.

Figure 4. Qualifying Census Tracts within the Study Areas

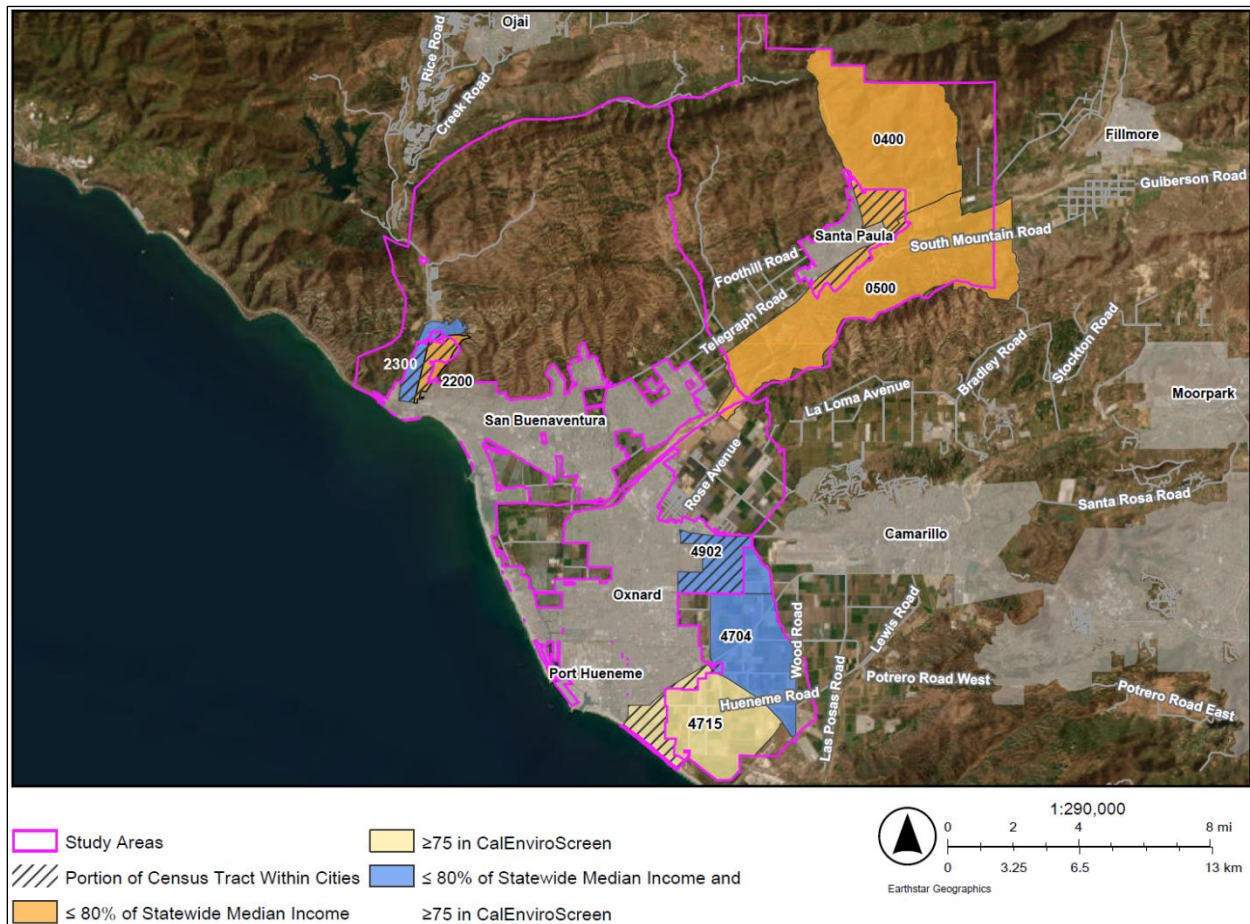


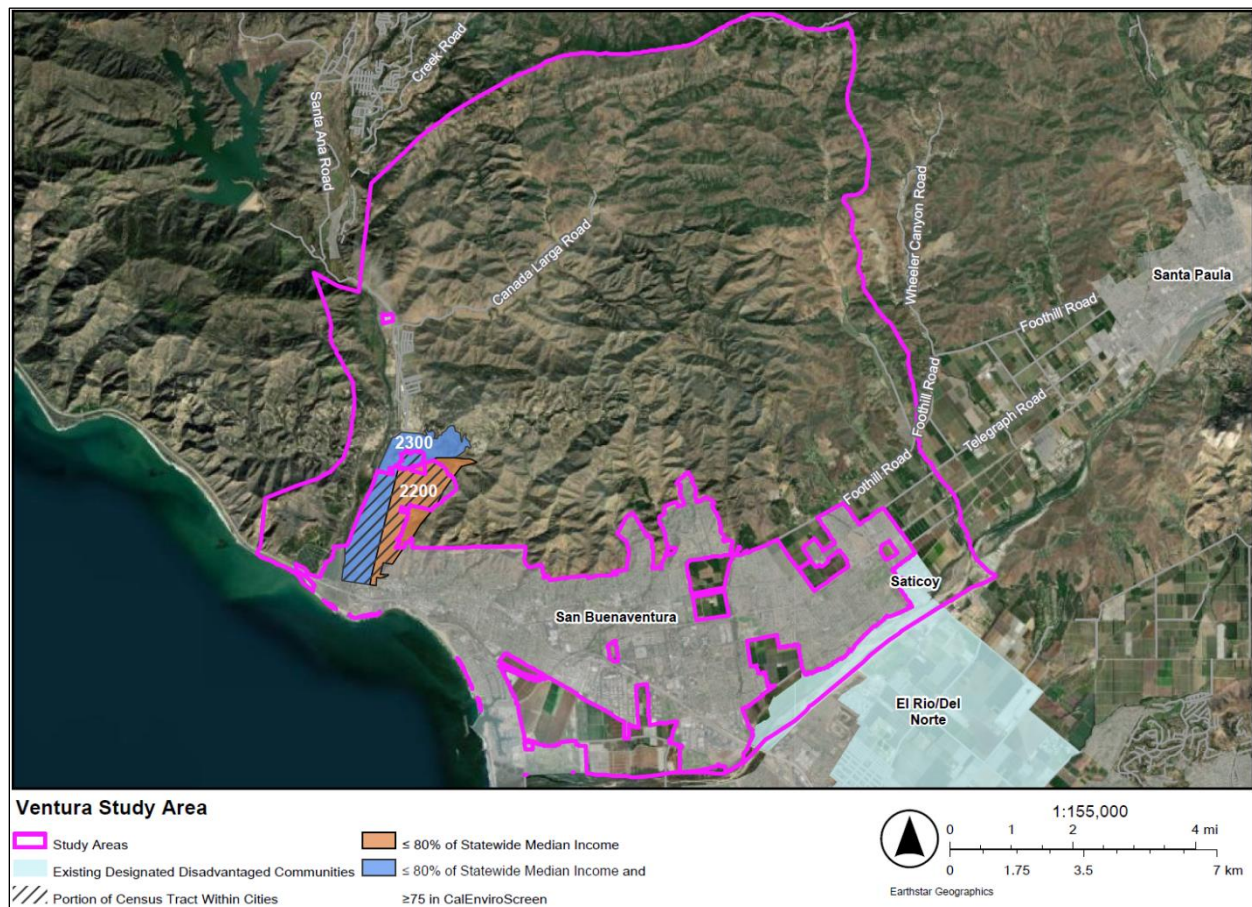
Table 1. Census Tracts that Meet the Existing General Plan Definition of a DDC

Census Tract	CalEnviroScreen 4.0 Overall Scores	80% At or Below Statewide Median Income
Ventura Study Area		
2300	82.90	Yes
2200	60.05	Yes
Oxnard Study Area		
4704	76.03	Yes
4715	85.70	No
4902	91.75	Yes
Santa Paula Study Area		
0400	49.79	Yes
0500	74.94	Yes

2.3.1 Ventura Study Area

Figure 5 shows the qualifying census tracts within the Ventura Study Area. General Plan land use designations are shown in Figure 6. The majority of residential areas within census tracts 2300 and 2200 are located within the City of Ventura (see race/ethnicity data in Table 2). Unincorporated residential areas are located along North Ventura Avenue north of census tract 2300. Portions of industrial uses are located within and adjacent to census tract 2300.

Figure 5. Ventura Study Area



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Figure 6. General Plan Designated Land Uses in Ventura Study Area

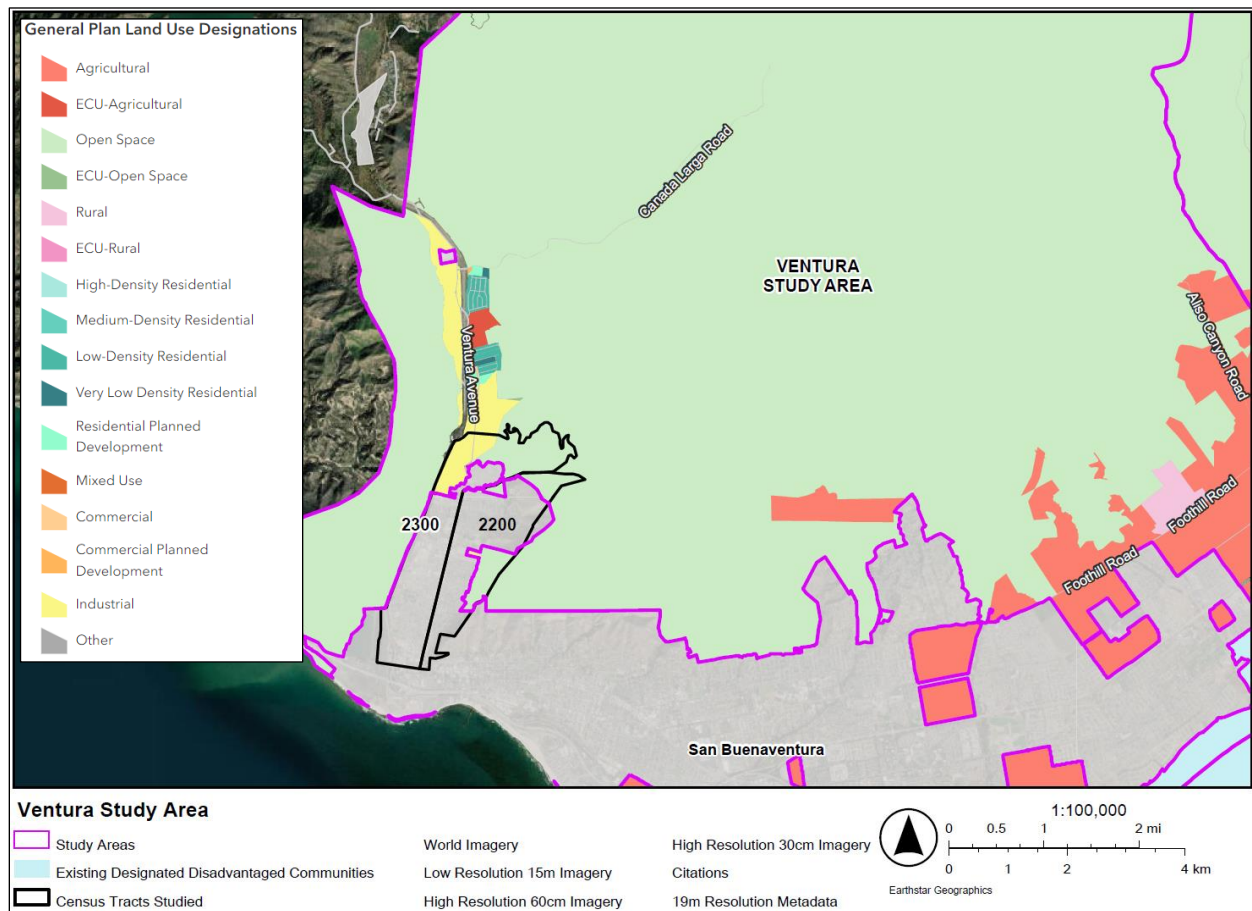


Table 2. Race/Ethnicity of Qualifying Census Tracts within the Ventura Study Area

Census Tract	Population Total ¹	Race/Ethnicity ² (percent of total population)						Age (percent of total population)		
		African American	Asian American	Hispanic	Native American	Other	White	Children (<10)	Between 10 and 64	Elderly (65+)
2300	6,534	0.41	0.44	75.11	0.26	1.10	22.67	12.17	82.25	5.59
2200	6,350	0.52	0.90	68.08	0.55	0.22	29.73	17.21	72.44	10.35

¹Total population includes unincorporated county areas as well as areas within incorporated cities.

²See Section 2.1 for a description of race/ethnicity groups.

2.3.2 Santa Paula Study Area Overview

As shown in Figure 7, two census tracts meet the existing General Plan definition of a DDC within the Santa Paula Study Area. Unincorporated agricultural and open space lands make up large portions of these census tracts as well as the Study Area (see Figure 8). Although less than two percent of the unincorporated land area within the Santa Paula Study Area contains unincorporated residential designated land uses, rural homes and communities are sparsely

Study of Additional Potential Disadvantaged Community Designations

located throughout the unincorporated agricultural and open space lands in the Santa Paula Study Area (see race/ethnicity data in Table 3).

Figure 7. Santa Paula Study Area

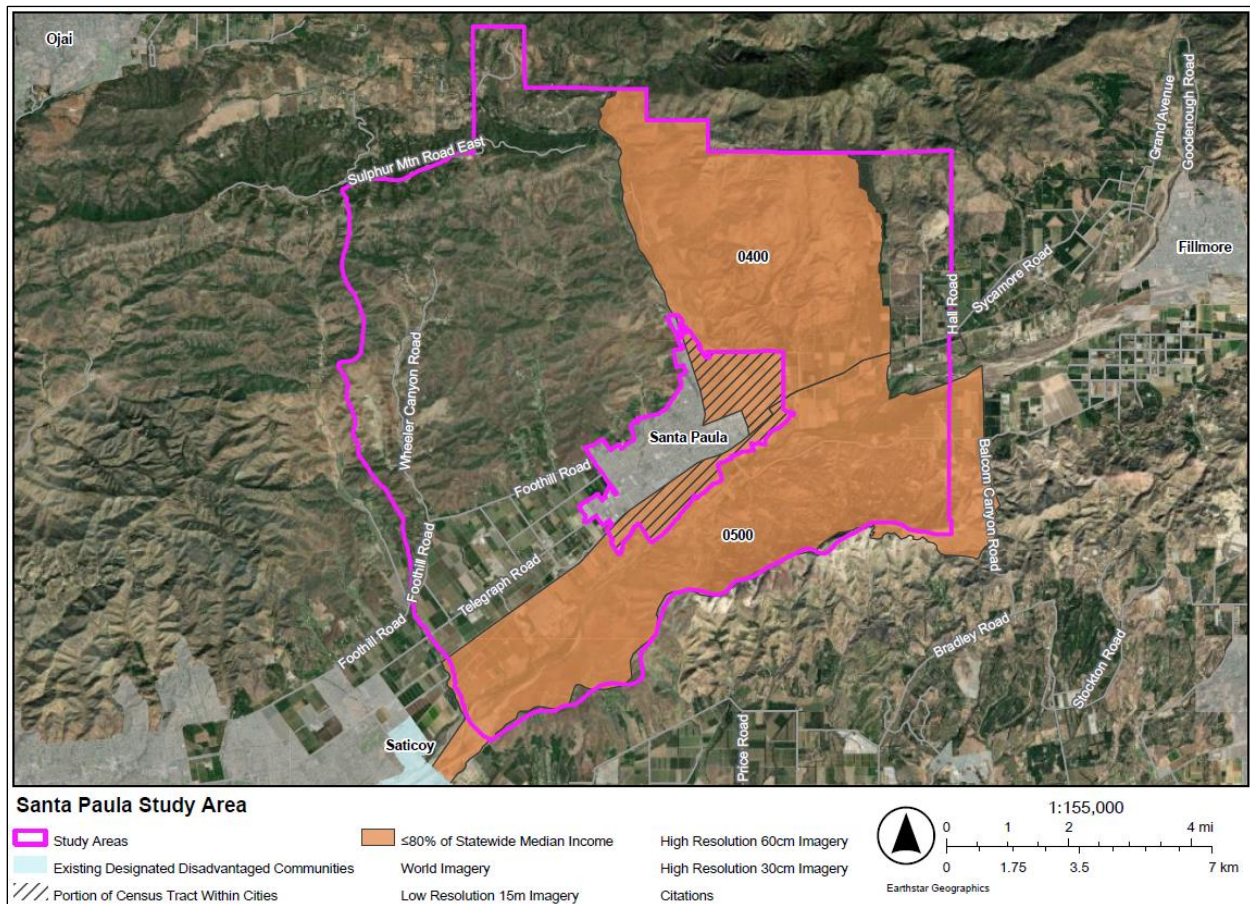


Figure 8. General Plan Designated Land Uses in Santa Paula Study Area

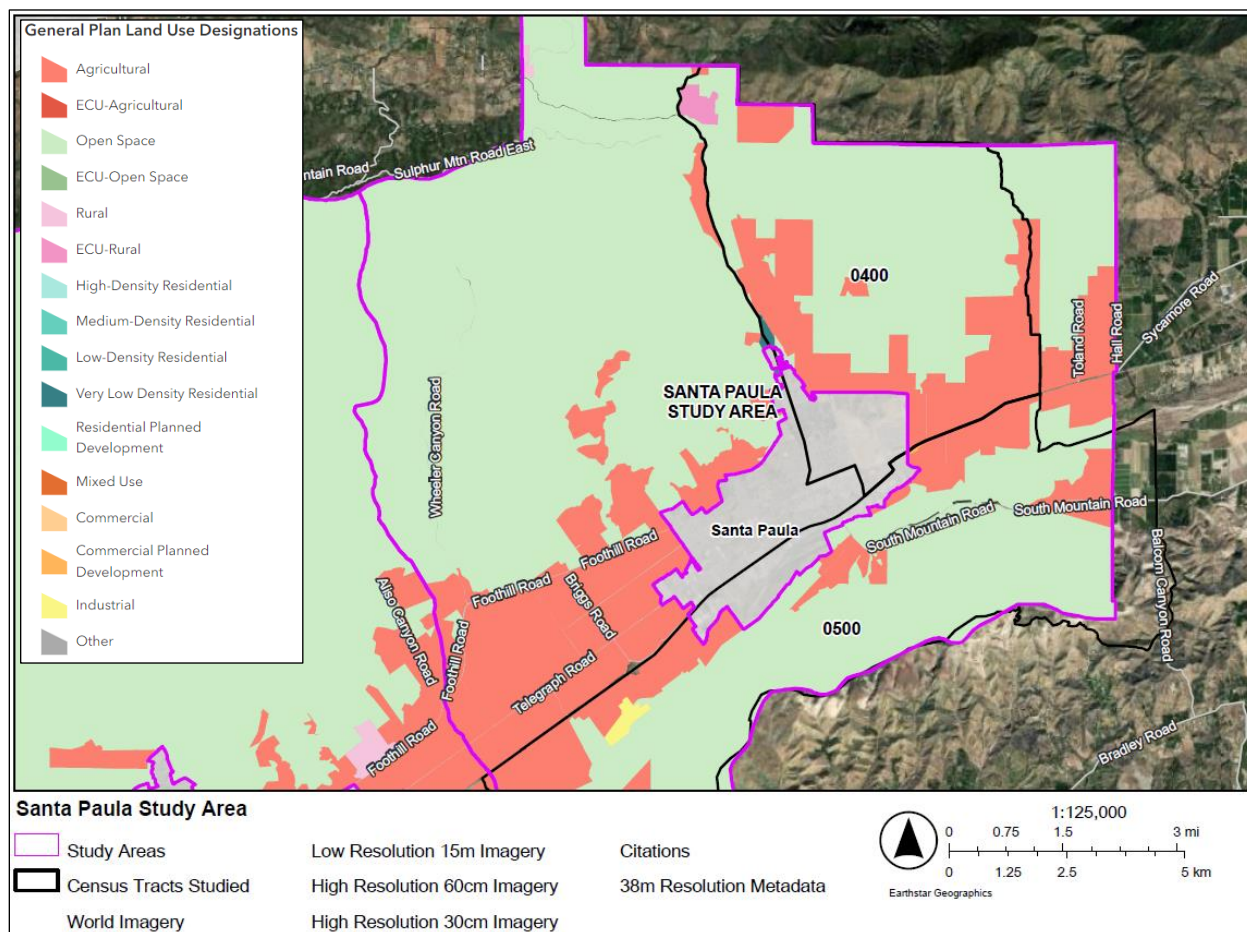


Table 3. Race/Ethnicity of Qualifying Census Tracts within the Santa Paula Study Area

Census Tract	Population Total ¹	Race/Ethnicity ² (percent of total population)						Age (percent of total population)		
		African American	Asian American	Hispanic	Native American	Other	White	Children (<10)	Between 10 and 64	Elderly (65+)
0400	6,021	0.28	1.16	76.73	0.08	0.75	21.0	11.61	74.57	13.82
0500	1,697	NR	1.41	59.16	NR	0.18	39.25	13.26	63.94	22.80

NR = None reported; no respondent identified with the listed race/ethnicity.

¹Total population includes unincorporated county areas as well as areas within incorporated cities.

²See Section 2.1 for a description of race/ethnicity groups.

2.3.3 Oxnard Study Area Overview

Three census tracts evaluated within the Oxnard Study Area meet the existing General Plan definition of a DDC as shown in Figure 9. These census tracts contain city-incorporated land, as well as unincorporated agricultural and open space and do not contain unincorporated residential land uses (see Figure 10). Race/ethnicity data are shown in Table 4.

Figure 9. Oxnard Study Area

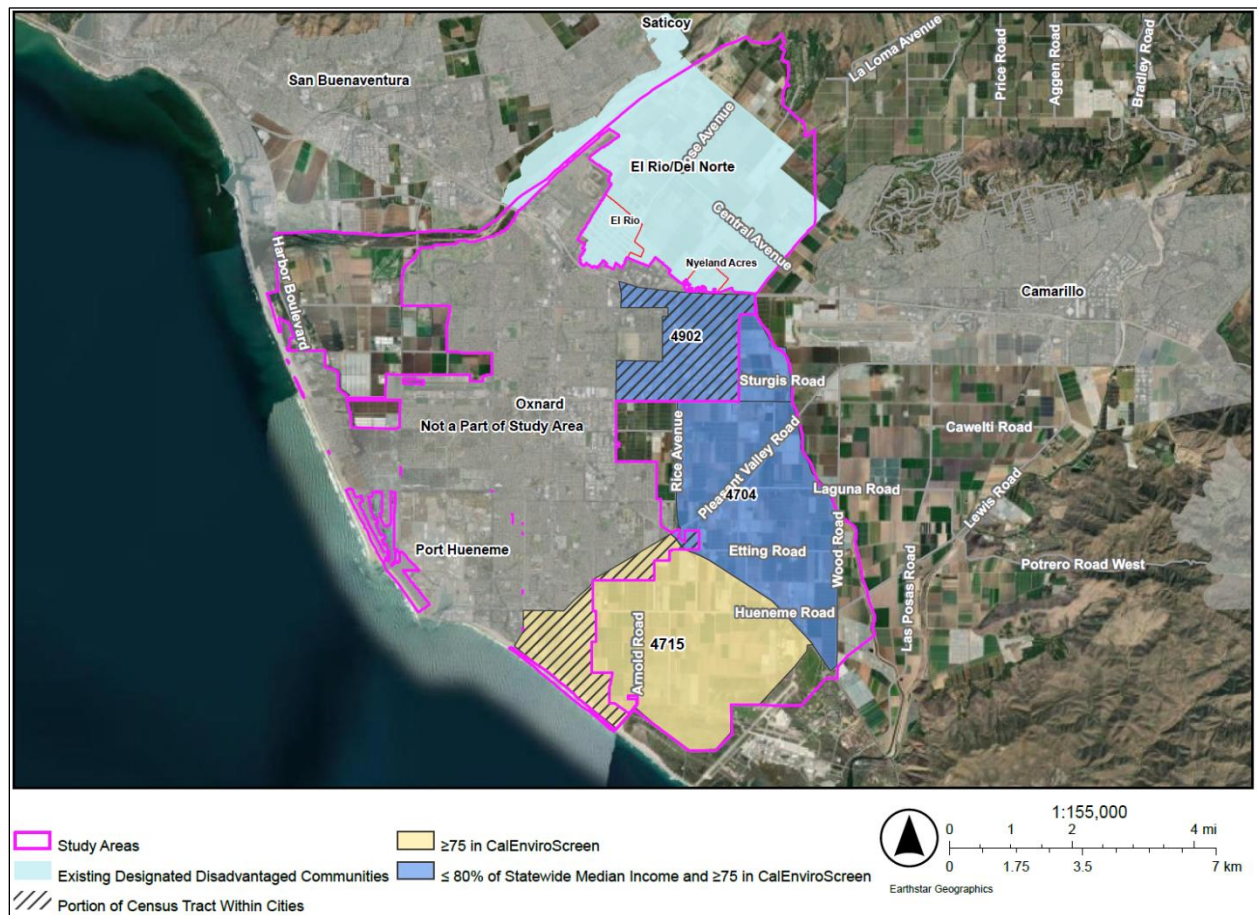


Figure 10. General Plan Designated Land Uses in Oxnard Study Area

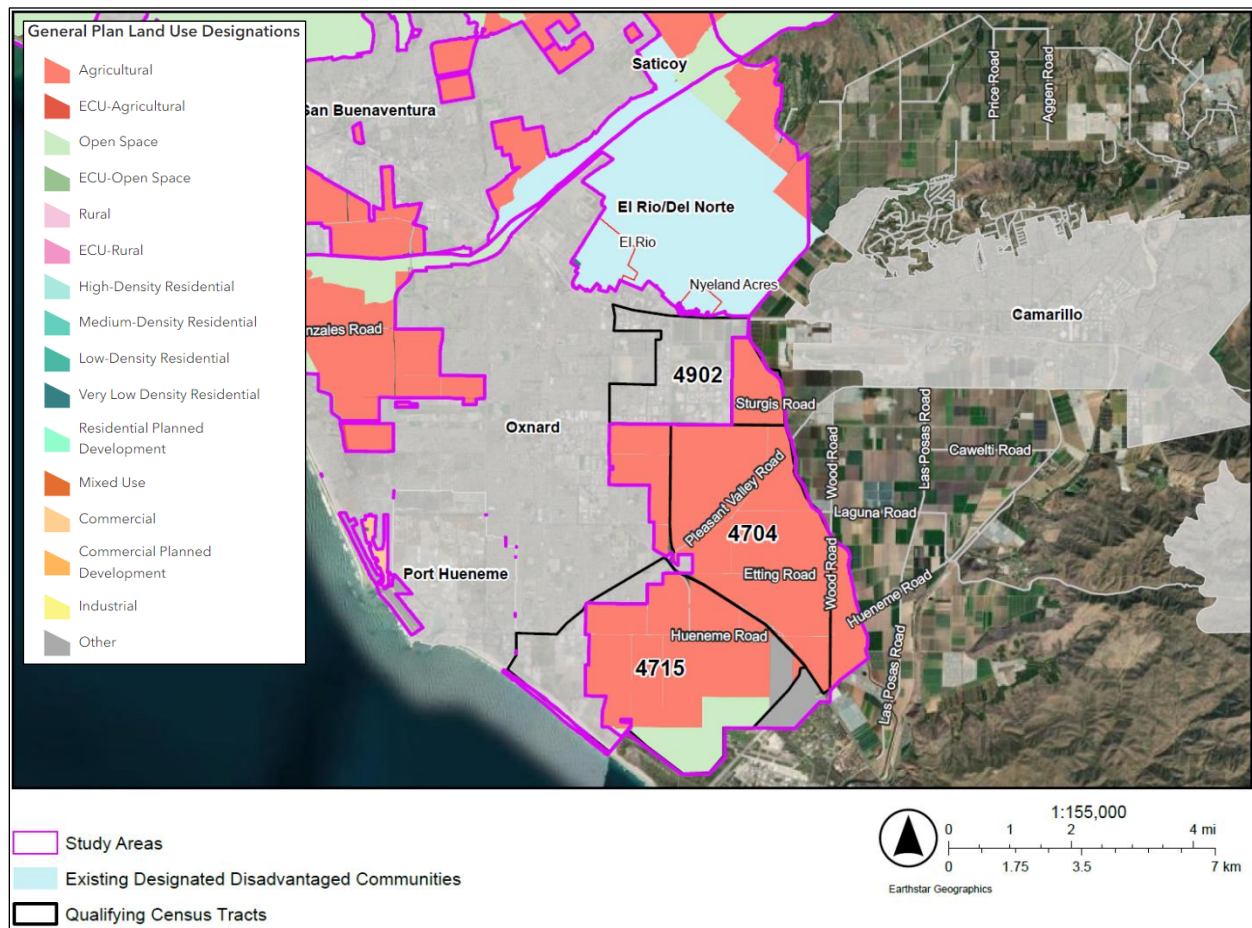


Table 4. Race/Ethnicity of Qualifying Census Tracts within the Oxnard Study Area

Census Tract	Population Total ¹	Race/Ethnicity ² (percent of total population)						Age (percent of total population)		
		African American	Asian American	Hispanic	Native American	Other	White	Children (<10)	Between 10 and 64	Elderly (65+)
4704	1,372	3.50	2.92	71.50	NR	5.17	16.91	13.41	74.64	11.95
4715	5,417	2.66	9.03	77.28	0.14	1.83	9.06	12.07	78.20	9.73
4902	5,072	NR	0.24	97.91	NR	NR	1.85	14.98	72.71	12.30

NR = None reported; no respondent identified with the listed race/ethnicity.

¹Total population includes unincorporated county areas as well as areas within incorporated cities.

²See Section 2.1 for a description of race/ethnicity groups.

2.4 Potential Effects of Designating Disadvantaged Communities

There are several potential effects resulting from designating an area as a disadvantaged community. Some of these derive from policies and programs in the General Plan specifically

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focused on DDCs, and others are related to the potential to receive grants specifically geared for DDCs.

2.4.1 General Plan Policies and Programs

The General Plan includes 42 goals, policies, and programs that specifically focus on DDCs as summarized by topic in Table 5 below and outlined in Appendix B. As required by SB 1000, these General Plan policies and programs specifically focus on increasing governmental support and resources for DDCs in several ways.

Table 5. DDC Goals, Policies, and Programs in the General Plan

Topic	Description	Total Count
Siting & Development	Siting and development of future projects within designated disadvantaged communities.	15
Noticing & Outreach	Noticing and educational and outreach within designated disadvantaged communities.	8
Services & Infrastructure Investment	Development or enhancement of County-provided public services and infrastructure within designated disadvantaged communities.	17
Coordination & Collaboration	Coordination and collaboration efforts between the County and other public entities, private entities, the public, and other stakeholders to increase equity and consider the needs of designated disadvantaged communities.	20
Planning & Policymaking	Development of plans and policies with a focus on designated disadvantaged communities.	14

In addition, General Plan Implementation Program COS-CC requires the County's Climate Emergency Council to include a resident from each DDC in its membership. The Climate Emergency Council currently consists of five members from each supervisorial district, three members from the Saticoy, El Rio/Del Norte, and Piru DDCs, and two at-large members. Additional DDCs identified by the Board would result in additional council members on the Climate Emergency Council.

General Plan policies and programs associated with DDCs are newly adopted and were not previously included in the County's General Plan prior to September 2021, and programs are in their early stages of implementation. Table 6 below summarizes how these policies and programs are anticipated to be implemented. The table is not an exhaustive illustration of how these policies and programs may be implemented, and a case-by-case approach may be necessary to evaluate specific environmental and health effects of projects developed within or near DDCs.

Table 6. Potential Implementation Strategies of DDC Policies and Programs

Category	Potential Implementation Strategies
Siting & Development	<ul style="list-style-type: none">Consider a tiered approach in which more protective measures are applied to communities closer to the project.Consider prioritizing funding for communities that may be disproportionately impacted by environmental pollution as a result of the project.

Study of Additional Potential Disadvantaged Community Designations

Category	Potential Implementation Strategies
	<ul style="list-style-type: none"> Consider a buffer or setback distance from disadvantaged communities when siting projects and evaluating project impacts.
Noticing & Outreach	<ul style="list-style-type: none"> Consider holding meetings, workshops, and other public engagement opportunities at times and locations that make it convenient for community members to attend. Consider engagement techniques that make it convenient, accessible, and easy to understand to promote participation from community members. Consider multiple avenues of communication to reach as many community members as feasible, including but not limited to, translation and interpretation services, digital media, print media, and radio. Consider coordination with community-based organizations in the early stages of project development. Consider partnership and collaboration opportunities with community-based organizations, such as partnership-based grant programs; community-wide communication channels such as mobile texting and social media; coordinating or participating in communitywide events.
Coordination & Collaboration	
Planning & Policymaking	
Services & Infrastructure Investment	<ul style="list-style-type: none"> Consider grant opportunities that are especially focused on addressing the needs of disadvantaged communities. Consider prioritizing disadvantaged communities when County funding is available for improvements to public services and infrastructure. Consider coordinating with community-based organizations on public outreach and education programs regarding stewardship of public resources such as, but not limited to, parks, beaches, public health, and public safety.

In light of the above considerations, additional specialized analysis may be considered for future development in a DDC (e.g., health assessment study and report) which could increase development costs, require modifications to land use operations subject to County permits to address impacts on a DDC, or result in the denial of a permit if a project is deemed inconsistent with the General Plan DDC policies. In addition, both applicants of privately initiated development projects and County agencies implementing programs and services may need to conduct additional meetings, workshops, public engagement, and notifications within DDCs, which may impact project budgets and schedules.

In order to minimize environmental pollution impacts on a disadvantaged community resulting from a nearby discretionary project, a setback from disadvantaged communities could be considered when siting projects and evaluating project impacts. While developing an implementation setback tool is outside the scope of this Study, the Planning Division has been preliminarily considering tools and methods that could be appropriate to the County to evaluate setbacks. Buffering a discretionary project a certain distance from the boundary of a DDC would provide greater clarity to development applicants, County staff, and community members as to where General Plan DDC policies would be applied than if no distance was identified. For example, General Plan DDC policies, especially those related to Siting & Development and Noticing & Outreach, would be more meaningful when applied to discretionary projects located in close proximity to an identified DDC than those located significantly further away.

In preliminary research of DDC policy implementation efforts from other jurisdictions, and in discussion with OPR, no examples have been found thus far for applying setbacks, buffer areas, or other best practices for addressing development review within or adjacent to a DDC.

2.4.2 Grant Funding

The County's identification of a DDC may help improve the likelihood that projects that are intended to benefit or enhance the DDC, such as public infrastructure improvement projects or climate adaptation and resiliency projects, as well as improving the likelihood such projects will be prioritized when funds are available. Grant funding opportunities may be available to local government agencies, tribal governments, businesses, farmers, nonprofits, and individuals depending on the source of funding and legislative objectives of the grant program. Grant and priority funding opportunities are dependent on funding availability.

An example of a grant-funded project that prioritizes disadvantaged communities is WaterTalks, a public program funded by the state Department of Water Resources designed to generate and increase community involvement in planning a sustainable water future for California. The Watersheds Coalition of Ventura County leads the program for areas within Ventura County, which has completed a Needs Assessment Report and is currently accepting requests for proposals for water-related projects that would benefit disadvantaged communities, such as producing multi-language educational materials and water quality assessments.

3. CalEnviroScreen 4.0 Data Evaluation

The State Guidelines recommend that local government agencies broadly analyze possible disproportionate pollution burdens to further the protective intent of Government Code section 65302(h) (see Section 1.2). CalEnviroScreen provides extensive statewide data sets that can help to characterize pollution burden. In addition, localized data such as those from county departments, water districts, air districts, local agency formation commissions, and metropolitan planning organizations may be more granular or specific than larger statewide data sets. If this additional, localized data is available, it may be used to inform evaluation of potential disproportionate burdens that may have been missed in larger statewide data sets. Thus, the Planning Division analyzed data of individual indicators compiled in CalEnviroScreen 4.0, income data, as well as County data where available, in order to determine the potential level of disproportionate pollution burdens within each Study Area. The following sections provide further information on the data researched in this Study.

3.1 CalEnviroScreen 4.0 Indicators and Scores

For each census tract in the state, CalEnviroScreen assigns scores to each indicator listed in Table 7 below, which are then calculated as outlined in Figure 11 to determine an overall score. As discussed in Section 2.1, the data compiled in CalEnviroScreen is not an assessment of the *presence* of pollutants in a given area. The scores indicate the *potential risk* of human exposure to pollutants. Scores range from zero to 100 according to the potential risk of exposure to the identified indicator. Higher scores correspond to a higher potential risk of exposure compared to other census tracts across the state. For example, if a census tract has a score of 75, it means that it scored higher than 75 percent of all other census tracts in the state. CalEPA identifies disadvantaged communities as those census tracts in the highest 25 percent (also referred to as scores at or above 75) among other criteria as explained in Section 1.1.

Table 7. Indicators Used in CalEnviroScreen 4.0

Pollution Burdens		Population Characteristics	
Exposure Indicators	Environmental Effects	Sensitive Population Indicators	Socioeconomic Factor Indicators
Children's from Housing	Cleanup Sites	Asthma Emergency Department Visits	Educational Attainment
Diesel PM Emissions*	Groundwater Threats	Cardiovascular Disease	Housing-Burdened Low-Income Households
Drinking Water Contaminants	Hazardous Waste	Low Birth-Weight Infants	Linguistic Isolation
Ozone Concentrations	Impaired Water Bodies		Poverty
Pesticide Use	Solid Waste Sites and Facilities		Unemployment
PM 2.5 Concentrations*			
Toxic Releases from Facilities			
Traffic Impacts			

* "PM" Particulate Matter and refers to tiny particles in the air;

Figure 11. CalEnviroScreen Overall Score Calculation

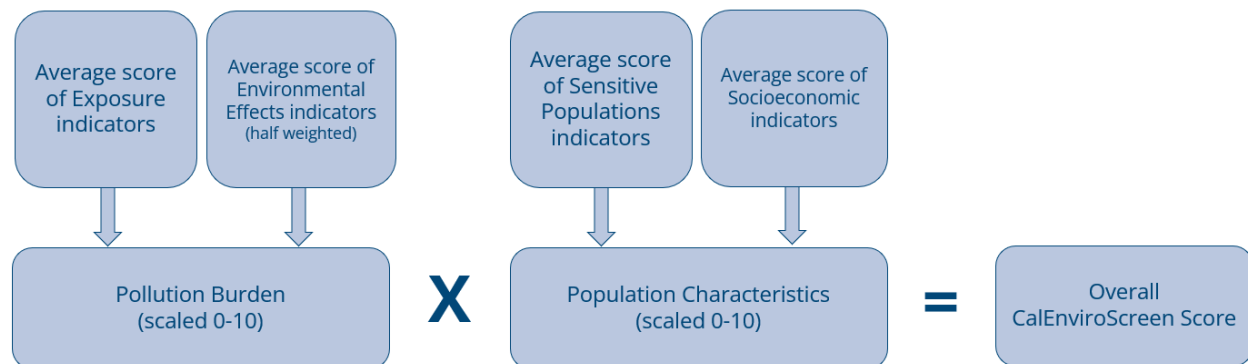
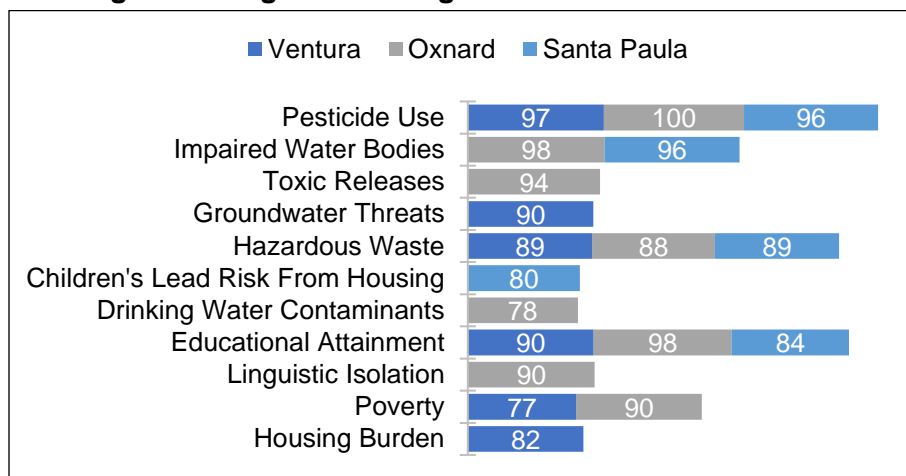


Figure 12 below shows the highest scoring CalEnviroScreen indicators in each Study Area. These scores are identified among the census tracts that meet the existing General Plan definition of a DDC.

Figure 12. Highest Scoring CalEnviroScreen Indicators



CalEnviroScreen categorizes its indicators into two broad categories as outlined in Table 2: Pollution Burdens and Population Characteristics. Brief descriptions of the Pollution Burden indicators and Population Characteristics indicators with the highest scores in the Study Areas are provided in the following sections. To learn more about the many criteria and data sources analyzed for all indicators used by CalEnviroScreen, refer to the CalEnviroScreen 4.0 Report. OEHHA also provides an online interactive CalEnviroScreen 4.0 Indicator Maps tool, which can be used to explore each indicator separately. A brief description of the each indicator is also provided in the Indicator Maps tool. The CalEnviroScreen 4.0 Report and the Indicator Maps can be found online at www.oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.

In consideration of the highest scoring CalEnviroScreen Pollution Burdens indicators, local county information was reviewed, which includes information from the Environmental Health Division (EHD). Overall, local county information supports the information compiled by CalEnviroScreen. Summaries of local county information are provided where available in the following discussions on the highest scoring CalEnviroScreen indicators.

3.2 Pollution Burdens

Pollution Burdens are based on Exposure indicators and Environmental Effects indicators as denoted in Table 2. Each indicator is assigned a score from zero to 100, which indicates the potential risk for exposure to each indicator as compared among all census tracts in California. Brief descriptions of the Pollution Burden indicators with the highest scores in the Study Areas are provided in the following sections.

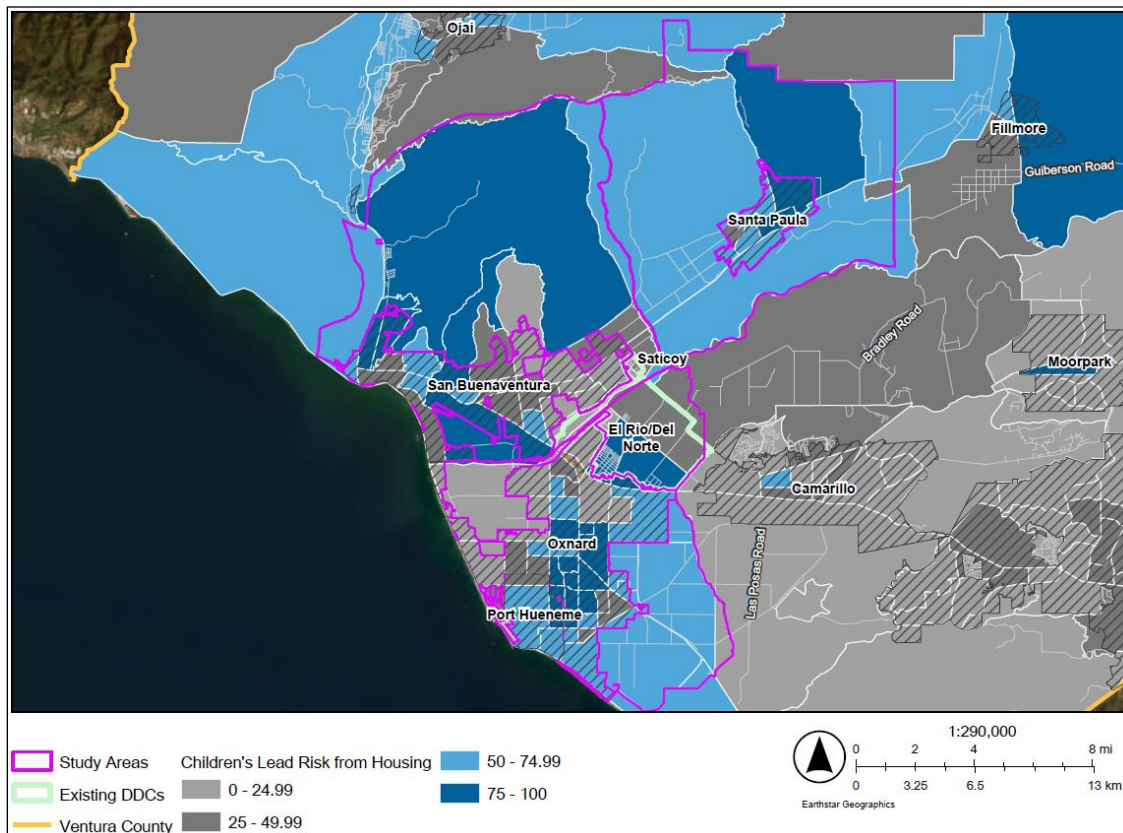
3.2.1 Children's Lead Risk from Housing

CalEnviroScreen Information

Lead is a toxic heavy metal that occurs naturally in the environment. Historically, lead has been used in house paint, plumbing, and as a gasoline additive. While lead levels have declined over the past five decades in the United States, it persists in older housing.

The Children's Lead indicator in CalEnviroScreen is determined based on the age of housing, (which indicates the potential presence of lead-based paint), the percentage of households deemed low income (defined as less than 80 percent of the median household income in the county), and the presence of children under six years old. Children are at greatest risk of negative effects from lead exposure due to their early brain development stage and their potential for lead absorption. Blood testing for lead levels is not conducted for all children in California and thus, was not included as a calculated factor in CalEnviroScreen. Analysis for lead exposure based on housing and income levels encapsulates two of the major risk factors for lead exposure. Figure 13 below shows the scoring range of the Children's Lead Risk from Housing indicator within the Study Areas.

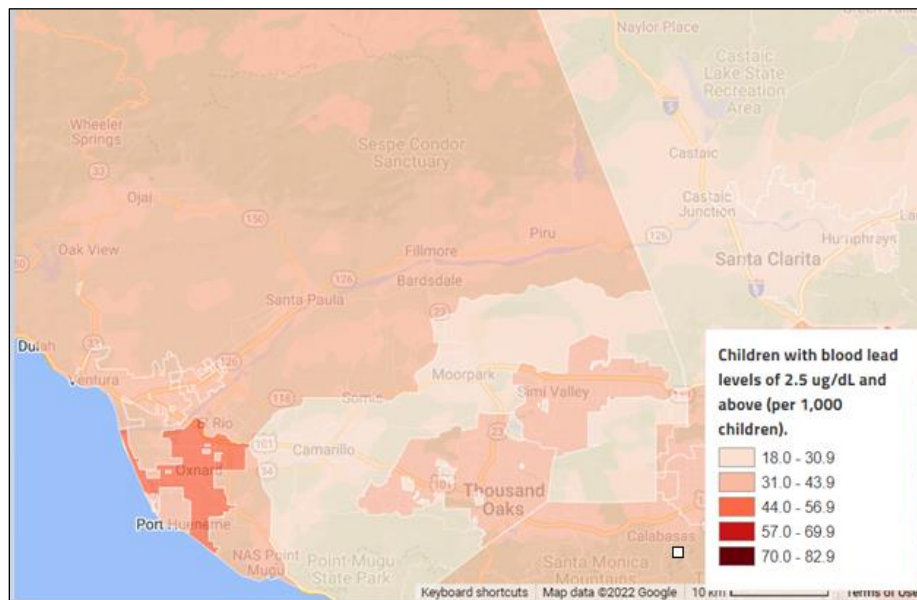
Figure 13. Children's Lead Risk from Housing Scores within the Study Areas



County-Level Information

Children aged one to five years with elevated blood lead levels (2.5 µg/dL and above) in 2010 were estimated by Tracking California, a program of the Public Health Institute, in partnership with the California Department of Public Health and the Environmental Public Health Tracking Program. Estimation results for Ventura County from Tracking California are shown below in Figure 14. Additional information on children and childhood lead poisoning are available on the Tracking California website at trackingcalifornia.org/childhood-lead-poisoning/childhood-lead-poisoning-landing.

Figure 14. Estimated Number of Children with Blood Lead Levels of 2.5 µg/dL and Above



Source: Tracking California, Public Health Institute. Maps of Predicted Lead Exposure & Testing Rates. Accessed 10/21/2022 from www.trackingcalifornia.org/hidden-lead/hidden-lead-maps

3.2.2 Drinking Water Contaminants

CalEnviroScreen Information

Drinking water sometimes becomes contaminated with chemicals or bacteria above established health standards. Both natural and human sources can contaminate drinking water. Natural sources include rocks, soil, wildlife, and fires. Human sources include factories, sewage, and runoff from farms. Nearby unauthorized or accidental hazardous materials releases can also result in local drinking water contamination.

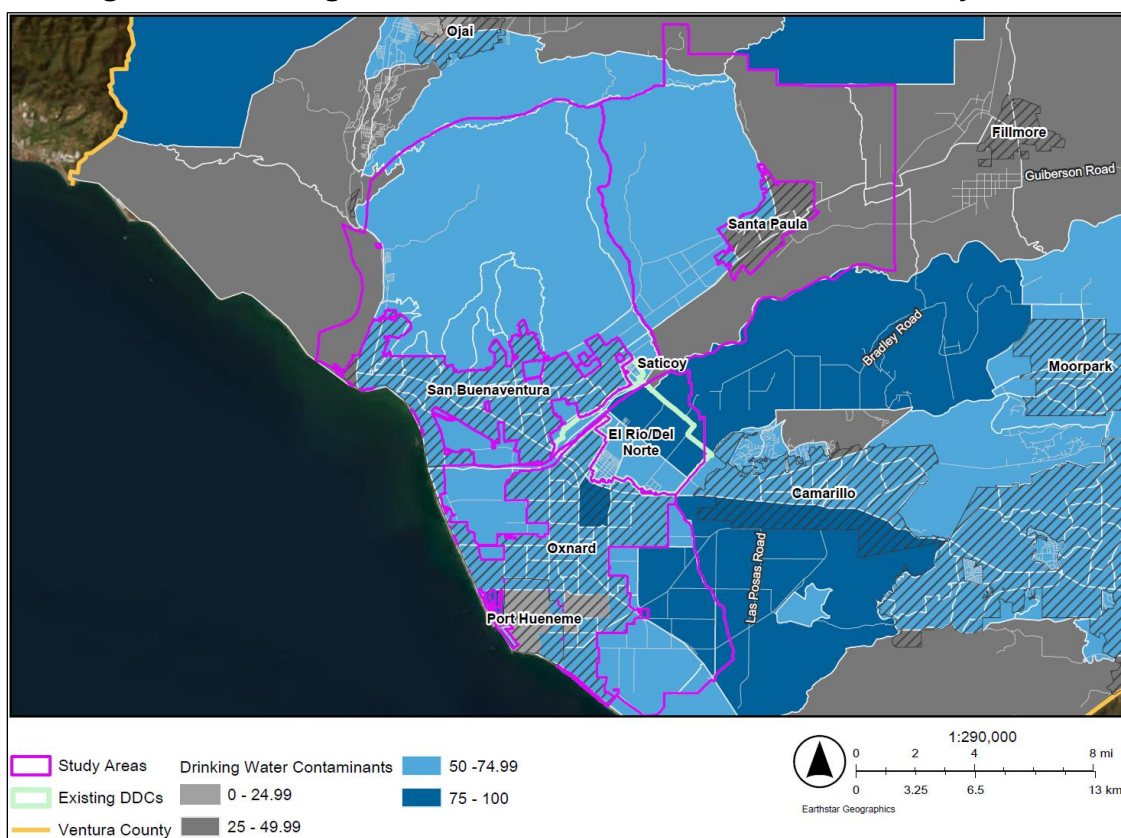
The Drinking Water Contaminants indicator in CalEnviroScreen consists of statewide percentiles determined by the average relative concentrations of contaminants, violations of drinking water standards, and whether certain contaminants were present from 2011-2019 (throughout a nine-year compliance cycle). It is important to note that scores do not reflect whether drinking water in a given census tract is safe. In 2018, 95 percent of public water systems, serving approximately 88 percent of Californians, delivered water that met all federal and state drinking water standards. However, drinking water quality varies with location, water source, treatment method, and the ability of the water purveyor to remove contaminants before distribution.

Additionally, CalEnviroScreen scores may not be reflective of the water quality in a given household as numerous systems may supply water in one census tract. Scores for each census tract are an average value of contaminant levels from all water sources in the larger geographic

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area. More specific information on local water quality may be provided by public water systems through Consumer Confidence Reports pursuant to the Safe Drinking Water Act, which are submitted annually to the United States Environmental Protection Agency (USEPA). These reports can be accessed online at: ordspub.epa.gov/ords/safewater/f?p=136:102. Tracking California also contains water quality information based on information derived from the State Water Resources Control Board (SWRCB) Water Quality Monitoring Database, also known as the Water Quality Inventory, and the Safe Drinking Water Information System database, which are also used by CalEnviroScreen in its evaluation of the Drinking Water Contaminants indicator. Tracking California displays geographic water quality information based on the location of water systems and the information they report, which is available online at trackingcalifornia.org/water-quality/water-quality-viewer. Figure 15 below shows the scoring range of the Drinking Water Contaminants indicator within the Study Areas.

Figure 15. Drinking Water Contaminants Scores within the Study Areas



County-Level Information

The EHD Drinking Water Program certifies individual potable water sources and oversees the regulation of State Small Water Systems, including performing site inspections, reviewing water sample results, and issuing operating permits for these systems in Ventura County. The EHD has established minimum requirements for defined Individual Water Systems and State Small Water Systems, based on state and county codes. Public Water Systems (water systems that serve 15 or more service connections or regularly serve at least 25 individuals daily at least 60 days annually), are permitted and regulated by the SWRCB, Division of Drinking Water.

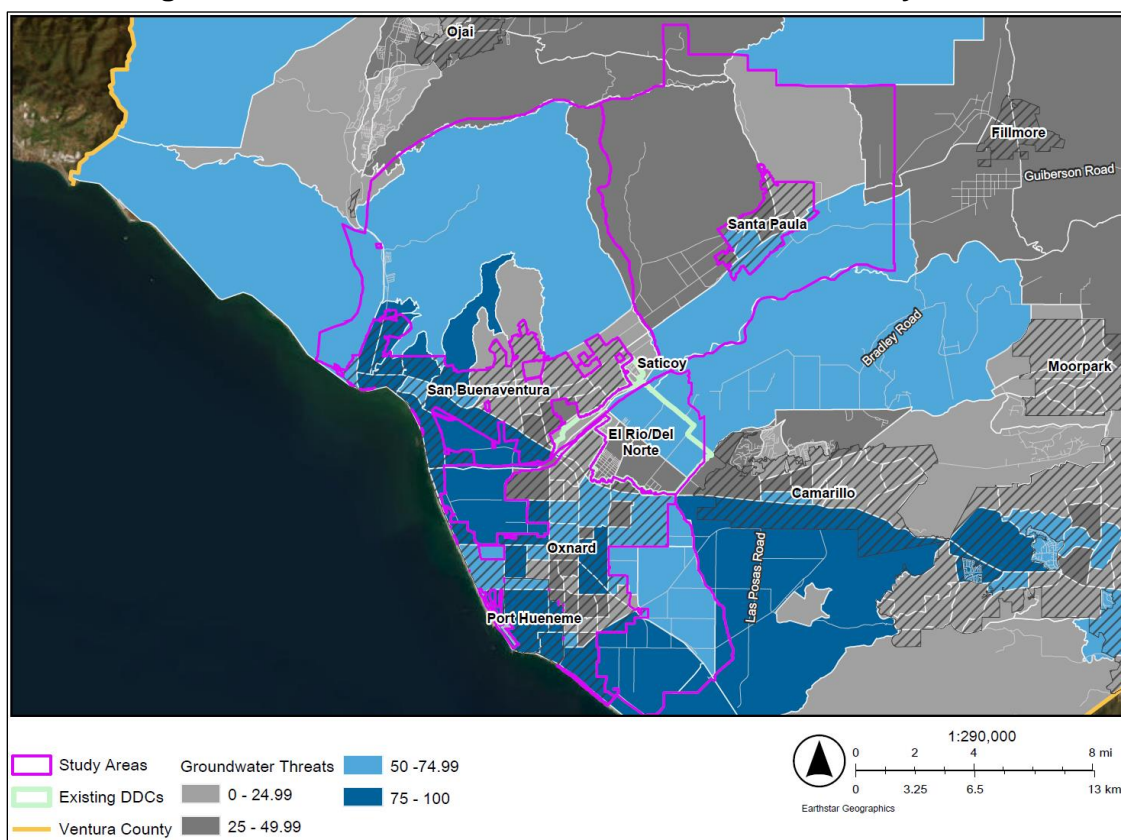
3.2.3 Groundwater Threats

CalEnviroScreen Information

According to CalEnviroScreen, hazardous chemicals are often stored in containers on land or in underground storage tanks (USTs). Leaks from these containers and tanks can contaminate soil and pollute groundwater. Scores are determined based on sites that store hazardous chemicals, their operating status, and their proximity to populated areas. Sites that may pose a risk to groundwater include leaking USTs, leaking military USTs, cleanup and land disposal sites, produced water ponds, industrial sites, airports, dairies, dry cleaners, and publicly owned sewage treatment plants. The further away threats are from a census tract, the lower its percentile score and potential exposure risk. The SWRCB manages an online database that tracks these sites known as GeoTracker, as well as the California Integrated Water Quality Systems Project, which were both used to determine the potential groundwater threats in CalEnviroScreen.

Figure 16 below shows the scoring range of the Groundwater Threats indicator within the Study Areas.

Figure 16. Groundwater Threats Scores within the Study Areas



County-Level Information

The Ventura County EHD serves as the Certified Unified Program Agency (CUPA) in Ventura County. The CUPA provides regulatory oversight for hazardous waste and hazardous materials in the county through its Hazardous Materials Program, which permits and inspects hazardous waste generators and facilities that store hazardous materials. In addition, the CUPA also regulates aboveground storage tanks that contain petroleum products (except those within the cities of Oxnard and Ventura), hazardous materials emergency response, investigation of illegal

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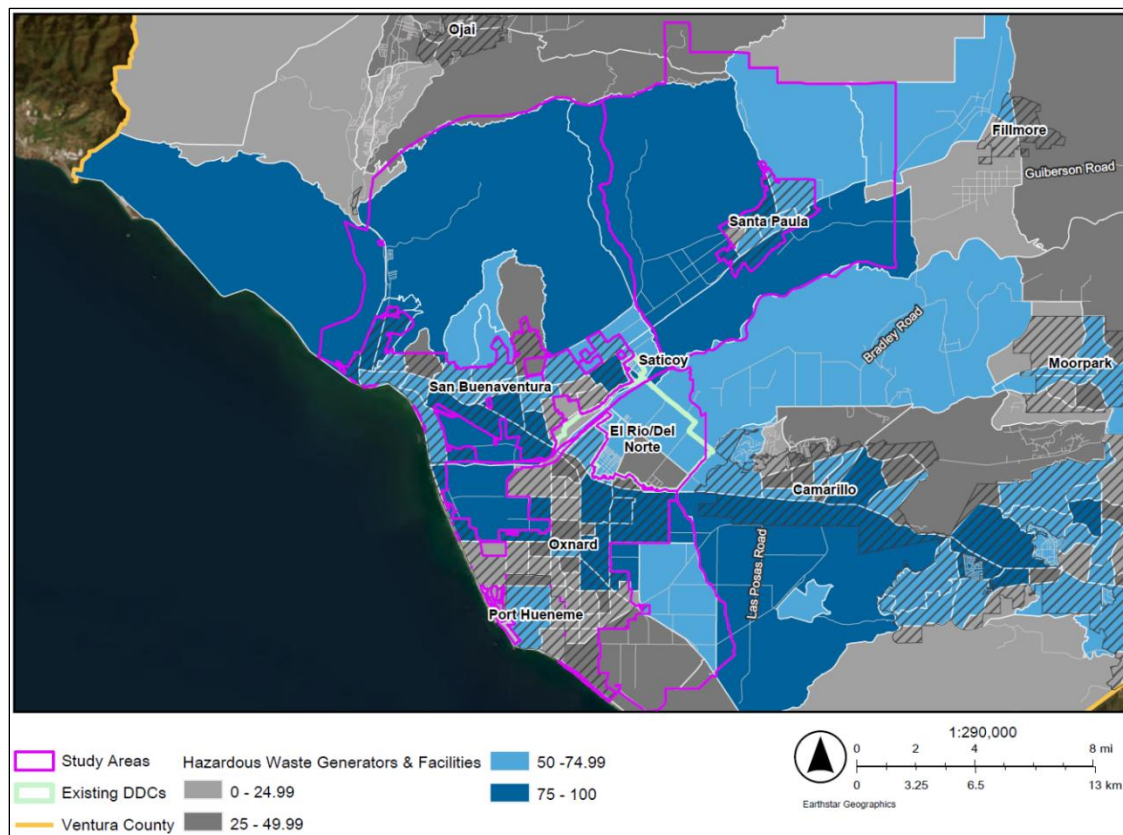
disposal of hazardous waste, and public complaints. The CUPA also regulates the construction, operation, repair, and removals of USTs (except for those within the cities of Oxnard and Ventura). Each UST site is inspected annually to determine compliance with all applicable laws and regulations.

3.2.4 Hazardous Waste Generators and Facilities

CalEnviroScreen Information

Waste created by different commercial or industrial activity contains chemicals that may be dangerous or harmful to health. Only certain regulated facilities are allowed to treat, store or dispose of this type of waste. Hazardous waste is typically transported from businesses that generate that waste to permitted facilities for recycling, treatment, storage or disposal. Scores are determined by the combination of permitted hazardous waste facilities, hazardous waste generators, and chrome plating facilities within a census tract. The further away a generator or facility is from a census tract, the lower its score and potential risk of exposure. Information used in CalEnviroScreen was derived from the Department of Toxic Substances Control and the California Air Resources Board (CARB). Proximity to hazardous waste generators and facilities does not signify exposure to toxins. Sites are designed to prevent contamination of the environment, but locations of hazardous waste sites continue to be a topic of environmental justice concern as they could have environmental, economic, social, and health impacts. Figure 17 below shows the scoring range of the Hazardous Waste Generators and Facilities indicator within the Study Areas.

Figure 17. Hazardous Waste Generators and Facilities Scores within the Study Areas



County-Level Information

Hazardous materials and hazardous waste are generated by a diverse range of industries in the county including agriculture, aerospace, on-shore and off-shore petroleum exploration, biotech, military, automotive services, public utilities, and various manufacturing and service industries. According to the General Plan¹, the majority of hazardous waste generated in the county is comprised of used oil, waste solvents, and waste batteries. The CUPA regulates an estimated 670 facilities related to hazardous waste and hazardous materials within the unincorporated areas of the County. Additionally, there are four ongoing hazardous waste cleanup sites in Ventura County that are monitored and managed by state and federal agencies.

As mentioned in Section 3.2.3 of this Study, the CUPA provides regulatory oversight for hazardous waste and hazardous materials in the county. In addition, the Ventura County Integrated Waste Management Division (in the Public Works Agency) administers the Household Hazardous Waste (HHW) collection program and operates the Pollution Prevention Center, a permanent HHW collection facility serving unincorporated residents and residents from the cities of Ojai, Santa Paula, and Fillmore. The County maintains information on permitted HHW facilities and holds monthly HHW collection events at the County's Pollution municipal jurisdictions within the county also offer similar monthly collection events.

3.2.5 Impaired Water Bodies

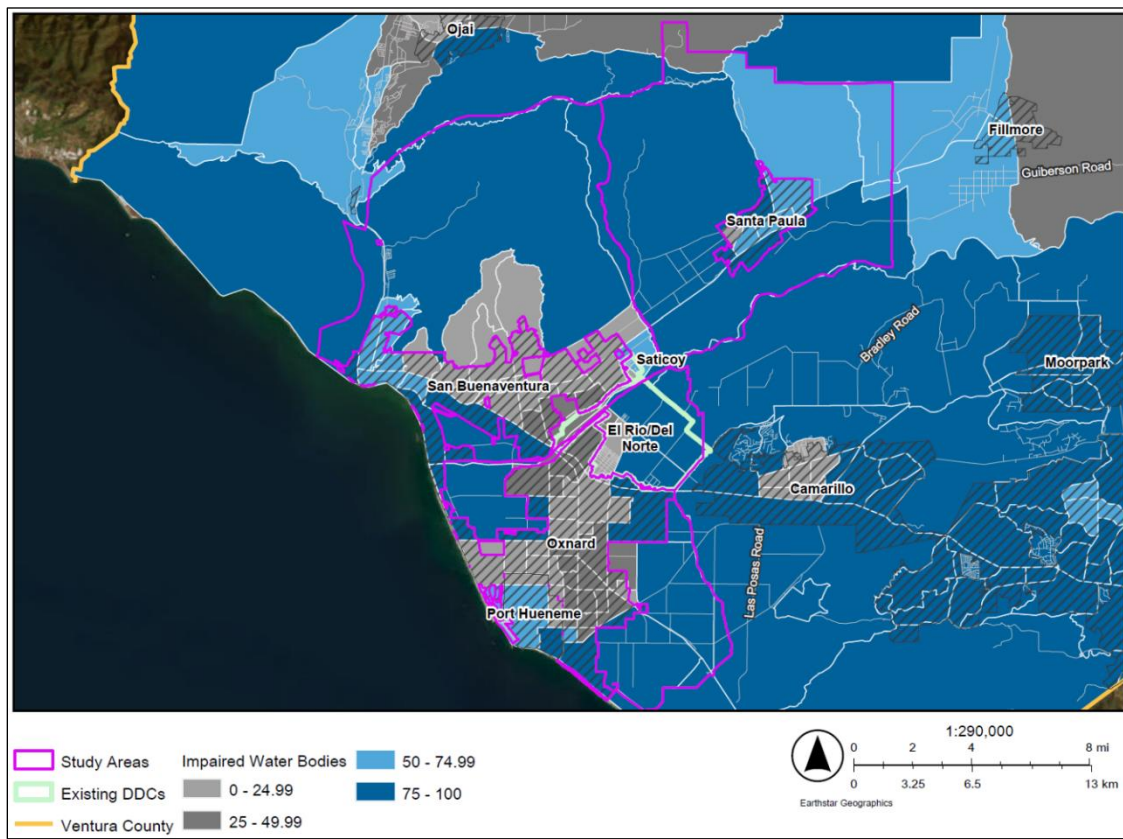
Pursuant to the federal Clean Water Act, states must establish water quality standards for waters within their borders. Such standards designate the use of the particular water body (e.g., recreation or protection of aquatic life), establish water quality criteria to protect the water body, and adopt requirements to protect and maintain healthy waters. Under the Clean Water Act section 303(d), states are required to review, make changes as necessary, and submit to the USEPA a list of water bodies that do not meet water quality standards, referred to as the list. Each state must develop a Total Maximum Daily Load (TMDL) for every identified pollutant/water body. An essential component of a TMDL is the calculation of the maximum amount of a pollutant that can occur in a water body and still meet water quality standards. Federal regulations require the evaluation of "all existing and readily available information" in developing a list (40 C.F.R. §130.7(b) (5)). This means that states cannot select what data/information they use and purposely disregard others. The USEPA's regulations contain a nonexclusive list of information that must be considered. The SWRCB administers the listing and reporting of impaired water bodies in California.

CalEnviroScreen Information

The Impaired Water Bodies indicator scores are determined by the sum of the number of all pollutants present in impaired water bodies, including streams, rivers, lakes, estuaries, and marine waters within the area. However, CalEnviroScreen does not distinguish the type of pollutant and the designated use of the water body in its summation. The number of pollutants listed in lakes, bays, estuaries, or shorelines that are located within one or two kilometers of a census tract's population. Figure 18 below shows the scoring range of the d . Impaired Water Bodies indicator within the Study Areas.

¹ The Background Report is available online at vcrma.org/en/ventura-county-general-plan.

Figure 18. Impaired Water Bodies Scores within the Study Areas



County-Level Information

According to the County General Plan, Impaired Water Bodies are considered compromised as sources for drinking, swimming, fishing, aquatic life protection, and other beneficial uses. Instances of Impaired Water Bodies within the El Rio/Del Norte community include the Brown Barranca in the northern portion of the El Rio/Del Norte planning area, the Calleguas Creek Reach 5 adjacent to the El Rio/Del Norte southern boundary, the Santa Clara Reach 3 located from Freeman Diversion to A Street, and the Fox Barranca tributary to Calleguas Creek Reach 6. There are approximately 15 documented Impaired Water Bodies in one Piru census tract including Lake Priu, Piru Creek, and Pyramid Lake. The Ventura River and its tributaries also are considered impaired due to fish barriers and pumping/water diversion, total dissolved solids, aluminum, and mercury. Rincon Beach and the Ventura Harbor are listed for impairments due to bacteria. The Ventura Marina jetties are listed as impaired with Dichlorodiphenyltrichloroethane (also known as DDT), a compound found in insecticides that has been banned in the United States since 1972, and polychlorinated biphenyls (also known as PCBs), a type of synthetic industrial compound.

3.2.6 Pesticide Use

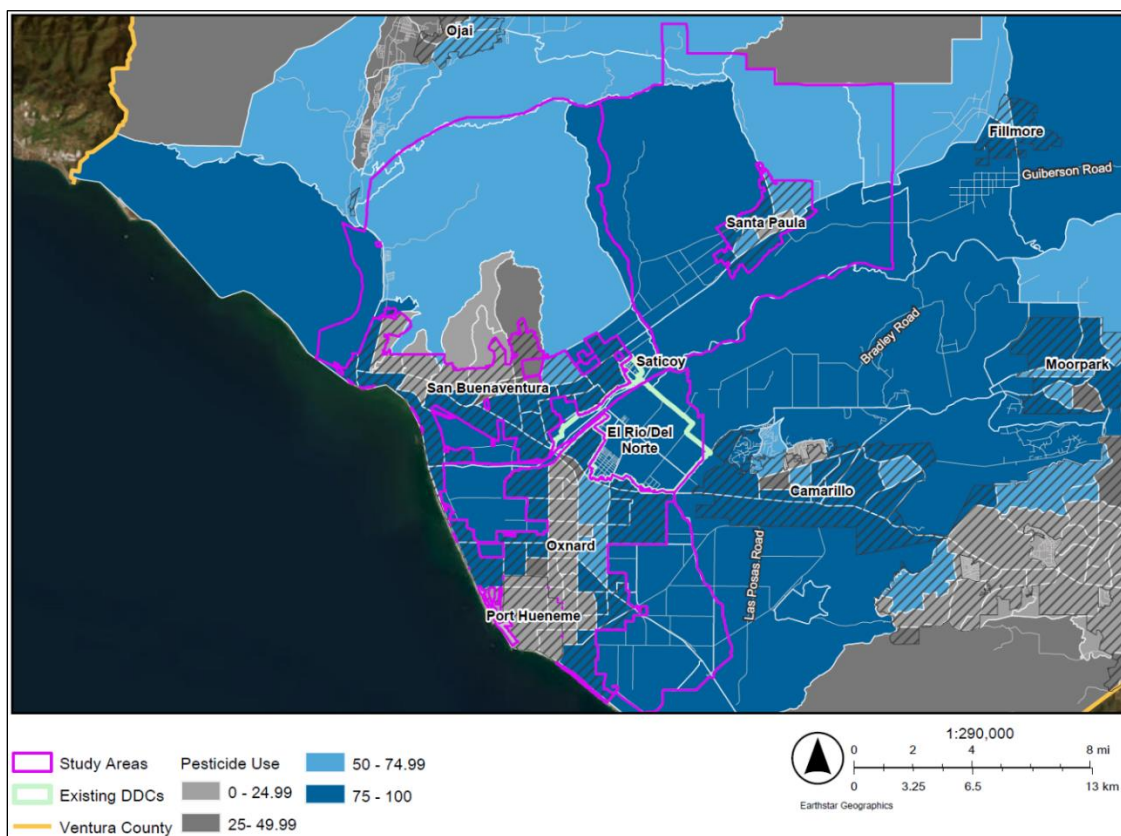
CalEnviroScreen Information

Pesticide Use indicator scores are determined using data from the California Department of Pesticide Regulation (DPR), which consists of the total number of pounds of 132 active pesticide ingredients deemed volatile (indicating higher likelihood of drift and exposure) and/or hazardous used in agriculture production per square mile, averaged from 2017 to 2019. DPR data in CalEnviroScreen is compiled from pesticide use reports submitted to DPR by local Agricultural Commissioner's offices through the methods used in pesticide exposure

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analysis because statewide data on pesticide air monitoring is not available. The CalEnviroScreen scores for Pesticide Use indicate the potential amount of pesticide that could enter the environment and affect communities based on the reported amount of pesticide used. However, additional details such as field inspections of pesticide use and applications, compliance monitoring, and enforcement of pesticide use violations, are available at the local level and should be considered in conjunction with CalEnviroScreen data when evaluating Pesticide Use in accordance with the State Guidelines of OPR. In its report, CalEnviroScreen notes that its state-level data indicates that communities at risk of potential exposure to Pesticide Use are communities near agricultural fields, primarily farm worker communities. This assumption does not take into account the safeguards implemented in California's comprehensive framework that are designed to prevent exposures. Figure 19 below shows the scoring range of the Pesticide Use indicator within the Study Areas.

Figure 19. Pesticide Use Scores within the Study Areas



County-Level Information

The Ventura County Department of Agriculture/Weights & Measures (AWM) collects data on pesticide use, which is sent to the DPR where data from all over the State is compiled annually. The AWM regulates the Pesticide Use Enforcement (PUE) Program, which benefits the public, the agricultural industry, and the environment by permitting the legal and safe use of necessary pest control products and taking action against those who use these products illegally or unsafely. The AWM has jurisdiction over all uses of pesticides including home and garden uses, agricultural uses, industrial and institutional uses, and use for structural pest control. The PUE program closely monitors the agricultural use of pesticides and the use of Restricted Materials (as defined in the California Code of Regulations (CCR) section 6400, unless exempted by CCR section 6402). The PUE program also investigates reported incidents of pesticide related illnesses and

violations of any applicable laws and regulations. The AWM also conducts inspections to see whether required records are kept, whether training has been provided to pesticide handlers and agricultural workers, and whether required waiting periods have been observed before workers re-enter treated fields or before crops are harvested. Fines are issued for any violations related to the application of pesticides.

Permits for all restricted materials, or products deemed by the State to pose the most risk to handlers, fieldworkers, the public or the environment are issued by the Agricultural Commissioner. Specific conditions are issued for the use of restricted materials, such as a site inspection and a 24-hour notification prior to application, to mitigate any hazards associated with application of restricted materials.

The AWM regularly engages in public outreach to school districts, concerned parties and underserved communities. Meetings are frequently held with groups such as the Central Coast Alliance United for a Sustainable Economy (CAUSE), Mixteco Indigena Community Organizing Project, Lideras Campesinas, Ventura County Coalition Advocating for Pesticide Safety, Rincon Vitova Insectary, and others to address concerns and discuss viable alternatives to the most toxic pesticides. Title 3, Section 6692 of the CCR regulates the use of pesticides nearby schools and day-care centers. The 2018-2019 Ventura County Grand Jury concluded that the County government effectively implemented regulations and effectively reduced the exposure of students and faculty in campuses adjacent to agricultural use of pesticides, herbicides, and fumigants.

For more information on the County's agricultural operations, refer to Chapter 9 of the General Plan Background Report and Section 4.2 of the General Plan Environmental Impact Report, both of which are available online at vcrma.org/en/ventura-county-general-plan.

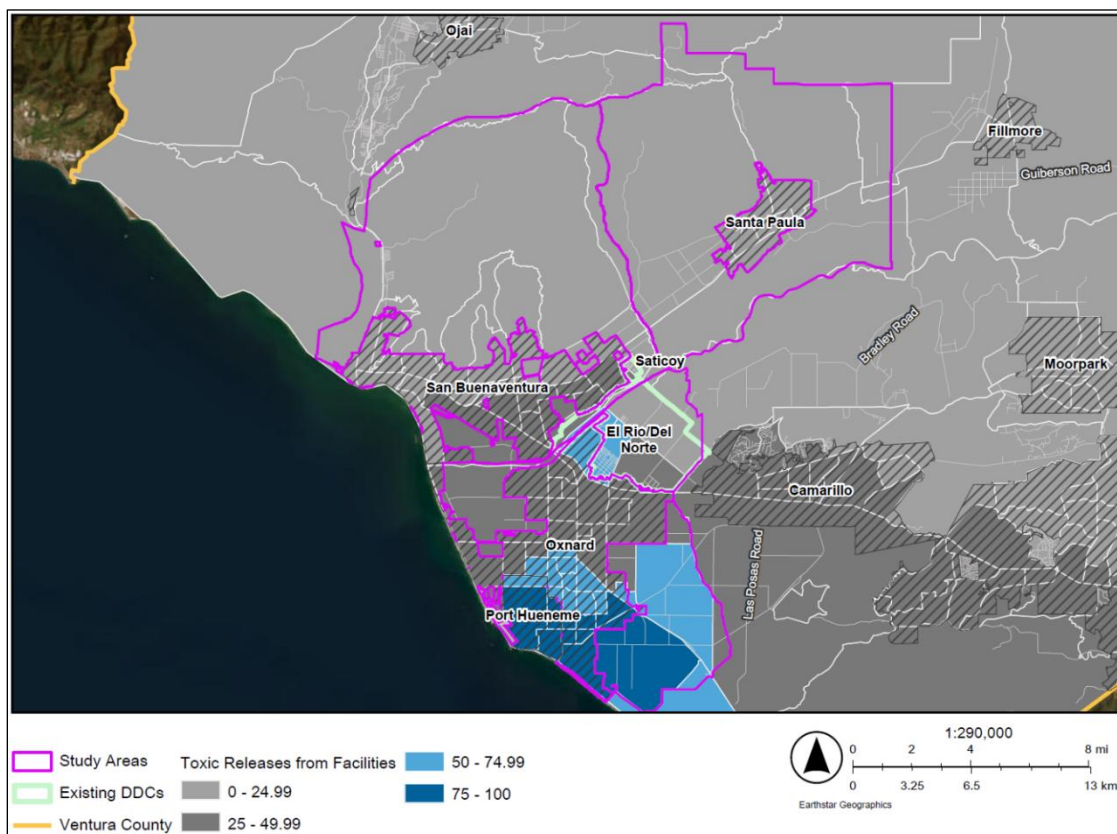
3.2.7 Toxic Releases from Facilities

CalEnviroScreen Information

Toxic Releases from Facilities indicator scores are based on the USEPA Toxic Release Inventory (TRI) reports of on-site and off-site chemical releases. CalEnviroScreen modelled California TRI air releases from 2017 to 2019 using the USEPA's Risk Screening Indicators, a computer-based screening tool that analyzes factors related to toxic releases that may result in chronic human health risks². This information is used by CalEnviroScreen to analyze potential risk of exposure to toxic releases because direct measurements of exposure to toxic releases at the state level is not available. In general, toxic releases are associated with a higher overall mortality rate. In addition, toxic releases have been found to disproportionately affect low-income communities and communities of color. Figure 20 below shows the scoring range of the Toxic Releases from Facilities indicator within the Study Areas.

² The Risk Screening Environmental Indicators modelling tool can be found online at www.epa.gov/rsei/ways-get-rsei-results.

Figure 20. Toxic Releases from Facilities Scores within the Study Areas



County-Level Information

There are hundreds of stationary sources in Ventura County that emit toxic substances and are subject to the Air Toxics “Hot Spots” Information Act of 1987 (Health and Safety Code Section 44300 et seq.). The primary purpose of this law is to notify the public of facilities that have routine and predictable emissions of toxic air pollutants that may pose a significant health risk to nearby residents and workers. The Air Toxics “Hot Spots” Assessment Act also requires high priority facilities to reduce the health risk to below the level of significance.

The stationary sources subject to the Air Toxics “Hot Spots” information Act are also referred to as air toxic facilities, which may include, but are not limited to, gasoline service stations, dry cleaning facilities, County-owned facilities, water treatment plants, and generators. The majority of air toxic facilities in the county are concentrated in incorporated cities. The Ventura County Air Pollution Control District (APCD) publishes annual reports that summarize health risk assessments, rank facilities according to the cancer risk posed, identify the facilities posing non-cancer health risks, and describe the status of the development of control measures. Annual reports are available online at vcapcd.org/air_toxics.htm.

3.3 Population Characteristics

There are two categories of Population Characteristics analyzed in CalEnviroScreen: Sensitive Population indicators and Socioeconomic Factor indicators. The census tracts that were analyzed in each Study Area did not score at or above 75 for Sensitive Population indicators. Sensitive Population indicators were analyzed in CalEnviroScreen based on data provided by the State of California, Office of Statewide Health Planning and Development, and the California Department

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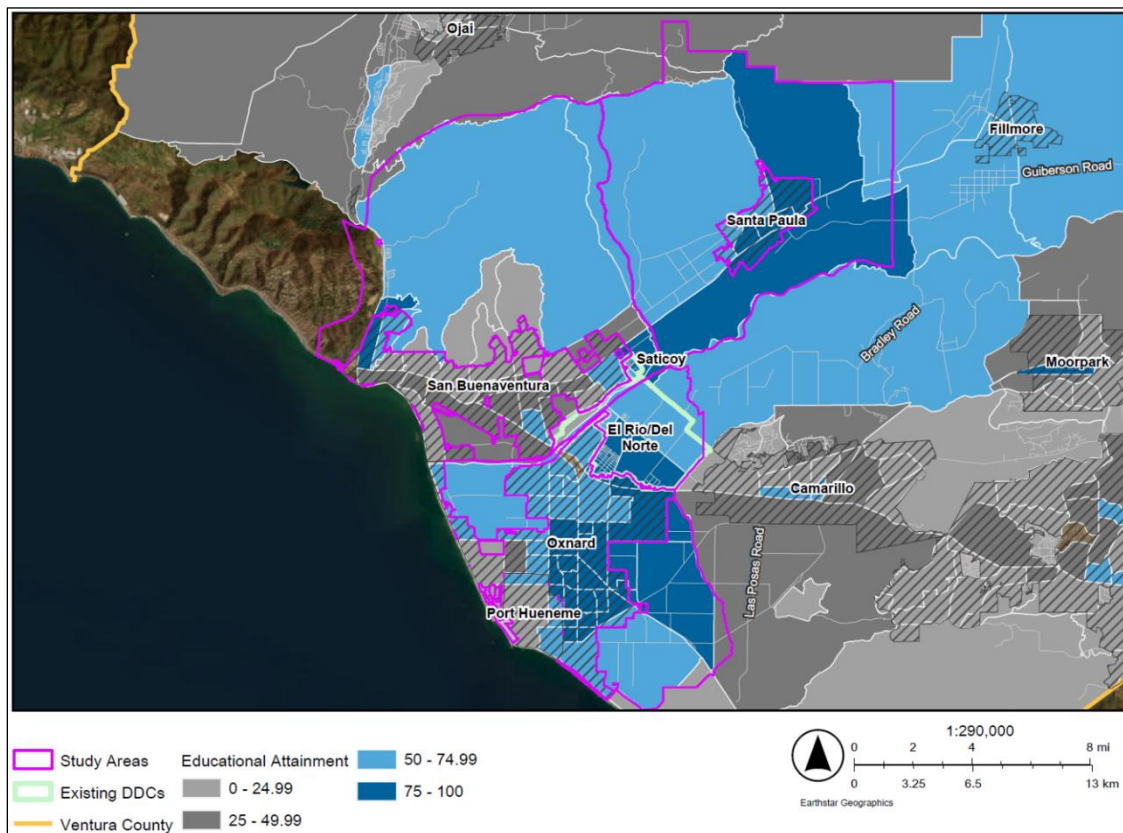
of Public Health for asthma emergency department visits, cardiovascular disease and low birth-rate infants. Additional information on the analysis and scores for Sensitive Population indicators can be found in the CalEnviroScreen 4.0 Report and the CalEnviroScreen 4.0 Interactive Maps.

The data analyzed for Socioeconomic Factor indicators was acquired from the ACS. The ACS gathers information from a sample of the population on a yearly basis and compiles averages to create more accurate estimates of each region. CalEnviroScreen scores are based on the five-year averages provided by ACS. The most recent dataset that CalEnviroScreen uses is from 2015 to 2019,³ which can be categorized by various geographic scales used by the Census Bureau, including census tracts. Brief descriptions of the Socioeconomic Factor indicators with the highest scores in the Study Areas are provided in the following sections.

3.3.1 Educational Attainment

Education Attainment scores are determined based on the percentage of individuals 25 years or older with less than a high school education. Having a lower level of education is correlated with increased exposure to environmental pollutants, economic hardship, and a lower life expectancy. Although increased education correlates with improved health, people of color see fewer health benefits from educational attainment. Figure 21 below shows the scoring range of the Educational Attainment indicator within the Study Areas.

Figure 21. Educational Attainment Scores within the Study Areas

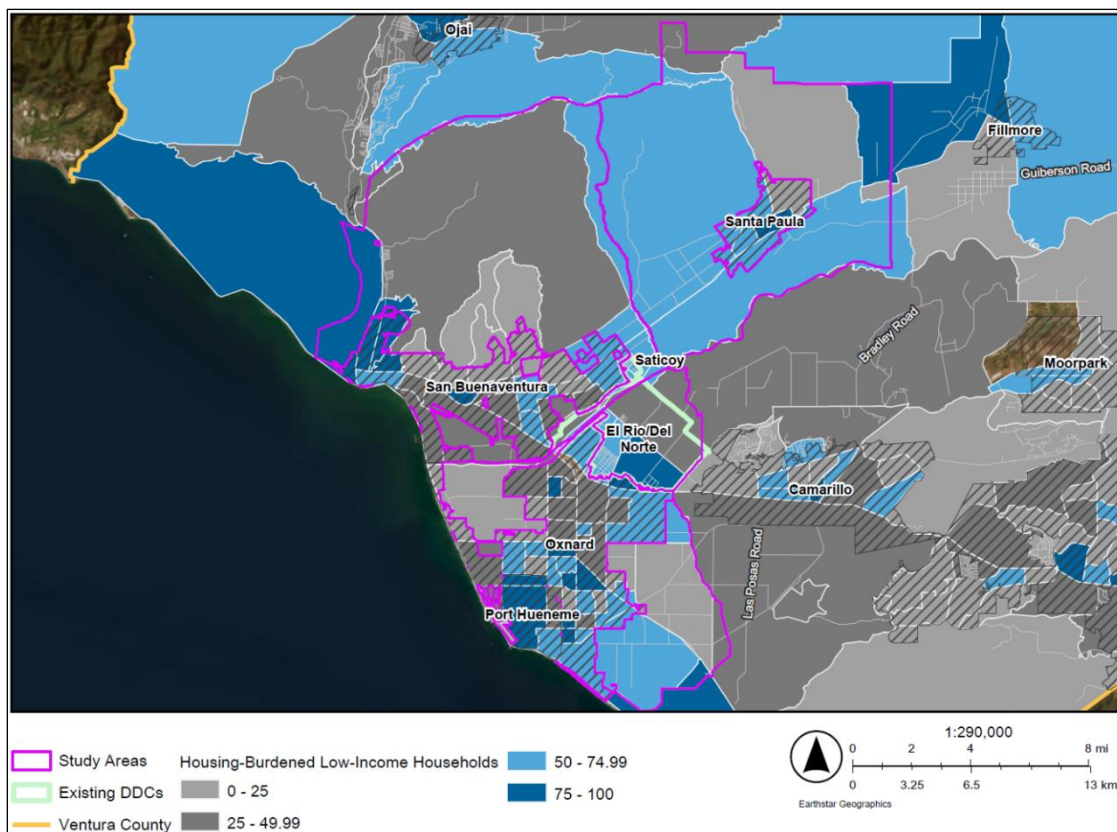


³ Although more recent ACS data is available, this data has not yet been integrated into CalEnviroScreen 4.0.

3.3.2 Housing-Burdened Low-Income Households

Scores for Housing-Burdened Low-Income Households are determined based on the percentage of households in a census tract that are low-income (making less than 80 percent of the census tract's Area Median Income as determined by the United States Department of Housing and Urban Development) and paying greater than 50 percent of their income in housing costs. Those suffering from high housing cost burdens may suffer from health impacts, residential instability, and increased levels of stress and depression. Non-white households are more likely to have high housing cost burdens. Figure 22 below shows the scoring range of the Housing-Burdened Low-Income Households indicator within the Study Areas.

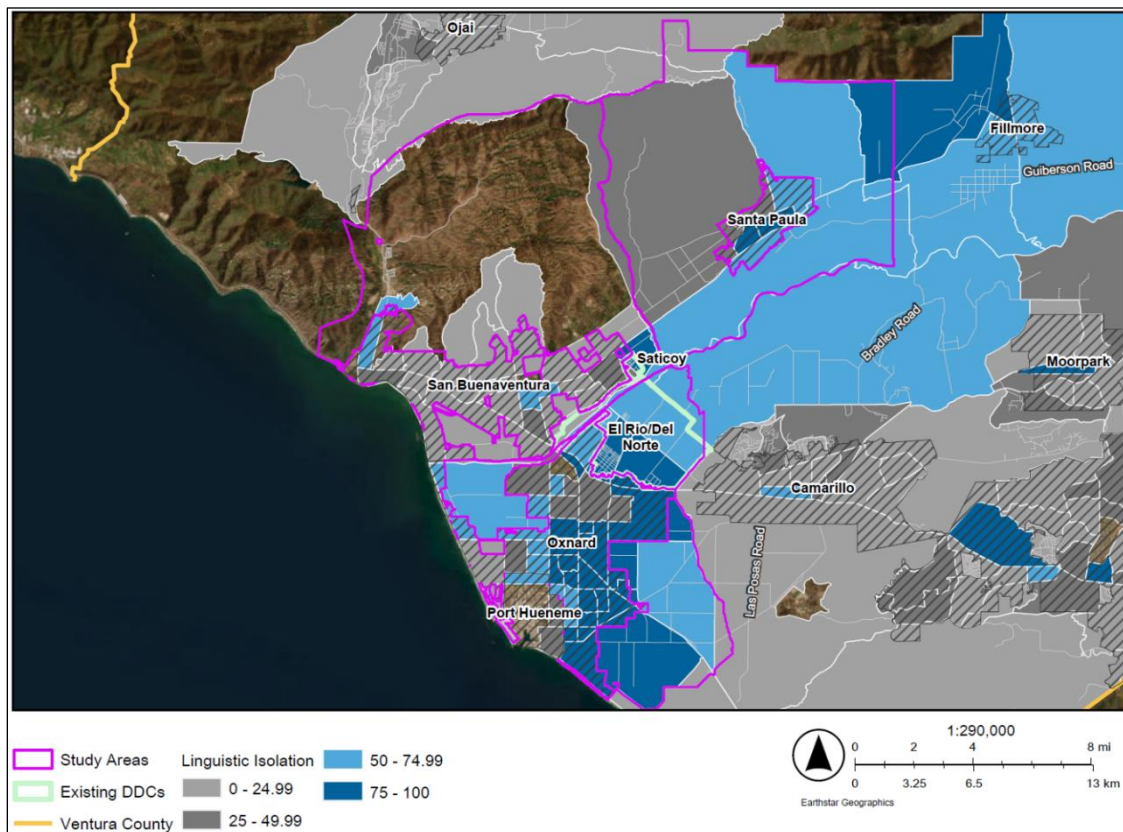
Figure 22. Housing-Burdened Low-Income Households Scores within the Study Areas



3.3.3 Linguistic Isolation

Scores for Linguistic Isolation are determined based on the percentage of households where all individuals 14 years and older possess limited English-speaking abilities. Having limited knowledge of English can impede the ability to access services, including health services, and can reduce the ability to engage in public processes. In addition, limited English-speaking abilities create difficulty and uncertainty in hearing important announcements, such as public emergency announcements. Figure 23 below shows the scoring range of the Linguistic Isolation indicator within the Study Areas.

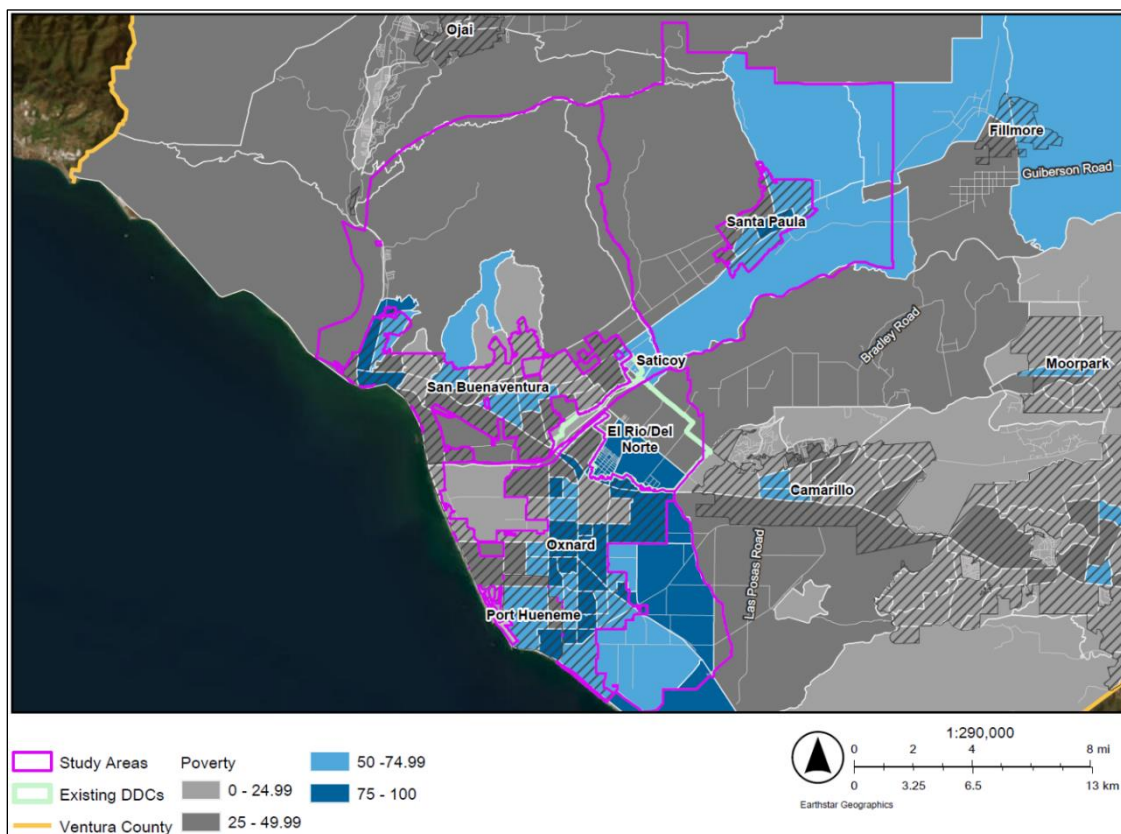
Figure 23. Linguistic Isolation Scores within the Study Areas



3.3.4 Poverty

Scores for Poverty are determined based on estimates of those living below two times the federal poverty level. This threshold is used because the cost of living in California is higher than many other states. Those living in poverty have an increased likelihood of exposure to pollution and hazards as well as chronic stressors. These factors have a negative impact on the health of individuals and communities. Figure 24 below shows the scoring range of the Poverty indicator within the Study Areas.

Figure 24. Poverty Scores within the Study Areas



3.4 Other Disadvantaged Community Screening Tools

Other state and federal agencies use different screening tools to help identify disadvantaged communities as required by state law or federal initiatives. Some of these screening tools were reviewed to compare different methodologies and to determine how communities were identified using these tools as compared to those identified by CalEnviroScreen. Table 8 below summarizes the screening tools that were reviewed, and Figures 25 through 28 shows screen captures of each tool. Overall, the areas identified as disadvantaged in one or more of these screening tools are similarly aligned with the qualifying census tracts, or with existing DDCs identified in the General Plan.

Table 8. Other Disadvantaged Community Screening Tools

Name of Screening Tool	Managing Agency/Institution	Qualifying Census Tracts in the Study Areas that are Identified by Other Screening Tools
Disadvantaged Communities Mapping Tool	California Department of Water Resources (DWR)	2300, 0400, 0500, 4902
Statewide Disadvantaged Unincorporated Communities Map	California Association of Local Agency Formation Commissions (CALAFCo)	Areas identified are within DDCs established in the General Plan
Climate and Economic Justice Screening Tool	United States Council on Environmental Quality (USCEQ)	2300, 0400, 0500, 4902, 4715, 4704

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Name of Screening Tool	Managing Agency/Institution	Qualifying Census Tracts in the Study Areas that are Identified by Other Screening Tools
Environmental Justice Areas Map	Southern California Association of Governments (SCAG)	2300, 0400, 0500, 4902, 4715, 4704

Figure 25. Disadvantaged Communities Mapping Tool, DWR

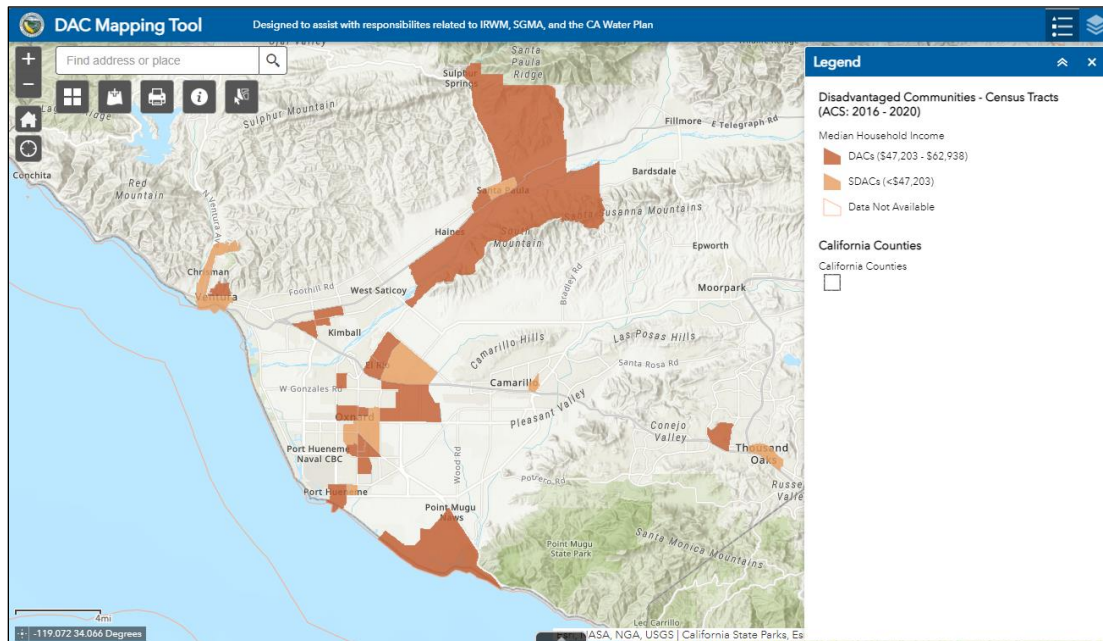


Figure 26. Disadvantaged Unincorporated Communities, CALAFCo

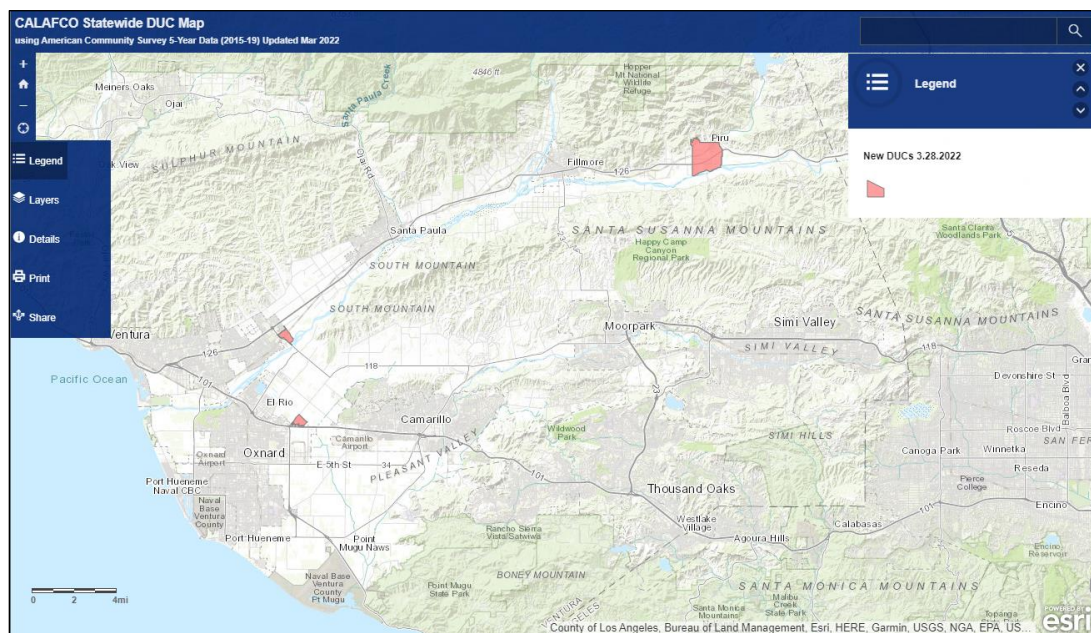


Figure 27. Climate and Economic Justice Screening Tool, USCEQ

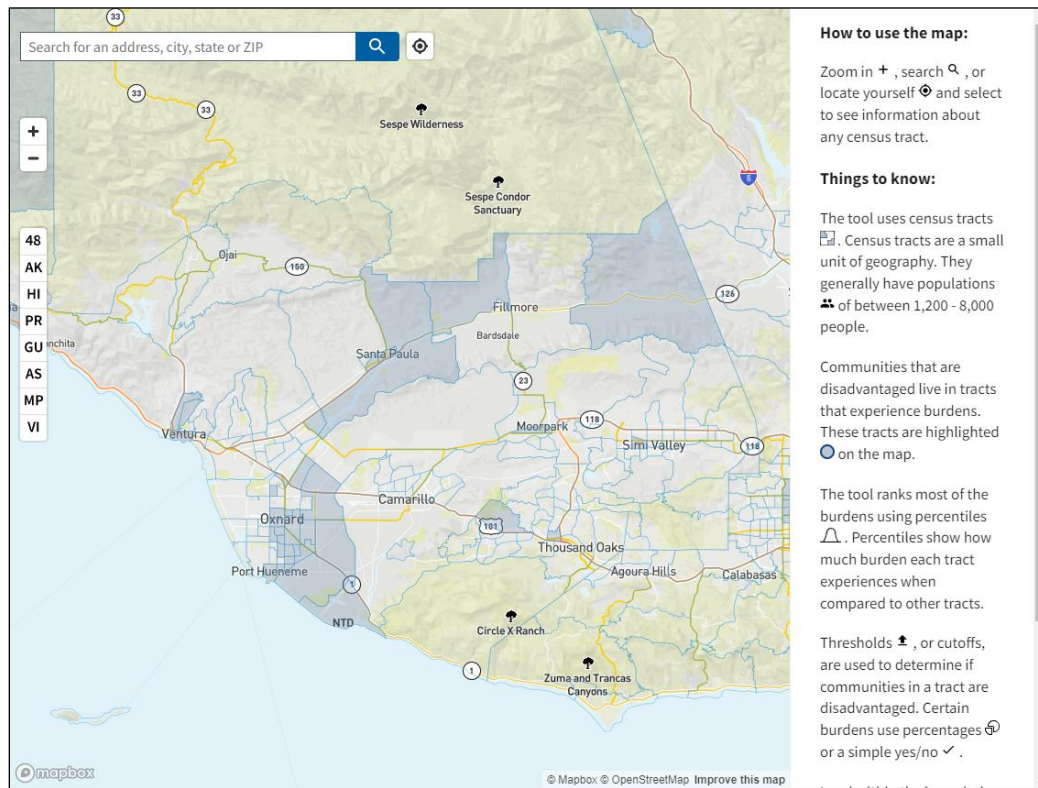
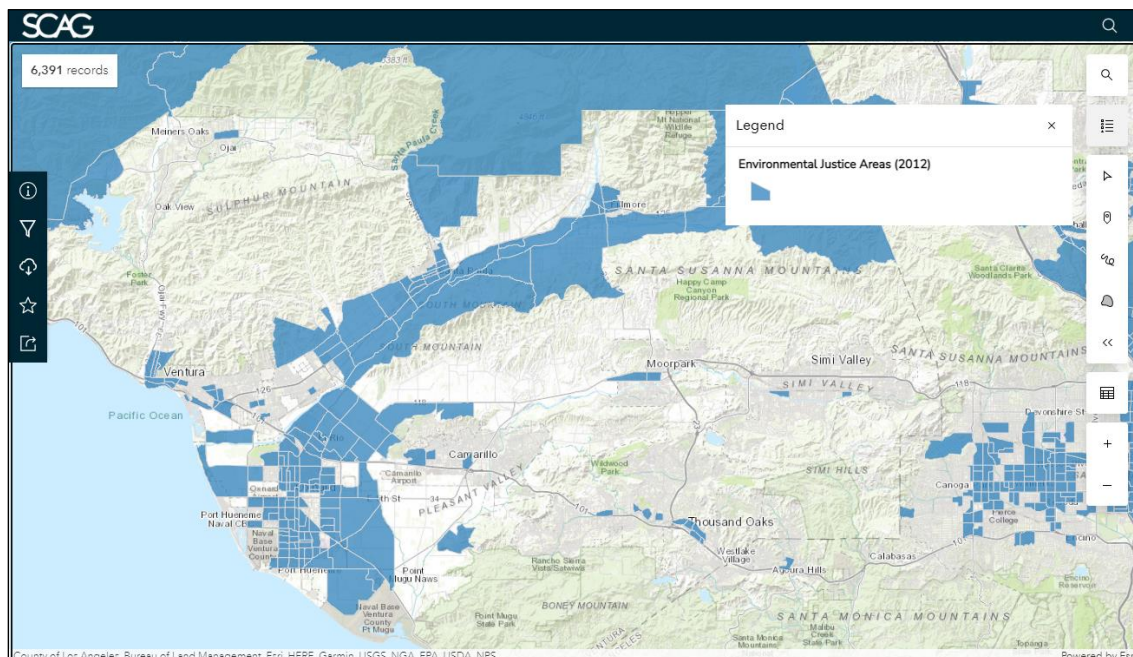


Figure 28. Environmental Justice Areas Digital Map, SCAG



4. Initial Options for Designating Disadvantaged Communities

Potential disadvantaged communities were initially identified using qualifying census tracts within the Study Areas based on the information outlined in Chapter 2 (Project Parameters). However, as explained in the following sections, critical limitations of this approach were identified. Thus, two alternative options (Options 1 and 2) were explored to identify disadvantaged communities based on research of local data and individual CalEnviroScreen indicators. Staff conducted public engagement on these two options, which led to the need for additional research on the methodology to identify disadvantaged communities, taking into consideration potentially disadvantaged areas identified through community input and policy implications on any potential designations. As a result of this effort, staff developed a third option (Option 3) that focuses on residential areas and schools, taking into consideration how DDC policies in the General Plan could be applied to these areas. The following sections in this chapter discuss in chronological order the steps staff took in developing and studying Options 1 and 2, followed by a discussion of the public engagement conducted to collect community feedback on these two options. Chapter 6 (Development of Option 3) provides a detailed discussion on the development of Option 3.

4.1 Limitations of Identifying DDCs Using Qualifying Census Tracts

The areas identified as a “qualifying census tract” in Section 2.3. As noted elsewhere in this Study, the Planning Division found limitations to identifying DDCs based upon qualifying census tract boundaries. Such limitations include the following:

- The qualifying census tracts within each Study Area contain incorporated city lands, which are not within the County’s jurisdiction;
- Presence of nearby unincorporated communities in the Ventura Study Area and Santa Paula Study Area (e.g., residential areas or schools) would not be included as they are not located within the qualifying census tracts;
- A large extent of the sparsely populated agricultural and open space lands in the Santa Paula Study Area and Oxnard Study Area would be included; and
- Areas that would be designated as disadvantaged communities within the qualifying census tracts exclude areas in the immediate vicinity that may be disproportionately affected by environmental pollution and other hazards.

Given the above limitations, staff initially explored two options to identify potential disadvantaged communities in the Study Areas, taking into account the following priorities:

- Focus on residential areas;
- Include only unincorporated areas, as the County does not have jurisdictional authority over portions of census tracts within incorporated areas; and
- Develop designation methodologies that are objective and transparent and can be used in future applications for evaluating DDCs.

Applying the State Guidelines explained in Section 1.2 and Section 3, staff took into consideration local community factors such as surrounding land uses, location of existing residential areas, and their proximity to industrial and agricultural uses to develop options for identifying disadvantaged

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communities. The first two options explored by staff and introduced to the community during public engagement are summarized as follows:

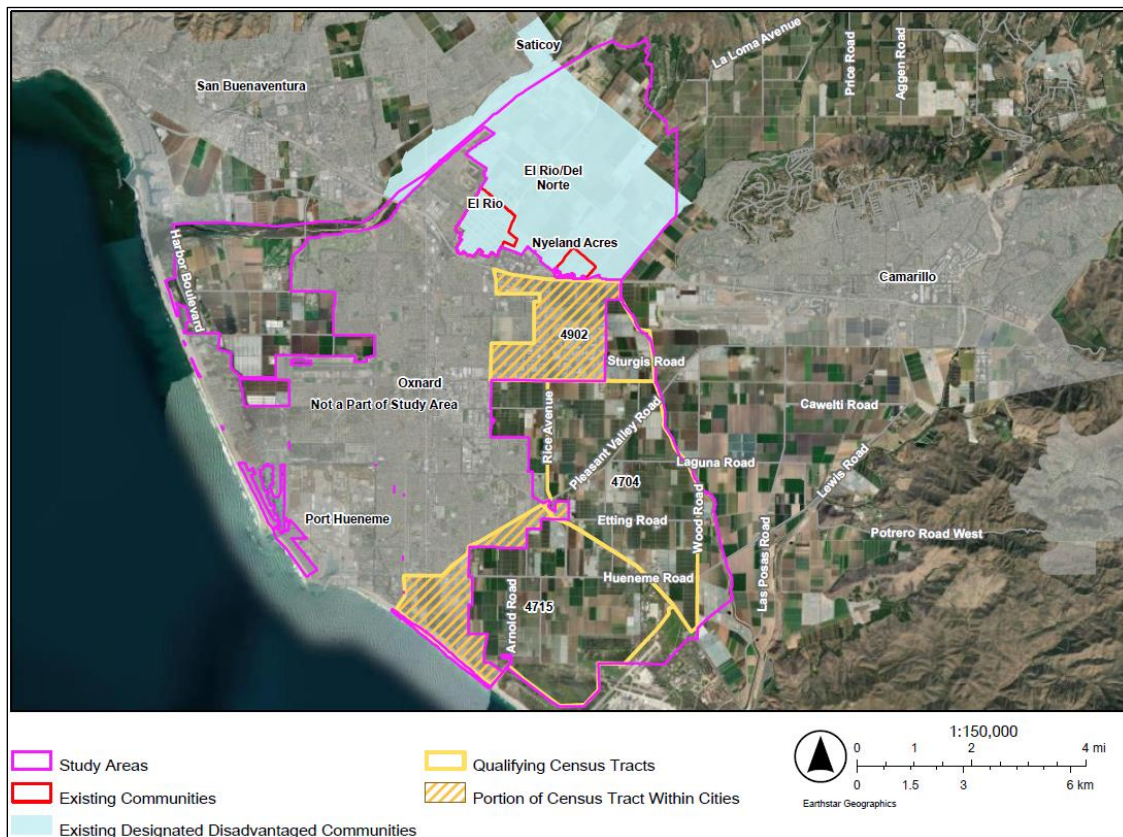
- Option 1: designation based on County Area Plan boundary, or in the absence of an applicable Area Plan, on the Area of Interest boundary.
- Option 2: designation based on the Existing Community boundary as identified in the General Plan if the applicable Existing Community contains residential land uses.

The following sections describes Options 1 and 2 and the resulting disadvantaged communities within each Study Area in further detail.

4.2 Applying Options 1 and 2 in the Oxnard Study Area

Options 1 and 2 do not identify additional disadvantaged communities within the unincorporated Oxnard Study Area that are not already designated in the General Plan (see Figure 29). The unincorporated areas within the qualifying census tracts, are largely comprised of agricultural land. Most residential areas within or adjacent to the qualifying census tracts are within the boundaries and jurisdictional authority of the City of Oxnard. While the El Rio and Nyeland Acres communities in the unincorporated area would constitute potential DDCs under Option 1 using the El Rio/Del Norte Area Plan boundary, and under Option 2 using the boundaries of the El Rio and Nyeland Acres Existing Communities, both areas are already identified as DDCs in the General Plan.

Figure 29. Potential DDCs Based on Alternative Options: Oxnard Study Area



Note: Portions of census tracts within cities are not within County jurisdictional authority to designate disadvantaged communities.

4.3 Potential DDCs Based on Option 1

Option 1 is consistent with the methodology of identifying the adopted DDCs for the Saticoy, El Rio/Del Norte, and Piru areas, which applied the respective Area Plan boundary to identify disadvantaged communities. Figures 30 and 31 below depicts Option 1 in the Ventura and Santa Paula Study Areas. Refer to Appendix D for a summary table comparing all options for each Study Area. The following points were taken into account when considering Option 1:

- The North Ventura Avenue Area Plan was applied in the Ventura Study Area and the Santa Paula Area of Interest was applied in the Santa Paula Study Area. The Area Plan and Area of Interest boundaries include areas that extend beyond the qualifying census tract boundaries. Those extended areas have scores above 75 for individual environmental pollution indicators in CalEnvir Housing, Pesticide Use, Hazardous Waste Generators and Facilities, Impaired Water Bodies, and Solid Waste Sites. These indicators are explained in further detail in the Study.
- Industrial and oil and gas operations in the Ventura Study Area would be included in a potential DDC.
- The application of the Area of Interest boundary in the Santa Paula Study Area resulted in a large geographical area that would be included in a potential DDC, including large swaths of open space and agricultural lands, as well as industrial land uses.

Figure 30. Potential DDCs Based on Option 1: Ventura Study Area

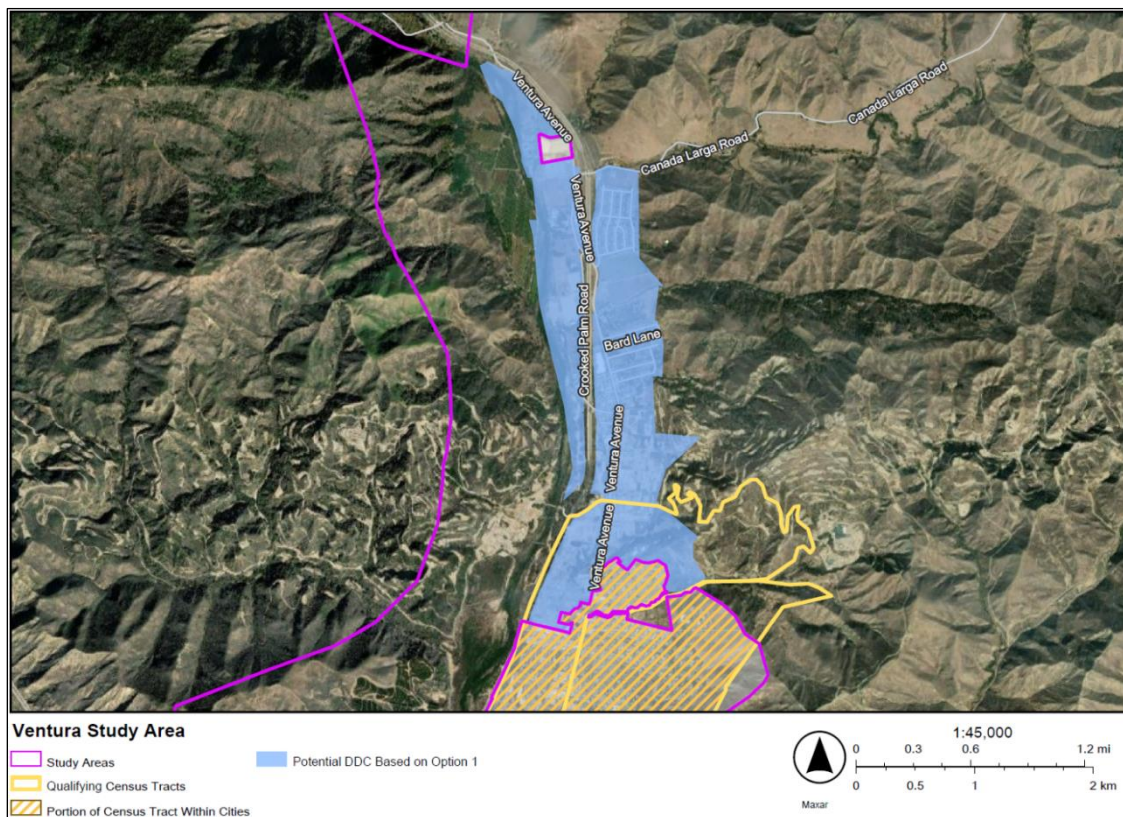
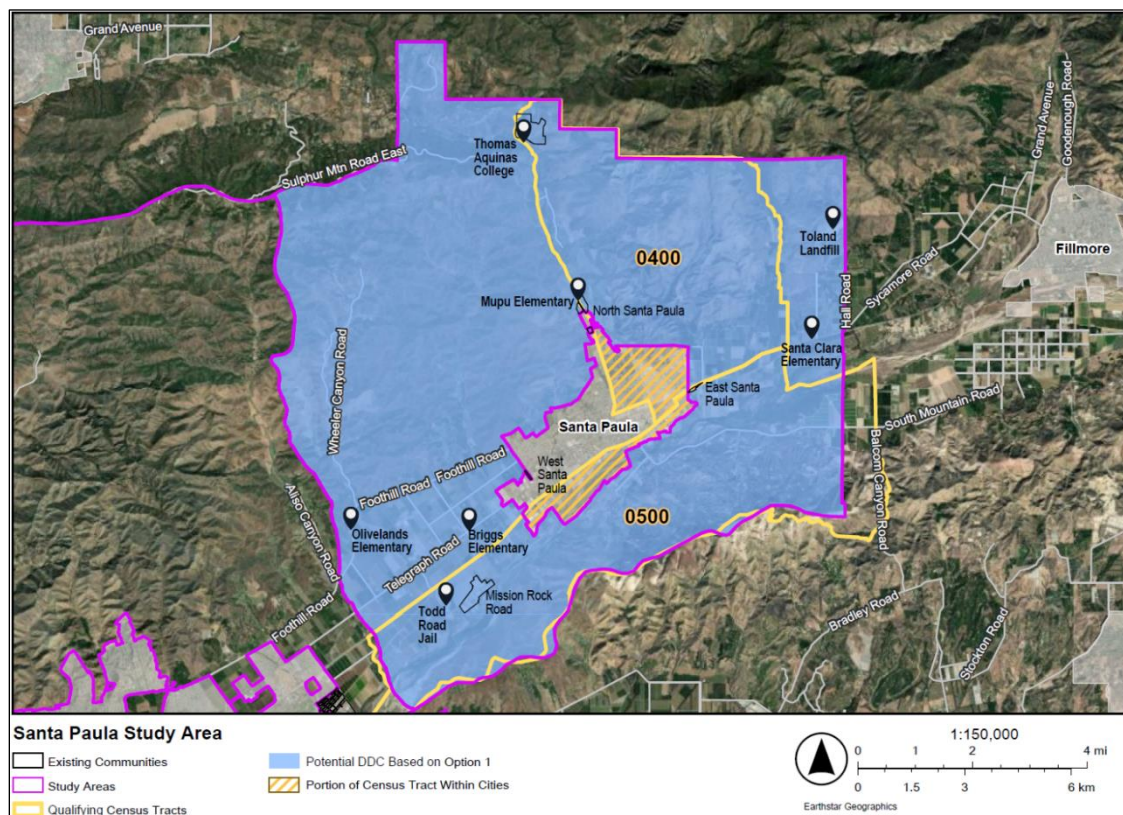


Figure 31. Potential DDCs Based on Option 1: Santa Paula Study Area



4.4 Potential DDCs Based on Option 2

Option 2 emphasizes protection of unincorporated urban enclaves that contain residential communities identified as Existing Communities in the General Plan. Option 2 is similar to the approach used by LAFCo to identify the disadvantaged unincorporated communities of Nyeland Acres, Saticoy, and Piru pursuant to SB 244 (2011)¹, which requires local governments to evaluate access to vital public services and current states of infrastructure for disadvantaged unincorporated communities. In addition, there are examples elsewhere in the state where DDCs were identified by focusing on community enclaves (see section 6.1 below). Figures 32 and 33 below depicts Option 2 in the Ventura and Santa Paula Study Areas. Refer to Appendix D for a summary table comparing all options for each Study Area. The following points should be taken into account when considering the application of Option 2:

- The Existing Community boundaries for Ventura and Santa Paula include areas beyond the qualifying census tracts. Those extended areas have scores above 75 for individual environmental pollution indicators in CalEnvir Housing, Pesticide Use, Hazardous Waste Generators and Facilities, Impaired Water Bodies, and Solid Waste Sites. These indicators are explained in further detail in the Study.
- Industrial and oil and gas operations in the Ventura Study Area would be included in a potential DDC.

¹ Disadvantaged unincorporated communities are defined in SB 244 as an area of “inhabited which the annual median household income is less than 80 percent of the statewide median household income. An area with 12 or more registered voters is considered to inhabited territory.”

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- Within the Santa Paula Study Area, large swaths of open space and agricultural lands, as well as industrial land uses would be excluded from designation.
- Within the Santa Paul Study Area, farmworker housing communities along Aliso Canyon and Wheeler Canyon, three K-12 schools, and a residential neighborhood along South Mountain Road would be excluded from designation.

Figure 32. Potential DDCs Based on Alternative Option 2: Ventura Study Area

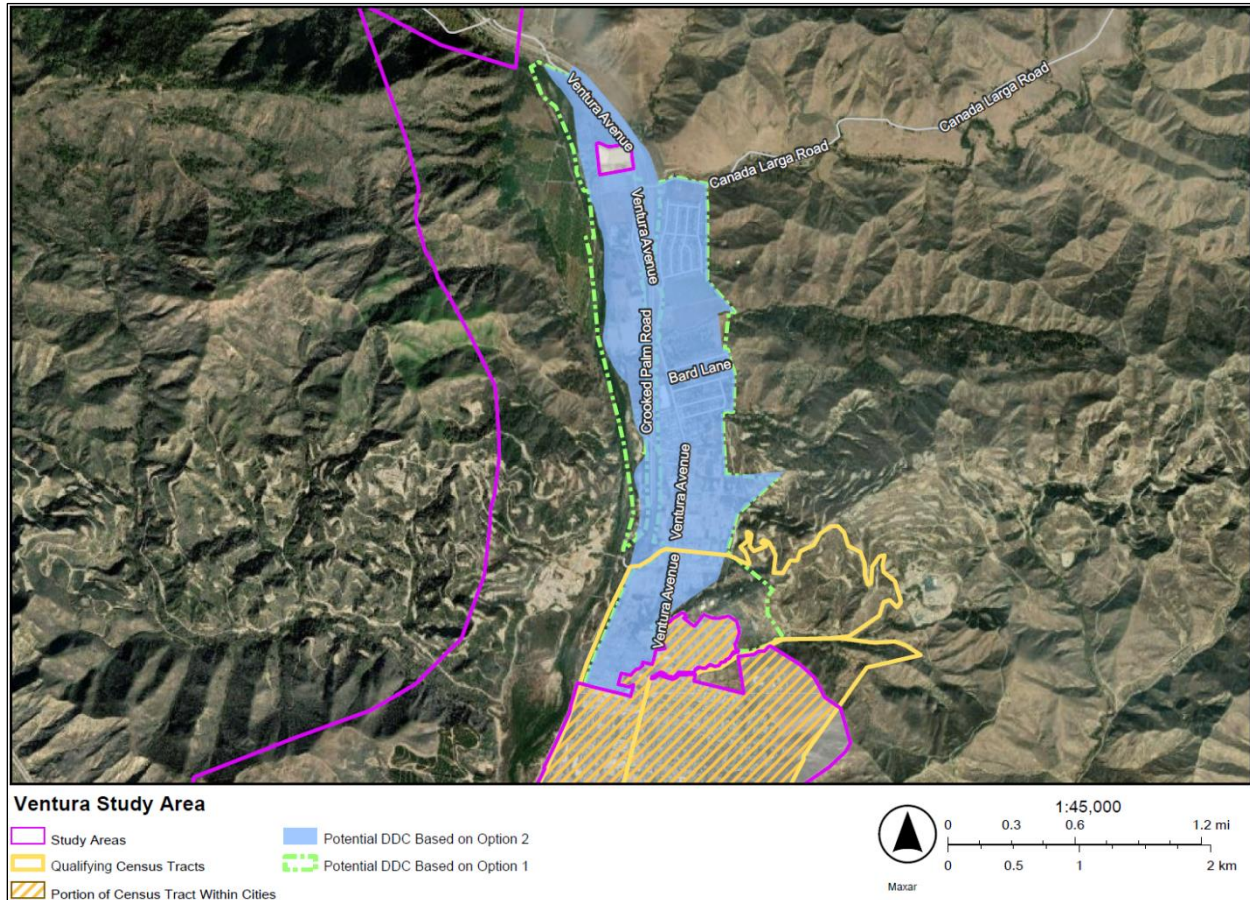
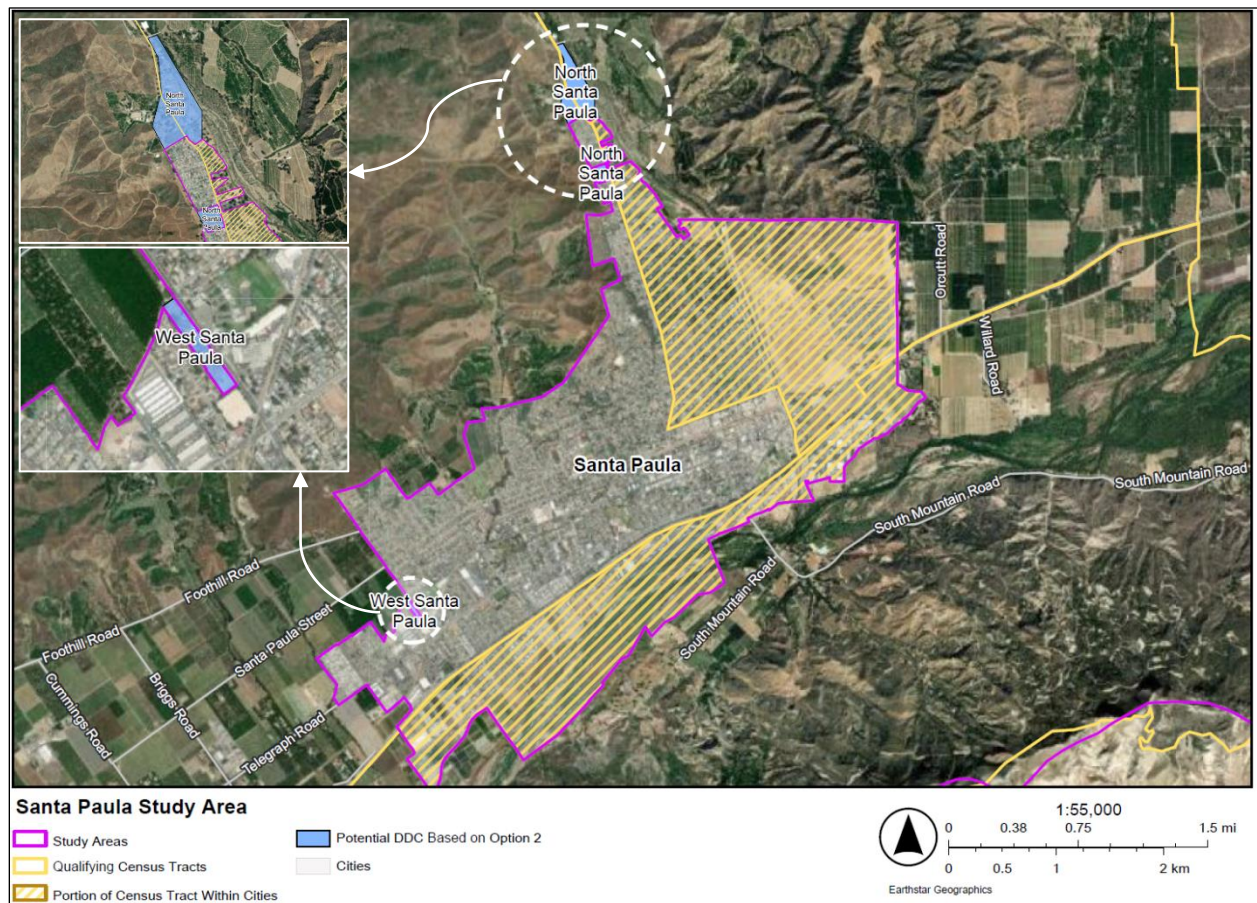


Figure 33. Potential DDCs Based on Alternative Option 2: Santa Paula Study Area



5. Public Engagement of Options 1 and 2

To better inform the research, the Planning Division engaged in public outreach on Options 1 and 2 within the Study Areas. Overall, community input provided additional localized environmental burdens, concerns, and needs that are not otherwise captured in statewide data sets such as CalEnviroScreen. Additionally, community input led to additional research and the development of Option 3, which is further explained in Chapter 6 (Development of Option 3).

5.1 Coordination and Preparation

The Planning Division coordinated with the cities of Ventura, Santa Paula, and Oxnard to address potential areas of community concerns that span across jurisdictional boundaries. The Planning Division also coordinated with other County agencies to evaluate CalEnviroScreen indicators and strategies for public outreach, including the AWM, EHD, Public Works Agency, the Public Information Office, and the office of Diversity, Equity, and Inclusion.

Public engagement materials used were prepared in consultation with County agencies as well as staff from all three cities. All materials were translated into Spanish by certified bilingual County staff and certified professional translators. The project website and PowerPoint presentations used for public outreach were available online, and all other public engagement materials were available online and in print. Quick Response (also known as QR) codes, a type of barcode that can be scanned using mobile phones to access information, were imprinted on all public engagement materials as an additional mechanism to quickly access the materials electronically. Table 9 below describes the public engagement materials that were prepared.

Table 9. Public Engagement Materials

Material	Description
Project website	Includes a project scope narrative; materials and handouts provided at public meetings; and interactive maps of the Study Areas, census tracts, CalEnviroScreen and income threshold information, and designation options. The interactive maps also enabled users to search specific addresses in relation to the Study Areas.
Project fact sheet	Includes key project information, a summary of CalEnviroScreen scores and information, ways to provide input, and a project timeline.
CalEnviroScreen fact sheet	Includes a CalEnviroScreen overview including how it identifies disadvantaged communities, its uses, and limitations.
Frequently Asked Questions (FAQ)	Responses to common questions related to the project. The FAQ was made available as a webpage, a downloadable PDF, and a hard copy.
Input Form	Allows users to provide comments on identified CalEnviroScreen indicators, any additional indicators or environmental pollution concerns that were not already addressed by CalEnviroScreen, and any additional comments that the user desires to share. Form available online and in hard copy.
Subscribe for Notifications Form	Allows users to submit an email address for future project notifications.
Posters	Large project posters were displayed at each in-person public meeting. All information was presented in English and Spanish.

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Material	Description
PowerPoint presentations	PowerPoint presentations were given at the beginning of each public meeting. The presentation slides were bilingual, and live Spanish interpretation was provided during the presentations.
Promotional Flyer	Included relevant public meeting details and brief project description.

5.2 Public Engagement Process

Before engaging with the broader community, Planning Division staff consulted with the offices of Board District 1, Board District 3, and Board District 5 and assembled a “community connectors” group. This group included 10 community stakeholders, which included community representatives from community-based organizations, nonprofit organizations, and public agencies. They were invited to a virtual workshop in August 2022 to discuss public engagement techniques that they believed would work well in the communities where staff would be conducting outreach. The following suggestions from the August 2022 workshop were implemented in public meetings conducted in March 2023:

- Virtual and in-person public meetings were held;
- In-person public meetings were held in the evening;
- Public meetings were held at family-friendly venues;
- Provided light snacks and water;
- Spanish language interpretive services, including simultaneous interpretation were made available;
- All materials were translated and made available in Spanish;
- Provided printed and electronic (online) public engagement materials;
- Provided multiple ways to engage with staff;
- Coordinated with adjacent cities; and
- Coordinated with community-based organizations to promote public meetings.

Table 10 below summarizes the public outreach process, which is explained in further detail below.

Table 10. Summary of the Public Outreach Process

Date	Event	Type of Coordination
August 29, 2022	Community Connectors Workshop	Met with a group of “Co
February 15, 2023	CAUSE Youth Meeting	Discussed project to youth members
February 22, 2023	WaterTalks Committee Meeting	Promoted the project to committee members
February 24, 2023	Publicized meeting announcements	Mailed announcements and shared a press release regarding upcoming public meetings
March 1, 2023	Westside Community Council Monthly Meeting	Promoted public meetings to council members and a public audience

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Date	Event	Type of Coordination
March 3, 2023	Publicized meeting announcements	Mailed additional announcements and promoted the public meetings on social media
March 8, 2023	Virtual Public Meeting	Held a virtual public meeting to receive public input on the project for all three Study Areas
March 10, 2023	Public Meeting in Ventura	Held in-person public meeting to receive public input on the project, focused on the Ventura Study Area
March 13, 2023	Public Meeting in Santa Paula	Held in-person public meeting to receive public input on the project, focused on the Santa Paula Study Area

On February 24, 2023, bilingual announcements of the scheduled public meetings were mailed to properties within qualifying census tracts in the Study Areas (including properties within the cities that are within 300 feet of those census tracts), and a press release announcing the meetings was also published. On March 3, posts were shared on networks to promote the public meetings and additional postcards were mailed to properties in the Ventura Study Area after request from the District 1 Board of Supervisors office.

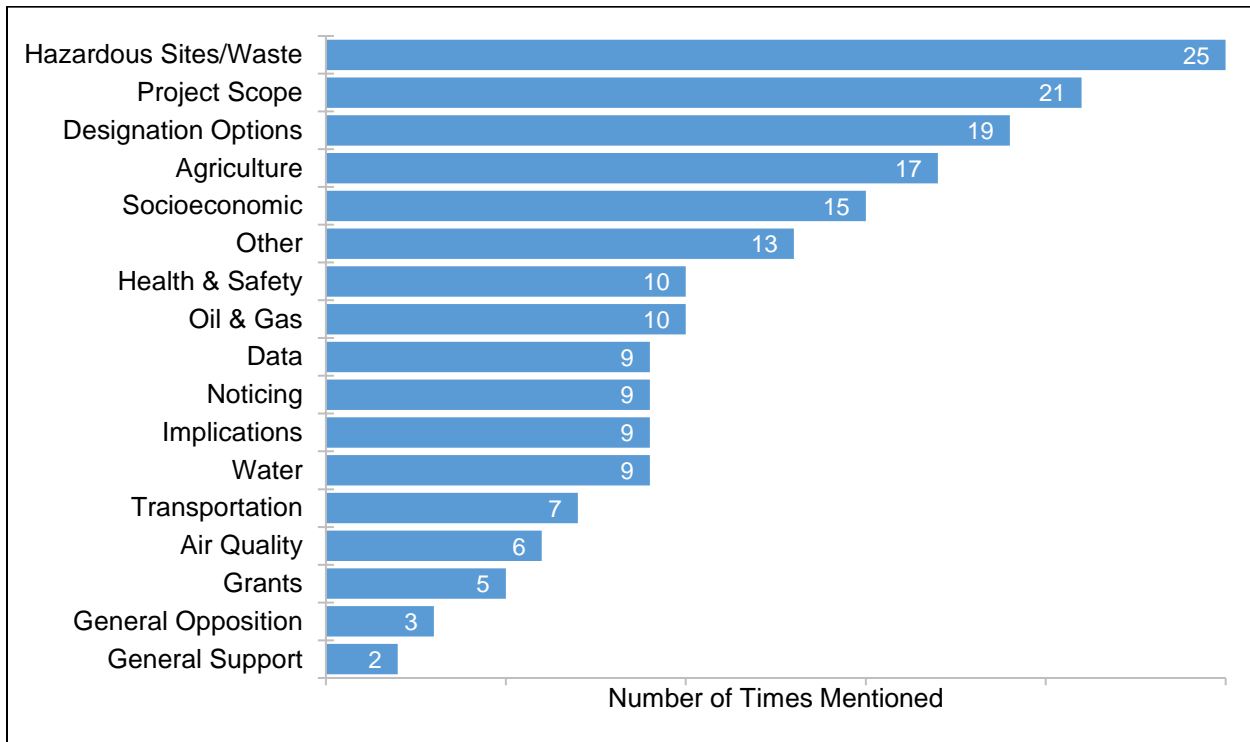
Three public meetings were held in March 2023 to discuss the project and to receive input from community members in the Study Areas. The first meeting was held virtually on Zoom and covered all three Study Areas. The second meeting was held at the Museum of Ventura County, which focused discussions on the Ventura Study Area. The third meeting was held at the Santa Paula Community Center, which focused discussions on the Santa Paula Study Area. Spanish interpretation was available for all three meetings. Public comments were collected through virtual and in-person formal questions-and-answers sessions, comment forms, and an online form accessible through the project website. The website, during presentations, and on handouts for those who wish to submit comments by mail. County staff, including several bilingual staff members were available at each in-person meeting during poster sessions to review project information and answer questions through direct interactions with community members. Planning

As summarized in Table 6 above, the public meetings were promoted through coordination with CAUSE and the Westside Community Council (in Ventura), a press release emailed to local media outlets and posted news webpage, email notifications to community stakeholders, social media posts, mailed postcards, and the project website. Notifications and promotional efforts took place up to 11 calendar days prior to the first public meeting. The press release was sent to local media outlets including the Ventura County Star, the Acorn, Santa Paula Times, Ojai Valley News, and Vida.

5.3 Public Feedback

Ninety-three distinct comments were received during the public engagement process, which are compiled in Appendix D, along with individual responses to each comment. Figure 34 below summarizes the number of times a general topic was mentioned. Overall, most of the public comments describe environmental pollution burdens experienced by local communities.

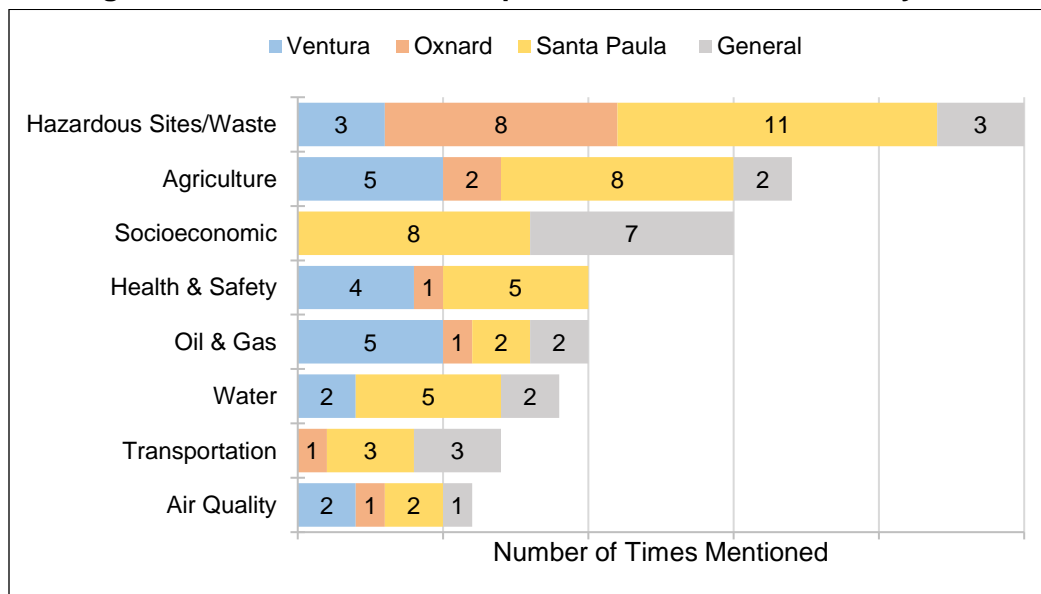
Figure 34. Topics Mentioned in Comments Received



Note: The topic includes topics that were mentioned once such as 5G towers, sea level rise, flooding, development projects within cities, airports, noise, gangs and drugs, and property values.

Figure 35 below denotes the number of times a topic related to a CalEnviroScreen environmental pollution indicator or population characteristic indicator was mentioned in comments received, classified by Study Area. The “General” encompasses comments that are not explicitly focused on a specific Study Area and are considered applicable to all areas evaluated by the Study.

Figure 35. CalEnviroScreen Topics Mentioned in Each Study Area



Study of Additional Potential Disadvantaged Community Designations

Comments regarding hazardous sites/waste were made most frequently (25 times). Other topics mentioned more than 12 times include agriculture, socioeconomic concerns, project scope, and designation options.

Several comments received inquired about the potential to implement solutions to address concerns related to environmental pollution burdens and socioeconomic disparities. In general, concerns raised are in alignment with the identified high scoring CalEnviroScreen indicators within the Study Areas. Additional concerns raised by community members include: the wellbeing of farmworkers and children; homelessness; housing conditions; the overarching environmental impacts from oil and gas operations; traffic safety and transportation infrastructure; and other concerns as described in further detail in Table 11 and in Appendix C.

Although all concerns raised by community members are acknowledged, the scope of this Study does not include implementing solutions to address such concerns. General Plan policies and programs that are intended to address environmental pollution burdens and socioeconomic disparities in disadvantaged communities are being implemented independent of this Study.

Table 11 summarizes the comments and concerns expressed by community members during the public engagement process. Responses to the topics mentioned in the comments received are summarized in the sections below.

Table 11. Comments Received During Public Engagement

Topic	Comments and Concerns Received
Hazardous Sites and Hazardous Waste or Materials	<ul style="list-style-type: none"> Inquired about specific hazardous sites in the unincorporated areas Concern for the community's health operation of these sites. Whether the sites mentioned were included in the analysis or in any of the designation options.
Agriculture	<ul style="list-style-type: none"> Concern for method of pesticide or herbicide application through sprays or aircraft near homes and water bodies. These application methods may unintentionally leave behind residues in the air and water, or travel by wind to nearby residential communities. Concern for farmworkers who may be exposed to pesticides and herbicides due to the nature of their work and/or living near agricultural fields.
Socioeconomic Concerns	<ul style="list-style-type: none"> Concern for the wellbeing of low-income and underserved community members, and schools. Importance of including schools and low-income and underserved communities, such as farmworkers, in considerations for potential disadvantaged communities. Olivelihoods School, Briggs School, Mupu Elementary School, and Santa Clara Elementary School within the unincorporated area of the Santa Paula Study Area were identified by community members. Potential gentrification as a result of prioritized improvements to public services and infrastructure within DDCs.
Health and Safety	<ul style="list-style-type: none"> Whether the disadvantaged community designation would help remove lead contaminants and popcorn ceilings. Santa Paula has high lead paint contamination due to an old housing stock. Concern for variety of health effects, such as asthma, caused by pesticide use and wildfire smoke. Insufficient fire safety infrastructure.

Study of Additional Potential Disadvantaged Community Designations

Topic	Comments and Concerns Received
	<ul style="list-style-type: none"> Concern for living conditions for the homeless, including lack of restrooms and exposure to pollution in local rivers.
Oil and Gas*	<ul style="list-style-type: none"> Concern about oil and gas operations that may affect the health of residents and impact water and air quality. Concerns about the Petrochem site, the Ventura compressor station, the Lemonwood neighborhood, and oil wells surrounding North Ventura Avenue.
Water	<ul style="list-style-type: none"> Concerns about water quality, particularly surrounding potential pollution from oil and gas operations and pesticide use. How does CalEnviroScreen water indicator scores affect the water quality in homes? Concern for homeless community members by living near rivers that could be polluted.
Transportation	<ul style="list-style-type: none"> Poor quality of streets, inadequate paths and infrastructure for horse riders, freeway smog pollution, large tractor trailer traffic, and lack of public transportation as a barrier to attending community meetings. Questions about traffic as an indicator for CalEnviroScreen.
Air Quality	<ul style="list-style-type: none"> Concerns about negative air quality effects from oil and gas operations, freeway smog, and pesticide. Inquired whether the Study considered the APCD' evaluation of communities recommended for inclusion in the Community Air Protection Program (CAPP) pursuant to AB 617.
Project Scope, Options, Data	<ul style="list-style-type: none"> Questions regarding whether certain areas were evaluated or considered in each of the designation options, as well as clarification of the project timeline. A majority of community members at the public meeting held in Santa Paula expressed support for designation Option 1 in the Santa Paula Study Area. Interested in learning more about specific CalEnviroScreen information such as pesticides, traffic, air quality, the sources of the data, CalEnviroScreen scores, and income data analyzed in the project.
Notification of Public Meetings	<ul style="list-style-type: none"> Expressed that additional notification was needed. Suggestions included publications in local media outlets, and additional time between notifications and the meetings.
Implications and Grants	<ul style="list-style-type: none"> How would the disadvantaged community designation affect existing and future oil and gas operations, as well as other industrial activities? Interested in learning more about the implications of becoming a DDC, including whether additional County resources will be directed if a community is designate and whether there are drawbacks of becoming a DDC. Questions about available grants for DDCs. How long would the designation status last once a community is designated?
Other	<ul style="list-style-type: none"> Several topics were mentioned once by community members, which include 5G towers, sea level rise, flooding, development projects within cities, airports, noise, gangs and drugs, and property values.

*Note: Responses to oil and gas concerns are addressed as part of the following topics: Hazardous Sites and Hazardous Waste or Materials, Water, and Air Quality.

5.3.1 Hazardous Sites and Hazardous Waste or Materials

The hazardous sites mentioned by community members include the following sites:

- **Petrochem site:** The Petrochem site is located along North Ventura Avenue within the Ventura Study Area. The site was the location of a petrochemical manufacturing plant and oil refinery that was in operation from the early 1950s to early 1970s. The facility was closed in the mid-1980s. Petrochem is not within a qualifying census tract. However, the facility is included in both Options 1 and 2.
- **Oil and gas fields in Ventura:** Oil and gas operations are located along the unincorporated portion of North Ventura Avenue within the Ventura Study Area. Oil and gas operations have been active since the early 1900s. Unincorporated residential areas are nestled along North Ventura Avenue near the oil and gas operations and other industrial uses. The oil and gas fields are not within qualifying census tracts. However, oil and gas operations and other industrial uses located along North Ventura Avenue are included in both Options 1 and 2. The designation options exclude the oil and gas operations and activities located in the surrounding hillside open spaces within the vicinity of North Ventura Avenue.
- **Ventura Compressor Station:** The Ventura Compressor Station is a natural gas compressor facility located within the city of Ventura at 1555 North Olive Street operated by the Southern California Gas Company, which is currently proposing to replace three existing natural gas compressors with two new electric-driven compressors and two new natural gas compressors. The facility is not within the County of Ventura jurisdiction and thus, is not included in the analysis nor the designation options within the Ventura Study Area.
- **Anterra site:** The Anterra site is an oilfield waste disposal facility located along East Wooley Road within the Oxnard Study Area. The facility was permitted to accept oilfield waste from 1998 to 2018. The facility closed in 2019 and site remedial cleanup and removal of equipment is ongoing. The Rose Park neighborhood is located northward of the facility, and the Lemonwood neighborhood is located southward of the facility. Both neighborhoods are within the city of Oxnard. The Rose Park neighborhood is identified as a disadvantaged community in the City's 2022 Housing Element. Although Anterra is within the unincorporated area of the County, it is not within a qualifying census tract.
- **Oxnard Oil Field:** This oil and gas production facility is located within the Oxnard Study Area and started operations in 1957. A total of 29 oil wells have been drilled at the facility. Seven have been plugged and abandoned and 22 are in active or idle status. Two zoning clearances allowing for the redrilling and operation of two existing oil wells under Special Use Permit 672 were approved in February 2023 by the Board of Supervisors on appeal. The Oxnard Oil Field is located within approximately 1,700 feet of the Lemonwood neighborhood in the city of Oxnard. The Lemonwood neighborhood is not identified as a disadvantaged community by the City. In addition, the Oxnard Oil Field is within the same census tract as the Anterra site, which is not a qualifying census tract.
- **Santa Clara Wastewater Treatment Facility (RI-NU):** The Santa Clara Wastewater Treatment Facility (known as the RI-NU site) is located in the unincorporated Mission Rock Road Existing Community within the Santa Paula Study Area. The facility processed oilfield brine wastewater, food processing water, industrial wastewater, and water softener regeneration waste. Facility operations are currently suspended due to a chemical explosion and fire that occurred at the facility in November 2014. An application

to reinstate facility operations was withdrawn by the applicant in July 2023. RI-NU is within qualifying census tract 0500. Census tract 0500 is included in Option 1 in the Santa Paula Study Area and is not included in Option 2.

- **Santa Susana Field Laboratory:** The Santa Susana Field Laboratory opened in 1948 and began as a research, development, and testing location for rocket engines. All operations at the site ceased in 2006. The National Aeronautics and Space Administration (NASA) acquired a portion of the site in 1973 and still manages 451 acres of the site today. The Boeing Company manages the remaining 2,399 acres. A clean-up plan addressing soil and water contamination has been developed for the site by state and federal regulators, Boeing, and NASA. Remediation activities are ongoing. The facility is not within any of the Study Areas and thus was not included in the Study.

5.3.2 Agriculture

The project EAQ's include information regarding Pesticide Use Program. This program requires County oversight of pesticide and herbicide application permits, inspections, investigations, and violations of pesticide use.

In 2022, 834 inspections and 47 investigations were conducted, which resulted in 215 citations for code violations and 180 cases where at least one pesticide use violation occurred. Of the 180 cases, enforcement action (mostly fines) was taken in 56 cases and fines are anticipated to be issued to 43 pending cases. Compliance action was taken in the remaining 81 of the 180 cases due to the minor nature of the violation and other mitigating factors, such as a good compliance record or low toxicity of the pesticide used.

5.3.3 Socioeconomic Concerns

The existing General Plan definition of a DDC includes consideration of low-income communities that are disproportionately affected by environmental pollution and other hazards. The intent of the disadvantaged community designation is to implement General Plan policies and programs intended to help address environmental and socioeconomic disparities in residential communities located within or near areas that are disproportionately burdened by environmental pollution. Some of these policies and programs are in the early stages of implementation and thus, there is not sufficient information at this time to determine whether gentrification would be a direct result of policies and programs specifically focused on DDCs.

The farmworker communities along Wheeler Canyon and Aliso Canyon, Oliveland School, Briggs School, Mupu Elementary School, and Santa Clara Elementary School and the rural communities near these schools are included in Alternative Option 1. Oliveland School, Briggs School, Santa Clara Elementary School, farmworker communities, and rural communities near these schools are not included in Alternative Option 2. Mupu Elementary School and the surrounding neighborhood are located within the North Santa Paula Existing Community, which is included in Alternative Option 2.

Questions were raised during the public outreach process regarding the potential effects of gentrification resulting from enhanced public services and infrastructure in DDCs. It is important to note that General Plan policies and programs associated with DDCs are newly adopted programs that were not previously included in the study. Thus, these policies and programs are in their early stages of implementation and will be evaluated for effectiveness over time by staff and presented to the Board.

5.3.4 Health and Safety

Census tract 0400 within the Santa Paula Study Area scored 79.89 in CalEnviroScreen for Children's Lead Risk. This tract is included in Alternative Options 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100. Public or grant-funded assistance for housing improvements, or the removal of contaminants that pose a health risk, such as lead and asbestos, are dependent on the availability of funding or programs established to achieve these specific goals.

CalEnviroScreen includes an asthma indicator which evaluates the age-adjusted rate of emergency department visits related to asthma. CalEnviroScreen asthma scores are between 26 and 54 for the census tracts evaluated in the Study. Community members can refer to Figures 18 and 25 of this Study to review areas that may be included in the Study's designation.

The Office of the State Fire Marshal (CAL-FIRE) is currently in the process of updating the high fire hazard severity zones throughout unincorporated areas of California. Further details about CAL-FIRE's map update process are available at osfm.fire.ca.gov/FHSZ/. The Ventura County Fire Department will update maps of local responsibility areas following the completion of CAL-FIRE's update, as well as implement any new and including new requirements prohibiting vegetation within five feet of structures.

5.3.5 Water

The project FAQs includes responses regarding water quality, impaired water bodies and groundwater threats. Water provided through the County's Water is safe for human consumption. Water quality reports and water management plans for districts within the Water and Sanitation Department are available at vcpublicworks.org/wsd/publicationsanddocuments/. For information on water quality provided through other water purveyors, community members are encouraged to contact their water purveyor directly. Additionally, public water systems (serving 15+ connections) are regulated by the State Division of Drinking Water, which mandates testing and annual reporting in Consumer Confidence Reports, which are available online at epa.gov/ccr. For information related to water safety within the cities of Ventura, Santa Paula, and Oxnard, please consult these cities directly.

Threats to water quality include pollution or contamination that may come from sources such as wastewater treatment plants, failing systems, urban stormwater runoff, agricultural runoff, underground storage tanks, cleanup and land disposal sites, bacterial contamination, seawater intrusion, and naturally occurring contaminants. Impaired water bodies are considered compromised for drinking, swimming, fishing, aquatic life, and other beneficial uses due to pollution or contamination of that water, which violates water quality standards. The State Water Resources Control Board administers the listing and reporting of impaired water bodies in California, as well as plans to improve these waters to rectify their impaired conditions. The most recent report of impaired water bodies can be accessed online.

Other threats to groundwater such as underground storage tanks and other facilities that handle hazardous materials or generate hazardous waste are regulated by the Ventura County Environmental Health Division, which conducts inspections of these facilities to help ensure their compliance with state and federal regulations. State and federal agencies such as the Department of Toxic Substances Control and the USEPA regulate and monitor cleanup at sites that have had significant release in the environment.

5.3.6 Transportation

CalEnviroScreen includes a traffic impact indicator which evaluates the volume of vehicles in a specified area. CalEnviroScreen traffic impact scores are between 10 and 75 for the census tracts

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evaluated in the Study, with one census tract in the Ventura Study Area scoring highest at 74.98 based on the proximity of Highway 33, which runs along the eastern edge of the tract. There are several grant opportunities that prioritize transportation infrastructure improvements that benefit disadvantaged communities. The disadvantaged community designation could help bolster grant applications for such projects, improving the likelihood of approved grant funding.

5.3.7 Air Quality

The following clarifications are provided from the CalEnviroScreen 4.0 Report:

- CalEnviroScreen includes environmental pollution indicators that evaluates potential risk of exposure to ozone and particulate matter less than 2.5 micrometers (PM 2.5), which pose the most widespread and significant health threats. Ozone in the upper atmospheric layers provides protection against ultraviolet radiation. However, ozone at ground level is harmful and is the primary component of smog. Ozone levels are typically at their highest in the afternoon and on hot days. CalEnviroScreen 4.0 compiles mean ozone concentrations in the summer seasons captured from a network of air monitoring stations in California from 2017 through 2019 to evaluate scores for its ozone indicator.
- Particulate matter is a complex mixture of aerosolized solid and liquid particles including such substances as organic chemicals, dust, allergens, and metals. These particles can come from many sources, including cars and trucks, industrial processes, wood burning, or other activities involving combustion. The composition of particulate matter depends on the local and regional sources, time of year, location, and weather. CalEnviroScreen 4.0 compiles mean PM 2.5 concentrations captured from satellite observations and a network of air monitoring stations in California from 2015 through 2017 to evaluate scores for its PM 2.5 indicator.

Regarding the census tracts evaluated in the Study, CalEnviroScreen scores for ozone are between 22 and 52, and PM 2.5 are between 16 and 37. The CARB developed the Community Air Protection Program (CAPP) to implement Assembly Bill (AB) 617, which requires CARB to take localized measures, such as air quality monitoring and emissions reduction programs, to protect communities that are disproportionately impacted by air pollution. A process to select communities is required as part of the CAPP in which local air districts submit recommendations to CARB regarding communities within their jurisdictions that should be included as part of the CAPP.

The APCD submitted its final recommendations to CARB in 2018, which included three census tracts within the Oxnard Study Area that were evaluated as part of this Study. These census tracts were selected by APCD based on its evaluation of CAPP Justice Screening and Mapping Tool (EJScreen), APCD information on permitted facilities in and nearby communities at risk as identified in CalEnviroScreen and EJScreen, and public input from public workshops held in 2018. In addition, APCD identified other communities it plans to continue working with in implementing AB 617, including one census tract within the Ventura Study Area and two census tracts within the Santa Paula Study Area that were evaluated as part of this Study. To date, CARB has not officially included APCD's

The census tracts within the Oxnard Study Area have CalEnviroScreen 4.0 ozone and PM 2.5 indicator scores between 24 and 37. Although these census tracts are not included in the designation options as outlined in the Study, nearby unincorporated areas within the Oxnard Study Area that meet the criteria of the designation options are already located within the existing El Rio/Del Norte DDC. The census tracts within the Ventura and Santa Paula Study Areas have CalEnviroScreen 4.0 ozone and PM 2.5 indicator scores between 17 and 60. Portions of the census tract within the Ventura Study Area are included in designation boundary Options 1 and

2, and the census tracts within the Santa Paula Study Area are included in their entirety in designation boundary Option 1.

5.3.8 Project Scope, Options, and Data

Refer to Chapter 4 (Designation Options) for a comprehensive discussion of the options explored to identify potential DDC boundaries. As noted above in Chapter 3 (Data Evaluation), CalEnviroScreen categorizes statewide and federal data into 21 indicators of pollution burdens and population characteristics, and calculate scores that indicate the level of pollution burden compared among all census tracts in California. Information compiled in CalEnviroScreen is available at a statewide level and does not include local community information such as local inspections, investigations, complaints, enforcement actions, or individual accounts or experiences of environmental pollution. Public engagement was conducted to better inform the analysis with local information and community input. During the public meetings, staff referred to handouts and resources where community members can learn more about CalEnviroScreen and its data sources. Responses to questions related to specific environmental pollution information are addressed in the Study and in the responses to comments in Appendix C.

5.3.9 Notification of Public Meetings

Refer to the extensive efforts made to promote the project and public meetings as explained earlier in this Chapter.

5.3.10 Implications and Grants

The benefits and drawbacks of being a DDC, including implications for grants, are discussed in further detail in Section 4.6 of this Study.

5.3.11 Other

One comment mentioned sea level rise and related flooding. The County of Ventura is actively planning for sea level rise to protect coastal resources and to minimize impacts to residents, businesses, and visitors through the Ventura County Resilient Coastal Adaptation Project (VC Resilient). A Vulnerability Assessment was completed in 2018 as part of Phase I of the VC Resilient project, which highlights potential impacts using three different sea level rise scenarios across the entire unincorporated county coastline. The Vulnerability Assessment includes analysis of sea level rise projections out to the year 2100. Phase II began in 2020, which includes more detailed technical analyses, coordination with County staff in various departments, and additional public outreach.

One comment mentioned the Santa Paula airport, which is a privately owned, public use airport within the City of Santa Paula. Projects within cities are not within the regulatory jurisdiction of the County of Ventura. Community members are encouraged to contact the city government agency in which the project is located, or specifically the City of Santa Paula regarding the Santa Paula Airport.

The General Plan zoning ordinances include policies regulating noise and wireless communication facilities. Community members can report activities in unincorporated areas that violate these policies by contacting the appropriate County agency (a list of County agencies is available online at vcrma.org/en/make-a-complaint). For reports of illegal activities related to gangs and drugs, contact the Ventura County Sheriff's Office or the local police department.

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During public outreach, members of the public also expressed concerns about potential negative impacts on property values. Based on staff's research in the Assessor's office, the disadvantaged community designation is not incorporated into property deeds.

6. Development of Option 3

In consideration of the public input received, the Planning Division conducted further research and analysis, which resulted in the development of a third option (Option 3) to identify potential disadvantaged communities as explained below. As detailed in section 2.4.1 and Appendix B, General Plan policies that address environmental pollution burdens and socioeconomic disparities in DDCs are focused on people living and working in disadvantaged communities. These policies would be better applied to residential areas and schools as compared to large acreages of agricultural lands and open space included in Options 1 and 2.

6.1 Review of Other Jurisdictions and their Disadvantaged Communities

Planning Division staff researched several other counties and cities that have adopted, or are in the process of updating, their General Plans to determine how those jurisdictions identified disadvantaged communities. Table 12 below summarizes this research. Overall, among the jurisdictions reviewed, designations of disadvantaged communities typically focus on enclaves or concentrations of residential communities that are located within CalEPA designated SB 535 census tracts. For example, counties such as Fresno, Kern, and Tulare (i.e., those with large areas of rural and agricultural land uses similar to Ventura County), have not designated large areas of open space, agricultural, or industrial settings that may be included in CalEPA designated SB 535 census tracts.

Similar to staff assessments of Ventura County, some of these jurisdictions have also identified additional disadvantaged communities within the vicinity of CalEPA designated SB 535 census tracts based on public engagement efforts and localized data.

Table 12. Disadvantaged Communities in Other Counties and Cities

Agency	Status of General Plan Update	Identified Disadvantaged Communities within CalEPA Designated SB 535 Census Tracts ¹	Identified Disadvantaged Communities in Addition to CalEPA Designated Census Tracts Based on Other Information ²
Fresno County	In progress	✓	✓
Kern County	In progress	✓	✓
Riverside County	Adopted	✓	
Santa Barbara County	In progress	✓	✓
San Bernardino County	Adopted	✓	
Tulare County	In progress	✓	✓
City of Oxnard	Adopted ³	✓	
City of Palmdale	In progress		✓
City of Petaluma	In progress		✓
City and County of San Francisco	Adopted		✓
City of South San Francisco	Adopted		✓

Agency	Status of General Plan Update	Identified Disadvantaged Communities within CalEPA Designated SB 535 Census Tracts ¹	Identified Disadvantaged Communities in Addition to CalEPA Designated Census Tracts Based on Other Information ²
¹ Disadvantaged community boundaries in the respective jurisdictions that are identified within CalEPA Designated SB 535 census tracts may be based on Specific Plan or Area Plan boundaries, other land use planning conventions established by the agency, or block group subsets of census tracts. ² Other information may include low-income thresholds, local input and local-level technical data, or SB 244. ³ The City of Oxnard identified disadvantaged communities within the context of its 2021-2029 Housing Element. See Figure 29 in Section 4.2 for more details.			

6.2 Potential DDCs Based on Option 3

The development of Option 3 represents the culmination of high scores of individual CalEnviroScreen environmental pollution indicators, input received during public engagement, use of geographic information systems mapping, research conducted on disadvantaged community identification practices used in other jurisdictions statewide, local county information, and site visits conducted by Planning Division staff. Notably, Option 3 does not include large, sparsely populated areas of open space and agricultural lands and includes key areas in the Oxnard Study Area that are not otherwise included in the first two options (see Appendix D).

Option 3 encompasses the following land uses and developments with the identified potential disadvantaged communities within all three Study Areas (see also Figures 36 through 38 below):

- Two neighborhoods and two mobile home parks in the Ventura Study Area (also identified under Options 1 and 2), collectively identified as the North Ventura Avenue DDC.
- Within the Santa Paula Study Area, the farmworker housing communities along Aliso Canyon and Wheeler Canyon (also identified under Option 1); K-12 schools including Oliveland, Briggs, and Santa Clara (also identified under Option 1); and a residential neighborhood along South Mountain Road (also identified under Option 1). These areas are collectively identified as the Santa Paula Unincorporated DDC.
- Three mobile home parks, one farmworker housing community, and Laguna Vista School in the Oxnard Study Area (not identified under Options 1 and 2), collectively identified as the Oxnard Plain DDC.

It is important to note that Option 3 deviates from the previous methodology used to identify the existing DDCs in the General Plan for the Saticoy, El Rio/Del Norte, and Piru areas. Additional analysis would be needed to re-evaluate the adopted DDCs for the El Rio/Del Norte and Piru areas using the methodology applied in Option 3, which is currently not within the scope of this Study.¹ This re-evaluation could be conducted under General Plan Program LU-R, which requires the County to review and update DDCs every five years as CalEnviroScreen and income data change. The first review pursuant to Program LU-R is anticipated in 2025.

¹ Saticoy is classified by the State of California as a “severely economically distressed community” pursuant to Health and Safety Code Sec. 116760.2 with a median household income of less than 60 percent of the statewide median income (see [Section 4.4 of the General Plan](#) for more details). Given Saticoy’s unique economic conditions and status under Health and Safety Code Sec. 116760.2, no changes are recommended for the adopted DDC boundary for Saticoy.

Figure 36. Potential DDCs Based on Alternative Option 3: Ventura Study Area

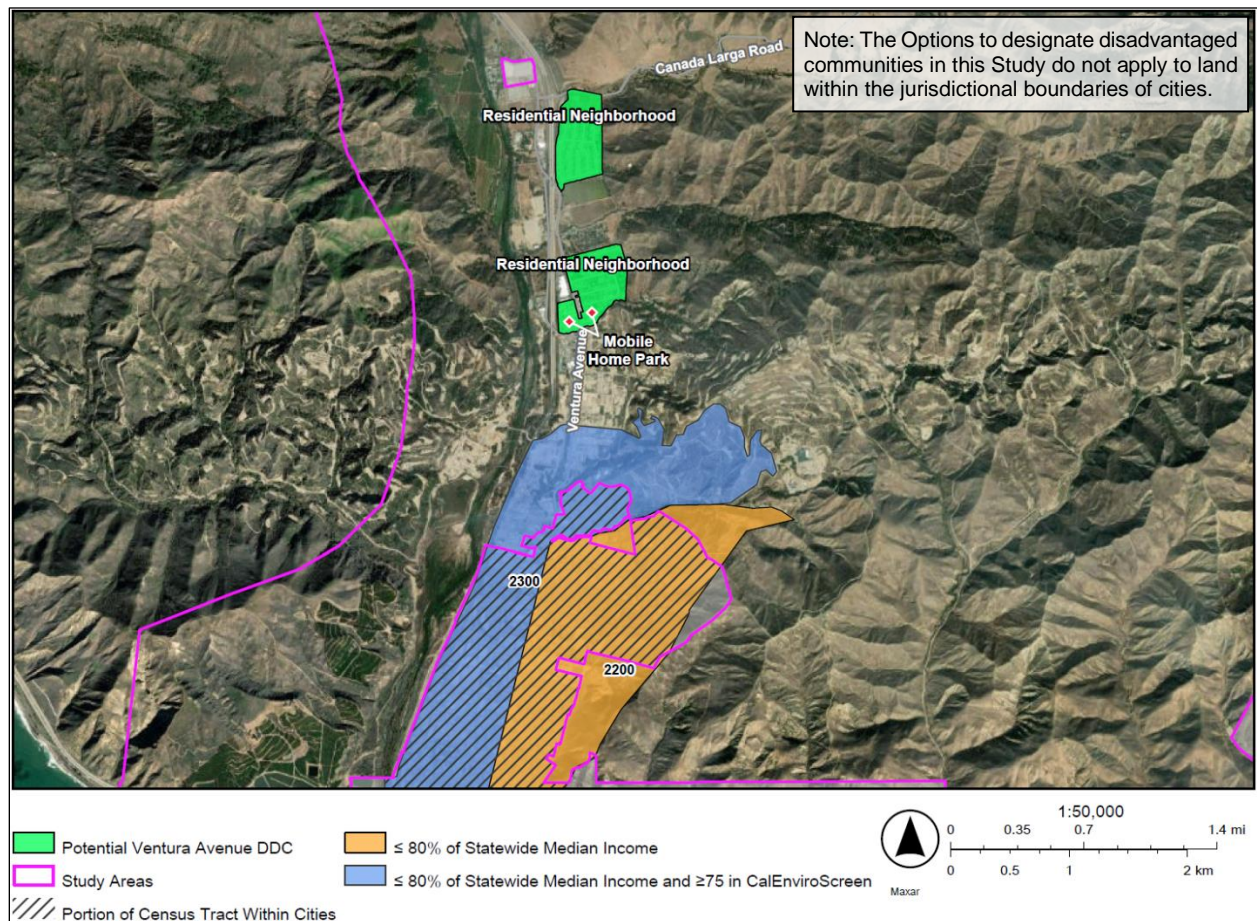


Figure 37. Potential DDCs Based on Alternative Option 3: Santa Paula Study Area

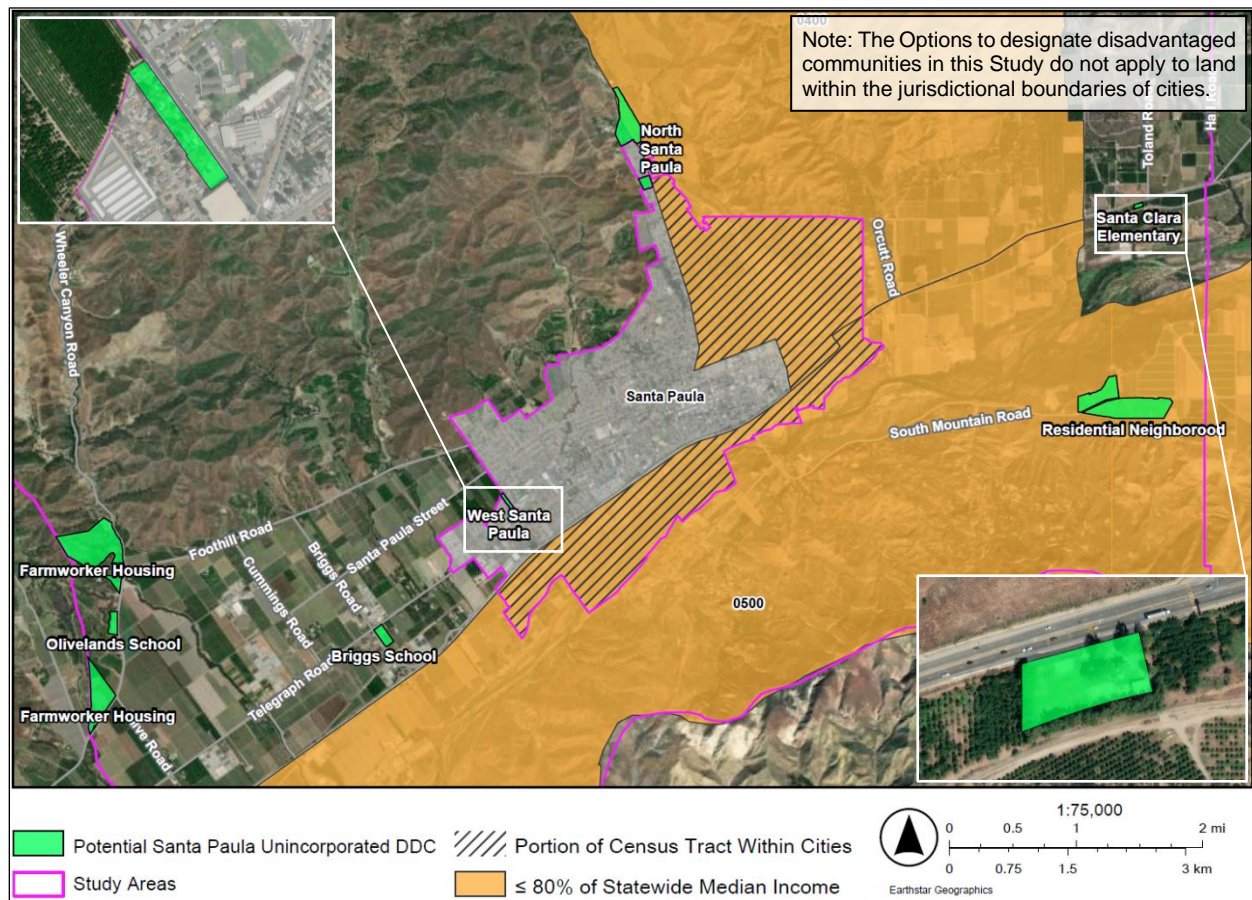
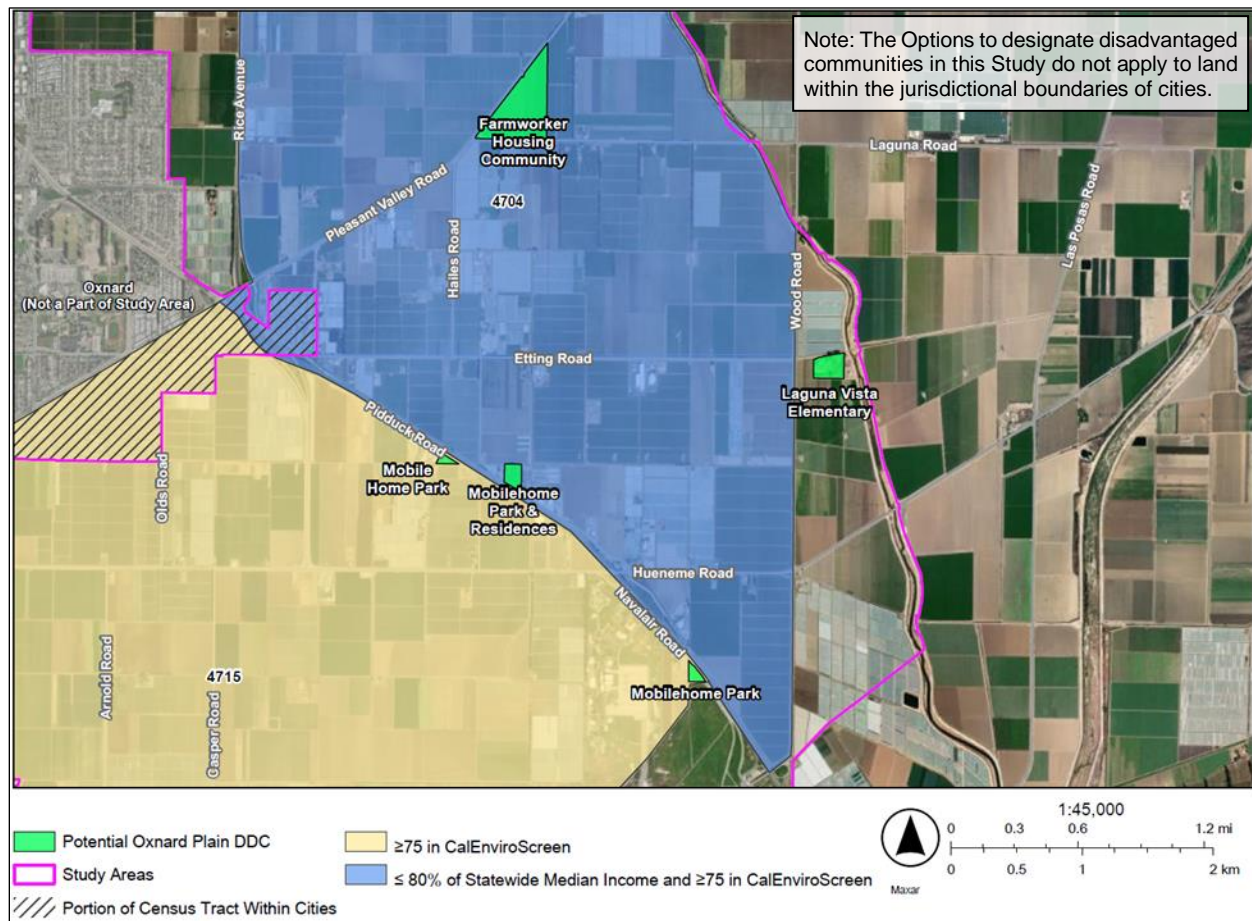


Figure 38. Potential DDCs Based on Alternative Option 3: Oxnard Study Area



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Appendix A

Census Tracts Within Each Study Area

This appendix summarizes all the census tracts within each Study Area, their respective income levels as compared to the statewide median levels from the California Department of Housing and Community Development (HCD) and the United States Census Bureau; CalEnviroScreen overall score, overall pollution burden score, overall population characteristics score; and the top three CalEnviroScreen indicators. Although not all scores of the top three indicators shown may be at or above 75, these indicators may help contextualize issues that may be of concern for communities within the census tract.

Study Area	Census Tract (2010)	Median Household Income (2019)	80% Below HCD Statewide Median (2019)?	80% Below US Census Statewide Median (2019)?	CalEnviroScreen 4.0 Scores			Top 3 CalEnviroScreen Indicators
					Overall	Pollution Burden	Population Characteristics	
Ventura, Santa Paula	0902	\$99,375	NO	NO	19.69	38.87	14.75	Pesticides: 57.55 Impaired Water Bodies: 86.96 Housing Burden: 66.07
Ventura	1204	\$78,818	NO	NO	31.14	69.35	16.67	Lead: 81.12 Hazardous Waste: 77.23 Impaired Water Bodies: 77.30
Ventura	1206	\$69,408	NO	NO	NA	79.27	NA	Pesticides: 88.45 Impaired Water Bodies: 90.13 Solid Waste: 79.95
Ventura	2000	\$100,758	NO	NO	11.84	27.34	9.80	Diesel PM: 77.29 Drinking Water: 66.54 Groundwater Threats: 82.90
Ventura	2300	\$51,989	YES	YES	82.90	86.91	70.06	Pesticides: 96.97 Groundwater Threats: 89.61 Educational Attainment: 89.72
Ventura	2200	\$55,000	YES	YES	60.05	56.52	55.89	Groundwater Threats: 91.12 Hazardous Waste: 87.33 Housing Burden: 88.66
Ventura	1900	\$84,844	NO	NO	19.16	27.99	17.86	Drinking Water: 65.18 Lead: 78.15 Groundwater Threats: 87.88

Study of Additional Potential Disadvantaged Community Designations

Study Area	Census Tract (2010)	Median Household Income (2019)	80% Below HCD Statewide Median (2019)?	80% Below US Census Statewide Median (2019)?	CalEnviroScreen 4.0 Scores			Top 3 CalEnviroScreen Indicators
					Overall	Pollution Burden	Population Characteristics	
Ventura	1001	\$78,056	NO	NO	11.60	26.07	9.96	Lead: 55.26 Impaired Water Bodies: 58.69 Solid Waste: 77.62
Ventura	1800	\$122,344	NO	NO	5.51	9.77	7.43	Drinking Water: 65.54 Hazardous Waste: 52.64 Unemployment: 65.63
Ventura	1700	\$122,000	NO	NO	2.04	5.79	3.63	Ozone: 35.27 Drinking Water: 65.29 Hazardous Waste: 35.62
Santa Paula, Oxnard	0500	\$53,558	YES	YES	74.94	80.58	62.82	Pesticides: 95.69 Hazardous Waste: 88.64 Impaired Water Bodies: 96.26
Santa Paula, Oxnard	5100	\$102,868	NO	NO	50.96	76.38	34.22	Drinking Water: 98.34 Pesticides: 97.00 Impaired Water Bodies: 99.03
Santa Paula	0903	\$76,916	NO	NO	13.87	15.93	17.49	Ozone: 65.72 Pesticides: 55.14 Unemployment: 62.40
Santa Paula	0303	\$86,500	NO	NO	31.82	36.84	29.99	Pesticides: 84.38 Solid Waste: 72.39 Educational Attainment: 74.80
Santa Paula	0400	\$62,297	YES	YES	49.79	40.76	52.48	Lead: 79.89 Hazardous Waste: 74.73 Educational Attainment: 83.80
Santa Paula	0304	\$75,200	NO	NO	50.13	42.33	51.53	Solid Waste: 92.90 Linguistic Isolation: 77.14 Housing Burden: 84.63
Santa Paula	0800	\$78,434	NO	NO	55.53	53.42	52.13	Pesticides: 85.21 Hazardous Waste: 81.15 Impaired Water Bodies: 90.13
Oxnard (Point Mugu Naval Base)	4600	\$48,155	YES	YES	55.76	87.01	33.93	Groundwater Threats: 99.92 Impaired Water Bodies: 99.85 Housing Burden: 99.72

Study of Additional Potential Disadvantaged Community Designations

Study Area	Census Tract (2010)	Median Household Income (2019)	80% Below HCD Statewide Median (2019)?	80% Below US Census Statewide Median (2019)?	CalEnviroScreen 4.0 Scores			Top 3 CalEnviroScreen Indicators
					Overall	Pollution Burden	Population Characteristics	
Oxnard (El Rio/Del Norte)	5002	\$46,579	YES	YES	74.12	78.25	63.54	Pesticides: 99.79 Educational Attainment: 99.14 Poverty: 97.47
Oxnard (El Rio/Del Norte)	5003	\$58,603	YES	YES	78.68	75.37	72.42	Lead: 93.18 Pesticides: 99.86 Educational Attainment: 93.86
Oxnard	4717	\$74,118	NO	NO	68.34	51.21	73.42	Pesticides: 99.21 Educational Attainment: 95.79 Linguistic Isolation: 86.13
Oxnard	2800	\$76,250	NO	NO	41.72	95.17	15.66	Pesticides: 99.34 Hazardous Waste: 86.84 Impaired Water Bodies: 91.87
Oxnard	4716	\$80,417	NO	NO	72.82	77.06	62.00	Pesticides: 100.00 Hazardous Waste: 90.75 Educational Attainment: 86.03
Oxnard	3609	\$102,526	NO	NO	40.31	62.15	28.18	Drinking Water: 72.76 Pesticides: 98.48 Cleanup Sites: 69.52
Oxnard	5004	\$99,071	NO	NO	53.77	70.60	39.95	Pesticides: 98.21 Traffic: 89.31 Hazardous Waste: 72.59
Oxnard	2901	\$94,063	NO	NO	47.54	45.15	45.94	Drinking Water: 72.46 Pesticides: 98.45 Unemployment: 67.48
Oxnard	1402	\$95,938	NO	NO	18.76	30.91	16.11	Drinking Water: 65.27 Pesticides: 98.41 Unemployment: 58.36
Oxnard	2905	\$98,750	NO	NO	66.81	90.83	43.49	Pesticides: 99.69 Groundwater Threats: 93.74 Impaired Water Bodies: 94.56
Oxnard	4902	\$57,469	YES	YES	91.75	92.56	79.61	Pesticides: 99.76 Impaired Water Bodies: 97.52 Educational Attainment: 98.37

Study of Additional Potential Disadvantaged Community Designations

Study Area	Census Tract (2010)	Median Household Income (2019)	80% Below HCD Statewide Median (2019)?	80% Below US Census Statewide Median (2019)?	CalEnviroScreen 4.0 Scores			Top 3 CalEnviroScreen Indicators
					Overall	Pollution Burden	Population Characteristics	
Oxnard	4704	\$59,000	YES	YES	76.03	87.07	58.93	Pesticides: 99.97 Impaired Water Bodies: 97.52 Poverty: 84.91
Oxnard	4715	\$70,521	NO	NO	85.70	94.00	66.28	Pesticides: 99.62 Toxic Release: 94.26 Impaired Water Bodies: 97.52
Oxnard	5600	\$84,832	NO	NO	45.68	93.85	19.62	Pesticides: 97.66 Hazardous Waste: 92.52 Impaired Water Bodies: 99.98
Oxnard	3612	\$89,787	NO	NO	43.66	66.67	30.21	Diesel PM: 90.35 Groundwater Threats: 96.31 Unemployment: 89.93

Appendix B

General Plan Goals, Policies & Programs Related to Designated Disadvantaged Communities

Note: Each goal, policy, or program may be applicable to multiple categories as described in the table below (e.g., a policy may include both Noticing & Outreach and Coordination & Collaboration).

Category	Description	Total Count
Siting & Development	Goals, policies, and/or programs that relate to the siting and development of future projects within designated disadvantaged communities.	15
Noticing & Outreach	Goals, policies, and/or programs that relate to noticing and educational and outreach needs for designated disadvantaged communities.	8
Services & Infrastructure Investment	Goals, policies, and/or programs that relate to the development or enhancement of County-provided public services and infrastructure within designated disadvantaged communities.	17
Coordination & Collaboration	Goals, policies, and/or programs that relate to the coordination and collaboration efforts between the County and other public entities, private entities, the public, and other stakeholders to increase equity and consider the needs of designated disadvantaged communities.	20
Planning & Policymaking	Goals, policies, and/or programs that relate to developing plans and policies with a focus on designated disadvantaged communities.	14

Study of Additional Potential Disadvantaged Community Designations

General Plan Goals

Total Goal Count: 2

GP Element	#	Goal	Description	Implementation Timing	Siting & Development	Noticing & Outreach	Services & Infrastructure Investment	Coordination & Collaboration	Planning & Policymaking
Land Use (LU)	17	Goal	Within designated disadvantaged communities, to plan for and provide public facilities, services, and infrastructure that provide fair treatment and quality of life to all people regardless of race, color, national origin, or income.				<div></div>		<div></div>
LU	18	Goal	To promote meaningful dialogue and collaboration between members of designated disadvantaged communities and decision-makers to advance social and economic equity.			<div></div>		<div></div>	

General Plan Policies












Total Policy Count: 32

GP Element	#	Policy	Description	Implementation Timing	Siting & Development	Noticing & Outreach	Services & Infrastructure Investment	Coordination & Collaboration	Planning & Policymaking
LU	1.7	Safe and Sanitary Homes Education and Outreach	The County shall engage with agencies, non-profit organizations, landlords, property owners and tenants in Disadvantaged Communities to disseminate information to educate about indoor mold and lead hazards, methods for reduction, and prevention.			<div></div>		<div></div>	
LU	17.1	Providing Equitable Public Services	Within designated disadvantaged communities, the County shall consider environmental justice issues as they relate to the equitable provision of public services and infrastructure such as parks, recreational facilities, community gardens, public safety facilities, and other beneficial uses that improve the overall quality of life.				<div></div>		
LU	17.2	Siting of Uses	Within designated disadvantaged communities, the County shall consider environmental justice issues as they relate to potential health impacts associated with land use decisions to reduce the adverse health effects of hazardous materials, industrial activities, and other uses that may negatively impact health or quality of life for affected county residents.		<div></div>		<div></div>		
LU	17.3	Environmental Protection	The County shall apply environmental protection measures equally among geographic and socioeconomic sectors within designated disadvantaged communities of the county.		<div></div>		<div></div>		
LU	17.4	New Incompatible Land Uses	The County shall not approve new discretionary projects within or in the immediate vicinity of existing residential areas, especially designated disadvantaged communities, introducing a new incompatible land use that could have substantial adverse health impact s o n a n a r e a ' s		<div></div>				












Study of Additional Potential Disadvantaged Community Designations

GP Element	#	Policy	Description	Implementation Timing	Siting & Development	Noticing & Outreach	Services & Infrastructure Investment	Coordination & Collaboration	Planning & Policymaking
LU	17.5	Placement of New Residential Uses	Within designated disadvantaged communities, the County shall discourage the establishment of new residential and other sensitive land uses near incompatible industrial land uses unless appropriate mitigations or design consideration can be included.		<input type="checkbox"/>				
LU	17.6	Negative Impacts from Potential Hazards	Within designated disadvantaged communities, the County shall work to reduce or prevent negative impacts associated with environmental hazards, including industrial and roadway generated pollution, to people who are living and working in close proximity to these uses.		<input type="checkbox"/>		<input type="checkbox"/>		
LU	17.7	Brownfield Remediation	Within designated disadvantaged communities, the County shall promote the remediation and reuse of contaminated brownfield sites to spur economic development, expand natural open spaces and parks, community gardens, and other similar health-promoting community revitalization activities.		<input type="checkbox"/>		<input type="checkbox"/>		
LU	17.8	Limit Concentrations of Unhealthy Food Providers	Within designated disadvantaged communities, the County shall encourage f a r m markets and healthier food options within neighborhoods or near child-oriented uses (e.g., schools, family day care, parks).				<input type="checkbox"/>		
LU	18.1	Communication Channels	Within designated disadvantaged communities, the County shall continue to improve communication channels and methods for meaningful dialogue between community members and decision-makers, including County staff and elected and appointed representatives.			<input type="checkbox"/>		<input type="checkbox"/>	
LU	18.2	Input on Proposed Planning Activities	Within designated disadvantaged communities, the County shall facilitate opportunities for community members and stakeholders to provide meaningful and effective input on proposed planning activities early on and continuously throughout the public review process.			<input type="checkbox"/>		<input type="checkbox"/>	
LU	18.3	Times and Locations of Public Engagement Opportunities	Within designated disadvantaged communities, the County shall aim to hold meetings, workshops, and other public engagement opportunities at times and locations that make it convenient for community members to attend, particularly stakeholders who are the most likely to be directly affected by the outcome.			<input type="checkbox"/>			
LU	18.4	Variety of Public Communication Methods	Within designated disadvantaged communities, the County shall continue to share public information across a variety of media, technological, and traditional platforms, and languages based on the demographics of the community.			<input type="checkbox"/>			
LU	18.5	Participation in Climate Change Planning	The County shall encourage stakeholders in designated disadvantaged communities who are vulnerable to sea level rise or other climate change impacts to have the opportunity to learn about and participate in the decision-making process for adaptation planning within Ventura County.			<input type="checkbox"/>		<input type="checkbox"/>	







Study of Additional Potential Disadvantaged Community Designations

GP Element	#	Policy	Description	Implementation Timing	Siting & Development	Noticing & Outreach	Services & Infrastructure Investment	Coordination & Collaboration	Planning & Policymaking
Housing Element (HE)	1.1	Ensure Housing Meets Basic Standards	The County shall support its Code Compliance Division in responding to complaints and ensuring that existing housing meets public health, safety, fire and other applicable development codes and standards, with priority given to designated disadvantaged communities.						
HE	2.2	Increase Housing Opportunities within Area Plan Boundaries	<p>The County shall pursue the following policies in Area Plan updates to increase housing opportunities.</p> <ul style="list-style-type: none">Identify opportunities to rezone more properties to Residential Planned Development to encourage the development of diverse housing types, such as: duplexes, triplexes, fourplexes, courtyard buildings, bungalow courts, cottage housing, townhouses, multiplexes, accessory dwelling units, and live/work buildings that provide affordable housing options.Identify opportunity sites for higher density housing near job clusters and transit stops to support h o population.Identify County surplus land that can accommodate residential development and consider re-designation, if feasible.Enhance existing residential areas by seeking opportunities and funding sources for public infrastructure improvements such as installing sidewalks and other pedestrian networks, bicycle facilities, neighborhood parks, and planting street trees, with priority given to designated disadvantaged communities. <p><i>Program “F” in the Land Use Element identifies a schedule for comprehensive Area Plan Updates between 2020-2040.</i></p>						
Public Facilities, Services, and Infrastructure (PFS)	1.4	Collaboration on Infrastructure and Public Service Deficiencies	The County shall collaborate with the cities in Ventura County, neighboring jurisdictions, special districts, and regional agencies to address issues of mutual interest and concern, including infrastructure and public service deficiencies, particularly in Designated Disadvantaged Communities.						
PFS	1.6	Capital Improvements Prioritizations	The County shall prioritize non-emergency capital improvement projects that provide the greatest benefit to county residents, including repairing or replacing inadequate facilities; updating or upgrading aging facilities and structures that exceed their planned lifecycles; protecting sensitive resources; and addressing deficiencies in Designated Disadvantaged Communities.						
PFS	5.1	Solid Waste Facility Location	The County shall require new landfills and other solid waste processing and disposal facilities (including facilities for composting, green waste, food waste) to be sited in areas that do not pose health and safety risks to residents and groundwater resources. The County shall require such facilities to be located based on objective criteria that do not disproportionately impact Designated Disadvantaged Communities						
PFS	7.7	Community Microgrids	The County shall collaborate with renewable energy developers, community choice aggregation programs, and local serving entities to develop solar generation plus energy storage at critical facilities and community microgrids						

Study of Additional Potential Disadvantaged Community Designations





GP Element	#	Policy	Description	Implementation Timing	Siting & Development	Noticing & Outreach	Services & Infrastructure Investment	Coordination & Collaboration	Planning & Policymaking
			for resilience during power outages with a priority in designated disadvantaged communities.						
Conservation and Open Space (COS)	3.2	Tree Canopy	The County shall encourage the planting of trees and the protection of existing urban forests and native woodlands, savannahs, and tree canopy throughout the county, including along State or County designated scenic roadways and in residential and commercial zones throughout the county, especially those located within designated disadvantaged communities.						
Hazards and Safety Element (HAZ)	5.2	Hazardous Materials and Waste Management Facilities	The County shall require discretionary development involving facilities and operations which may potentially utilize, store, and/or generate hazardous materials and/or wastes be located in areas that would not expose the public to a significant risk of injury, loss of life, or property damage and would not disproportionately impact Designated Disadvantaged Communities.						
HAZ	5.8	Siting Criteria for Hazardous Waste Generators	The County shall require commercial or industrial uses which generate, store, or handle hazardous waste and/or hazardous materials to locate, operate, and maintain hazardous waste and/or hazardous materials in a manner that does not endanger public health and safety and is located based on objective criteria that do not disproportionately impact Designated Disadvantaged Communities.						
HAZ	11.3	Limit Impacts of Climate Change on Designated Disadvantaged Communities	The County shall work with public, private, and nonprofit partners to limit impacts of climate change on Designated Disadvantaged Communities by focusing planning efforts and interventions on communities with the highest need and ensuring representatives of these communities have a role in the decision-making process for directing climate change response.						
HAZ	11.4	Education and Outreach on Effects of Climate Change	The County shall support efforts of agencies and organizations that provide effective education and outreach to Designated Disadvantaged Communities on the effects of climate change, including increasing temperatures, wildfires, flooding, sea level rise, poor air quality, extreme weather events, disease prevention, and other public health effects						
HAZ	11.6	Accessible Cooling Centers	The County shall expand partnerships with local governments, non-government organizations, churches, and businesses to provide additional cooling centers, particularly in designated disadvantaged communities.						
Economic Vitality (EV)	1.2	County Investment Priorities	The County shall prioritize investment in infrastructure, services, safety net programs and other assets that are critical to future economic vitality, including public safety, healthcare, library services, water supply and quality, transportation, energy, and environmental resources. This investment shall consider equity in investment opportunities to designated disadvantaged communities, including designated Opportunity Zones under the federal Tax Cuts and Jobs Act of 2017. The focus of these efforts shall be to improve social equity and opportunity for all.						
EV	1.7	Supporting Industries Fitting County Needs	The County shall strive to attract industries based on existing and projected workforce demographics, educational attainment, skills, and commute patterns, and which provide opportunities to residents living in designated disadvantaged communities.						








Study of Additional Potential Disadvantaged Community Designations

GP Element	#	Policy	Description	Implementation Timing	Siting & Development	Noticing & Outreach	Services & Infrastructure Investment	Coordination & Collaboration	Planning & Policymaking
EV	5.2	Energy Infrastructure	The County shall work to improve energy infrastructure to increase availability, reliability, sustainability, and use of renewable energy sources, with a focus on Existing Communities and equity in service to disadvantaged communities.						
EV	5.3	Broadband	The County should encourage efforts to equitably extend broadband capacity throughout the county, including to designated disadvantaged communities, and to encourage private sector investments in state-of-the-art high speed fiberoptic infrastructure for both commercial and residential use. The County should use its franchise agreement powers, among others, whenever possible to secure improved services						
EV	6.5	County Hiring Practices	The County shall leverage its status as the second-largest employer in the county to pursue best practices aimed at maximizing local hiring, with a focus on designated disadvantaged communities, in coordination with education and training providers.						
EV	6.7	Future Job Opportunities	The County shall collaborate with the Workforce Development Board to assess employment changes expected over the next 20 years and evaluate opportunities for job training and education to meet new economic opportunities, particularly in green energy and in designated disadvantaged communities within the county						






General Plan Programs

Total Program Count: 8



GP Element	#	Program	Description	Responsible / Supporting	Implementation Timing	Siting & Development	Noticing & Outreach	Services & Infrastructure Investment	Coordination & Collaboration	Planning & Policymaking
LU	H	Limit Alcohol and Tobacco Outlets	The County shall explore establishing zoning code limitations on the density of alcohol and tobacco outlets near sensitive receptors such as schools, childcare facilities, senior housing, parks, etc., and especially in designated disadvantaged communities, that is consistent with State law.	RMA / n/a	2020-25					
LU	Q	Identify Designated Disadvantaged Communities in Oxnard and Ventura Planning Areas	Within one-year of 2040 General Plan adoption, the County shall research the southwestern and northwestern Oxnard Planning Area and along the Ventura Avenue in the Ventura Planning Area using Cal EPA CalEnviroScreen to identify Designated Disadvantaged Communities (DDCs). Upon identification of DDCs, the General Plan maps and list of low income and disadvantaged communities in the General Plan will be updated. In addition, the Background Report will be updated to reflect the existing conditions and description of these DDCs.	RMA / All agencies as necessary	2020-25					
LU	R	Review of Designated Disadvantaged Communities	Every five years from the adoption of the 2040 General Plan, the County shall review changes to the CalEPA designations of disadvantaged communities as well as changes in localized income data and pollution burdens and amend, as necessary, the maps	RMA / n/a	ongoing					

GP Element	#	Program	Description	Responsible / Supporting	Implementation Timing	Siting & Development	Noticing & Outreach	Services & Infrastructure Investment	Coordination & Collaboration	Planning & Policymaking
			and lists of low income and disadvantaged communities in the General Plan.							
HE	A	Local, State and Federal Funding	<p>To the extent that Local, State and Federal housing funds are available, the County shall continue to administer grant/loan programs to assist lower-income households with the following housing and community related issues:</p> <ul style="list-style-type: none">• Support local non-profits to rehabilitate housing units.• Fund the development of owner-occupied and rental housing for lower-income households and for those households with identified special needs.• Support non-profit organizations and County service providers in their efforts to provide services and re-housing efforts to special needs populations including households who are either r/h or m/f s/e o o m• Disaster recovery efforts.• Investment in infrastructure and service upgrades in disadvantaged and low-opportunity areas. <p>The County shall consider as part of the next Consolidated Plan for 2025, establishing priorities for the distribution of funds, which may include criteria such as income targeting, housing for special needs including seniors and persons with disabilities, support services, and designated disadvantaged communities and areas of concentrated poverty that serve to affirmatively further fair housing.</p> <p>The County shall pursue funding from CDBG, HOME, and PHLA funds with a goal of obtaining approximately \$3.1 million dollars annually for the development affordable housing and improvements to services in low-opportunity and disadvantaged communities throughout the Entitlement Area.</p> <p>The County shall evaluate and consider applying for, and strive to receive and maintain thereafter Designation by demonstrating a sufficient number of policies that contribute to accelerating housing production.</p>	CEO / RMA	<p>Annually as part of the C Consolidated Plan</p> <p>2025 – The Consolidated Plan fund distribution priorities will be updated</p>					
HE	D	Infrastructure Constraints	<p>The County shall convene all stakeholders, agencies, and service providers in a forum to discuss the policies that impact infrastructure necessary for housing development. The purpose of the discussion would be to identify constraints and solutions in providing water, sewer services, and dry utilities for housing.</p> <p>As Area Plans are updated, especially in designated disadvantaged communities, the County shall apply for funding as funding sources are available from the Community Development Block Grant, Infill Infrastructure Grant Program, or other funding programs as available, to fund infrastructure design plans and infrastructure construction improvements supporting residential development in designated disadvantaged communities.</p> <p>The County's and Community District Element identifies the El Rio/Del Norte Area, a designated disadvantaged community, to be updated first and will assist in planning</p>	RMA / PWA, CEO	<p>Stakeholders, Agencies, and Service Providers Forum 2023</p> <p>Ongoing</p> <p>El Rio/Del Norte (December 2024)</p> <p>North Avenue and Ojai Valley Area Plan Update (2025-2029)</p>					

Study of Additional Potential Disadvantaged Community Designations

GP Element	#	Program	Description	Responsible / Supporting	Implementation Timing	Siting & Development	Noticing & Outreach	Services & Infrastructure Investment	Coordination & Collaboration	Planning & Policymaking
			<p>appropriate infrastructure for at least 179 multifamily units identified in the Sites Inventory, Background Report Appendix 5.A. Additionally, the County has been approved for \$300,000 in state Local Early Action Planning grant funds for various projects, one of which is to facilitate the El Rio/Del Norte Area Plan update.</p> <p>The Saticoy Sanitary District serves the unincorporated area of Saticoy, a designated disadvantaged community serving approximately 262 households. As part of the 2013-2021 Housing Element Cycle, approximately \$500,000 in CDBG funds was awarded to the Saticoy Sanitary District to remediate aging infrastructure and ensure reliable operation and processing of wastewater. The County shall distribute funding in the 2021-2029 Housing Element during two fiscal years through 2022.</p>							
HE	R	First-Time Homebuyer Assistance	<p>The County shall, in collaboration with community partners, provide down payment assistance to expand homeownership opportunities in Ventura County. Down payment assistance funds provided by the County may be used to leverage monies from other grants to provide additional assistance with the intent to make homeownership more attainable for families living in rental property.</p> <p>Beginning in the FY 2022-23 County budget cycle and based upon the annual funding cycles thereafter, the CEO-Community Development shall implement notice of funding availability and application acceptance process per year during the Housing Element cycle. Priority application points shall be given to applications received from households from low opportunity and/or disadvantaged communities.</p> <p>The County shall target an average of 12 down payment assistance each year, approximately \$300,000, utilizing CDBG funds throughout the Entitlement Area.</p>	CEO	FY 2022-23, Ongoing					
HE	W	Home Rehabilitation	<p>The County shall partner with non-profit organizations such as Habitat for Humanity to provide home rehabilitation assistance for homes owned by low-income families, veterans, and elderly residents on limited incomes. By addressing long-deferred home maintenance, and fixing critical repairs and code violations, this program helps families stay in their already affordable homes and avoid displacement.</p> <p>Based upon the annual funding cycles available to the County beginning in FY 2021-22, CEO-Community Development shall implement notice of funding availability shall and application acceptance process for up to 15 units or \$200,000, per year during the eight-year Housing Element cycle. Priority application points shall be given to applications</p>	CEO / RMA	FY 2021-22, Ongoing					

Study of Additional Potential Disadvantaged Community Designations

GP Element	#	Program	Description	Responsible / Supporting	Implementation Timing	Siting & Development	Noticing & Outreach	Services & Infrastructure Investment	Coordination & Collaboration	Planning & Policymaking
			received from low opportunity and disadvantage communities in entitlement areas to affirmatively further fair housing.							
COS	CC	Climate Emergency Council	Membership of the CEC shall be comprised of the following: § One person representing each Supervisorial District who has demonstrated interest in and knowledge of climate action planning shall be nominated by each of the five members of the Board of Supervisors, and confirmed by a majority of the Board of Supervisors resulting in a total of five Supervisorial District representatives; § One resident from each of the designated disadvantaged communities identified in the 2040 General Plan who has demonstrated an understanding of climate action needs as well as an interest in and knowledge of climate action planning shall be appointed by a majority of the Board of Supervisors; and § Two additional at-large members who have demonstrated special interest, competence, experience, or knowledge in climate action planning shall be selected by a majority of the CEC members.	CEO / RMA	2020-25					

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Appendix C

Comments Received During Public Engagement

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
1	Virtual Meeting	3/8/2023	N/A	Christine Vaughan	How long has Cal Enviro Screen been used by EPA? Where can baseline data be found?	Staff stated that CalEnviroScreen was first developed by CalEPA in 2013 and referred the commenter to the CalEnviroScreen website to access the baseline data.
2	Virtual Meeting	3/8/2023	N/A	Bryce Browne	What are we doing to clean up the water? The amount of added chemicals is insane compared to local city like Ojai.	Staff stated that there are over 150 water purveyors including in cities and companies, and that water quality is dependent on the household's water supplier. Staff stated that the Frequently Asked Questions (FAQs) addresses questions related to water and that water quality information can be found in consumer confidence reports, and referred the commenter to links provided in the FAQs to view consumer confidence reports.
3	Virtual Meeting	3/8/2023	N/A	Bryce Browne	What are we doing about the 5G towers? They have been consistently shown to cause issues.	Staff asked the commenter to follow up via email about the location of the 5G towers. <i>(To date, no further comments were received regarding 5G towers. For more information, see overall response in Chapter 5 of the Study.)</i>
4	Virtual Meeting	3/8/2023	N/A	Jeff Wilby	Will a DDC designation impact property values for these communities?	Staff stated that the FAQs addresses this question. Staff stated that the designation will not appear on property records, and that no disclosures are anticipated to be required after speaking with the County Assessor. Staff does not anticipate assessed property values or taxes to be impacted by the designation.
5	Virtual Meeting	3/8/2023	N/A	Francine Smith	Is the Petrochem site a part of this?	Staff stated that the designation options will cover the Petrochem site. <i>(Option 3 was developed after public engagement was conducted. Option 3 does not include the Petrochem site as a potential disadvantaged community.)</i>
6	Virtual Meeting	3/8/2023	N/A	Anonymous	Please explain how you informed the public about these meetings?	Staff stated that postcards were sent to the properties that may be affected by the designation and included properties in cities that are within 300 feet of the census tracts affected by those designations. Staff stated that notices were emailed to stakeholders as well as to the cities, and staff have coordinated with CAUSE. The public meetings were also announced at the Westside Community Council meeting in March. <i>(CAUSE stands for Central Coast Alliance United for A Sustainable Economy.)</i>
7	Virtual Meeting	3/8/2023	N/A	Francine Smith	And oil sites? Have cancer studies been done in our area like Santa Susannah site?	Staff stated that staff is not aware of cancer studies conducted specifically for the Santa Susana site, which staff believes is partially within the city of Simi Valley. Staff stated that the particular census tract containing the Santa Susana site was not identified as part of the research. <i>(Correction: the site is within unincorporated Ventura County.)</i>
n/a	Virtual Meeting	3/8/2023	N/A	Francine Smith	Thank you!	N/A
8	Virtual Meeting	3/8/2023	N/A	Anonymous	This is a comment for the last person who just asked about how you informed the public I literally just went to Very late to inform. Not okay.	Staff stated that postcards were mailed on February 24 and March 3, and apologized for the delayed receipt of the postcards experienced by community members.
9	Virtual Meeting	3/8/2023	N/A	Anonymous	Nice job with the Public outreach!!! Sounds like a lot of work went into that effort. Thank you	N/A

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
10	Virtual Meeting	3/8/2023	N/A	Dina Ontiveras	Hello! (especially Selfa!) I did not see Nyeland Acres on the map. Why does the County spray so much herbicides on the roadways? I have witnessed them spraying a lot on Santa Clara Avenue across the street from the residential areas in the water canal - going straight to the ocean. Has the county not thought about making a bridle path on Santa Clara Avenue just like in Camarillo, Thousand Oaks & Ojai. We have quite a few horse riders here. These are the charros. I think they deserve the same type of infrastrature.	Planning staff stated that Nyeland Acres is part of the El Rio/Del Norte unincorporated area, which has been identified as a DDC. Leveraging grant funding with the DDC status may help raise a project's priority level. For pesticide questions, staff referred the commenter to the FAQs for responses to pesticide questions. Agriulture Department staff stated that canals are sprayed because the canals have weeds that can negatively impact the adjacent crops. <i>(For more information, see overall response in Chapter 5 of the Study.)</i>
11	Virtual Meeting	3/8/2023	N/A	Anonymous	Would like to know if the Port of Hueneme and the City of Port Huenme are part of the study.	Staff stated that the City of Port Hueneme is not a part of the Study and that the Study only examines unincorporated areas, specifically near the cities of Santa Paula, Ventura, and Oxnard.
12	Virtual Meeting	3/8/2023	N/A	Anonymous	Please send notices about future meetings to your local media — the Star, Acorn, Santa Paula Times, Ojai Valley News, etc. You have a public information officer who should be able to handle that. Can you please coordinate that for your future meetings? The media can get that information out quickly and efficently online and in print.	Staff stated that this comment will be taken into consideration for future meetings. Staff stated that the County published a press release announcing the meetings, and that there will be two more meetings, focusing on Ventura specifically on March 10 and Santa Paula on March 13.
13	Virtual Meeting	3/8/2023	N/A	Dina Ontiveras	If the vehicles will not slow down for the pedestrians, maybe they will slow down for the horses?	Staff stated that grants that focus on DDCs may be able to help support infrastructure for traffic handling, as with existing Satcoy DDC, but it can be a slow process.
14	Virtual Meeting	3/8/2023	Oxnard	Anonymous	Is Ventura going to do anything to work towards healing the lands? The monocropping in Oxnard is destroying our soil and we need to be doing regenerative farming if we want to have a sustainable future for the community. This is why they have to spray so many chemicals. Biodynamic farming is the only way to avoid this and heal the land	Planning staff stated that a sustainable future for the County and community is important and directed comment to Agricultural Department staff, who stated that the Department of Pesticide Regulation has published a sustainable roadmap, which the County is looking at and considering whether it is a good fit for the county. The roadmap includes regenerative farming, biodiversity, and soil practices.
15	Virtual Meeting	3/8/2023	Santa Paula	Mary Ann Krause	Option 1 for Santa Paula is clearly a better option because so many low-income farmworker families live in the outlying areas around Santa Paula	Staff stated that this comment will be taken into consideration.
16	Virtual Meeting	3/8/2023	N/A	Caitlin Brooks	Was a review of SCAG's environmental justice areas part of your analysis for new DACs?	Staff stated that the County r e v i e w e d S C A G ' s E n v i r o n m e n t a l justice areas as well as other similar tools such as Healthy Places Index and the Local Agency Formation Commission's map of disadvantaged unincorporated communities. <i>(SCAG stands for Southern California Association of Governments.)</i>
17	Virtual Meeting	3/8/2023	N/A	Dina Ontiveras	Does the area include the Tijuantitas? this is on the other side of the 10th street bridge. The Spanish-speaking calls it this name because it is on the other side of the river.	Staff asked the commenter to follow up as staff is unsure of the location. <i>(To date, no further comments were received regarding the location of the Tijuantitas.)</i>
18	Virtual Meeting	3/8/2023	Santa Paula	Anonymous	Santa Paula is at grave risk from the Santa Clara Waste Water site just west of Santa Paula city limits that catastrophically exploded on Nov. 18, 2014. There is an application to reopen the site that was designated a Superfund site; the site regularly floods into the Santa Clara River. Can you do more investigation including a Geiger counter test for radiation since Oxnard shut down the pipeline due to excessive radiation?	Staff stated that the project referenced by the commenter is the RI-NU Project. The applicant for this project was in communication with County staff in January. Staff stated that they were evaluating and making changes before resubmission. There is a webpage on this project that is updated with new information. County staff offered to provide the commenter with a link to that webpage, help get the commenter on an email distribution list, or can provide more information through contact with the case processing team, which is not present at the meeting. <i>(The applicant withdrew the application for the RI-NU project in July 2023. The RI-NU project website is available at vcrma.org/en/ri-nu-wastewater-treatment-facility. For more information, see overall response in Chapter 5 of the Study.)</i>
19	Virtual Meeting	3/8/2023	Santa Paula	Anonymous	The CUP for that site should be nullified, according to all Planning rules due to the criminal activity that occurred on that site. The neighboring site is absolutely a DDC.	See response to comment ID #18.

Study of Additional Potential Disadvantaged Community Designations

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
20	Virtual Meeting	3/8/2023	Santa Paula	Anonymous	In evaluating the pollution at the Santa Clara Waste Water site, have you used a Geiger counter to test for radiation since it was verified at that site at high, illegal levels?	Staff stated that the relevant team is not present at the meeting, but told the commenter that they can follow up. (<i>See response to comment ID #18.</i>)
21	Virtual Meeting	3/8/2023	Oxnard	Anonymous	Is the Anterra site in an unincorporated area?	Staff apologized for not being familiar with these particular sites and offered to follow up and confirm. Staff also reiterated that there is a tool on the DDC website that can be used to look up specific addresses. (<i>For more information, see overall response in Chapter 5 of the Study.</i>)
21a	Virtual Meeting	3/8/2023	Oxnard	Jasmin Kim	Yes, I believe that site is in an unincorporated area.	See response to comment ID #21.
22	Virtual Meeting	3/8/2023	N/A	Dina Ontiveras	I heard you mention that you used the Consumer Confidence report for water quality, but I am curious about the poor water quality. Where, specifically, is the water of poor quality? I know that my water company passes the CCCR criteria.	Staff stated that CalEnviroScreen's highest indicators related to water resources were locations of impaired water bodies and water threats, drinking water contaminants, and groundwater. Impaired water bodies are those that meet a federal level designation that does not pass water quality inspections and can refer to streams or other types water bodies. The groundwater indicator is determined by the location and status of underground storage tanks, based on state level information. Staff stated that staff will have to look back at the DDC project files to determine the data source for the drinking water contaminants indicator. Staff also stated that interested individuals can take a look at CalEnviroScreen, which has a mapping tool that shows data on individual indicators for individual census tracts, including how it uses data and where it gets the data from.
23	Virtual Meeting	3/8/2023	Oxnard	Anonymous	Anterra has been a waste disposal site for years beneath a strawberry field and had to be shut down. It is on Wooley Road in Oxnard.	See response to comment ID #21. (<i>For more information, see overall response in Chapter 5 of the Study.</i>)
24	Virtual Meeting	3/8/2023	Santa Paula	Ana Rosa Rizo-Centino	There is nothing Ri-Nu can do to make their facility acceptable to the community. The risk is far too high for the health of the people who live and work in the area!	Staff stated that the input is noted and will be taken into consideration. (<i>See response to comment ID #18.</i>)
25	Virtual Meeting	3/8/2023	Oxnard	Jasmin Kim	I believe that site is on Rose Ave. and E Wooley Road - if that is true, the site is in an unincorporated area.	Staff confirmed that the site is in an unincorporated area. (<i>For more information, see overall response in Chapter 5 of the Study.</i>)
25a	Virtual Meeting	3/8/2023	Oxnard	Anonymous	1933 E. Wooley Road Oxnard is location of Anterra.	Acknowledged. (<i>For more information, see overall response in Chapter 5 of the Study.</i>)
25b	Virtual Meeting	3/8/2023	Oxnard	Jasmin Kim	1933 E. Wooley Road Oxnard, is outside the City Boundary.	Acknowledged. (<i>For more information, see overall response in Chapter 5 of the Study.</i>)
26	Virtual Meeting	3/8/2023	N/A	Anonymous	How is the county team made aware of potential polluting sites? Is the county only aware of them through complaints by the public?	Staff stated that the CalEnviroScreen tool compiles data from hazardous facilities and facilities that may potentially emit toxic releases. Based on this documented data in CalEnviroScreen from local, state, and federal agencies, scores are assigned based on how close these facilities are to residential areas. These scores were taken into consideration for the Study in addition to other types of data. For example, Planning staff coordinated with Pesticide Use Enforcement staff to examine complaints and violations related to pesticide use under that program. Additionally, Planning staff coordinated with the Environmental Health Division, which documents and investigates violations over which the County has regulatory or permitting authority. In summary, staff tried to look at a variety of data that includes a number of complaints, reports, inspections, and investigations that are available to the County.

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
27	Virtual Meeting	3/8/2023	Oxnard	Anonymous	If Anterra is in an unincorporated area, it should definitely be evaluated for safety due to the massive amounts of oil waste disposed for years at the site and we wonder if you independently test for potential hazards. Please advise. Thank you.	Staff stated that the site appears to be in the unincorporated area. Staff thanked the commenter for the input and that staff will take a closer look. <i>(For more information, see overall response in Chapter 5 of the Study.)</i>
28	Virtual Meeting	3/8/2023	Oxnard	Jasmin Kim	Please be advised that this is the City of O x n a r d ' s J u r i s d i c t https://www.oxnard.org/wp-content/uploads/2017/07/2030-Jursidictional-30x40V4.pdf	Acknowledged.
29	Virtual Meeting	3/8/2023	N/A	Anonymous	Do complaints at the county level make it up to the state level to be registered and noted by Calenviroscreen?	Staff stated that although CalEnviroScreen's data is quite comprehensive, it does not appear to include data on local level complaints. Staff did not think that potential complaints or violations for pesticide use are registered in CalEnviroScreen. The tool uses data that can be aggregated at the census tracts level. In other words, it divides up the information so it can extrapolated and aggregated by census tract. The data must be publicly available so that all census tracts in California can be compared with one another.
30	Virtual Meeting	3/8/2023	N/A	Jasmin Kim	Please be advised that environmental complaint forms can be filed with CalEPA: https://calepa.my.salesforce-sites.com/complaints/	Acknowledged.
n/a	Virtual Meeting	3/8/2023	N/A	Jasmin Kim	Thank you.	Acknowledged.
31	In Person	3/10/2023	N/A	Marianne Parra	Commenter asked why this meeting is not being held at the community center in S a t i c o y , a s a l o t o f t h e c o m m u n i t y i understand QR codes, and are left out completely. People will show up, but not i f t h e y d o n ' t h a v e s o m e w h e r e c l o s e r public transportation.	Staff stated that Saticoy has been designated as a disadvantaged community, and this project is focused around the Study Areas. As part of the County's General Plan update project, Saticoy, El Rio, and Piru were designated, and the County held meetings in those communities at that time. Staff stated that if there are issues related to Saticoy, the Saticoy Municipal Advisory Council is a great p l a c e t o b r i n g i s s u e s t o t h e C o u n t y '
32	In Person	3/10/2023	N/A	Jan Dietrick	Commenter was pleased that the meeting included a booth about sea level rise. Commenter stated that she thinks a lot about flooding as well. The County needs a stronger ordinance to avoid developing in flood prone areas. That seems like a big risk, living where there is flooding.	Staff directed the commenter to the appropriate staff members present at the meeting who could answer questions about sea level rise. <i>(For more information, see overall response in Chapter 5 of the Study.)</i>
33	In Person	3/10/2023	Ventura	Ron	Commenter stated that there is an area along the Ventura oil fields that travels along the river. The pollution is spread around, diluted as the mountains heat up in the morning and draws air up the river, and as it cools down it slides back down toward the ocean. Commenter raised two questions: the significance of the oil fields negatively impacting the people in the North Avenue Area, as well as the Petrochem Plant. Commenter wondered about how the pollution from the oil wells is considered as it relates to hazards.	Staff stated that CalEnviroScreen looks at impaired water bodies and hazardous sites, and these indicators are taken into consideration when identifying potential DDCs in the North Ventura Avenue area. County staff stated that the Petrochem site is included, but was unsure if all oil wells are included. The intent behind identification of DDCs is to provide more protective policies specifically for residential communities. However, if an applicant wants to drill new oil wells, the applicant may potentially face more scrutiny regarding regulations and policies. There are programs and policies that would provide more protection to the community and its residents going forward within a DDC. <i>(For more information, see overall response in Chapter 5 of the Study.)</i>

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
34	In Person	3/10/2023	Ventura	Jan Dietrick	Commenter stated that there are at least 12 oil wells within 1500 feet of where commenter lives. Commenter stated that an oil well is operation on a permit from 1945. So the operator could just keep doing what they are doing and have permission to redrill. We need to be designated as a DDC. In North Ventura, the water supply is city water. We want to be safe. There is a very substantial aquifer right underneath and comes a tested for anything. I think a report of a well testing from 1 brackish. But when I talk to experienced hydrologists, it cannot be saltwater from the ocean. The implication is that it is from the injection wells. Commenter stated that really bothers her, spending millions bringing water from here and there, drilling wells, but we cannot even figure out the safety of the aquifer right there.	Staff stated that CalEnviroScreen takes water resources into consideration. Staff offered to follow up with the commenter about this and explained that there are annual consumer confidence reports available that indicate whether there are contaminants within the water supply, if any, depending on the resident's water supplier. <i>(For more information, see overall response in Chapter 5 of the Study.)</i>
35	In Person	3/10/2023	Ventura	Name was not stated for the record.	Commenter stated that commenter is confused looking at the options. What are the projects? Is this only for the builders to build housing? Companies? What projects will help the individual? We are listed high for pesticides. Commenter stated that there may be one little lemon grove that has been cut down, and potentially avocado trees in the area. Are the pesticides from lemons and avocados? The big contaminants are petrochem. We have pictures of the whole Santa Barbara channel covered in oil. Commenter stated there is no mention of fracking. Commenter is not clear what the options are and how this will help individuals or farmers. Will it help remove popcorn ceilings, lead contaminants? What are some examples? Commenter mentioned fire issues, such as experiencing asthma problems. LA Fire came to the rescue during the fire. Along the Avenue, there were people helps people get out, that increases fire safety? Commenter reiterated that commenter does not understand the options and what the examples are of what the County is going to do.	Staff stated that the objective of this project is to determine whether any areas within the Ventura Study Area should be identified as a DDC. The County is not proposing any specific projects under this Study. It is an initial step in identifying some of the concerns that community members may have. The County has conducted this outreach meeting to get the community's input. Designation could bring in more grant funding to help improve the community in terms of providing better public services and infrastructure. For example, there have been projects in existing DDCs to improve sidewalks. Grant funding is dependent on availability of the funding source. These grant opportunities are open to the government and community based organizations. Staff stated that the County will take a closer look at the oil fields. CalEnviroScreen takes into account hazardous facilities and toxic releases at the census tract level, which includes some of these oil fields. The scores may be affected by some hazardous facilities and toxic releases from other areas. Staff pointed out that the census tracts being studied are vast and that this is a limitation of CalEnviroScreen. Staff also stated that fire safety improvements are not addressed as part of the project. It is being looked at by the board of supervisors, depending on location and high fire zones. The County fire department is working on new regulations coming from the state, including expanding high fire zones. There have been new requirements on the clearance of vegetation. For example, within 5 feet of structures, there is to be no vegetation. Staff reiterated that wh to harden infrastructure, it is not part of the DDC project. However, it is being addressed elsewhere. <i>(For more information, see overall response in Chapter 5 of the Study.)</i>
35a	In Person	3/10/2023	Ventura	Name was not stated for the record.	Commenter stated concern for people being lined up and not being able to get out, and the importance of improving infrastructure for getting out.	See response to comment ID #35.
36	In Person	3/10/2023	Ventura	Name was not stated for the record.	Commenter stated that this is ancestral fire zones. There is a lot of grazing happening, bringing sheep and goats in. There is a continual cycle so that when fire season does come around, we will have taken down this landscaping, and introduce native plants. With all the rain, the potential is going to be huge. They have been working on it since December, just a lot of manpower that has to be done.	Acknowledged. See response to comment ID #35.

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
37	In Person	3/10/2023	Ventura	Jan Dietrick	Commenter stated that Option 2 might not include areas with pesticides. Commenter inquired about Taylor Ranch.	Staff stated that this location is on the west side, which is not within the Study Area.
38	In Person	3/10/2023	Ventura	Ron	Commenter stated that spraying occurs, that pollution is travelling on the river and on the river valley. Seems like it should be considered.	Acknowledged. <i>(For more information, see overall response in Chapter 5 of the Study.)</i>
39	In Person	3/10/2023	Ventura	Name was not stated for the record.	Commenter stated that commenter lives at the Valley Vista tract. There is a field that has been torn up. Commenter asked whether the County is thinking about relocating whatever is being proposed for construction in the Valley Vista tract.	Staff stated that the project is not proposing to build anything.
40	In Person	3/10/2023	N/A	Name was not stated for the record.	Commenter asked what the drawbacks of being a DDC are.	Staff stated that community members may not feel the effects right away, as grant funding may be hard to come by. Staff also stated that another concern is gentrification. However, it may be too early to know whether gentrification will occur as a result of the project. Finally, staff stated that designation may also be more costly for developers, with more public outreach and more evaluation requirements for projects that are proposed in the area.
40a	In Person	3/10/2023	N/A	Name was not stated for the record.	Commenter clarified that for developers, DDC identification may be a disadvantage, but it will not be a disadvantage to current residents.	Staff expressed agreement.
41	In Person	3/10/2023	N/A	Name was not stated for the record.	Commenter asked what option 1 and 2 are, who gets to decide the options, and why.	Staff stated that the difference between the two options is the type of land use boundaries being used in each option. Staff pointed out an area of agricultural and open space land use would be included in Option 1 that would not be included in Option 2. This is because Option 2 relies on Existing Community boundaries that are established in the General Plan and focuses on urban and residential communities. Staff stated that while the two options are similar in Ventura, the same approach results in very different designations for Oxnard and Santa Paula.
42	In Person	3/10/2023	Ventura	Name was not stated for the record.	Commenter asked if options include industrial uses.	Staff pointed out industrial areas on the map and industrial areas that would be included in both options.
42a	In Person	3/10/2023	Ventura	Name was not stated for the record.	Commenter asked if options include oil fields.	Staff pointed out oil field areas on the map that are not included in either option.
42b	In Person	3/10/2023	Ventura	Name was not stated for the record.	Commenter asked if North Ventura Avenue is included.	Staff confirmed that areas adjacent along North Ventura Avenue would be included within the designation boundary options.
43	In Person	3/13/2023	Santa Paula	Connie Tushwell	Commenter asked how Option 1 and Option 2 will affect agricultural lands and industrial land uses.	Staff explained and clarified both options using the presentation slides and provided examples of policies that could be imposed.
44	In Person	3/13/2023	Santa Paula	Name was not stated for the record.	Commenter asked for clarification of notable roads or landmarks to mark the boundaries, such as highway off-ramps.	Staff pointed out general geographical areas on the map and noted the location of certain off-ramps as examples.
45	In Person	3/13/2023	Santa Paula	Name was not stated for the record.	Commenter asked how much agricultural land is included in Option 1 and Option 2.	Staff stated that the overall percentage of agricultural and open space lands are noted on the posters. The percentages of agricultural and open space lands for each option has not been calculated.

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
46	In Person	3/13/2023	Santa Paula	Name was not stated for the record.	Commenter thanked staff for helping the community care about the Mission Rock Road area. Commenter asked who would lead grants? Who would do application? Will City of Santa Paula be involved?	Staff explained the variety of grants available and that each grant has its own set of requirements and eligible types of applicants that may apply for the grant.
47	In Person	3/13/2023	Santa Paula	Name was not stated for the record.	Commenter stated that the city is short staffed and it would be nice for the County to initiate the grants, if the grant is available. Commenter pointed out that staff mentioned a higher level of scrutiny on applications. Would that scrutiny also be imposed on pending applications? Commenter has the RI-NU project in mind.	Staff stated that additional scrutiny is currently not applicable to the RI-NU project as that site is currently not in a DDC. This may be revisited if the area in which the RI-NU project is located is officially designated as a disadvantaged community. (<i>The applicant withdrew the application for the RI-NU project in July 2023. The RI-NU project website is available at vcrma.org/en/ri-nu-wastewatertreatment-facility. For more information, see overall response in Chapter 5 of the Study.</i>)
48	In Person	3/13/2023	N/A	Name was not stated for the record.	Commenter asked whether a designation option will be picked and when this project will come before the Board of Supervisors.	Staff stated that the Board of Supervisors will make a determination regarding designations later in the year.
49	In Person	3/13/2023	N/A	Name was not stated for the record.	Commenter asked how long the DDC status lasts once designated.	Staff stated that the General Plan requires review of DDCs every 5 years. Staff also stated that CalEnviroScreen also conducts periodic reviews of the communities it has identified as disadvantaged.
50	In Person	3/13/2023	Santa Paula	Mary Ann Krause	Commenter supports Option 1 because it is the most inclusive, largest, and includes the most farmworkers. The housing that Limonera owns/operates located in the western/northwestern part of the census tract is not low-income according to CalEnviroScreen, but the area does have pockets that seemingly should be low-income. Commenter noted that the housing on Pine Road and mobile home park on Wheeler Canyon are both low-income. Option 1 includes ranches where farmers live. Commenter noted that where farmers live may not be heavy on pesticides, but Santa Paula has a lot of low-income workers who work in the Oxnard plain with row crops that are impacted both at work and at home. In addition, Option 1 includes four schools: Mupu School off Highway 150, Santa Clara School off Highway 126; Briggs, which had to be evacuated when the incident at the RI-NU site occurred; and a 4 th school, Oliveland. All schools serve some low-income students, even though higher income students are also there, and the students are impacted. Commenter stated that the CalEnviroScreen scores are low for the census tract. Commenter asked the audience to raise hands in support of Option 1. More than 10 people raised their hands.	Acknowledged. (<i>For more information, see overall response in Chapter 5 of the Study.</i>)
51	In Person	3/13/2023	Santa Paula	Name was not stated for the record.	Commenter spoke as a ranch owner on the river and agreed that Option 1 is better as it is inclusive of land and that the river, which is environmentally important, is not included in Option 2. Commenter noted that commenter is the only person notified in the neighborhood. Commenter is concerned about environmental pollutants in the river. Commenter needed more clarifications on project goals.	Staff acknowledged commenter's input and offered to show commenter a table of General Plan policies and programs that focus on DDCs. Staff also provided background information on Senate Bill 1000 for additional context.
52	In Person	3/13/2023	Santa Paula	Mary Ann Krause	Commenter referenced a 2021 environmental study where County staff stated the community was not a DDC at that time. Commenter expressed that had the community been designated at that time, community members would have been given more of the County's time to t the County turned community members away.	Staff acknowledged the commenter's input and provided the example of Saticoy's sewage trunk line updates. Because of Saticoy's status as a DDC, Saticoy was able to take advantage of a grant opportunity that allowed for those updates.

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
53	In Person	3/13/2023	N/A	Name was not stated for the record.	Commenter asked how the designation boundary options had been set.	Staff stated that census tracts with CalEnviroScreen scores of 75 and above, and those that meet the income threshold, along with boundaries based on Area Plans and Existing Communities with residential land uses within a one-mile radius of those census tracts were used to determine boundary options.
54	In Person	3/13/2023	N/A	Name was not stated for the record.	Commenter asked whether all 21 indicators have detailed data.	Staff stated that CalEnviroScreen has a detailed report that explains each indicator.
55	In Person	3/13/2023	Santa Paula	Name was not stated for the record.	Commenter asked whether Highway 126 and traffic are included as an indicator.	Staff stated that traffic is an indicator, including air pollutants.
56	In Person	3/13/2023	N/A	Name was not stated for the record.	Commenter asked about any recent discussion with the Board of Supervisors and whether staff has a sense of direction.	Staff stated that the project, including the research findings and public input, will first be presented to the Planning Commission and then the Board of Supervisors. The Board will make the final determinations regarding designations.
57	In Person	3/13/2023	N/A	Paula	Commenter felt like commenter was playing catch up. Commenter found out about the project and meeting on the internet by accident. Commenter recommends better communication with the community and using newspaper notices. Regarding grant money, once allocated, who receives funds, who measures outcomes? If insufficient funds are received, what would happen?	Staff stated that these factors are dependent on the grant. Different grants have different requirements on how much would be awarded, who the recipient would be, and the tracking/reporting measures that would be required. Staff also summarized the outreach approach and stated who was contacted about these outreach meetings. <i>(For more information, see overall response in Chapter 5 of the Study.)</i>
58	In Person	3/13/2023	Santa Paula	Name was not stated for the record.	Commenter did not know about this meeting. Commenter suggested that noticing take place sooner. What are the benefits of project? Commenter provided the example of the Pajaro Levee failure in which the low-income community was not protected. This cannot happen here, so we need this designation.	Acknowledged. <i>(For more information, see overall response in Chapter 5 of the Study.)</i>
59	In Person	3/13/2023	Santa Paula	Laura	Commenter stated that years ago the community sought to get designation for low-income communities. Commenter is a representative of the community's Latino community members. Many of these areas are low-income with lots of agriculture, and with agriculture comes farmworkers. Commenter expressed regret for not being notified sooner in order to be prepared, as it takes time to schedule, understand the project, and come prepared with questions, etc. Commenter stated that the population is nearly 30% children under the age of 18. According to the state's criteria and brief review of CalEnviroScreen, sometimes we find ourselves politically left out due to the low stats on CalEnviroScreen. We don't feel power decisions. Commenter noted that all of the items listed sound great the negatives are not listed. There are 240,000 Medi-Cal recipients, the majority of which reside in Santa Paula and Oxnard. Santa Paula sits less than two miles from the RI-NU site. Even though the County has great intentions, outreach may not be reaching workers on private property in a timely manner. Commenter suggested that one way of eliminating health disparities is to designate.	Staff acknowledged the commenter's input and stated some drawbacks of being a DDC, including slow progress, gentrification, and increased costs to implementing new projects. <i>(For more information, see overall response in Chapter 5 of the Study.)</i>

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
59a	In Person	3/13/2023	Santa Paula	Laura	Commenter provided a written copy of comment ID #59. A copy of the letter is attached.	Staff sent an electronic notification to the general email address of Santa Paula Latino Town Hall and its President as identified on its website, Cynthia Salas, on February 24, 2023. For additional information on how the public meetings were publicized and promoted, refer to Chapter 5 of the Study. Staff spoke directly with the commenter at the public meeting in Santa Paula and obtained an additional email address to send future notices. The commenter's statements on Santa and related health and quality-of-life impacts, and Medi-Cal enrollment statistics are acknowledged. The census tracts evaluated within the Santa Paula Study Area scored moderately among CalEnviro characteristics, including those identified by the commenter. The educational attainment indicator scored highest at 83.80; no other indicators scored above 75. The commenter's statements regarding wastewater treatment facility are acknowledged. For additional information regarding this facility, refer to Chapter 5 of the Study.
60	Form	3/7/2023	Ventura	JP	5. I have not been impacted at all, none, zilch, nada6. I see no pollution burdens or socioeconomic burdens at all7 . Don't bring any of hereSpecific Location: Unincorporated Ventura Avenue around Cañada lard	Acknowledged. Although commenter states that commenter does not experience or observe any pollution burdens or socioeconomic burdens, it is also acknowledged that other public comments received regarding the Ventura Study Area indicate otherwise. For additional information regarding the public comments received, refer to Chapter 5 of the Study.
61	Form	3/8/2023	Oxnard	Dina Ontiveras	5. "Pesticides Large tractor trailer traffic Freeway smog pollution Herbicides on Santa Clara Avenue Nuisance at night - noise at night due to recording of trespassing announcement"	Acknowledged. For more information, see overall responses in Chapter 5 of the Study.
62	Form	3/10/2023	Santa Paula	Nathaniel Pidduck	5. Hazardous Waste, Impaired Water Bodies 7. I strongly support Option 1. Specific Location: Mission Rock Rd.	Acknowledged. For more information, see overall responses in Chapter 5 of the Study.

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
63	Form	3/10/2023	Ventura	Zeke perez	<p>5. "(Ventura Avenue from Shell Road to Cañada Larga) I do not believe that where I live is a disadvantaged community. Why did you designated as such? All my neighbors and my family love living here Unincorporated. We are not disproportionately burdened by environmental pollution. What the heck are you thinking? We do not want county policies and programs medeling,In our lives. Is this just your way and excuse for raising our taxes. You are making a mess down the avenue and downtown with all the multi story buildings you're put t r e a l g n e u p . Please Thank you for allowing us to participate in public meetings, and I hope you will take into consideration what I have communicated"</p> <p>6. "I do not believe that where I live is a disadvantaged community. Why did you designated as such? All my neighbors and my family love living here Unincorporated. We are not disproportionately burdened by environmental pollution. What the heck are you thinking? We do not want county policies and programs medeling,In our lives. Is this just your way and excuse for raising our taxes. You are making a mess down the avenue and downtown with all the multi story buildings you're putting up. Please Thank you for allowing us to participate in public meetings, and I hope you will take into consideration what I have communicated"</p> <p>7. We need a dog park in this area ! Specific Location: Ventura Avenue from Shell Road to Cañada Larga</p>	<p>The commenter's input is acknowledged. It is also acknowledged that other public comments received regarding the Ventura Study Area indicate experiences of environmental pollution burden. Assessed property values are not anticipated to increase as a result of disadvantaged community designation. The County does not have jurisdiction of development projects within cities. For additional information regarding the public comments received, refer to Chapter 5 of the Study.</p>
64	Form	3/15/2023	Santa Paula	Heather Merenda	<p>5. Fillmore has some of the highest burdens in Ventura County on this scale, so it's unclear why Fillmore has been eliminated from the study area when Fillmore needs significantly more resources per capita.</p> <p>6. The City of Fillmore has the highest sewer and water costs for any area in Ventura County. Fillmore is surrounded by pesticide, crop burning, gravel mining, and oil and gas extraction</p> <p>7. I respectfully request you add Fillmore to the study area</p>	<p>The County is studying potential disadvantaged communities in unincorporated areas of Ventura County and does not have regulatory authority to designate disadvantaged communities within cities. Each city is responsible for identifying disadvantaged communities within its own jurisdictional boundaries pursuant to Senate Bill 1000. Please contact the City of Fillmore regarding disadvantaged communities within its jurisdiction.</p>
65	Form	3/15/2023	Santa Paula	Anonymous	<p>5. Homeless living in barranca and setting up camp by public buildings next to residences most likely defecating as there are no restrooms this is toxic also cross walk does not align with railroad crossing this folks use walking path placing all in danger when making left and right turns there is no four way stops!</p> <p>6. Homeless and horrible streets pavement Specific Location: Dean and Main Street by railroad tracks</p>	<p>The commenter's input is acknowledged. For additional information, see overall response in Chapter 5 of the Study.</p>
66	Form	3/20/2023	Ventura	Anonymous	<p>5. Providing input for: Saticoy - near Ventura and Santa Paula Why isn't the reports or studies conducted on the impacts of constant flying of planes + pesticide use carrying these through Ventura and Santa Paula</p>	<p>CalEnviroScreen 4.0 incorporate data on pesticide use. Although CalEnviroScreen does not specifically incorporate data on the use of planes to apply pesticides, air quality data is incorporated for fine particle (PM2.5) pollution and ozone pollution. For additional information on pesticide use in the Ventura and Santa Paula Study Areas, please refer to the "Pesticide Use" section in Chapter 3 of the Study and overall responses in Chapter 5 of the Study.</p>

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
67	Form	3/20/2023	Santa Paula	Anonymous	5. Providing input for: Saticoy - near Ventura and Santa Paula Why isn't the reports or studies conducted on the impacts of constant flying of planes + pesticide use carrying these through Ventura and Santa Paula	CalEnviroScreen incorporates data on pesticide use, and the Ventura County Agricultural Commissioner enforces proper use of pesticides at the County level. For additional information on pesticide use in the Ventura and Santa Paula Study Areas, please visit the "Pesticide Use" section in Chapter 3 of the Study. CalEnviroScreen does not specifically incorporate data on the use of planes to apply pesticides, but CalEnviroScreen incorporates air quality data through two measurements: fine particle (PM 2.5) pollution and ozone pollution. In addition, the unincorporated area of Saticoy has been designated as a disadvantaged community. General Plan policies and programs that address environmental pollution burdens in DDCs would be applicable to the unincorporated area of Saticoy.
68	Form	3/20/2023	Santa Paula	Anonymous	5. Pesticides in the farming fields. 6. Santa Paula Airport. Planes constantly flying over neighborhoods close to the houses. The planes flying over our neighborhoods is not good for our health. Inhaling toxic gasses everyday is not good for our overall health.	The commenter's input is acknowledged. The County does not have jurisdictional oversight of the Santa Paula Airport as the airport is located within the city of Santa Paula. For additional information, see overall response in Chapter 5 of the Study.
69	Form	3/20/2023	Ventura	Ron Whitehurst from Rincon Vitova	5. Volatiles from oil wells, BTEX etc. Herbicide laden dust when windy - oil companies use herbicide to control weeds for fire safety 6. Taylor Ranch uses toxic pesticides, drift affects Ventura Ave area, carried up the narrow river valley with diurnal breezes Specific Location: 108 Orchard Drive, Ventura	The commenter's input is acknowledged. Please refer to the overall responses in Chapter 5 of the Study.
70	Form	3/20/2023	Santa Paula	Anonymous	5. Santa Paula housing stock is majority over 50 yrs old so a lot of lead paint exposure to children. 7. Thank you!	Acknowledged. CalEnviroScreen evaluates children's lead risk from housing based on the age of housing, (which indicates the potential presence of lead-based paint), the percentage of households deemed low-income, and the presence of children under six years old. A census tract evaluated in Santa Paula scored above 75 for this indicator. For additional information regarding this indicator, please refer to Chapter 3 of the Study.
71	Form	3/20/2023	Santa Paula	Paula McLay, Private Citizen	5. n/a 7. I understand that there was a "gap" getting info re: this meeting. We are unique community & need to have specific outreach Ex: SP Times, community center Please no political people to do outreach Specific Location: I have concerns re: vacant land on Peck Rd & Foothill Rd. Is this impacted by DDC.	Acknowledged. For additional information, see overall response in Chapter 5 of the Study.
72	Form	3/20/2023	Santa Paula	Anonymous	5. Ag & Oil threats of pollution to River through Ag & Oil - homeless in River exposed to toxic residues from runoff.6. Agriculture/migrant workersWater Pollution.7. Please contact me w/possible next stepfredericka_klairice@gmx.de	The commenter's input is acknowledged. Commenter has been included for future notifications regarding this project. For additional information, see overall responses in Chapter 5 of the Study.

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
73	Email	3/7/2023	Ventura	Julie Perez	<p>I do not believe that where I live is a disadvantaged community. It is not. Why did you designated as such? All my neighbors and my family love living here Unincorporated.</p> <p>We are not disproportionately burdened by environmental pollution. What the heck are you thinking? We do not want county policies and programs medeling,In our lives. Is this just your way and excuse for raising our taxes. You are making a mess down the avenue and downtown with all the multi story buildings you' seelave this are a lgn e u p . P l e a</p> <p>Thank you for allowing us to participate in public meetings, and I hope you will take into consideration what I have communicated</p> <p>Specific Location: 5092 Floral Dr. in the Valley Vista tract</p>	See response to comment ID #63.
74	Email	3/9/2023	Santa Paula	Mary Ann	<p>I was at the online presentation last night and have looked around the DDC website. My understanding of option 1 from the written description is that it includes the entire Area of Interest, but that is not what the map is showing, so I am confused. If option 1 includes the area of interest, then it picks up the farmworkers that live on Limoneira headquarters property, at Olivelihoods, and at the Limoneira's Aliso Canyon housing important properties to include. It is also important to include Olivelihoods School on Foothill, and also Briggs School at Telegraph and Briggs because Briggs school is within a mile of the Mission Rock Road area and had to be evacuated during the explosion at Santa Clara Waste Water in 2014. Can you provide clarification so that I can inform p</p>	<p>Thank you for looking at the DDC website. Option 1 uses the Area Plan boundary to identify potential DDCs, but if there are no Area Plans in the Study Area, then Option 1 will use the Area of Interest boundary, which is also the same boundary as the Study Area for this project.</p> <p>For Option 1: The Ventura Study Area has an applicable Area Plan, so the Area Plan boundary was used to identify DDCs in the Ventura Study Area. The County does not have an Area Plan in unincorporated Santa Paula, so the Area of Interest/Study Area boundary was used to identify DDCs for the Santa Paula Study Area.</p> <p>It would be helpful for me if you could provide the address for the locations that you have identified so I can help confirm whether these locations are included in Option 1 in Santa Paula. So far, I can confirm the following locations – but please make sure these addresses are the correct addresses you are referring to:</p> <p>Limoneira Headquarters: 1141 Cummings Road – included in Option 1 Olivelihoods School: 12465 Foothill Road – included in Option 1 Briggs School: 14438 W. Telegraph Road – included in Option 1 Limoneira's Aliso Canyon rk–please provide an d address</p> <p>Please feel free to let me know if you have any more questions.</p>

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
74a	Email	3/9/2023	Santa Paula	Mary Ann	The addresses you provided are correct. What I call the Aliso Canyon housing is actually all the housing on Pine Road on the north side of Foothill just east of Aliso Canyon (easily visible on Google mobile home park is, it is on the west side of Wheeler Canyon Road (NOT Aliso Canyon Rd.) about a quarter of a mile north of Foothill (also very visible on Google maps). I do not have an address for the MHP that I am sure of. Google maps says it is 12585 Foothill Rd. If you need an exact address you can call Limoneira headquarters and ask for Rosie Castillo, who manages their residential properties.Can you tell me the barrancas or other boundaries for Santa Paula's Area of Interest? Or I spent half an hour this morning searching the LAFCo website looking for an Area of interest map, and when I found it I realized the actual boundaries are not apparent; community members will ask me about the boundaries when I email them again about Monday's meeting.	Thank you for the additional information on the locations of the housing on Aliso Canyon and the mobile home park. Below are screenshots from Google to confirm with you that these are the areas you are referring to. If these are the correct areas, they are both included in Option 1 for the Santa Paula Study Area. As for the Area of Interest boundaries, we have a map of it in the County General Plan's Background Report, I i (or page 3-9 of the document) and PDF page 12 (or page 3-10 of the document) for a description and map of the Areas of Interest. This document also contains various other types of land use boundaries if you are interested in learning more about them. Link to the County General Report: https://docs.vcrma.org/images/pdf/planning/plans/VCGPU_03_Adopted_Land_Use_September_2020.pdf Aliso Canyon housing:[Image was provided] Mobile home park:[Image was provided]
74b	Email	3/9/2023	Santa Paula	Mary Ann	Yes, those are the Limoneira housing on Pine Rd and the Limoneira MHP I Wheeler Canyon. Thanks for the GP Background Report, as well.	Acknowledged.
75	Email	3/10/2023	N/A	Wes Woods II, West County reporter for Ventura County Star	For now, I just have a couple of questions. The first is when will this move to the Planning Commission (and then the Board of Supervisors) for discussion? Is there a timeline for that part of the process or are there more community meetings planned? Also, when the meetings are finished can residents still contribute comments via website or email or phone number. Lastly, at least for now, how did this study/process come about? Was there a Board of Supervisors directive or a grant or something else? I'll definitely be at the meeting tonight so if I have more questions from the presentation, I can ask them there.	Planning Commission and Board of Supervisors hearings are tentatively anticipated in summer 2023. Residents can still contribute comments via website, email, phone, or mail until March 27, 2023 to allow staff time to review the comments prior to taking the project to a hearing, but comments are still welcomed after March 27. In addition, community members will have opportunities to send in comments or make public comments at future Planning Commission and Board hearings. This study is a product of Implementation Program LU-Q in the County General Plan's Land Use element. The -Q can be found online through the e-General Plan or in the General Plan itself. e-General Plan: https://docs.vcrma.org/images/pdf/planning/plans/Final_2040_General_Plan_docs/VCGPU_02_Land_Use_Element_2020_09_15_web.pdf General Plan Land Use Element (see PDF page 66, or page 2-64 of the document): https://egeneralplan.vcrma.org/implementation-program/identify-designated-disadvantaged-communities-in-oxnard-and-ventura-planning-areas/

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
76	Email	3/16/2023	N/A	Louise Lampara, Executive Director of the Ventura County Coalition of Labor Agriculture and Business	Thank you for hosting the public meeting additional DDCs. I have been reviewing the information provided on the website, in the FAQs, and during the virtual public meeting and have a few follow-up questions that I'm hoping you can help with: • While SB 53 CalEnviroScreen ranking to establish DDCs, it was my understanding from the virtual meeting, the DDC Study website, and the FAQs that the County is using multiple data sources in its evaluation and analysis. Specifically, at least three data sources: CalEnviroScreen 4.0, data on annual income, and what (for lack of a better term, so please clarify I am using incorrect terminology) may be considered "community of interest" data. What, if any, other data sources are the County considering in its evaluation and analysis? • Would you please share the process so that the public can better understand how the County is using each data source in its analysis and evaluation? • Under AB 617, VCAPCD extensive analysis and evaluation (using, in part, CalEnviroScreen 3.0, local traffic data, local pesticide use data, and local records on health factors) to identify communities at risk. To date, the state has not designated any communities in Ventura County as "at Avenue Area did not even rank as an analysis. • What role is VCAPCD playing in this? • Will the County incorporate, evaluate conclusions regarding communities at risk as part of the DDC study decision-making process? • What is the County's anticipated DDC study and bring the item to the BOS for consideration? Thank you again for the information provided in the virtual meeting and on the website.	Thank you for your comments on the Study of Potential Disadvantaged Community Designations. The Study is evaluating CalEnviroScreen 4.0 data, median household income per census tract as compiled by the United States Census Bureau, and public input received on the Study. The information researched by staff and public input options for potential designation boundaries of disadvantaged communities. Staff is currently preparing a draft include a bibliography of all information reviewed as part of the Study. The report will be presented to the Planning Commission and the Board of Supervisors later this year, along with all public input received. The Planning Commission may recommend designations of disadvantaged communities to the Board, based on the Study and public input received, and the Board will make the final determination regarding the designation of disadvantaged communities. Thank you for your comments and questions regarding AB 617 and VCAPCD (Ventura County Air Pollution Control District) analysis. Staff will look into this matter and address your comments as part of to the Planning Commission and Board of Supervisors. We appreciate your time and participation in the Study. Please feel free to let us know if you have any additional comments. (For additional information regarding AB 617 and APCD's analysis, please refer to the overall response regarding air quality in Chapter 5 of the Study.)
77	Email	3/22/2023	N/A	Jake Rolls	...What would these designations mean for people/ properties within the newly designated areas?	Posters that were used at the recent community meetings are now available online at the following link: https://vcrma.org/docs/images/pdf/planning/ddcstudy/Posters.pdf Poster Board No. 3 (page 4 in the link above) outlines what the designation could mean for people and communities within designated areas. (For additional information, please refer to Chapter 5 of the Study.)
78	Instagram	approx. 3/8/2023	N/A	"@jesus_bautista18"	Don't get rid of the farmers they own those lands without them there's no life	Acknowledged. For additional information, see overall response in Chapter 5 of the Study.
79	Instagram	approx. 3/8/2023	N/A	"@farrondoziert"	The number 11th Best City in California definitely needs to address these issues. @orcasaba is coming to bring some skillsets too.. you can't just talk about it.. mindset shift has to be included too. exclusion is a silent emotional wound. The experience of being left out doesn't just go away on its own	Acknowledged.

Study of Additional Potential Disadvantaged Community Designations

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
80	Facebook	3/4/2023	N/A	Martha Ellen Zordich Trulock	A bunch of gobble de goop political speech that no one understands. Does Disadvantaged also include adverse fallout from Gangs and Drugs?	The commenter's input is acknowledged. The goal of the project is to identify potential disadvantaged communities and present the project's findings to the Planning Commission and Board of Supervisors. If the Board designates any communities identified in the project as a disadvantaged community, staff will incorporate the designated disadvantaged communities into the County General Plan. Disadvantaged communities are low-income areas that are disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation. Although gang activity and drugs are not evaluated in the Study, other socioeconomic factors are considered, such as educational attainment, poverty and income, linguistic isolation, and housing burdens on low-income households. For additional information, see overall response in Chapter 5 of the Study.
81	Facebook	3/3/2023	N/A	Tara Bella Perez Provencher	Why so you can target them for removal and redevelopment	Acknowledged. For additional information, see overall response in Chapter 5 of the Study.
n/a	Facebook	3/3/2023	N/A	Anthony Gaeta	LoL	N/A
81a	Facebook	3/3/2023	N/A	Jennifer LaPlant Freitas	Tara Bella Perez Provencher more likely the option for additional allotment of funds, grants, and growth opportunities/support	Acknowledged. For additional information, see overall response in Chapter 5 of the Study.
82	Facebook	3/3/2023	N/A	Tara Bella Perez Provenche	So gentrification	Acknowledged. For additional information, see overall response in Chapter 5 of the Study.
82a	Facebook	3/3/2023	N/A	Tara Bella Perez Provenche	Gentrification	See response to comment ID #82a.
82b	Facebook	3/4/2023	N/A	KC Rodriguez	Tara Bella Perez Provencher YES!!!! ABSOLUTELY!!	See response to comment ID #82a.
83	Facebook	3/3/2023	N/A	Tara Bella Perez Provencher	A k a : r i c h p e o p l e w a n t t o m o v e i n ... s o	Acknowledged. For additional information, see overall response in Chapter 5 of the Study.
83a	Facebook	3/4/2023	N/A	KC Rodriguez	Tara Bella Perez Provencher right!!!	See response to comment ID #83.
84	Facebook	3/4/2023	N/A	Krystal Villaseñor	Sounds like they want to build a 15min city and this is step 1	Acknowledged. For additional information, see overall response in Chapter 5 of the Study.
n/a	Facebook	3/4/2023	N/A	Candy Jane Moulton Elder	Leslee Owens	N/A
85	Facebook	3/3/2023	N/A	Susie Que	I w i s h t h e y w o u l d d o s o m e t h i n g t o c l S i m i ③ a l l e y	Acknowledged. Census tracts in the unincorporated areas near the city of Simi Valley were not identified as disadvantaged communities in the Study. For additional information, see overall response in Chapter 5 of the Study.

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
86	Facebook	3/4/2023	Ventura	KC Rodriguez	Also would be great if the Socal Gas compressor can get shut down on the avenue of Ventura. These families and those who work in the area are already suffering life health issues because of it, children who live in this area are physically suffering from hypoxia, asthma, headaches and nosebleeds, circulatory inability to produce strong bones, inability to absorb nutrients. Adults are suffering from cancers, heart and blood illnesses, brain fog, tremors, and other issues.	The commenter's input is acknowledged. The County does not have jurisdictional oversight of the SoCal Gas Compressor as the compressor station is located within the city of Ventura. For additional information, see overall response in Chapter 5 of the Study.
87	Facebook	3/3/2023	N/A	Pamela Adams	What does disproportionately burdened by environmental pollution mean?!	Communities that are "disproportionately burdened by environmental pollution" are those within census tracts that exhibit environmental pollution and its adverse effects more than other communities throughout California, as indicated by a score of 75 or above in a statewide screening tool known as CalEnviroScreen.
87a	Facebook	3/3/2023	N/A	Doug Edson	Pamela Adams likely means federal tax dollars.	See response to comment ID #87.
88	Facebook	3/4/2023	N/A	Paul Sandoval	Get off my lawn!!! 🤖 [animated image of Simpson's character shaking fist]	N/A
n/a	Facebook	3/4/2023	N/A	Haas Er	https://vcrma.org/r/DDCStudy/	N/A
89	Facebook	3/4/2023	Oxnard	KC Rodriguez	Would have been great if this board would have voted for the health of the Lemonwood families and those who work in the area.	Acknowledged. The Lemonwood neighborhood is within the jurisdictional authority of the City of Oxnard.
89a	Facebook	3/6/2023	N/A	Marisa Lopez	KC Rodriguez So true. Hopefully something will come of getting this designation for these communities.	Acknowledged. For additional information, see overall response in Chapter 5 of the Study.
90	Facebook	3/6/2023	N/A	KC Rodriguez	Marisa Lopez I feel it's a step that will lead to more gentrification but I surely can be wrong ...	Acknowledged. For additional information, see overall response in Chapter 5 of the Study.
91	Facebook	3/3/2023	N/A	Cliff Bruins	The link doesn't work -zoomwww.vcrma.org	The link was repaired on March 4 when staff was made aware of this comment.

ID	Comment Method	Date	Study Area	Commenter Name	Question/Comment	Response
92	Form	3/26/2023	Santa Paula	Anonymous	<p>5. Option 1 of the Santa Paula study area is where most of the farm working community resides. These are one of the most vulnerable workers since they spend their days outside with low wages and not the best working conditions. The Limoneira packing house is located in Option 1. Most farmworkers only speak Spanish or an indigenous language. Poverty, linguistic isolation, and educational attainment is all seen in the residents in this area. I regularly go running on Santa Paula street towards Cummings Road. I have noticed that some days my asthma flares out more when I'm running in that area. What I imagine are the times pesticide is being applied. I had cousins attending Briggs Elementary school when the 2014 Santa Clara waste water explosion occurred. Children at Briggs Elementary and at Olive Lands had to close down for a day to avoid kids being exposed to the toxic chemicals from the hazardous waste.</p> <p>6. Santa Paula has been experiencing rising housing costs, and so I would say Santa Paula has a housing burden. The study area is where a lot of farm workers and renters reside. In Santa Paula, some renters have been faced with their rent being increased without warning or being told that they have to move out of their complex for renovations only for their place to be put up for sale. I would not be surprised if similar stories have occurred in the study area in Santa Paula. Similar to this reason, since a lot of farm workers work in the study area I would say that there is a linguistic isolation and poverty. In 2014, the Santa Clara waste water on Mission Rock Road exploded. The truck that exploded had illegal chemicals that was expose to the air. For that, I would say the study area in Santa Paula also faces toxic release.</p>	<p>The commenter's input is acknowledged. Although the Study does not directly address issues regarding living and working conditions of farmworkers, rental challenges, and impacts on schools, it is acknowledged that these issues are related to the environmental pollution and socioeconomic indicators considered in the Study. CalEnviroScreen indicators of poverty, linguistic isolation, educational attainment, pesticide use, hazardous waste, and housing burden, are among some of the highest scoring indicators within the census tracts evaluated in the Santa Paula Study Area. For additional information regarding these indicators, refer to Chapter 3 of the Study. For additional information on the issues raised by the commenter and overall repsonses to them, refer to Chapter 5 of the Study.</p>
93	Email	3/27/2023	Santa Paula	Arlene Pinkerton	<p>A copy of the commenter's letter is attached. Summary of comments raised:- Concerns about the Santa Clara Wastewater Facility- Concerns about road safety, clean air and water, dust, trespassers, theft, vandalism- Concerns about hazardous materials, hazardous waste being transported to and stored within Mission Rock area- Supportive of designation in the Mission Rock community area, specifically Option 1; community was historically agricultural prior to existing industrial uses in Mission Rock area- Industrial uses, specifically hazardous waste, are an injustice in the Santa Paula area that is intended to be addressed by the disadvantaged community designation- Concerns about climate change, flooding, and impacts on children- D o e s n ' t h a v e a understanding of CalEnviroScreen scoresSpecific Location: specifically four parcels located at 14230 and 14230 Pinkerton Road, Santa Paula CA; near Santa Clara Waste Water Facility</p>	<p>While the Santa Clara wastewater treatment facility is not part of the Study, the topic of hazardous waste is considered as a CalEnviroScreen environmental pollution indicator, which has a score of 75 or above within the Santa Paula Study Area. CalEnviroScreen air quality and water quality indicators are also considered in the Study. Air quality scores were below 75 within the Santa Paula Study Area, while the Impaired Water Bodies indicator, which evaluates contaminated water bodies, has a score above 75 for two of the census tracts evaluated within the Study Area. For additional information on CalEnviroScreen indicators and its scoring methodology, please refer to Chapter 3 of the Study. The commenter's input regarding the road safety, schools, and climate change are further addressed in the overall responses in Chapter 5 of the Study. All other comments and concerns raised by the commenter are acknowledged.</p>

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March 13, 2023

City of Santa Paula Designation of Disadvantaged Community

On behalf of Santa Paula Latino Town Hall we thank the County of Ventura for providing opportunity for public comment on the proposed designation of disadvantaged community. We regret that advance notice was so limited that it prevented grass root organizations such as social justice and civil rights advocates to research criteria, prepare written comment and plan for turn out for this important meeting.

Santa Paula's population is nearly 30% children under age 18 years. According to the state's criteria and brief review of the Calenviroscreen, Santa Paula meets all of social determinants of health impacts, including poverty rates, linguistic isolation, high cost and lack of availability of housing, high unemployment, low educational attainment, high rates of asthma and cardiovascular disease and diabetes and obesity rates. ***In addition, according to the California Department of Public Health data identified in Ventura County's PH Needs Assessment document, there are structural inequities, socio-economic, and political drivers are part of the framework that endangers our resident's health, life expectancy and quantify the factors that shape health.***

According to the Gold Coast Health Plan the County's managed care system for all Medi-Cal recipients, there are approximately 240,000 low income recipients. The majority reside in Oxnard and Santa Paula.

Comment 59a

You know our history that this current community center site sits about 2 miles from the 2014 chemical explosion that resulted in permanent injury and widespread adverse environmental exposure to our city.

Poverty, low educational attainment, linguistic isolation, health needs, and unemployment, cost and lack of adequate housing create stress, concerns of ability to access health care information, public services, and regulatory processes like this one. Lack of English proficiency often results in racial discrimination, and reduced quality of life. Public health and social service departments are hampered with the ability to conduct necessary studies that would help reduce racial and ethnic disparities due to language barriers and inability to outreach on private ranch properties where the farm worker community work.

In the event of accidental chemical release of a spill such as happened in 2014 less than 2 miles from this community center, linguistically isolated persons may not receive timely info.

The health and wellbeing of all people and communities is essential to a thriving, equitable society. Investing to achieve the full potential for health and well-being for all provides valuable benefits to society.

One way of eliminating health disparities is to designate the proposed areas as Designated Disadvantaged Community.

Laura Espinosa 

Immediate Past President

Santa Paula Latino Town Hall

Votelaura1@gmail.com

(805) 407-1608

Nguyen, Jessica

From: Valerie Lopez <valerie@teo-law.com>
Sent: Monday, March 27, 2023 11:29 AM
To: Study of Potential Disadvantaged Community Designations
Cc: Thomas E Olson; Arlene Pinkerton
Subject: Study of Potential Disadvantaged Community Designations
Attachments: County Input.pdf

WARNING: If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to Email.Security@ventura.org.

Good morning County of Ventura,

On behalf of Arlene Pinkerton, this office is submitting the attached Provide Your Input sheet.

If you have any questions, please do not hesitate to call or email.

Sincerely,

Valerie Lopez, Legal Assistant & Notary Public
THOMAS E. OLSON, A Professional Law Corporation
2590 E. Main Street, Suite 106
Ventura, CA 93003
Phone: (805) 628-9256
Fax: (805) 628-9153
Email: valerie@teo-law.com
Website: <https://teo-law.com/>

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PROVIDE YOUR INPUT

Fill out the information below to provide your input related to the Study of Potential Disadvantaged Community Designations. Alternatively, you may also fill out this form online, email your input to DDC@ventura.org or mail in your input at County of Ventura, Planning Division, Attn: Jessica Nguyen, 800 S. Victoria Avenue L#1740, Ventura, CA 93009. Input will be accepted through March 27, 2023.

Name (optional): Arlene Pinkerton

Affiliation/Agency (optional):

Please select the Study Area you are providing input for (please select one):

☐ Ventura

☒ Santa Paula

☐ Oxnard

If you would like to provide input on a specific location within the Study Area you selected, please describe that location (Examples: major cross street intersection, street name, neighborhood name, common landmark, etc.).

See attached.

Please describe how you have been impacted by one or more of the pollution burdens and population characteristics identified in the Study Area you are providing input for.

See attached.

Please describe the pollution burdens or socioeconomic burdens that you believe have a disproportionate impact on the Study Area but were not identified in the Study.

See attached.

Additional comments:

Comment 93



Project Website
vcrma.org/ddcstudy



Frequently Asked
Questions
vcrma.org/ddcstudy-faq



Provide Your Input
vcrma.org/ddcstudy-input



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Study of Potential Disadvantaged Community Designations

PROVIDE YOUR INPUT

Attachment from
Arlene Pinkerton
c/o Thomas E. Olson
Thomas E. Olson, A Professional Law Corporation
2590 East Main Street
Suite 106
Ventura, CA 93003
tom@teo-law.com

March 27, 2023

Study Area - Santa Paula

Specific Location within the Study Area:

I own land immediately to the east of the Mission Rock Road area. Specifically:

Agricultural land, consisting of *four parcels*, located at 14230 and 14230 Pinkerton Road, Santa Paula, California, 93060:

APN 099-0-060-445 - Consisting of approximately 23.01 acres with personal residence, address 14230 Pinkerton Road, Santa Paula.

APN 099-0-060-455 - Consisting of approximately 9,435 square feet, adjacent to 14230 Pinkerton Road.

APN 099-0-060-465 - Consisting of approximately 7.94 acres, 14230 Pinkerton Road.

APN 099-0-060-475 - Consisting of approximately 1,029 square feet, adjacent to 14230 Pinkerton Road

I also own a Well Site in the same area just north of Pinkerton Road.

APN 099-0-060-205 Consisting of a parcel of land of approximately 625 square feet, adjacent to 14235 Pinkerton Road

All of this land is within a mile of the old Santa Clara Waste Water Facility.

Please describe how you have been impacted by one or more of the pollution burdens and population characteristics identified in the Study Area you are providing input for:

I am very familiar with that agricultural area at the south end of Briggs Road which runs southeast and southwest of the 126 Freeway. My parents, Wesley and Betty Pinkerton, lived and farmed there. My parents built a house which still stands to raise their three children. I am one of their daughters. I now own the family property that lies to the east of Mission Rock Road as

noted above.

I can remember when the Mission Rock Company was first given permission to begin mining the river bottom. My parents objected because it would interfere with their farming business and family life. Mission Rock's big yellow cement trucks began hauling out gravel on the narrow road there at the same time I was beginning elementary school. Mission Rock quarrying activities went on for 30 years. Ultimately they were stopped because they mined below the red line and lowered the water table. This then contributed to the sea water intrusion issues which necessitated the creation of the Freeman Diversion Project. There are many industrial businesses operating in what is now referred to as the Mission Rock Community.

I can remember how infuriated my father was when he learned that the County had given out more CUPs to other people in the riverbed including the one for the Santa Clara Waste Water Facility site in 1959. The type and quantity of vehicles using the road has greatly influenced that area and changed its character.

After Wesley Pinkerton's death in 1989, his wife, my mother, Betty Pinkerton, attempted to bargain with the Mission Rock Community. She had an attorney draw up an agreement where Mission Rock businesses would agree to provide things like fencing and city water in exchange for her permission to pass over her private road. After the agreement was signed by everyone, the Mission Rock people said they could not pay for the conditions. This was very discouraging for my mother who had attempted to make a settlement reasonable for everyone. It is just indicative of the problems we have had over the years. Betty Pinkerton continued farming the area until she died in 1995. At that time, her son, my brother, Murray Pinkerton, took over caring for the property which was planted in citrus trees. He dealt with the issues since he lived there on the same property. In 2014 there was an explosion at the Santa Clara Waste Water Facility. Murray experienced the noise and the jolt of the explosion at his house at 3:30 am in the morning, and then the ensuing confusion, and disbelief in the aftermath of the explosion. Murray Pinkerton continued to farm the citrus until he died in 2017. I am now responsible for the farm and am grateful that I have found responsible and competent lessees.

The original CUP for the Santa Clara Waste Water Facility was issued in 1959. That was before enactment of the California Environmental Quality Act (CEQA). The waste water facility has been closed since the explosion 9 years ago. Now the County is being asked to consider a new application, with a full Environmental Impact Report. The meetings in 2022 showed that the community does not want this facility, and feels that Santa Paula is being made a dumping ground for other communities who, being more affluent, do not want to deal with such a facility in their own back yard. This injustice deals directly with the issues intended to be addressed by the Disadvantaged Community Designation legislation.

When the Ventura County Jail was allowed into the greenbelt, it was agreed that Shell Road would be closed to its traffic and the jail would not be allowed to use the Briggs Road off ramp. The RI-NU CUP proposal presented in the past would seek to permit 150 truck trips A DAY off Briggs Road.

My family has borne the burden of encroachment of industry into what had been historically a farming area. There was oil there but my parents did not own the oil rights. Road safety issues, concerns about clean air and water, increasing dust, trespassers, theft, vandalism were issues that my parents dealt with, my brother dealt with, and now I am dealing with. These concerns have fallen upon deaf ears. At least in 2022 the County at least required the creation of a full EIR before consideration of reopening of the RI-NU facility. But that took a major uprising of opposition in the community. Inclusion of this area in a Disadvantaged Community Designation will force the county to take into consideration the adverse impacts that have been created by the industrialization of the area which was originally agricultural only, and the impact on the lives, health and well-being of the residents of Santa Paula.

Just as an example, RI-NU applications made much of the claim that the waste stream coming onto the property is not “hazardous” in accordance with official governmental determinations of such things. The prior operator certainly sent some radioactive waste down the pipeline, so where did that come from? It must have been in the waste taken to the site. It appears that the new operator will be seeking to process from the same places that used it before. In addition, *hazardous materials are an intrinsic part of the treatment of the waste stream.* It was hazardous chemicals on the premises for treatment of waste stream that caused the explosion. So this will be a delivery point and storage facility for hazardous materials, which will be actively used in the treatment of the waste stream. The Disadvantaged Community Designation for this area presented in Option 1 will force the County to take all of this into consideration when permitting further uses in this area. Santa Paula needs the protection of the designation so that it is not subjected to the depredations of business interests looking to find some “out of the way” place to deal with treatment of other communities’ waste.

My father remembered the St. Francis Dam disaster of 1928 along this same Santa Clara River. While there is no St. Francis Dam any longer, there are other dams upstream. There is the question of climate change (which certainly changes the risks since 1969). The last flood came down that river into Ventura in 1969. What would happen to the hazardous materials stored on site if a flood came down the river?

Again as another example, the truck traffic down to the proposed RI-NU facility from the freeway would go directly along two boundaries of my property. That means exhaust, dust, fumes are impacting my property, planted to row crops, every day. That pollution also affects all of western Santa Paula. What about the hazardous materials being transported onto the proposed RI-NU site to carry out its decontamination tasks? What if there is a collision? Will the testing required at the gate slow down traffic so much that we will have stopped trucks backed up for miles leading to this facility? These types of issues have a bearing on the entire community of Santa Paula.

Of the options being considered, I favor Option 1 which will include the Mission Rock Road area within the proposed Disadvantaged Community finding for the Santa Paula Study Area.

Please describe the pollution burdens or socioeconomic burdens that you believe have a

disproportionate impact on the Study Area but were not identified in the study.

I do not have a copy of the study's underlying data to understand, for example, the score of 96 for pesticide use in Santa Paula, or the 96 score for impaired water bodies, or the 89 rating for the hazardous waster, or the 80 for childrens' lead risk from housing, or the score of 84 on educational attainment. I am a retired school teacher. I care about the impacts on children. Santa Paula needs the protection of special scrutiny for future development in the area so that one of the poorer communities in the county is not unfairly and disproportionately burdened with development that other communities refuse to permit in their back yard.

Appendix D

Comparison of Areas Included in Options Explored

Areas Under Consideration for Inclusion in a Potential DDC	Qualifying Census Tracts	Option 1	Option 2	Option 3
Potential Ventura Avenue DDC				
Residential Uses				
Unincorporated residential neighborhoods along North Ventura Avenue		✓	✓	✓
Two mobile home parks along North Ventura Avenue		✓	✓	✓
Other Land Uses				
Portions of agricultural and open space land adjacent to the City of Ventura*	✓	✓	✓	
Portions of industrial areas located immediately along the southern portion of unincorporated North Ventura Avenue	✓			
Portions of industrial areas located immediately along unincorporated North Ventura Avenue and Crooked Palm Road, such as, but not limited to, the Pepsi Bottling Facility and Petrochem site		✓	✓	
Potential Santa Paula Unincorporated DDC				
Residential Uses				
Farmworker housing community at Pine Road and Foothill Road		✓		✓
Farmworker housing community at Wheeler Canyon Road		✓		✓
Residential neighborhood along South Mountain Road	✓	✓		✓
Schools				
Olivelands		✓		✓
Briggs		✓		✓
Mupu Elementary	✓	✓	✓	✓
Santa Clara Elementary		✓		✓
Thomas Aquinas College	✓	✓		
Existing Communities				
West Santa Paula		✓	✓	✓
North Santa Paula*	✓	✓	✓	✓
East Santa Paula (commercial uses only)	✓	✓		

Study of Additional Potential Disadvantaged Community Designations

Areas Under Consideration for Inclusion in a Potential DDC	Qualifying Census Tracts	Option 1	Option 2	Option 3
Mission Rock Road (industrial uses only)	✓	✓		
Other Land Uses				
Large swaths of unincorporated agricultural and open space lands*	✓	✓		
Todd Road Jail	✓	✓		
Toland Landfill		✓		
Potential Oxnard Plain DDC				
Residential Uses				
Farmworker housing community at Pleasant Valley Road	✓			✓
Three mobile home parks located along southbound Pacific Coast Highway	✓			✓
Schools				
Laguna Vista Elementary School				✓
Other Land Uses				
Large swaths of unincorporated agricultural lands containing agricultural and oil drilling operations*	✓			
*Areas included may vary between options. Refer to map figures in the Study.				