



Planning Commission Staff Report – Hearing on October 5, 2023

County of Ventura • Resource Management Agency

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SUBJECT: Public Hearing to Consider and Make Recommendations to the Board of Supervisors Regarding the Study of Additional Potential Disadvantaged Community Designations in the Unincorporated Areas of Ventura County Pursuant to General Plan Implementation Program Q in the Land Use Element (Case No. PL23-0033).

A. PROJECT INFORMATION

1. **Applicant:** County of Ventura

2. **Location:** Study Areas (defined in section 5 below) in the unincorporated areas of Ventura County, specifically near the cities of Ventura, Santa Paula and Oxnard (see Figure 2).

3. **Recommended Actions:** Planning Division staff requests that your Commission: 1) review this staff report and its attachments; 2) consider the research findings and designation options set forth in the *Study of Additional Potential Disadvantaged Community Designations* (the Study) and this staff report; 3) make a recommendation to the Ventura County Board of Supervisors (Board) to select Option 3 to define the boundaries for the designation of additional disadvantaged communities in the 2040 General Plan (General Plan); and 4) recommend that the Board direct Planning staff to process a General Plan amendment (GPA) to update the maps and list of low income and disadvantaged communities in the General Plan and the General Plan's Background Report to include the designated disadvantaged communities (DDCs) identified by Option 3. Any GPA to designate additional disadvantaged communities will be presented to your Commission and the Board in a subsequent hearing process.

4. **Review/Decision-Making Authority:** General Plan Implementation Program Q in the Land Use Element (Program LU-Q), *Identify Designated Disadvantaged Communities in Oxnard and Ventura Planning Areas*, states, "Within one-year of 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 [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."

Planning Division staff has completed research pursuant to Program LU-Q and is presenting the results of the research to your Commission here. The Study analyzes the identification of potential disadvantaged communities within the unincorporated areas near Ventura, Santa Paula, and Oxnard. A GPA is required to designate additional areas as disadvantaged communities. In light of the analysis and findings set forth in the Study and this staff report, Staff is requesting that your Commission recommend the designation

of additional disadvantaged communities in the General Plan pursuant to Option 3 and recommend that a GPA be processed to effectuate those designations.

5. Technical Terms and Definitions: Definitions for key terms used throughout this staff report are set forth below to aid your Commission and the public in reviewing this item:

Area of Interest: A plan adopted by the Ventura County Local Area 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 (as currently defined in the General Plan): 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 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),² 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.

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

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/.

² As explained in section 7.b below, a CalEnviroScreen score of 75 means that the census tract scored higher than 75 percent of all other census tracts in the state. A high overall percentile score means that the census tract is more vulnerable to potential exposure of pollutants than other census tracts.

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

Qualifying Census Tracts: CalEnviroScreen, the online mapping software developed by OEHHA and used by the 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 that include areas at or above 75 percent as 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.

Study Area: Unincorporated areas within the Ventura Planning Area, Santa Paula Planning Area, and Oxnard Planning Area, which are coterminous with 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 “Study Areas” for purposes of this project.

6. Introduction and Background: The Planning Division initiated a major update of the Ventura County General Plan in 2016. Part of this update included integration of the requirements of Senate Bill (SB) 1000, 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 risks in disadvantaged communities by means 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(h)(1)(A).)

On September 15, 2020, the Board adopted the current 2040 General Plan and certified the General Plan’s Environmental Impact Report (EIR) and related documents. The areas of Saticoy, El Rio/Del Norte, and Piru are identified as DDCs in the General Plan.³ Figure 2-6 in the General Plan (Exhibit 2) shows the existing DDC boundaries in red and the census tracts that were evaluated in these areas in yellow.

³ 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. The Area Plan boundaries were determined at the time 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.

The General Plan also includes Implementation Program LU-Q. As noted in section 4 above, Program LU-Q requires that the County research the southwestern and northwestern Oxnard Planning Area and along the Ventura Avenue in the Ventura Planning Area using CalEnviroScreen to identify DDCs. In order to implement Program LU-Q, Planning Division staff has prepared the Study (Exhibit 1), which includes detailed evaluations of potential DDCs based on CalEnviroScreen data, as well as County data, public comments received during public engagement, and options explored to identify potential disadvantaged communities.

To conduct the Study, Planning staff initially identified qualifying census tracts (see definition above in section 5) to evaluate areas for potential designation. However, staff found that the potential designation of qualifying census tracts was both over- and under-inclusive, leaving some neighborhoods outside of its scope, while including large swaths of sparsely populated open space or agricultural lands. Therefore, staff explored alternative options to identify potential disadvantaged communities under Program LU-Q to address these limitations. 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 engaged with communities within the Study Areas to present Options 1 and 2. Results of the public engagement process are discussed in section 7.d.5 of this staff report.

Staff conducted further analysis following public engagement to consider the public input received, state guidelines on identifying disadvantaged communities, and the application of existing General Plan policies that address environmental and socioeconomic disparities in DDCs. These considerations resulted in the development of Option 3, which focuses on residential areas and schools within the Study Areas, and excludes large swaths of agricultural and open space lands. Thus, staff requests that the Planning Commission make a recommendation to the Board that Option 3 be selected to identify the boundaries of additional DDCs to be included in the General Plan. Implementation of General Plan policies that address environmental and socioeconomic disparities in DDCs would be most beneficial in these communities, as compared to those areas identified in Options 1 and 2.

7. Project Description:

The Study and its related findings, as well as a summary of the public engagement process conducted by staff, are described in the following sections of this staff report.

a. Legal Background

SB 535 and CalEPA Designated Census Tracts in Ventura County

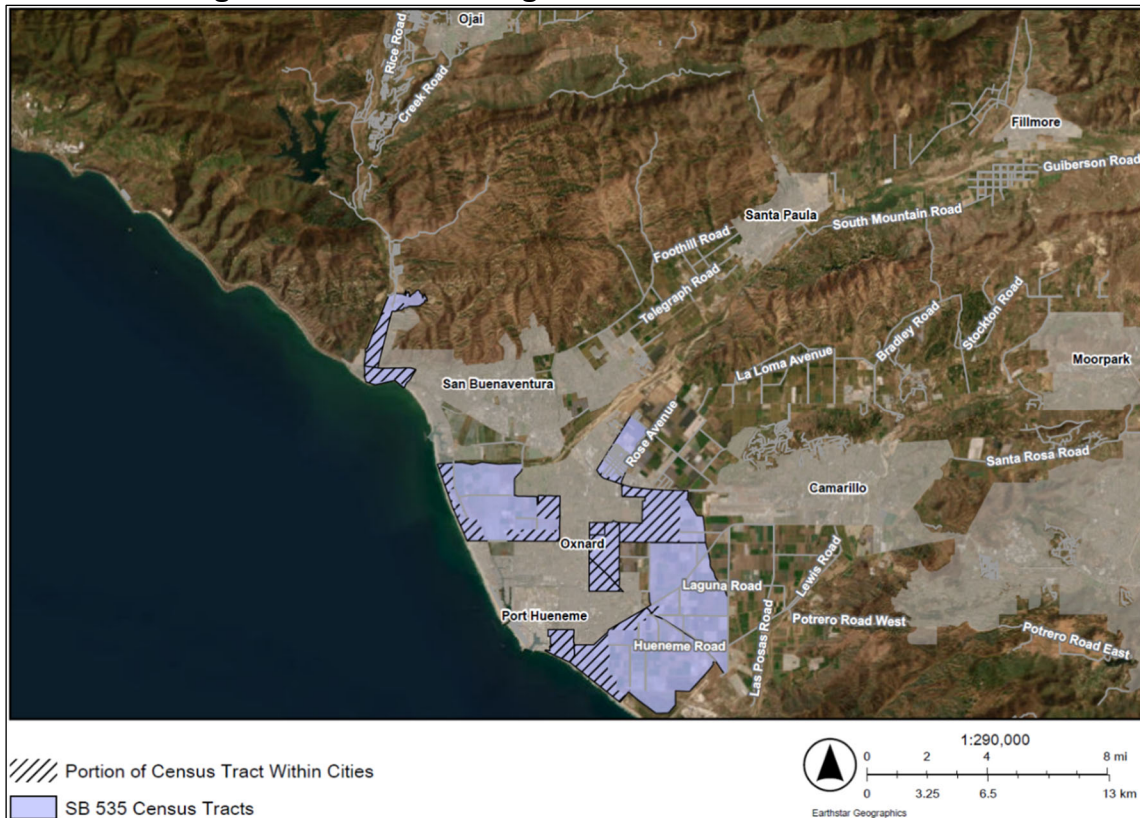
There are several state laws that address disparities in disadvantaged communities. One of these is SB 535, which specifically identifies disadvantaged communities for investment of state Cap-and-Trade Program funds (also referred to as the Greenhouse Gas Reduction Fund). These investments are aimed at improving public health, quality of life and economic opportunity in California's communities most burdened by environmental pollution, and at the same time, reducing pollution that causes climate change. The method developed by the state to implement SB 535 is important to understand given the County's ongoing process to identify DDCs within its jurisdiction and is therefore described in greater detail below.

In 2012, SB 535 established minimum funding requirements from the Greenhouse Gas Reduction Fund to be allocated to disadvantaged communities and tasked CalEPA to identify those communities, stating that CalEPA's designation of disadvantaged communities must be based on "geographic, socioeconomic, public health, and environmental hazard criteria". In 2013, OEHHA developed CalEnviroScreen to identify census tracts throughout the state that meet the definition a disadvantaged community pursuant to SB 535 (codified at 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 below in section 7.b.

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:

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 "pollution burden."
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 designated census tracts.

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

Figure 1: CalEPA Designated SB 535 Census Tracts

SB 1000 and Locally Designated Disadvantaged Communities

The Governor's Office of Planning and Research (OPR) is required by Government Code section 65040.2 to adopt and periodically revise the State General Plan Guidelines for the preparation and content of general plans for all cities and counties in California. The State General Plan Guidelines (State Guidelines) serve as the "how to" resource for drafting a general plan. OPR issues technical advisories 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). The County's adopted General Plan and this Study follow OPR's State Guidelines.

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. Here, community input was particularly impactful in Planning staff's identification of the boundaries set forth in Option 3 in the Study.

b. Study Parameters

CalEnviroScreen and Income Data

Program LU-Q required extensive research and analysis using CalEnviroScreen data. 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 indicators⁴, 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. For example, a score of 75 means that the census tract scored higher than 75 percent of all other census tracts in the state. A high overall percentile score means that the census tract is more vulnerable to potential exposure of pollutants than other census tracts.

CalEnviroScreen version 3.0 was used during the County's General Plan Update project to identify DDCs. In October 2021, OEHHA released version 4.0. Using CalEnviroScreen 4.0 for the current Study, Planning Division staff found that 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. With this additional Study Area as well as a robust public engagement effort, the LU-Q implementation schedule has taken longer than originally anticipated.

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 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).

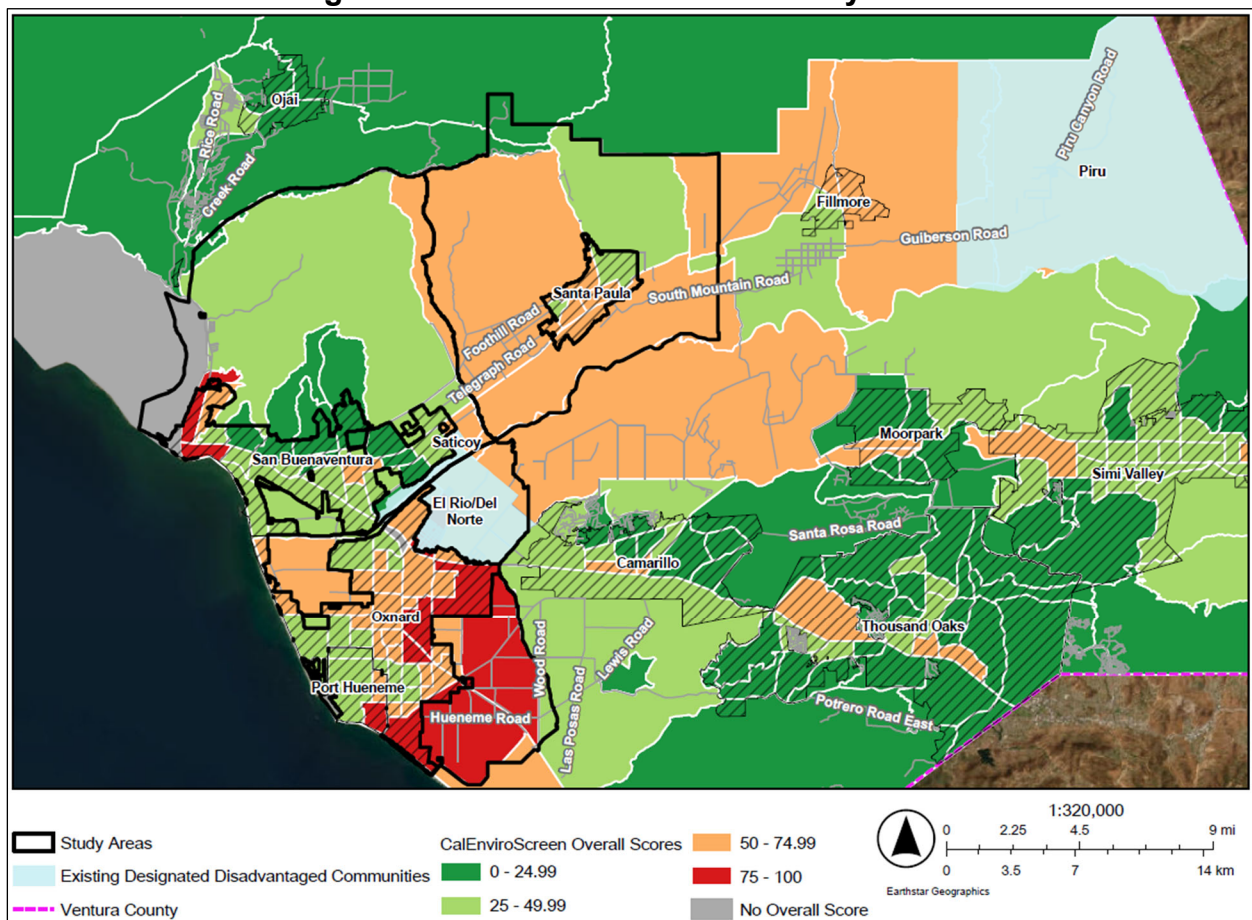
⁴ Detailed information about each CalEnviroScreen indicator is available online at oehha.ca.gov/calenviroscreen/indicators and in the CalEnviroScreen 4.0 Report at oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf.

Staff compared the mean median household income of each census tract studied to 80 percent of the statewide median income set by HCD.

Study Areas and Census Tracts Evaluated

While Program LU-Q specifically referenced “Planning Areas” as the geographic basis for the Study, “Planning Areas” will hereafter be referred to as Study Areas to minimize confusion with other commonly used land use planning terms. Definitions of these terms are provided in section 5 above. Cities within the Study Areas are excluded from evaluation as the County does not have jurisdictional authority over land use policies within cities. Figure 2 shows the Study Area boundaries and the census tracts that are located entirely or partially within the Study Areas.

Figure 2. Census Tracts Within Study Areas



After reviewing census tracts that are located within the Study Areas (as shown in Figure 2), staff further focused on qualifying census tracts with scores at or above 75 percent as identified by the CalEnviroScreen, or with median household incomes at or below 80 percent of the statewide median income. These tracts are shown in Figure 3 and summarized in Table 1.

Figure 3. Qualifying Census Tracts within the Study Areas

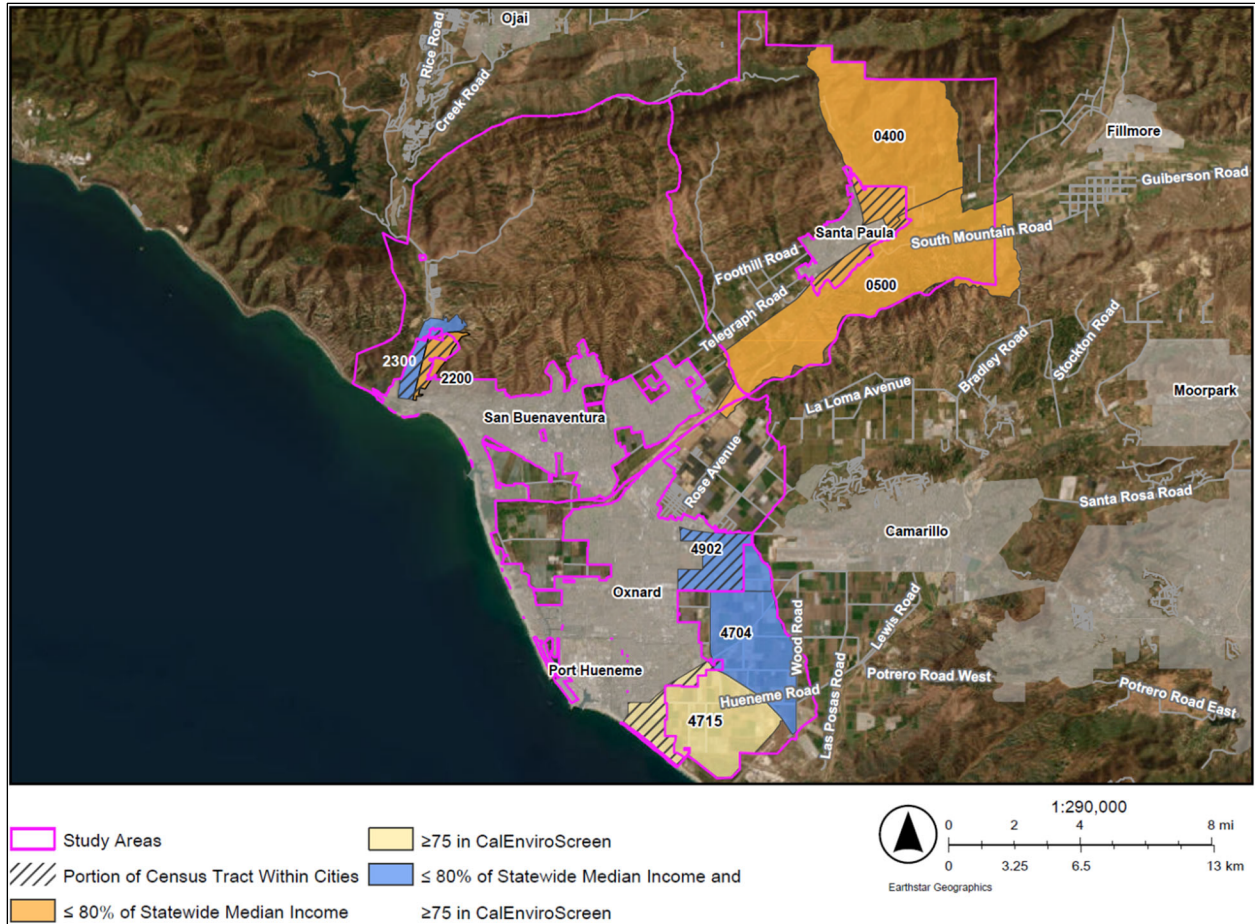


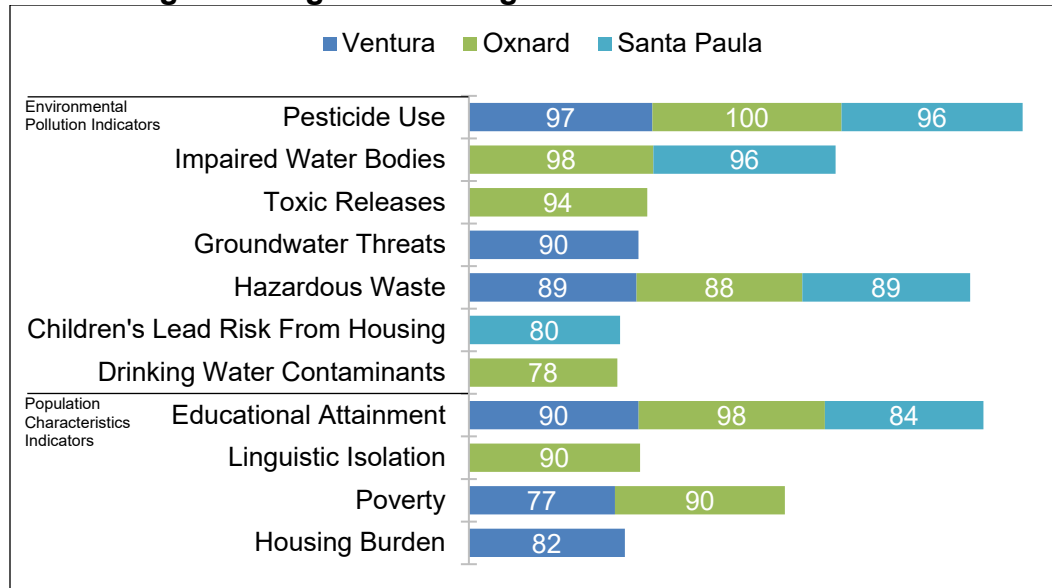
Table 1. Qualifying Census Tracts within the Study Areas

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

Highest Scoring CalEnviroScreen Indicators

Figure 4 below shows the highest scoring CalEnviroScreen indicators in each Study Area. Each indicator is described in further detail in Chapter 3 of the Study.

Figure 4. Highest Scoring CalEnviroScreen Indicators



In light of the highest scoring CalEnviroScreen environmental pollution indicators shown in Figure 4, local County information was also reviewed, which includes information from the County's Pesticide Use Enforcement Program administered by the County Department of Agriculture/Weights & Measures, water resources information from the Public Works Agency, and information related to hazardous waste and hazardous facilities from the Environmental Health Division. Staff found that local County information supports the information compiled by CalEnviroScreen. Summaries of local County information are provided in Chapter 3 of the Study (sections 3.2.2 through 3.2.7) for the following indicators: Drinking Water Contaminants, Groundwater Threats, Hazardous Waste, Impaired Water Bodies, Pesticide Use, and Toxic Releases.

Review of Other Screening Tools

Other state and federal agencies use different screening tools to help identify disadvantaged communities as required by state law or federal initiatives. Staff reviewed some of these screening tools to compare different methodologies and to determine how communities were identified using these tools as compared to those identified by CalEnviroScreen. Table 2 below summarizes the screening tools that were reviewed. Overall, the areas identified as disadvantaged in one or more of these screening tools are similarly aligned with the qualifying census tracts in the Study, or with DDCs already identified in the General Plan.

Table 2. Other Disadvantaged Community Screening Tools

Name of Screening Tool	Managing Agency/Institution	Qualifying Census Tracts in the Study that are Identified by Other Screening Tools
Disadvantaged Communities Mapping Tool	State Department of Water Resources	2300, 0400, 0500, 4902
Statewide Disadvantaged Unincorporated Communities Map	California Association of Local Agency Formation Commissions	Areas identified are within DDCs established in the General Plan
Climate and Economic Justice Screening Tool	United States Council on Environmental Quality	2300, 0400, 0500, 4902, 4715, 4704
Environmental Justice Areas Map	Southern California Association of Governments	2300, 0400, 0500, 4902, 4715, 4704
REAP 2.0 Indicator Mapping Tool: Communities of Concern Map Layer	Southern California Association of Governments	Areas identified are within DDCs established in the General Plan
REAP 2.0 Indicator Mapping Tool: TCAC HCD Opportunity Boundary Map Layer	Southern California Association of Governments	2300, 0400, 0500, 4902, 4715, 4704

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

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 3 below and as outlined in Exhibit 3. 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 3. DDC Goals, Policies, and Programs in the General Plan

Category	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
Coordination & Collaboration	Coordination and collaboration efforts between the County and other public entities, private entities, the public, and	20

Category	Description	Total Count
	other stakeholders to increase equity and consider the needs of designated disadvantaged communities.	
Planning & Policymaking	Development of plans and policies with a focus on designated disadvantaged communities.	14
Services & Infrastructure Investment	Development or enhancement of County-provided public services and infrastructure within designated disadvantaged communities.	17

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.

It is important to note that General Plan policies and programs associated with DDCs are newly adopted policies and programs that were not previously included in the County's General Plan prior to September 2020. Thus, these policies and programs are in their early stages of implementation. Table 4 below summarizes how staff anticipates implementing these policies and programs. 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 4. 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. 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.
Coordination & Collaboration	<ul style="list-style-type: none"> Consider engagement techniques that make it convenient, accessible, and easy to understand and promote participation from community members.
Planning & Policymaking	<ul style="list-style-type: none"> 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,

Category	Potential Implementation Strategies
	<p>radio, and community-wide communication channels such as mobile texting and social media.</p> <ul style="list-style-type: none"> 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 and coordinating or participating in communitywide events.
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, staff 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 staff's preliminary research of DDC policy implementation efforts from other jurisdictions, and in discussion with OPR, staff has not found examples of applying setbacks, buffer areas, or other best practices for addressing development review within or adjacent to a DDC. If the Board recommends the designation of potential

disadvantaged communities identified in this Study, it would be valuable for staff to explore a range of setback distances or buffer areas as formal future legislative work. Your Commission may make additional suggestions or considerations for staff and the Board on setback or buffer implementation tools.

Grant Funding

The County's identification of a DDC may improve the likelihood that grant applications would be approved for 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 within a DDC 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.

d. Options for Designating Disadvantaged Communities

Staff analyzed the potential designation of disadvantaged communities using qualifying census tracts within the Study Areas based on the information outlined in section 7.b above. However, as explained in further detail below, staff identified critical limitations to this approach. Thus, staff first explored two alternative options (Options 1 and 2) to identify disadvantaged communities based on research of local data and individual CalEnviroScreen indicators. Option 1 identifies potential disadvantaged communities based on broad geographic areas, while Option 2 is based on geographic areas within Existing Communities as defined in the General Plan. 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. Map depictions of each option are provided in Exhibits 4, 5, and 6. Exhibit 7 provides a comparison table of the options explored by staff, which outlines key geographic areas that would be included in a potential DDC under each option. The following sections discuss in chronological order the steps staff took in developing and studying these options.

1. Identification of DDCs Using Qualifying Census Tracts

The areas identified as a “qualifying census tract” subject to this Study are identified in Table 1, above. As noted elsewhere in this staff report, staff 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.

2. Alternative Options Explored to Identify DDCs

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

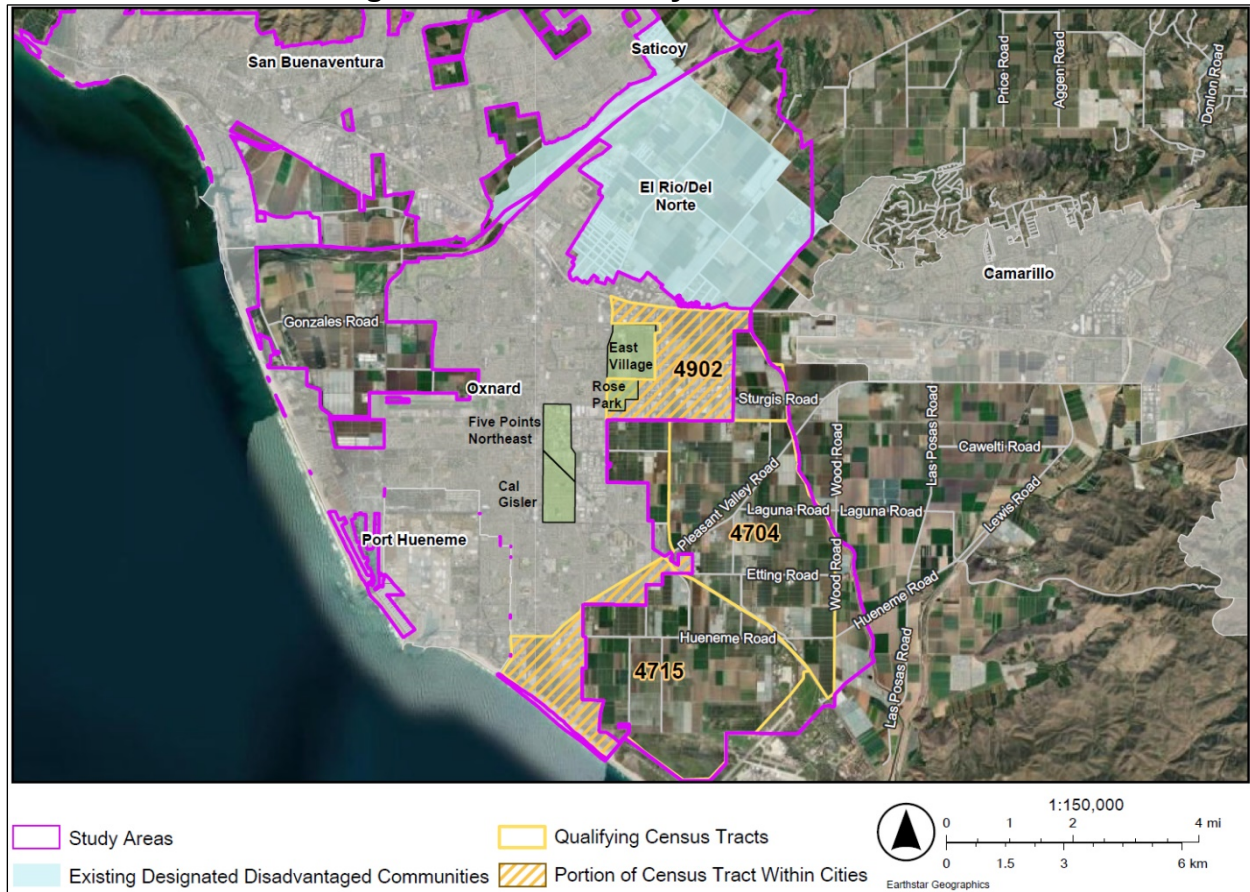
- Focus on residential areas;
- Include only unincorporated areas, as the County does not have jurisdictional authority over portions of census tracts within incorporated areas; and
- Develop designation methodologies that are objective and transparent and can be used in future applications for evaluating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

Applying the State Guidelines explained in section 7.a above, 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 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.

It should be noted that under Options 1 and 2 described above, no additional disadvantaged communities within the Oxnard Study Area were initially identified (see Figure 5). 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 5. Oxnard Study Area Overview



Note: The City of Oxnard's adopted and certified 2021-2029 Amended Housing Element defines disadvantaged communities as those with CalEnviroScreen 4.0 scores of 75 or higher. This process resulted in the identification of Rose Park, Five Points Northeast, East Village, and Cal Gisler as disadvantaged communities within the city.

3. Identify DDCs Using Option 1

Option 1 is consistent with the methodology used to identify DDCs in the General Plan for the Saticoy, El Rio/Del Norte, and Piru areas. The following points should be taken into account when considering the application of Option 1 (see also Exhibit 7):

- 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 CalEnviroScreen, such as Children's Lead Risk from 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.

Maps depicting Option 1 are provided in Exhibit 4.

4. Identify DDCs Using 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)⁵, 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 7.d.6 below). The following points should be taken into account when considering the application of Option 2 (see also Exhibit 7):

- 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 CalEnviroScreen, such as Children's Lead Risk from 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.
- 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.

⁵ Disadvantaged unincorporated communities are defined in SB 244 as an area of "inhabited territory" in 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 be "inhabited territory."

Maps of Option 2 are provided in Exhibit 5.

5. Public Engagement

Outreach Process

To better inform staff's research, staff engaged in public outreach on Options 1 and 2 within the Study Areas. In preparation for community engagement, staff coordinated with the cities of Ventura, Santa Paula, and Oxnard to address potential concerns that span across jurisdictional boundaries. In addition, staff consulted with other County agencies to evaluate CalEnviroScreen indicators and strategies for public outreach, including the Department of Agriculture/Weights & Measures, Environmental Health Division, Public Works Agency, the Public Information Office, and the Office of Diversity, Equity, and Inclusion. Table 5 summarizes the public outreach process, which is explained in further detail below.

Table 5. Summary of the Public Outreach Process

Date	Event	Type of Coordination
August 29, 2022	Community Connectors Workshop	Met with a group of "Community Connectors"
February 15, 2023	Central Coast Alliance United for a Sustainable Economy (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
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

A virtual workshop was held in August 2022 with key community stakeholders ("Community Connectors") identified in consultation with the Ventura County Public Information Officer and the Board of Supervisors District offices. The purpose of this workshop was to discuss ideas and best practices for conducting successful public

engagement within the Study Areas. Ten Community Connectors participated in the workshop, which included community representatives from community-based organizations, nonprofit organizations, and public agency staff. Chapter 5 of the Study details the results of the workshop and the suggestions staff implemented as part of future outreach.

On February 24, 2023, bilingual public meeting announcements 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 the County's social media 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 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 question-and-answer sessions, comment forms, and an online form accessible through the project website. The Planning Division's address was posted on the project website, during presentations, and on handouts for those who chose 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.

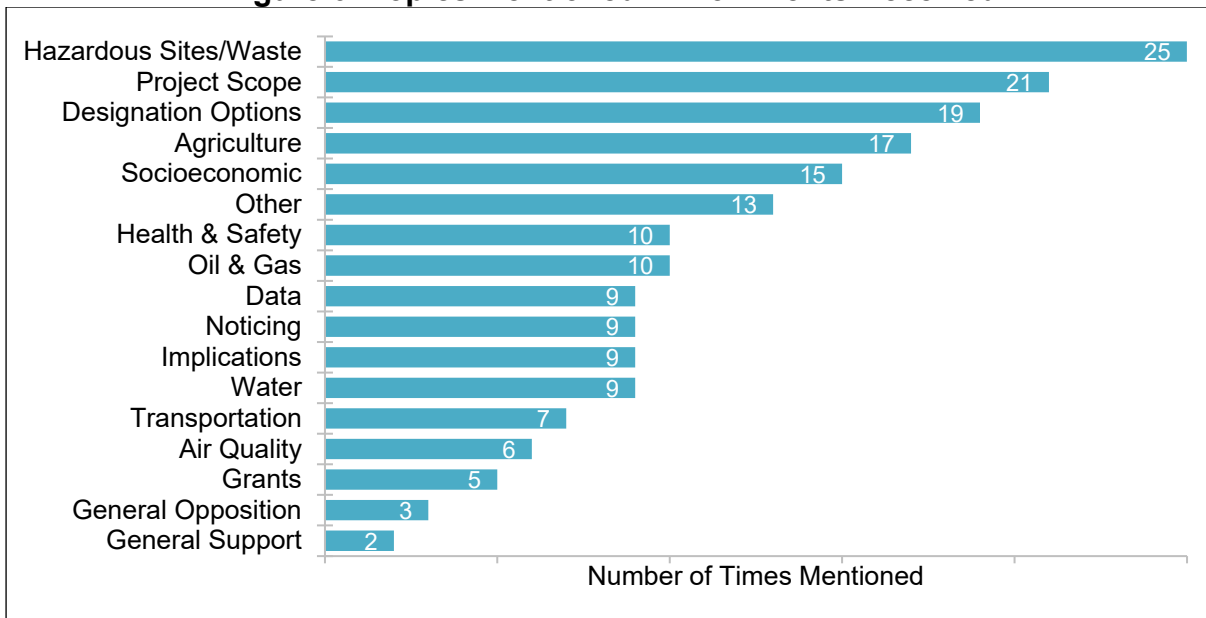
As summarized in Table 5 above, the public meetings were promoted through coordination with CAUSE and the Westside Community Council (in Ventura), a press release emailed to local media outlets and posted on the County's online news webpage, email notifications to community stakeholders, social media 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.

Public engagement materials 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 (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. Among the materials is a list of Frequently Asked Questions (FAQs) that was made available online as a webpage, in PDF format, and in print, and were distributed at public meetings.

Public Feedback

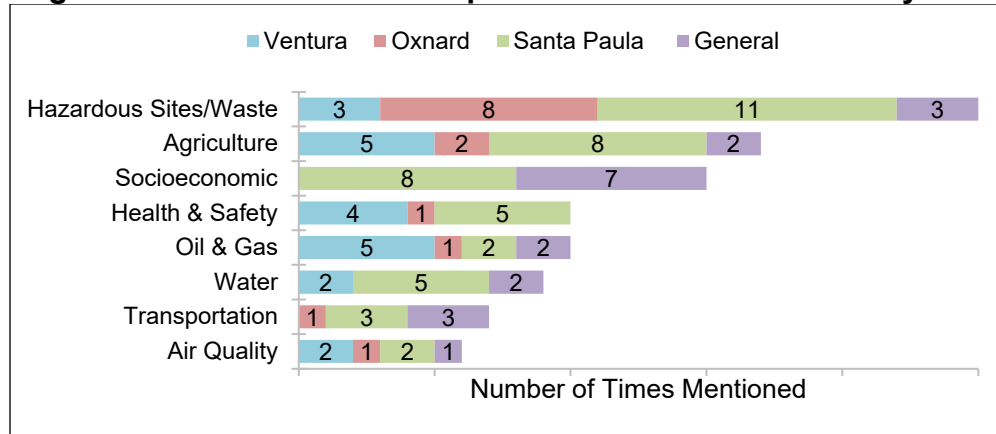
Ninety-three (93) distinct comments were received through the public engagement process, which are summarized in Exhibit 8. Overall, most of the public comments describe environmental pollution burdens experienced by local communities. Staff identified recurring topics and provided overall responses to each topic, which are described in further detail in Chapter 5 of the Study. Individual responses to specific comments are provided in Exhibit 8. The number of times a topic was mentioned in a comment is summarized in Figure 6 below.

Figure 6. Topics Mentioned in Comments Received



*Note: The “Other” category includes topics that were mentioned such as 5G towers, sea level rise, flooding, development projects within cities, airports, noise, gangs and drugs, gentrification, and property values. Individual responses to these comments are provided in Exhibit 8.

Figure 7 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” classification in Figure 7 encompasses comments that are not explicitly focused on a specific Study Area and are considered to be applicable to all areas evaluated in the Study.

Figure 7. CalEnviroScreen Topics Mentioned in Each Study Area

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. All topics are summarized along with staff's responses in Chapter 5 of the Study.

6. Identify DDCs Using Option 3

In consideration of the public input received, staff 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 7.c and Exhibit 3, 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. Thus, staff requests that your Commission make a recommendation to the Board to identify additional DDCs based upon the boundaries established by Option 3 (see Exhibit 6).

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, staff research conducted on disadvantaged community identification practices used in other jurisdictions statewide, local county information, and site visits conducted by staff. Option 3 encompasses the following land uses and developments with the identified potential disadvantaged communities:

- 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.

Notably, Option 3 does not include large, sparsely populated areas of open space and agricultural lands. This is partially due to the results of staff's research on several other counties and cities that have adopted or are in the process of updating their General Plans and how those jurisdictions identified disadvantaged communities during their General Plan update process. Table 6 below summarizes staff's research of each jurisdiction. 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' assessment 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 6. 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
<p>¹Disadvantaged 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.</p> <p>²Other information may include low-income thresholds, local input and local-level technical data, or SB 244.</p> <p>³The City of Oxnard identified disadvantaged communities within the context of its 2021-2029 Housing Element. See Figure 5 above for more details.</p>			

Given the above considerations, Option 3 is preferred because it not only includes key areas identified in both Options 1 and 2, but also includes key areas in the Oxnard Study Area that are not otherwise included in the first two options (see Exhibit 7). Staff is thus requesting that your Commission consider the information provided in this staff report, the Study, and the public input received, and recommend that the Board: (1) select Option 3 to define the boundaries for the designation of additional disadvantaged communities in the General Plan and (2) direct staff to process a GPA to update the maps and list of low-income and disadvantaged communities in the General Plan and the General Plan's Background Report to include the DDCs identified by Option 3.

It is important to note that Option 3 deviates from the previous methodology used to identify the DDCs in the General Plan for the Saticoy, El Rio/Del Norte, and Piru areas. Should your Commission recommend that the Board identify DDCs using Option 3, your Commission may also consider whether to recommend that the Board direct staff to re-evaluate the adopted DDCs for El Rio/Del Norte, and Piru areas using the methodology applied in Option 3 and present the results to your Commission at a future hearing for consideration.⁶ Alternatively, 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.

B. NEXT STEPS

Staff requests that your Commission make a recommendation to the Board to select Option 3 to define the boundaries for the designation of additional disadvantaged communities in the General Plan. Should your Commission wish to modify the boundaries defined under Option 3, your Commission may direct staff to modify the recommendation

⁶ Saticoy is classified by the State of California as a "severely economically disadvantaged 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's Background Report](#) for more details). Given Saticoy's unique community character, compact land uses, and status under Health and Safety Code Sec. 116760.2, staff does not recommend any changes to the adopted DDC boundary for Saticoy.

to the Board accordingly. Following today's public hearing, staff will present your Commission's recommendations to the Board in conjunction with the Study, related exhibits and materials, as well as all public comments received. A hearing before the Board is anticipated in December 2023. A GPA will be required to implement any disadvantaged community designation(s) as recommended by the Board. Such amendment would include updating the maps and list of low income and disadvantaged communities in the General Plan, as well as the General Plan's Background Report to reflect such designation(s).

C. PLANNING COMMISSION HEARING NOTICE AND PUBLIC OUTREACH

The Planning Division provided a public notice regarding the Planning Commission hearing in accordance with Government Code section 65090. The Planning Division placed a legal advertisement providing notice of this public hearing in the *Ventura County Star* on September 22, 2023 and in Spanish in *Vida* on September 21, 2023. A bilingual notice was provided through email to those who requested special notice during the public engagement process as part of the project, as well as a group of Community Connectors who were contacted during the public engagement process. A bilingual press release was also posted on the County's news webpage as well as distributed to local media outlets.

D. RECOMMENDED ACTIONS

Based upon the analysis and information provided above, Planning Division staff recommends that the Planning Commission take the following actions:

1. **CERTIFY** that the Planning Commission has reviewed the staff report and all exhibits hereto, and has considered all other materials and public comments received during the public comment and hearing;
2. **CERTIFY** that the Planning Commission has considered the research findings and designation options set forth in the Study of Additional Potential Disadvantaged Community Designations (the Study) and this staff report;
3. **RECOMMEND** that the Board of Supervisors select Option 3 to define the boundaries for the designation of additional disadvantaged communities in the General Plan; and
4. **RECOMMEND** that the Board of Supervisors direct Planning staff to process a General Plan amendment to update the maps and list of low income and disadvantaged communities in the General Plan and the General Plan's Background Report to include the DDCs identified by Option 3.

This staff report was reviewed by County Counsel. If you have any questions concerning the information above, please contact Jessica Nguyen, Project Manager, at (805) 654-5037 or by email at JessicaT.Nguyen@ventura.org. You may also contact Shelley Sussman, General Plan Implementation Section Manager at (805) 654-2493 or at Shelley.Sussman@ventura.org.



Dave Ward, Director
Ventura County Planning Division

EXHIBITS

- Exhibit 1 – Study of Additional Potential Disadvantaged Community Designations
- Exhibit 2 – General Plan Figure 2-6 – Designated Disadvantaged Communities
- Exhibit 3 – General Plan Goals, Policies, and Programs Specifically Focused on DDCs
- Exhibit 4 – Potential DDCs Based on Option 1
- Exhibit 5 – Potential DDCs Based on Option 2
- Exhibit 6 – Potential DDCs Based on Option 3
- Exhibit 7 – Comparison of Areas Included in Options
- Exhibit 8 – Public Comments Received During Public Engagement
- Exhibit 9 -- Public Comments Received for Planning Commission Hearing for Oct. 5, 2023