



**Ventura County  
Air Pollution  
Control District**

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April 27, 2018

Laura Zaremba-Schmidt  
California Air Resources Board  
9480 Telstar Avenue #4  
El Monte, California 91731

**SUBJECT: INITIAL AB 617 COMMUNITY RECOMENDATIONS AND ASSESSMENT  
METHODOLOGY TO DEVELOP AN INITIAL LIST OF CANDIDATE  
COMMUNITIES IN VENTURA COUNTY**

Ms. Zaremba-Schmidt:

On March 8, 2018 (VCAPCD) staff met with our most active local social/environmental justice organization the Central Coast Alliance United for a Sustainable Economy (CAUSE). CAUSE has recently been actively opposing a proposed gas turbine power plant in Oxnard based on environmental justice issues. In addition, on April 9, 2018 VCAPCD staff participated in a local Community Environmental Justice workshop sponsored by CAUSE and the California Environmental Justice Alliance. On April 19, 2018, the VCAPCD conducted our initial public workshop on the implementation of AB 617, Community Air Protection Program.

To identify an initial list of recommended communities, VCAPCD staff has focused on:

- CalEnviroScreen 3.0
- U.S. EPA's EJSCREEN mapping tool
- VCAPCD information on permitted facilities in and nearby disadvantaged/burdened communities identified via CalEnviroScreen 3.0 or EJSCREEN
- Community/public input

VCAPCD staff's initial areas of focus in using CalEnviroScreen 3.0 were air emission related information (ozone, PM 2.5, diesel particulate), pesticide application information, and health factors (asthma, low birth weight and cardiovascular disease). CalEnviroScreen 3.0 data for several census tracts in the Oxnard area is attached. The pesticide application rates, asthma scores and cardiovascular disease are elevated in these census tracts. Staff believes these elevated scores need to be studied further prior to making a final recommendation on inclusion in the Community Air Protection Program. With regard to the asthma scores, staff has contacted the local Medi-Cal provider for Ventura County, Gold Coast Health Plan, and requested information on the utilization of medical services related to asthma by enrollees in the Oxnard area as compared to enrollees in other areas of Ventura County. Gold Coast Health Plan staff was receptive to our request for information, but noted a response would take some time.

VCAPCD staff's review of the U.S. Environmental Protection Agency's (EPA) EJSCREEN mapping tool has determined that this tool will need to be evaluated in more detail prior to utilizing the information. The EJSCREEN Environmental Justice index data is concerning as Oxnard has an ozone EJ index of 94<sup>th</sup> percentile (state) and Simi Valley has an ozone EJ index of 21<sup>st</sup> percentile (state). Currently, Oxnard has an ozone design value of 61 ppb (8-hour average) and Simi Valley has a design value of 77 ppb (8-hour average). However, staff's initial review shows that the EJSCREEN environmental and demographic indicators seem reasonable. EJSCREEN reports for Oxnard and Simi Valley are attached.

VCAPCD staff has also reviewed our air toxics information from our AB 2588 "Hot Spots" program. Staff focused on core (non-industrywide) facilities located in the initial list of recommended communities. The current AB 2588 information does not identify any core sources with a cancer risk of over 10 in a million, or acute or chronic indices of greater than 1.0. Staff is currently in the process of hiring a replacement for our toxics engineer. As soon as this new hire is on-board we will begin the AB 2588 work of prioritizing facilities using our updated prioritization procedures and focusing on core facilities located in the initial list of recommended areas. On November 8, 2016, VCAPCD adopted updated prioritization guidelines to implement the Cal-EPA Office of Environmental Health Hazard Assessment's updated Health Risk Assessment Guidelines for use by California air districts.

In addition, VCAPCD staff reviewed the results of the University of Southern California's Environmental Justice Screening Method (EJSM); however, the results were not as relevant to Ventura County as to other Southern California counties. However, EJSM displayed similarity with CalEnviroScreen 3.0 results.

The initial list of recommended communities will include the following census tracts (maps attached):

- 6111002905 Oxnard (North West area)
- 6111003201 Oxnard (North area)
- 6111009100 Oxnard (Colonia area)
- 6111004902 Oxnard (North East area)
- 6111004704 Oxnard (South East area)
- 6111004715 Oxnard (South area)
- 6111004400 Port Hueneme
- 6111002400 Ventura (Downtown area)
- 6111002300 Ventura (Avenue area near Hwy 33)
- 6111002200 Ventura (Avenue area East)
- 6111006100 Newbury Park
- 6111000400 Santa Paula (North East area)\*
- 6111000500 Santa Paula (South of Hwy 126)\*

- 6111000302 Fillmore area\*
- 6111000200 Piru area\*
- 6111005002 El Rio area\*

\* Areas are included based on community/public input received at the April 9, 2018 local Community Environmental Justice workshop sponsored by CAUSE and the California Environmental Justice Alliance. These areas were included in CalEnviroScreen 2.0 as potential disadvantaged/burdened communities.

This initial list will be refined and prioritized by VCAPCD staff. It is the intention of VCAPCD staff to submit a prioritized list to the California Air Resources Board, by July 31, 2018. At that time boundaries may be delineated using areas not based on census tracts. For example, the Oxnard census tracts could be consolidated into a larger area, if appropriate.

To refine and prioritize the initial list of candidate communities VCAPCD will consider:

- CalEnviroScreen 3.0
- U.S. EPA's EJSCREEN mapping tool
- VCAPCD information on permitted facilities in and nearby potential communities
- VCAPCD emission inventory information contained in our databases for both criteria and toxics pollutants from stationary sources in and nearby potential communities
- CARB emission inventory for criteria pollutants from mobile sources (as available)
- Monitoring data from the California Department of Pesticide site at Rio Mesa High School in Ventura County (El Rio area, just north of Oxnard)
- Potential input from health care entities
- Community input

As stated above, with regard to the asthma scores staff has contacted the local Medi-Cal provider for Ventura County, Gold Coast Health Plan, and requested information on the utilization of medical services by enrollees in the Oxnard area as compared to enrollees in other areas of Ventura County. Staff will also be seeking input from the County Public Health Department on this issue.

Staff will be meeting with the Oxnard Inter-Neighborhood Council Organization's Executive Committee on May 9, 2018 to seek additional public input and schedule additional community meetings. Staff will also be working with local community groups, environmental groups, and environmental justice groups, such as CAUSE, for assistance in obtaining additional community input.

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Please contact me at 805/645-1440 or [mike@vcapcd.org](mailto:mike@vcapcd.org) if you have any questions regarding this matter.

Sincerely,



Michael Villegas

Air Pollution Control Officer

Attachments:

1. CalEnviroScreen 3.0 data for several Oxnard census tracts
2. CalEnviroScreen 3.0 map of Oxnard area
3. CalEnviroScreen 3.0 map of Ventura Avenue area
4. CalEnviroScreen 3.0 map of Newbury Park area
5. EJSCREEN Report – central Oxnard
6. EJSCREEN Report – central Simi Valley