

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 2:19 PM
To: Simmons, Carrie
Subject: FW: General Plan/EIR
Attachments: page3image3766736.png; page4image1774048.jpeg; page1image1665632.png; page3image3766944.png; page3image3744272.png; page3image3743440.png; page2image1668752.png

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Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
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Ventura County General Plan Update. Join the conversation at VC2040.org
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Pursuant to the California Public Records Act, email messages retained by the County may constitute public records subject to disclosure.

From: Meghan McMonigle <meghancmmonigle@gmail.com>
Sent: Thursday, February 27, 2020 2:18 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Cc: Bev Denicola <de.nicola@cox.net>
Subject: General Plan/EIR

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Sanger Hedrick, Chair
Agricultural Policy Advisory Committee (APAC) County of Ventura
800 S. Victoria Blvd.
Ventura, CA 93003

Re: 2040 General Plan Environmental Impact Report (EIR)

Dear Mr. Hedrick and Honorable Members of APAC:

Thank you for the opportunity to provide comments following today's presentation by Ventura County Planning staff on the 2040 General Plan EIR.

There are several issues with the 2040 General Plan EIR that CoLAB believes will negatively impact the viability of local agriculture.

Proposed mitigation measure AG-2: The County proposes that any project that either directly or indirectly results in the loss of farmland must obtain and place into perpetual agricultural preservation twice the total of the farmland loss. This mitigation measure is infeasible. Contrary to statements made by County Planning staff today at the APAC meeting, the California Environmental Quality Act (CEQA) requires that all mitigation proposed in an EIR be feasible. CEQA Section 21061.1 defines feasible as “capable of being accomplished in a successful manner within a reasonable period of time,

” (*emphasis added*). All mitigation measures proposed in an EIR must be shown to reduce impacts

and an infeasible mitigation measure, by definition, cannot and will not reduce impacts.

The EIR does not provide evidence of any of the following:

1. 1) Whether there is sufficient land available for purchase/conservation easement for each farmland category;
2. 2) The cost per acre to purchase each category of farmland;
3. 3) The anticipated cost of establishing a conservation easement for each category of farmland;
4. 4) The anticipated cost associated with managing each category of farmland under a conservation easement;
5. 5) The anticipated cost associated with monitoring these mitigation parcels scattered throughout the County and who will bear that cost;
6. 6) Any information that could constitute a “plan” for management of farmland in conservation easements;

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7. 7) An analysis of direct and indirect impacts caused by this mitigation measure (including impacts associated with LU compatibility conflicts and increased urban-ag-interface);
8. 8) Whether the smallest possible mitigation acreage required will achieve the minimum to ensure viability of agriculture on the parcel; and
9. 9) Whether the proposed mitigation is in conflict with other ordinances and regulations, such as the County's Zoning Ordinance and the County's minimum lot sizes.

The County is already aware that this proposed mitigation measure is infeasible. On March 24, 2016, at a Local Agency Formation Commission (LAFCo) hearing, Supervisor Linda Parks attempted to establish an "Agricultural Mitigation Measure" through the LAFCo project approval process. The mitigation measure would have required the 1-to-1 purchase of local farmland (half of what is proposed in the 2040 General Plan EIR) to replace farmland that would be impacted by any proposed development. Ventura County Counsel, Michael Walker, informed both LAFCo and Supervisor Parks that the proposed mitigation measure did not meet the standard for economic feasibility, and, for that and other reasons, LAFCo could not adopt Supervisor Park's proposed mitigation measure. He referenced a 2015 legal decision, *City of Irvine v. County of Orange*, in which the Court stated, "the sheer astronomical expense of land supports the finding of the EIR that the purchase of an agricultural conservation easement is a non-starter."

In addition to being infeasible, CoLAB does not believe that this mitigation measure will reduce impacts on agricultural land, as it does not address the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

Indirect Impacts

The EIR dismisses "indirect impacts" that will occur as a result of implementing the 2040 General Plan as "less than significant."

Page 4.2-13 of the EIR states "AG-2.3 maintains the Right-to-Farm Ordinance to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas...These sections of the code protect farmers engaged in agricultural activity from public nuisance claims...This protects the farming community, including Important Farmlands and farms less than 10 acres, from developments that would inhibit their ability to continue agricultural production."

Page 4.2-17 of the EIR states: "Residential growth in areas nearby agricultural lands has the potential to result in land use conflicts. Residential land uses are generally more sensitive and prone to conflict with adjacent agricultural land uses than commercial or industrial land uses. The placement of sensitive land uses, such as residences and schools, nearby classified farmland can negatively impact both uses due to conflict including odor nuisances and noise from agriculture machinery. The countywide Right-to-Farm Ordinance protects existing agricultural and farming operations from conflicts attributed to residential development...Therefore, the potential for conflicts would be minimal. This impact would be less than significant" (*emphasis added*).

This is simply not true. Historic and recent County actions have shown that the County has and will continue to create new restrictions and ordinances that have a significant impact on existing agricultural



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urgency ordinance restricting hemp cultivation is one such example.

Contrary to statements made today by Ventura County Planning staff, an EIR, whether it is labeled as “programmatic” or “project”, must analyze all reasonably foreseeable consequences of the action that is proposed. For the 2040 General Plan EIR, the action proposed is the implementation of all policies and programs within. Therefore, if the implementation of a policy in the 2040 General Plan will result in an impact, that impact must be analyzed. For example, the 2040 General Plan contains land use designation changes that will increase allowable housing density near agricultural land. It is reasonably foreseeable that more houses will create more compatibility conflicts with normal farming operations. The impact of these compatibility conflicts must be addressed in the EIR.

In 2014, the California Court of Appeal stated in a ruling that “[T]he fact that this EIR is labeled a ‘project’ rather than a ‘program’ EIR matters little....Designating an EIR as a program EIR ... does not by itself decrease the level of analysis otherwise required in the EIR. All EIRs must cover the same general content. The level of specificity of an EIR is determined by the nature of the project and the “rule of reason,” rather than any semantic label accorded to the EIR.”

It is CoLAB’s opinion that indirect impacts from increasing urban-ag interface are SIGNIFICANT and cannot be dismissed in the EIR.

Direct and indirect impacts of increased costs

The 2040 General Plan has policies that will increase the costs of normal farming operations. CoLAB believes that the most effective way to minimize conversion of agricultural land to non-agricultural uses is to take active measures to allow farming to remain profitable. And even the County admits that reducing the cost of farming reduces conversion of agricultural land in their discussion of the Williamson Act in Chapter 4.2 of the EIR.

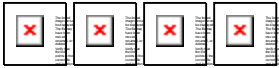
But the County fails to analyze direct and indirect impacts of 2040 General Plan policies that will increase the cost of normal farming operations, such as:

- Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment. The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment when feasible.

- Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps. The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilities to eliminate or reduce standby charges.

Direct and indirect impacts of increased competition for water resources
 The County fails to evaluate the impact of increased competition for water resources caused by development allowed in the 2040 General Plan on either the conversion of agricultural land or the loss of agricultural lands through the loss of topsoil.

The EIR states on page 4.2-3 that "...a reduction in available water resources for irrigation" is an example of indirect impacts on agricultural land due to loss of topsoil from increased wind and water erosion.
 But the County fails to analyze or propose mitigation measures to address this significant impact.



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CoLAB encourages APAC to provide guidance to the County on appropriate and effective mitigation measures to prevent the conversion of agricultural land to non-agricultural uses. These may include:

- 1) Strengthen the Right-to-Farm ordinance to prevent nuisance complaints from being used to justify the creation or expansion of setbacks or regulatory restrictions on normal farming practices;
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- 3) Protect agricultural land from urban-ag interface encroachment and compatibility conflicts by establishing setbacks on NON-AE-zoned land that will restrict the construction of bike paths, public trails, and sensitive receptors within 2000' of any land zoned A/E.

Thank you again for the opportunity to provide comments on this issue. We appreciate your consideration and leadership at this time.

Sincerely,

Louise Lampara Executive Director



In support of this letter-
Meghan Chambers McMonigle

--

Meghan McMonigle

KTLA 5 Technology Segment Producer

5800 Sunset Blvd. Los Angeles, CA 90028 | *Office: 323-460-5520 | Cell: 323-371-4042*



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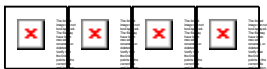
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Sincerely,

Louise Lampara Executive Director



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Subject: General Plan / EIR Comments

To: Susan Curtis-

County failed to evaluate mitigation measures for feasibility- 500' set back for "sensitive receptors" from freeways and high traffic roads.

Mitigation Measure AQ-3 (Policy HAZ10-X) creates a minimum 500' set back for "sensitive receptors" from freeways and high traffic roads. Yet the County states in the Land Use section of the EIR that "the majority of the anticipated build-out will be within the freeway corridors."

Has the County completed a "buildout study" to ensure that the establishment of this set back still leaves enough room for development to occur? Will this mitigation measure be economically feasible?

Mary Katherine Chambers McMonigle

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 7:54 AM
To: Simmons, Carrie
Subject: FW: Comment Draft EIR Ag - JDietrick & RWhitehurst
Attachments: VC2040 Comment EIR-Ag JDietrick & RWhitehurst.pdf

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From: Jan Dietrick <jdietrick9@gmail.com>
Sent: Thursday, February 27, 2020 12:51 AM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Cc: ClerkoftheBoard, ClerkoftheBoard <ClerkoftheBoard@ventura.org>
Subject: Comment Draft EIR Ag - JDietrick & RWhitehurst

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February 27, 2020

Dear Susan Curtis,

Our comments are about the Draft Environmental Impact Analysis of the Agriculture Element of the VC2040 General Plan. We have serious concerns about other chapters, especially Water Resources, but time does not permit us to develop comments.

Before commenting on the topics of food security, resilience, carbon sequestration, regenerative agriculture, inorganic nitrogen based fertilizer, compost, cover crops and low- and no-till, agricultural land conservation and preservation, and Integrated Pest Management, we preface by saying that everything in the General Plan must be seen through the lens of the global climate and ecological crisis and the need for leadership so that the people of Ventura County are confident that the community response meets some minimum standard of social and environmental justice. Climate

change necessitates an examination of personal values and a shift of mindset about agriculture policy at the local level.

The VC2040 Environmental Impact Report reflects a great deal of this needed shift, but we see omissions in the coverage of existing conditions in the Background Report and in the scope and/or targeting of the goals, policy and programs. There are five programs added to the EIR that are not in the Draft Plan, so we refer to the EIR except where we have comments about the Goal statements in the Plan. The recommendation we hope you take most seriously is to create a separate Goal for Integrated Pest Management.

Planning that matches the climate crisis is vital. This is not clear enough in the Background Report. The most recent report of the Intergovernmental Panel on Climate Change (IPCC) states that the climate problem points *first* to what we do on the land. The USDA Economic Research Service reported on the impacts on prices of food, fiber and energy, and agricultural incomes, as well as the environment. “How farmers respond, or adapt—possibly mediated by policy and technology changes—will ultimately determine the impact of these altered growing conditions on production, natural resources, and food security” Report No ERR-266 “Climate Change and Agricultural Risk Management Into the 21st Century” projects an increase in the cost of the Federal Crop Insurance Program due to greater insured value and yield variability resulting from climate change.

FOOD SECURITY

Lack of secure food system nationally affects local already extreme insecurity. The Union of Concerned Scientists reported in March 2019 that the already highly degraded industrial model of US agriculture—“a model that neglects soil, reduces diversity, and relies too heavily on fertilizers and pesticides”—makes US farms even more vulnerable to the impacts of climate change. Ventura County depends on the rest of the nation and other countries for 85% of its food supply. Our reliance on international markets and international trade leaves our local economy vulnerable to disruptions such as we must anticipate with the Covid-19 coronavirus.

We need to accelerate localizing our food supply as the focus for food security. It would help to delete the false narrative in Goal 8.4 that local farmers are feeding the local people. If there is no food coming or going, farms are not going to be a resource, which is ridiculous in a county that can grow such a diversity of crops throughout the year.

Goal AG-4.1 needs to include all agricultural products, not just fresh produce, and real incentives and marketing campaigns will be necessary including benchmarks for increased purchase of local products by institutions. Program B to encourage sales and Program C to identify opportunities to provide local food to county agencies are good, but they will need to be stronger. A more aggressive set of programs will be necessary to promote markets for local agricultural products to achieve the food security goal.

It is unacceptable to only “identify opportunities...to the extent feasible” to increase county procurement of local products. Feasibility is a matter of where the County decides to invest. Food security is such a priority goal that the county must invest increasingly year by year in local farmers to stimulate a market signal toward localizing our food supply.

Program F in the EIR is excellent to study and remove barriers to farm stands. The program must specifically aim to help Ventura County farmers sell their products in the county and be able to compete with farm stand operators selling products from the San Joaquin Valley, Mexico and elsewhere. Program G to study the “Farm to Front Door” business model ignores many other possible business models to connect producers and consumers and should be rewritten to be more general.

RESILIENCE

Resilience starts with farmers being informed about the climate modeling and adopting practices that increase biodiversity and enrich soil to hold carbon and water. Ventura County hired scientists to run climate models that show the changes in patterns of rainfall, drought, and extreme weather events and how that is connected to wildfires. The modeling is not found with enough detail in the VC2040 Background Report to help farmers and their advisers and representatives understand what’s ahead and why a shift in mindset about goals and effective policies and programs are needed that mitigate the climate impacts.

The Agricultural Resilience goal has one policy AG-6. 2. The plan implies that resilience can be achieved only by crop selection. Neither the goal nor the policy covers the necessity to build soil and water-holding capacity and penetration, increase biodiversity and improve the watershed to hold storm water onsite. Program O in the EIR (Program N in the Draft Policy) refers to reduced tillage but the entire policy and program should be rewritten to assure development of the full scope of important resilience strategies.

INCREASING SOIL CARBON

Carbon sequestration is a moral imperative as well as the centerpiece of resilience. The draft policy to encourage and support carbon farming is not explicit enough about the contribution farmers can make by focused effort to increase soil carbon for climate mitigation.

The California Air Resources Board is working with agencies at local levels to develop measures as outlined in Scoping Plan update and governor's Executive Order B-30-15 to reduce GHG emissions toward net carbon sequestration by California's agricultural sector. The governor's 2030 targets for GHG emission reductions focus on the role played by farmland and soil in the carbon cycle. Research is being done regarding how much GHG is being emitted and how much can be sequestered by California's agricultural lands. The words “when feasible” should be deleted from Policy AG-5. 5 and Program L and replaced by a policy and program to develop meaningful incentives.

A serious flaw in the state Healthy Soils Program is the refusal to allow applications by farmers that have previously done practices on their farm to increase soil carbon. Farmers learn most from other farmers. Our early adopters should be supported to continue to do on-farm experimentation with multi-pronged and innovative practices that to increase their soil carbon and other benefits. The County should create a program complementary to the state program to support exemplary farmers to expand local experiences with carbon sequestration even though they are disqualified (because they are innovators) from the state Greenhouse Gas Reduction Fund programs.

REGENERATIVE AGRICULTURE

Regenerative practices are essential for farmland preservation as well as resilience and food security, whether or not you use that term. The Planning Commission and the Board approved the addition of the word regenerative to the AG-5 goal ‘Sustainable Farming and Ranching’. The term does not appear in the draft. Goals inherent in the word regenerative are not covered in the draft policy or programs—**to increase biodiversity and enrich soils to hold more carbon.** Increasing soil carbon and above-ground biomass may be implied by use of the term ‘Carbon Farming’ but these outcomes should be explicit.

In contrast with regenerative practices, what people understand about sustainable practices does not necessarily include increasing soil carbon and above-ground biomass. The USDA definition of sustainable agriculture: “Make the most efficient use of nonrenewable resources and on-farm resources and integrate, where appropriate, natural biological cycles and controls. Sustain the economic viability of farm operations. Enhance the quality of life for farmers and society as a whole.” Organic farming used to require soil as the growing medium, but not any longer. Using the term “truly sustainable” as in the draft goal still does not assure the features of regenerative agriculture encompassing a robust response to climate change by mitigating greenhouse gas emissions. Prohibiting the use of the word regenerative results in a loss of meaningful guidance for facing today’s challenges. It can be made up for in Goal 5 by at least assuring in the policies and programs its key features of increasing biodiversity, enriching soils in ways that progressively increase soil carbon, increasing above-ground biomass, and improving watersheds.

Biodiversity here refers to everything from soil microbes to plant roots in the soil to above-ground cropping to include 1 to 5% planted for beneficial insect habitat, to include as many native plants as possible. Other practices to increase biodiversity are crop rotation, perennial mowed cover crop in orchards, agroforestry, silvopasture, and interplanting multiple species or varieties of crops. Not only does biodiversity enhance biological function, especially that of carbon sequestration and nutrient cycling, and improve resistance to all risks from diseases to floods, it also improves economic stability by spreading economic risk and buffering against pest invasions and extreme weather events.

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Inorganic nitrogen contributes to greenhouse gas emissions and is often unnecessary when regenerative practices are used. The energy used to manufacture and transport artificial N and phosphate fertilizers are major contributors to climate change. Research in pasture and cover crops show fertility is achievable with no nitrogen inputs, artificial or biological. The greater the biodiversity the greater the carbon sequestration, nitrogen fixation, and other nutrient cycling. There is misinformation being shared by trusted experts about the potential to increase soil carbon on Ventura County farms. Research shows that all nutrients, including phosphorus, calcium, and sulfur, as well as nitrogen, are available in soils and can be mobilized by growing the microbial diversity via the “liquid carbon pathway” fed by photosynthesis by a diversity of growing plants. Research and demonstration of this kind should be carried out, particularly in our orchards, vineyards, and other perennial crops.

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Agricultural land protection and preservation depends on development of regenerative farming practices. Some “right-to-farm” issues are often moot when regenerative practices are employed. There may still be noise and odor impacts, but pesticides and dust need not be issues. Food safety issues can be managed. Practices that will best assure financially successful farms are not necessarily incompatible with urban areas or existing communities. It may be an economic advantage to develop compatibility with other land uses because, in the end, landowners have more good financial options when they care for their land using compatible regenerative practices. Otherwise, there is little chance that farmland could be dedicated to agricultural conservation easements. Farmland can only be worth conserving if the land manager increases the biodiversity, enriches the soil to hold carbon and improves the watershed. Furthermore, the most financially stable and potentially profitable farms will increasingly be connected to local markets and be patronized by a community that values their use of organic and/or regenerative practices.

As the most certain way to preserve agricultural land, the General Plan should create baselines and goals and targets for carbon sequestration that is an indicator of the value of farmland, with its co-benefits of preventing pest and disease, erosion and nutrient and water loss prevention, and increasing resilience to drought, flooding and resilience to temperature extremes. If the “right-to-farm” implies that Prime and Important Farmland soil is laid bare, compacted and/or regularly tilled, and exposed to toxic inputs including herbicides, synthetic fertilizer causing it to be devoid of life and subject to erosion and crop failure under extreme weather conditions, then there is no land preservation policy able to save it from being abandoned or sold for development.

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use of pesticides. The best alternatives to pesticides require attention to soil building and crop plans that forecast insect movement in the farmscape, in other words systems thinking rather than the common replacement of an organic pesticide for higher risk pesticide.

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Policy and programs are needed that lead the entire community of regulators, consultants, farmers and consumers along the Roadmap for Integrated Pest Management in the shift of mindset about pest management described on page 11 that flips the risks and incentives to favor the most effective alternatives that keep pests and disease below economic thresholds.

While developing protocols for guidance, discussion, and documentation of the consideration of alternatives within the definition of IPM, at the very minimum there must be a framework for analyzing cumulative effects of more than one aerial or vapor-borne pesticide and the effects from pesticides used in a non-attainment area for other air pollutants. There is at least one scientifically documented case study in the county of the failure to consider cumulative effects and other cases where studies are urgently needed as a result of the calendar spraying for Asian citrus psyllid.

The policy and programs relating IPM to the general public should also look deeper to support the shift in mindset described in the Roadmap to IPM. It is just scraping the surface “to provide information on IPM and agriculture produces and practices” as stated in Policy AG 3.3. IPM policies should be placed under a separate new goal with policies aligned with the state Roadmap for Integrated Pest Management recommendations. See at https://www.cdpr.ca.gov/docs/pestmgt/ipm_roadmap.pdf

Excerpting ideas from pages 16 and 17 of the Roadmap, for example:

- a. **Hire an IPM coordinator and revive the county’s IPM Committee** with county public participation to promoting IPM practices
- b. **Drive demand for IPM in the value chain** by coordinating efforts with key organizations to link IPM and regenerative and sustainable agriculture initiatives with retail brands and raise awareness among commodities and allied groups such as packers and shippers, retailers, and trade partners

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- g. **Make practitioners more effective voices** for IPM by training frontline workers in agriculture, landscape and structural IPM
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Sincerely,

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Ron Whitehurst, Licensed Pest Control Advisor
Co-Owners of Rincon-Vitova Insectaries, Inc.
108 Orchard Dr
Ventura, CA 93001
805-746-5365

February 27, 2020

Dear Susan Curtis,

Our comments are about the Draft Environmental Impact Analysis of the Agriculture Element of the VC2040 General Plan. We have serious concerns about other chapters, especially Water Resources, but time does not permit us to develop comments.

Before commenting on the topics of food security, resilience, carbon sequestration, regenerative agriculture, inorganic nitrogen based fertilizer, compost, cover crops and low- and no-till, agricultural land conservation and preservation, and Integrated Pest Management, we preface by saying that everything in the General Plan must be seen through the lens of the global climate and ecological crisis and the need for leadership so that the people of Ventura County are confident that the community response meets some minimum standard of social and environmental justice. Climate change necessitates an examination of personal values and a shift of mindset about agriculture policy at the local level.

The VC2040 Environmental Impact Report reflects a great deal of this needed shift, but we see omissions in the coverage of existing conditions in the Background Report and in the scope and/or targeting of the goals, policy and programs. There are five programs added to the EIR that are not in the Draft Plan, so we refer to the EIR except where we have comments about the Goal statements in the Plan. The recommendation we hope you take most seriously is to create a separate Goal for Integrated Pest Management.

Planning that matches the climate crisis is vital. This is not clear enough in the Background Report. The most recent report of the Intergovernmental Panel on Climate Change (IPCC) states that the climate problem points *first* to what we do on the land. The USDA Economic Research Service reported on the impacts on prices of food, fiber and energy, and agricultural incomes, as well as the environment. “How farmers respond, or adapt—possibly mediated by policy and technology changes—will ultimately determine the impact of these altered growing conditions on production, natural resources, and food security” Report No ERR-266 “Climate Change and Agricultural Risk Management Into the 21st Century” projects an increase in the cost of the Federal Crop Insurance Program due to greater insured value and yield variability resulting from climate change.

FOOD SECURITY

Lack of secure food system nationally affects local already extreme insecurity.

The Union of Concerned Scientists reported in March 2019 that the already highly degraded industrial model of US agriculture—“a model that neglects soil, reduces

diversity, and relies too heavily on fertilizers and pesticides”—makes US farms even more vulnerable to the impacts of climate change. Ventura County depends on the rest of the nation and other countries for 85% of its food supply. Our reliance on international markets and international trade leaves our local economy vulnerable to disruptions such as we must anticipate with the Covid-19 coronavirus.

We need to accelerate localizing our food supply as the focus for food security. It would help to delete the false narrative in Goal 8.4 that local farmers are feeding the local people. If there is no food coming or going, farms are not going to be a resource, which is ridiculous in a county that can grow such a diversity of crops throughout the year.

Goal AG-4.1 needs to include all agricultural products, not just fresh produce, and real incentives and marketing campaigns will be necessary including benchmarks for increased purchase of local products by institutions. Program B to encourage sales and Program C to identify opportunities to provide local food to county agencies are good, but they will need to be stronger. A more aggressive set of programs will be necessary to promote markets for local agricultural products to achieve the food security goal.

It is unacceptable to only “identify opportunities...to the extent feasible” to increase county procurement of local products. Feasibility is a matter of where the County decides to invest. Food security is such a priority goal that the county must invest increasingly year by year in local farmers to stimulate a market signal toward localizing our food supply.

Program F in the EIR is excellent to study and remove barriers to farm stands. The program must specifically aim to help Ventura County farmers sell their products in the county and be able to compete with farm stand operators selling products from the San Joaquin Valley, Mexico and elsewhere. Program G to study the “Farm to Front Door” business model ignores many other possible business models to connect producers and consumers and should be rewritten to be more general.

RESILIENCE

Resilience starts with farmers being informed about the climate modeling and adopting practices that increase biodiversity and enrich soil to hold carbon and water. Ventura County hired scientists to run climate models that show the changes in patterns of rainfall, drought, and extreme weather events and how that is connected to wildfires. The modeling is not found with enough detail in the VC2040 Background Report to help farmers and their advisers and representatives understand what’s ahead and why a shift in mindset about goals and effective policies and programs are needed that mitigate the climate impacts.

The Agricultural Resilience goal has one policy AG-6. 2. The plan implies that resilience can be achieved only by crop selection. Neither the goal nor the policy covers the necessity to build soil and water-holding capacity and penetration, increase biodiversity and improve the watershed to hold storm water onsite. Program O in the EIR (Program N in the Draft Policy) refers to reduced tillage but the entire policy and program should be rewritten to assure development of the full scope of important resilience strategies.

INCREASING SOIL CARBON

Carbon sequestration is a moral imperative as well as the centerpiece of resilience. The draft policy to encourage and support carbon farming is not explicit enough about the contribution farmers can make by focused effort to increase soil carbon for climate mitigation.

The California Air Resources Board is working with agencies at local levels to develop measures as outlined in Scoping Plan update and governor's Executive Order B-30-15 to reduce GHG emissions toward net carbon sequestration by California's agricultural sector. The governor's 2030 targets for GHG emission reductions focus on the role played by farmland and soil in the carbon cycle. Research is being done regarding how much GHG is being emitted and how much can be sequestered by California's agricultural lands. The words "when feasible" should be deleted from Policy AG-5. 5 and Program L and replaced by a policy and program to develop meaningful incentives.

A serious flaw in the state Healthy Soils Program is the refusal to allow applications by farmers that have previously done practices on their farm to increase soil carbon. Farmers learn most from other farmers. Our early adopters should be supported to continue to do on-farm experimentation with multi-pronged and innovative practices that to increase their soil carbon and other benefits. The County should create a program complementary to the state program to support exemplary farmers to expand local experiences with carbon sequestration even though they are disqualified (because they are innovators) from the state Greenhouse Gas Reduction Fund programs.

REGENERATIVE AGRICULTURE

Regenerative practices are essential for farmland preservation as well as resilience and food security, whether or not you use that term. The Planning Commission and the Board approved the addition of the word regenerative to the AG-5 goal 'Sustainable Farming and Ranching'. The term does not appear in the draft. Goals inherent in the word regenerative are not covered in the draft policy or programs—**to increase biodiversity and enrich soils to hold more carbon.** Increasing soil carbon and above-ground biomass may be implied by use of the term 'Carbon Farming' but these outcomes should be explicit.

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Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 2:31 PM
To: Simmons, Carrie
Subject: FW: 2040 General Plan Draft EIR Comment

Follow Up Flag: Follow up
Flag Status: Flagged

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General Plan Update Section
susan.curtis@ventura.org

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Ventura County General Plan Update. Join the conversation at VC2040.org
For online permits and property information, visit VC Citizen Access



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From: Mary Vanoni <vanonimary@gmail.com>
Sent: Thursday, February 27, 2020 2:27 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: 2040 General Plan Draft EIR Comment

2040 General Plan Draft EIR Comment:

The County rushed to complete the EIR. It is too important to be done haphazardly and contain gross flaws that will impact our County so drastically.

Just a couple of the issues:

CEQA requires that proposed mitigation be both technically and economically feasible. The County's proposed mitigation measures are **infeasible**. One mitigation measure will require small development projects to purchase farmland to preserve in perpetuity. But the County didn't analyze the costs or indicate who would manage these small ag preservation parcels.

CEQA says that the mitigation cannot make the impacts worse. Shortage of farm worker housing was identified as one of the most significant issues facing agriculture in Ventura County. But mitigation proposed by the County will effectively block future farm worker housing, because these projects will bear the costs of land acquisition for preservation!

Please do what is right for Ventura County and take the time to correct and re-circulate the EIR.

Richard Atchley
Retired Carpenter, Farmer, Concerned Ventura County Resident

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 2:31 PM
To: Simmons, Carrie
Subject: FW: 2040 General Plan Draft EIR Comment

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
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Ventura County General Plan Update. Join the conversation at VC2040.org
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From: Marjie Bartels <bartelsranch@gmail.com>
Sent: Thursday, February 27, 2020 2:30 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: 2040 General Plan Draft EIR Comment

Dear Ms. Curtis: The EIR is based on incomplete analysis of policies, contains several false and ill-advised policies, and fails to understand key challenges related to Ventura County.

Some of the issues are:

1. CEQA requires that the EIR contain enough detailed information to allow the reader to understand and evaluate the County's impact analysis. But the EIR and its 1000-page Background Report are filled with errors, vague statements, and outdated information. All information in the Agricultural Chapter is older than 2015! The maps in the EIR and the Background Report are such poor resolution and detail that some are blurry and illegible.
2. CEQA requires that both direct and indirect impacts be analyzed. Yet the County failed to analyze indirect impacts (complaints, competition for water supplies, theft and vandalism, etc.) on agricultural land from increased development and more urban-ag interface, because the County assumes that the Right-to-Farm Ordinance will prevent any impacts on agriculture that may occur from urban-property owner complaints.
3. CEQA says that all policies that may cause impacts to ag lands must be evaluated. But the County failed to analyze or even discuss the policies in the General Plan that will increase farming operational costs (converting ag equipment to electric, requiring all electric water pumps, increasing costs for water supply, etc.).

Please do the correct thing for Ventura County and take the time to correct and recirculate the EIR!

Marjie Bartels, Certified Organic Valencia Orange Grower in Bardsdale

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 2:39 PM
To: Simmons, Carrie
Subject: FW: SCH # 2019011026 Ventura County 2040 General Plan Update
Attachments: LA-2017-00388 Ventura Conty 2040 General Plan Update-DEIR.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

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From: Lin, Alan S@DOT <alan.lin@dot.ca.gov>
Sent: Thursday, February 27, 2020 2:38 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>; Downing, Clay <clay.downing@ventura.org>
Cc: Duong, Frances M@DOT <Frances.Duong@dot.ca.gov>
Subject: FW: SCH # 2019011026 Ventura County 2040 General Plan Update

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

Dear Ms. Curtis and Mr. Downing,

Attached please find Caltrans comment letter for your record.

Please let us know if you have any question.

Thank you!

Alan Lin, P.E.
Project Coordinator
State of California
Department of Transportation

District 7, Office of Transportation Planning
Mail Station 16
100 South Main Street
Los Angeles, CA 90012
(213) 897-8391 Office
(213) 897-1337 Fax

From: Lin, Alan S@DOT
Sent: Thursday, February 27, 2020 2:36 PM
To: 'OPR State Clearinghouse' <State.Clearinghouse@opr.ca.gov>
Subject: SCH # 2019011026 Ventura County 2040 General Plan Update

Hard copy is sent to the Lead Agency!

Alan Lin, P.E.
Project Coordinator
State of California
Department of Transportation
District 7, Office of Transportation Planning
Mail Station 16
100 South Main Street
Los Angeles, CA 90012
(213) 897-8391 Office
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DEPARTMENT OF TRANSPORTATION

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www.dot.ca.gov



*Making Conservation
a California Way of Life.*

February 27, 2020

Ms. Susan Curtis
County of Ventura
800 S. Victoria Ave., L #1740
Ventura, CA 93009

RE: Ventura County 2040 General Plan Update
Vic. Countywide
SCH # 2019011026
Ref. GTS # VEM-2017-00228AL-NOP
GTS # VEN-2017-00388AL-DEIR

Dear Ms. Curtis:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is a comprehensive update of the County of Ventura General Plan, also known as the 2040 General Plan. The 2040 General Plan will set forth the County's vision of its future and identify the goals, policies, and implementation programs that will guide future decisions concerning a variety of issues, including but not limited to land use, climate change, agriculture, transportation, hazards, public facilities, health and safety, environmental justice, and resource conservation out to the year 2040.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. For future project, you may reference to The Governor's Office of Planning and Research (OPR) for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

The Lead Agency has provided a VMT analysis for this project and using 2012 Baseline Model, 2040 Ventura County General Plan Land Use Model, 2040 VCTC and 2040 SBCAG travel demand model. For further review and feedback, it would be helpful if the County can share all models and assumptions with Caltrans to validate the model results (including 2040 General Plan results on page 4.16-24) provided in section 4.16 Transportation and Traffic.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, in general Caltrans concurs the County's policies for future developments that

should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets and policies for bicycling, pedestrian, and public transit which can allow streets to transport more people in a fixed amount of right-of-way.

We encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths, and achieve a high level of non-motorized travel and transit use. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. Moreover, we encourage mixed-use development with smart growth principle to shorten travel distance for different land uses to achieve job-and-housing balance within the County boundary.

We have the following comments and recommendations for the following policies:

Policy CTM-1.7: Pro Rata Share of Improvements. We concur that “the County shall require discretionary development that would generate additional traffic to pay its pro rata share of the cost of added vehicle trips and the costs of necessary improvements to the Regional Road Network pursuant to the County’s Traffic Impact Mitigation Fee Ordinance.” Caltrans recommend the improvements shall include the State facilities identified and approved by both agencies.

Policy CTM-2.9: State Route 118 Improvement in Saticoy Area. When the final list of improvement is approved by Caltrans and Ventura County Transportation Commission (VCTC), we recommend this list be a part of the fair share program in the County’s Traffic Impact Mitigation Fee Ordinance.

Policy CTM-2.19: Safety Metrics. We concur that “the County shall continue to examine and update safety metrics for California Environmental Quality Act (CEQA) impact analysis as appropriate. Option include but are not limited to: queue spill-back at intersections; midblock unprotected crossings; and increased crossing distances.” Caltrans recommend the safety impact analysis shall also include off-ramps, State intersections, and weaving areas on the freeway mainlines. Caltrans will provide separate consultation for any queuing analysis when needed.

Policy CTM-4.1: Reduce Vehicle Miles Traveled (VMT). We concur that “the County shall work with Caltrans and Ventura County Transportation Commission (VCTC) to reduce VMT by...”. We recommend future projects to consider additional Traffic Demand Management (TDM) options referencing to the Federal Highway Administration’s *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

We recommend the County to develop a monitoring program to monitor the effectiveness of TDM or Vehicle Miles Traveled (VMT) Reduction Program.

We would like the County to invite Caltrans to review and to provide consultation/feedback when the County is developing or updating the following Implementation Programs in the future.

Implementation Program A: Traffic Impact Mitigation Fee Program.
Implementation Program B: Initial Study Assessment Guidelines.
Implementation Program C: Vehicle Miles Traveled (VMT) Reduction Program.
Implementation Program D: Regional Road Network Coordination.
Implementation Program L: Master Bicycle Network Plan.

For Land Use and Community Character Element, we concur “**Policy LU-11.3: Design.** The County shall require new commercial and industrial developments to be designed to be generally compact, grouped and consolidated into functional units providing for sufficient off-street parking and loading facilities, maximize pedestrian and vehicle safety, reduce vehicle miles traveled (VMT), encourage electric vehicle charging, and minimize land use conflicts and traffic congestion. The County shall require that commercial and industrial discretionary development is designed to provide adequate buffering (e.g., walls, landscaping, setbacks) and operational conditions (e.g., noise, glare, and odors) on adjoining and adjacent residential area.” Again, this is where we would encourage the County to promote mixed-use development with smart growth principle to shorten travel distance for different land uses to achieve job-and-housing balance within the County boundary.

Policy HAZ-10.8: Alternative Transportation Modes. We concur that “the County shall promote alternative modes of transportation that reduce single-occupancy vehicle (SOV) travel and enhance “last-mile” transportation option to improve air quality.” We recommend

Ms. Susan Curtis
February 27, 2020
Page 4

the County to develop a program to promote the alternative modes of transportation for new development projects.

For Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program, we concur that “During implementation of the 2040 General Plan, the County shall review and update the VMT Reduction Program as warranted to provide additional mitigations and Programs.” Again, we recommend the County to include Caltrans in the review and update process whenever is available.

For Mitigation Measure CTM-4: New Implementation Program CTM-X; Updated Traffic Impact Fee Mitigation Program, we concur that “the County shall require that development which adds traffic to roadways traversing within a County designated substandard roadway impact area contribute the fair share costs of any safety counter-measures that improve the safety of the impacted roadways by paying the applicable fees under the County’s Traffic Impact Fee mitigation program prior to issuance of Zoning Clearance.” Again, we recommend such safety improvements include the State facilities.

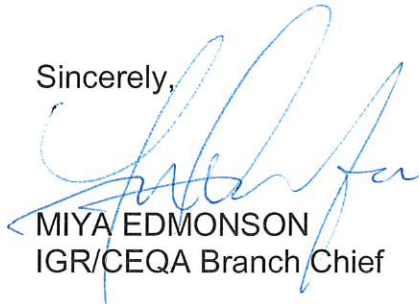
After this mitigation, we understand that “traffic volume would increase on existing roadways already identified as substandard facilities. Substandard roadways must be improved to meet County road standards to mitigate impact significance. Further, analysis of trips added by discretionary development to roadways identified as facilities with high collision/incidence rates must be explored at the project-level to ensure safety standards are met. No other feasible mitigation is available to eliminate safety concerns associated with the identified substandard roadways. Therefore, this impact would remain significant and unavoidable.”

On page 5-19 of the 2040 General Plan Draft Environmental Impact Report, we acknowledge that “the VMT impact analysis relies on existing and future growth accommodated through the 2040 General Plan and accounts for the projected growth of the incorporated cities and surrounding counties. Therefore, the transportation and traffic impacts identified in Section 4.16, are inherently cumulative. The VMT and County road standards and safety impacts would remain significant and unavoidable even with mitigation measures due to the increased development, new roadways, and increased numbers of users on the county’s transportation system that would result from implementation of the 2040 General Plan. Therefore, the potential for cumulative impacts related to transportation and traffic would be cumulatively significant, and the project would have a considerable contribution.” In the end, we recommend the County to work with Caltrans closely for each specific large project in the future to identify safety improvements on the State facilities and also in achieving to reduce VMT with land use balance principle.

Ms. Susan Curtis
February 27, 2020
Page 5

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # 07-VEN-2017-00388AL-DEIR.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 2:51 PM
To: Simmons, Carrie
Subject: FW: Comments on General Plan/EIR
Attachments: page4image1774048.jpeg; page1image1665632.png; page3image3766736.png; page3image3766944.png; page3image3743440.png; page2image1668752.png; page3image3744272.png

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Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

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From: Michael/Maggie McMonigle <mmmcmonigle@gmail.com>
Sent: Thursday, February 27, 2020 2:44 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Cc: Don and Bev de Nicola <de.nicola@cox.net>
Subject: Comments on General Plan/EIR

Sanger Hedrick, Chair
Agricultural Policy Advisory Committee (APAC) County of Ventura
800 S. Victoria Blvd.
Ventura, CA 93003

Re: 2040 General Plan Environmental Impact Report (EIR)

Dear Mr. Hedrick and Honorable Members of APAC:

Thank you for the opportunity to provide comments following today's presentation by Ventura County Planning staff on the 2040 General Plan EIR.

There are several issues with the 2040 General Plan EIR that CoLAB believes will negatively impact the viability of local agriculture.

Proposed mitigation measure AG-2: The County proposes that any project that either directly or indirectly results in the loss of farmland must obtain and place into perpetual agricultural preservation twice the total of the farmland loss. This mitigation measure is infeasible. Contrary to statements made by County Planning staff today at the APAC meeting, the California Environmental Quality Act (CEQA) requires that all mitigation proposed in an EIR be feasible. CEQA Section 21061.1 defines feasible as “capable of being accomplished in a successful manner within a reasonable period of time,

” (*emphasis added*). All mitigation measures proposed in an EIR must be shown to reduce impacts

and an infeasible mitigation measure, by definition, cannot and will not reduce impacts.

The EIR does not provide evidence of any of the following:

1. 1) Whether there is sufficient land available for purchase/conservation easement for each farmland category;
2. 2) The cost per acre to purchase each category of farmland;
3. 3) The anticipated cost of establishing a conservation easement for each category of farmland;
4. 4) The anticipated cost associated with managing each category of farmland under a conservation easement;
5. 5) The anticipated cost associated with monitoring these mitigation parcels scattered throughout the County and who will bear that cost;
6. 6) Any information that could constitute a “plan” for management of farmland in conservation easements;

February 19, 2020



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Page 2 of 4

7. 7) An analysis of direct and indirect impacts caused by this mitigation measure (including impacts associated with LU compatibility conflicts and increased urban-ag-interface);
8. 8) Whether the smallest possible mitigation acreage required will achieve the minimum to ensure viability of agriculture on the parcel; and

9. 9) Whether the proposed mitigation is in conflict with other ordinances and regulations, such as the County's Zoning Ordinance and the County's minimum lot sizes.

The County is already aware that this proposed mitigation measure is infeasible. On March 24, 2016, at a Local Agency Formation Commission (LAFCo) hearing, Supervisor Linda Parks attempted to establish an "Agricultural Mitigation Measure" through the LAFCo project approval process. The mitigation measure would have required the 1-to-1 purchase of local farmland (half of what is proposed in the 2040 General Plan EIR) to replace farmland that would be impacted by any proposed development. Ventura County Counsel, Michael Walker, informed both LAFCo and Supervisor Parks that the proposed mitigation measure did not meet the standard for economic feasibility, and, for that and other reasons, LAFCo could not adopt Supervisor Park's proposed mitigation measure. He referenced a 2015 legal decision, *City of Irvine v. County of Orange*, in which the Court stated, "the sheer astronomical expense of land supports the finding of the EIR that the purchase of an agricultural conservation easement is a non-starter."

In addition to being infeasible, CoLAB does not believe that this mitigation measure will reduce impacts on agricultural land, as it does not address the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

Indirect Impacts

The EIR dismisses "indirect impacts" that will occur as a result of implementing the 2040 General Plan as "less than significant."

Page 4.2-13 of the EIR states "AG-2.3 maintains the Right-to-Farm Ordinance to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas...These sections of the code protect farmers engaged in agricultural activity from public nuisance claims...This protects the farming community, including Important Farmlands and farms less than 10 acres, from developments that would inhibit their ability to continue agricultural production."

Page 4.2-17 of the EIR states: "Residential growth in areas nearby agricultural lands has the potential to result in land use conflicts. Residential land uses are generally more sensitive and prone to conflict with adjacent agricultural land uses than commercial or industrial land uses. The placement of sensitive land uses, such as residences and schools, nearby classified farmland can negatively impact both uses due to conflict including odor nuisances and noise from agriculture machinery. The countywide Right-to-Farm Ordinance protects existing agricultural and farming operations from conflicts attributed to residential development...**Therefore, the potential for conflicts would be minimal. This impact would be less than significant**" (*emphasis added*).

This is simply not true. Historic and recent County actions have shown that the County has and will continue to create new restrictions and ordinances that have a significant impact on existing agricultural



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Page 3 of 4

and farming operations because of conflicts attributed to residential development. The recent interim

urgency ordinance restricting hemp cultivation is one such example.

Contrary to statements made today by Ventura County Planning staff, an EIR, whether it is labeled as “programmatic” or “project”, must analyze all reasonably foreseeable consequences of the action that is proposed. For the 2040 General Plan EIR, the action proposed is the implementation of all policies and programs within. Therefore, if the implementation of a policy in the 2040 General Plan will result in an impact, that impact must be analyzed. For example, the 2040 General Plan contains land use designation changes that will increase allowable housing density near agricultural land. It is reasonably foreseeable that more houses will create more compatibility conflicts with normal farming operations. The impact of these compatibility conflicts must be addressed in the EIR.

In 2014, the California Court of Appeal stated in a ruling that “[T]he fact that this EIR is labeled a ‘project’ rather than a ‘program’ EIR matters little....Designating an EIR as a program EIR ... does not by itself decrease the level of analysis otherwise required in the EIR. All EIRs must cover the same general content. The level of specificity of an EIR is determined by the nature of the project and the “rule of reason,” rather than any semantic label accorded to the EIR.”

It is CoLAB’s opinion that indirect impacts from increasing urban-ag interface are SIGNIFICANT and cannot be dismissed in the EIR.

Direct and indirect impacts of increased costs

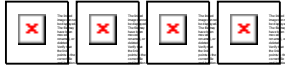
The 2040 General Plan has policies that will increase the costs of normal farming operations. CoLAB believes that the most effective way to minimize conversion of agricultural land to non-agricultural uses is to take active measures to allow farming to remain profitable. And even the County admits that reducing the cost of farming reduces conversion of agricultural land in their discussion of the Williamson Act in Chapter 4.2 of the EIR.

But the County fails to analyze direct and indirect impacts of 2040 General Plan policies that will increase the cost of normal farming operations, such as:

- Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment. The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment when feasible.
- Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps. The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilities to eliminate or reduce standby charges.

Direct and indirect impacts of increased competition for water resources
The County fails to evaluate the impact of increased competition for water resources caused by development allowed in the 2040 General Plan on either the conversion of agricultural land or the loss of agricultural lands through the loss of topsoil.

The EIR states on page 4.2-3 that "...a reduction in available water resources for irrigation" is an example of indirect impacts on agricultural land due to loss of topsoil from increased wind and water erosion.
But the County fails to analyze or propose mitigation measures to address this significant impact.



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Page 4 of 4

APAC is the expert charged with advising County decision-makers on agricultural issues in Ventura County. And the County should be seeking guidance from APAC about the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

CoLAB encourages APAC to provide guidance to the County on appropriate and effective mitigation measures to prevent the conversion of agricultural land to non-agricultural uses. These may include:

- 1) Strengthen the Right-to-Farm ordinance to prevent nuisance complaints from being used to justify the creation or expansion of setbacks or regulatory restrictions on normal farming practices;
- 2) Expand the Land Conservation Act Program to include Open Space zoned properties that are engaged in farming (including grazing); and
- 3) Protect agricultural land from urban-ag interface encroachment and compatibility conflicts by establishing setbacks on NON-AE-zoned land that will restrict the construction of bike paths, public trails, and sensitive receptors within 2000' of any land zoned A/E.

Thank you again for the opportunity to provide comments on this issue. We appreciate your consideration and leadership at this time.

Sincerely,

Louise Lampara Executive Director



In support of this letter-

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 2:51 PM
To: Simmons, Carrie
Subject: FW: General Plan / EIR Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

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From: Michael/Maggie McMonigle <mmmcmonigle@gmail.com>
Sent: Thursday, February 27, 2020 2:46 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Cc: Don and Bev de Nicola <de.nicola@cox.net>
Subject: General Plan / EIR Comments

To: Susan Curtis-

County failed to evaluate mitigation measure for feasibility- 500' set back for "sensitive receptors" from freeways and high traffic roads.

Mitigation Measure AQ-3 (Policy HAZ10-X) creates a minimum 500' set back for "sensitive receptors" from freeways and high traffic roads. Yet the County states in the Land Use section of the EIR that "the majority of the anticipated build out will be within the freeway corridors."

Has the County completed a "buildout study" to ensure that the establishment of this set back still leaves enough room for development to occur? Will this mitigation measure be economically feasible?

Margaret Chambers McMonigle

Marianne McGrath
c/o Hoffman, Vance & Worthington
1000 S. Seaward Avenue
Ventura, CA 93001

February 24, 2020

Ventura County Board of Supervisors
Attn: RMA Planning Division
General Plan Update
800 Victoria Avenue L#1740
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. McGrath', written over a horizontal line.

Marianne McGrath

What about public safety

Attention: Health & Safety

Date: 02/27/2020

What about public safety?

When I built my house at 209 Heavenly Valley Rd, Newbury Park in 1994, it was considered a single-family dwelling. Now 32% of the people on Heavenly Valley Rd rent out their rooms.

If they are a couple they have at least two cars. The houses in our neighborhood range from three to six bedrooms, and when they convert the garage into another unit, they really have a problem with the parking.

My neighbor has a six bedroom house with a bonus room of about 800 square feet. He currently rents out rooms inside his home. He is in the process of converting his garage into a 1200 square foot, three bedroom apartment and an office. He has enough parking for five cars in the driveway. This will require additional parking, but where will this parking be? I don't know, and I don't know that the county knows. It seems the permit was handed out without anyone doing due diligence to find out this answer.

If you do the math, and they have six bedrooms, and a bonus room, add the three bedroom apartment, and the office, how much parking is needed? Everyone in California has a car, and all these cars will be on the street.

Four times in the last 2 1/2 years an ambulance and a firetruck have been stuck to where either they had to wheel the patient down the street or go around the block because the street was blocked off by the parked cars. Again, the streets in this area are only 20 feet wide, and it forces people to park their cars on the street because of over occupancy.

There is also another problem. The street is a gateway to the Santa Monica Mountains which in the past has always been a huge fire concern. Please look on the map and you'll see the gateway I am speaking about. Who says that emergency personnel will be able to get up the street or down the street once these changes are implemented?

Has anyone asked the county/city fire department if they have had issues getting up this street? I hope so, and that should go on record what they had to say. I don't know whether to say no parking on the street or provide more parking but something needs to happen. These homes were meant to be only single-family dwellings and you've converted them into an apartment with absolutely no parking and when I talk to the building department they come up with some nonsense that there's a bus stop within half a mile, which it is slightly over that and we don't need parking, really.

The occupancy has changed but the code has done nothing for the safety or for the provisions of the people living here. It is my understanding that fire sprinklers are not mandatory, and why aren't they?

I hope you think of the public safety before you consider anymore garages changed into units, the Community demands more integrity than you're giving us.

Phillip Fuess (805 630 6212)

209 Heavenly Valley Rd
Newbury Park CA 91320

Phillipfuess@Hotmail.com

bev

From: Marshall C. Milligan <mcmilligan@gmail.com>
Sent: Tuesday, February 25, 2020 3:32 PM
To: susan.curtis@ventura.org; generalplanupdate@ventura.org
Subject: 2040 General Plan Draft EIR Comment

Ventura County Board of Supervisors

Attn: RMA Planning Division

General Plan Update

800 Victoria Avenue L#1740

Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

My family has owned for generations and continues to own agricultural properties in Ventura County, including mineral rights under a number of currently and previously owned parcels. I'm writing to you as an owner of mineral rights in Ventura County.

The 2040 General Plan Draft EIR fails to give proper analysis to mineral resources and must be corrected to more adequately and fairly assess the impact of the proposed general plan on owners of mineral rights.

Neither the EIR nor the Background Report provide a complete and thorough description of the existing regulations affecting the management and production of mineral resources in the County and the State of California. The EIR and the Background Report only disclose federal and state agencies that regulate pipelines and flaring, which is not applicable to all mineral resources that must be analyzed in an EIR under CEQA guidelines. The EIR should be revised to include an overview and description of all potential regulations, regulatory bodies, and programs that regulate mineral resources in Ventura County.

The EIR fails to analyze the direct and indirect impacts to mineral resource development as a result of the 2040 General Plan. The County admits that Land Use Designation changes in the 2040 General Plan will result in changes to land uses over known and important mineral reserves. But neither the EIR nor the Background Report provide any information regarding the anticipated "buildout" in terms of acreage, actual location, number of dwelling units, and development density and intensity.

As incompatible land uses (such as residential development) occur on or adjacent to mineral production and mineral reserves, compatibility conflicts will increase. Reasonably foreseeable indirect impacts include nuisance complaints, traffic conflicts, theft, vandalism and attempted trespass on mineral production sites. The EIR must analyze and evaluate these impacts on the ability to develop and manage mineral resources in the County.

Gaps in the 2040 General Plan Draft EIR must be corrected, and the Draft EIR recirculated, to fairly present the foreseeable impacts on owners of mineral rights in the County.

Sincerely,

Marshall C. Milligan

805-570-0332

FEB 27 2020 9:01 AM

VIA ELECTRONIC MAIL: GeneralPlanUpdate@ventura.org

February 25, 2020

Ventura County Board of Supervisors
Attn: RMA Planning Division
General Plan Update
800 Victoria Avenue L#1740
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually

impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

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Sincerely,

Gregory H. Smith

P.O. Box 25010
Ventura, CA 93002

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VIA ELECTRONIC MAIL: GeneralPlanUpdate@ventura.org

February 25, 2020

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800 Victoria Avenue L#1740
Ventura, California 93009-1740

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A handwritten signature in blue ink, appearing to read "Jeffrey P. Smith". The signature is fluid and cursive, with the first name being the most prominent.

2960 Solimar Beach Drive
Ventura, CA 93001

VIA ELECTRONIC MAIL: GeneralPlanUpdate@ventura.org

February 25, 2020

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General Plan Update
800 Victoria Avenue L#1740
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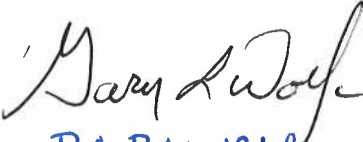
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P.O. Box 1268
Ventura, CA 93002

FEB 27 10:41:59 AM '20

VIA ELECTRONIC MAIL: GeneralPlanUpdate@ventura.org

February 25, 2020

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General Plan Update
800 Victoria Avenue L#1740
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Sincerely,

Katherine R. Ewyler

4465 West 4th Street
Los Angeles, CA 90020

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915 Las Palmas Drive
Santa Barbara, CA 93110

006 1007 12001
0027 20 AM 040

c/o Hoffman, Vance & Worthington
1000 S. Seaward Avenue
Ventura, CA 93001

February 24, 2020

Ventura County Board of Supervisors
Attn: RMA Planning Division
General Plan Update
800 Victoria Avenue L#1740
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

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Sean H. McGrath

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 3:12 PM
To: Simmons, Carrie
Subject: FW: Ventura County Board of Supervisors , Petition to VC Supervisors and Planners about VC2040 Draft General Plan and EIR
Attachments: petition-to-vc-supervisors-and-planners-about-vc2040-draft-general-plan-and-eir_signatures_202002271107.pdf

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740
Visit the Planning Division website at vcrma.org/planning
Ventura County General Plan Update. Join the conversation at VC2040.org
For online permits and property information, visit [VC Citizen Access](#)



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From: Christopher Tull via ActionNetwork.org <info@sg.actionnetwork.org>
Sent: Thursday, February 27, 2020 3:08 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: Ventura County Board of Supervisors , Petition to VC Supervisors and Planners about VC2040 Draft General Plan and EIR

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Ventura County Board of Supervisors ,

206 people have signed a petition on Action Network telling you to Petition to VC Supervisors and Planners about VC2040 Draft General Plan and EIR.

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With worsening climate change impacts, we reiterate and amplify the concerns the people expressed in January of last year about “climate change

and GHGs, and the effects of continued oil and gas extraction including secondary effects related to climate change, air quality, water quality, water supply, traffic, noise, odors, aesthetics, and hazards.”

Our county is warming faster than any other in the nation, our ocean is becoming more hostile to marine life, our last drought was the most intense and lasted longest, and our history of costly floods will be dwarfed when future atmospheric rivers pour over our valleys. Our house is on fire. We need a thorough plan and environmental impacts analysis based on the latest science.

Ventura County’s plan matters. Our larger cities are making climate action plans and look for your example of leadership. The environmental impact from what we do to mitigate climate impacts at the global scale is profoundly influential in trying to stop runaway climate change. This is explained in a new report Insights from the California Energy Policy Simulator about the role of the State of California in the world. Ventura County as a local government hit hardest by climate impacts must step up and meet serious goals. “Insights about California’s climate policies are at the forefront of global efforts to battle climate change. The state’s leadership and success so far have helped maintain momentum despite political headwinds. If California faltered, global efforts to reduce GHG emissions would be dealt a major setback. Meanwhile, the severe risks from runaway global warming are becoming more tangible as the state suffers from wildfires supercharged by climate change.”

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Summary is not even half finished. Some of the more serious impacts are missing from the draft analysis. Here are a few of our concerns:

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11. Develop and adopt building codes based on best practices for use of low embodied carbon concrete and set targets for use of low GHG concrete alternatives. Ex: Bay Area Air Quality Management District and King Co, WA.

12. Encourage climate-safe and climate-resilient development through zoning reform and removal of limits on height, density, and minimum parking requirements to enable and promote walkability and a mix of uses for homes and businesses, parks and transit.

13. Create a master local clean energy siting and funding plan for wholesale distributed solar energy plus storage in commercial scale projects producing energy needs by 2030.

14. Provide energy efficiency benchmarking and rebates for low-income housing and renters as well as low-interest loans for small businesses to reduce energy use; assist owners of existing buildings to switch from natural gas to electricity.

15. Prepare sustainable building, siting, landscaping and passive heating and cooling practice guidelines, with a priority on low-income housing, that reduce

consumption of non-renewable resources and that include climate and fire-safety in pre-approved plans.

16. Energy Efficiency to Reduce Electricity Use Use Energy Efficiency to Deliver 15% of Projected Needs for electricity in the county by 2023; and 30% by 2030.

17. Efficiency Building Standards for Retrofits Prioritize energy and water efficiency building standards and work to retrofit existing buildings.

18. Decarbonize County Buildings Develop a county building electrification plan eliminating natural gas use in County-owned facilities.

19. Decarbonize All Building Types Develop an electrification plan with goals for GHG emission reductions through renewable energy that evaluates and prioritizes programs for local solar, energy storage and demand response (DR) that disconnects all buildings from gas service by 2050. Include incentives for deep retrofits of inefficient buildings.

Agriculture:

1. Integrated Pest Management where toxic pesticides are a last resort.

Create a program that promotes the principles (systems approach, building trust, and effective communication) and pursues the recommendations of the Roadmap for Integrated Pest Management from the University of California and CA Department of Pesticide Regulation. Environmental impacts from toxic pesticides are not described in the Background Report. The Roadmap to an Organic California Policy Report by CCOF Foundation offers information for mitigations and climate action. A workshop is needed.

2. Inorganic Nitrogen Based Fertilizers Set benchmarks for reducing use of inorganic N fertilizer and encourage optimized use of organic and inorganic fertilizer for greatest efficiency in closed nutrient cycles, monitor for nutrient runoff from fields and encourage the use of cover crops and green manure crops to reduce or avoid nitrous oxide (N₂O) emissions and nutrient runoff.

3. Diversified Cropping Systems Encourage farmers to include 1 – 5% of beneficial insect attracting plants in a planted crop, and other methods, such as crop rotation, perennial mowed cover crop in orchards, and integrating multiple species or varieties to enhance the biological and economic stability by spreading economic risk and buffering against pest invasions and extreme weather events, and increase carbon sequestration.

4. Reward Regenerative Farmers with Digestate and Compost from Food

Waste Research feasibility of a program for composting food waste for use by farmers and landscapers who use regenerative practices that sequester certified amounts of CO₂.

Water Resources:

1. At least 30,000 acre-feet per year must come from storm water capture by 2035
2. All rainfall must be retained onsite in soil and reservoirs.
3. Slow It. Spread It. Sink It! The County shall enforce Best Management Practices (BMP) and Low Impact Development (LID) for new developments.
4. Recycle all wastewater for beneficial reuse by 2035.
5. Reduce potable water use per capita by 22% by 2025 and 25% by 2035: Offer incentives for water conservation features, including drought tolerant landscaping, permeable materials in standard parkway design guidelines, street trees, infiltration, greywater, and water-saving plumbing.
6. Close oil and gas wells and injection wells near aquifers as a top priority.
7. Create a Master Plan to develop the full potential of integrated water management to infiltrate the ground and recharge aquifers; support reforestation and restoration of watershed ecosystems; conserve and protect groundwater resources, and clean up creeks, streams, and estuaries.
8. Support Santa Clara River Loop Trail and Ventura River Trail Development

Economic Vitality:

1. Agricultural Diversification should include reference to regenerative practices to create biodiversity with opportunities for community members to visit farms.
2. Small Business Promotion. Support approval of caretaker residential space on business property to reduce VMT and more financial strength for small businesses.
3. Green Economy. Prioritize youth and immigrants for workforce development in industries that promote and enhance environmental sustainability, including GHG reductions, climate adaptation, resiliency and local renewable energy generation, storage and distribution, including solar power, wind power, wave energy, regenerative organic farming and value-added agriculture-related activities, and other appropriate renewable sources.
4. Maritime Economy. Facilitate a sustainable maritime economy using

restorative aquaculture techniques that restore ocean health and biodiversity while reviving pre-human fisheries abundance. For example, restore sand-bottom kelp forests and increase kelp forests with flexible floating fishing reefs where the seafloor is otherwise too deep for kelp.

5. Promote Fire-Resistant Infill and Revitalization. Encourage infill development that serves as firebreak rather than as additional fuel for wildfires.

6. Create a Collaborative Structure for Innovation for a Resilient Future. The structure should be able to make decisions and create a way forward for zoning, building and materials and environmental health to allow options for a resilient future, include government officials, innovators and public as described in submissions from Sustainable Living Research Initiative.

7. Parking Infrastructure. Develop parking policies to reduce single occupancy trips associated with employees and business activity to reduce Vehicle Miles Traveled.

8. Master Plan for Distributed Energy Resources and Community Microgrids. Prepare a map of siting options for renewable energy generation and storage facilities and coordinate the identification of financing options for renewable energy resource development, including solar, wind, wave, storage and community microgrids both in front of and behind the meter.

In summary, with the accelerating tipping points, we cannot go half-way in our vision. We need extraordinary courage to set goals we can hang our hopes and efforts on. We want completeness and clarity so we can see how the emissions reduction plan adds up. We want respect for climate science to tell us the truth. We want more ambition. A 2016 decision of the state legislature in SB32 is just not good enough as a goal. We want to see a systematic plan that will assure carbon neutrality no later than 2045.

You can view each petition signer and the comments they left you in the attached PDF.

Thank you,

Christopher Tull



Sent via Action Network, a free online toolset anyone can use to organize. [Click here to sign up](#) and get started building an email list and creating online actions today.

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19. Decarbonize All Building Types Develop an electrification plan with goals for GHG emission reductions through renewable energy that evaluates and prioritizes programs for local solar, energy storage and demand response (DR) that disconnects all buildings from gas service by 2050. Include incentives for deep retrofits of inefficient buildings.

Agriculture:

1. Integrated Pest Management where toxic pesticides are a last resort. Create a program that promotes the principles (systems approach, building trust, and effective communication) and pursues the recommendations of the Roadmap for Integrated Pest Management from the University of California and CA Department of Pesticide Regulation. Environmental impacts from toxic pesticides are not described in the Background Report. The Roadmap to an Organic California Policy Report by CCOF Foundation offers information for mitigations and climate action. A workshop is needed.
2. Inorganic Nitrogen Based Fertilizers Set benchmarks for reducing use of inorganic N fertilizer and encourage optimized use of organic and inorganic fertilizer for greatest efficiency in closed nutrient cycles, monitor for nutrient runoff from fields and encourage the use of cover crops and green manure crops to reduce or avoid nitrous oxide (N₂O) emissions and nutrient runoff.
3. Diversified Cropping Systems Encourage farmers to include 1 – 5% of beneficial insect attracting plants in a planted crop, and other methods, such as crop rotation, perennial mowed cover crop in orchards, and integrating multiple species or varieties to enhance the biological and economic stability by spreading economic risk and buffering against pest invasions and extreme weather events, and increase carbon sequestration.
4. Reward Regenerative Farmers with Digestate and Compost from Food Waste Research feasibility of a program for composting food waste for use by farmers and landscapers who use regenerative practices that sequester certified amounts of CO₂.

Water Resources:

1. At least 30,000 acre-feet per year must come from storm water capture by 2035
2. All rainfall must be retained onsite in soil and reservoirs.
3. Slow It. Spread It. Sink It! The County shall enforce Best Management Practices (BMP) and Low Impact Development (LID) for new developments.
4. Recycle all wastewater for beneficial reuse by 2035.
5. Reduce potable water use per capita by 22% by 2025 and 25% by 2035: Offer incentives for water conservation features, including drought tolerant landscaping, permeable materials in standard parkway design guidelines, street trees, infiltration, greywater, and water-saving plumbing.
6. Close oil and gas wells and injection wells near aquifers as a top priority.
7. Create a Master Plan to develop the full potential of integrated water management to infiltrate the ground and recharge aquifers; support reforestation and restoration of watershed ecosystems; conserve and protect groundwater resources, and clean up creeks, streams, and estuaries.
8. Support Santa Clara River Loop Trail and Ventura River Trail Development

Economic Vitality:

1. Agricultural Diversification should include reference to regenerative practices to create biodiversity with opportunities for community members to visit farms.
2. Small Business Promotion. Support approval of caretaker residential space on business property to reduce VMT and more financial strength for small businesses.
3. Green Economy. Prioritize youth and immigrants for workforce development in industries that promote and enhance environmental sustainability, including GHG reductions, climate adaptation, resiliency and local renewable energy generation, storage and distribution, including solar power, wind power, wave energy, regenerative organic farming and value-added agriculture-related activities, and other appropriate renewable sources.
4. Maritime Economy. Facilitate a sustainable maritime economy using restorative aquaculture techniques that restore ocean health and biodiversity while reviving pre-human fisheries abundance. For example, restore sand-bottom kelp forests and increase kelp forests with flexible floating fishing reefs where the seafloor is otherwise too deep for kelp.
5. Promote Fire-Resistant Infill and Revitalization. Encourage infill development that serves as firebreak rather than as additional fuel for wildfires.
6. Create a Collaborative Structure for Innovation for a Resilient Future. The structure should be able to make decisions and create a way forward for zoning, building and materials and environmental health to allow options for a resilient future, include government officials, innovators and public as described in submissions from Sustainable Living Research Initiative.
7. Parking Infrastructure. Develop parking policies to reduce single occupancy trips associated with employees and business activity to reduce Vehicle Miles Traveled.
8. Master Plan for Distributed Energy Resources and Community Microgrids. Prepare a map of siting options for renewable energy generation and storage facilities and coordinate the identification of financing options for renewable energy resource development, including solar, wind, wave, storage and community microgrids both in front of and behind the meter.

In summary, with the accelerating tipping points, we cannot go half-way in our vision. We need extraordinary courage to set goals we can hang our hopes and efforts on. We want completeness and clarity so we can see how the emissions reduction plan adds up. We want respect for climate science to tell us the truth. We want more ambition. A 2016 decision of the state legislature in SB32 is just not good enough as a goal. We want to see a systematic plan that will assure carbon neutrality no later than 2045.

You can view each petition signer and the comments they left you below.

Thank you,

Christopher Tull

1. Andrew Abate (ZIP code: 93001)

2. Adam Kaiserman (ZIP code: 93001)

3. Allen Pobirs (ZIP code: 93004)

4. Ally Gialketsis (ZIP code: 93003)

5. Noah Aist (ZIP code: 93004)

6. Alexander Verharen (ZIP code: 93001)

7. Allison Maires (ZIP code: 93003)

Climate Change needs to be our county's top priority, we are in jeopardy. Please have it figure prominently in the General Plan.

8. Emiliano Amaro (ZIP code: 93036)

9. Alli Fish (ZIP code: 93001)

10. Andrew Ellison (ZIP code: 93023)

11. Angela Romero (ZIP code: 93003)

12. Annette Halpern (ZIP code: 93004)

13. Arnett Smithson (ZIP code: 93004)

14. Ellen Smith (ZIP code: 93010)

I support this petition!

15. Rebecka Hutchins (ZIP code: 92701)

Dear Ventura County Supervisors,

Global warming is happening right now we would like for you to consider our climate solutions, so we can live and breathe in a healthier and cleaner environment.

Sincerely,

Rebecka

16. Barbara Leighton (*ZIP code: 91320*)

17. Ben Werner (*ZIP code: 93101*)

18. elizabeth shipley (*ZIP code: 93041*)

19. Bryan Farin (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Bryan

20. Luis Campa (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Luis

21. Jeannette Welling (*ZIP code: 91362*)

22. brian rasnow (*ZIP code: 91320*)

We need to follow the science and not discount the future for short term, unsustainable, rewards.

23. Brigid Morales (*ZIP code: 93003*)

24. Cesar Vega (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Global warming is happening right now we would like for you to consider our climate solutions, so we can live and breathe in a healthier and cleaner environment.

Sincerely,

Cesar

25. Candie Lange (*ZIP code: 93022*)

26. Carol Hart (*ZIP code: 93001*)

27. Catherine Forbes (*ZIP code: 92374*)

28. Charles Myers (*ZIP code: 93022*)

29. Anthony Krzywicki (*ZIP code: 93001*)

30. Chelsea Sutula (*ZIP code: 93023*)

we need to do better

31. Christina Pasetta (*ZIP code: 90405*)

-CARBON NEUTRAL 2028

-INDEPENDENT EIR

-ACCEPT AND SUPPORT CFROG AND SURFRIDER POLICY RECOMMENDATIONS

32. Charmaine Feria (*ZIP code: 9303e*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Charmaine

33. Christine Johnston (*ZIP code: 93015*)

34. Claire Williams (*ZIP code: 91301*)

35. Christopher Tull (*ZIP code: 93036*)

36. Denice Avila (*ZIP code: 93012*)

37. Craig Juan (*ZIP code: 92128*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely

38. David Gilbertson (*ZIP code: 93012*)

The VC General Plan must identify specific actions to address the impacts of our Climate Crisis. The current draft General Plan lacks specific measurable actions to reduce GHG emissions.

I support this petition and its recommendations.

39. Dee Reid (*ZIP code: 93023*)

40. Cheryl Dilks (*ZIP code: 93035*)

41. Daniel Jordan, PhD (*ZIP code: 93035*)

42. DANIEL TWEDT (*ZIP code: 91360*)

As a CERT-trained Extra Class Amateur Radio Operator, (KK6VDR) I believe we can recruit Ventura County's Hams into finding various Citizen Science Initiatives to assist with the regenerative steps we need to save our shared biosphere.

43. Douglas Johannes (*ZIP code: 93004*)

44. Dulce Satterfield (*ZIP code: 93041*)

45. Doug DuBois (*ZIP code: 93001*)

46. liz lamar (*ZIP code: 93033*)

47. Elisha Borcena (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on our global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Elisha

48. Elizabeth Rice (*ZIP code: 93010*)

49. Elizabeth Billiot (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Elizabeth

50. Erica Ramirez (*ZIP code: 93003*)

51. Pat Browne (*ZIP code: 93012*)

52. Emma Aist (*ZIP code: 93004*)

53. Amber Bassett (*ZIP code: 93003*)

It is absolutely crucial that all efforts to create carbon neutral communities happens before 2045. Our climate in particular is affected by this.

54. Erlinda Farala (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on our global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Erlinda

55. Erlinda Farala (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about climate change and it's effects on global warming.

Thank you,

Erlinda

56. Faith Grant (*ZIP code: 91361*)

We need to have strong climate policies in Ventura. It's going to take major changes to even slow down climate change. Please listen to the electorate and endorse strong climate policies.

57. Jennifer Farin (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Jennifer

58. Fiona Bremner (*ZIP code: 93003*)

59. Judith Wilson (*ZIP code: 93003*)

60. Gabriel Sandosham (*ZIP code: 95112*)

61. Gael Belden (*ZIP code: 93023*)

62. Geoffrey Dann (*ZIP code: 93003*)

The county must plan to mitigate the effects of climate change and help slow or reverse climate change. We should set an example for the rest of the country.

63. Gordon Clint (*ZIP code: 91320*)

64. gail hubbs (*ZIP code: 91320*)

65. George Vye (*ZIP code: 93004*)

66. Ashley Basquez (*ZIP code: 93012*)

Dear Ventura County Supervisors,

Please take care of our Climate Change Challenges for our future children and their children's children. Our land is so precious. We are the 5th richest county in Southern California and can make a positive impact.

Sincerely,
Ash

67. grant marcus (*ZIP code: 93001*)

68. Gene Fox (*ZIP code: 93004*)

69. Gwen Bell (*ZIP code: 93023*)

70. Helen Dziadulewicz (*ZIP code: 93010*)

71. Leicy Grace (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about climate change and it's effects on global warming.

Thank you,

Leicy

72. Michelle Cabrera (*ZIP code: 93001*)

73. Jack Weber (*ZIP code: 93023*)

Climate policy must be a priority; cease all fossil fuels and witch to renewables and make biking more safe! Thank you...

74. Jackson Piper (ZIP code: 91320)

This general plan will shape how development occurs in Ventura County in the near future and will affect the lives of County residents beyond the timeframe of the plan. It is essential that the plan acknowledges and does everything possible to prepare Ventura County and its residents for the dangers that we face due to climate change - whether or not some of our fellow residents wish to acknowledge that danger or our agency as a society in working to minimize its impact. Please improve upon the Draft General Plan by incorporating the suggestions of the Climate Hub into the final document, so that Ventura County and its residents can more effectively protect this place that is special to all of us.

75. Judy Duerr (ZIP code: 93004-1228)

76. Jaira Farala (ZIP code: 93030)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Jaira

77. James Brehm (ZIP code: 93001)

78. Janet Sager Knott (ZIP code: 93023)

79. Jan Dietrick (ZIP code: 93001)

80. Jeff Otterbein (ZIP code: 93023)

81. Jennaci Feria (ZIP code: 93030)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Jennaci

82. Jenny Pandol (ZIP code: 93001)

83. Jamee Faral (ZIP code: 93030)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Jamee

84. Jonathan Farin (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Jonathan

85. Jeff Farin (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Jeff

86. James Merrill (*ZIP code: 93033-7965*)

87. James Whitney (*ZIP code: 93001-1491*)

We need to act now, the climate will not take a time out for us to mull it over.

88. Joyce McIntire (*ZIP code: 91320*)

89. Jimmy Vasquez (*ZIP code: 93003*)

90. Karen Trowbridge (*ZIP code: 93035*)

We need to do everything possible to divert the impact of climate change or rather climate crisis here in Ventura County? We must act now!!!!

91. Joan Nygren (*ZIP code: 93023*)

We all need to take this seriously

92. Joe Connett (*ZIP code: 93001*)

Addressing climate change must be a priority!

93. John Brooks (*ZIP code: 93022*)

The climate action plan must be clear, drastic and enforceable.

94. Jon Wilk (*ZIP code: 93023*)

95. Jennie Altice (*ZIP code: 92128*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Jennie

96. Josie Sabalerio (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Josie

97. Karen Farin (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Karen

98. Karen Farin (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Karen

99. Karen Sher (*ZIP code: 93012*)

100. Karina Kaye (*ZIP code: 93035*)

101. Kate Higgins (*ZIP code: 93004*)

Vote Kim Stephenson for Cty Supervisor, District 3

102. Kathleen Wheeler (*ZIP code: 93003*)

103. Kaysha Farala (ZIP code: 93033)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on our global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Kaysha

104. Keith Nieves (ZIP code: 93001)

105. Kristen Kessler (ZIP code: 93004)

106. Katharine Merrill (ZIP code: 93033-7965)

We need to create a climate plan that is grounded in good science, and that means counting all the green house gas emissions from all sources.

107. Katherine Mack (ZIP code: 03023)

108. Kathleen Nolan (ZIP code: 93023)

109. Layla White (ZIP code: 93030)

Dear Ventura County Supervisors,

Please consider taking care of our climate and reducing the effects of global warming.

Sincerely,

Layla

110. Krystal Anderson (ZIP code: 92071)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Krystal

111. Diana Kubilos (ZIP code: 93004)

112. Kevin Ward (ZIP code: 93036)

The time is now for transitioning to non-fossil fuel products, all of them.

Solar, permaculture and voting for Bernie is a good defense against global warming already evident in fires, floods and, like Coronavirus, microbes. Any delay will make the US complicit with chosen

extinction. Think Green New Deal or nada.

113. Kristofer Young (ZIP code: 93023)

The climate portions of the general plan lacks specific, critical goals and mechanisms to ensure achieving them. We do not have time to waste.

114. Kyle Pobirs (ZIP code: 93004)

115. Lauren Mendez (ZIP code: 93030)

116. Lorren Carter (ZIP code: 92064)

Dear Ventura County Supervisors,

Global warming is happening right now we would like for you to consider our climate solutions, so we can live and breathe in a healthier and cleaner environment.

Sincerely,

Starsha

117. LeeAnne Christensen (ZIP code: 93021)

118. Leopoldo Lopez (ZIP code: 93003)

119. Leslie Purcell (ZIP code: 93001)

120. Yusef Kilea (ZIP code: 93035)

121. Liz Campos (ZIP code: 93002)

122. Sio Arden (ZIP code: 9303p)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Sio

123. Willard Lubka (ZIP code: 91362)

124. Lupe Anguiano (ZIP code: 93033-3449)

I continue expressing strong support for the recommendations made by CFROG and Climate Hub to the Ventura Country's 2040 DraftvGeneral Plan and EIR.

125. Madalitso Kalinde (ZIP code: 2461)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Madalitso

126. Mary Ann Krause (ZIP code: 93060)

127. Mary Nelson (ZIP code: 93036)

It is way past time to take action. Step up!

128. Maria Ornelas (ZIP code: 91320)

129. Marlena Roberts (ZIP code: 93041)

130. Marlene Breitenbach (ZIP code: 93035)

131. Martha Wolter (ZIP code: 93001)

132. Martha Fellows (ZIP code: 93023)

133. Martha Martinez-Bravo (ZIP code: 93012)

134. Meridel Carson (ZIP code: 93041)

135. Merrill Berge (ZIP code: 93010)

Since the General Plan process began we have seen horrific wildfires, sea level rise reports and been designated the warmest county in the lower 48. The next 20 years will only increase the impacts of climate change...Ventura County's General Plan must address this new reality with measurable, actionable policies that reduce our carbon emissions right here and right now.

136. Michele Burns (ZIP code: 93004)

137. Michelle Ellison (ZIP code: 93023)

138. Mina Nichols (ZIP code: 93036)

The good news is: if we admit that humans influence the weather, it's just a matter of time before we control the weather.

139. Mary Stanistreet (ZIP code: 93003)

140. Kari Aist (ZIP code: 93004)

141. Monica Gray (ZIP code: 93001)

142. Steven Nash (ZIP code: 93036)

Climate change must have primacy above all other significant impacts.

143. Dee Kiana Laborte (ZIP code: 93010)

144. Tim Nafziger (ZIP code: 93022)

Ventura County needs a robust climate component of our new general plan.

145. Nancy Merrick (ZIP code: 93003-242-)

146. norma gochin (ZIP code: 91362)

We need to address climate change, and we need to address it now. Our planet will not survive if we don't make plans immediately.

147. Nicolette Walker-Itza (ZIP code: 93023-2230)

148. Jaclyn Fillingame (ZIP code: 93060)

149. Nancy Tamarin (ZIP code: 91362-3212)

150. Denise Coin (ZIP code: 93001)

151. Karissa Sandoval (ZIP code: 93010)

152. Vickie Peters (ZIP code: 93023)

153. Olivia Lopez (ZIP code: 93030)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Olivia

154. Celia Ortenberg (ZIP code: 93030)

155. Pamela Lopez (ZIP code: 91362)

156. Pam Shellenbarger (ZIP code: 93001)

157. Paul Aist (ZIP code: 93004)

158. Margaret (Peg) Strobel (*ZIP code: 93003*)

The General Plan must take into account rapid, serious changes--drought and wildfires being the most obvious--from climate change. Since agriculture is a critical part of our economy, attention must be paid to that industry. Also important will be funding a way to seriously reduce oil and gas production, since it contributes to climate change. Plans to train workers to transition to new economic opportunities from climate-friendly industries must be planned. New and existing housing needs to be considered (weatherization to reduce electrical use from air conditioning). Climate change will impact everything that county government does.

159. Phil McGrath (*ZIP code: 93010*)

160. Rachelle Feria (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Rachelle

161. Randall Edwards (*ZIP code: 91362*)

162. Ray Powers (*ZIP code: 93023*)

A thorough analysis and comprehensive climate action needs to be part of the general plan update. What's is currently being proposed is not sufficient.

163. Ricardo Lopez (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Ricardo

164. Robert Dodge (*ZIP code: 93023*)

Climate change and its effects are one of our greatest existential threats and we must move away from a carbon based extractive economy as soon as possible. We urge you on behalf of the health and wellbeing of Ventura County and all of our citizens to adopt the strongest possible environmental protection in the Draft General Plan.

165. Ron Whitehurst (*ZIP code: 93001*)

We need to move to regenerative organic farming and landscaping to re-establish the small water cycles.

166. Ron Merkord (*ZIP code: 93015*)

Rising CO2 levels will soon have consequences for everyone, and Ventura County will see the first of

some of these effects, like increased wildfires and rising sea levels. We need to quit waiting for someone else to do something about it. Our own General Plan update is a great place to start.

167. Rominck Callo (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please consider taking care of our climate and reducing the effects of global warming.

Sincerely,

Romnick

168. rosemary fields (*ZIP code: 93004*)

Climate change affects the entire world all animals and humans.

169. Siomara Ardon (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Siomara

170. Scott eckersley (*ZIP code: 93023*)

171. Karen Karayan (*ZIP code: 93060*)

This is one of my top concerns! I worry about our children and their children's world if we don't do as much as we can to protect and heal our world! Ventura County can be one of the leaders in this effort!

172. Sarah Fleury (*ZIP code: 93060*)

173. Sasha Phan (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please consider taking care of our climate and reducing the effects of global warming.

Sincerely,

Sasha

174. Sonia Kroth (*ZIP code: 93001*)

175. Sharon Ray (*ZIP code: 93105*)

176. Starsha Farala (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about the effects of climate change as it is currently happening. Please strongly do something about the impact towards global warming in our environment.

Sincerely,

Starsha Farala

177. steve nipper (*ZIP code: 93023*)

Because it's the right thing to do!

178. Steve Pinsky (*ZIP code: 93001*)

179. Kristin Storey (*ZIP code: 93023*)

180. Susan Williamson (*ZIP code: 93023*)

Get with you guys! Ventura is a coastal city! Duhhh. You need to host a climate convention to get input on what needs to be done in VC!

181. Susan Curtis (*ZIP code: 91361*)

182. Francesa Gonzales (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on our global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Francesa

183. Arthur Snyder (*ZIP code: 93036*)

Global warming is an existential threat.

184. Paul Burke (*ZIP code: 93012*)

185. Tessa Salzman (*ZIP code: 93001*)

186. Tina Frugoli (*ZIP code: 91362*)

187. Catherine Myers (*ZIP code: 93004*)

188. theresa hartigan (*ZIP code: ?93022*)

189. thomas miller (*ZIP code: 93004*)

190. Thomas Seigner (ZIP code: 91361)

Each new climate study outlines a more dire situation than the previous study. Even if we went carbon neutral today, future generations will still experience hardships we have not. NO MORE NEW FOSSIL FUEL PRODUCTION IN VENTURA COUNTY.

191. Tamara Hoyt (ZIP code: 93001)

Please address the climate crisis now

192. Todd Shuman (ZIP code: 93010)

I endorse this petition! It is time that Ventura County increase its commitment to reduce GHG emissions ...

193. Christine Samusick (ZIP code: 93001)

We need a desalination plant. Yesterday.

Water recycling must be encouraged and accommodated.

All styrofoam must be banned.

This is a partial list of actions that will help Ventura through this continual drought and help ease the burden on our landfill.

194. Vicki DeBear (ZIP code: 91311)

195. Vilma Pineda (ZIP code: 93033)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Vilma

196. Lori Bates (ZIP code: 93035)

197. Margot Davis (ZIP code: 93001)

The planning commission, or whoever it was that drafted the DEIR , I don't understand how they could have so missed the boat? I hope the board of supervisors will not miss the boat entirely and OK this general plan update the way it stands

198. Wilson Altice (ZIP code: 92128)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Wilson



Carolyn Diacos
c/o Hoffman, Vance & Worthington
1000 S. Seaward Avenue
Ventura, CA 93001

February 24, 2020

Ventura County Board of Supervisors
Attn: RMA Planning Division
General Plan Update
800 Victoria Avenue L#1740
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

Sincerely,

A handwritten signature in black ink, appearing to read "Carolyn Diacos". The signature is written in a cursive, somewhat stylized font.

Carolyn Diacos

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 3:12 PM
To: Simmons, Carrie
Subject: FW: Ventura County Board of Supervisors , Petition to VC Supervisors and Planners about VC2040 Draft General Plan and EIR
Attachments: petition-to-vc-supervisors-and-planners-about-vc2040-draft-general-plan-and-eir_signatures_202002271109.pdf

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740
Visit the Planning Division website at vcrma.org/planning
Ventura County General Plan Update. Join the conversation at VC2040.org
For online permits and property information, visit [VC Citizen Access](#)



Pursuant to the California Public Records Act, email messages retained by the County may constitute public records subject to disclosure.

From: Christopher Tull via ActionNetwork.org <info@sg.actionnetwork.org>
Sent: Thursday, February 27, 2020 3:09 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: Ventura County Board of Supervisors , Petition to VC Supervisors and Planners about VC2040 Draft General Plan and EIR

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

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2. CTM 3-9 to widen SR 118 has a significant environmental impact.

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4. Parking programs should be included in ways that reduce single-occupancy car trips.

Public Facilities, Services, and Infrastructure:

1. Enroll residents in a program to reduce CO2 emissions in their neighborhoods. Ex: Cool Block or Transition Streets.
2. PFS 2.1 must be revised to say include rather than encourage 'Sustainable Plans and Operations' in order to be considered a mitigation of climate change impacts from greenhouse gas emissions.
3. Policy PFS 7.1 should be revised to delete the need for access to gas. The environmental impact from use of natural gas requires carbonizing buildings beginning with no gas connections to new residences . It is therefore contradictory to ensure access to gas.
4. Local renewable energy generation must be part of the mitigation plan for reducing transmission facility fire hazard risk. This is not the same as "Smart Grid Technology". You need experts who know the cutting edge of this field to help write coherent policy on this topic.
5. Zero Waste The County shall achieve zero waste (via a suite of policies to reduce, reuse, and recycle) with no organic waste going to landfills by 2023
6. Zero Waste Policy for Meetings and Events Design and implement a zero waste policy for meetings and events sponsored or permitted by the County to minimize waste and rescue surplus edible food
7. Compostable Take-Out Foodware Require that take-out foodware be made with material compostable in solid waste processing facilities within 60 days
8. Reduce Solid Waste by Phasing Out Single-Use Plastic Evaluate how to best reduce solid waste generation per capita by at least 15% by 2030 including phasing out single-use plastics including but not limited to plastic straws, plastic utensils, plastic take-out containers, and expanded polystyrene
9. Ban Expanded Polystyrene

Conservation and Open Space:

1. Reduce oil and gas production by 40% by 2025 via higher monitoring standards and 2500 ft buffer zones near sensitive sites; reduce production to zero by no later than 2040.
2. Phase-Out of Oil and Gas Production The County shall prohibit new drilling and shall regulate existing wells to assure steady closing of wells beginning near residential and commercial areas.
3. Maintain Policy COS-7.8 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to collect gases

and use or remove them for sale or proper disposal instead of flaring or venting. Flaring should be allowed only in cases of emergency or for testing purposes.

4. Maintain Policy COS-7.7 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to convey oil and produced water via pipelines instead of trucking.

5. Detect and curb methane emissions from “super-emitter” sites as identified by NASA.

6. Tax oil and gas production, and related uncaptured methane to raise the needed revenues to fund urgent climate programs to replace high-emission vehicles with a priority on trucking and freight companies, fishing businesses, general contractors and K-12 schools.

7. Require a fully accountable performance bond for all new wells to cover cost of closure Cite LAT article (maybe put on website and link to it).

8. Establish an insurance fund that oil and gas producers contribute to that will cover accidents and closing wells if the producer goes bankrupt.

9. Ban gas-fueled lawn and garden equipment. (Ex: City of Ojai)

10. Accelerate capture of legacy HFCs Enlist the public and private to find and destroy existing stocks of HFC's (refrigerant gases with extremely high Global Warming Potential).

11. Develop and adopt building codes based on best practices for use of low embodied carbon concrete and set targets for use of low GHG concrete alternatives. Ex: Bay Area Air Quality Management District and King Co, WA.

12. Encourage climate-safe and climate-resilient development through zoning reform and removal of limits on height, density, and minimum parking requirements to enable and promote walkability and a mix of uses for homes and businesses, parks and transit.

13. Create a master local clean energy siting and funding plan for wholesale distributed solar energy plus storage in commercial scale projects producing energy needs by 2030.

14. Provide energy efficiency benchmarking and rebates for low-income housing and renters as well as low-interest loans for small businesses to reduce energy use; assist owners of existing buildings to switch from natural gas to electricity.

15. Prepare sustainable building, siting, landscaping and passive heating and cooling practice guidelines, with a priority on low-income housing, that reduce

consumption of non-renewable resources and that include climate and fire-safety in pre-approved plans.

16. Energy Efficiency to Reduce Electricity Use Use Energy Efficiency to Deliver 15% of Projected Needs for electricity in the county by 2023; and 30% by 2030.

17. Efficiency Building Standards for Retrofits Prioritize energy and water efficiency building standards and work to retrofit existing buildings.

18. Decarbonize County Buildings Develop a county building electrification plan eliminating natural gas use in County-owned facilities.

19. Decarbonize All Building Types Develop an electrification plan with goals for GHG emission reductions through renewable energy that evaluates and prioritizes programs for local solar, energy storage and demand response (DR) that disconnects all buildings from gas service by 2050. Include incentives for deep retrofits of inefficient buildings.

Agriculture:

1. Integrated Pest Management where toxic pesticides are a last resort. Create a program that promotes the principles (systems approach, building trust, and effective communication) and pursues the recommendations of the Roadmap for Integrated Pest Management from the University of California and CA Department of Pesticide Regulation. Environmental impacts from toxic pesticides are not described in the Background Report. The Roadmap to an Organic California Policy Report by CCOF Foundation offers information for mitigations and climate action. A workshop is needed.

2. Inorganic Nitrogen Based Fertilizers Set benchmarks for reducing use of inorganic N fertilizer and encourage optimized use of organic and inorganic fertilizer for greatest efficiency in closed nutrient cycles, monitor for nutrient runoff from fields and encourage the use of cover crops and green manure crops to reduce or avoid nitrous oxide (N₂O) emissions and nutrient runoff.

3. Diversified Cropping Systems Encourage farmers to include 1 – 5% of beneficial insect attracting plants in a planted crop, and other methods, such as crop rotation, perennial mowed cover crop in orchards, and integrating multiple species or varieties to enhance the biological and economic stability by spreading economic risk and buffering against pest invasions and extreme weather events, and increase carbon sequestration.

4. Reward Regenerative Farmers with Digestate and Compost from Food

Waste Research feasibility of a program for composting food waste for use by farmers and landscapers who use regenerative practices that sequester certified amounts of CO₂.

Water Resources:

1. At least 30,000 acre-feet per year must come from storm water capture by 2035
2. All rainfall must be retained onsite in soil and reservoirs.
3. Slow It. Spread It. Sink It! The County shall enforce Best Management Practices (BMP) and Low Impact Development (LID) for new developments.
4. Recycle all wastewater for beneficial reuse by 2035.
5. Reduce potable water use per capita by 22% by 2025 and 25% by 2035: Offer incentives for water conservation features, including drought tolerant landscaping, permeable materials in standard parkway design guidelines, street trees, infiltration, greywater, and water-saving plumbing.
6. Close oil and gas wells and injection wells near aquifers as a top priority.
7. Create a Master Plan to develop the full potential of integrated water management to infiltrate the ground and recharge aquifers; support reforestation and restoration of watershed ecosystems; conserve and protect groundwater resources, and clean up creeks, streams, and estuaries.
8. Support Santa Clara River Loop Trail and Ventura River Trail Development

Economic Vitality:

1. Agricultural Diversification should include reference to regenerative practices to create biodiversity with opportunities for community members to visit farms.
2. Small Business Promotion. Support approval of caretaker residential space on business property to reduce VMT and more financial strength for small businesses.
3. Green Economy. Prioritize youth and immigrants for workforce development in industries that promote and enhance environmental sustainability, including GHG reductions, climate adaptation, resiliency and local renewable energy generation, storage and distribution, including solar power, wind power, wave energy, regenerative organic farming and value-added agriculture-related activities, and other appropriate renewable sources.
4. Maritime Economy. Facilitate a sustainable maritime economy using

restorative aquaculture techniques that restore ocean health and biodiversity while reviving pre-human fisheries abundance. For example, restore sand-bottom kelp forests and increase kelp forests with flexible floating fishing reefs where the seafloor is otherwise too deep for kelp.

5. Promote Fire-Resistant Infill and Revitalization. Encourage infill development that serves as firebreak rather than as additional fuel for wildfires.

6. Create a Collaborative Structure for Innovation for a Resilient Future. The structure should be able to make decisions and create a way forward for zoning, building and materials and environmental health to allow options for a resilient future, include government officials, innovators and public as described in submissions from Sustainable Living Research Initiative.

7. Parking Infrastructure. Develop parking policies to reduce single occupancy trips associated with employees and business activity to reduce Vehicle Miles Traveled.

8. Master Plan for Distributed Energy Resources and Community Microgrids. Prepare a map of siting options for renewable energy generation and storage facilities and coordinate the identification of financing options for renewable energy resource development, including solar, wind, wave, storage and community microgrids both in front of and behind the meter.

In summary, with the accelerating tipping points, we cannot go half-way in our vision. We need extraordinary courage to set goals we can hang our hopes and efforts on. We want completeness and clarity so we can see how the emissions reduction plan adds up. We want respect for climate science to tell us the truth. We want more ambition. A 2016 decision of the state legislature in SB32 is just not good enough as a goal. We want to see a systematic plan that will assure carbon neutrality no later than 2045.

You can view each petition signer and the comments they left you in the attached PDF.

Thank you,

Christopher Tull



Sent via Action Network, a free online toolset anyone can use to organize. [Click here to sign up](#) and get started building an email list and creating online actions today.

Action Network is an open platform that empowers individuals and groups to organize for progressive causes. We encourage responsible activism, and do not support using the platform to take unlawful or other improper action. We do not control or endorse the conduct of users and make no representations of any kind about them.

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4. Parking programs should be included in ways that reduce single-occupancy car trips.

Public Facilities, Services, and Infrastructure:

1. Enroll residents in a program to reduce CO2 emissions in their neighborhoods. Ex: Cool Block or Transition Streets.
2. PFS 2.1 must be revised to say include rather than encourage 'Sustainable Plans and Operations' in order to be considered a mitigation of climate change impacts from greenhouse gas emissions.
3. Policy PFS 7.1 should be revised to delete the need for access to gas. The environmental impact from use of natural gas requires carbonizing buildings beginning with no gas connections to new residences . It is therefore contradictory to ensure access to gas.
4. Local renewable energy generation must be part of the mitigation plan for reducing transmission facility fire hazard risk. This is not the same as "Smart Grid Technology". You need experts who know the cutting edge of this field to help write coherent policy on this topic.
5. Zero Waste The County shall achieve zero waste (via a suite of policies to reduce, reuse, and recycle) with no organic waste going to landfills by 2023
6. Zero Waste Policy for Meetings and Events Design and implement a zero waste policy for meetings and events sponsored or permitted by the County to minimize waste and rescue surplus edible food
7. Compostable Take-Out Foodware Require that take-out foodware be made with material compostable in solid waste processing facilities within 60 days
8. Reduce Solid Waste by Phasing Out Single-Use Plastic Evaluate how to best reduce solid waste generation per capita by at least 15% by 2030 including phasing out single-use plastics including but not limited to plastic straws, plastic utensils, plastic take-out containers, and expanded polystyrene
9. Ban Expanded Polystyrene

Conservation and Open Space:

1. Reduce oil and gas production by 40% by 2025 via higher monitoring standards and 2500 ft buffer zones near sensitive sites; reduce production to zero by no later than 2040.
2. Phase-Out of Oil and Gas Production The County shall prohibit new drilling and shall regulate existing wells to assure steady closing of wells beginning near residential and commercial areas.
3. Maintain Policy COS-7.8 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to collect gases and use or remove them for sale or proper disposal instead of flaring or venting. Flaring should be allowed only in cases of emergency or for testing purposes.
4. Maintain Policy COS-7.7 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to convey oil and produced water via pipelines instead of trucking.
5. Detect and curb methane emissions from "super-emitter" sites as identified by NASA.
6. Tax oil and gas production, and related uncaptured methane to raise the needed revenues to fund urgent climate programs to replace high-emission vehicles with a priority on trucking and freight companies, fishing businesses, general contractors and K-12 schools.
7. Require a fully accountable performance bond for all new wells to cover cost of closure Cite

LAT article (maybe put on website and link to it).

8. Establish an insurance fund that oil and gas producers contribute to that will cover accidents and closing wells if the producer goes bankrupt.
9. Ban gas-fueled lawn and garden equipment. (Ex: City of Ojai)
10. Accelerate capture of legacy HFCs Enlist the public and private to find and destroy existing stocks of HFC's (refrigerant gases with extremely high Global Warming Potential).
11. Develop and adopt building codes based on best practices for use of low embodied carbon concrete and set targets for use of low GHG concrete alternatives. Ex: Bay Area Air Quality Management District and King Co, WA.
12. Encourage climate-safe and climate-resilient development through zoning reform and removal of limits on height, density, and minimum parking requirements to enable and promote walkability and a mix of uses for homes and businesses, parks and transit.
13. Create a master local clean energy siting and funding plan for wholesale distributed solar energy plus storage in commercial scale projects producing energy needs by 2030.
14. Provide energy efficiency benchmarking and rebates for low-income housing and renters as well as low-interest loans for small businesses to reduce energy use; assist owners of existing buildings to switch from natural gas to electricity.
15. Prepare sustainable building, siting, landscaping and passive heating and cooling practice guidelines, with a priority on low-income housing, that reduce consumption of non-renewable resources and that include climate and fire-safety in pre-approved plans.
16. Energy Efficiency to Reduce Electricity Use Use Energy Efficiency to Deliver 15% of Projected Needs for electricity in the county by 2023; and 30% by 2030.
17. Efficiency Building Standards for Retrofits Prioritize energy and water efficiency building standards and work to retrofit existing buildings.
18. Decarbonize County Buildings Develop a county building electrification plan eliminating natural gas use in County-owned facilities.
19. Decarbonize All Building Types Develop an electrification plan with goals for GHG emission reductions through renewable energy that evaluates and prioritizes programs for local solar, energy storage and demand response (DR) that disconnects all buildings from gas service by 2050. Include incentives for deep retrofits of inefficient buildings.

Agriculture:

1. Integrated Pest Management where toxic pesticides are a last resort. Create a program that promotes the principles (systems approach, building trust, and effective communication) and pursues the recommendations of the Roadmap for Integrated Pest Management from the University of California and CA Department of Pesticide Regulation. Environmental impacts from toxic pesticides are not described in the Background Report. The Roadmap to an Organic California Policy Report by CCOF Foundation offers information for mitigations and climate action. A workshop is needed.
2. Inorganic Nitrogen Based Fertilizers Set benchmarks for reducing use of inorganic N fertilizer and encourage optimized use of organic and inorganic fertilizer for greatest efficiency in closed nutrient cycles, monitor for nutrient runoff from fields and encourage the use of cover crops and green manure crops to reduce or avoid nitrous oxide (N₂O) emissions and nutrient runoff.
3. Diversified Cropping Systems Encourage farmers to include 1 – 5% of beneficial insect attracting plants in a planted crop, and other methods, such as crop rotation, perennial mowed cover crop in orchards, and integrating multiple species or varieties to enhance the biological and economic stability by spreading economic risk and buffering against pest invasions and extreme weather events, and increase carbon sequestration.
4. Reward Regenerative Farmers with Digestate and Compost from Food Waste Research feasibility of a program for composting food waste for use by farmers and landscapers who use regenerative practices that sequester certified amounts of CO₂.

Water Resources:

1. At least 30,000 acre-feet per year must come from storm water capture by 2035
2. All rainfall must be retained onsite in soil and reservoirs.
3. Slow It. Spread It. Sink It! The County shall enforce Best Management Practices (BMP) and Low Impact Development (LID) for new developments.
4. Recycle all wastewater for beneficial reuse by 2035.
5. Reduce potable water use per capita by 22% by 2025 and 25% by 2035: Offer incentives for water conservation features, including drought tolerant landscaping, permeable materials in standard parkway design guidelines, street trees, infiltration, greywater, and water-saving plumbing.
6. Close oil and gas wells and injection wells near aquifers as a top priority.
7. Create a Master Plan to develop the full potential of integrated water management to infiltrate the ground and recharge aquifers; support reforestation and restoration of watershed ecosystems; conserve and protect groundwater resources, and clean up creeks, streams, and estuaries.
8. Support Santa Clara River Loop Trail and Ventura River Trail Development

Economic Vitality:

1. Agricultural Diversification should include reference to regenerative practices to create biodiversity with opportunities for community members to visit farms.
2. Small Business Promotion. Support approval of caretaker residential space on business property to reduce VMT and more financial strength for small businesses.
3. Green Economy. Prioritize youth and immigrants for workforce development in industries that promote and enhance environmental sustainability, including GHG reductions, climate adaptation, resiliency and local renewable energy generation, storage and distribution, including solar power, wind power, wave energy, regenerative organic farming and value-added agriculture-related activities, and other appropriate renewable sources.
4. Maritime Economy. Facilitate a sustainable maritime economy using restorative aquaculture techniques that restore ocean health and biodiversity while reviving pre-human fisheries abundance. For example, restore sand-bottom kelp forests and increase kelp forests with flexible floating fishing reefs where the seafloor is otherwise too deep for kelp.
5. Promote Fire-Resistant Infill and Revitalization. Encourage infill development that serves as firebreak rather than as additional fuel for wildfires.
6. Create a Collaborative Structure for Innovation for a Resilient Future. The structure should be able to make decisions and create a way forward for zoning, building and materials and environmental health to allow options for a resilient future, include government officials, innovators and public as described in submissions from Sustainable Living Research Initiative.
7. Parking Infrastructure. Develop parking policies to reduce single occupancy trips associated with employees and business activity to reduce Vehicle Miles Traveled.
8. Master Plan for Distributed Energy Resources and Community Microgrids. Prepare a map of siting options for renewable energy generation and storage facilities and coordinate the identification of financing options for renewable energy resource development, including solar, wind, wave, storage and community microgrids both in front of and behind the meter.

In summary, with the accelerating tipping points, we cannot go half-way in our vision. We need extraordinary courage to set goals we can hang our hopes and efforts on. We want completeness and clarity so we can see how the emissions reduction plan adds up. We want respect for climate science to tell us the truth. We want more ambition. A 2016 decision of the state legislature in SB32 is just not good enough as a goal. We want to see a systematic plan that will assure carbon neutrality no later than 2045.

You can view each petition signer and the comments they left you below.

Thank you,

Christopher Tull

1. Andrew Abate (ZIP code: 93001)

2. Adam Kaiserman (ZIP code: 93001)

3. Allen Pobirs (ZIP code: 93004)

4. Ally Gialketsis (ZIP code: 93003)

5. Noah Aist (ZIP code: 93004)

6. Alexander Verharen (ZIP code: 93001)

7. Allison Maires (ZIP code: 93003)

Climate Change needs to be our county's top priority, we are in jeopardy. Please have it figure prominently in the General Plan.

8. Emiliano Amaro (ZIP code: 93036)

9. Alli Fish (ZIP code: 93001)

10. Andrew Ellison (ZIP code: 93023)

11. Angela Romero (ZIP code: 93003)

12. Annette Halpern (ZIP code: 93004)

13. Arnett Smithson (ZIP code: 93004)

14. Ellen Smith (ZIP code: 93010)

I support this petition!

15. Rebecka Hutchins (ZIP code: 92701)

Dear Ventura County Supervisors,

Global warming is happening right now we would like for you to consider our climate solutions, so we can live and breathe in a healthier and cleaner environment.

Sincerely,

Rebecka

16. Barbara Leighton (*ZIP code: 91320*)

17. Ben Werner (*ZIP code: 93101*)

18. elizabeth shipley (*ZIP code: 93041*)

19. Bryan Farin (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Bryan

20. Luis Campa (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Luis

21. Jeannette Welling (*ZIP code: 91362*)

22. brian rasnow (*ZIP code: 91320*)

We need to follow the science and not discount the future for short term, unsustainable, rewards.

23. Brigid Morales (*ZIP code: 93003*)

24. Cesar Vega (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Global warming is happening right now we would like for you to consider our climate solutions, so we can live and breathe in a healthier and cleaner environment.

Sincerely,

Cesar

25. Candie Lange (*ZIP code: 93022*)

26. Carol Hart (*ZIP code: 93001*)

27. Catherine Forbes (*ZIP code: 92374*)

28. Charles Myers (*ZIP code: 93022*)

29. Anthony Krzywicki (*ZIP code: 93001*)

30. Chelsea Sutula (*ZIP code: 93023*)

we need to do better

31. Christina Pasetta (*ZIP code: 90405*)

-CARBON NEUTRAL 2028

-INDEPENDENT EIR

-ACCEPT AND SUPPORT CFROG AND SURFRIDER POLICY RECOMMENDATIONS

32. Charmaine Feria (*ZIP code: 9303e*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Charmaine

33. Christine Johnston (*ZIP code: 93015*)

34. Claire Williams (*ZIP code: 91301*)

35. Christopher Tull (*ZIP code: 93036*)

36. Denice Avila (*ZIP code: 93012*)

37. Craig Juan (*ZIP code: 92128*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely

38. David Gilbertson (*ZIP code: 93012*)

The VC General Plan must identify specific actions to address the impacts of our Climate Crisis. The current draft General Plan lacks specific measurable actions to reduce GHG emissions.

I support this petition and its recommendations.

39. Dee Reid (*ZIP code: 93023*)

40. Cheryl Dilks (*ZIP code: 93035*)

41. Daniel Jordan, PhD (*ZIP code: 93035*)

42. DANIEL TWEDT (*ZIP code: 91360*)

As a CERT-trained Extra Class Amateur Radio Operator, (KK6VDR) I believe we can recruit Ventura County's Hams into finding various Citizen Science Initiatives to assist with the regenerative steps we need to save our shared biosphere.

43. Douglas Johannes (*ZIP code: 93004*)

44. Dulce Satterfield (*ZIP code: 93041*)

45. Doug DuBois (*ZIP code: 93001*)

46. liz lamar (*ZIP code: 93033*)

47. Elisha Borcena (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on our global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Elisha

48. Elizabeth Rice (*ZIP code: 93010*)

49. Elizabeth Billiot (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Elizabeth

50. Erica Ramirez (*ZIP code: 93003*)

51. Pat Browne (*ZIP code: 93012*)

52. Emma Aist (*ZIP code: 93004*)

53. Amber Bassett (*ZIP code: 93003*)

It is absolutely crucial that all efforts to create carbon neutral communities happens before 2045. Our climate in particular is affected by this.

54. Erlinda Farala (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on our global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Erlinda

55. Erlinda Farala (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about climate change and it's effects on global warming.

Thank you,

Erlinda

56. Faith Grant (*ZIP code: 91361*)

We need to have strong climate policies in Ventura. It's going to take major changes to even slow down climate change. Please listen to the electorate and endorse strong climate policies.

57. Jennifer Farin (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Jennifer

58. Fiona Bremner (*ZIP code: 93003*)

59. Judith Wilson (*ZIP code: 93003*)

60. Gabriel Sandosham (ZIP code: 95112)

61. Gael Belden (ZIP code: 93023)

62. Geoffrey Dann (ZIP code: 93003)

The county must plan to mitigate the effects of climate change and help slow or reverse climate change. We should set an example for the rest of the country.

63. Gordon Clint (ZIP code: 91320)

64. gail hubbs (ZIP code: 91320)

65. George Vye (ZIP code: 93004)

66. Ashley Basquez (ZIP code: 93012)

Dear Ventura County Supervisors,
Please take care of our Climate Change Challenges for our future children and their children's children. Our land is so precious. We are the 5th richest county in Southern California and can make a positive impact.

Sincerely,
Ash

67. grant marcus (ZIP code: 93001)

68. Gene Fox (ZIP code: 93004)

69. Gwen Bell (ZIP code: 93023)

70. Helen Dziadulewicz (ZIP code: 93010)

71. Leicy Grace (ZIP code: 93033)

Dear Ventura County Supervisors,

Please care about climate change and it's effects on global warming.

Thank you,

Leicy

72. Michelle Cabrera (ZIP code: 93001)

73. Jack Weber (ZIP code: 93023)

Climate policy must be a priority; cease all fossil fuels and witch to renewables and make biking more safe! Thank you...

74. Jackson Piper (ZIP code: 91320)

This general plan will shape how development occurs in Ventura County in the near future and will affect the lives of County residents beyond the timeframe of the plan. It is essential that the plan acknowledges and does everything possible to prepare Ventura County and its residents for the dangers that we face due to climate change - whether or not some of our fellow residents wish to acknowledge that danger or our agency as a society in working to minimize its impact. Please improve upon the Draft General Plan by incorporating the suggestions of the Climate Hub into the final document, so that Ventura County and its residents can more effectively protect this place that is special to all of us.

75. Judy Duerr (ZIP code: 93004-1228)

76. Jaira Farala (ZIP code: 93030)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Jaira

77. James Brehm (ZIP code: 93001)

78. Janet Sager Knott (ZIP code: 93023)

79. Jan Dietrick (ZIP code: 93001)

80. Jeff Otterbein (ZIP code: 93023)

81. Jennaci Feria (ZIP code: 93030)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Jennaci

82. Jenny Pandol (ZIP code: 93001)

83. Jamee Faral (ZIP code: 93030)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Jamee

84. Jonathan Farin (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Jonathan

85. Jeff Farin (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Jeff

86. James Merrill (*ZIP code: 93033-7965*)

87. James Whitney (*ZIP code: 93001-1491*)

We need to act now, the climate will not take a time out for us to mull it over.

88. Joyce McIntire (*ZIP code: 91320*)

89. Jimmy Vasquez (*ZIP code: 93003*)

90. Karen Trowbridge (*ZIP code: 93035*)

We need to do everything possible to divert the impact of climate change or rather climate crisis here in Ventura County? We must act now!!!!

91. Joan Nygren (*ZIP code: 93023*)

We all need to take this seriously

92. Joe Connett (*ZIP code: 93001*)

Addressing climate change must be a priority!

93. John Brooks (*ZIP code: 93022*)

The climate action plan must be clear, drastic and enforceable.

94. Jon Wilk (*ZIP code: 93023*)

95. Jennie Altice (*ZIP code: 92128*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Jennie

96. Josie Sabalerio (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Josie

97. Karen Farin (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Karen

98. Karen Farin (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Karen

99. Karen Sher (*ZIP code: 93012*)

100. Karina Kaye (*ZIP code: 93035*)

101. Kate Higgins (*ZIP code: 93004*)

Vote Kim Stephenson for Cty Supervisor, District 3

102. Kathleen Wheeler (*ZIP code: 93003*)

103. Kaysha Farala (ZIP code: 93033)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on our global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Kaysha

104. Keith Nieves (ZIP code: 93001)

105. Kristen Kessler (ZIP code: 93004)

106. Katharine Merrill (ZIP code: 93033-7965)

We need to create a climate plan that is grounded in good science, and that means counting all the green house gas emissions from all sources.

107. Katherine Mack (ZIP code: 03023)

108. Kathleen Nolan (ZIP code: 93023)

109. Layla White (ZIP code: 93030)

Dear Ventura County Supervisors,

Please consider taking care of our climate and reducing the effects of global warming.

Sincerely,

Layla

110. Krystal Anderson (ZIP code: 92071)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Krystal

111. Diana Kubilos (ZIP code: 93004)

112. Kevin Ward (ZIP code: 93036)

The time is now for transitioning to non-fossil fuel products, all of them.

Solar, permaculture and voting for Bernie is a good defense against global warming already evident in fires, floods and, like Coronavirus, microbes. Any delay will make the US complicit with chosen

extinction. Think Green New Deal or nada.

113. Kristofer Young (ZIP code: 93023)

The climate portions of the general plan lacks specific, critical goals and mechanisms to ensure achieving them. We do not have time to waste.

114. Kyle Pobirs (ZIP code: 93004)

115. Lauren Mendez (ZIP code: 93030)

116. Lorren Carter (ZIP code: 92064)

Dear Ventura County Supervisors,

Global warming is happening right now we would like for you to consider our climate solutions, so we can live and breathe in a healthier and cleaner environment.

Sincerely,

Starsha

117. LeeAnne Christensen (ZIP code: 93021)

118. Leopoldo Lopez (ZIP code: 93003)

119. Leslie Purcell (ZIP code: 93001)

120. Yusef Kilea (ZIP code: 93035)

121. Liz Campos (ZIP code: 93002)

122. Sio Arden (ZIP code: 9303p)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Sio

123. Willard Lubka (ZIP code: 91362)

124. Lupe Anguiano (ZIP code: 93033-3449)

I continue expressing strong support for the recommendations made by CFROG and Climate Hub to the Ventura Country's 2040 DraftvGeneral Plan and EIR.

125. Madalitso Kalinde (ZIP code: 2461)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Madalitso

126. Mary Ann Krause (ZIP code: 93060)

127. Mary Nelson (ZIP code: 93036)
It is way past time to take action. Step up!

128. Maria Ornelas (ZIP code: 91320)

129. Marlena Roberts (ZIP code: 93041)

130. Marlene Breitenbach (ZIP code: 93035)

131. Martha Wolter (ZIP code: 93001)

132. Martha Fellows (ZIP code: 93023)

133. Martha Martinez-Bravo (ZIP code: 93012)

134. Meridel Carson (ZIP code: 93041)

135. Merrill Berge (ZIP code: 93010)

Since the General Plan process began we have seen horrific wildfires, sea level rise reports and been designated the warmest county in the lower 48. The next 20 years will only increase the impacts of climate change...Ventura County's General Plan must address this new reality with measurable, actionable policies that reduce our carbon emissions right here and right now.

136. Michele Burns (ZIP code: 93004)

137. Michelle Ellison (ZIP code: 93023)

138. Mina Nichols (ZIP code: 93036)

The good news is: if we admit that humans influence the weather, it's just a matter of time before we control the weather.

139. Mary Stanistreet (ZIP code: 93003)

140. Kari Aist (ZIP code: 93004)

141. Monica Gray (ZIP code: 93001)

142. Steven Nash (ZIP code: 93036)

Climate change must have primacy above all other significant impacts.

143. Dee Kiana Laborte (ZIP code: 93010)

144. Tim Nafziger (ZIP code: 93022)

Ventura County needs a robust climate component of our new general plan.

145. Nancy Merrick (ZIP code: 93003-242-)

146. norma gochin (ZIP code: 91362)

We need to address climate change, and we need to address it now. Our planet will not survive if we don't make plans immediately.

147. Nicolette Walker-Itza (ZIP code: 93023-2230)

148. Jaclyn Fillingame (ZIP code: 93060)

149. Nancy Tamarin (ZIP code: 91362-3212)

150. Denise Coin (ZIP code: 93001)

151. Karissa Sandoval (ZIP code: 93010)

152. Vickie Peters (ZIP code: 93023)

153. Olivia Lopez (ZIP code: 93030)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Olivia

154. Celia Ortenberg (ZIP code: 93030)

155. Pamela Lopez (ZIP code: 91362)

156. Pam Shellenbarger (ZIP code: 93001)

157. Paul Aist (ZIP code: 93004)

158. Margaret (Peg) Strobel (*ZIP code: 93003*)

The General Plan must take into account rapid, serious changes--drought and wildfires being the most obvious--from climate change. Since agriculture is a critical part of our economy, attention must be paid to that industry. Also important will be funding a way to seriously reduce oil and gas production, since it contributes to climate change. Plans to train workers to transition to new economic opportunities from climate-friendly industries must be planned. New and existing housing needs to be considered (weatherization to reduce electrical use from air conditioning). Climate change will impact everything that county government does.

159. Phil McGrath (*ZIP code: 93010*)

160. Rachelle Feria (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please consider the impact of global warming effecting our climate and the area we live in. Please consider our effective climate solutions that would benefit our humanity and biodiversity.

Sincerely,

Rachelle

161. Randall Edwards (*ZIP code: 91362*)

162. Ray Powers (*ZIP code: 93023*)

A thorough analysis and comprehensive climate action needs to be part of the general plan update. What's is currently being proposed is not sufficient.

163. Ricardo Lopez (*ZIP code: 93030*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Ricardo

164. Robert Dodge (*ZIP code: 93023*)

Climate change and its effects are one of our greatest existential threats and we must move away from a carbon based extractive economy as soon as possible. We urge you on behalf of the health and wellbeing of Ventura County and all of our citizens to adopt the strongest possible environmental protection in the Draft General Plan.

165. Ron Whitehurst (*ZIP code: 93001*)

We need to move to regenerative organic farming and landscaping to re-establish the small water cycles.

166. Ron Merkord (*ZIP code: 93015*)

Rising CO2 levels will soon have consequences for everyone, and Ventura County will see the first of

some of these effects, like increased wildfires and rising sea levels. We need to quit waiting for someone else to do something about it. Our own General Plan update is a great place to start.

167. Rominck Callo (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please consider taking care of our climate and reducing the effects of global warming.

Sincerely,

Romnick

168. rosemary fields (*ZIP code: 93004*)

Climate change affects the entire world all animals and humans.

169. Siomara Ardon (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Siomara

170. Scott eckersley (*ZIP code: 93023*)

171. Karen Karayan (*ZIP code: 93060*)

This is one of my top concerns! I worry about our children and their children's world if we don't do as much as we can to protect and heal our world! Ventura County can be one of the leaders in this effort!

172. Sarah Fleury (*ZIP code: 93060*)

173. Sasha Phan (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please consider taking care of our climate and reducing the effects of global warming.

Sincerely,

Sasha

174. Sonia Kroth (*ZIP code: 93001*)

175. Sharon Ray (*ZIP code: 93105*)

176. Starsha Farala (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about the effects of climate change as it is currently happening. Please strongly do something about the impact towards global warming in our environment.

Sincerely,

Starsha Farala

177. steve nipper (*ZIP code: 93023*)

Because it's the right thing to do!

178. Steve Pinsky (*ZIP code: 93001*)

179. Kristin Storey (*ZIP code: 93023*)

180. Susan Williamson (*ZIP code: 93023*)

Get with you guys! Ventura is a coastal city! Duhhh. You need to host a climate convention to get input on what needs to be done in VC!

181. Susan Curtis (*ZIP code: 91361*)

182. Francesa Gonzales (*ZIP code: 93033*)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on our global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Francesa

183. Arthur Snyder (*ZIP code: 93036*)

Global warming is an existential threat.

184. Paul Burke (*ZIP code: 93012*)

185. Tessa Salzman (*ZIP code: 93001*)

186. Tina Frugoli (*ZIP code: 91362*)

187. Catherine Myers (*ZIP code: 93004*)

188. theresa hartigan (*ZIP code: ?93022*)

189. thomas miller (*ZIP code: 93004*)

190. Thomas Seigner (ZIP code: 91361)

Each new climate study outlines a more dire situation than the previous study. Even if we went carbon neutral today, future generations will still experience hardships we have not. NO MORE NEW FOSSIL FUEL PRODUCTION IN VENTURA COUNTY.

191. Tamara Hoyt (ZIP code: 93001)

Please address the climate crisis now

192. Todd Shuman (ZIP code: 93010)

I endorse this petition! It is time that Ventura County increase its commitment to reduce GHG emissions ...

193. Christine Samusick (ZIP code: 93001)

We need a desalination plant. Yesterday.

Water recycling must be encouraged and accommodated.

All styrofoam must be banned.

This is a partial list of actions that will help Ventura through this continual drought and help ease the burden on our landfill.

194. Vicki DeBear (ZIP code: 91311)

195. Vilma Pineda (ZIP code: 93033)

Dear Ventura County Supervisors,

Please care about the effects of climate change and its negative impact towards global warming.

Sincerely,

Vilma

196. Lori Bates (ZIP code: 93035)

197. Margot Davis (ZIP code: 93001)

The planning commission, or whoever it was that drafted the DEIR , I don't understand how they could have so missed the boat? I hope the board of supervisors will not miss the boat entirely and OK this general plan update the way it stands

198. Wilson Altice (ZIP code: 92128)

Dear Ventura County Supervisors,

Please care about the effects of climate change and the negative impact it has been making on global warming. Please consider our effective solutions to benefit our humanity and biodiversity.

Sincerely,

Wilson

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Diane Diedrich
c/o Hoffman, Vance & Worthington
1000 S. Seaward Avenue
Ventura, CA 93001

February 24, 2020

Ventura County Board of Supervisors
Attn: RMA Planning Division
General Plan Update
800 Victoria Avenue L#1740
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

Sincerely,



Diane Diedrich



c/o Hoffman, Vance & Worthington
1000 S. Seaward Avenue
Ventura, CA 93001

February 24, 2020

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Attn: RMA Planning Division
General Plan Update
800 Victoria Avenue L#1740
Ventura, California 93009-1740

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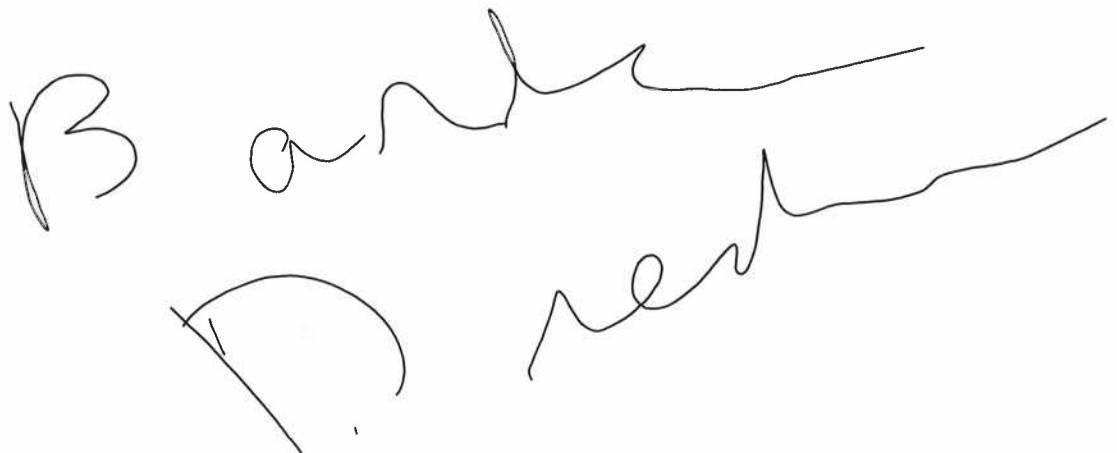
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Sincerely,

A handwritten signature in black ink, appearing to read "Brandon". The signature is written in a cursive, flowing style with a long horizontal line extending to the right.

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 3:36 PM
To: Simmons, Carrie
Subject: FW: Letter re General Plan Update
Attachments: Scan.pdf

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740
Visit the Planning Division website at vcrma.org/planning
Ventura County General Plan Update. Join the conversation at VC2040.org
For online permits and property information, visit [VC Citizen Access](#)



Pursuant to the California Public Records Act, email messages retained by the County may constitute public records subject to disclosure.

From: Duarte, Gabriel <G.Duarte@musicpeeler.com>
Sent: Thursday, February 27, 2020 3:35 PM
To: General Plan Update <GeneralPlanUpdate@ventura.org>; Curtis, Susan <Susan.Curtis@ventura.org>
Subject: Letter re General Plan Update

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

Please see letter attached on behalf of a concerned Ventura County resident.

Best,

Gabriel R. Duarte
Attorney

MusickPeeler

Musick, Peeler & Garrett LLP
2801 Townsgate Road Suite 200
Westlake Village, California 91361

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This e-mail is confidential and may contain attorney client or otherwise privileged or private information. Unless you are an intended or authorized recipient, you may not use, copy or disclose this message or any information contained herein. If you have received this message in error, please advise us by reply email to: administrator@musickpeeler.com and delete the message and any attachments. Thank you.

Gabriel R. Duarte
4014 Brindisi Place
Moorpark, CA 93021

February 27, 2020

Ventura County Board of Supervisors
Attn: Susan Curtis, Manager, General Plan Update Section
800 South Victoria Avenue, L#1740
Ventura, CA 93009-1740

I'm writing to you as a concerned resident of the County regarding the viability of the oil and gas industry in Ventura County.

The 2040 General Plan Draft EIR fails to give proper analysis to oil and gas mineral resources.

Neither the EIR nor the Background report provide a complete and thorough description of the existing, current regulatory setting that oversees the management and production of mineral resources in the County and the State of California. The EIR and the Background Report only disclose federal and state agencies that regulate pipelines and flaring, which is not applicable to all mineral resources that must be analyzed in an EIR under CEQA guidelines. The EIR should be revised to include an overview and description of all potential regulations, regulatory bodies, and programs that regulate mineral resources in Ventura County.

The EIR fails to actually analyze for direct and indirect impacts to mineral resource zones that will occur as a result of the 2040 General Plan. The County admits that Land Use Designation changes in the 2040 General Plan will result in changes to land uses OVER known and important mineral reserves. But neither the EIR nor the Background Report provide any information regarding estimated and anticipated "buildout" in terms of acreage, actual location, number of dwelling units, and development density and intensity. These incompatible land uses will significantly impact future mineral resource production and must be evaluated and mitigated for in the EIR.

The EIR never addresses indirect impacts to mineral resource development that will occur under the 2040 General Plan. As incompatible land uses (such as residential development) occur on or adjacent to mineral production and mineral reserves, compatibility conflicts will increase. Reasonably foreseeable indirect impacts include nuisance complaints, traffic conflicts, theft, vandalism and attempted trespass on mineral production sites. The EIR must analyze and evaluate these impacts on the ability to produce mineral resources in the County.

The Draft EIR is lacks critical analysis and must be corrected and recirculated to ensure a fair process for Ventura County residents.

Thank you,



Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 3:36 PM
To: Simmons, Carrie
Subject: FW: Ventura County General Plan Update EIR - SoCalGas Comments
Attachments: 20200227152300.pdf

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
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Ventura County General Plan Update. Join the conversation at VC2040.org
For online permits and property information, visit [VC Citizen Access](#)



Pursuant to the California Public Records Act, email messages retained by the County may constitute public records subject to disclosure.

From: Pezda, Jennifer <JPezda@socalgas.com>
Sent: Thursday, February 27, 2020 3:34 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: Ventura County General Plan Update EIR - SoCalGas Comments

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

Hi Susan,

Please find attached a PDF version of SoCalGas' comments on the Draft EIR for the County's General Plan Update.

Let me know if you have any questions or concerns.

Sincerely,
Jenny Pezda

Jenny Pezda, MESM | Environmental Policy Advisor | **SoCalGas**
Office: 213-244-4570
Cell: 213-321-8443





Deanna Haines
Director of Policy, Strategy and Environment

Southern California Gas Company
Strategy & Engagement
555 W. Fifth Street, GCT 21C5
Los Angeles, CA 90013

Tel: 213.244.3010
Mobile: 213.220-1121
DHaines@socalgas.com

Susan Curtis
Manager, General Plan Update Section
Ventura County Resource Management Agency, Planning Division
800 South Victoria Avenue, L #1740
Ventura, CA 93009-1740

RE: County of Ventura – Draft 2040 General Plan Update EIR

Dear Ms. Curtis,

Southern California Gas Company appreciates the opportunity to submit comments on the Draft 2040 General Plan EIR (“DEIR”) and believes the document will provide valuable direction for the County to pursue effective, long-term development goals, as well as enhance local sustainability objectives. In particular, we support proposed policies that encourage beneficial reuse of County-generated waste for energy generation. Such policies have great potential to help reduce County GHG emissions, especially from agriculture and human waste streams.

However, SoCalGas is concerned by one of the County’s proposed mitigation measures: MM GHG-1: New Implementation HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development:

Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development – To support the proposed reach codes under COS-S, the 2040 General Plan shall include a new program in the Hazards and Safety element that prohibits the installation of new natural gas infrastructure in new residential construction through amendments to the Ventura County Building Code. This program shall also be extended to include commercial building types such as offices, retail buildings, and hotels where the use of natural gas is not critical to business operations and contain appliances that can be feasibility substituted with electricity powered equivalents.” (pg. 4.8-45-46).

While we support the County’s attempt to reduce emissions associated with buildings, this mitigation measure is technology-restrictive, may actually increase emissions and will limit the County’s ability to explore other innovative approaches to achieve emissions reductions in the future without deleveraging residents and businesses to hedge themselves against climate risks such as wildfires and household rising energy costs.

This type of ban would contravene California state law and policy as it relates to the availability of natural gas as a resource for residents and to the provision of a reliable and resilient energy supply. In addition, such a ban raises concerns under federal law.

Further, the DEIR's analysis and treatment of MM GHG-1 is legally flawed under the California Environmental Quality Act ("CEQA"). First, the DEIR fails to consider, discuss or analyze the environmental effects of implementing MM GHG-1. Second, the County cannot rely on MM GHG-1 to mitigate GHG impacts caused by the 2040 General Plan because MM GHG-1 is "infeasible" under CEQA. Lastly, by finding that climate change impacts would remain significant and unavoidable even with implementation of MMs GHG-1 through GHG-3, the County has neglected to consider other GHG emission reduction strategies as potential mitigation in the DEIR.

1. The DEIR Fails to Analyze the Environmental Impacts Associated with MM GHG-1

CEQA Guidelines section 15126.4(a)(1)(D) provides that, if a mitigation measure would itself cause significant environmental impacts, those impacts must be discussed in the EIR.¹ Here, the DEIR discusses what MM GHG-1 would consist of (*i.e.*, implementation of programs to prohibit natural gas infrastructure in new residential development, otherwise known as "Reach Codes"), notes that MM GHG-1 would implement Policy COS-8.6, which "will encourage zero net carbon emissions building design, which was assumed for quantifying GHG reduction benefits of the program", and states that implementation of a Reach Code will be predicated on a "cost-effectiveness study" by the California Energy Commission ("CEC").² However, the DEIR fails to discuss the potential environmental effects from implementing a Reach Code that bans or restricts natural gas in residential and/or commercial buildings.

Substantial evidence indicates that adopting and implementing MM GHG-1 and Reach Codes could lead to the following significant environmental impacts under CEQA.

- ***Utilities and Service Systems*** – In the CEQA Guidelines Appendix G checklist,³ section "XIX. Utilities and Service Systems" asks whether proposed projects would "[r]equire or result in the relocation or construction of new or expanded water, wastewater treatment or storage drainage, *electric power*, ... facilities, the construction or relocation of which *could* cause significant environmental effects."

¹ 14 Cal Code Regs. § 15126.4(a)(1)(D); *see also Sacramento Old City Assn. v. City Council* (1991) 229 Cal.App.3d 1011, 1027; *Stevens v. City of Glendale* (1981) 125 Cal.App.3d 986; *Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 400 (mitigation measures employed to prevent downstream flooding associated with reservoir project may themselves have a significant environmental impact, but was not analyzed); *Gray v. Cty. of Madera* (2008) 167 Cal.App.4th 1099, 1118 (EIR did not address potentially significant impacts associated with water quality mitigation measures).

² DEIR at 4.8-47.

³ *See* Governor's Office of Planning and Research, Final Adopted Text of Revisions for CEQA Guidelines, http://resources.ca.gov/ceqa/docs/2018_CEQA_FINAL_TEXT_122818.pdf.

Adoption and implementation of a Reach Code would require new buildings to either be all-electric or, if mixed-fuel, likely subject to higher levels of energy efficiency than all-electric buildings. It is reasonably foreseeable that some developers will choose to develop buildings with all-electric energy, which will increase the demand for electricity; however, there is no analysis in the DEIR as to whether (i) the local grid has the generating resources and capacity to meet such increased demand for electricity, or (ii) whether the local public utility or load-serving entity has sufficient distribution or transmission assets to provide increased service in a safe and reliable manner.⁴ The DEIR fails to quantify increased electricity demand, how many additional generation, distribution or transmission assets may be needed to facilitate this increased demand, or how the construction or relocation of such assets could impact the environment.⁵

The need to substantially overbuild local power systems when natural gas is not used as a base load means that a much greater amount of land, habitat and related physical resources will be impacted by solar and wind generation facilities. In a scenario where natural gas is banned across the state, new solar arrays and wind farms will need to be fabricated, transported to, and installed throughout California at more than five times the historical rate of deployment every year for the next 25 years.⁶ This deployment will significantly impact the physical environment across California. The fabrication, transportation and construction of the required generation facilities will also generate GHG emissions that would have cumulative climate change impacts.

In addition, as more electric energy is utilized new transmission capacity must be fabricated, transported to and installed throughout the state to connect with thousands of miles of new nationwide transmission lines. Additional transmission facilities will have significant impacts to the physical environment and result in aesthetic and potentially cultural impacts. The fabrication, transportation, and construction of new transmission equipment and capacity will also generate GHG emissions.

Because renewable generation is intermittent, California will also be required to increase power storage capacity to unprecedented levels if natural gas is banned. Additionally, California would need to dramatically increase hydropower capacity by increasing the size of state reservoirs by as much as 100 times above current levels. Battery storage on this scale would have significant hazardous materials, human health,

⁴ See, e.g., Pub. Res. Code § 451 (“Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities, including telephone facilities, as defined in Section 54.1 of the Civil Code, as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.”).

⁵ Cf. *California Clean Energy Comm. v. City of Woodland* (2014) 225 Cal.App.4th 173, 208 (EIR for shopping center lacked required energy analysis despite stating, among other things, that existing facilities were sufficient to serve the project: “In addition, a substation, multiple utility lines (60 kV, 115 kV, and 230 kV), and gas transmission lines exist in the area to serve the buildout of the proposed project.”).

⁶ Clean Air Task Force, Comments On SB 100 Joint Agency Report - Charting a Path to a 100% Clean Energy Future, September 19, 2019, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=229800&DocumentContentId=61244> (CATF 2019).

fire, fire suppression, and policing services, GHG emissions, and physical impacts. The construction of new hydropower storage would similarly have significant air quality, aquatic plant, animal and habitat, land, GHG emissions, water and hydrology, public safety, and other impacts.

CEQA caselaw holds that EIRs must consider the effects of changes to the environment that can result from an expansion of facilities, services, or utilities to serve the project.⁷ Here, DEIR Chapter 4.17 does not cross-reference MM GHG-1 and fails to discuss how implementation of MM GHG-1 may lead to expanded facilities, services or utilities that would be necessary in the future when a Reach Code is adopted.

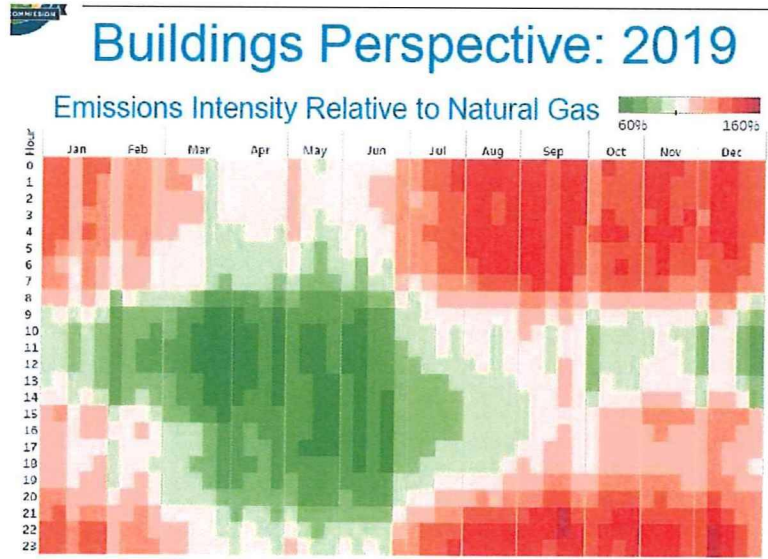
- **Greenhouse Gas (GHG) Impacts** – Implementation of a Reach Code under MM GHG-1 is predicated on the assumption that 100% electrified buildings are more energy-efficient and have a smaller carbon footprint than buildings with gas-powered appliances. Yet, multiple, independent studies demonstrate that such an assumption is not accurate.
 - In May 2019, the U.S. Department of Commerce, National Institute of Standards and Technology (“NIST”) published a study of the energy use, environmental impacts, and economic performance of residential buildings using either electricity or natural gas for space and domestic water heating. The analysis was based on a single-family home meeting all applicable building code requirements in Maryland. The NIST research concluded that a natural gas-heated home is more economical, results in “lower environmental impacts across numerous impact categories,” including lower GHG emissions, has a faster heating response time and generates a greater level of indoor comfort than an all-electric residence. In particular, GHG emissions were found to be higher because of the greater amount of fuels required to produce electricity for home use compared with the use of natural gas equipment in a residence.⁸
 - Although California has a larger proportion of renewable utility-scale energy than Maryland, consistent with the NIST study the CEC has also shown that, on average, natural gas generates substantially lower GHG emissions than electrical building use in California. As shown below, in 2018 the CEC estimated that electricity use in buildings produces a greater level of GHG emissions than natural gas about 60 percent of the year in California.⁹ Natural gas results in lower GHG emissions during a significant majority of all morning and evening hours in all months, the periods of highest residential energy demand. The significantly lower GHG emissions from natural gas use in California buildings

⁷ *Goleta Union Sch. Dist. v. Regents of Univ. of Cal.* (1995) 37 Cal.App.4th 1025; *El Dorado Union High Sch. Dist. v. City of Placerville* (1983) 144 Cal.App.3d 123.

⁸ E. O’Rear, D. Webb, J. Kneifel and C. O’Fallon. *Gas vs electric: Heating system fuel source implications on low-energy single-family dwelling sustainability performance*. Journal of Building Engineering. September 2019 issue. Full text available at https://tsapps.nist.gov/publication/get_pdf.cfm?pub_id=926046.

⁹ CEC, Building Decarbonization, 2018 Update – Integrated Energy Policy Report, Presentation by M. Brook at June 14 2018 IEPR Workshop at 16, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=223817>.

reflects the fact that, except during daytime hours from about March to June, intermittent solar and wind is insufficient to meet in-state building energy demand. When intermittent renewable energy is not available, electrical generation is less efficient and produces a greater level of GHG emissions than natural gas use in California buildings.



- Other researchers have also questioned whether requiring all electric buildings might, however unintentionally, result in higher GHG emissions. Household energy demand tends to peak in the morning and evening hours, when residents are preparing to leave for or returning from work, school or other activities and when intermittent renewable power, particularly solar, is unavailable. At these times, electric supplies must be produced from other sources, including natural gas-fired power plants. Converting fuels, such as natural gas, to electricity to meet home demands is less efficient than directly using natural gas. As a result, a Stanford University researcher has estimated that when renewable power is unavailable, such as during the evening hours, residential electricity consumption produces *three times* more GHG emissions than natural gas.¹⁰
- The County cannot assume that, over time, GHG emissions from electrical generation will be reduced during peak morning and evening periods when natural gas is currently a lower emission energy source in the state. Recent studies indicate that even if additional intermittent wind and solar generation capacity is deployed, gas-fired electrical facilities will almost certainly remain essential to stabilize the state's power grid. The gas-fired generators serving the state, however, may be forced to increasingly operate as short-term inefficient

¹⁰ See Anthony R. Kavscek, *Is a natural gas ban an 'antidote to climate change'?*, San Jose Mercury News (Nov. 12, 2019), https://mercurynews-ca.newsmemory.com/?publink=754c8d2e3_13411ac. Professor Kavscek is a member of the Energy Resources Engineering faculty at Stanford University.

“peaker plants” which are known to emit more GHG emissions.¹¹ Thus, it is far from clear that an all-electric building mandate will reduce GHG emissions.

The DEIR must disclose and acknowledge potential GHG impacts that could occur from shifting building energy use from natural gas to electric power given reasonably foreseeable conditions in which electrical energy consumption would produce more GHG emissions than natural gas building use.

- **Energy Impacts** – Under the CEQA Appendix G Checklist, a project may involve a significant environmental impact if it would result in “wasteful” or “inefficient” energy consumption. MM GHG-1 seeks to prohibit the installation of new natural gas infrastructure in new residential construction. But nowhere does the DEIR discuss how that may result in either (i) a failure to use already captured natural gas, or (ii) the expenditure of additional energy to transport or divert natural gas elsewhere. Studies have shown that low carbon natural gas may continue to be a viable resource in assisting the state with reaching its climate goals, and should continue to be utilized in typically hard to electrify thermal applications in residential, commercial and industrial uses.¹² Specifically, Renewable Natural Gas (“RNG”), or biomethane, can be produced from biomass wastes (e.g. forest, agriculture, waste water and food and green waste) and then processed to inject into existing pipelines. Because its production removes more potent greenhouse gas from the air (methane) compared to what is produced when used (carbon dioxide), RNG production can be carbon negative from a lifecycle perspective. The County cannot determine whether full electrification policies will have unintended consequences of “wasteful” or “inefficient” energy use, without first analyzing these impacts in the DEIR.
- **Public Health and Safety** – In an era of increasingly dry and warm climates, and increased population in the wildfire urban interface along with build out of electrical infrastructure that could be an ignition source to serve population growth, California wildfires are occurring at increased frequencies and severities. Each of the three California investor-owned utilities adhere to wildfire mitigation plans (“WMP”) submitted to and approved by the California Public Utilities Commission (“CPUC”) — which establish internal mechanisms and protocols for de-energization events, also known as Public Service Power Shutoffs (“PSPS”). PG&E’s most recent PSPS event (occurring on October 6, 2019) impacted over 728,980 customers in 35 counties across the Sacramento Valley, Sierra Foothills, North Bay, South Bay, East Bay, Central Coast,

¹¹ See, e.g., Mark Thurber, *Gas-fired generation in a high-renewables world*, Stanford University School of Earth, Energy & Environmental Sciences and Precourt Institute for Energy Natural Gas Initiative, NGI Research Brief (June 2018), https://ngi.stanford.edu/sites/g/files/sbiybj14406/f/NGI_Brief_2018-06_R3_Thurber.pdf.

¹² Energy + Environmental Economics, *Decarbonizing Pipeline Gas to Help Meet California’s 2050 Greenhouse Gas Reduction Goal* (Jan. 2005), https://www.ethree.com/wp-content/uploads/2017/02/E3_Decarbonizing_Pipeline_01-27-2015.pdf.

and parts of Southern California.¹³ Southern California Edison (“SCE”)— the investor-owned utility whose service territory includes the County — is likewise obligated to implement PSPS protocols in certain circumstances giving risk to wildfires and has done so on numerous occasions in 2019 and 2020. For example, on November 15-17, 2019, SCE instituted a PSPS event that was initially estimated to impact 31,975 customers on 48 circuits across four counties (including the County), although had a much smaller impact than originally considered.

It is evident that increasing the amount of power needed from the electrical grid, such as by reducing the use of natural gas and increasing the use of electricity, will only exacerbate these problems. Until that time, however, PSPS events will be the “new norm,” both in Northern and Southern California. In addition to the large-scale economic losses that customers suffer as a result of a PSPS event, public safety issues can also arise due to several factors. These include loss of power at critical medical facilities, added strain on first responder services (such as local police departments and EMTs), loss of school days, and disruption of critical city infrastructure during emergency responses (such as traffic lights). Although MM GHG-1 will contribute to an overloaded grid and exacerbate the economic and safety implications from future, likely PSPS events; the DEIR mentions none of these issues.

The County should consider how increased deployment of other technologies, such as microgrids and energy storage projects, can help achieve decarbonization and resiliency goals. A 2018 CEC report found that microgrid projects offer a number of “value propositions,” including renewable energy integration, grid resiliency, and carbon reductions.¹⁴ The CEC report concluded that microgrid projects align with the state’s Renewables Portfolio Standard and GHG reduction mandates.¹⁵ The County should analyze the effectiveness of these mitigation options instead of a ban on natural gas.

- ***Impacts on Biological Resources, Water Quality and Noise Stemming From Additional Renewable Generating Resources*** – As stated above, the County has not demonstrated how adopting and implementing MM GHG-1 will impact existing electricity demand. In other words, no evidence exists to support the notion that existing or future electricity load could meet energy demands if natural gas infrastructure is banned for all future residential construction. Rather, it is reasonably foreseeable that new renewable energy resources will be needed, in addition to those required under the California Renewables Portfolio Standard (“RPS”), to meet new building electrification policies. The CEC’s 2019 *California Energy Efficiency Action Plan Staff Report* acknowledges that statewide

¹³ PG&E, “Public Safety Power Shutoff (PSPS) Report to the CPUC Oct. 9-12, 2019 De-Energization Event” (Oct. 25, 2019), at https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/PSPS-Report-Letter-10.09.19.pdf.

¹⁴ Asmus, Peter, Adam Forni, and Laura Vogel. Navigant Consulting, Inc. 2017. *Microgrid Analysis and Case Study Report*. California Energy Commission. Publication Number: CEC-500-2018-022, <https://ww2.energy.ca.gov/2018publications/CEC-500-2018-022/CEC-500-2018-022.pdf>

¹⁵ *Id.* at ii.

building electrification efforts “will seek to increase the share of renewable generation on the electricity grid...”¹⁶

The DEIR does not analyze how development of foreseeable additional renewable generating resources will impact the environment. Because it is likely that the County can determine with particularity the amount of MW or MWh that will be needed to fully implement MM GHG-1 in years to come, an accompanying analysis of generating resources and their potential environmental impacts must be provided. These renewable resource facilities are known to have their own environmental impacts associated with construction and operation, including but not limited to, impacts on federal and California sensitive species, water quality and quantity, nearby noise receptors, and project-related air quality impacts.

Because such commercial-scale facilities might be located outside the County does not insulate the County from its obligation to consider the indirect environmental impacts from MM GHG-1. Indeed, “the purpose of CEQA would be undermined if the appropriate governmental agencies went forward without an awareness of the effects a project will have on areas outside of the boundaries of the project area.”¹⁷ It is well-settled that “the project area does not define the relevant environment for purposes of CEQA when a project's environmental effects will be felt outside the project area.”¹⁸

- **Environmental Justice** – “Environmental justice” is defined as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” Gov. Code § 65040.12(e). An Attorney General report defines “fairness” in this context to mean that “the benefits of a healthy environment should be available to everyone, and the burdens of pollution should not be focused on sensitive populations or on communities that already are experiencing its adverse effects.” “In addition, though CEQA’s main purpose is to evaluate whether a project may have a significant effect on the physical environment, “human beings are an integral part of the environment.”

The CEQA Guidelines state that “[e]conomic or social effects of a project may be used to determine the significance of physical changes caused by the project. For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant.” Here, MM GHG-1 would require the construction of new electric infrastructure, including within the County, to supply the electricity necessary to support a natural gas ban. This

¹⁶ California Energy Commission, *2019 Energy Efficiency Action Plan Draft Staff Report*, <https://efiling.energy.ca.gov/getdocument.aspx?tn=229496>.

¹⁷ *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 369.

¹⁸ *County Sanitation Dist. No. 2 of Los Angeles County v. County of Kern* (2005) 127 Cal.App.4th 1544, 1582–1583.

physical change to the environment will lead to cost increases for ratepayers, an economic impact which must be considered under CEQA.

Before the County can adopt MM GHG-1, the DEIR must consider the impact it will have on customer affordability and ratepayers. About 90 percent of residential energy consumers in Southern California use natural gas for space and water heating, and ratepayers prefer a choice in how they heat their homes and cook their food. Further, according to a 2018 study produced by Navigant Consulting on behalf of the California Building Industry Association, switching to all-electric appliances could cost single-family homeowners in Southern California “over \$7,200 and increase energy costs by up to \$388 per year.” Low-income customers would be the most burdened by the costs of building electrification.

Thus, as a result of adopting MM GHG-1, the County will have effectively established an unnecessary energy policy that will disproportionately impact its disadvantaged communities. Under CEQA, the County cannot gloss over this potential impact.

Given the substantial evidence that adopting and implementing MM GHG-1 will result in potential significant environmental impacts, the County is required to undertake proper CEQA review of such impacts, including both the direct and indirect environmental impacts stemming therefrom.

2. MM GHG-1 is Not “Feasible” under CEQA

Pursuant to CEQA Guidelines section 15126.4(a)(1), an EIR must “describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy.” “Feasible” means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.”¹⁹ Courts do not defer to an agency’s determination that mitigation measures will work when their efficacy is not apparent and there is no evidence in the record showing they will be effective.²⁰ Here, there is no evidence that MM GHG-1 is feasible as a means to mitigate GHG-related impacts associated with the 2040 General Plan. In fact, evidence demonstrates that natural gas bans are environmentally, economically and technologically infeasible.

Intermittent Renewable Generation Inhibits Feasibility of a Natural Gas Ban

Since 2015, several studies have evaluated the results of multiple assessments of national and California decarbonization strategies and options.²¹ Other studies have considered the power

¹⁹ CEQA Guidelines § 15364.

²⁰ See, e.g., *Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, 1168; *Communities for a Better Env’t v. City of Richmond* (2010) 184 Cal.App.4th 70, 95; *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1116-17.

²¹ See, e.g., P. Loftus et al., A critical review of global decarbonization scenarios: what do they tell us about feasibility?, WIREs Climate Change, January/February 2015, <https://www.researchgate.net/publication/267875650> A critical review of global decarbonization scenarios w

system and costs associated with relying solely on intermittent renewable power for decarbonization, in contrast with approaches that also utilize fossil fuels with CCS or renewable natural gas (“RNG”).²² These studies consistently conclude that renewable generation without a reliable baseload power source cannot achieve deep carbonization, will require installing massive amounts of additional generation and distribution facilities, and will be unaffordable.

- Relying on variable renewable sources such as wind, hydroelectric and solar to decarbonize will require the fabrication, installation and operation of approximately 3 to 10 times the level of solar and wind facilities that would be required if a reliable lower-carbon energy source was also utilized.²³ This overbuilding is required as intermittent power cannot achieve its nominal nameplate capacity—100 megawatts of solar or wind power will produce approximately 20-40 percent of capacity per year compared with approximately 90 percent capacity rates for natural gas. Thus, a much larger power system must be built to produce enough energy.
- As the percentage of intermittent renewable power serving a community increases, the amount of energy that is “curtailed” or wasted because it is not produced when needed can approach 40 percent of total generation.²⁴ Due to the timing mismatch between demand and the availability of solar and wind power, wind and solar would be unable to meet about 30 percent of California’s annual energy demand.²⁵ As a result, massive electrical power storage must be constructed, installed and operated

[hat do they tell us about feasibility A critical review of global decarbonization scenarios](#) (analysis of 17 decarbonization studies); J. Jenkins et al., Deep decarbonization of the electric power sector: insights from recent literature, Energy Innovation Reform Project, March 2017, <https://www.innovationreform.org/wp-content/uploads/2018/02/EIRP-Deep-Decarb-Lit-Review-Jenkins-Thernstrom-March-2017.pdf> (analysis of 30 decarbonization studies); S. Brick, Renewables and decarbonization: studies of California, Wisconsin and Germany, The Electricity Journal, 2016, https://www.researchgate.net/publication/299380869_Renewables_and_decarbonization_Studies_of_California_Wisconsin_and_Germany/fulltext/57dc15a408ae4e6f18469f9d/299380869_Renewables_and_decarbonization_Studies_of_California_Wisconsin_and_Germany.pdf?origin=publication_detail (analysis of California, Wisconsin and German studies); and J. Jenkins et al, Getting to zero-carbon emissions in the electric power sector, Joule, 2018, <https://www.sciencedirect.com/science/article/pii/S2542435118305622> (analysis of 40 studies).

²² See, e.g., N. Sepulveda et al, The role of firm low-carbon electricity resources in deep decarbonization of power generation, Joule, November 2018, <https://www.sciencedirect.com/science/article/pii/S2542435118303866?via%3DiHub> and B. Frew et al., Flexibility mechanisms and pathways to a highly renewable US electricity future, Energy, 2016, <https://web.stanford.edu/group/efmh/jacobson/Articles/Others/16-Frew-Energy.pdf>.

²³ See, e.g., P. Loftus et al., A critical review of global decarbonization scenarios: what do they tell us about feasibility?, WIREs Climate Change, January/February 2015, https://www.researchgate.net/publication/267875650_A_critical_review_of_global_decarbonization_scenarios_what_do_they_tell_us_about_feasibility? [A critical review of global decarbonization scenarios what do they tell us about feasibility A critical review of global decarbonization scenarios](#) and J. Jenkins et al., Deep decarbonization of the electric power sector insights from recent literature, Energy Innovation Reform Project, March 2017, <https://www.innovationreform.org/wp-content/uploads/2018/02/EIRP-Deep-Decarb-Lit-Review-Jenkins-Thernstrom-March-2017.pdf>.

²⁴ J. Jenkins et al, Getting to zero-carbon emissions in the electric power sector, Joule, 2018, <https://www.sciencedirect.com/science/article/pii/S2542435118305622> based on

²⁵ CATF 2019.

to capture a community's surplus intermittent power generation. In California alone, storing surplus generation would require batteries with an instantaneous capacity "larger than the generating capacity of the entire US electric grid." Even assuming battery storage costs fall dramatically to \$80 per megawatt, California communities would be required to pay about \$2.9 trillion to secure the necessary power storage.²⁶

- To increase the reliability of intermittent renewable energy, significant new large-scale transmission will be required to "knit together diverse wind, sun and hydro resources" including as much as "a twenty-fold increase in US transmission capacity and interties for very high renewable energy scenarios, according to the National Renewable Energy Laboratory."²⁷
- Due to the need for overbuilding, energy storage increases, and new transmission capacity, decarbonization using intermittent renewables without reliable low-carbon power sources would be unattainably expensive. The cost of electricity generation in California has been estimated to rise from about \$58 per megawatt hour with 60 percent renewable generation to \$389 using 80 percent renewable power, and an astonishing \$1,402 per megawatt hour at 100 percent renewable levels even assuming that the cost of wind, solar and storage falls substantially.²⁸ Other studies have estimated that California communities would pay more than \$1,600 per megawatt hour using 100 percent renewable power.²⁹

A Natural Gas Ban is Economically Infeasible for Customers

According to 2019 survey data published by the U.S. Energy Information Agency, the average household in California currently consumes about 7 megawatt hours of energy at a cost of approximately \$1,000 (\$0.14 per kilowatt hour). Published estimates indicate that California electrical generation costs could rise by 8 to 24 times current levels with 60 percent renewable power, higher utilization of renewables than at present. California households would also use more electrical power over time for transportation and other needs under a 100 percent renewable power scenario. Assuming that the average household electrical demand increases to 10 megawatt hours per year,³⁰ and that prices do not significantly increase until renewable use reaches 80 to 100 percent of total generation, the average California household electric bill

²⁶ CATF 2019.

²⁷ CATF 2019.

²⁸ CATF 2019.

²⁹ J. Temple, The \$2.5 trillion reason we can't rely on batteries to clean up the grid, MIT Technology Review, July 27, 2018, <https://www.technologyreview.com/s/611683/the-25-trillion-reason-we-cant-rely-on-batteries-to-clean-up-the-grid/>.

³⁰ EIA, *How much electricity does an American home use?* (Oct. 2, 2019), <https://www.eia.gov/tools/faqs/faq.php?id=97&t=3> (explaining that in 2018, the average annual electricity consumption for a U.S. residential utility customer was 10,972 kWh).

would increase to about \$8,000 per year at 80 percent renewable use, and to about \$24,000 per year with 100 percent renewable use.

Annual cost increases of this magnitude could be expected to stimulate significant population relocation to lower cost communities. Physical relocation, including the use of larger, high emission vehicles, could have significant impacts on air quality, population and housing. High household energy costs would also have significant health and safety impacts, including higher mortality and illness rates for vulnerable populations due to the inability to heat or cool homes. Direct relocation GHG emissions, and additional emissions that could occur from the movement of large amounts of households to lower cost communities with higher average household emission rates could also generate significant cumulative climate change impacts.

Higher electrical power costs could also result in the relocation, or failure to open and operate businesses in the state and the relocation of these activities to lower cost, higher-emission communities. As discussed in a January 2020 report by the California Legislative Analyst's Office, California communities already have disproportionately higher energy costs than most of the U.S. compared with marginal generation expenses. Consequently, higher costs associated with 100 percent renewable energy could generate significant GHG impacts.

3. The DEIR Finds that GHG Impact 4.8-1 Will Remain Significant and Unavoidable, but Does So Without Considering Other Feasible and Effective GHG Mitigation

Under CEQA, a lead agency may not adopt a project unless it has eliminated or substantially lessened all significant effects on the environment, or determined that remaining significant effects are acceptable due to overriding considerations.³¹ Here, the County concluded that, with the implementation of all identified GHG mitigation measures, Impact 4.8-1 would remain significant and unavoidable.³² However, the County cannot adopt this finding without implementation all feasible mitigation measures.³³ While it is true that "an EIR need not analyze 'every imaginable alternative or mitigation measure' ...," it "must respond to specific suggestions for mitigating a significant environmental impact unless the suggested mitigation is facially infeasible."³⁴

SoCalGas urges the County to consider other GHG emission-reduction strategies that are scalable and easier to implement, more resilient and more affordable. Specifically, the use of renewable gases such as hydrogen and renewable natural gas (RNG), are low carbon to negative fuels that can dramatically reduce county greenhouse gas emissions and provide optionality and flexibility for the energy system.

³¹ Pub. Res. Code. § 15092(b).

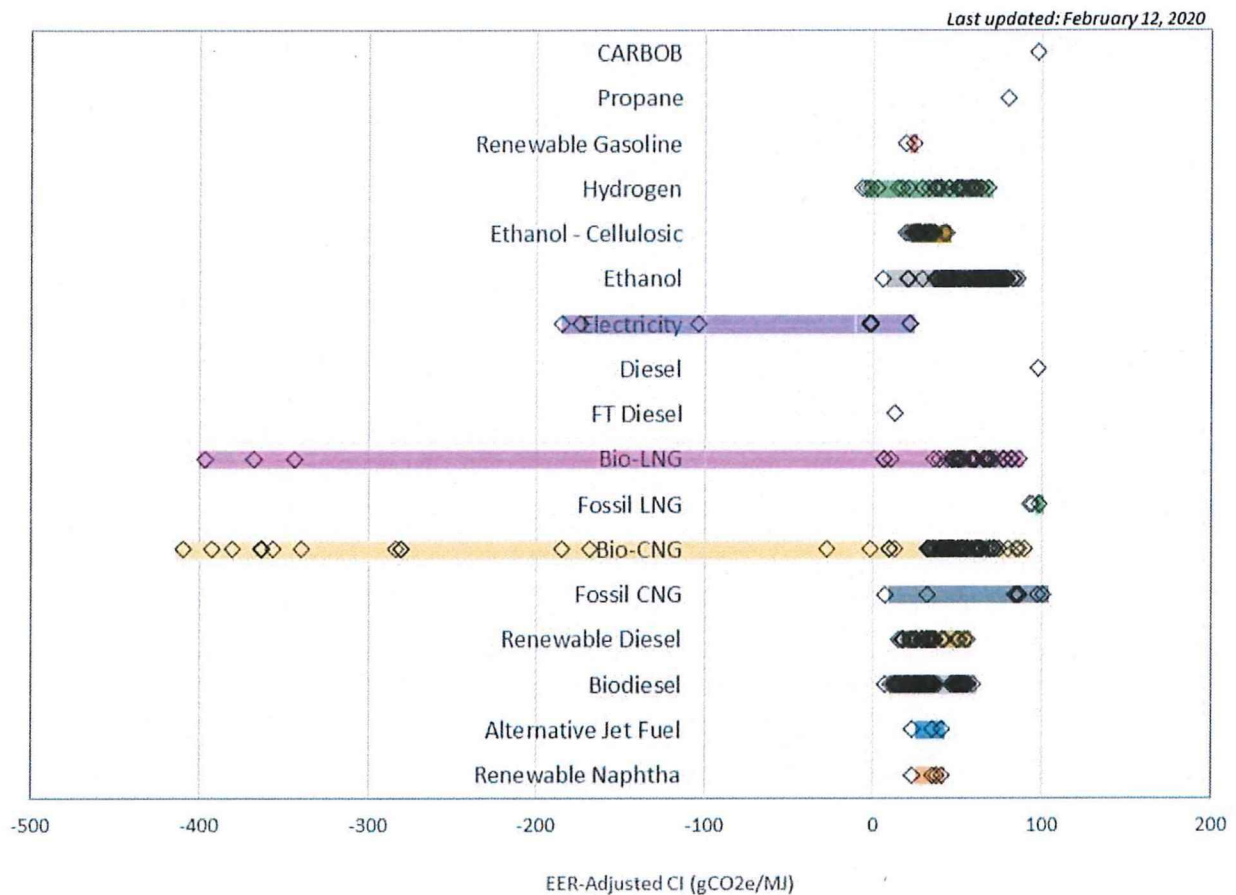
³² DEIR at 4.8-49.

³³ Guidelines §§ 15043(a), 15092(b).

³⁴ *Los Angeles Unified Sch. Dist. v. City of Los Angeles* (1997) 58 Cal. App. 4th 1019, 1029; citing *San Francisco Ecology Center v. City and County of San Francisco* (1975) 48 Cal.App.3d 584, 596 (EIR did not respond to School District's suggestion that air conditioning and filtering might prove feasible means of reducing air quality impacts under proposed plan).

As stated in our prior comment letter for the General Plan Update (attached), RNG, or biomethane, can be produced from a variety of waste resources (e.g. agricultural waste, forest biomass, waste water, and landfills) and then processed to meet pipeline specifications. Further, green hydrogen can be produced from excess solar and wind power generated when demand is low. The hydrogen can then be stored for later use in hydrogen fueling stations, be used for electric generation in fuel cells, and/or blended into the gas pipeline system to decarbonize gas supply which benefits all sectors. This technology, called Power-to-Gas, has been demonstrated in numerous pilot projects, including UC Irvine.³⁵

Carbon Intensity Values of Current Certified Pathways (2020)



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Renewable Gases Can Achieve Numerous Co-Benefits

Because most production of renewable natural gas removes methane from the air and converts it to carbon dioxide when used, RNG production can be significantly carbon negative from a

³⁵ UCI Samueli School of Engineering. UCI and SoCalGas Partner to Design “Advanced Energy Community.” December 2017. Available at: <https://engineering.uci.edu/news/2017/12/uci-and-socalgas-partner-design-advanced-energy-community>

³⁶ California Air Resources Board. LCFS Certified Pathway Carbon Intensities. February 2020. Available at: <https://ww2.arb.ca.gov/resources/documents/lcfs-pathway-certified-carbon-intensities>

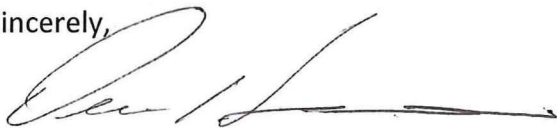
lifecycle perspective. Renewable gases can also achieve numerous co-benefits by helping the energy system be more flexible and work across sectors. For example, conversion of dead trees or other forest waste to renewable gases can dramatically reduce wildfire risks. The Power to Gas concept that can convert excess renewable electricity to hydrogen and store it for months instead of hours as in the case with batteries enables extension of the renewable energy for long durations to meet demand. Finally, renewable gases can reduce greenhouse gases in hard to decarbonize sectors such as agriculture and industry which form the economic engine of California. As the County is aware, SoCalGas is working towards the goal of replacing 5% of our natural gas supply with RNG by 2022, and 20% by 2030.

The CPUC is evaluating the levels of hydrogen that can be blended into the natural gas system. Just last month, Lawrence Livermore National Labs issued a study of how California can get to carbon neutrality by leveraging the gas pipelines and their rights-of-way to convey hydrogen and carbon dioxide.³⁷ In fact, the most cost-effective carbon negative solution is to convert biomass waste to hydrogen and sequester the carbon via pipelines using the rights-of-ways of the natural gas system. In addition, studies show that replacing roughly 16% of SoCalGas throughput with RNG achieves the same emissions reductions as electrifying the entire building sector by 2030.³⁸

Inclusion of RNG as a mitigation strategy also aligns with policies already included in the Draft General Plan. In particular, policies PFS-5.4, PFS-5.5, PFS-5.6, and COS-8.1 all support reuse of waste resources for energy generation as well as replacement of fossil fuels with renewable energy resources, including bioenergy. Accordingly, the use of renewable gases as a mitigation measure seems a natural complement to these policies, whereas a ban on gas infrastructure seems counterproductive. Therefore, we encourage the County to replace Mitigation Measure GHG-1: Prohibit Natural Gas in New Residential Construction, with an alternative mitigation measure that is performance-based, technology neutral and allows for flexibility in use of renewable fuels to help achieve emissions reductions.

We appreciate the opportunity to submit comments on the DEIR and look forward to working with the County as a valuable energy partner to achieve their environmental goals. If you have any questions, please do not hesitate to reach out via telephone or email.

Sincerely,



Deanna Haines
Director Policy, Strategy and Environment

³⁷ Lawrence Livermore National Laboratory. Getting to Neutral. January 2020. Available at: https://www-gs.llnl.gov/content/assets/docs/energy/Getting_to_Neutral.pdf

³⁸ Navigant Consulting, Gas Strategies for a Low-Carbon California Future (April 2018).

Simmons, Carrie

From: Carrie Simmons <csimmons@civicspark.lgc.org>
Sent: Thursday, February 27, 2020 3:38 PM
To: Simmons, Carrie
Subject: Fwd: FW: General Plan / EIR Comments
Attachments: image001.png

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Carrie Simmons
CivicSpark Climate Fellow
Central Coast
csimmons@civicspark.lgc.org
805-654-2834



CivicSpark is a program of the Local Government Commission
www.civicspark.lgc.org

----- Forwarded message -----

From: Curtis, Susan <Susan.Curtis@ventura.org>
Date: Thu, Feb 27, 2020 at 2:20 PM
Subject: FW: General Plan / EIR Comments
To: Carrie Simmons <csimmons@civicspark.lgc.org>

Susan Curtis | Manager

General Plan Update Section

susan.curtis@ventura.org



Ventura County Resource Management Agency | Planning Division

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Ventura County General Plan Update. Join the conversation at VC2040.org

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From: Meghan McMonigle <meghancmcmnigle@gmail.com>

Sent: Thursday, February 27, 2020 2:19 PM

To: Curtis, Susan <Susan.Curtis@ventura.org>; Bev Denicola <de.nicola@cox.net>

Subject: General Plan / EIR Comments

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To: Susan Curtis-

County failed to evaluate mitigation measure for feasibility- 500' set back for "sensitive receptors" from freeways and high traffic roads.

Mitigation Measure AQ-3 (Policy HAZ10-X) creates a minimum 500' set back for "sensitive receptors" from freeways and high traffic roads. Yet the County states in the Land Use section of the EIR that "the majority of the anticipated build out will be within the freeway corridors."

Has the County completed a "buildout study" to ensure that the establishment of this set back still leaves enough room for development to occur? Will this mitigation measure be economically feasible?

Meghan Chambers McMonigle

--

Meghan McMonigle

KTLA 5 Technology Segment Producer

5800 Sunset Blvd. Los Angeles, CA 90028 | *Office: 323-460-5520* | *Cell: 323-371-4042*



Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 3:47 PM
To: Simmons, Carrie
Subject: FW: Petition (205 signers): Count and Mitigate Impacts of Climate Change - Comments and Recommendations
Attachments: Petition VC2040 Draft EIR Sponsor 350 VC Climate Hub.pdf

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

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Ventura County General Plan Update. Join the conversation at VC2040.org
For online permits and property information, visit [VC Citizen Access](#)



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From: 350 Ventura County Climate Hub <VCClimateHub@gmail.com>
Sent: Thursday, February 27, 2020 3:45 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>; ClerkoftheBoard, ClerkoftheBoard <ClerkoftheBoard@ventura.org>
Cc: Bennett, Steve <Steve.Bennett@ventura.org>
Subject: Petition (205 signers): Count and Mitigate Impacts of Climate Change - Comments and Recommendations

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Dear Susan Curtis,

Our policy team compiled and began sharing the attached petition five and a half days ago. Today is our second largest day of signing with a current total of 205 from diverse sectors, mostly West Ventura County. It would not be eight pages long if more of our intelligent recommendations from last year had been adopted and retained by staff. The process would be more efficient and the plan more germane to the many serious impacts of the climate and ecological crisis if you would consult with our team of topical experts before you release the next drafts.

There could be over 500 signatures if we continue asking people to read it.

Please confirm that you received the petition and the 204 signatures and comments emailed via Action Network.

Yours,

Jan Dietrick, Policy Team
350 Ventura County Climate Hub

Petition

Count and Mitigate Impacts of Climate Change in Draft EIR and General Plan Comments and Recommendations

To: Ventura County Board of Supervisors
From: Jan Dietrick and 204 Signatories

With worsening climate change impacts, we reiterate and amplify the concerns the people expressed in January of last year about “climate change and GHGs, and the effects of continued oil and gas extraction including secondary effects related to climate change, air quality, water quality, water supply, traffic, noise, odors, aesthetics, and hazards.”

Our county is warming faster than any other in the nation, our ocean is becoming more hostile to marine life, our last drought was the most intense and lasted longest, and our history of costly floods will be dwarfed when future atmospheric rivers pour over our valleys. Our house is on fire. We need a thorough plan and environmental impacts analysis based on the latest science.

Ventura County’s plan matters. Our larger cities are making climate action plans and look for your example of leadership. The environmental impact from what we do to mitigate climate impacts at the global scale is profoundly influential in trying to stop runaway climate change. This is explained in a new report Insights from the California Energy Policy Simulator about the role of the State of California in the world. Ventura County as a local government hit hardest by climate impacts must step up and meet serious goals. “Insights about California’s climate policies are at the forefront of global efforts to battle climate change. The state’s leadership and success so far have helped maintain momentum despite political headwinds. If California faltered, global efforts to reduce GHG emissions would be dealt a major setback. Meanwhile, the severe risks from runaway global warming are becoming more tangible as the state suffers from wildfires supercharged by climate change.”

A. Four Overall Comments:

We are grateful for the expertise at the law firm of Shute, Mihaly and Wineberger retained by CFROG regarding CEQA. We have appreciated their past comments. We join them in continuing to request the following:

1. Count ALL GHGs that result from activity in our county: Count all burning of oil and gas originating in our county and count all fugitive methane from wells in our county and from methane entering our county that was not counted at the jurisdiction of origin. Do the math on the GHG footprint for heavy exports. We want to mitigate our fair share of all climate impacts from activities within Ventura County. We have to know what they are. Worrying about double counting is not acceptable. Just worry that you haven't counted every cause of climate impacts that we are morally and legally responsible to mitigate with a comprehensive inventory and a systematic plan.

2. Use the latest science to calculate GWP of methane: The global warming potential of GWP is nearly 40 percent greater than what you are using. The International Panel on Climate Change states that over a 20 year period, methane has a GWP of 84 compared to carbon dioxide (up from their previous estimate of 72). The US EPA estimates it at 87 and recent scientific experts put the estimate at 96. We must know the true environmental impact of methane emissions. A complete and scientifically valid GHG inventory is required for a CEQA-compliant Climate Action Plan.

3. Use the emissions reduction goal from Governor Brown's Executive Order B-18-55 "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing greenhouse gas emissions." It is an inadequate compromise, but not as much as the SB 32 goal of 80% below 1990 levels by 2050. City of LA plans to stay within a net zero carbon budget between now and 2045. The proposed GHG reductions in the VC2040 Draft of 41 percent below 2015 levels by 2030, 61 percent by 2040, and 80 percent by 2050 are not ambitious enough for us to do our part to mitigate the climate chaos happening faster than scientists have predicted.

4. Policies and programs must meet the goal: It does not take an in-depth analysis to see that this plan will not achieve the 2030 goal of 40% reduction in GHGs below 1990 levels. A new report Insights from the California Energy Policy Simulator shows that the State of California will fall short of that goal by at least 15 and as much as 45 MMT CO₂e. We have and continue to advocate for a goal aligned with Governor Brown's Executive Order to achieve carbon neutrality as soon as possible and no later than 2045.

B. Some Comments about Impacts and Mitigation

The environmental impacts that concern us are those resulting from governments not making and carrying out plans to mitigate climate change. Your draft analysis does not include most of them. Table B in the Executive Summary is not even half finished. Some of the more serious impacts are missing from the draft analysis. Here are a few of our concerns:

1. Aesthetics, Scenic Resources and Light Pollution and Agriculture and Forest Resources: Mitigation programs are needed to protect our resources from degradation from significant climate impacts. The loss of soil in particular is associated with the downfall of civilizations.

2. Air Quality: The emissions impacts from exceeding criteria pollutant thresholds and also greenhouse gases seem significant and can be mitigated.

3. Biological Resources: The new implementation program is a good start to “update the Initial Study Assessment Guidelines, Biological Resources Assessment report criteria and evaluate discretionary development that could potentially impact sensitive biological resources”. Two kinds of impacts are missing. 1) Climate Change. A major mitigation is the restoration of wetlands which should be at a 2:1 or greater ratio. Stormwater management is another mitigation that reverses the loss of vegetation from drought and floods and supports the restoration of all of the indigenous biology that makes an ecosystem function to maintain the small water cycles. 2) Toxic Pesticide and Herbicide Use and Drift. This must be part of the agenda of a Program for Protection of Sensitive Biological Resources to promulgate the mitigations provided by Integrated Pest Management. Pest management policy must align with the recommendations of the California Department of Pesticide Regulation Roadmap for Integrated Pest Management some of which have climate mitigation co-benefits.

4. Energy: We want a workshop to learn how it is deemed less than significant to allow wasteful, inefficient, or unnecessary consumption of energy resources.

5. Greenhouse Gas Emissions: The climate change impacts are so dire that the mitigations need to be benchmarked to be achieved before it is too late to reverse runaway climate chaos. At minimum we demand a systematic plan for decarbonization of county facilities and electrification of the transportation system.

6. Hazards, Hazardous Materials, and Wildfire: The impacts of toxic explosions, leaks, and spills and the drift of regulated materials and the ignorance of the public about toxic impacts must be addressed where feasible through mitigations that regulate the use and transport of hazardous materials. We have recommended feasible mitigations for people being exposed to the risk of wildfires that have not been accepted by decision-makers.

7. Hydrology and Water Quality: Impacts from climate change and poor land management have led to grave threats to water supply and water quality. These are highly significant--ground water overdraft, overuse and degradation of water quality, erosion, flooding, and siltation. (Impact 4.10-12) The failure to restore small water cycles to keep stormwater in the uplands and maintain forest health is one of the most

serious impacts being mitigated in many places through a paradigm shift about stormwater management. Mitigation is essential--water is life. It requires an integrated water management plan that involves every sector working on every mitigation of which we are aware.

8. Land Use and Planning We want an analysis of incompatible land uses and new development with negative health implications. Closing wells near sensitive sites is a mitigation. Environmental Justice is not examined in the draft EIR.

9. Mineral and Petroleum Resources: We want an analysis of the impact of the scenario in which wells have been put on hold and the operator cannot close the wells for lack of funds. We have no choice. The wells must be closed properly. Fields must be restored to functioning ecosystems to help mitigate climate change impacts. We need insurance as well as bigger bonds.

10. Traffic and Transportation: Tailpipe emissions is an extremely significant environmental impact. The mitigation aimed for in the CTM-C: Vehicle Miles Traveled (VMT) Reduction Program needs assurances of effectiveness via a clear description of what "conditions warrant providing additional mitigations and programs"? This is far too vague to be a mitigation for this significant impact. We have no alternative but to reliably cut GHGs in the transportation sector.

11. Utilities: Failure to develop wholesale and commercial scale renewable energy generation and microgrids is a significant environmental impact because it has forced us to have to get our electricity from fossil fuels via transmission lines that spark wildfires. Community microgrids are a feasible mitigation.

12. Waste Management: Failure to properly manage waste has a highly significant environmental impact, especially when it produces methane super-emitter landfills that is driving climate change, but also the failure to reuse and recycle consumer goods and the materials and equipment discarded by commercial enterprises. We need a more comprehensive approach for mitigation of these impacts.

C. The following policy recommendations for the Draft Plan could help the Plan achieve the GHG reduction goals to mitigate climate change impacts and help the EIR be more relevant to the climate crisis.

Land Use and Community Character: We endorse the comments submitted by Bruce Smith to more firmly assure preservation of agricultural land and open space. We point out the lack of analysis of Environmental Justice policy issues.

Circulation, Transportation, and Mobility:

1. No overriding considerations should allow a project to NOT reduce VMT unless all of the vehicles have zero emissions that will use the proposed project.
2. CTM 3-9 to widen SR 118 has a significant environmental impact.
3. Benchmarks to reduce VMT need to be more clear and the plan needs a review with public input every two years until 2028 and then no longer than every five years.
4. Parking programs should be included in ways that reduce single-occupancy car trips.

Public Facilities, Services, and Infrastructure:

1. Enroll residents in a program to reduce CO2 emissions in their neighborhoods. Ex: Cool Block or Transition Streets.
2. PFS 2.1 must be revised to say include rather than encourage 'Sustainable Plans and Operations' in order to be considered a mitigation of climate change impacts from greenhouse gas emissions.
3. Policy PFS 7.1 should be revised to delete the need for access to gas. The environmental impact from use of natural gas requires carbonizing buildings beginning with no gas connections to new residences . It is therefore contradictory to ensure access to gas.
4. Local renewable energy generation must be part of the mitigation plan for reducing transmission facility fire hazard risk. This is not the same as "Smart Grid Technology". You need experts who know the cutting edge of this field to help write coherent policy on this topic.
5. Zero Waste The County shall achieve zero waste (via a suite of policies to reduce, reuse, and recycle) with no organic waste going to landfills by 2023
6. Zero Waste Policy for Meetings and Events Design and implement a zero waste policy for meetings and events sponsored or permitted by the County to minimize waste and rescue surplus edible food
7. Compostable Take-Out Foodware Require that take-out foodware be made with material compostable in solid waste processing facilities within 60 days
8. Reduce Solid Waste by Phasing Out Single-Use Plastic Evaluate how to best reduce solid waste generation per capita by at least 15% by 2030 including phasing out single-use plastics including but not limited to plastic straws, plastic utensils, plastic take-out containers, and expanded polystyrene
9. Ban Expanded Polystyrene

Conservation and Open Space:

1. Reduce oil and gas production by 40% by 2025 via higher monitoring standards and 2500 ft buffer zones near sensitive sites; reduce production to zero by no later than 2040.
2. Phase-Out of Oil and Gas Production The County shall prohibit new drilling and shall regulate existing wells to assure steady closing of wells beginning near residential and commercial areas.
3. Maintain Policy COS-7.8 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to collect gases and use or remove

them for sale or proper disposal instead of flaring or venting. Flaring should be allowed only in cases of emergency or for testing purposes.

4. Maintain Policy COS-7.7 as recommended by the Board of Supervisors, so that all newly permitted discretionary oil wells are required to convey oil and produced water via pipelines instead of trucking.

5. Detect and curb methane emissions from “super-emitter” sites as identified by NASA.

6. Tax oil and gas production, and related uncaptured methane to raise the needed revenues to fund urgent climate programs to replace high-emission vehicles with a priority on trucking and freight companies, fishing businesses, general contractors and K-12 schools.

7. Require a fully accountable performance bond for all new wells to cover cost of closure Cite LAT article (maybe put on website and link to it).

8. Establish an insurance fund that oil and gas producers contribute to that will cover accidents and closing wells if the producer goes bankrupt.

9. Ban gas-fueled lawn and garden equipment. (Ex: City of Ojai)

10. Accelerate capture of legacy HFCs Enlist the public and private to find and destroy existing stocks of HFC’s (refrigerant gases with extremely high Global Warming Potential).

11. Develop and adopt building codes based on best practices for use of low embodied carbon concrete and set targets for use of low GHG concrete alternatives. Ex: Bay Area Air Quality Management District and King Co, WA.

12. Encourage climate-safe and climate-resilient development through zoning reform and removal of limits on height, density, and minimum parking requirements to enable and promote walkability and a mix of uses for homes and businesses, parks and transit.

13. Create a master local clean energy siting and funding plan for wholesale distributed solar energy plus storage in commercial scale projects producing energy needs by 2030.

14. Provide energy efficiency benchmarking and rebates for low-income housing and renters as well as low-interest loans for small businesses to reduce energy use; assist owners of existing buildings to switch from natural gas to electricity.

15. Prepare sustainable building, siting, landscaping and passive heating and cooling practice guidelines, with a priority on low-income housing, that reduce consumption of non-renewable resources and that include climate and fire-safety in pre-approved plans.

16. Energy Efficiency to Reduce Electricity Use Use Energy Efficiency to Deliver 15% of Projected Needs for electricity in the county by 2023; and 30% by 2030.

17. Efficiency Building Standards for Retrofits Prioritize energy and water efficiency building standards and work to retrofit existing buildings.

18. Decarbonize County Buildings Develop a county building electrification plan eliminating natural gas use in County-owned facilities.

19. Decarbonize All Building Types Develop an electrification plan with goals for GHG emission reductions through renewable energy that evaluates and prioritizes programs for local solar, energy storage and demand response (DR) that disconnects all buildings from gas service by 2050. Include incentives for deep retrofits of inefficient buildings.

Agriculture:

1. Integrated Pest Management where toxic pesticides are a last resort. Create a program that promotes the principles (systems approach, building trust, and effective communication) and pursues the recommendations of the Roadmap for Integrated Pest Management from the University of California and CA Department of Pesticide Regulation. Environmental impacts from toxic pesticides are not described in the Background Report. The Roadmap to an Organic California Policy Report by CCOF Foundation offers information for mitigations and climate action. A workshop is needed.
2. Inorganic Nitrogen Based Fertilizers Set benchmarks for reducing use of inorganic N fertilizer and encourage optimized use of organic and inorganic fertilizer for greatest efficiency in closed nutrient cycles, monitor for nutrient runoff from fields and encourage the use of cover crops and green manure crops to reduce or avoid nitrous oxide (N₂O) emissions and nutrient runoff.
3. Diversified Cropping Systems Encourage farmers to include 1 – 5% of beneficial insect attracting plants in a planted crop, and other methods, such as crop rotation, perennial mowed cover crop in orchards, and integrating multiple species or varieties to enhance the biological and economic stability by spreading economic risk and buffering against pest invasions and extreme weather events, and increase carbon sequestration.
4. Reward Regenerative Farmers with Digestate and Compost from Food Waste Research feasibility of a program for composting food waste for use by farmers and landscapers who use regenerative practices that sequester certified amounts of CO₂.

Water Resources:

1. At least 30,000 acre-feet per year must come from storm water capture by 2035
2. All rainfall must be retained onsite in soil and reservoirs.
3. Slow It. Spread It. Sink It! The County shall enforce Best Management Practices (BMP) and Low Impact Development (LID) for new developments.
4. Recycle all wastewater for beneficial reuse by 2035.
5. Reduce potable water use per capita by 22% by 2025 and 25% by 2035: Offer incentives for water conservation features, including drought tolerant landscaping, permeable materials in standard parkway design guidelines, street trees, infiltration, greywater, and water-saving plumbing.
6. Close oil and gas wells and injection wells near aquifers as a top priority.
7. Create a Master Plan to develop the full potential of integrated water management to infiltrate the ground and recharge aquifers; support reforestation and restoration of watershed ecosystems; conserve and protect groundwater resources, and clean up creeks, streams, and estuaries.
8. Support Santa Clara River Loop Trail and Ventura River Trail Development

Economic Vitality:

1. Agricultural Diversification should include reference to regenerative practices to create biodiversity with opportunities for community members to visit farms.
2. Small Business Promotion. Support approval of caretaker residential space on business property to reduce VMT and more financial strength for small businesses.
3. Green Economy. Prioritize youth and immigrants for workforce development in

industries that promote and enhance environmental sustainability, including GHG reductions, climate adaptation, resiliency and local renewable energy generation, storage and distribution, including solar power, wind power, wave energy, regenerative organic farming and value-added agriculture-related activities, and other appropriate renewable sources.

4. Maritime Economy. Facilitate a sustainable maritime economy using restorative aquaculture techniques that restore ocean health and biodiversity while reviving pre-human fisheries abundance. For example, restore sand-bottom kelp forests and increase kelp forests with flexible floating fishing reefs where the seafloor is otherwise too deep for kelp.

5. Promote Fire-Resistant Infill and Revitalization. Encourage infill development that serves as firebreak rather than as additional fuel for wildfires.

6. Create a Collaborative Structure for Innovation for a Resilient Future. The structure should be able to make decisions and create a way forward for zoning, building and materials and environmental health to allow options for a resilient future, include government officials, innovators and public as described in submissions from Sustainable Living Research Initiative.

7. Parking Infrastructure. Develop parking policies to reduce single occupancy trips associated with employees and business activity to reduce Vehicle Miles Traveled.

8. Master Plan for Distributed Energy Resources and Community Microgrids. Prepare a map of siting options for renewable energy generation and storage facilities and coordinate the identification of financing options for renewable energy resource development, including solar, wind, wave, storage and community microgrids both in front of and behind the meter.

In summary, with the accelerating tipping points, we cannot go half-way in our vision. We need extraordinary courage to set goals we can hang our hopes and efforts on. We want completeness and clarity so we can see how the emissions reduction plan adds up. We want respect for climate science to tell us the truth. We want more ambition. A 2016 decision of the state legislature in SB32 is just not good enough as a goal. We want to see a systematic plan that will assure carbon neutrality no later than 2045.

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 3:53 PM
To: Simmons, Carrie
Subject: FW: General Update Comment Letter from ACCT
Attachments: ACCT Letter to VC County (1).pdf

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740
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Pursuant to the California Public Records Act, email messages retained by the County may constitute public records subject to disclosure.

From: Maverick Media <maverickmedia@hotmail.com>
Sent: Thursday, February 27, 2020 3:50 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Cc: ramirezmcarr@gmail.com; Steve.Bennet@ventura.org
Subject: General Update Comment Letter from ACCT

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

Dear Ms. Curtis,

Please find the attached General Update Comment Letter that is attached. I have also included it in the body of this email.

Thank you,

Carin Wofford

Action for Change in Changing Times

(ACCT)

Cindy Piester

177 Jordan Ave.

Ventura, CA. 93001

February 27, 2020

To: Susan Curtis, General Plan Update Manager

via email (susan.curtis@ventura.org)

RE: Action for Change in Changing Times Comment Letter on the *Draft Environmental Impact Report (EIR) for the County of Ventura Draft 2040 General Plan*

Dear Ms. Curtis,

Action for Change in Changing Times (ACCT) has reviewed portions of the draft EIR and have serious concerns with what we see as a lack of completeness, an entirely inadequate Climate Action Plan, and *a failure to recognize the role of the County in the production of oil and gas*. Lacking and needed are policies and environmental mitigations that ensure we do our share of addressing the climate crisis. On these issues the draft General Plan and the draft EIR, unfortunately, fail.

When this process started in 2015, Ventura County did not realize that we are on the front lines of the Climate Crisis. The current 2.6 degree Celsius rise above pre-industrial levels, major wildfires, droughts and analysis of climate impacts on our County demonstrate that a significant, if not the most significant, land use issue facing this county over the next 20 years is the climate crisis and how we respond through the planning process.

We could not find a clear indication in either of these documents of the total greenhouse gas (GHG) potential produced annually in the county. In fact, the role of the industry in this county appears to be missing in the documents. On an annual basis what is the BTU value of the liquid and gas products extracted by our oil & gas industry? What is the GHG emission from the ultimate production and use of those fossil fuels?

On a planetary scale we need to plan now for the systematic and rapid phase out of oil and gas extraction and shift rapidly to development and use of cleaner renewable fuels -- on that the planet depends.

We cannot find a schedule within the county documents for the systematic and cost-effective winding down of this industry along with a just transition for our workers in the oil field, many of whom will be employed throughout the closing out of production and restoration of land. Others have skills that are directly transferable to clean industries of commercial and residential solar and wind energy.

In summary, ACCT finds the current county drafts unacceptable for planning over the next twenty years with too many unanswered issues in the draft EIR.

We, the undersigned residents of Ventura County, respectfully call for the above concerns to be fully addressed.

Cindy Piester

Carin Wofford

Jabbar Wofford

Leslie Purcell

Margo Davis

Gail Hodgson

Alan Hodgson

Carol Vasecky

Alex Uvari

Marisa Sanchez

Arturo Guido

Frank Bognar

Geoffrey Dann

Wendy Lofland

Rosyln Jean Scheuerman

Paul Benevidez

Nissa Benevidez

Ivsar Marina

Andrew Steel

Nancy Genevieve Oatway

Nicholas Oatway

Rev. Dr. Audrey Wise Vincent

Martin Jones

Susan Shamroy

Margaret Wilson

Nikki G. Alexander

Edward G. Alexander

Dianne Kenny

Judith Cuevas

Ray Cuevas

Gillian Dale

Nancy Shuman

Mark Shuman

Amelia Aparicio

Jeremy Kersch

Debra Myrent

Nick Corrett

Janet Murphy

Heidi Rosenfield

Sheila Williams

Lucy Duffy

Frank Peterson

Heidi Whelan

Sandy Beckner

Laura Schneider

Betsy Shipley

Gerald Schwanke

Angela Grismer

Julie Shaw

Diana Cooley

Pam Holley-Wilcox

Karen Trowbridge

Beverly Brovsky

Arnett Smithson

Action for Change in Changing Times
(ACCT)
Cindy Piester
177 Jordan Ave.
Ventura, CA. 93001
February 27, 2020

To: Susan Curtis, General Plan Update Manager
via email (susan.curtis@ventura.org)

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Nissa Benevidez
Ivsar Marina
Andrew Steel
Nancy Genevieve Oatway
Nicholas Oatway
Rev. Dr. Audrey Wise Vincent
Martin Jones
Susan Shamroy
Margaret Wilson
Nikki G. Alexander
Edward G. Alexander
Dianne Kenny
Judith Cuevas
Ray Cuevas
Gillian Dale
Nancy Shuman
Mark Shuman
Amelia Aparicio
Jeremy Kersch
Debra Myrent
Nick Corrett
Janet Murphy
Heidi Rosenfield
Sheila Williams
Lucy Duffy
Frank Peterson
Heidi Whelan
Sandy Beckner
Laura Schneider
Betsy Shipley
Gerald Schwanke
Angela Grismer
Julie Shaw
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Pam Holley-Wilcox
Karen Trowbridge
Beverly Brovsky
Arnett Smithson

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 4:20 PM
To: Simmons, Carrie
Subject: FW: Climate change has environmental impacts!

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
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From: Kari Aist <info@email.actionnetwork.org>
Sent: Thursday, February 27, 2020 4:20 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: Climate change has environmental impacts!

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

Susan Curtis,

Dear Ventura County Board of Supervisors and Planning Department,

Climate issues are something I feel worried about. Ventura County is warming faster than any county in the nation. Our ocean is acidifying faster. Drought and floods have hit us worse, and we can expect more extreme weather.

My family and community are counting on you to assure analysis of the full scope of environmental impacts and mitigations in the Draft EIR.

First, it is necessary that all greenhouse gas emissions be counted based on the most current science.

There are many ways to mitigate climate impacts, like a sunset plan for oil and gas production, decarbonization of transportation and buildings, zero waste, incentives for regenerative agriculture and water management, and reducing emissions from tailpipes.

I want an EIR that covers major climate impacts via a systematic plan.

Thank you for listening to the people and doing what's right for the health of your constituents, the ones you represent.

Remember this: we ALL live downstream.

Thank you—

Kari Aist

Mom4mykids@gmail.com

8892 Tacoma St

Ventura, California 93004

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 4:26 PM
To: Simmons, Carrie
Subject: FW: 2040 General Plan Comments

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

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From: Lizzy Martinez <emchambers@aol.com>
Sent: Thursday, February 27, 2020 4:20 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Cc: General Plan Update <GeneralPlanUpdate@ventura.org>
Subject: 2040 General Plan Comments

Sanger Hedrick, Chair

Agricultural Policy Advisory Committee (APAC) County of Ventura
[800 S. Victoria Blvd.](#)
[Ventura, CA 93003](#)

Re: 2040 General Plan Environmental Impact Report (EIR)

Dear Mr. Hedrick and Honorable Members of APAC:

Thank you for the opportunity to provide comments following today's presentation by Ventura County Planning staff on the 2040 General Plan EIR.

There are several issues with the 2040 General Plan EIR that CoLAB believes will negatively impact the viability of local agriculture.

Proposed mitigation measure AG-2: The County proposes that any project that either directly or indirectly results in the loss of farmland must obtain and place into perpetual agricultural preservation twice the total of the farmland loss. This mitigation measure is infeasible. Contrary to statements made by County Planning staff today at the APAC meeting, the California Environmental Quality Act (CEQA)

requires that all mitigation proposed in an EIR be feasible. CEQA Section 21061.1 defines feasible as “capable of being accomplished in a successful manner within a reasonable period of time, ” (*emphasis added*). All mitigation measures proposed in an EIR must be shown to reduce impacts and an infeasible mitigation measure, by definition, cannot and will not reduce impacts.

The EIR does not provide evidence of any of the following:

1. 1) Whether there is sufficient land available for purchase/conservation easement for each farmland category;
2. 2) The cost per acre to purchase each category of farmland;
3. 3) The anticipated cost of establishing a conservation easement for each category of farmland;
4. 4) The anticipated cost associated with managing each category of farmland under a conservation easement;
5. 5) The anticipated cost associated with monitoring these mitigation parcels scattered throughout the County and who will bear that cost;
6. 6) Any information that could constitute a “plan” for management of farmland in conservation easements;

February 19, 2020

[Ventura County Coalition of Labor, Agriculture and Business / 1672 Donlon Street, Ventura, CA 93003 / 805-633-2260 / info@colabvc.org](#)

Page 2 of 4

7. 7) An analysis of direct and indirect impacts caused by this mitigation measure (including impacts associated with LU compatibility conflicts and increased urban-ag-interface);
8. 8) Whether the smallest possible mitigation acreage required will achieve the minimum to ensure viability of agriculture on the parcel; and
9. 9) Whether the proposed mitigation is in conflict with other ordinances and regulations, such as the County’s Zoning Ordinance and the County’s minimum lot sizes.

The County is already aware that this proposed mitigation measure is infeasible. On March 24, 2016, at a Local Agency Formation Commission (LAFCo) hearing, Supervisor Linda Parks attempted to establish an “Agricultural Mitigation Measure” through the LAFCo project approval process. The mitigation measure would have required the 1-to-1 purchase of local farmland (half of what is proposed in the 2040 General Plan EIR) to replace farmland that would be impacted by any proposed development. Ventura County Counsel, Michael Walker, informed both LAFCo and Supervisor Parks that the proposed

mitigation measure did not meet the standard for economic feasibility, and, for that and other reasons, LAFCo could not adopt Supervisor Park's proposed mitigation measure. He referenced a 2015 legal decision, *City of Irvine v. County of Orange*, in which the Court stated, "the sheer astronomical expense of land supports the finding of the EIR that the purchase of an agricultural conservation easement is a non-starter."

In addition to being infeasible, CoLAB does not believe that this mitigation measure will reduce impacts on agricultural land, as it does not address the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

Indirect Impacts

The EIR dismisses "indirect impacts" that will occur as a result of implementing the 2040 General Plan as "less than significant."

Page 4.2-13 of the EIR states "AG-2.3 maintains the Right-to-Farm Ordinance to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas...These sections of the code protect farmers engaged in agricultural activity from public nuisance claims...This protects the farming community, including Important Farmlands and farms less than 10 acres, from developments that would inhibit their ability to continue agricultural production."

Page 4.2-17 of the EIR states: "Residential growth in areas nearby agricultural lands has the potential to result in land use conflicts. Residential land uses are generally more sensitive and prone to conflict with adjacent agricultural land uses than commercial or industrial land uses. The placement of sensitive land uses, such as residences and schools, nearby classified farmland can negatively impact both uses due to conflict including odor nuisances and noise from agriculture machinery. The countywide Right-to-Farm Ordinance protects existing agricultural and farming operations from conflicts attributed to residential development...Therefore, the potential for conflicts would be minimal. This impact would be less than significant" (*emphasis added*).

This is simply not true. Historic and recent County actions have shown that the County has and will continue to create new restrictions and ordinances that have a significant impact on existing agricultural

[Ventura County Coalition of Labor, Agriculture and Business / 1672 Donlon Street, Ventura, CA 93003 / 805-633-2260 / \[info@colabvc.org\]\(mailto:info@colabvc.org\)](#)

Page 3 of 4

and farming operations because of conflicts attributed to residential development. The recent interim urgency ordinance restricting hemp cultivation is one such example.

Contrary to statements made today by Ventura County Planning staff, an EIR, whether it is labeled as "programmatic" or "project", must analyze all reasonably foreseeable consequences of the action that is proposed. For the 2040 General Plan EIR, the action proposed is the implementation of all policies and programs within. Therefore, if the implementation of a policy in the 2040 General Plan will result in an impact, that impact must be analyzed. For example, the 2040 General Plan contains land use designation changes that will increase allowable housing density near agricultural land. It is reasonably foreseeable

that more houses will create more compatibility conflicts with normal farming operations. The impact of these compatibility conflicts must be addressed in the EIR.

In 2014, the California Court of Appeal stated in a ruling that “[T]he fact that this EIR is labeled a ‘project’ rather than a ‘program’ EIR matters little....Designating an EIR as a program EIR ... does not by itself decrease the level of analysis otherwise required in the EIR. All EIRs must cover the same general content. The level of specificity of an EIR is determined by the nature of the project and the “rule of reason,” rather than any semantic label accorded to the EIR.”

It is CoLAB’s opinion that indirect impacts from increasing urban-ag interface are SIGNIFICANT and cannot be dismissed in the EIR.

Direct and indirect impacts of increased costs

The 2040 General Plan has policies that will increase the costs of normal farming operations. CoLAB believes that the most effective way to minimize conversion of agricultural land to non-agricultural uses is to take active measures to allow farming to remain profitable. And even the County admits that reducing the cost of farming reduces conversion of agricultural land in their discussion of the Williamson Act in Chapter 4.2 of the EIR.

But the County fails to analyze direct and indirect impacts of 2040 General Plan policies that will increase the cost of normal farming operations, such as:

- Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment. The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment when feasible.
- Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps. The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilities to eliminate or reduce standby charges.

Direct and indirect impacts of increased competition for water resources

The County fails to evaluate the impact of increased competition for water resources caused by development allowed in the 2040 General Plan on either the conversion of agricultural land or the loss of agricultural lands through the loss of topsoil.

The EIR states on page 4.2-3 that “...a reduction in available water resources for irrigation” is an example of indirect impacts on agricultural land due to loss of topsoil from increased wind and water erosion.

But the County fails to analyze or propose mitigation measures to address this significant impact.

[Ventura County Coalition of Labor, Agriculture and Business / 1672 Donlon Street, Ventura, CA 93003 / 805-633-2260 / info@colabvc.org](http://www.colabvc.org)

APAC is the expert charged with advising County decision-makers on agricultural issues in Ventura County. And the County should be seeking guidance from APAC about the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory

demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

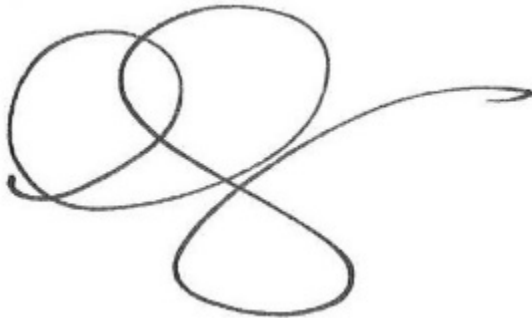
CoLAB encourages APAC to provide guidance to the County on appropriate and effective mitigation measures to prevent the conversion of agricultural land to non-agricultural uses. These may include:

1. 1) Strengthen the Right-to-Farm ordinance to prevent nuisance complaints from being used to justify the creation or expansion of setbacks or regulatory restrictions on normal farming practices;
2. 2) Expand the Land Conservation Act Program to include Open Space zoned properties that are engaged in farming (including grazing); and
3. 3) Protect agricultural land from urban-ag interface encroachment and compatibility conflicts by establishing setbacks on NON-AE-zoned land that will restrict the construction of bike paths, public trails, and sensitive receptors within 2000' of any land zoned A/E.

Thank you again for the opportunity to provide comments on this issue. We appreciate your consideration and leadership at this time.

Sincerely,

Louise Lampara Executive Director

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal tail extending to the right.

In support of this letter-
Elizabeth Chambers Martinez

Sent from my iPhone

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 7:57 AM
To: Simmons, Carrie
Subject: FW: 2040 General Plan Draft EIR Comment

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740
Visit the Planning Division website at vcrma.org/planning
Ventura County General Plan Update. Join the conversation at VC2040.org
For online permits and property information, visit [VC Citizen Access](#)



Pursuant to the California Public Records Act, email messages retained by the County may constitute public records subject to disclosure.

From: John Chambers <jechambers330@gmail.com>
Sent: Thursday, February 27, 2020 6:35 AM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: 2040 General Plan Draft EIR Comment

Dear Ms. Curtis:

-

I am writing to call your attention to significant flaws in the process, data, and conclusions of the Ventura County General Plan, Draft EIR, and supplemental documents.

-

My great grandfather, Mark McLoughlin (1843-1914), was a true Ventura County pioneer, purchasing his first 318 acres of undeveloped land in Ventura County in 1875. He was a hard-working visionary, revered by his community. With his son—my grandfather, James Patrick McLoughlin—he raised livestock and farmed the land, providing jobs and feeding the growing towns of Oxnard and Ventura.

-

Our land, in a vitally important location on Olivas Park Drive across from the Ventura Marina, has been in the family, and part of the economic fabric of the community, for 100 years. And we want it to be part

of the future of this community, with a flourishing economy, a thriving job market, and unsurpassed quality of life for its residents.

-

But the General Plan and DEIR do not describe a viable path for us as landowners going forward.

-

I will begin with some specific issues regarding language in the Coastal Area Plan, 4-82-83 and 4-94-95. Part of our land is located in the Central Coastal Zone, adjacent to the Ventura Marina, on Olivas Park Drive at Harbor Blvd. The only conclusion the Plan draws about our land is the statement that, “unlike the Preble area, services are not readily available to the Olivas lands.” This is false. Our property has access to all utilities, water, main roads, and the freeway. Indeed, easements on our property serve surrounding areas with utilities.

-

The Plan also claims that our property is “not included in the City’s sanitation district because of problems with water pressure.” This language is irrelevant and incorrect. There is no evidence that there are water pressure issues, and the sanitation district’s pipelines actually traverse our property.

-

While we do not know the original source of these misstatements, such misrepresentations—now repeated in the Plan—threaten to diminish the value of our land in relation to the Preble property. And, of course, they undermine the goal and the value of the Plan itself.

-

The General Plan also speaks of the widening of Olivas Park Drive, our southern boundary. This would have a direct impact on our property. But the Plan does not address how this would happen or how it would affect our land.

-

Damaging misstatements about our property also appear in the DEIR. Contrary to the portrayal in the DEIR, our property has significant infrastructure in place, as well as prime accessibility to the highway and the harbor. In fact, with easy access to the marina and beach community, and with the railroad as part of our eastern boundary, our land is uniquely suited to be an important part of future economic development in the area. We are entitled to have all these matters corrected.

-

I would also like to raise some additional concerns:

-

1. The General Plan and DEIR continue to ignore the 28% increase in the homeless population in our community.

-

2. According to the General Plan, if we were to build an acre of low income / worker housing we would need to buy two replacement acres of same Ag land to be placed into perpetual agricultural preservation. This is unrealistic and infeasible, and certainly not in line with the State government's housing policies.

-

3. The EIR does not adequately address the enormous "indirect impacts" that will occur as a result of implementing the General Plan, calling them "less than significant."

-

4. The General Plan contains policies that will increase the costs of normal farming operations, making it difficult for farming to remain profitable.

-

5. The Plan does not adequately evaluate the impacts of increased competition for water in our community.

-

The EIR is a flawed document, full of errors, that does not disclose all impacts, direct and indirect, caused by the General Plan. It was obviously rushed—completed in six weeks. It is inaccurate and incomplete, and fails to provide members of the community with the information that they are legally entitled to. This EIR should be corrected and reconsidered, and a reasonable time period should be allowed for meaningful and thoughtful community input.

-

Sincerely,

John Chambers

--

John Chambers

Simmons, Carrie

From: Suzanne Kelly <suzanne.bcos@gmail.com>
Sent: Thursday, February 27, 2020 2:42 PM
To: General Plan Update; Curtis, Susan
Cc: Borchard, John
Subject: Comments on DEIR re: VC 2040 General Plan
Attachments: Letter to Board of Supervisors 2-27-20.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

Please find the attached letter urging the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR.

Suzanne Borchard Kelly
BORCHARD COMPANIES, INC.
2112 Eastman Avenue, Suite 103
Ventura, CA 93003
805-639-0998

Farm and Investment Operations of

John W. Borchard Trusts
John W. Borchard, Jr.
J. David Borchard
Patricia Borchard Trusts
Cecilia Borchard Trusts
Ernest Borchard Ranch Co., LLC
Knittles Ranch Co.
Greenhills Ranch Co.
John W. Borchard Ranches, Inc.



Suzanne Borchard Kelly
President
2112 Eastman Ave., Suite 103
Ventura, CA 93003
(805) 639-0998
Fax (805) 639-0898

John W. Borchard, Jr.
Chief Financial Officer
805-386-5716

J. David Borchard
Farm Manager
(805) 444-3283

February 27, 2020

VIA ELECTRONIC MAIL: GeneralPlanUpdate@ventura.org

Ventura County Board of Supervisors
Attn: RMA Planning Division
General Plan Update
800 Victoria Avenue L#1740
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners was that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economically feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires that all farm equipment be converted to electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

After devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

Furthermore, for the good of the County, its employees, and its citizens should not the implications to land values, therefore assessed values, therefore property tax collections be considered an unmitigated impact? I would think that Ventura County is a wonderful example of government for the people, all of its people, taxpayers and beneficiaries of government services alike. I would also think that it is irresponsible for the Board of Supervisors to ignore this impact. I have not seen an analysis of economic impacts in the body of the proposed 2040 General Plan DEIR. I think this is a serious omission.

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

Sincerely,

John W. Borchard, Jr.
Chief Financial Officer
Borchard Companies, Inc.

Gabriel R. Duarte
4014 Brindisi Place
Moorpark, CA 93021

February 27, 2020

Ventura County Board of Supervisors
Attn: Susan Curtis, Manager, General Plan Update Section
800 South Victoria Avenue, L#1740
Ventura, CA 93009-1740

I'm writing to you as a concerned resident of the County regarding the viability of the oil and gas industry in Ventura County.

The 2040 General Plan Draft EIR fails to give proper analysis to oil and gas mineral resources.

Neither the EIR nor the Background report provide a complete and thorough description of the existing, current regulatory setting that oversees the management and production of mineral resources in the County and the State of California. The EIR and the Background Report only disclose federal and state agencies that regulate pipelines and flaring, which is not applicable to all mineral resources that must be analyzed in an EIR under CEQA guidelines. The EIR should be revised to include an overview and description of all potential regulations, regulatory bodies, and programs that regulate mineral resources in Ventura County.

The EIR fails to actually analyze for direct and indirect impacts to mineral resource zones that will occur as a result of the 2040 General Plan. The County admits that Land Use Designation changes in the 2040 General Plan will result in changes to land uses OVER known and important mineral reserves. But neither the EIR nor the Background Report provide any information regarding estimated and anticipated "buildout" in terms of acreage, actual location, number of dwelling units, and development density and intensity. These incompatible land uses will significantly impact future mineral resource production and must be evaluated and mitigated for in the EIR.

The EIR never addresses indirect impacts to mineral resource development that will occur under the 2040 General Plan. As incompatible land uses (such as residential development) occur on or adjacent to mineral production and mineral reserves, compatibility conflicts will increase. Reasonably foreseeable indirect impacts include nuisance complaints, traffic conflicts, theft, vandalism and attempted trespass on mineral production sites. The EIR must analyze and evaluate these impacts on the ability to produce mineral resources in the County.

The Draft EIR is lacks critical analysis and must be corrected and recirculated to ensure a fair process for Ventura County residents.

Thank you,



Simmons, Carrie

From: Bell, Korinne
Sent: Thursday, February 27, 2020 3:43 PM
To: General Plan Update; Curtis, Susan
Cc: Williams, Ed; Schilder, Annemiek M.; Sanger Hedrick; Scott Deardorff; gordon@kimballengineering.com; patty.waters@aol.com; Bobby Jones; Thille, Alec
Subject: APAC Response Letter Re Draft EIR
Attachments: 3146_001.pdf; CoLAB Comments to APAC GPU EIR 2_19_2020.pdf

Good afternoon,

Please accept the Response Letter to the Draft EIR for the Ventura County General Plan Update, and accompanying Comment Letter from VC CoLAB, sent on behalf of the Agricultural Policy Advisory Committee (APAC).

Thank you,

Korinne Bell
Chief Deputy Agricultural Commissioner

VENTURA COUNTY

Agricultural Policy Advisory Committee

Sanger Hedrick, Chair, District 2; Scott Deardorff, District 1; Gordon Kimball, District 3;
Patty Waters, District 4; Bobby Jones, District 5

February 27, 2020

RMA Planning Division, General Plan Update
800 S. Victoria Ave, L#1740
Ventura, CA 93009-1740

RE: APAC Comments Regarding the VC 2040 General Plan EIR

The Ventura County Agricultural Policy Advisory Committee (APAC), so states that, after a unanimous vote of the quorum present at the 19 February 2020 APAC meeting, finds flaws with the Ventura County 2040 General Plan EIR. As such, the APAC requests an extension to the comment period and submits the following comments regarding the EIR and the Draft General Plan:

First and foremost, the mitigating measures proposed in the EIR have not been sufficiently evaluated for efficacy or feasibility. For example, Mitigating Measure AG-1 has previously been rejected by LAFCo as infeasible due to the high cost associated with purchasing conservation easements. Additionally, the APAC strongly believes that Mitigation Measure AG-1 would lead to vacant land, as the General Plan does not include policies or programs that would increase the long-term viability of agriculture in Ventura County and the Mitigating Measure places land into conservation easements in effective perpetuity. Some ways to improve the mitigation of the impact would include:

- Creation of a Conservation Easement Bank for agricultural conservation easements to facilitate both the full-value sale of and ease of purchase of said easements
- The allowance of conservation easements to be sold on portions of a parcel or for legal-nonconforming parcels to be formed as part of the sale
- Policies or programs that would reduce anti-agricultural pressures on lands within conservation easements, such as improved water access/rights, exemptions for agricultural operations from overlay and corridor requirements, and/or an improved and codified Ag/Urban Buffer Policy

AGRICULTURAL POLICY ADVISORY COMMITTEE (APAC)
Advisory Letter to the VC BOS

Furthermore, Impact 4.2-2 is found to be "Less than Significant" with no need for additional mitigating measures solely on the basis of existing policy, ordinances, etc without an evaluation of the effectiveness of those policies at reducing impact under the existing General Plan. As recently demonstrated by Board action in enacting Ventura County Urgency Ordinance No. 4558, at least one of the cited protections does not provide the protection assumed in the General Plan and EIR, and as such should not be considered so strongly in mitigating the Impacts of allowing development near agricultural operations and soils.

Further support for the assertions made here is included with this letter is the letter to APAC by Ventura County CoLAB. The letter provides further detail on the omissions and failures of the EIR, as well as some suggestions for improvement.

Agriculture is unique, as an industry it is the only one so specifically regulated by the General Plan. It is also a primary part of Ventura County historically, economically, aesthetically, culturally, and in many other ways. The EIR fails to identify impacts of the General Plan to agriculture in the county, impacts that would allow the continued reduction in agricultural lands and agricultural viability. For agriculture to be a part of Ventura County's future, please take these observations and recommendations into careful consideration when revising both the EIR and General Plan itself.


Sanger Hedrick, Chair


Scott Deardorff, District 2



Gordon Kimball, District 3


Patty Waters, District 4

Bobby Jones, District 5



February 19, 2020

Ventura County CoLAB
Board of Directors & Officers

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Chairman

Mark Mooring, Buon Gusto Farms
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Director

Tony Skinner, IBEW Local 952
Director

Alex Teague, Limoneira
Director

Andy Waters, Waters Family Farms
Director

Sanger Hedrick, Chair
Agricultural Policy Advisory Committee (APAC)
County of Ventura
800 S. Victoria Blvd.
Ventura, CA 93003

Re: 2040 General Plan Environmental Impact Report (EIR)

Dear Mr. Hedrick and Honorable Members of APAC:

Thank you for the opportunity to provide comments following today's presentation by Ventura County Planning staff on the 2040 General Plan EIR.

There are several issues with the 2040 General Plan EIR that CoLAB believes will negatively impact the viability of local agriculture.

Proposed mitigation measure AG-2: The County proposes that any project that either directly or indirectly results in the loss of farmland must obtain and place into perpetual agricultural preservation twice the total of the farmland loss. This mitigation measure is infeasible. Contrary to statements made by County Planning staff today at the APAC meeting, the California Environmental Quality Act (CEQA) requires that all mitigation proposed in an EIR be feasible. CEQA Section 21061.1 defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time, **taking into account economic, environmental, social, and technological factors**" (*emphasis added*). All mitigation measures proposed in an EIR must be shown to reduce impacts and an infeasible mitigation measure, by definition, cannot and will not reduce impacts.

The EIR does not provide evidence of any of the following:

- 1) Whether there is sufficient land available for purchase/conservation easement for each farmland category;
- 2) The cost per acre to purchase each category of farmland;
- 3) The anticipated cost of establishing a conservation easement for each category of farmland;
- 4) The anticipated cost associated with managing each category of farmland under a conservation easement;
- 5) The anticipated cost associated with monitoring these mitigation parcels scattered throughout the County and who will bear that cost;
- 6) Any information that could constitute a "plan" for management of farmland in conservation easements;

- 7) An analysis of direct and indirect impacts caused by this mitigation measure (including impacts associated with LU compatibility conflicts and increased urban-ag-interface);
- 8) Whether the smallest possible mitigation acreage required will achieve the minimum to ensure viability of agriculture on the parcel; and
- 9) Whether the proposed mitigation is in conflict with other ordinances and regulations, such as the County's Zoning Ordinance and the County's minimum lot sizes.

The County is already aware that this proposed mitigation measure is infeasible. On March 24, 2016, at a Local Agency Formation Commission (LAFCo) hearing, Supervisor Linda Parks attempted to establish an "Agricultural Mitigation Measure" through the LAFCo project approval process. The mitigation measure would have required the 1-to-1 purchase of local farmland (half of what is proposed in the 2040 General Plan EIR) to replace farmland that would be impacted by any proposed development. Ventura County Counsel, Michael Walker, informed both LAFCo and Supervisor Parks that the proposed mitigation measure did not meet the standard for economic feasibility, and, for that and other reasons, LAFCo could not adopt Supervisor Park's proposed mitigation measure. He referenced a 2015 legal decision, *City of Irvine v. County of Orange*, in which the Court stated, "the sheer astronomical expense of land supports the finding of the EIR that the purchase of an agricultural conservation easement is a non-starter."

In addition to being infeasible, CoLAB does not believe that this mitigation measure will reduce impacts on agricultural land, as it does not address the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

Indirect Impacts

The EIR dismisses "indirect impacts" that will occur as a result of implementing the 2040 General Plan as "less than significant."

Page 4.2-13 of the EIR states "AG-2.3 maintains the Right-to-Farm Ordinance to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas...These sections of the code protect farmers engaged in agricultural activity from public nuisance claims...This protects the farming community, including Important Farmlands and farms less than 10 acres, from developments that would inhibit their ability to continue agricultural production."

Page 4.2-17 of the EIR states: "Residential growth in areas nearby agricultural lands has the potential to result in land use conflicts. Residential land uses are generally more sensitive and prone to conflict with adjacent agricultural land uses than commercial or industrial land uses. The placement of sensitive land uses, such as residences and schools, nearby classified farmland can negatively impact both uses due to conflict including odor nuisances and noise from agriculture machinery. The countywide Right-to-Farm Ordinance protects existing agricultural and farming operations from conflicts attributed to residential development...**Therefore, the potential for conflicts would be minimal. This impact would be less than significant**" (*emphasis added*).

This is simply not true. Historic and recent County actions have shown that the County has and will continue to create new restrictions and ordinances that have a significant impact on existing agricultural

and farming operations because of conflicts attributed to residential development. The recent interim urgency ordinance restricting hemp cultivation is one such example.

Contrary to statements made today by Ventura County Planning staff, an EIR, whether it is labeled as “programmatic” or “project”, must analyze all reasonably foreseeable consequences of the action that is proposed. For the 2040 General Plan EIR, the action proposed is the implementation of all policies and programs within. Therefore, if the implementation of a policy in the 2040 General Plan will result in an impact, that impact must be analyzed. For example, the 2040 General Plan contains land use designation changes that will increase allowable housing density near agricultural land. It is reasonably foreseeable that more houses will create more compatibility conflicts with normal farming operations. The impact of these compatibility conflicts must be addressed in the EIR.

In 2014, the California Court of Appeal stated in a ruling that “[T]he fact that this EIR is labeled a ‘project’ rather than a ‘program’ EIR matters little....Designating an EIR as a program EIR ... does not by itself decrease the level of analysis otherwise required in the EIR. All EIRs must cover the same general content. The level of specificity of an EIR is determined by the nature of the project and the “rule of reason,” rather than any semantic label accorded to the EIR.”

It is CoLAB’s opinion that indirect impacts from increasing urban-ag interface are SIGNIFICANT and cannot be dismissed in the EIR.

Direct and indirect impacts of increased costs

The 2040 General Plan has policies that will increase the costs of normal farming operations. CoLAB believes that the most effective way to minimize conversion of agricultural land to non-agricultural uses is to take active measures to allow farming to remain profitable. And even the County admits that reducing the cost of farming reduces conversion of agricultural land in their discussion of the Williamson Act in Chapter 4.2 of the EIR.

But the County fails to analyze direct and indirect impacts of 2040 General Plan policies that will increase the cost of normal farming operations, such as:

- Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment. The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment when feasible.
- Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps. The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilities to eliminate or reduce standby charges.

Direct and indirect impacts of increased competition for water resources

The County fails to evaluate the impact of increased competition for water resources caused by development allowed in the 2040 General Plan on either the conversion of agricultural land or the loss of agricultural lands through the loss of topsoil.

The EIR states on page 4.2-3 that “...a reduction in available water resources for irrigation” is an example of indirect impacts on agricultural land due to loss of topsoil from increased wind and water erosion. But the County fails to analyze or propose mitigation measures to address this significant impact.

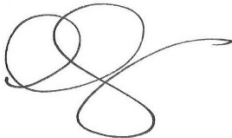
APAC is the expert charged with advising County decision-makers on agricultural issues in Ventura County. And the County should be seeking guidance from APAC about the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

CoLAB encourages APAC to provide guidance to the County on appropriate and effective mitigation measures to prevent the conversion of agricultural land to non-agricultural uses. These may include:

- 1) Strengthen the Right-to-Farm ordinance to prevent nuisance complaints from being used to justify the creation or expansion of setbacks or regulatory restrictions on normal farming practices;
- 2) Expand the Land Conservation Act Program to include Open Space zoned properties that are engaged in farming (including grazing); and
- 3) Protect agricultural land from urban-ag interface encroachment and compatibility conflicts by establishing setbacks on NON-AE-zoned land that will restrict the construction of bike paths, public trails, and sensitive receptors within 2000' of any land zoned A/E.

Thank you again for the opportunity to provide comments on this issue. We appreciate your consideration and leadership at this time.

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Louise Lampara
Executive Director

Simmons, Carrie

From: David Armstrong <david@smithhobson.com>
Sent: Thursday, February 27, 2020 3:45 PM
To: General Plan Update
Subject: General Plan DEIR Comment Letter
Attachments: GPDEIR Comment Ltr 2020.pdf

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

Susan,

Please see attached comment letter on the DEIR for the General Plan Update.

David S. Armstrong | CEO



Smith-Hobson, LLC

63 North Ash Street
Ventura, CA 93001
T: 805.648.3363
C: 310.600.6682

February 27, 2020

Susan Curtis, Manager
General Plan Update Section
Ventura County Planning Division
800 S. Victoria Ave
Ventura, CA 93009

VIA Email: GeneralPlanUpdate@ventura.org

Dear Ms. Curtis,

The Ventura County General Plan Update Draft Environmental Impact Report (DEIR) fails to adequately address the impacts associated with the policies proposed by the draft General Plan. Specifically, this letter comments on DEIR Section 4.2 – Agriculture and Forestry Resources.

Section 15168 (b)(2) of the California Resources Code identifies one of the advantages of a Program EIR as ensuring “consideration of cumulative impacts that might be slighted in a case-by-case analysis.” The DEIR further clarifies: “The impact analysis provided in this section addresses the physical changes to the existing environment that could occur as a result of 2040 General Plan implementation.”

The methodology of the analysis (Section 4.2.2) addresses only future development and land-use conflicts. Implementation of the General Plan is much more complex. This approach treats agricultural resources as just another land use designation while ignoring the viability of what CEQA determined to be a critical and valuable part of our environment.

There are numerous deficiencies but for brevity I will review the first two scoring factors in the California LESA model: water availability and project size. Both are critical to the viability of sustainable agricultural production but the impacts of the proposed General Plan policies and DEIR mitigations are not properly analyzed or evaluated. The proposed policies and mitigations could result in the conversion of Farmland to non-agricultural uses or create physical changes that are not analyzed or meaningfully mitigated under the DEIR.

Water Availability. The DEIR passingly references the importance of water to agricultural sustainability but fails to quantify existing conditions or anticipated changes in availability for agricultural uses. The Background Report and Section 4-10 identify groundwater basins in overdraft including the Oxnard Plain Basin that provides more than half of all agricultural irrigation water in the county. The proposed GSP for the Oxnard Basin will require significant reductions in agricultural groundwater extraction over the next 20 years - possibly up to 50%. The head of the Fox Canyon GMA is advocating for the full reductions immediately.

It is not possible to irrigate the same amount of land with half the water. The reductions in available water for irrigation and increased costs will necessarily lead to the fallowing of thousands of acres of agricultural land during the General Plan’s 20-year time horizon.

Unplanted areas will be subject to increased erosion from wind and water forces. The proposed General Plan policies will play a significant role in the conversion of current Farmland to non-agricultural uses.

The proposed mitigations of permanently restricting agricultural lands on a 2:1 basis is well established to be infeasible (see LAFCo analysis). Without water, the designated land could not be used for agricultural production. There is no analysis of any of the impacts from significant water supply reductions and the DEIR is inadequate.

Project Size. According to the DEIR, the county contains prime agricultural lands that “...are capable of supporting commercially viable agricultural operations on minimum 9-acre parcels. According to the most recent data from the USDA (2017), the majority of farms in the county are less than 50 acres and approximately half of the farms are less than 10 acres.”

Despite this data, the General Plan sets a minimum lot size for Agriculture that is at least four times larger than half of the existing farms:

Policy LU-8.3: Minimal Parcel Size for the Agricultural Land Use Designation. The County shall ensure that the smallest minimum parcel size consistent with the Agricultural land use designation is 40 acres. The County may require larger minimum parcel sizes based on the zone classification.

For farms located in an Open Space land-use designation, the minimum lot size is 10 acres. These policies may make more than half of all farms nonconforming with the underlying General Plan. The probability that a nonconforming farm lot was created legally is extremely low. Over the extended life of the plan, the impacts on agricultural resources are potentially profound.

LU 4-4 and Sec. 8113-8 of the Non-Coastal Zoning Ordinance, for example, prohibit the allowed uses on a nonconforming lot unless it is a legal lot. No building permits may be issued on an illegal lot. To correct most illegal lots requires a Conditional Certificate of Compliance and the conditions are not required to be feasible. Generally, consistency with the General Plan requires that the lot conform to the established minimum lot size. By setting the minimum lot size larger than most of the existing farms, the General Plan will require that illegal lot owners purchase adjacent land. If that land is not available or too expensive, the county may shut down the existing agricultural use and/or deny any new permits.

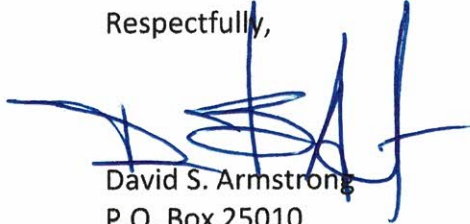
The General Plan sets minimum lot sizes larger than more than half of the County’s farms and larger than what the County determined was necessary for commercial viability. There is no analysis of how many farms may be impacted by these policies or how they could result in the conversion to non-agricultural uses.

The conversion to non-agricultural uses under CEQA is not predicated on establishing an alternative land use designation. Any use or having no use that results in stopping the

production of agriculture constitutes a conversion. The DEIR fails evaluate all potential impacts and must be rewritten and subsequently recirculated for review.

Thank you in advance for your consideration.

Respectfully,

A handwritten signature in blue ink, appearing to read 'D. S. Armstrong', with a large, stylized flourish extending to the right.

David S. Armstrong
P.O. Box 25010
Ventura, CA 93002

Simmons, Carrie

From: Figueroa, Isidro <isidro.figueroa@oxnard.org>
Sent: Thursday, February 27, 2020 4:39 PM
To: General Plan Update
Cc: Lambert, Jeffrey; Scott Kolwitz; Curtis, Susan
Subject: City of Oxnard_Comment Letter_2040 General Plan DEIR_County of Ventura
Attachments: City of Oxnard_Comment Letter_2040 General Plan DEIR_County of Ventura_02.27.20.pdf

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

Please accept the City of Oxnard's comment letter on the County of Ventura's 2040 General Plan DEIR.

Regards,

-Isidro

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Isidro Figueroa
Principal Planner
805-385-8207

Please visit us online: oxnard.org/planning

For Answers to Frequently Asked Questions visit our [FAQ](#) page

Jeffrey Lambert
Community Development Director
Community Development Department
214 South C Street
Oxnard, CA 93030
(805) 385-7882
jeffrey.lambert@oxnard.org



February 27, 2020

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 S. Victoria Ave., L #1740
Ventura, CA 93009-1740

**RE: City of Oxnard Comments on Analysis of Environmental Impacts for Draft 2040
General Plan**

The City of Oxnard (City) has received and reviewed the Draft Environmental Impact Report (DEIR) for the proposed County of Ventura (County) 2040 General Plan comprehensive update. The 2040 General Plan proposes to set forth the County's vision of its future and identify the goals, policies, and implementation programs that will guide future decisions concerning a variety of issues, including but not limited to land use, climate change, agriculture, transportation, hazards, public facilities, health and safety, environmental justice, and resource conservation out to the year 2040.

The City appreciates the opportunity to provide comments on the 2040 General Plan DEIR. The City is also appreciative of the ongoing working relationship and cooperation between the City and the County. The City looks forward to participating in the County's 2040 General Plan update process.

City of Oxnard DEIR Comments

City comments follow DEIR Sections as follows:

2.1 –Introduction

2.2.5- Structure and Content of the General Plan: Land Use Diagram

"Two changes are also proposed for lands within or adjacent to the incorporated cities in the county. As the County does not have land use authority over lands within the cities, these areas are noted as "City" on the 2040 General Plan Land Use Diagram and not given a land

use designation. The final land use designation change is the proposed removal of the Urban Reserve Overlay. This overlay is replaced by a policy that references the use of adopted spheres of influence to provide the same geographic boundary."

The City appreciates the County's efforts to clarify the relationship regarding land use authority between the County and surrounding cities by designating lands within the jurisdictional boundaries of surrounding cities as "City" in the Land Use Diagram. The new designation of "City" and the absence of a land use designation will clearly alert the general public that all lands with the designation are located within a city and that the general public should seek assistance from that appropriate city regarding all land use inquiries. Additionally, the City appreciates the County clearly stating that the County does not have land use authority over lands within the cities. The aforementioned statement will alleviate confusion to the general public about who is responsible for making land use decisions and will assist cooperation between surrounding cities and the County.

4.2 Agriculture

4.2.2 Environmental Impacts and Mitigation Measures

Mitigation Measures

Mitigation Measure AG-1: New Policy AG-X Avoid Development on Agricultural Land

The County shall include the following new policy in the 2040 General Plan.

Policy AG-X Avoid Development on Agricultural Land

"The County shall ensure that discretionary development located on land identified as Important Farmland on the State's Important Farmland Inventory shall be conditioned to avoid direct loss of Important Farmland as much as feasibly possible."

Mitigation Measure AG-2: New Implementation Program AG-X: Establish an Agricultural Conservation Easement

"The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program AG-X: Establish an Agricultural Conservation Easement

Applicants for discretionary projects that would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table below shall ensure the permanent protection of offsite farmland of equal quality at a 2:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement."

The City, California State Coastal Conservancy (CSCC) and The Nature Conservancy (TNC) (Project Partners) are currently undertaking the Ormond Beach Restoration and Access Plan (OBRAP). The OBRAP area encompasses approximately 630 acres that are entirely within the

City of Oxnard, as is a significant portion of the broader Ormond Beach area. Property outside the OBRAP, in the Eastern Ormond Beach area between Edison Drive and Arnold Road, is within the County. The County also maintains a portion of Arnold Road. The Ventura County Watershed Protection District manages Tsumas Creek, the Ormond Lagoon Waterway, and the Hueneme Drain, including a flood control easement along the Ormond Lagoon Waterway. These waterways traverse lands owned by TNC and the City within the OBRAP area. The OBRAP area and the broader Ormond Beach area also straddle both the County non-coastal and Coastal Zones.

Ormond Beach is considered by wetland experts to be one of the most important wetland restoration opportunities in southern California. Unlike other coastal wetland restoration projects in southern California, there is room to restore the approximate extent of historic wetlands, provide surrounding upland habitat to complete the ecosystem and accommodate sea level rise. When combined with the adjacent Mugu wetlands, it will be one of the largest wetland systems in Southern California. Currently public access is limited. This plan will create restoration alternatives and enhance public enjoyment of Ormond Beach. The Project Partners recently held a public workshop in August of 2019 to present the draft OBRAP to the community and stakeholders. A number of County department representatives participated in the public workshop and provided valuable comments. The Partners greatly appreciate the ongoing participation and assistance of the County during the development of the OBRAP.

Expansion of the project area may occur in the future as a result of new land acquisitions. The OBRAP has identified a few potential land acquisitions opportunities, some of which are located within the County boundaries. Based on Mitigation Measures AG-1 and AG-2, it would potentially require the Project Partners to provide permanent protection of offsite farmland of equal quality at a 2:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement. The City believes that the policy should be amended to exempt restoration and similar plans from this requirement. The City believes that restoration plans like the OBRAP that are intended to provide regional open space and coastal access opportunities for the general public, protection and further enhancement of vital ecosystems and protection from sea level rise should not be considered “discretionary development” (i.e. hardscape development) and required to provide permanent protection of offsite farmland of equal quality at a 2:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement.

4.6 Energy

The Energy chapter within the DEIR fails to establish a specific reduction target but references reduction mandates commensurate with State standards. By inference, reduction targets are stated as being able to be met. The analysis does not quantify how the reduction targets will be

met with the added housing units to be constructed over the life of the 2040 General Plan, inclusive of the Housing Element. Additionally, Chapter B (Climate Change) of the DEIR identifies reduction targets (see page B-13). The City recommends that these targets be quantified in the Energy section to demonstrate how reductions will be met and that the GHG citation and evaluation criteria for inventory (ICLEI 2013) be referenced in this section.

4.8 Green Gas Emissions

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.8-2: Conflict with an Applicable Plan, Policy, or Regulation for the Purpose of Reducing the Emissions of GHGs

Impact 4.8-2 (page 4.8-50) states, “the County cannot meaningfully quantify the effect of all its 2040 General Plan policies and programs on future GHG emissions, and there, it cannot conclude, at this program level of analysis, that future GHG emissions in the county under the 2040 General Plan would be sufficiently reduced to meet the State’s 2030 or post-2030 targets.” The City recommends that policies and implementation measures be prioritized with measures to achieve greater reductions identified. Prioritization will also assist the County when budgeting and evaluating competing priorities. This could also be replicated in Appendix B.

4.11 Land Use Planning

Section 4.11.2 – Environmental Impacts and Mitigation Measures

2040 General Plan Policies and Implementation Programs

Agriculture Element

Policy PFS-5.2: Land Use Compatibility with Solid Waste Facilities

“The County shall review and condition discretionary development near landfills and other solid waste processing and disposal facilities (including facilities for composting, green waste, food waste) to avoid incompatible development and future nuisance complaints from encroachment by incompatible land uses.”

The City recommends that language be incorporated to Policy PFS-5.2 that would not permit the extension of discretionary permits for existing development near landfills and other solid waste processing and disposal facilities (including facilities for composting, green waste, food waste) adjacent to or near: wetlands; restoration plan areas; and areas that contain environmentally sensitive habitat, including federally and state endangered and listed species. This policy will ensure that such facilities site their operations in the appropriate zoning. The new policy language will assist in the preservation and enhancement of unique environmental settings that are becoming frequently rare in the County and will provide for additional restoration and conservation opportunities throughout the County.

4.12 Mineral

Section 4.12.2 – Environmental Impacts and Mitigation Measures

2040 General Plan Policies and Implementation Programs

Mitigation Measures

Mitigation Measure PR-1: Revised Policy COS-7.2: Oil Well Distance Criteria

The County shall include the following revised policy in the 2040 General Plan.

COS-7.2: Oil Well Distance Criteria

“The County shall require that new discretionary oil and gas wells to be located be sited a minimum of 1,500 feet from the well head to residential dwellings dwelling units and 2,500 from any school sensitive use structures which include dwellings, childcare facilities, hospitals, health clinics, and school property lines.”

The City recommends that revised policy COS-7.2 continue to require that new discretionary oil and gas wells be sited a minimum of 2,500 feet to sensitive use structures which include dwellings, childcare facilities, hospitals, health clinics, and school property lines instead of the proposed 1,500 feet. The DEIR cites the recommendations contained within the Los Angeles County LACDPH, Public Health and Safety Risks of Oil and Gas Facilities in Los Angeles County report (February 2018) and the City of Los Angeles Oil and Gas Report (July 2019) as justification for recommending the setback reduction of new discretionary oil and gas wells to sensitive use structures from 1,500 feet to 2,500 feet. However, the DEIR fails to identify how the conditions and infrastructure analyzed in the aforementioned reports relate to the conditions and infrastructure found within the County, and if the reduction in setback is adequate based on the conditions found in the County. The City recommends that the County commission a study that analyzes current oil and gas conditions in the County and how the reduction in setback will impact sensitive use structures.

4.14 Population and Housing

4.14.2 Environmental Impacts and Mitigation Measures

Methodology

Section 4.14.2 of the DEIR states the following: “Affordable housing units are defined as moderate-income in the Coastal Zone and lower-income for the remainder of the plan area. (Lower-income is the term used to collectively refer to low-, very-low, and extremely-low income households.)” Please clarify how allowance of only moderate-income housing units in the Coastal Zone complies with State Housing Law. The allowance would have major implications on how the City and surrounding cities in the County comply with State Housing Law.

4.17 Utilities

4.17.1 Background Report Setting Updates

Environmental Setting

Table 4.17-1 Wastewater Treatment Capacity, Ventura County

Agency	Total Number of Connections	Rated Capacity (MGD ¹)	ADWF ² (MGD)	Treatment Level
County Service Area No. 29	307	N/A	0.085	Tertiary
County Service Area No. 30	274	N/A	0.2	Tertiary
County Service Area No. 32	N/A	N/A	N/A	N/A
County Service Area No. 34	1,364	N/A	N/A	Tertiary
Camarillo Utility Enterprise	57	N/A	0.0356	Tertiary
Todd Road Jail	N/A	0.08	0.044	Secondary
Ventura County Waterworks District No. 1	10,000 (37,000 population)	5	2	Tertiary
Ventura County Waterworks District No. 16	544 (2,000 population)	0.5	N/A	Secondary
Camarillo Sanitary District	70,000 (population, city and unincorporated)	7.25	4	Tertiary
Ojai Valley Sanitary District	20,000 (customers)	3	1.4	Tertiary
Saticoy Sanitary District	271	0.25	0.1	Secondary
Triunfo Sanitation District	12,300	16	9	Tertiary
Camrosa Water District	6,600	1.5	1.4	Tertiary
Channel Islands Beach Community Services District	1,800	N/A	N/A	N/A
City of Oxnard	40,000	32.7	17 20	Tertiary Secondary
City of Simi Valley	40,000 (527 unincorporated)	12.5	7.8	Tertiary
City of Thousand Oaks	130,000 (population)	14	8	Tertiary
City of Ventura	25,628	14	7.1	Tertiary

Please correct Table 4.17.1 Wastewater Treatment Capacity, Ventura County under agency for the City of Oxnard as follows:

Under the ASWF(MGF) column- please change the number 17 to 20.

Under the Treatment Level column- please change the word Tertiary to Secondary.

Thank you for the opportunity to comment on the DEIR. If you have questions, please feel free to contact me at (805) 385-7882 or e-mail jeffrey.lambert@oxnard.org.

Sincerely,



Jeffrey Lambert, AICP
Community Development Director

Simmons, Carrie

From: Matt Brady <legal@abaenergy.com>
Sent: Thursday, February 27, 2020 4:01 PM
To: General Plan Update
Subject: Comments on Analysis of Environmental Impact Report for Draft 2040 General Plan (State Clearinghouse #2019011026)
Attachments: DEIR 2040 Gen Plan Comment Letter on behalf of ABA Energy Corporation.pdf
Follow Up Flag: Follow up
Flag Status: Completed

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

Attn: Susan Curtis, Manager, General Plan Update Section

Please find attached the Comment Letter on behalf of ABA Energy Corporation

Mathew Brady

Mathew M. Brady
Vice President & General Counsel
ABA ENERGY CORPORATION
P.O. Box 80476
Bakersfield CA 93380-0476
(661) 324-7500, Ext 1007; Fax: (661) 324-7568



ENERGY CORPORATION

February 27, 2020

Sent Via Email Only - GeneralPlanUpdate@ventura.org

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 S. Victoria Ave., L #1740
Ventura, CA 93009-1740

RE: Comments on Analysis of Environmental Impact Report for Draft 2040 General Plan
(State Clearinghouse #2019011026)

Dear Ms. Curtis:

This letter provides comments on behalf of ABA Energy Corporation (“ABA”) on the analysis of the environmental impacts provided in the Draft Environment Impact Report for the Draft 2040 General Plan (“DEIR”). In addition to my general comments, I have also included a more specific set of detailed comments referencing specific sections of the DEIR.

For the last ten years my company, ABA, has been actively exploring for and producing oil and gas in the Oxnard Oilfield in Ventura County utilizing traditional recovery methods. We have worked cooperatively with the Ventura County Planning, Building, and Fire Departments, the Ventura County Air Pollution Control District, as well as the state regulatory agencies to conduct our operations for the mutual benefit of the farming families who own the minerals under their farm property and others, including ABA who have a vested interest in the minerals. We have invested tens of millions of dollars in our effort and generated significant tax revenue in the process. It is our intention to continue to conduct these lawful operations and drill additional wells in accord with the existing stringent laws, regulations, and rules that are among the most rigorous in the world. As a mineral resource lessee and a production operator in the County, ABA will be directly and substantially affected by the adequacy of environmental review undertaken in support of the 2040 General Plan as well as implementation of the 2040 General Plan.

The DEIR is deficient in many aspects and we respectfully request that the DEIR be significantly revised and recirculated, as required by the California Environmental Quality Act (Pub. Resources Code, §§ 21000 et seq) (“CEQA”) and the State CEQA Guidelines (Cal. Code Regs., tit. 14, §§ 15000 et seq.) (“CEQA Guidelines”). Given the DEIR’s failure as an informational disclosure document and its failure to identify and impose all feasible mitigation measures, the DEIR, in its current form, cannot support approval of the County’s proposed update to its current general plan (“2040 General Plan”). The DEIR’s legal deficiencies must be cured and it must be recirculated prior to any approval of the 2040 General Plan.

An EIR must be prepared with a sufficient degree of analysis to provide decision-makers with the information needed to make an intelligent judgment concerning a project's environmental impacts. 14 Cal Code Regs §15151. *Napa Citizens for Honest Gov't v Napa County Bd. of Supervisors* (2001) 91 CA4th 342, 356. An EIR should, when looked at as a whole, provide a reasonable, good faith disclosure and

analysis of the project's environmental impacts. *Laurel Heights Improvement Ass'n v Regents of Univ. of Cal.* (1988) 47 C3d 376, 392.

GENERAL COMMENTS

Replacing Locally Produced Oil with Imported Oil Will Increase, Not Reduce, Greenhouse Gases.

The term “Greenwashing” applies to organizations that disseminate disinformation and misleading claims so as to present an environmentally responsible public image when in fact their policies and products have the opposite effect. As a part of California’s push for environmental justice, several companies that have engaged in Greenwashing have even been sued by the Attorney General.¹ The County of Ventura appears to be engaging in Greenwashing by proposing policies that it touts will achieve a decrease in greenhouse gases (“GHG”), by eliminating locally produced, highly regulated, oil and gas production, when in reality these policies will cause an increase in GHG and other pollutants. While the DEIR acknowledges at pages 4.12-21 through 4.12-23 and 4.12-32 that these policies, as proposed, will result in increases in the importation of oil (i.e. more oil trains and oil tankers), there has been no effort to quantify the corresponding increase in GHG and other pollutants that will be the direct result of such policies or their impact on the environment. The abject failure of the DEIR to address the environmentally harmful effects of policies designed to push impacts outside the County Line (as if they will then magically cease to exist) is Greenwashing by any definition.²

In my 37-year career as a petroleum engineer, I have had the opportunity to participate in the exploration and production of oil and gas both domestically in various states and all over the world and as a result, I am familiar with the regulations that have been imposed on oil and gas production by various foreign and state governments as well as other jurisdictions within the State of California. The existing laws, rules and regulations in Ventura County that apply to oil and gas production are among the strictest I have experienced in my career. For example, the Ventura County Air Pollution Control District enforces strict air quality standards and air credit programs that have resulted in dramatically reduced emissions as compared to the emissions from oil and gas production from other states and certainly other countries. In addition, and as noted below in the detailed comments, not all oil is created equal when it comes to Carbon Intensity. The California Air Resources Board (“CARB”) publishes Carbon Intensity values for the various crude oil sources under their Low Carbon Fuel Standard Regulation. The most recent published data is from 2018 which demonstrates that the Carbon Intensity from the oil produced in the Oxnard Oilfield (where all of ABA’s production is located), on an annual average, is less than half the Carbon Intensity of the crude oil used in California as a whole during 2018 (5.39 vs. 12.35 gCO₂e/MJ).³ A quick look at this Carbon Intensity data also reveals that the Carbon Intensity of oil from Alaska was 15.91 gCO₂e/MJ and the Carbon Intensity of the blended average of oil from Saudi Arabia was 8.82 gCO₂e/MJ.

Drop per drop, barrel per barrel, simply replacing locally produced Ventura County oil with imported oil will result in an increase in GHG, and that is true even before considering the huge environmental impacts associated with the GHG and other pollutants generated in the process of shipping that replacement oil across the world (not to mention the increased risks associated with oil spills). Simply put, the DEIR is

¹ <https://oag.ca.gov/environment/greenwashing>

² <https://foe.org/alaskan-arctic-california-crude/>; <https://www.forbes.com/sites/chuckdevore/2019/10/07/californias-next-offshore-oil-spill-will-be-caused-ironically-by-the-states-war-on-oil/#652f8fbb6535>

³ https://ww3.arb.ca.gov/fuels/lcfs/crude-oil/2018_crude_average_ci_value_final.pdf

deficient because it fails to quantify in any meaningful way, using readily available data, the increases in GHG and other pollutants that will be caused if the new policies inhibiting new oil and gas production presently contained in the 2040 General Plan are implemented. The failure of the County to “come clean” by providing a meaningful GHG analysis of its decision to favor imported oil over cleaner, highly regulated, locally produced oil, renders the DEIR inadequate as an informational disclosure document, as a matter of law.

The Proposed 1,500’/2,500’ Setback for New Discretionary Oil and Gas Wells is an Unmitigated Taking that is Not Supported by Substantial Evidence.

Policy COS-7.2 as proposed would require that new discretionary oil and gas wells be located a minimum of 1,500 feet from residential dwellings and 2,500 feet from any school. In support of these drastic setback requirements, the County failed to conduct any analytical studies demonstrating why the current setback (500’ and 800’) in combination with routine mitigation requirements (i.e. sound walls during drilling and workover operations) in combination with current air quality restrictions including vapor recovery for all facilities and zero emission tolerances are inadequate. The DEIR acknowledges that the VCAPCD conducts quarterly inspections of oil and gas facilities to enforce the zero emissions policy and it is unclear from any information why such current mitigations are inadequate. The DEIR fails to cite any air monitoring study, any noise study, any vibration detection study, or any odor study conducted in like or similar conditions to support its conclusion that a change in setbacks for oil and gas wells would in any way change a single environmental impact for sensitive receptors or otherwise.

Rather than rely upon actual data and analysis to support Policy COS-7.2, the DEIR relies heavily on a report by the Los Angeles County Department of Public Health issued in February of 2018 entitled: “Public Health and Safety Risks of Oil and Gas Facilities in Los Angeles County” (“LA County Report”). Such reliance is misplaced as the LA County Report fails to supply any actual data or analysis that is applicable to the circumstances at issue in the Ventura General Plan area. First, the basis of the study was to address public health and safety concerns related to oil and gas reserves that “lie beneath densely populated urban areas” which are the exact opposite of the areas currently available for new oil and gas wells in unincorporated Ventura County. Second, the LA County Report concluded, “the epidemiological studies are not able to conclude whether or not living near oil and gas activities is associated with long-term health impacts.” Third, neighborhood health investigations were conducted in support of the report, which demonstrated low risk levels for risks associated with hydrogen sulfide gas, operating pressures, and drilling frequency but six out of the 15 facilities they inspected had oil wells or tanks within 300 feet of residences or sensitive receptors which has no bearing on the current regulations for new wells in Ventura County.

No independent studies were conducted to determine actual setback criteria with and/or without mitigation measures. Rather, the study group looked at Seven (7) EIRs and Two (2) Health Impact Assessments plus one (1) study from Colorado, none of which related to oil and gas development in unincorporated Ventura County under existing setback requirements and emission controls that are applicable currently to new discretionary oil and gas wells in Ventura County. The LA County Report concluded that most of impacts could be mitigated, but it is unclear from this report upon what data and under what circumstances they based any of their findings. For example, even though they found little or no evidence of odors that were directly related to hydrogen sulfide (H₂S) that is associated with certain oil fields, they suggested imposing an additional 500-foot set back regardless of whether H₂S was known to be a problem in that oil field. Further, regarding their recommendation for setbacks to address noise issues, they failed to address the effect of routine mitigation measures that are employed during drilling operations. Simply put, the LA

County Report fails to provide substantial evidence to support the proposed increase in setback requirements for new discretionary oil and gas wells. The DEIR begrudgingly acknowledges that in July of 2019 the City of Los Angeles rejected the findings in the LA County Report and adopted a 600-foot setback for new oil and gas wells.

While the DEIR does reference a couple of other studies, the record is clear that none of the other studies cited in the DEIR, were conducted in Ventura County under conditions similar to or approximating the existing regulatory conditions to which a new discretionary oil and gas well would be subject. There is simply an absence of relevant data or a sufficient degree of analysis to provide decision-makers with the information needed to make an intelligent judgment concerning such a dramatic change in the setback requirements for new discretionary oil and gas wells.

It is worth noting that if Policy COS-7.2, (with mitigation measures or not) were adopted, a farmer who conducts farming operations utilizing diesel tractors and other heavy equipment, spraying pesticides, herbicides, and fertilizers, and otherwise engaging in dusty, noisy, routine farming immediately adjacent to sensitive receptors, would at the same time be completely precluded from developing the minerals on his property within 1,500 feet of those same sensitive receptors, even though such oil and gas development could be conducted in a manner that imposes little or no impacts on those same sensitive receptors. The application of an artificial setback requirement for which there is no actual scientific or other supporting data is illegal, is being applied in a punitive manner, and such loss of the rightful use of the farmer's property would be an unconstitutional taking, a fact that appears to be acknowledged in the DEIR.

Like Most Businesses, Trucking is the Only Feasible Method of Getting Our Product to Market.

Like most businesses in Ventura County that produce a product (i.e. farming, manufacturing, or other industries), the only feasible method for our company to get its product to market is to utilize trucking. Policy COS-7.7, as proposed, fails to address any other industry, but singles out oil production for some special mistreatment. Interestingly, this policy attacks only trucking to a refinery, but exempts from regulation the trucking of the finished petroleum product from that same refinery back into the community. There is no scientific or other basis that supports this disparate treatment such that the only logical conclusion is that it has been proposed as a punitive measure which is unconstitutional. As noted above, if the purpose of the Policy is to diminish Ventura County oil and gas production, the end result is an increase in GHG and other pollutants. Until the volume of oil production justifies the significant environmental impacts and costs associated with the construction and maintenance of new oil pipelines, trucking is the only feasible method of getting our product to market. Unless modified, Policy COS-7.7 will result in the inability to drill new discretionary oil and gas wells, which would cause economic harm to the mineral owners and other vested rightsholders, who intend to drill new discretionary oil and gas wells and it will result in an increase in GHG and other pollutants. The DEIR fails to include substantial evidence concerning the impacts to environment caused by the need to construct and maintain multiple new oil and water pipelines.

In Some Locations, Flaring of Natural Gas is the Only Feasible Option.

Policy COS-7.8 would require that natural gas produced from new discretionary wells be collected and used or removed for sale without flaring. ABA has expended much time and resources attempting to develop a sales market for the natural gas that is produced with its oil production. Unfortunately, despite our best hopes, none of the proposed compressed natural gas ("CNG") or liquid natural gas ("LNG") options we have investigated have come close to achieving a viable plan to take the natural gas we produce and

transport it in an environmentally and economically feasible manner for delivery to a stable, sustainable market. Although we are prohibited from sharing data concerning our efforts, we have also determined that delivering natural gas from our operation into a local utility line was not feasible regardless of the distance to the nearest utility pipeline. The remaining feasible option for most of our existing natural gas is to flare it in accord with the permits issued by the VCAPCD. To that end we have expended significant sums to obtain a BACT flare that has significantly diminished (>90%) the emissions from the flaring process and we participate in the air credit program administered by the VCAPCD (neither mitigation is considered in the DEIR). In other words, we have taken all feasible steps to mitigate the impacts of our production, which does not occur with most imported oil. Unless modified, Policy COS-7.8 would result in the inability to drill new discretionary oil and gas wells, which would cause economic harm to the mineral owners and other vested rightsholders, who intend to drill new discretionary oil and gas wells and it will result in an increase in GHG and other pollutants as well as constitute an unconstitutional taking of vested rights.

The DEIR Fails to Include an Economic Study or Address the Physical Changes to the Environment Caused by the Loss of Tax Revenue Resulting from Proposed Changes to Oil and Gas Policies.

The physical changes to the environment caused by the loss of tax revenue from diminished oil and gas production are significant and need to be addressed in the DEIR. While economic and social effects ordinarily need not be discussed in an EIR, physical changes to the environment caused by a project's economic or social effects are secondary impacts that must be included in an EIR's impact analysis if they are significant. (14 CCR §15064(e)). An EIR may trace the effects of economic or social changes resulting from a project to physical changes caused by the economic or social changes. (14 CCR §15131(a)). Under this rule, a social or economic effect resulting from a project may be found to cause a significant physical impact that must be analyzed in the EIR. See *Bakersfield Citizens for Local Control v City of Bakersfield* (2004) 124 CA4th 1184, 1215 (EIR improperly dismissed possibility that large shopping center could drive other retailers out of business as an economic effect when urban decay and other blight-like conditions could result); *El Dorado Union High Sch. Dist. v City of Placerville* (1983) 144 CA3d 123 (while increased student enrollment and potential for overcrowding by itself is likely insufficient to implicate CEQA, such effects are relevant when they will lead to construction of new facilities). See also *City of Hayward v Board of Trustees of Cal. State Univ.* (2015) 242 CA4th 833, 842 (EIR properly analyzed potential environmental impacts of constructing new fire station needed to serve project while also recognizing that cost of meeting increased need for fire protection services is economic impact).

The County of Ventura relies on tax revenue for its annual operating budget that includes significant tax revenue resulting from the drilling of new oil and gas wells. In fact, until there is a successful oil and gas well drilled, the mineral estate is not taxed and is not even included in the evaluation of property taxes. Operators of oil and gas properties, such as ABA, are required to provide data concerning new wells to the County Tax Assessor in order for each new well to be assessed for property tax purposes. The policies in the Draft 2040 General Plan attacking future oil and gas production will preclude mineral owners and their lessees from drilling new wells thus condemning the property (an unconstitutional taking) and cause the County to lose the property tax revenue that would have otherwise been generated had the minerals from such property been developed. Further, oil and gas development generates significant direct sales tax revenue and secondary revenue from employees, contractors and vendors all of which will be lost if the policies designed to inhibit future oil and gas development are adopted.

Even a cursory review of Section 5 of the Draft 2040 General Plan which addresses Public Facilities, Services, and Infrastructure reveals that any loss of funding for the essential facilities, services and

infrastructure the County provides would likely cause a physical change to the environment that would threaten the very existence of the citizens, homes, businesses, farms, open space and wildlife in Ventura County. Tight county budgets are already a reality with departmental belt tightening being the norm. For example, a loss of mineral tax revenue and associated sales tax revenue will further strain the budget of the Ventura County Fire Protection District (“VCFPD”) that provides fire protection in the unincorporated areas of the County along with various cities. A review of the Budget for the VCFPD for 2017-18 reveals that of the \$178,618,708 annual budget, property taxes (\$133,586,989) accounted for nearly 75% of the total budget. A cut in property taxes due to policies hindering oil and gas production will result in a drop in funding that will make the VCFPD less prepared to prevent and defend future wild fires to which the County of Ventura is already susceptible. Wild fires cause physical change to the environment which is significant and therefore an economic study must be conducted to determine the impacts caused by the loss of oil related tax revenue in this DEIR. Similarly, there are many other physical changes to the environment that are significant that could result from a lack of funding for the County services we rely on to protect the environment and if there is a deterioration of funding due to lack of oil related taxes, these direct and indirect effects must be included as a part of an economic study to provide decisionmakers with the information necessary to determine the significance of the impacts causing physical changes to the environment. The data to conduct such a study remains in the possession of the County which should be able, with little effort to determine, for example, how much of Ventura County’s budget is derived from property taxes on minerals? How much will Ventura County lose in tax revenue by implementing new policies that discourage or eliminate the drilling of new wells? How much sales tax revenue will be lost that is associated with drilling, maintaining oil and gas wells? How will this loss of revenue impact the Public Facilities, Services and Infrastructure described in the 2040 General Plan Section 5?

Ventura County’s Effort to Ban New Oil and Gas Wells Violates the Law

The DEIR relies upon legally infeasible policies proposed in the 2040 General Plan that have as their direct and indirect goal, the elimination of oil and gas exploration and production in Ventura County. These proposed Policy changes, as described herein, affecting new oil and gas wells are infeasible in that they will result in a ban on new drilling, which conduct by the County is preempted by state and federal law, is unconstitutional, violates equal protection under the law, is discriminatory as a matter of law, and constitutes a taking. ABA reserves all of its rights to pursue every available remedy resulting from the attempt by Ventura County to ban future oil and gas exploration and production in Ventura County.

DETAILED COMMENTS

ABA’s specific and detailed comments on the individual chapters and sections of DEIR are set forth below.

- 4.8-25** Without acknowledging the existing ad valorem taxes on oil that are paid to the County, the County is now proposing to evaluate the whether to establish another local tax on oil and gas operations. The DEIR states that increased taxes on oil and gas facilities may reduce GHG emissions which assertion is unsupported by substantial evidence. Further, as noted above, if an additional tax resulted in diminished oil and gas production, the result would be an increase in GHG and other pollutants as noted above. As other stationary sources contribute as much or more GHG, the County appears to be arbitrarily burdening a single industry sector by increasing taxes with no regard to the data presented in the DEIR

- 4.12-8** Policy COS 7.3. To the extent the County seeks to impose this Policy on new wells drilled subject to an existing and valid special use permit, such policy unlawfully impairs vested property rights and disregards well-settled controlling law concerning a mineral owner's right to recover resources from his or her sub-surface property and constitutes a taking under state and federal law. All analyses and assumptions flowing from the expected imposition of this policy are fatally flawed.
- 4.12-8** Policy COS 7.7. This policy is preempted by state and federal regulations. The DEIR disregards this. All analyses and assumptions flowing from the expected imposition of this policy are fatally flawed and not supported by substantial evidence. See the discussion under the General Comments.
- 4.12-12** As noted in the General Comments, as to Policy COS-7.3, there is no substantial evidence provided to justify an increase in the minimum setback requirements for new discretionary oil and gas wells or otherwise demonstrate why the existing setbacks are inadequate. Further, the imposition of such new setbacks will result in an unconstitutional taking. See the discussion in the General Comments regarding the inadequacy of the LA County Report.
- 4.12-13** Reliance on the CCST study is misplaced as it fails to address the existing standards, conditions, setbacks, and mitigation requirements that are in place in Ventura County and presently applicable to new discretionary oil and gas wells; a fact that the study acknowledges by stating that actual exposures and any related health impacts may be different and "have not been measured." In light of the stated deficiencies the CCST study is not sufficient evidence to support a change in the current setback requirements for new discretionary oil and gas wells.
- 4.12-13** Reliance on a University of Maryland study that purportedly (the study is no longer available on the U of M website) addressed fracking natural gas wells in the Marcellus Shale, completely fails to address the existing standards, conditions, setbacks, and mitigation requirements that are in place in Ventura County and applicable to new discretionary oil and gas wells. In light of the complete absence of relevance to existing conditions, the purported University of Maryland study is not sufficient evidence to support a change in the current setback requirements for new discretionary oil and gas wells.
- 4.12-14 through 4.12.18** See the General Comments regarding COS-7.2
- 4.12-18 through 4.12-20** Mitigation Measure PR-1 for Policy COS-7.2 is a tacit recognition that there is no substantive evidence to support the proposed 2,500-foot setback included in Policy COS-7.2. Mitigation Measure PR-1's continued reliance on the LA County Public Health Report referenced in the General Comments to support a 1,500-foot setback rather than the 600-foot setback adopted by the City of Los Angeles in July of 2019 demonstrates that this proposed policy is not driven by science, any true analysis, or the facts. As noted in the General Comments, LA County Public Health conducted no studies to measure actual conditions and certainly did not take into consideration the current conditions in Ventura County including the existing regulatory

and mitigation measures in place before they picked numbers out of a hat or otherwise guessed how far away you had to be to not smell H₂S. For oil fields in Ventura County that do not have H₂S, that is absolutely no evidence to support the final 500-foot setback reference in the LA County Public Health Report. That being said, there is no substantial evidence in the record to justify the setback language in Mitigation Measure PR-1 for Policy COS-7.2, however a 600-foot setback as adopted as adopted by the City of Los Angeles seems reasonable.

4.12-21 The DEIR's unsupported conclusions regarding horizontal drilling access are demonstrably false. The DEIR states that: "[w]hile the amended policy would put limitations on the placement of new discretionary oil and gas wells, it would not necessarily prohibit access to the oil and natural gas resources being sought. In resource locations near sensitive land uses, directional drilling (including horizontal drilling) techniques could be utilized. . . ." Ample evidence, readily available to the DEIR preparers, disproves the foregoing. Oilfields in Ventura County contain multiple oil sands vertically stacked in a compact manner. Accordingly, an additional offset of 1,500' would in most drilling cases either render the geological angle of attack moot, in that a well might ostensibly never be able to mechanically reach all of its targets, or, due to the foregoing, an operator might be required to drill multiple wells to achieve the same production, leading to a significant increase in impacts compared to a single well drilled to accomplish the same geologic goals. Directional drilling would not be possible to replace all of the reserves/resources due to terrain surrounding this area limiting surface locations as well the reservoir structural need to drill north-south directional paths from east or west locations.

4.12-21 through 4.12-23 The DEIR concedes that the majority of the COS policies to be adopted as part of the proposed GP 2040 are adopted for the express purpose of phasing out local oil and gas production within the County. The DEIR further concedes that the County will, as a direct result of this proposed phase-out, need to import foreign sources of oil and gas, and further acknowledges that the importation of such sources will have a more severe GHG production impact than reliance on local oil and gas resources. The DEIR then unlawfully punts on consideration of that more severe impact by stating that those impacts will occur "outside the GP 2040 plan area." This abdication of responsibility for GHG analysis is not only hypocritical given GP 2040's objective of combating climate change, but also unlawful. The more severe GHG impacts associated with the Importation of foreign oil and gas are known and must be considered now. To omit this evaluation is to deprive the public and decision makers of the ability to fully and fairly understand and consider the impacts of adopting GP 2040. See also the discussion of this in the General Comments.

4.12-26 The issues arising out of the requirement that produced water not be disposed of via trucking are the same as those discussed in the General Comments regarding trucking.

4.12-27 COS Policy 7.8. This policy is not only preempted, but is also inconsistent with VCAPD rule 54 as it notes that all new well gas would be piped through the same gathering system in existing fields. Outside of running a new pipeline to a different gas processing system, there would be no way to break out the gas from the general field production that goes through the

current gathering system through the gas plant, sales point, or flare. See the comments on the use of flares contained in the General Comments.

4.12-32 In balancing the competing environmental, economic, social and other issues relating to Mitigation Measures PR-2 and PR-3, the County should also consider the significant increases in GHG and other pollutants that will result if the County chooses imported oil with all of its associated risks and ramifications as compared to the cleaner, heavily regulated, locally produced oil that keeps workers employed and increased revenues in the County budget.

4.13-1 through 4.13-29 The DEIR makes numerous, unsupported assumptions regarding the noise generated by oil and gas operations. Oil and gas operations generate noise equivalent to other industrial uses.

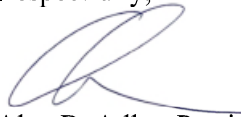
The DEIR does not, and cannot, provide evidence demonstrating that oil and gas production generates noise above and beyond the noise levels generated by industrial activities, let alone that it produces objectionable noise.

4.13-23 The discussion under Impact 4.13-4 lists oil supply facilities among major industrial noise sources. No substantial evidence exists in the DEIR or in the Background Report it references. Most oil supply facilities are located in areas far from sensitive receptors except to the extent that the County has permitted new development of sensitive receptors near oil supply facilities.

ABA hereby adopts and relies upon the comments to this DEIR contained in comment letters filed on behalf of all other oil and gas producers and oil industry associations that have provided comment letters as though such comments are fully set forth herein and as such they are incorporated herein by reference.

I look forward to working with County staff and the community to achieve a workable 2040 General Plan once this DEIR is rewritten to address the significant flaws referenced herein and the document is recirculated for further review and comment.

Respectfully,



Alan B. Adler, President

Simmons, Carrie

From: Adam Harper <aharper@calcima.org>
Sent: Thursday, February 27, 2020 4:01 PM
To: General Plan Update
Subject: CalCIMA Comments - Ventura General Plan Update EIR
Attachments: CalCIMA Comment Letter Ventura General Plan Mineral Resources.pdf

Follow Up Flag: Follow up
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Susan,

Thank you for confirming the General Plan comment deadline. Attached please find CalCIMA's comments.

Adam Harper
Director of Policy Analysis
CalCIMA
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aharper@calcima.org

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**California Construction and
Industrial Materials Association**

February 27, 2020

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 S. Victoria Ave., L #1740
Ventura, CA 93009-1740

Via e-mail: GeneralPlanUpdate@ventura.org

RE: Ventura County General Plan – Mineral Resources – Draft EIR Comments

Dear Mrs. Curtis:

These comments are offered on behalf of the California Construction and Industrial Materials Association (CALCIMA). CALCIMA is a statewide trade association representing construction and industrial material producers in California. Our members supply mineral resources such as construction aggregate inclusive of sand, gravel, crushed stone, slag, and recycled concrete that build our state's infrastructure, including public roads, rail, and water projects; help build our homes, schools and hospitals; assist in growing crops and feeding livestock; and play a key role in manufacturing wallboard, roofing shingles, paint, low energy light bulbs, and battery technology for electric cars and windmills. Our members develop mineral resources to provide the raw materials necessary to maintain society, and strategically site their operations throughout the state to minimize air quality impacts and greenhouse gas emissions associated with transportation by truck.

The Draft EIR for the Ventura County 2040 General Plan Update fails to give non-oil and gas mineral resources appropriate attention and analysis for impacts. As such the DEIR is deficient and should be corrected as we detail below. Once corrected, the DEIR should be recirculated for public review.

Incomplete Regulatory Setting

Neither the DEIR nor the Background report provide a complete and thorough description of the existing, current regulatory setting that oversees the management and production of mineral resources in the County and the State of California. This omission is particularly concerning because the existing General Plan discusses many of these regulatory schemes in great detail, along with the importance of mineral resources, generally, and the mineral resources located in the County, specifically. The EIR and the Background Report only disclose federal and state agencies that regulate pipelines and flaring, which is not applicable to all mineral resources that must be analyzed in an EIR under the CEQA guidelines. The EIR should be revised to include an overview and description of all potential regulations, regulatory bodies, and programs that regulate mineral resources in Ventura County.

Further, the deletion of policies from the previous general plan which are part of the current regulatory environment and whose removal may negatively impact mineral resources is not included in the current

regulatory background. Nor is their removal analyzed or quantified. Specifically, existing General Plan Policy 1.4.2 #6 "All General Plan amendments, zone changes, and discretionary developments shall be evaluated for their individual and cumulative impacts on access to and extraction of recognized mineral resources, in compliance with the California Environmental Quality Act," is not included in the revised general plan. Nor is any analysis of how that removal could affect mineral resources, or any explanation for why it's being removed. We remind you that mineral resources are part of the "environment" protected by CEQA.

"Less than Significant" Impact Determination Not Supported

The EIR fails to provide any discussion of non-oil and gas mineral resources in the "environmental setting" discussion in section 4.12 of the EIR. Without an understanding of the regulatory and environmental setting, there is simply no information or data in the EIR to support the County's outright dismissal of impacts to mineral resource production as "less than significant."

Further, the EIR fails to actually analyze for direct and indirect impacts to mineral resource zones that will occur as a result of the 2040 General Plan. The County admits that Land Use Designation changes in the 2040 General Plan will result in changes to land uses over known and important mineral reserves. But neither the EIR nor the Background Report provide any information regarding estimated and anticipated "buildout" in terms of acreage, actual location, number of dwelling units, and development density and intensity. These incompatible land uses will significantly impact future mineral resource production and must be evaluated and mitigated for in the EIR.

Finally, the determination of impacts on page 4.12-10 is not only completely unsupported, but it is contradicted in the EIR's language. The EIR admits that residential and industrial uses will be installed in the MRZ-2 zone (a major mineral resource zone), but then never provides any quantification of impacts or discusses the extent, location, or intensity of the development within the MRZ-2 zone. This impact is not "less than significant" as development over the MRZ-2 zone will significantly hamper access to these resources. The County's analysis is contrary to ISAG threshold of significance 1., which states that, "Any land use or project activity which is proposed to be located on or immediately adjacent to land zoned Mineral Resource Protection (MRP) overlay zone, or adjacent to a principal access road to an existing aggregate Conditional Use Permit (CUP), and which has the potential to hamper or preclude extraction of or access to the aggregate resources, shall be considered to have a significant adverse impact on the environment."

Direct and Indirect Impacts Not Analyzed Or Quantified

The EIR concedes that more than half of the project area to be impacted by the 2040 General Plan is zoned MRZ-3a/b. The County admits in the EIR that areas zoned MRZ 3a/b are those areas with known mineral deposits that lack sufficient detailed information to be labeled MRZ-2. But the EIR fails to conduct any impact determination or analysis of the project on these mineral resources and deposits.

The EIR never addresses indirect impacts to mineral resource development that will occur under the 2040 General Plan. As incompatible land uses (such as residential development) occur on or adjacent to mineral production and mineral reserves, compatibility conflicts will increase. Reasonably foreseeable indirect impacts include nuisance complaints, traffic conflicts, theft, vandalism and attempted trespass on mineral production sites. The EIR must analyze and evaluate these impacts on the ability to produce mineral resources in the County.

We appreciate the opportunity to provide comments.

Respectfully,



Adam Harper
Director of Policy Analysis

Simmons, Carrie

From: Kroll, Chris@SCC <Chris.Kroll@scc.ca.gov>
Sent: Thursday, February 27, 2020 4:09 PM
To: General Plan Update
Subject: DEIR for Ventura County 2040 General Plan
Attachments: DEIR 2040 General Plan Comment Letter 2-20.pdf

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Attached is a comment letter from the Coastal Conservancy.

Please let me know if any questions.

Thank you.

Christopher Kroll
Project Manager
State Coastal Conservancy
1515 Clay, 10th Floor
Oakland Ca 94612
510 286 4169
Chris.Kroll@scc.ca.gov



SENT VIA EMAIL

February 27, 2020

Ventura County Resource Management Agency
Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 S. Victoria Avenue, L #1740
Ventura, CA 93009-1740

Re: DEIR for Ventura County 2040 General Plan

Dear Ms. Curtis:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the County's General Plan update. The Coastal Conservancy has been involved in planning and funding habitat restoration, public access and other projects in Ventura County for several decades.

Our comments relate to Section 4.2 Agriculture and Forestry. The DEIR identifies potential impacts and mitigation measures for agricultural resources. Specifically, the DEIR identifies Impact 4.2-1: Loss of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance (4.2-9) and two mitigation measures which would be added to the General Plan. These policies call for avoidance of direct loss of farmland and call for mitigation of loss at a 2:1 ratio through the establishment of an offsite agricultural conservation easement.

The Coastal Conservancy is currently working with local partners at Ormond Beach and on the Satna Clara River to develop and implement habitat restoration and public access plans for those areas. Ormond Beach, an area with especially important coastal wetland habitat, has been identified as being very much at risk from sea level rise. As a consequence, the Coastal Conservancy, The Nature Conservancy, and the City of Oxnard have been looking to acquire neighboring agricultural properties to allow the dunes, wetlands, and uplands to migrate inland as sea level rises. These properties would transition from agriculture to these threatened coastal habitats which would ensure the survival of the Ormond Beach wetlands complex and would act to provide a buffer to neighboring communities in South Oxnard at risk from sea level rise.

1515 Clay Street, 10th Floor
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510-286-1015 Fax: 510-286-0470



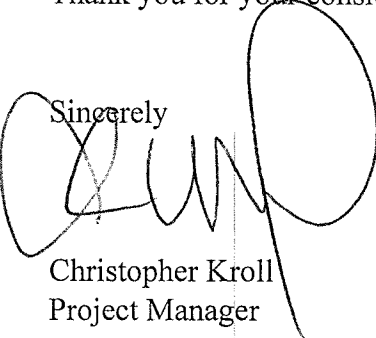
Similarly, the Coastal Conservancy has been funding the acquisition of thousands of acres of river-fronting land by The Nature Conservancy along the Santa Clara River since 2001 for ultimate habitat restoration and public access purposes to realize a Santa Clara River Parkway from the mouth of the river to the county line. The river is one of the last largely free flowing coastal rivers in southern California. But many areas have been encroached upon by development and adversely impacted by invasive non-native species such as *Arundo donax*. The Nature Conservancy has acquired some properties intended for habitat restoration and public access which currently support agriculture.

The proposed mitigation measures mentioned above may add significant additional costs and hurdles to implementing long-range planning for habitat restoration at Ormond Beach and along the Santa Clara River. These costs may be prohibitive to moving forward with implementing restoration plans for these areas.

We recommend that the County include exclusions to the above referenced mitigation measures for habitat restoration projects and related public access projects such as outlined above at Ormond Beach and the Santa Clara River.

Thank you for your consideration. Please contact me if I can provide additional information.

Sincerely



Christopher Kroll
Project Manager



Deanna Haines
Director of Policy, Strategy and Environment

Southern California Gas Company
Strategy & Engagement
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Los Angeles, CA 90013

Tel: 213.244.3010
Mobile: 213.220-1121
DHaines@socialgas.com

Susan Curtis
Manager, General Plan Update Section
Ventura County Resource Management Agency, Planning Division
800 South Victoria Avenue, L #1740
Ventura, CA 93009-1740

RE: County of Ventura – Draft 2040 General Plan Update EIR

Dear Ms. Curtis,

Southern California Gas Company appreciates the opportunity to submit comments on the Draft 2040 General Plan EIR (“DEIR”) and believes the document will provide valuable direction for the County to pursue effective, long-term development goals, as well as enhance local sustainability objectives. In particular, we support proposed policies that encourage beneficial reuse of County-generated waste for energy generation. Such policies have great potential to help reduce County GHG emissions, especially from agriculture and human waste streams.

However, SoCalGas is concerned by one of the County’s proposed mitigation measures: MM GHG-1: New Implementation HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development:

Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development – To support the proposed reach codes under COS-S, the 2040 General Plan shall include a new program in the Hazards and Safety element that prohibits the installation of new natural gas infrastructure in new residential construction through amendments to the Ventura County Building Code. This program shall also be extended to include commercial building types such as offices, retail buildings, and hotels where the use of natural gas is not critical to business operations and contain appliances that can be feasibility substituted with electricity powered equivalents.” (pg. 4.8-45-46).

While we support the County’s attempt to reduce emissions associated with buildings, this mitigation measure is technology-restrictive, may actually increase emissions and will limit the County’s ability to explore other innovative approaches to achieve emissions reductions in the future without deleveraging residents and businesses to hedge themselves against climate risks such as wildfires and household rising energy costs.

This type of ban would contravene California state law and policy as it relates to the availability of natural gas as a resource for residents and to the provision of a reliable and resilient energy supply. In addition, such a ban raises concerns under federal law.

Further, the DEIR's analysis and treatment of MM GHG-1 is legally flawed under the California Environmental Quality Act ("CEQA"). First, the DEIR fails to consider, discuss or analyze the environmental effects of implementing MM GHG-1. Second, the County cannot rely on MM GHG-1 to mitigate GHG impacts caused by the 2040 General Plan because MM GHG-1 is "infeasible" under CEQA. Lastly, by finding that climate change impacts would remain significant and unavoidable even with implementation of MMs GHG-1 through GHG-3, the County has neglected to consider other GHG emission reduction strategies as potential mitigation in the DEIR.

1. The DEIR Fails to Analyze the Environmental Impacts Associated with MM GHG-1

CEQA Guidelines section 15126.4(a)(1)(D) provides that, if a mitigation measure would itself cause significant environmental impacts, those impacts must be discussed in the EIR.¹ Here, the DEIR discusses what MM GHG-1 would consist of (*i.e.*, implementation of programs to prohibit natural gas infrastructure in new residential development, otherwise known as "Reach Codes"), notes that MM GHG-1 would implement Policy COS-8.6, which "will encourage zero net carbon emissions building design, which was assumed for quantifying GHG reduction benefits of the program", and states that implementation of a Reach Code will be predicated on a "cost-effectiveness study" by the California Energy Commission ("CEC").² However, the DEIR fails to discuss the potential environmental effects from implementing a Reach Code that bans or restricts natural gas in residential and/or commercial buildings.

Substantial evidence indicates that adopting and implementing MM GHG-1 and Reach Codes could lead to the following significant environmental impacts under CEQA.

- ***Utilities and Service Systems*** – In the CEQA Guidelines Appendix G checklist,³ section "XIX. Utilities and Service Systems" asks whether proposed projects would "[r]equire or result in the relocation or construction of new or expanded water, wastewater treatment or storage drainage, *electric power*, ... facilities, the construction or relocation of which *could* cause significant environmental effects."

¹ 14 Cal Code Regs. § 15126.4(a)(1)(D); *see also Sacramento Old City Assn. v. City Council* (1991) 229 Cal.App.3d 1011, 1027; *Stevens v. City of Glendale* (1981) 125 Cal.App.3d 986; *Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 400 (mitigation measures employed to prevent downstream flooding associated with reservoir project may themselves have a significant environmental impact, but was not analyzed); *Gray v. Cty. of Madera* (2008) 167 Cal.App.4th 1099, 1118 (EIR did not address potentially significant impacts associated with water quality mitigation measures).

² DEIR at 4.8-47.

³ *See* Governor's Office of Planning and Research, Final Adopted Text of Revisions for CEQA Guidelines, http://resources.ca.gov/ceqa/docs/2018_CEQA_FINAL_TEXT_122818.pdf.

Adoption and implementation of a Reach Code would require new buildings to either be all-electric or, if mixed-fuel, likely subject to higher levels of energy efficiency than all-electric buildings. It is reasonably foreseeable that some developers will choose to develop buildings with all-electric energy, which will increase the demand for electricity; however, there is no analysis in the DEIR as to whether (i) the local grid has the generating resources and capacity to meet such increased demand for electricity, or (ii) whether the local public utility or load-serving entity has sufficient distribution or transmission assets to provide increased service in a safe and reliable manner.⁴ The DEIR fails to quantify increased electricity demand, how many additional generation, distribution or transmission assets may be needed to facilitate this increased demand, or how the construction or relocation of such assets could impact the environment.⁵

The need to substantially overbuild local power systems when natural gas is not used as a base load means that a much greater amount of land, habitat and related physical resources will be impacted by solar and wind generation facilities. In a scenario where natural gas is banned across the state, new solar arrays and wind farms will need to be fabricated, transported to, and installed throughout California at more than five times the historical rate of deployment every year for the next 25 years.⁶ This deployment will significantly impact the physical environment across California. The fabrication, transportation and construction of the required generation facilities will also generate GHG emissions that would have cumulative climate change impacts.

In addition, as more electric energy is utilized new transmission capacity must be fabricated, transported to and installed throughout the state to connect with thousands of miles of new nationwide transmission lines. Additional transmission facilities will have significant impacts to the physical environment and result in aesthetic and potentially cultural impacts. The fabrication, transportation, and construction of new transmission equipment and capacity will also generate GHG emissions.

Because renewable generation is intermittent, California will also be required to increase power storage capacity to unprecedented levels if natural gas is banned. Additionally, California would need to dramatically increase hydropower capacity by increasing the size of state reservoirs by as much as 100 times above current levels. Battery storage on this scale would have significant hazardous materials, human health,

⁴ See, e.g., Pub. Res. Code § 451 (“Every public utility shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities, including telephone facilities, as defined in Section 54.1 of the Civil Code, as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.”).

⁵ Cf. *California Clean Energy Comm. v. City of Woodland* (2014) 225 Cal.App.4th 173, 208 (EIR for shopping center lacked required energy analysis despite stating, among other things, that existing facilities were sufficient to serve the project: “In addition, a substation, multiple utility lines (60 kV, 115 kV, and 230 kV), and gas transmission lines exist in the area to serve the buildout of the proposed project.”).

⁶ Clean Air Task Force, Comments On SB 100 Joint Agency Report - Charting a Path to a 100% Clean Energy Future, September 19, 2019, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=229800&DocumentContentId=61244> (CATF 2019).

fire, fire suppression, and policing services, GHG emissions, and physical impacts. The construction of new hydropower storage would similarly have significant air quality, aquatic plant, animal and habitat, land, GHG emissions, water and hydrology, public safety, and other impacts.

CEQA caselaw holds that EIRs must consider the effects of changes to the environment that can result from an expansion of facilities, services, or utilities to serve the project.⁷ Here, DEIR Chapter 4.17 does not cross-reference MM GHG-1 and fails to discuss how implementation of MM GHG-1 may lead to expanded facilities, services or utilities that would be necessary in the future when a Reach Code is adopted.

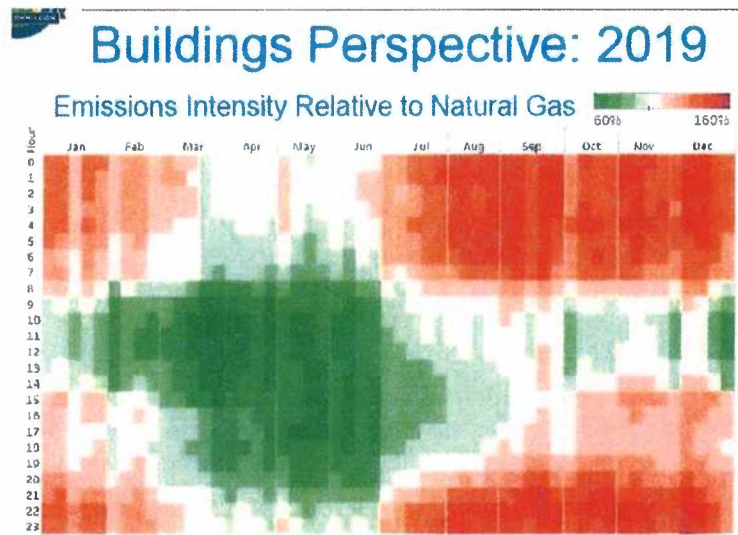
- **Greenhouse Gas (GHG) Impacts** – Implementation of a Reach Code under MM GHG-1 is predicated on the assumption that 100% electrified buildings are more energy-efficient and have a smaller carbon footprint than buildings with gas-powered appliances. Yet, multiple, independent studies demonstrate that such an assumption is not accurate.
 - In May 2019, the U.S. Department of Commerce, National Institute of Standards and Technology (“NIST”) published a study of the energy use, environmental impacts, and economic performance of residential buildings using either electricity or natural gas for space and domestic water heating. The analysis was based on a single-family home meeting all applicable building code requirements in Maryland. The NIST research concluded that a natural gas-heated home is more economical, results in “lower environmental impacts across numerous impact categories,” including lower GHG emissions, has a faster heating response time and generates a greater level of indoor comfort than an all-electric residence. In particular, GHG emissions were found to be higher because of the greater amount of fuels required to produce electricity for home use compared with the use of natural gas equipment in a residence.⁸
 - Although California has a larger proportion of renewable utility-scale energy than Maryland, consistent with the NIST study the CEC has also shown that, on average, natural gas generates substantially lower GHG emissions than electrical building use in California. As shown below, in 2018 the CEC estimated that electricity use in buildings produces a greater level of GHG emissions than natural gas about 60 percent of the year in California.⁹ Natural gas results in lower GHG emissions during a significant majority of all morning and evening hours in all months, the periods of highest residential energy demand. The significantly lower GHG emissions from natural gas use in California buildings

⁷ *Goleta Union Sch. Dist. v. Regents of Univ. of Cal.* (1995) 37 Cal.App.4th 1025; *El Dorado Union High Sch. Dist. v. City of Placerville* (1983) 144 Cal.App.3d 123.

⁸ E. O’Rear, D. Webb, J. Kneifel and C. O’Fallon. *Gas vs electric: Heating system fuel source implications on low-energy single-family dwelling sustainability performance*. Journal of Building Engineering, September 2019 issue. Full text available at https://tsapps.nist.gov/publication/get_pdf.cfm?pub_id=926046.

⁹ CEC, Building Decarbonization, 2018 Update – Integrated Energy Policy Report, Presentation by M. Brook at June 14 2018 IEPR Workshop at 16, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=223817>.

reflects the fact that, except during daytime hours from about March to June, intermittent solar and wind is insufficient to meet in-state building energy demand. When intermittent renewable energy is not available, electrical generation is less efficient and produces a greater level of GHG emissions than natural gas use in California buildings.



- Other researchers have also questioned whether requiring all electric buildings might, however unintentionally, result in higher GHG emissions. Household energy demand tends to peak in the morning and evening hours, when residents are preparing to leave for or returning from work, school or other activities and when intermittent renewable power, particularly solar, is unavailable. At these times, electric supplies must be produced from other sources, including natural gas-fired power plants. Converting fuels, such as natural gas, to electricity to meet home demands is less efficient than directly using natural gas. As a result, a Stanford University researcher has estimated that when renewable power is unavailable, such as during the evening hours, residential electricity consumption produces *three times* more GHG emissions than natural gas.¹⁰
- The County cannot assume that, over time, GHG emissions from electrical generation will be reduced during peak morning and evening periods when natural gas is currently a lower emission energy source in the state. Recent studies indicate that even if additional intermittent wind and solar generation capacity is deployed, gas-fired electrical facilities will almost certainly remain essential to stabilize the state’s power grid. The gas-fired generators serving the state, however, may be forced to increasingly operate as short-term inefficient

¹⁰ See Anthony R. Kavscek, *Is a natural gas ban an ‘antidote to climate change’?*, San Jose Mercury News (Nov. 12, 2019), https://mercurynews-ca.newsmemory.com/?publink=754c8d2e3_13411ac. Professor Kavscek is a member of the Energy Resources Engineering faculty at Stanford University.

“peaker plants” which are known to emit more GHG emissions.¹¹ Thus, it is far from clear that an all-electric building mandate will reduce GHG emissions.

The DEIR must disclose and acknowledge potential GHG impacts that could occur from shifting building energy use from natural gas to electric power given reasonably foreseeable conditions in which electrical energy consumption would produce more GHG emissions than natural gas building use.

- **Energy Impacts** – Under the CEQA Appendix G Checklist, a project may involve a significant environmental impact if it would result in “wasteful” or “inefficient” energy consumption. MM GHG-1 seeks to prohibit the installation of new natural gas infrastructure in new residential construction. But nowhere does the DEIR discuss how that may result in either (i) a failure to use already captured natural gas, or (ii) the expenditure of additional energy to transport or divert natural gas elsewhere. Studies have shown that low carbon natural gas may continue to be a viable resource in assisting the state with reaching its climate goals, and should continue to be utilized in typically hard to electrify thermal applications in residential, commercial and industrial uses.¹² Specifically, Renewable Natural Gas (“RNG”), or biomethane, can be produced from biomass wastes (e.g. forest, agriculture, waste water and food and green waste) and then processed to inject into existing pipelines. Because its production removes more potent greenhouse gas from the air (methane) compared to what is produced when used (carbon dioxide), RNG production can be carbon negative from a lifecycle perspective. The County cannot determine whether full electrification policies will have unintended consequences of “wasteful” or “inefficient” energy use, without first analyzing these impacts in the DEIR.
- **Public Health and Safety** – In an era of increasingly dry and warm climates, and increased population in the wildfire urban interface along with build out of electrical infrastructure that could be an ignition source to serve population growth, California wildfires are occurring at increased frequencies and severities. Each of the three California investor-owned utilities adhere to wildfire mitigation plans (“WMP”) submitted to and approved by the California Public Utilities Commission (“CPUC”) — which establish internal mechanisms and protocols for de-energization events, also known as Public Service Power Shutoffs (“PSPS”). PG&E’s most recent PSPS event (occurring on October 6, 2019) impacted over 728,980 customers in 35 counties across the Sacramento Valley, Sierra Foothills, North Bay, South Bay, East Bay, Central Coast,

¹¹ See, e.g., Mark Thurber, *Gas-fired generation in a high-renewables world*, Stanford University School of Earth, Energy & Environmental Sciences and Precourt Institute for Energy Natural Gas Initiative, NGI Research Brief (June 2018), https://ngi.stanford.edu/sites/g/files/sbiybj14406/f/NGI_Brief_2018-06_R3_Thurber.pdf.

¹² Energy + Environmental Economics, *Decarbonizing Pipeline Gas to Help Meet California’s 2050 Greenhouse Gas Reduction Goal* (Jan. 2005), https://www.ethree.com/wp-content/uploads/2017/02/E3_Decarbonizing_Pipeline_01-27-2015.pdf.

and parts of Southern California.¹³ Southern California Edison (“SCE”)— the investor-owned utility whose service territory includes the County — is likewise obligated to implement PSPS protocols in certain circumstances giving risk to wildfires and has done so on numerous occasions in 2019 and 2020. For example, on November 15-17, 2019, SCE instituted a PSPS event that was initially estimated to impact 31,975 customers on 48 circuits across four counties (including the County), although had a much smaller impact than originally considered.

It is evident that increasing the amount of power needed from the electrical grid, such as by reducing the use of natural gas and increasing the use of electricity, will only exacerbate these problems. Until that time, however, PSPS events will be the “new norm,” both in Northern and Southern California. In addition to the large-scale economic losses that customers suffer as a result of a PSPS event, public safety issues can also arise due to several factors. These include loss of power at critical medical facilities, added strain on first responder services (such as local police departments and EMTs), loss of school days, and disruption of critical city infrastructure during emergency responses (such as traffic lights). Although MM GHG-1 will contribute to an overloaded grid and exacerbate the economic and safety implications from future, likely PSPS events; the DEIR mentions none of these issues.

The County should consider how increased deployment of other technologies, such as microgrids and energy storage projects, can help achieve decarbonization and resiliency goals. A 2018 CEC report found that microgrid projects offer a number of “value propositions,” including renewable energy integration, grid resiliency, and carbon reductions.¹⁴ The CEC report concluded that microgrid projects align with the state’s Renewables Portfolio Standard and GHG reduction mandates.¹⁵ The County should analyze the effectiveness of these mitigation options instead of a ban on natural gas.

- ***Impacts on Biological Resources, Water Quality and Noise Stemming From Additional Renewable Generating Resources*** – As stated above, the County has not demonstrated how adopting and implementing MM GHG-1 will impact existing electricity demand. In other words, no evidence exists to support the notion that existing or future electricity load could meet energy demands if natural gas infrastructure is banned for all future residential construction. Rather, it is reasonably foreseeable that new renewable energy resources will be needed, in addition to those required under the California Renewables Portfolio Standard (“RPS”), to meet new building electrification policies. The CEC’s 2019 *California Energy Efficiency Action Plan Staff Report* acknowledges that statewide

¹³ PG&E, “Public Safety Power Shutoff (PSPS) Report to the CPUC Oct. 9-12, 2019 De-Energization Event” (Oct. 25, 2019), at https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/PSPS-Report-Letter-10.09.19.pdf.

¹⁴ Asmus, Peter, Adam Forni, and Laura Vogel. Navigant Consulting, Inc. 2017. *Microgrid Analysis and Case Study Report*. California Energy Commission. Publication Number: CEC-500-2018-022, <https://ww2.energy.ca.gov/2018publications/CEC-500-2018-022/CEC-500-2018-022.pdf>

¹⁵ *Id.* at ii.

building electrification efforts “will seek to increase the share of renewable generation on the electricity grid...”¹⁶

The DEIR does not analyze how development of foreseeable additional renewable generating resources will impact the environment. Because it is likely that the County can determine with particularity the amount of MW or MWh that will be needed to fully implement MM GHG-1 in years to come, an accompanying analysis of generating resources and their potential environmental impacts must be provided. These renewable resource facilities are known to have their own environmental impacts associated with construction and operation, including but not limited to, impacts on federal and California sensitive species, water quality and quantity, nearby noise receptors, and project-related air quality impacts.

Because such commercial-scale facilities might be located outside the County does not insulate the County from its obligation to consider the indirect environmental impacts from MM GHG-1. Indeed, “the purpose of CEQA would be undermined if the appropriate governmental agencies went forward without an awareness of the effects a project will have on areas outside of the boundaries of the project area.”¹⁷ It is well-settled that “the project area does not define the relevant environment for purposes of CEQA when a project's environmental effects will be felt outside the project area.”¹⁸

- **Environmental Justice** – “Environmental justice” is defined as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” Gov. Code § 65040.12(e). An Attorney General report defines “fairness” in this context to mean that “the benefits of a healthy environment should be available to everyone, and the burdens of pollution should not be focused on sensitive populations or on communities that already are experiencing its adverse effects.” “In addition, though CEQA’s main purpose is to evaluate whether a project may have a significant effect on the physical environment, “human beings are an integral part of the environment.”

The CEQA Guidelines state that “[e]conomic or social effects of a project may be used to determine the significance of physical changes caused by the project. For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant.” Here, MM GHG-1 would require the construction of new electric infrastructure, including within the County, to supply the electricity necessary to support a natural gas ban. This

¹⁶ California Energy Commission, *2019 Energy Efficiency Action Plan Draft Staff Report*, <https://efiling.energy.ca.gov/getdocument.aspx?tn=229496>.

¹⁷ *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 369.

¹⁸ *County Sanitation Dist. No. 2 of Los Angeles County v. County of Kern* (2005) 127 Cal.App.4th 1544, 1582–1583.

physical change to the environment will lead to cost increases for ratepayers, an economic impact which must be considered under CEQA.

Before the County can adopt MM GHG-1, the DEIR must consider the impact it will have on customer affordability and ratepayers. About 90 percent of residential energy consumers in Southern California use natural gas for space and water heating, and ratepayers prefer a choice in how they heat their homes and cook their food. Further, according to a 2018 study produced by Navigant Consulting on behalf of the California Building Industry Association, switching to all-electric appliances could cost single-family homeowners in Southern California “over \$7,200 and increase energy costs by up to \$388 per year.” Low-income customers would be the most burdened by the costs of building electrification.

Thus, as a result of adopting MM GHG-1, the County will have effectively established an unnecessary energy policy that will disproportionately impact its disadvantaged communities. Under CEQA, the County cannot gloss over this potential impact.

Given the substantial evidence that adopting and implementing MM GHG-1 will result in potential significant environmental impacts, the County is required to undertake proper CEQA review of such impacts, including both the direct and indirect environmental impacts stemming therefrom.

2. MM GHG-1 is Not “Feasible” under CEQA

Pursuant to CEQA Guidelines section 15126.4(a)(1), an EIR must “describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy.” “Feasible” means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.”¹⁹ Courts do not defer to an agency’s determination that mitigation measures will work when their efficacy is not apparent and there is no evidence in the record showing they will be effective.²⁰ Here, there is no evidence that MM GHG-1 is feasible as a means to mitigate GHG-related impacts associated with the 2040 General Plan. In fact, evidence demonstrates that natural gas bans are environmentally, economically and technologically infeasible.

Intermittent Renewable Generation Inhibits Feasibility of a Natural Gas Ban

Since 2015, several studies have evaluated the results of multiple assessments of national and California decarbonization strategies and options.²¹ Other studies have considered the power

¹⁹ CEQA Guidelines § 15364.

²⁰ See, e.g., *Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, 1168; *Communities for a Better Env’t v. City of Richmond* (2010) 184 Cal.App.4th 70, 95; *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1116-17.

²¹ See, e.g., P. Loftus et al., A critical review of global decarbonization scenarios: what do they tell us about feasibility?, WIREs Climate Change, January/February 2015, https://www.researchgate.net/publication/267875650_A_critical_review_of_global_decarbonization_scenarios_w

system and costs associated with relying solely on intermittent renewable power for decarbonization, in contrast with approaches that also utilize fossil fuels with CCS or renewable natural gas (“RNG”).²² These studies consistently conclude that renewable generation without a reliable baseload power source cannot achieve deep carbonization, will require installing massive amounts of additional generation and distribution facilities, and will be unaffordable.

- Relying on variable renewable sources such as wind, hydroelectric and solar to decarbonize will require the fabrication, installation and operation of approximately 3 to 10 times the level of solar and wind facilities that would be required if a reliable lower-carbon energy source was also utilized.²³ This overbuilding is required as intermittent power cannot achieve its nominal nameplate capacity—100 megawatts of solar or wind power will produce approximately 20-40 percent of capacity per year compared with approximately 90 percent capacity rates for natural gas. Thus, a much larger power system must be built to produce enough energy.
- As the percentage of intermittent renewable power serving a community increases, the amount of energy that is “curtailed” or wasted because it is not produced when needed can approach 40 percent of total generation.²⁴ Due to the timing mismatch between demand and the availability of solar and wind power, wind and solar would be unable to meet about 30 percent of California’s annual energy demand.²⁵ As a result, massive electrical power storage must be constructed, installed and operated

[hat do they tell us about feasibility A critical review of global decarbonization scenarios](#) (analysis of 17 decarbonization studies); J. Jenkins et al., Deep decarbonization of the electric power sector: insights from recent literature, Energy Innovation Reform Project, March 2017, <https://www.innovationreform.org/wp-content/uploads/2018/02/EIRP-Deep-Decarb-Lit-Review-Jenkins-Thernstrom-March-2017.pdf> (analysis of 30 decarbonization studies); S. Brick, Renewables and decarbonization: studies of California, Wisconsin and Germany, The Electricity Journal, 2016, https://www.researchgate.net/publication/299380869_Renewables_and_decarbonization_Studies_of_California_Wisconsin_and_Germany/fulltext/57dc15a408ae4e6f18469f9d/299380869_Renewables_and_decarbonization_Studies_of_California_Wisconsin_and_Germany.pdf?origin=publication_detail (analysis of California, Wisconsin and German studies); and J. Jenkins et al, Getting to zero-carbon emissions in the electric power sector, Joule, 2018, <https://www.sciencedirect.com/science/article/pii/S2542435118305622> (analysis of 40 studies).

²² See, e.g., N. Sepulveda et al, The role of firm low-carbon electricity resources in deep decarbonization of power generation, Joule, November 2018, <https://www.sciencedirect.com/science/article/pii/S2542435118303866?via%3Dihub> and B. Frew et al., Flexibility mechanisms and pathways to a highly renewable US electricity future, Energy, 2016, <https://web.stanford.edu/group/efmh/jacobson/Articles/Other/16-Frew-Energy.pdf>.

²³ See, e.g., P. Loftus et al., A critical review of global decarbonization scenarios: what do they tell us about feasibility?, WIREs Climate Change, January/February 2015, https://www.researchgate.net/publication/267875650_A_critical_review_of_global_decarbonization_scenarios_what_do_they_tell_us_about_feasibility? [hat do they tell us about feasibility A critical review of global decarbonization scenarios](#) and J. Jenkins et al., Deep decarbonization of the electric power sector insights from recent literature, Energy Innovation Reform Project, March 2017, <https://www.innovationreform.org/wp-content/uploads/2018/02/EIRP-Deep-Decarb-Lit-Review-Jenkins-Thernstrom-March-2017.pdf>.

²⁴ J. Jenkins et al, Getting to zero-carbon emissions in the electric power sector, Joule, 2018, <https://www.sciencedirect.com/science/article/pii/S2542435118305622> based on

²⁵ CATF 2019.

to capture a community's surplus intermittent power generation. In California alone, storing surplus generation would require batteries with an instantaneous capacity "larger than the generating capacity of the entire US electric grid." Even assuming battery storage costs fall dramatically to \$80 per megawatt, California communities would be required to pay about \$2.9 trillion to secure the necessary power storage.²⁶

- To increase the reliability of intermittent renewable energy, significant new large-scale transmission will be required to "knit together diverse wind, sun and hydro resources" including as much as "a twenty-fold increase in US transmission capacity and interties for very high renewable energy scenarios, according to the National Renewable Energy Laboratory."²⁷
- Due to the need for overbuilding, energy storage increases, and new transmission capacity, decarbonization using intermittent renewables without reliable low-carbon power sources would be unattainably expensive. The cost of electricity generation in California has been estimated to rise from about \$58 per megawatt hour with 60 percent renewable generation to \$389 using 80 percent renewable power, and an astonishing \$1,402 per megawatt hour at 100 percent renewable levels even assuming that the cost of wind, solar and storage falls substantially.²⁸ Other studies have estimated that California communities would pay more than \$1,600 per megawatt hour using 100 percent renewable power.²⁹

A Natural Gas Ban is Economically Infeasible for Customers

According to 2019 survey data published by the U.S. Energy Information Agency, the average household in California currently consumes about 7 megawatt hours of energy at a cost of approximately \$1,000 (\$0.14 per kilowatt hour). Published estimates indicate that California electrical generation costs could rise by 8 to 24 times current levels with 60 percent renewable power, higher utilization of renewables than at present. California households would also use more electrical power over time for transportation and other needs under a 100 percent renewable power scenario. Assuming that the average household electrical demand increases to 10 megawatt hours per year,³⁰ and that prices do not significantly increase until renewable use reaches 80 to 100 percent of total generation, the average California household electric bill

²⁶ CATF 2019.

²⁷ CATF 2019.

²⁸ CATF 2019.

²⁹ J. Temple, The \$2.5 trillion reason we can't rely on batteries to clean up the grid, MIT Technology Review, July 27, 2018, <https://www.technologyreview.com/s/611683/the-25-trillion-reason-we-cant-rely-on-batteries-to-clean-up-the-grid/>.

³⁰ EIA, *How much electricity does an American home use?* (Oct. 2, 2019), <https://www.eia.gov/tools/faqs/faq.php?id=97&t=3> (explaining that in 2018, the average annual electricity consumption for a U.S. residential utility customer was 10,972 kWh).

would increase to about \$8,000 per year at 80 percent renewable use, and to about \$24,000 per year with 100 percent renewable use.

Annual cost increases of this magnitude could be expected to stimulate significant population relocation to lower cost communities. Physical relocation, including the use of larger, high emission vehicles, could have significant impacts on air quality, population and housing. High household energy costs would also have significant health and safety impacts, including higher mortality and illness rates for vulnerable populations due to the inability to heat or cool homes. Direct relocation GHG emissions, and additional emissions that could occur from the movement of large amounts of households to lower cost communities with higher average household emission rates could also generate significant cumulative climate change impacts.

Higher electrical power costs could also result in the relocation, or failure to open and operate businesses in the state and the relocation of these activities to lower cost, higher-emission communities. As discussed in a January 2020 report by the California Legislative Analyst's Office, California communities already have disproportionately higher energy costs than most of the U.S. compared with marginal generation expenses. Consequently, higher costs associated with 100 percent renewable energy could generate significant GHG impacts.

3. The DEIR Finds that GHG Impact 4.8-1 Will Remain Significant and Unavoidable, but Does So Without Considering Other Feasible and Effective GHG Mitigation

Under CEQA, a lead agency may not adopt a project unless it has eliminated or substantially lessened all significant effects on the environment, or determined that remaining significant effects are acceptable due to overriding considerations.³¹ Here, the County concluded that, with the implementation of all identified GHG mitigation measures, Impact 4.8-1 would remain significant and unavoidable.³² However, the County cannot adopt this finding without implementation all feasible mitigation measures.³³ While it is true that "an EIR need not analyze 'every imaginable alternative or mitigation measure' ...," it "must respond to specific suggestions for mitigating a significant environmental impact unless the suggested mitigation is facially infeasible."³⁴

SoCalGas urges the County to consider other GHG emission-reduction strategies that are scalable and easier to implement, more resilient and more affordable. Specifically, the use of renewable gases such as hydrogen and renewable natural gas (RNG), are low carbon to negative fuels that can dramatically reduce county greenhouse gas emissions and provide optionality and flexibility for the energy system.

³¹ Pub. Res. Code. § 15092(b).

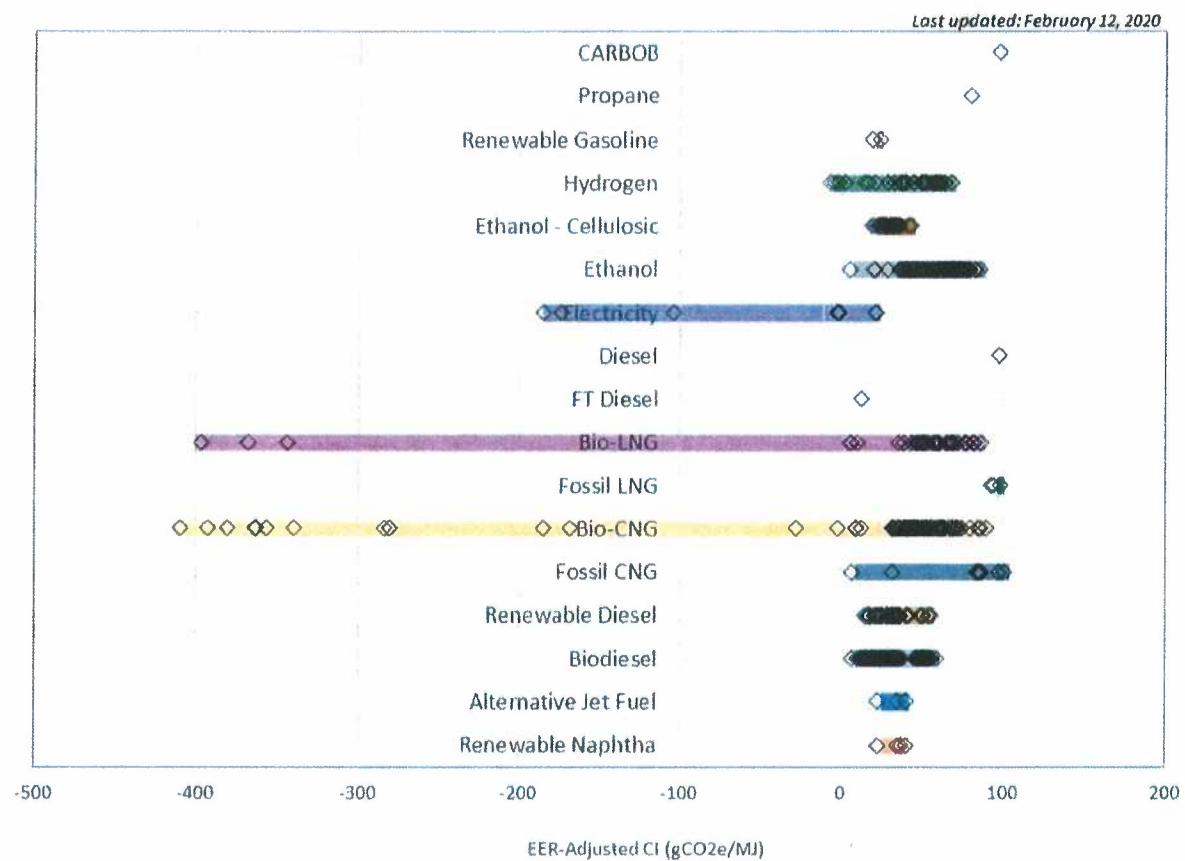
³² DEIR at 4.8-49.

³³ Guidelines §§ 15043(a), 15092(b).

³⁴ *Los Angeles Unified Sch. Dist. v. City of Los Angeles* (1997) 58 Cal. App. 4th 1019, 1029; citing *San Francisco Ecology Center v. City and County of San Francisco* (1975) 48 Cal.App.3d 584, 596 (EIR did not respond to School District's suggestion that air conditioning and filtering might prove feasible means of reducing air quality impacts under proposed plan).

As stated in our prior comment letter for the General Plan Update (attached), RNG, or biomethane, can be produced from a variety of waste resources (e.g. agricultural waste, forest biomass, waste water, and landfills) and then processed to meet pipeline specifications. Further, green hydrogen can be produced from excess solar and wind power generated when demand is low. The hydrogen can then be stored for later use in hydrogen fueling stations, be used for electric generation in fuel cells, and/or blended into the gas pipeline system to decarbonize gas supply which benefits all sectors. This technology, called Power-to-Gas, has been demonstrated in numerous pilot projects, including UC Irvine.³⁵

Carbon Intensity Values of Current Certified Pathways (2020)



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Renewable Gases Can Achieve Numerous Co-Benefits

Because most production of renewable natural gas removes methane from the air and converts it to carbon dioxide when used, RNG production can be significantly carbon negative from a

³⁵ UCI Samueli School of Engineering. UCI and SoCalGas Partner to Design "Advanced Energy Community." December 2017. Available at: <https://engineering.uci.edu/news/2017/12/uci-and-socalgas-partner-design-advanced-energy-community>

³⁶ California Air Resources Board. LCFS Certified Pathway Carbon Intensities. February 2020. Available at: <https://ww2.arb.ca.gov/resources/documents/lcfs-pathway-certified-carbon-intensities>

lifecycle perspective. Renewable gases can also achieve numerous co-benefits by helping the energy system be more flexible and work across sectors. For example, conversion of dead trees or other forest waste to renewable gases can dramatically reduce wildfire risks. The Power to Gas concept that can convert excess renewable electricity to hydrogen and store it for months instead of hours as in the case with batteries enables extension of the renewable energy for long durations to meet demand. Finally, renewable gases can reduce greenhouse gases in hard to decarbonize sectors such as agriculture and industry which form the economic engine of California. As the County is aware, SoCalGas is working towards the goal of replacing 5% of our natural gas supply with RNG by 2022, and 20% by 2030.

The CPUC is evaluating the levels of hydrogen that can be blended into the natural gas system. Just last month, Lawrence Livermore National Labs issued a study of how California can get to carbon neutrality by leveraging the gas pipelines and their rights-of-way to convey hydrogen and carbon dioxide.³⁷ In fact, the most cost-effective carbon negative solution is to convert biomass waste to hydrogen and sequester the carbon via pipelines using the rights-of-ways of the natural gas system. In addition, studies show that replacing roughly 16% of SoCalGas throughput with RNG achieves the same emissions reductions as electrifying the entire building sector by 2030.³⁸

Inclusion of RNG as a mitigation strategy also aligns with policies already included in the Draft General Plan. In particular, policies PFS-5.4, PFS-5.5, PFS-5.6, and COS-8.1 all support reuse of waste resources for energy generation as well as replacement of fossil fuels with renewable energy resources, including bioenergy. Accordingly, the use of renewable gases as a mitigation measure seems a natural complement to these policies, whereas a ban on gas infrastructure seems counterproductive. Therefore, we encourage the County to replace Mitigation Measure GHG-1: Prohibit Natural Gas in New Residential Construction, with an alternative mitigation measure that is performance-based, technology neutral and allows for flexibility in use of renewable fuels to help achieve emissions reductions.

We appreciate the opportunity to submit comments on the DEIR and look forward to working with the County as a valuable energy partner to achieve their environmental goals. If you have any questions, please do not hesitate to reach out via telephone or email.

Sincerely,



Deanna Haines
Director Policy, Strategy and Environment

³⁷ Lawrence Livermore National Laboratory. Getting to Neutral. January 2020. Available at: https://www-gs.llnl.gov/content/assets/docs/energy/Getting_to_Neutral.pdf

³⁸ Navigant Consulting, Gas Strategies for a Low-Carbon California Future (April 2018).

Simmons, Carrie

From: Downing, Clay
Sent: Thursday, February 27, 2020 4:54 PM
To: Simmons, Carrie; General Plan Update
Cc: Curtis, Susan
Subject: Fw: DRAFT EIR Comment Letter on VC 2040 General Plan
Attachments: Comment Letter on VC2040 DRAFT EIR .pdf

FYI

From: Cameron Spencer <CSpencer@portofh.org>
Sent: Thursday, February 27, 2020 4:25 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Cc: Sandra Cruz <SCruz@portofh.org>; Dona Toteva Lacayo <dlacayo@portofh.org>; Kristin Decas <KDecas@portofh.org>; Downing, Clay <clay.downing@ventura.org>
Subject: DRAFT EIR Comment Letter on VC 2040 General Plan

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

Good Afternoon Susan,

Please see the attached comment letter on the DRAFT EIR for the VC2040 General Plan.

Best Regards,

Cam Spencer
Public & Government Relations Manager

The Port of Hueneme
Oxnard Harbor District
333 Ponomo St
Port Hueneme, CA 93041
O: 805-488-3677 x2205
C: 805-816-8324
Email: CSpencer@PortofH.org
Website: www.portofhueneme.org



.....
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Kristin Decas CEO & Port Director
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OXNARD

February 27, 2020

Ms. Susan Curtis
General Plan Update Manager
County of Ventura
800 S. Victoria Ave.
Ventura, CA 93009

**RE: Comment on Draft Environmental Impact Report for the County of Ventura
Draft 2040 General Plan**

Dear Ms. Curtis,

The Port of Hueneme appreciates the opportunity to comment on the *Draft EIR* for the County's *2040 General Plan*. The inclusion and thoroughness exhibited throughout this document is appreciated. The Port applauds the detailed work of County staff, and the deliberate inclusion of economic vitality spurring sustainable development within our County.

We respectfully submit the following comment:

1. Pg. 4.13-29 Impact 4.13-7 Expose Noise-Sensitive Land Uses to Railroad Noise and Vibration that Exceeds Applicable Standards

We ask the County to revise this section to clarify that the costs associated with measuring noise levels surrounding railways for the 2040 General Plan Policies – HAZ-9.2 and HAZ-9.6 will not be placed on the owner or operator of the railroad.

We suggest the following text to clarify:

“However, 2040 General Plan Policies-HAZ-9.2 and HAZ-9.6 would ensure indoor noise levels in habitable rooms do not exceed 45 dBA CNEL and outdoor noise levels do not exceed 60 dBA L10 and would require an acoustical analysis to determine noise levels and provide appropriate reduction measures. *Costs associated with measuring these noise levels will not be the burden of the railroad owner, nor operator.* As required by 2040 General Plan Policy HAZ-9.1, the County would



prohibit discretionary development which would be impacted by noise that cannot be reduced to meet the standards prescribed in Policy HAZ-9.2.”

Sincerely,

A handwritten signature in black ink, appearing to read 'Kristin Decas', written in a cursive style.

Kristin Decas
CEO & Port Director

The Port of Hueneme
Oxnard Harbor District

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 4:26 PM
To: Simmons, Carrie
Subject: FW: Climate change has environmental impacts!

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740
Visit the Planning Division website at vcrma.org/planning
Ventura County General Plan Update. Join the conversation at VC2040.org
For online permits and property information, visit [VC Citizen Access](#)



Pursuant to the California Public Records Act, email messages retained by the County may constitute public records subject to disclosure.

From: Pamela Klieman <info@email.actionnetwork.org>
Sent: Thursday, February 27, 2020 4:23 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: Climate change has environmental impacts!

CAUTION: If this email looks suspicious, DO NOT click. Forward to Spam.Manager@ventura.org

Susan Curtis,

Dear Ventura County Board of Supervisors and Planning Department,

Climate issues are something I feel worried about. Ventura County is warming faster than any county in the nation. Our ocean is acidifying faster. Drought and floods have hit us worse, and we can expect more extreme weather.

My family and community are counting on you to assure analysis of the full scope of environmental impacts and mitigations in the Draft EIR.

First, it is necessary that all greenhouse gas emissions be counted based on the most current science.

There are many ways to mitigate climate impacts, like a sunset plan for oil and gas production, decarbonization of transportation and buildings, zero waste, incentives for regenerative agriculture and water management, and reducing emissions from tailpipes.

I want an EIR that covers major climate impacts via a systematic plan.

Thank you—

Pamela Klieman

pamela.klieman@hotmail.com

943 Olympia Ave

Ventura, California 93004

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 4:32 PM
To: Simmons, Carrie
Subject: FW: Ventura County General Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740
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Pursuant to the California Public Records Act, email messages retained by the County may constitute public records subject to disclosure.

From: Patrick de Nicola <patrickdenicola@gmail.com>
Sent: Thursday, February 27, 2020 4:30 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: Ventura County General Plan

Dear Ms. Curtis,

I am writing to express my concern over the flaws in the process, data, and conclusions of the Ventura County General Plan, Draft EIR, and supplemental documents.

My great-great grandfather, Mark McLoughlin (1843-1914), was a true Ventura County pioneer, purchasing his first 318 acres of undeveloped land in Ventura County in 1875. He was a hard-working visionary, revered by his community. With his son—my great grandfather, James Patrick McLoughlin—he raised livestock and farmed the land, providing jobs and feeding the growing towns of Oxnard and Ventura.

Our land, in a vitally important location on Olivas Park Drive across from the Ventura Marina, has been in the family, and part of the economic fabric of the community, for 100 years. And we want it to be part of the future of this community, with a flourishing economy, a thriving job market, and unsurpassed quality of life for its residents.

But the General Plan and DEIR do not describe a viable path for us as landowners going forward.

I will begin with some specific issues regarding language in the Coastal Area Plan, 4-82-83 and

4-94-95. Part of our land is located in the Central Coastal Zone, adjacent to the Ventura Marina, on Olivas Park Drive at Harbor Blvd. The only conclusion the Plan draws about our land is the statement that, “unlike the Preble area, services are not readily available to the Olivas lands.” This is false. Our property has access to all utilities, water, main roads, and the freeway. Indeed, easements on our property serve surrounding areas with utilities.

The Plan also claims that our property is “not included in the City’s sanitation district because of problems with water pressure.” This language is irrelevant and incorrect. There is no evidence that there are water pressure issues, and the sanitation district’s pipelines actually traverse our property.

While we do not know the original source of these misstatements, such misrepresentations—now repeated in the Plan—threaten to diminish the value of our land in relation to the Preble property. And, of course, they undermine the goal and the value of the Plan itself.

The General Plan also speaks of the widening of Olivas Park Drive, our southern boundary. This would have a direct impact on our property. But the Plan does not address how this would happen or how it would affect our land.

Damaging misstatements about our property also appear in the DEIR. Contrary to the portrayal in the DEIR, our property has significant infrastructure in place, as well as prime accessibility to the highway and the harbor. In fact, with easy access to the marina and beach community, and with the railroad as part of our eastern boundary, our land is uniquely suited to be an important part of future economic development in the area. We are entitled to have all these matters corrected.

I would also like to raise some additional concerns:

1. The General Plan and DEIR continue to ignore the 28% increase in the homeless population in our community.
2. According to the General Plan, if we were to build an acre of low income / worker housing we would need to buy two replacement acres of same Ag land to be placed into perpetual agricultural preservation. This is unrealistic and infeasible, and certainly not in line with the State government’s housing policies.
3. The EIR does not adequately address the enormous “indirect impacts” that will occur as a result of implementing the General Plan, calling them “less than significant.”
4. The General Plan contains policies that will increase the costs of normal farming operations, making it difficult for farming to remain profitable.
5. The Plan does not adequately evaluate the impacts of increased competition for water in our community.

The EIR is a flawed document, full of errors, that does not disclose all impacts, direct and indirect, caused by the General Plan. It was obviously rushed—completed in six weeks. It is inaccurate and incomplete, and fails to provide members of the community with the information that they are legally entitled to. This EIR should be corrected and reconsidered, and a reasonable time period should be allowed for meaningful and thoughtful community input.

Sincerely,

Patrick de Nicola

Simmons, Carrie

From: roncyndied@aol.com
Sent: Thursday, February 27, 2020 4:30 PM
To: General Plan Update; Curtis, Susan
Subject: Ventura County General Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 S. Victoria Ave., L #1740
Ventura, CA 93009-1740

GeneralPlanUpdate@ventura.org

Dear Ms. Curtis:

I am writing to call your attention to significant flaws in the process, data, and conclusions of the Ventura County General Plan, Draft EIR, and supplemental documents.

My great grandfather, Mark McLoughlin (1843-1914), was a true Ventura County pioneer, purchasing his first 318 acres of undeveloped land in Ventura County in 1875. He was a hard-working visionary, revered by his community. With his son—my grandfather, James Patrick McLoughlin—he raised livestock and farmed the land, providing jobs and feeding the growing towns of Oxnard and Ventura.

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3. The EIR does not adequately address the enormous "indirect impacts" that will occur as a result of implementing the General Plan, calling them "less than significant."
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5. The Plan does not adequately evaluate the impacts of increased competition for water in our community.

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Sincerely,
Cynthia Thomas Dickson
32075 Camino del Cielo
Trabuco Canyon, CA 92679

Simmons, Carrie

From: Lizzy Martinez <emchambers@aol.com>
Sent: Thursday, February 27, 2020 4:20 PM
To: Curtis, Susan
Cc: General Plan Update
Subject: 2040 General Plan Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Sanger Hedrick, Chair

Agricultural Policy Advisory Committee (APAC) County of Ventura
[800 S. Victoria Blvd.](#)
[Ventura, CA 93003](#)

Re: 2040 General Plan Environmental Impact Report (EIR)

Dear Mr. Hedrick and Honorable Members of APAC:

Thank you for the opportunity to provide comments following today's presentation by Ventura County Planning staff on the 2040 General Plan EIR.

There are several issues with the 2040 General Plan EIR that CoLAB believes will negatively impact the viability of local agriculture.

Proposed mitigation measure AG-2: The County proposes that any project that either directly or indirectly results in the loss of farmland must obtain and place into perpetual agricultural preservation twice the total of the farmland loss. This mitigation measure is infeasible. Contrary to statements made by County Planning staff today at the APAC meeting, the California Environmental Quality Act (CEQA) requires that all mitigation proposed in an EIR be feasible. CEQA Section 21061.1 defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time,

" (*emphasis added*). All mitigation measures proposed in an EIR must be shown to reduce impacts

and an infeasible mitigation measure, by definition, cannot and will not reduce impacts.

The EIR does not provide evidence of any of the following:

1. 1) Whether there is sufficient land available for purchase/conservation easement for each farmland category;
2. 2) The cost per acre to purchase each category of farmland;
3. 3) The anticipated cost of establishing a conservation easement for each category of farmland;

4. 4) The anticipated cost associated with managing each category of farmland under a conservation easement;
5. 5) The anticipated cost associated with monitoring these mitigation parcels scattered throughout the County and who will bear that cost;
6. 6) Any information that could constitute a “plan” for management of farmland in conservation easements;

February 19, 2020

Ventura County Coalition of Labor, Agriculture and Business / [1672 Donlon Street, Ventura, CA 93003](https://www.colabvc.org) / [805-633-2260](tel:805-633-2260) / info@colabvc.org

Page 2 of 4

7. 7) An analysis of direct and indirect impacts caused by this mitigation measure (including impacts associated with LU compatibility conflicts and increased urban-ag-interface);
8. 8) Whether the smallest possible mitigation acreage required will achieve the minimum to ensure viability of agriculture on the parcel; and
9. 9) Whether the proposed mitigation is in conflict with other ordinances and regulations, such as the County’s Zoning Ordinance and the County’s minimum lot sizes.

The County is already aware that this proposed mitigation measure is infeasible. On March 24, 2016, at a Local Agency Formation Commission (LAFCo) hearing, Supervisor Linda Parks attempted to establish an “Agricultural Mitigation Measure” through the LAFCo project approval process. The mitigation measure would have required the 1-to-1 purchase of local farmland (half of what is proposed in the 2040 General Plan EIR) to replace farmland that would be impacted by any proposed development. Ventura County Counsel, Michael Walker, informed both LAFCo and Supervisor Parks that the proposed mitigation measure did not meet the standard for economic feasibility, and, for that and other reasons, LAFCo could not adopt Supervisor Park’s proposed mitigation measure. He referenced a 2015 legal decision, *City of Irvine v. County of Orange*, in which the Court stated, “the sheer astronomical expense of land supports the finding of the EIR that the purchase of an agricultural conservation easement is a non-starter.”

In addition to being infeasible, CoLAB does not believe that this mitigation measure will reduce impacts on agricultural land, as it does not address the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

Indirect Impacts

The EIR dismisses “indirect impacts” that will occur as a result of implementing the 2040 General Plan as “less than significant.”

Page 4.2-13 of the EIR states “AG-2.3 maintains the Right-to-Farm Ordinance to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of

living in or near agricultural areas...These sections of the code protect farmers engaged in agricultural activity from public nuisance claims...This protects the farming community, including Important Farmlands and farms less than 10 acres, from developments that would inhibit their ability to continue agricultural production.”

Page 4.2-17 of the EIR states: “Residential growth in areas nearby agricultural lands has the potential to result in land use conflicts. Residential land uses are generally more sensitive and prone to conflict with adjacent agricultural land uses than commercial or industrial land uses. The placement of sensitive land uses, such as residences and schools, nearby classified farmland can negatively impact both uses due to conflict including odor nuisances and noise from agriculture machinery. The countywide Right-to-Farm Ordinance protects existing agricultural and farming operations from conflicts attributed to residential development...**Therefore, the potential for conflicts would be minimal. This impact would be less than significant**” (*emphasis added*).

This is simply not true. Historic and recent County actions have shown that the County has and will continue to create new restrictions and ordinances that have a significant impact on existing agricultural

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Page **3** of **4**

and farming operations because of conflicts attributed to residential development. The recent interim urgency ordinance restricting hemp cultivation is one such example.

Contrary to statements made today by Ventura County Planning staff, an EIR, whether it is labeled as “programmatic” or “project”, must analyze all reasonably foreseeable consequences of the action that is proposed. For the 2040 General Plan EIR, the action proposed is the implementation of all policies and programs within. Therefore, if the implementation of a policy in the 2040 General Plan will result in an impact, that impact must be analyzed. For example, the 2040 General Plan contains land use designation changes that will increase allowable housing density near agricultural land. It is reasonably foreseeable that more houses will create more compatibility conflicts with normal farming operations. The impact of these compatibility conflicts must be addressed in the EIR.

In 2014, the California Court of Appeal stated in a ruling that “[T]he fact that this EIR is labeled a ‘project’ rather than a ‘program’ EIR matters little....Designating an EIR as a program EIR ... does not by itself decrease the level of analysis otherwise required in the EIR. All EIRs must cover the same general content. The level of specificity of an EIR is determined by the nature of the project and the “rule of reason,” rather than any semantic label accorded to the EIR.”

It is CoLAB’s opinion that indirect impacts from increasing urban-ag interface are SIGNIFICANT and cannot be dismissed in the EIR.

Direct and indirect impacts of increased costs

The 2040 General Plan has policies that will increase the costs of normal farming operations. CoLAB believes that the most effective way to minimize conversion of agricultural land to non-agricultural uses is to take active measures to allow farming to remain profitable. And even the County admits that reducing the cost of farming reduces conversion of agricultural land in their discussion of the Williamson Act in Chapter 4.2 of the EIR.

But the County fails to analyze direct and indirect impacts of 2040 General Plan policies that will increase the cost of normal farming operations, such as:

- Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment. The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment when feasible.
- Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps. The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilities to eliminate or reduce standby charges.

Direct and indirect impacts of increased competition for water resources

The County fails to evaluate the impact of increased competition for water resources caused by development allowed in the 2040 General Plan on either the conversion of agricultural land or the loss of agricultural lands through the loss of topsoil.

The EIR states on page 4.2-3 that "...a reduction in available water resources for irrigation" is an example of indirect impacts on agricultural land due to loss of topsoil from increased wind and water erosion.

But the County fails to analyze or propose mitigation measures to address this significant impact.

[Ventura County Coalition of Labor, Agriculture and Business](http://www.colabvc.org) / [1672 Donlon Street, Ventura, CA 93003](http://1672DonlonStreet.com) / [805-633-2260](tel:805-633-2260) / info@colabvc.org

Page 4 of 4

APAC is the expert charged with advising County decision-makers on agricultural issues in Ventura County. And the County should be seeking guidance from APAC about the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

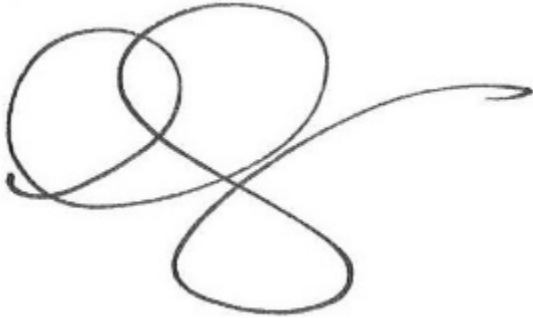
CoLAB encourages APAC to provide guidance to the County on appropriate and effective mitigation measures to prevent the conversion of agricultural land to non-agricultural uses. These may include:

1. 1) Strengthen the Right-to-Farm ordinance to prevent nuisance complaints from being used to justify the creation or expansion of setbacks or regulatory restrictions on normal farming practices;
2. 2) Expand the Land Conservation Act Program to include Open Space zoned properties that are engaged in farming (including grazing); and
3. 3) Protect agricultural land from urban-ag interface encroachment and compatibility conflicts by establishing setbacks on NON-AE-zoned land that will restrict the construction of bike paths, public trails, and sensitive receptors within 2000' of any land zoned A/E.

Thank you again for the opportunity to provide comments on this issue. We appreciate your consideration and leadership at this time.

Sincerely,

Louise Lampara Executive Director

A handwritten signature in black ink, consisting of several overlapping loops and a long, thin tail extending to the right.

In support of this letter-
Elizabeth Chambers Martinez

Sent from my iPhone