

## 4.8 GREENHOUSE GAS EMISSIONS

This section evaluates the potential effects of implementing the 2040 General Plan for greenhouse gas (GHG) emissions, including whether the project would conflict with applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions, or generate GHG emissions, either directly or indirectly, that would have a significant effect on the environment. As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

The County received 67 public comments in written or oral form pertaining to GHG emissions during the notice of preparation (NOP) comment period for this EIR, which occurred from January 14 through February 19, 2019. These comments provided insight on the conditions within the community, recommendations on approaches for analyzing emissions, and suggestions for new or revised policies and programs aimed at reducing GHG emissions. All comments were considered during preparation of the 2040 General Plan and some resulted in changes or additions to the version of the 2040 General Plan presented to the public, the Planning Commission, and the Board of Supervisors at hearings in August and September 2019. Themes of these public comments included support for densification of land use, carbon sequestration, land conservation, sustainable energy, GHG target setting, and encouraging alternative modes of transportation to reduce vehicle miles travelled (VMT). These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

### 4.8.1 Background Report Setting Updates

#### REGULATORY SETTING

In addition to the information provided in Chapter 12, “Climate Change,” of the Background Report (Appendix B), the following information is relevant to understanding the potential GHG impacts of the 2040 General Plan:

- ▶ Executive Order (EO) B-55-18, which calls for California to achieve carbon neutrality by 2045 and achieve and maintain net negative GHG emissions thereafter. These targets are in line with the scientifically established levels needed in the United States to limit the rise in global temperature to no more than 2 degrees Celsius (°C), the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected; these targets also pursue efforts to limit the temperature increase even further to 1.5 °C (United Nations 2015:3).
- ▶ The California Air Resources Board (CARB) has adopted GHG Regulations for Crude Oil and Natural Gas, which requires mandatory reporting for methane emissions associated with oil and gas production on State and private lands and requires retrofitting of associated equipment to reduce methane leakage (CARB n.d.). Enforcement of these regulations at

the local level is supported by the Ventura County Air Pollution Control District (VCAPCD), which has published Compliance Assistance Advisory for reporting (VCAPCD 2018a) and an Implementation and Enforcement Guide to provide guidance to VCAPCD staff, the public, and the regulated community when implementing, complying with, and enforcing CARB's GHG Regulations for Crude Oil and Natural Gas (VCAPCD 2018b). This guidance, issued November 2018, is applicable to existing wells as well as new wells that require permits from the VCAPCD Air Pollution Control Officer for construction and operation (VCAPCD 2019a,b).

- ▶ To protect public health and agriculture from the adverse effects of air pollution by identifying air pollution problems and developing a comprehensive program to achieve and maintain state and federal air quality standards, the Ventura County APCD Implementation and Enforcement Policy Guide provide guidance to both VCAPCD staff, the public, and the regulated community. The VCAPCD staff enforces the Greenhouse Gas Emission standards through both their own regulations and inspections and works with CARB's GHG staff and Enforcement Division staff. The policy guide provides a framework and guidance for enforcement procedures regarding the GHG regulation and VCAPCD's existing oilfield regulations in VCAPCD's Rules 71.1 and 74.10. The fugitive methane emissions are controlled through leak detection (VOC's measured as methane) and repair for ongoing leak surveys at subject facilities. These surveys are also conducted and recorded by the subject facility on a quarterly basis. Leak detection and repair requirements are also implemented during the VCAPCD facility inspections through various methods, including annual compliance, complaint investigation and follow-up, and break-down reports and follow-up. Compliance requirements include repair of subject equipment to leak-free status and confirmation of leak-free status via re-inspection by VCAPCD enforcement staff.
- ▶ California's 2017 Climate Change Scoping Plan (2017 Scoping Plan), prepared by the CARB, outlines the main strategies California will implement to achieve the target for statewide GHG reduction to 40 percent below 1990 levels by 2030, in accordance with Senate Bill (SB) 32. The 2017 Scoping Plan is also intended to "substantially advance toward our 2050 climate goals" in accordance with goals set in Executive Order (EO) S-3-05. The plan identifies the reductions needed by each GHG emission sector (e.g., transportation, industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste). To support the plan's goals of increasing carbon sequestration, in addition to GHG reduction, CARB and other State agencies are currently developing a Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal of Executive Order B-55-18.
- ▶ Updates to California's Title 24 Building Energy Efficiency Standards (Part 6) and Green Building Standards Code (Part 11) have been adopted by the California Energy Commission (CEC) and are scheduled to go into effect on January 1, 2020. The Building Energy Efficiency Standards are enforced at the local level through building departments and set the minimum code requirements for new commercial and residential building construction and major alterations. The adoption of this code is estimated to reduce GHG emissions by 700,000 metric tons of carbon dioxide equivalent (CO<sub>2</sub>e) over the three years that the code will be in place until the next scheduled update. Additional information on the requirements of the Title 24 standards can be found in Section 4.6, "Energy," of this draft EIR.
- ▶ On August 2, 2018, the National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (EPA) proposed the Safer Affordable Fuel-Efficient

Vehicles Rule (SAFE Rule). This rule addresses emissions and fuel economy standards for motor vehicles and is separated in two parts as described below.

- Part One “One National Program” (84 FR 51310) revokes a waiver granted by EPA to the State of California under Section 209 of the Clean Air Act to enforce more stringent emission standards for motor vehicles than those required by EPA for the explicit purpose of GHG reduction, and indirectly, criteria air pollutant and ozone precursor emission reduction. This revocation became effective on November 26, 2019, restricting the ability of CARB to enforce more stringent GHG emission standards for new vehicles and set zero emission vehicle mandates in California. CARB has estimated the vehicle tailpipe and evaporative emissions impacts to criteria air pollutants from SAFE Rule Part One and has provided off-model adjustment factors to adjust emissions output from CARB’s Emission Factor (EMFAC) model.
- Part Two would address Corporate Average Fuel Economy (CAFE) standards for passenger cars and light trucks for model years 2021 to 2026. This rulemaking proposes new CAFE standards for model years 2022 through 2026 and would amend existing CAFE standards for model year 2021. The proposal would retain the model year 2020 standards (specifically, the footprint target curves for passenger cars and light trucks) through model year 2026, but comment is sought on a range of alternatives discussed throughout the proposed rule. This proposal addressing CAFE standards is being jointly developed with EPA, which is simultaneously proposing tailpipe carbon dioxide standards for the same vehicles covered by the same model years. As of January 10, 2020, Part Two is not final. The timing of a final SAFE Rule Part Two and the outcome of any pending or potential lawsuits (and how such lawsuits could delay or affect its implementation) are unknown at this time.

## ENVIRONMENTAL SETTING

In addition to the information provided in Chapter 12, “Climate Change,” of the Background Report (Appendix B), the following information is relevant to understanding the potential GHG impacts of the 2040 General Plan:

- ▶ The Climate Action Plan (CAP) referenced in Section 12.1, “Greenhouse Gas Emissions,” of the Background Report has been integrated into the elements of the 2040 General Plan.

## 4.8.2 Environmental Impacts and Mitigation Measures

### METHODOLOGY

According to the County’s Initial Study Assessment Guidelines (ISAG), the primary concern for CEQA analyses pertaining to GHG emissions should be the cumulative impact of a project’s incremental GHG emissions when viewed in connection to past, current, and probable future project GHG emissions. The ISAG explain that under the State CEQA Guidelines, each lead agency may develop its own approach to performing a climate change analysis for projects that generate GHG emissions (Ventura County 2011:125). The ISAG also explain that CEQA compliance entails three basic steps:

- ▶ identify and quantify the GHG emissions;
- ▶ assess the significance of the impact on climate change; and,
- ▶ if the impact is found to be significant, identify alternatives and/or mitigation measures that will reduce the impact below significance.

Additionally, Section 6.10 of the 2040 General Plan explains that the CAP is integrated within the plan and will serve as a qualified “plan for the reduction of greenhouse gases” that could allow for the cumulative impacts analyses of GHG emissions for future projects in the County to tier from the GHG analysis contained in this draft EIR in accordance with CEQA Guidelines Section 15183.5. This section states that to be used for CEQA streamlining for future projects the plan must follow the steps listed below. Items underlined are requirements that overlap with the CEQA compliance steps in the ISAG.

- ▶ Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.
- ▶ Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable.
- ▶ Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area.
- ▶ Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.
- ▶ Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendments if the plan does not achieve specified levels.
- ▶ Be adopted in a public process following environmental review.

The actions described in the following sections were used during development of the integrated CAP to conform with the ISAG guidance and are therefore relevant to the methodology used for analyzing the environmental impacts of the 2040 General Plan’s GHG emissions. Supporting technical documentation for GHG inventory, forecasting and reduction measures are included in Appendix D of this draft EIR.

#### GHG Emissions Inventory

The GHG emissions inventory for the unincorporated county was updated from a base year of 2012 to 2015 during preparation of the 2040 General Plan to account for the availability of more current activity data and methods. This inventory update included GHG emissions from multiple sectors including agriculture, building energy, off-road equipment, solid waste, stationary sources, transportation, and water/wastewater. Consistent with guidance from the Governor’s Office of Planning and Research (OPR), the 2015 community-wide GHG inventory was prepared using the U.S. Community Protocol for Accounting and Reporting of GHG Emissions, Version 1.1 (International Council for Local Environmental Initiatives (ICLEI) 2013). In response to comments on the NOP, the inventory was updated to use global warming potential (GWP) values for methane and nitrous oxide from the Intergovernmental Panel on

Climate Change's (IPCC) Fifth Assessment Report (AR5). This is a change in GWP values from the IPCC Fourth Assessment Report (AR4), which were originally used in the inventory, and in Appendix B of the 2040 General Plan for consistency with the State's Scoping Plan. GWP values apply a weight to gases that have been determined by scientific studies to have increased GHG effects relative to the most common GHG, carbon dioxide (CO). These weighted gasses are combined with CO to form a common unit of measurement called CO<sub>2e</sub>. For this analysis GWP values of 28 for methane and 265 for nitrous oxide were used for consistency with AR5 (Myhre et. al 2013). Table 4.8-1 shows the 2015 GHG emissions for Ventura County, which were used as the baseline for the integrated CAP.

**Table 4.8-1 Baseline 2015 GHG Emissions for the Unincorporated County**

Sector	MT CO <sub>2e</sub>	% of countywide emissions <sup>1</sup>
Agriculture	260,849	13.7
Building Energy	322,048	17.0
Off Road Equipment	52	<0.1
Solid Waste	333,167	17.6
Stationary Source	275,096	14.5
Transportation	692,753	36.5
Water and Wastewater	13,148	<0.1
<b>Total</b>	<b>1,897,112</b>	

1: Percentages may not add to 100 percent due to rounding.

### Projections

GHG emissions in the unincorporated area of the county were forecast through 2020, 2030, 2040, and 2050 using growth rates for population, employment, and housing prepared by the Southern California Association of Governments (SCAG) for the 2020 Regional Transportation Plan and Sustainability Communities Strategy (SCAG 2017). Transportation sector GHG emissions for on-road vehicles were projected using VMT forecasts obtained from the Ventura County Transportation Commission (VCTC). These VMT forecasts were adjusted using recommended methods from the SB 375 (2008) Regional Targets Advisory Committee and converted to CO<sub>2e</sub> using emissions factors from CARB's Emissions Factor model. The business-as-usual forecasts were adjusted to account for State and federal legislative and regulatory actions that will reduce future emissions from activities within the unincorporated area, without any additional local government action. Legislation and regulations considered include:

- ▶ SB 100 (2018) Renewable Portfolio Standard (RPS) Program and Zero-Carbon Electricity Standards,
- ▶ CARB Oil and Natural Gas Regulations,
- ▶ AB 341 (2011) Solid Waste Diversion,
- ▶ SB 1383 (2016) Organic Waste Regulations,
- ▶ AB 1493 (2002) Clean Car Standards, and
- ▶ CARB Advanced Clean Car Standards (2012) regulatory update to AB 1493 (2002) Standards.

Legislative actions include existing or reasonably foreseeable regulations, programs, or a combination thereof that are required by State or federal legislation and will result in widespread mandatory reductions across various emissions sectors. Table 4.8-1 shows baseline emissions for 2015 and Table 4.8-2 provides forecast emissions in 10-year intervals from 2020 to 2050. Although 2050 is beyond the 2040 General Plan horizon, GHG emissions are projected through 2050 for the analysis to be consistent with State law, as described in the following section. The projections described in this document are contained in Appendix B, Section B.1.2, of the 2040 General Plan. These figures differ from the numbers contained in the preliminary public draft of the 2040 General Plan because the figures in this EIR analysis use AR5 GWP values rather than AR4. AR4 was previously used for consistency with the State's 2017 Scoping Plan but was changed in response to comments received during the public scoping period for the 2040 General Plan.

**Table 4.8-2 Forecast GHG Emissions for Unincorporated Ventura County 2020 to 2050**

Sector	Forecast Emissions <sup>1</sup> (MT CO <sub>2e</sub> )			
	2020	2030	2040	2050
Agriculture	256,223	248,882	241,541	234,200
Building Energy	308,629	285,079	225,567	197,996
Off Road Equipment	52	52	52	52
Solid Waste	302,811	278,381	270,289	262,560
Stationary Source	287,845	314,526	343,679	375,535
Transportation	625,263	487,058	446,355	450,232
Water and Wastewater	13,148	13,148	13,148	13,148
Total	1,793,971	1,627,124	1,540,630	1,533,723

Notes: MT CO<sub>2e</sub> = metric tons of carbon dioxide equivalents, comprised of carbon dioxide, methane, and nitrous oxides. <sup>1</sup>Includes legislative reductions from State and federal programs.

Source: Ascent Environmental, 2019

## Targets

The CAP contained in the 2040 General Plan sets GHG reduction targets at 10-year intervals that are aligned with the State's legislative GHG reduction targets and other reduction goals. As directed in Assembly Bill (AB) 32 (2006), SB 32 (2016), and EOs B-30-15 and S-3-05, the State aims to reduce annual statewide GHG emissions to 1990 levels by 2020, 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050. CARB's 2017 Scoping Plan recommends that local agencies establish community-wide GHG reduction goals for local climate action of GHG reduction plans that will help the State achieve its 2030 target and longer-term 2050 goal. Based on this guidance equivalent targets were calculated for the 2040 General Plan relative to the State's 2015 statewide baseline and targets. Specifically, the State's 2015 GHG emissions inventory was compared to the State's 2020, 2030, and 2050 mass emissions targets relative to its 1990 inventory, from which specific percent reductions relative to 2015 were developed. Therefore, consistent with the State's targets relative to 2015 levels, the 2040 General Plan's targets are expressed according to the percentage reductions in GHG emissions relative to the unincorporated county's 2015 community-wide GHG emissions levels as shown in Table 4.8-3.

**Table 4.8-3 2040 General Plan Target Reduction from 2015 Baseline Emissions Levels, 2020 to 2050**

	2020	2030	2040	2050
Target Percentage Below 2015 Baseline GHG Emission Levels	2.1%	41.3%	60.9%	80.4%
GHG Emissions Target (MT CO <sub>2</sub> e)	1,856,620	1,113,972	742,648	371,324
GHG Reductions Needed from Forecast GHG Emissions to Meet Targets (MT CO <sub>2</sub> e)	-62,649	513,153	797,982	1,162,398

Notes: the negative number for GHG reductions in 2020 means that the forecast GHG emissions for 2020 will be below the 2020 target.

Source: Ascent Environmental, 2019

### Reduction Measures

The 2040 General Plan intends to reduce GHG emissions and improve local resilience to the anticipated impacts of climate change through approximately 150 policies and 77 programs focused on climate action. These policies and programs are included throughout each of the 2040 General Plan's elements and are denoted by a "CAP" icon. As provided below, 118 of the policies and 45 of the programs were designed to reduce GHG emissions. The plans and programs for GHG reduction address future development anticipated under the 2040 General Plan, as well as existing activities within the county contributing to GHG emissions as identified in the 2015 community GHG emissions inventory. The policies included in the 2040 General Plan serve as guidance for decision making, while the programs operationalize these policies into implementable actions. For this reason, the impact analysis in this draft EIR evaluated the GHG reducing effects of policies proposed for implementation by programs included in the 2040 General Plan.

The "2040 General Plan Policies and Implementation Programs" section below also provides a description of the reduction measures along with a reference to the sections of the 2040 General Plan where they can be found. The GHG reduction measures contained in the 2040 General Plan are designed to provide the GHG reductions necessary to address the gap between legislatively adjusted business-as-usual emissions and reduction targets as shown in the third row of Table 4.8-3, above. The analyses contained in the impact section of this draft EIR evaluate whether the GHG reduction benefits of these policies and programs are supported by substantial evidence as required in 15183.5 of the State CEQA Guidelines. Substantial evidence leading to estimates of GHG emissions resulting from implementation of the 2040 General Plan includes both qualitative and quantitative assessments, consistent with Section 15064.4(a) of the State CEQA Guidelines.

## THRESHOLDS OF SIGNIFICANCE

As discussed in the "Approach to the Environmental Analysis" section, the thresholds used to determine the significance of the 2040 General Plan's impacts are based on Ventura County's adopted ISAG, which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides initial study checklist questions to consider when determining the significance of a project's impacts.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, GHG emissions are discussed in Section 24 of the ISAG, with subsection B referencing State CEQA Guidelines provisions related to the analysis of GHG emissions, including Section 15064.4 regarding the determination of significance of GHG emissions. The ISAG reference the State CEQA Guidelines as a source for establishing GHG thresholds through the following statement:

“Threshold of significance criteria for determining whether a project’s GHG emissions is significant, either project specifically or cumulatively, is set forth in CEQA Guidelines Sections 15064(h)(3), 15064.4, 15130(b)(1)(B) and (d), and 15183.5, all of which may be used individually, collectively or in combination with one another in making such a determination” (Ventura County 2011).

The ISAG does not establish a specific threshold for GHG emissions but describes preliminary research conducted by VCAPCD regarding GHG-related CEQA thresholds and proposed CEQA guidance from OPR’s “CEQA and Climate Change” Technical Advisory from 2008.

#### Ventura County Air Pollution Control District

Following publication of the ISAG in 2011, VCAPCD published a memorandum entitled *Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County* (VCAPCD 2011). This document explored programmatic thresholds based on variations of a no threshold approach, a zero-threshold approach, or a non-zero approach. While VCAPCD has not adopted the GHG thresholds explored as part of this non-binding informational document, the two options described below were included in the memorandum. Because ISAG describes the VCAPCD research into CEQA thresholds for GHG emissions, the contents of the VCAPCD memorandum are described below and were considered in the formulation of thresholds of significance for this draft EIR.

#### Threshold Option 2.2 Quantitative Threshold Based on Market Capture

This option employs a “bright line” threshold to capture of 90 percent or more of likely future discretionary developments. The objective is low enough to capture a substantial fraction of future residential and non-residential land use development expected to be constructed to accommodate future statewide population and job growth, while the emission threshold is high enough to exclude most small land use development projects that contribute a minor fraction of cumulative statewide GHG emissions. Another advantage of this option is that it is simple and easy to understand and implement.

#### Threshold Option 2.7: Efficiency-Based Thresholds

This option is based on efficiency metrics, such as GHG emissions per capita or employment, or some combination thereof, set to ensure consistency with AB 32 GHG emission reduction goals. GHG efficiency thresholds can be determined by dividing the estimated 2020 AB 32 GHG emissions inventory goal (allowable GHG emissions), by the estimated 2020 population and employment, referred to as the Service Population (SP). The service population for a residential project would be the number of new residents. The service population for a commercial project would be number of employees. The service population for a mixed-use project would be the number of residents plus employees. This calculation gives approximate efficiency threshold values of 4.6 MT CO<sub>2</sub>e per SP for individual projects (housing developments, shopping centers, etc.), and 6.6 MT CO<sub>2</sub>e per SP for general plans, etc. The benefit of an efficiency-based threshold is that it tends to encourage mixed-use, infill development over more traditional “sprawl-type” development (i.e., large suburban residential housing tracts or commercial shopping centers) that has been the norm in California for many decades.

In concluding remarks, VCAPCD states that establishing GHG thresholds for CEQA analyses poses a challenge because “CEQA was designed for and works best for projects with local to regional scale environmental effects, such as those on local roadways, waterways, wildlife habitats, and in areas that are relatively small and well defined. CEQA does not work as well or at all on a global scale. This is because micro-scale effects, such as additional vehicular traffic from a new shopping center, cannot be seen on large scales” (VCAPCD 2011). The district further concluded that it would continue to explore options for GHG thresholds in Ventura County “with preference for GHG threshold consistency with the South Coast AQMD (SCAQMD) and the SCAG region” (VCAPCD 2011)

The GHG thresholds in the current SCAQMD Air Quality Significance Threshold guidance focus exclusively on industrial facilities. In this guidance, GHG emissions from industrial facilities are considered significant if they exceed 10,000 MT CO<sub>2e</sub> per year (SCAQMD 2019).

#### 2019 CEQA Guidelines Amendments

Since the publication of the ISAG in 2011, the GHG-related provisions of the State CEQA Guidelines, which are referred to as proposed guidance in the ISAG, have been adopted. The most recent version of the State CEQA Guidelines became effective on December 28, 2018. Appendix G of the State CEQA Guidelines provides considerations for determining the significance of a project’s GHG impacts, in the form of initial study checklist questions.

#### Appendix G, Section VIII - Greenhouse Gas Emissions

Appendix G, Section VIII of the State CEQA Guidelines states that the potential significance of GHG emissions may be determined by lead agencies by evaluating whether the project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or, conflict with an applicable plan, policy, or regulation for the purpose of reducing the emissions of GHGs.

#### Section 15064(h)(3)

This section is intended to determine whether an EIR is required for a project based upon whether the project’s potential cumulative impacts are addressed by existing plans. Because an EIR is being prepared for the 2040 General Plan this section would not apply.

#### Section 15064.4

This section “Determining the Significance of Impacts from Greenhouse Gas Emissions” provides the following guidance to lead agencies:

A lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project. This effort can rely on quantification, qualitative analyses or performance-based standards at the discretion of the lead agency.

In determining the significance of a project’s GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project’s emissions to the effects of climate change. A project’s incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency’s analysis should consider a timeframe that is appropriate for the project. The agency’s analysis also must reasonably reflect evolving scientific knowledge and State regulatory schemes.

A lead agency should consider the following factors, among others, when determining the significance of impacts from GHG emissions on the environment: the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions; in determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable; a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use.

#### Section 15130(b)(1)(B)

This section states that the discussion of cumulative impacts should reflect the severity of the impacts and their likelihood of occurrence, including a summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

#### Section 15130(d)

This section states that previously approved land use documents, including, but not limited to, general plans, specific plans, regional transportation plans, plans for the reduction of GHG emissions, and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impacts analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the proposed project have already been adequately addressed, as defined in section 15152(f), in a certified EIR for that plan.

#### Section 15183.5

This section states that to be used for CEQA streamlining for future projects the plan must meet several conditions. The plan must quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area; establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable; Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area; specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level; establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and be adopted in a public process following environmental review.

### Thresholds of Significance for this Draft EIR

The thresholds used to analyze potential environmental impacts in this draft EIR are based on the criteria set forth in Appendix G, Section VIII with the additional sections of the State CEQA Guidelines described in the previous headings used as indicators to determine consistency with the overarching objectives sought by the criteria.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant GHG emissions impact if it would:

- ▶ Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
- ▶ Conflict with an applicable plan, policy, or regulation for the purpose of reducing the emissions of GHGs.

## 2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs of the 2040 General Plan related to GHG emissions and, specifically, the thresholds of significance identified above, are included below.

### Land Use and Community Character Element

- ▶ **Policy LU-1.1: Guidelines for Orderly Development.** The County shall continue to promote orderly and compact development by:
  - working with cities in Ventura County and the Ventura Local Agency Formation Commission (LAFCO) to promote and maintain reasonable city boundaries and Spheres of Influence to prevent growth-inducing urban development in unincorporated areas, and
  - require unincorporated urban development to be located in areas designated as Existing Communities and unincorporated urban centers consistent with the Guidelines for Orderly Development and as defined in Policy LU-1.2.
- ▶ **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., hours of operation, and scheduling of deliveries) to minimize adverse impacts (e.g., noise, glare, and odors) on adjoining and adjacent residential areas.
- ▶ **Policy LU-11.4: Sustainable Technologies.** The County shall encourage discretionary development on commercial- and industrial- designated land to incorporate sustainable technologies, including energy- and water-efficient practices and low- or zero-carbon practices.

- ▶ **Policy LU-16.5: Multimodal Access to Commercial Development.** The County shall encourage discretionary commercial development to promote ease of pedestrian/bicycle access to encourage walk-in business, while providing sufficient off-street parking.
- ▶ **Policy LU-16.9: Building Orientation and Landscaping.** The County shall encourage discretionary development to be oriented and landscaped to enhance natural lighting, solar access, and passive heating or cooling opportunities to maximize energy efficiency.
- ▶ **Policy LU-18.5: Participation in Climate Change Planning.** The County shall encourage stakeholders in designated disadvantaged communities who are vulnerable to sea level rise or other climate change impacts to have the opportunity to learn about and participate in the decision-making process for adaptation planning within Ventura County.
- ▶ **Policy LU-22.2: Implementation Program Monitoring.** The County shall maintain and annually review the General Plan Implementation Programs before the preparation of the County's Annual Budget. As part of this process, the County shall update the prioritization of programs based on applicability, relevance, timing of initiation, and availability of funding.

#### Implementation Programs

- ▶ **Implementation Program A: Guidelines for Orderly Development Implementation.** The County shall continue to implement the Guidelines for Orderly Development and work with cities to promote orderly and compact, increased options for affordable housing, lower vehicle miles traveled, and limit sprawl.
- ▶ **Implementation Program P: Annual General Plan Implementation Review.** The County shall review the General Plan annually, focusing on the status and progress of program implementation. The County shall prepare a report to the Board of Supervisors summarizing the status of implementation programs and any recommendations for General Plan amendments

#### Circulation, Transportation and Mobility Element

- ▶ **Policy CTM-2.1: Complete Streets.** The County shall prepare and adopt Complete Streets Design Guidelines to be used when constructing new roadways or improving existing roadways where Complete Streets would be appropriate/feasible. The Complete Streets Design Guidelines shall employ a context-sensitive approach to planning and designing the road and street network to reflect the distinct agricultural, rural, or urban character of a particular location.
- ▶ **Policy CTM-2.2: Functional Classification.** The County shall plan a roadway system that has adequate capacity and is designed to provide reasonable and safe use by vehicles, public transportation, bicycles and pedestrians with minimum delay pursuant to LOS standards described in Policy CMT-1.2. The road system should follow Federal Highway Administration (FHWA) classification.
- ▶ **Policy CTM-2.3: County Road Access.** The County shall require discretionary development with access onto a County road to have the access point(s) designed and built to County standards.
- ▶ **Policy CTM-2.4: Transportation System Safety.** The County shall strive to provide safe operating conditions for all appropriate modes and uses of County roadways.

- ▶ **Policy CTM-2.5: Emergency Services.** The County shall coordinate the development and maintenance of all transportation facilities with emergency service providers to ensure continued emergency service operation and service levels.
- ▶ **Policy CTM-2.6: Regional Transportation Planning.** The County shall work with Caltrans, Southern California Association of Governments (SCAG), Ventura County Transportation Commission (VCTC), and cities in the county to plan, develop, and maintain regional transportation facilities and services, and to identify existing and future transportation corridors that should be linked across jurisdictional boundaries so that sufficient right-of-way may be preserved.
- ▶ **Policy CTM-2.7: Congestion Management Program.** The County shall coordinate with Ventura County Transportation Commission (VCTC) to implement and update the Congestion Management Program (CMP). The County shall also encourage consideration of multimodal performance measures as part of future updates to the CMP.
- ▶ **Policy CTM-2.8: Congestion Management Program and County Regional Network Consistency.** For those portions of the County's Regional Road Network currently not designated as part of the Congestion Management Program (CMP), the County shall coordinate with Ventura County Transportation Commission (VCTC) to formally designate applicable County maintained roadways as part of the CMP.
- ▶ **Policy CTM-2.9: State Route 118 Improvement in Saticoy Area.** The County shall work with the Ventura County Transportation Commission (VCTC) and Caltrans to reprioritize the re-stripping of SR 118 from Vineyard Avenue to Darling Road on the Ventura County Congestion Management Plan and the Caltrans list of projects to provide for an additional lane in each direction of travel.
- ▶ **Policy CTM-2.10: Safe Routes to School.** The County shall work with public and private schools to identify and expand safe routes to school, where feasible.
- ▶ **Policy CTM-2.11: Efficient Land Use Patterns.** The County shall establish land use patterns that promote shorter travel distances between residences, employment centers, and retail and service-oriented uses to support the use of public transportation, walking, bicycling, and other forms of transportation that reduce reliance on single-passenger automobile trips.
- ▶ **Policy CTM-2.12: Countywide Bicycle Lane and Trail System.** The County shall coordinate with the cities in the county and Ventura County Transportation Commission (VCTC) to plan and implement a system of bicycle lanes and multi-use trails that link the cities, unincorporated communities, schools including colleges and universities, commercial/retail, employment centers, health care service facilities, public transportation, and other points of interest.
- ▶ **Policy CTM-2.13: Transportation System Connectivity.** The County shall strive to eliminate "gaps" in roadways, bikeways, and pedestrian networks by planning for and seeking funding to construct necessary improvements to remove barriers and improve transportation system connectivity as well as connections that support first and last mile accessibility to and from public transportation.

- ▶ **Policy CTM-2.14: Bicycle Facility Design.** When designing new bicycle facilities, or modifying existing roadways with bicycle facilities, the County shall prioritize and install features to improve the safety and visibility of bicyclists.
- ▶ **Policy CTM-2.15: Bicycle/Pedestrian Design.** The County shall rely on the guidelines and design standards for bicycle and pedestrian facilities established by the California Manual on Uniform Traffic Control Devices (CAMUTCD) and supporting guidelines provided the Federal Highway Administration, Caltrans, and the American Association of State Highway and Transportation Officials (AASHTO).
- ▶ **Policy CTM-2.16: Pedestrian Planning.** The County shall consider the safety and accessibility of pedestrians when preparing transportation plans, studies, and reports
- ▶ **Policy CTM-2.17: Support Regional Bicycle Infrastructure.** The County shall support regional bicycle efforts to improve infrastructure that will make biking more attractive to residents and tourists.
- ▶ **Policy CTM-2.18: Complete Streets Standards in Existing Communities.** The County shall require discretionary development in designated Existing Communities to construct roadways to urban standards and Complete Streets principles, including curb, gutter, sidewalks, and bike lanes when there is a nexus for improvement. The County shall rely on the guidelines and design standards for Complete Streets design established by the California Manual on Uniform Traffic Control Devices (CAMUTCD), Caltrans in the Highway Design Manual, and Complete Streets Guidelines (pursuant to Deputy Directive-64-R2), Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO).
- ▶ **Policy CTM-2.19: Safety Metrics.** The County shall continue to examine and update safety metrics for California Environmental Quality Act (CEQA) impact analysis as appropriate. Options include but are not limited to: queue spill-back at intersections; mid-block unprotected crossings; and, increased crossing distances.
- ▶ **Policy CTM-2.20: Safe Pedestrian Crossings.** The County shall improve pedestrian safety at intersections and mid-block locations in Existing Communities through approved features consistent with the California Manual on Uniform Traffic Control Devices (CAMUTCD), Highway Design Manual, Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO), and the National Cooperative Highway Research Program Report 498 (Application of Pedestrian Crossing Treatments for Streets and Highways).
- ▶ **Policy CTM-2.21: Pedestrian/Bicycle Conflicts along Overweight Vehicle Corridor and Surface Transportation Assistance Act (STAA) Truck Routes.** Within Existing Communities, the County shall provide/retrofit separated or buffered pedestrian and bicycle paths from the outside travel lane along County Road Network roads that are designated Overweight Vehicle Corridors and STAA designated Terminal Access Routes. Where the application or retrofitting of separated or buffered facilities is not feasible, the County shall prioritize alternative pedestrian and bicycle connections that encourage and attract pedestrian and bicycle traffic off designated Overweight Vehicle Corridors or STAA designated truck routes.

- ▶ **Policy CTM-2.22: Funding and Maintenance for Sidewalks.** The County shall seek funding sources first for construction of new sidewalks in designated disadvantaged communities and then for sidewalk maintenance, particularly in low-income areas.
- ▶ **Policy CTM-2.23: Intercommunity and Countywide Public Transportation System.** The County shall continue to work with Ventura County Transportation Commission (VCTC), Naval Base Ventura County, and local public transportation regional bus service providers to promote the expansion of a safe, efficient, convenient, integrated, and cost-effective intercommunity and countywide public transportation and bus service that provides county residents with access to employment, commercial services, health and medical facilities, social services, educational facilities and institutions, and personal business destinations.
- ▶ **Policy CTM-2.24: Non-Drivers Living in Rural Areas.** The County shall work with Ventura County Transportation Commission (VCTC) and local public transportation providers to address the needs of non-drivers living in rural areas to provide public transportation and paratransit service.
- ▶ **Policy CTM-2.25: Amtrak Service Improvements.** The County shall support the recommendations of the California State Rail Plan for Amtrak trains, including track and signalization upgrades, increasing service frequencies by adding additional round-trip service to regional destinations north and south of Ventura County, improving passenger information and comfort, and reducing travel time.
- ▶ **Policy CTM-2.26: Abandoned Railroad Rights-of-Way.** When railroad rights-of-way are abandoned, the County shall evaluate the feasibility of acquiring the land for public use as public transportation, bicycle, pedestrian, or equestrian paths.
- ▶ **Policy CTM-2.27: Discretionary Development and Conditions of Approval to Minimize Traffic Impacts.** The County shall require that discretionary development be subject to the following permit conditions of approval, where feasible, to minimize traffic impacts by incorporating pedestrian and bicycle pathways, bicycle racks and lockers, ridesharing programs, transit improvements (bus turnouts, shelters, benches), and/or transit subsidies for employees or residents of the proposed development.
- ▶ **Policy CTM-3.1: Bicycle Network Strategy and Prioritization.** The County shall identify and prioritize components of a bicycle network to increase public access and ridership on bicycle routes.
- ▶ **Policy CTM-3.2: Inclusive Bicycle Network.** The County shall develop a bicycle network for all user types and routes across the county.
- ▶ **Policy CTM-3.3: Regional Destination Focus for Bicycle Network.** The County shall encourage the development of a bicycle network that connects to regional destinations such as parks, trails, educational institutions, employment centers, transit, park and ride lots, and tourist destinations.
- ▶ **Policy CTM-3.4: Interjurisdictional Bicycle Network Connectivity.** The County shall promote bicycle network connectivity between Ventura County communities as well as Santa Barbara and Los Angeles Counties.

- ▶ **Policy CTM-3.5: Bicycle Routes in Rural Areas.** The County shall plan for bicycle network connectivity in rural, agricultural, and open space areas in a way that supports and complements business and agricultural activities in those areas.
- ▶ **Policy CTM-3.6: Coordination with Bicycle Wayfinding Plan.** The County shall support the Complete Streets effort by, when feasible, constructing bicycle lanes on County maintained roads listed in the Ventura County Transportation Commission Bicycle Wayfinding Plan.
- ▶ **Policy CTM-3.7: Bicycle Trail along Santa Paula Branch Line.** The County shall encourage the construction of a bicycle trail along the Santa Paula Branch Line Railroad in the unincorporated area between the cities of Ventura and Santa Paula.
- ▶ **Policy CTM-3.8: Bicycle Network Routes and Wayfinding.** The County shall use clear and consistent message and placement for on- and off-street regional bikeways and to regional destinations.
- ▶ **Policy CTM-3.9: Funding for Bicycle Network and Wayfinding Planning and Improvements.** The County shall actively pursue outside funding opportunities for bicycle network improvements.
- ▶ **Policy CTM-3.10: Bicycle Storage Facilities.** The County shall require adequate bicycle storage facilities (e.g., bicycle racks, lockers) for discretionary development as determined by allowable land uses at a given site.
- ▶ **Policy CTM-4.1: Reduce Vehicle Miles Traveled (VMT).** The County shall work with Caltrans and Ventura County Transportation Commission (VCTC) to reduce VMT by:
  - facilitating the efficient use of existing transportation facilities;
  - striving to provide viable modal choices that make driving alone an option rather than a necessity;
  - supporting variable work schedules to reduce peak period VMT; and
  - providing more direct routes for pedestrians and bicyclists.
- ▶ **Policy CTM-4.2: Alternative Transportation.** The County shall encourage bicycling, walking, public transportation, and other forms of alternative transportation to reduce Vehicle Miles Traveled (VMT), traffic congestion, and GHG emissions.
- ▶ **Policy CTM-4.3: Vehicle Occupancy.** The County shall work with a broad range of agencies (e.g., Caltrans, Ventura County Transportation Commission (VCTC), Amtrak, Ventura County Air Pollution Control District, public transportation providers and shared mobility vendors) to encourage and support programs that increase vehicle occupancy including the provision of traveler information, shuttles, and preferential parking for carpools/vanpools.

- ▶ **Policy CTM-4.4: Park-and-Ride Facilities.** The County shall coordinate with Caltrans and Ventura County Transportation Commission (VCTC) to identify future park-and-ride lots within the unincorporated areas of Ventura County to facilitate more carpooling, vanpooling, and public transportation use.
- ▶ **Policy CTM-6.1: Routine Use of Alternative Transportation Options.** The County shall support the integration of emerging technologies that increase the routine use of alternative transportation options to decrease single-passenger automobile travel.
- ▶ **Policy CTM-6.3: Permeable Pavement.** As part of new roadway planning and design as part of discretionary development, the County shall promote the use of permeable paving and other passive drainage features such as bio-swales to prevent flooding, particularly in urban areas.
- ▶ **Policy CTM-6.4: Facilities for Emerging Technologies.** The County shall support the development of alternative fueling stations (e.g., electric and hydrogen) and vehicle-to-infrastructure (V2I) technology for emerging technologies.
- ▶ **Policy CTM-6.5: Electric Vehicle Charging Stations.** The County shall support the installation of electric vehicle charging stations, where feasible, at County facilities, parking lots, park-and-ride lots, truck stops, and new development.
- ▶ **Policy CTM-6.6: Neighborhood Electric Vehicles.** The County shall encourage developments and street systems that support the use of properly licensed Neighborhood Electric Vehicles where appropriate.
- ▶ **Policy CTM-6.7: Shared Mobility Operations.** The County shall encourage and support car share operators at multimodal facilities including public transportation hubs, passenger rail stations, and park-and-ride lots.
- ▶ **Policy CTM-6.8: Micro-Mobility Operations.** The County shall evaluate the feasibility and work to establish requirements for shared micro-mobility (e.g., bike sharing) vendors within unincorporated areas.
- ▶ **Policy CTM-6.9: Mobility-as-a-Service Enterprises – Vehicle Operations.** The County shall encourage Mobility-as-a-Service providers to park between service calls versus driving within unincorporated communities.
- ▶ **Policy CTM-6.10: Mobility-as-a-Service Enterprises – Support Public Transportation.** The County shall encourage Mobility-as-a-Service providers to coordinate with public transportation providers that serve unincorporated areas to increase the attractiveness of public transportation through the provision of free or subsidized public transportation patron first and last mile connections within unincorporated communities.

#### Implementation Programs

- ▶ **Implementation Program A: Traffic Impact Mitigation Fee Program.** The County shall update its Traffic Impact Mitigation Fee program and perform a comprehensive update to the program every five (5) years pursuant to Government Code section 66000 et seq.

- ▶ **Implementation Program B: Initial Study Assessment Guidelines.** The County shall update and adopt its' Initial Study Assessment Guidelines to address Vehicle Miles Traveled (VMT) and safety metrics pursuant to CEQA Guidelines Section 15064.3.
- ▶ **Implementation Program C: Vehicle Miles Traveled (VMT) Reduction Program.** To support climate change related goals and CEQA related VMT policies per SB 743 (2013), the County shall develop a Vehicle Miles Traveled Reduction Program.
- ▶ **Implementation Program D: Regional Road Network Coordination.** The County shall continue to coordinate across its own agencies as well as with cities in Ventura and Los Angeles Counties and Caltrans to identify needed improvements to the Regional Road Network.

This will include identification of funds available and needed for County and cities inter-city road-building purposes to construct improvements

- ▶ **Implementation Program H: Complete Streets Guidelines.** The County shall prepare and adopt Complete Streets Design Guidelines/standards to be used when constructing new roadways or improving existing roadways where Complete Streets would be appropriate/feasible. Complete Streets Design Guidelines/standards should be consistent with the pedestrian and bicycle design guidelines and design standards established by Caltrans and supporting state/federal guidelines when designing bicycle/pedestrian facilities. These include the California Manual on Uniform Traffic Control Devices (CAMUTCD), Highway Design Manual, Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO).

The County shall improve pedestrian safety at intersections and mid-block locations in developed communities by providing pedestrian crossing treatments where appropriate

- ▶ **Implementation Program I: County Road Standards Update.** The County shall update Road Standards to include the Complete Street Design Guidelines/Standards
- ▶ **Implementation Program J: Vision Zero.** The County shall develop a Vision Zero strategy for the County of Ventura with the goal of reducing all traffic fatalities and severe injuries, while increasing safe, healthy, equitable mobility for all.
- ▶ **Implementation Program K: Safe Routes to School.** The County shall support the Safe Routes to School Program by identifying opportunities to support bike and pedestrian routes to schools, identify needed improvements and opportunities to increase public access and use of these routes
- ▶ **Implementation Program L: Master Bicycle Network Plan.** The County shall develop a master bicycle network plan that includes the recommendations from the Bicycle Wayfinding Study and the prioritized list of bike lanes from the Board approved criteria
- ▶ **Implementation Program M: Bicycle Wayfinding Plan Participation.** The County shall continue to participate in and support the Ventura County Transportation Commission in updates to the Bicycle Wayfinding Plan linking all Ventura County cities, unincorporated communities, and CSUCI.

- ▶ **Implementation Program N: Storage Facilities for Shared Mobility Enterprises.** The County shall analyze the feasibility of shared micro-mobility (e.g., bike sharing) vendors being required to provide storage/parking areas or facilities to be designated and/or physically placed outside of the public right-of-way if private shared mobility vendors are allowed to operate within the unincorporated areas of the county.
- ▶ **Implementation Program O: Mobility-as-a-Service Enterprises – Parking.** The County shall consider designating parking areas in County parking facilities for Mobility-as-a-Service (MaaS) vehicles to use between customer service runs and will work with cities to provide locations as well.

#### Public Facilities, Services and Infrastructure Element

- ▶ **Policy PFS-1.2: Resilient Facilities and Services.** The County shall monitor the projected impacts of climate change and natural disasters to make adaptive improvements and upgrades to public facilities and services.
- ▶ **Policy PFS-1.3: Location of New Essential Public Facilities.** The County shall review plans for constructing new essential public facility, such as a hospital, health care facility, emergency shelter, emergency command center, or emergency communications facility, so that these facilities are located outside of at-risk areas whenever feasible. If such a location is infeasible, then the County shall require the use of construction methods and site design features to minimize potential damage to these facilities.
- ▶ **Policy PFS-1.10: Efficient County Operation and Maintenance.** The County shall operate and maintain County facilities in an efficient manner that meets community needs while conserving financial and natural resources.
- ▶ **Policy PFS-2.1: Sustainable Plans and Operations.** The County shall encourage energy efficiency, GHG reduction features, and resiliency planning into County facility and service plans and operations.
- ▶ **Policy PFS-2.2: Sustainable Community Facility Design.** The County shall encourage the incorporation of sustainable design features in community facilities to reduce energy demand and environmental impacts, such as reflective roofing, permeable pavement, and incorporation of shade trees.
- ▶ **Policy PFS-2.3: Energy Efficient Facility Construction, Purchases, Leases, Retrofits, and Expansions.** The County shall prioritize energy efficiency and water conservation as key design features when constructing, purchasing, leasing, retrofitting or expanding County facilities.
- ▶ **Policy PFS-2.4: Recycling Receptacles and Biodegradable/Recycled-Materials Products.** The County shall provide recycling and composting receptacles and use of biodegradable or recycled-material products at County facilities and events, where feasible.
- ▶ **Policy PFS-2.5: County Employee Trip Reduction.** The County shall encourage its employees to reduce the number and distance of single-occupancy vehicle work trips.

- ▶ **Policy PFS-2.6: County Alternative Fuel Vehicle Purchases.** The County shall review market-available technologies for alternative fuel vehicles and prioritize purchase of vehicles to reduce GHG emissions where economically feasible.
- ▶ **Policy PFS-2.8: Electric Vehicle Charging Station Infrastructure.** The County shall include electrical vehicle charging station infrastructure in new County-initiated facility construction to the extent feasible. The County shall also look for opportunities to install EV charging stations as part of any major renovation, retrofit or expansion of County facilities.
- ▶ **Policy PFS-4.4: Groundwater Resource Protection.** The County shall encourage wastewater treatment facilities to provide the maximum feasible protection and enhancement of groundwater resources.
- ▶ **Policy PFS-4.6: Reclaimed Water.** The County shall encourage public wastewater system operators to upgrade existing wastewater treatment systems to reclaim water suitable for reuse for landscaping, irrigation, and groundwater recharge.
- ▶ **Policy PFS-5.4: Solid Waste Reduction.** The County shall support and promote solid waste reduction, recycling, and composting efforts, including food waste reduction in cases where consumable food can be redistributed rather than disposed.
- ▶ **Policy PFS-5.5: Agricultural Waste Reuse.** The County shall support the beneficial reuse of agricultural wastes for activities such as composting and energy generation.
- ▶ **Policy PFS-5.6: Value-Added Alternatives to Waste Disposal.** The County shall promote value-added alternatives to solid waste management, such as compost, energy, biochar, and wood products to avoid open burning of agricultural biomass wastes.
- ▶ **Policy PFS-6.3: Climate Change Impacts on Flood Control and Drainage Facilities – Capacity.** The County shall monitor projected climate change impacts, and coordinate with local, regional, state, and federal agencies to identify existing and potential projected impacts and develop strategies to maintain and improve flood control facilities accordingly.
- ▶ **Policy PFS-6.4: Climate Change Impacts on Flood Control and Drainage Facilities – Retention.** The County shall coordinate with local, regional, state, and federal agencies to identify existing and potential infrastructure improvements to increase water retention to respond to drought conditions.
- ▶ **Policy PFS-7.2: Reduce Transmission Facility Fire Hazard Risk.** The County shall work with utility companies to modernize and upgrade transmission lines and associated equipment to reduce the risk of fire in areas with a high wildfire hazard risk.
- ▶ **Policy PFS-7.6: Smart Grid Development.** The County shall work with utility providers to implement smart grid technologies as part of new developments and infrastructure projects.
- ▶ **Policy PFS-12.4: Consistent Fire Protection Standards for New Development.** The County, in coordination with local water agencies and the Fire Protection District, shall require new discretionary development to comply with applicable standards for fire flows and fire protection.

## Implementation Programs

- ▶ **Implementation Program A: Infrastructure Improvements and Funding.** The County shall prepare, adopt, and periodically update capital improvement programs for all County-owned and operated facilities and services to maintain adequate levels of service and consistency with the General Plan.
- ▶ **Implementation Program C: Climate Change Impacts Monitoring.** The County shall conduct, and periodically update, Climate Change Impacts Monitoring reports to map locations of communication, energy, public service, transportation facilities, and infrastructure that are vulnerable to rising sea levels and coastal flooding.
- ▶ **Implementation Program D: Climate Change Adaptation Response.** Based on findings from the Climate Change Impact Monitoring reports, in cases where existing County facilities are found to be vulnerable to sea-level rise or coastal flooding, the County shall identify funding and create an action plan to protect, accommodate, or manage the retreat of County facilities to areas of higher elevation or reduced flood exposure. For facilities operated by other entities, the County shall work with these entities to create an action plan to protect, accommodate, or manage the retreat of their facilities to areas of higher elevation or reduced flood exposure.
- ▶ **Implementation Program E: County Procurement Guide.** The County shall update the County's Procurement Guide to prioritize the procurement of products made from recycled materials (e.g., office products and equipment, recycled asphalt use in roads and bike paths) and for reusing or sharing equipment/resources, when feasible.
- ▶ **Implementation Program F: Trip Reduction for County Staff.** The County shall provide support for the following trip-reduction methods for County staff members:
  - carpooling/vanpooling,
  - active transportation options (e.g., pedestrian or biking),
  - use of electric or alternative energy vehicles, and
  - public transit use.

These will be accomplished through incentives, such as dedicated parking areas, electric vehicle (EV) charging stations at County facilities, carpool/vanpool coordination, and flexible work shifts.

- ▶ **Implementation Program G: Local Agency Management Program.** The County shall review and update the Local Agency Management Program plan every five years consistent with the State Water Resources Control Board Onsite Wastewater Treatment Systems Policy.
- ▶ **Implementation Program J: Public Education of Onsite Wastewater Treatment Systems Care.** The County shall promote and support programs to educate homeowners on the care and maintenance of private onsite wastewater treatment systems and environmental implications of improper maintenance.

- ▶ **Implementation Program K: Coordination on Large Onsite Wastewater Treatment Systems Repairs.** The County shall coordinate with the Los Angeles Regional Water Quality Control Board to address compliance and repair issues for large onsite wastewater treatment systems (over 5,000 gallons) and package treatment systems.
- ▶ **Implementation Program L: Food Waste Reduction.** The County shall provide educational and informational materials to restaurants, grocery stores, and other food providers, as part of food handler permitting, to support donation of safe, unused food to non-profit service agencies.

#### Conservation and Open Space Element

- ▶ **Policy COS-1.13: Partnerships for Protection of Natural and Biological Resource.** The County shall continue to work in partnership with agencies, organizations, and entities responsible for the protection, management, and enhancement of the county's biological resources.
- ▶ **Policy COS-2.2: Beach Nourishment.** The County shall support activities that trap or add sand through beach nourishment, dune restoration, and other adaptation strategies to enhance or create beaches in areas susceptible to sea-level rise and coastal flooding.
- ▶ **Policy COS-2.10: Saltwater Intrusion.** The County shall work with Federal, State, and local jurisdictions, agencies, and organizations to monitor saltwater intrusion and take proactive steps to reduce intrusion, including:
  - working to maintain and restore coastal wetlands buffers;
  - enhancing groundwater management to prevent excessive pumping in order to restore groundwater levels needed to reduce saltwater intrusion; and
  - implementing mitigation measures to prevent saltwater intrusion into estuaries and groundwater basins including, but not limited to, implementation of reactive barriers and use of pumps to divert saltwater.
- ▶ **Policy COS-3.2: Tree Canopy.** The County shall encourage the planting of trees and the protection of existing urban forests and native woodlands, savannahs, and tree canopy throughout the county, including along State or County designated scenic roadways and in residential and commercial zones throughout the county but especially those located within designated disadvantaged communities.
- ▶ **Policy COS-3.3: Utility Undergrounding Priority.** The County shall give overhead utility undergrounding within high fire hazard areas and Scenic Resource Areas first priority when allocating County Utility Undergrounding Funds.
- ▶ **Policy COS-5.3: Soil Productivity.** The County shall encourage landowners to participate in voluntary programs that reduce soil erosion and increase soil productivity. To this end, the County shall promote coordination between the Natural Resources Conservation Service, Ventura County Resource Conservation District, University of California Cooperative Extension, and other similar agencies and organizations.

- ▶ **Policy COS-7.2: Oil Well Distance Criteria.** The County shall require new discretionary oil wells to be located a minimum of 1,500 feet from residential dwellings and 2,500 from any school.
- ▶ **Policy COS-7.4: Electrically-Powered Equipment for Oil and Gas Exploration and Production.** The County shall require discretionary development for oil and gas exploration and production to use electrically-powered equipment from 100 percent renewable sources and cogeneration, where feasible, to reduce air pollution and GHG emissions from internal combustion engines and equipment.
- ▶ **Policy COS-7.7: Conveyance for Oil and Produced Water.** The County shall require new discretionary oil wells to use pipelines to convey oil and produced water; oil and produced water shall not be trucked.
- ▶ **Policy COS-8.1: Reduce Reliance on Fossil Fuels.** The County shall promote the development and use of renewable energy resources (e.g., solar, thermal, wind, tidal, bioenergy, hydroelectricity) to reduce dependency on petroleum-based energy sources.
- ▶ **Policy COS-8.2: Incentives for Energy Efficiency.** The County shall encourage the State and energy utility companies to provide programs, rebates, and incentives for energy efficiency installation and retrofit projects.
- ▶ **Policy COS-8.3: Coordinate Climate Action Plan with Cities and Organizations.** The County shall facilitate the coordination of its Climate Action Plan implementation and maintenance with the cities in the county, the Air Pollution Control District, and other organizations to promote countywide collaboration on addressing climate change.
- ▶ **Policy COS-8.4: Clean Power Alliance.** The County, as a signatory to a legal entity created under a Joint Powers Authority with neighboring communities, shall continue to serve as an active member of the Clean Power Alliance or similar organization providing local customer access to electricity generated from low carbon renewable energy sources in excess of State requirements.
- ▶ **Policy COS-8.5: Decarbonize Communitywide Electricity Supplies.** The County shall work with utility providers to offer residents options to purchase and use renewable energy resources.
- ▶ **Policy COS-8.6: Zero Net Energy and Zero Net Carbon Buildings.** The County shall support the transition to zero net energy and zero net carbon buildings, including electrification of new buildings.
- ▶ **Policy COS-8.7: Sustainable Building Practices.** The County shall promote sustainable building practices that incorporate a “whole systems” approach for design and construction that consumes less energy, water, and other non-renewable resources, such as by facilitating passive ventilation and effective use of daylight.
- ▶ **Policy COS-8.8: Renewable Energy Features in Discretionary Development.** The County shall encourage the integration of features that support the generation, transmission, efficient use, and storage of renewable energy sources in discretionary development.

- ▶ **Policy COS-8.9: Urban Tree Canopy Improvements for Energy Conservation.** The County shall encourage discretionary development to include the planting of shade trees on each property and within parking areas to reduce radiation heat production.
- ▶ **Policy COS-8.10: Battery Energy Storage Systems.** The County shall encourage battery energy storage systems as an option for optimizing the management of electricity generated by renewable resources.
- ▶ **Policy COS-8.11: Improve Energy Conservation Awareness.** The County shall encourage community members to conserve energy and reduce greenhouse gas emissions and increase awareness about energy efficiency and climate change, to conduct targeted outreach to homeowners and contractors to encourage installation of electric appliances upon routine replacement of natural gas appliances and heaters and provide information regarding financial incentives.
- ▶ **Policy COS-9.1: Open Space Preservation.** The County shall preserve natural open space resources through:
  - the concentration of development in Urban Areas and Existing Communities;
  - use of cluster or compact development techniques in discretionary development adjacent to natural open space resources;
  - maintaining large lot sizes in agricultural areas, rural and open space areas;
  - discouraging conversion of lands currently used for agricultural production or grazing;
  - limiting development in areas constrained by natural hazards; and
  - encouraging agricultural and ranching interests to maintain natural habitat in open space areas where the terrain or soil is not conducive to agricultural production or grazing.
- ▶ **Policy COS-9.3: Open Space Preservation.** The County shall place a high priority on preserving open space lands for recreation, habitat protection, wildlife movement, flood hazard management, public safety, water resource protection, and overall community benefit.
- ▶ **Policy COS-10.1: GHG Reduction Strategy.** The County shall maintain and refer to the General Plan and its integrated GHG (GHG) Reduction Strategy as the County's comprehensive plan for reducing community-wide GHG emissions in the unincorporated County.
- ▶ **Policy COS-10.2: Community Greenhouse Gas Emissions Reduction Target for 2030.** The County shall achieve a community-wide GHG emissions reduction target of 41 percent below 2015 levels by 2030.
- ▶ **Policy COS-10.3: Community Greenhouse Gas Emissions Reduction Goals for 2040 and 2050.** The County shall work towards achieving longer-term, post-2030 community-wide GHG emissions reduction goals, as follows:

- 61 percent below 2015 levels by 2040, and
  - 80 percent below 2015 levels by 2050.
- ▶ **Policy COS-10.4: Greenhouse Gas Reductions in Existing and New Development.** The County shall reduce GHG emissions in both existing and new development through a combination of measures included in the GHG Strategy, which includes new and modified regulations, financing and incentive-based programs, community outreach and education programs, partnerships with local or regional agencies, and other related actions.

#### Implementation Programs

- ▶ **Implementation Program C: Update Tree Protection Ordinance.** The County shall update existing Tree Protection Regulations in the Non-Coastal Zoning Ordinance to further enhance conservation of our urban forests and the preservation of the County's oak woodland resources. Updates shall include incorporation of Board-adopted recommendations from the Ventura County Oak Woodlands Management Plan (2007), which include tree replacement offsets for ministerial development projects that remove protected trees, revisiting mitigation ratios for tree removal and oak woodland impacts for discretionary development projects. The update shall also evaluate existing protections for invasive, non-native trees and consider the degree to which they provide habitat for a species during critical life stages (e.g., colonial roost sites, breeding sites, etc.). In addition, the evaluation shall also include anticipated effects of climate change on the urban forest environment.
- ▶ **Implementation Program H: County Tree Planting Program.** The County shall plant at least one thousand trees annually on County property.
- ▶ **Implementation Program I: Grants for Climate Change Adaptation Activities.** The County shall apply for grants through the California Coastal Commission and other organizations for beach nourishment, dune restoration, and other adaptation activities to improve the resilience of county beaches to sea-level rise and coastal flooding.
- ▶ **Implementation Program M: Oil and Gas Tax.** The County shall evaluate the feasibility of establishing a local tax on oil and gas operations located in the unincorporated county.
- ▶ **Implementation Program N: Sustainable Building, Siting, and Landscaping Practice Guidelines.** The County shall prepare sustainable building, siting, and landscaping practice guidelines that promote a whole systems approach to building designs and construction techniques that reduce consumption of non-renewable resources such as oil, gas and water and promote renewable energy use.
- ▶ **Implementation Program O: Assessment of Land Near Electrical Transmission and Distribution Lines.** The County shall conduct a study and prepare a publicly available assessment of suitable undeveloped lands near electrical transmission and distribution lines that serve as priority areas for the development of utility-scale solar energy generation and storage projects. If suitable locations are identified, the County shall establish a new zone, called a Renewable Energy Priority Zone, for these sites in the County's Coastal and Non-Coastal Zoning Ordinances.

- ▶ **Implementation Program P: Study to Demonstrate Energy and Greenhouse Gas (GHG) Savings.** The County shall conduct a study that demonstrates the energy and greenhouse gas (GHG) savings of the options identified in Implementation Program COS-L using modeled building prototypes. To satisfy state regulatory requirements for Energy Reach Code adoption, the study shall also demonstrate long-term cost savings of the options through a life-cycle cost analysis that considers the initial costs of efficiency improvements offset by utility bill cost savings and other relevant factors.
- ▶ **Implementation Program Q: Incentives for Development in the Renewable Energy Priority Zone.** To incentivize the development of the Renewable Energy Priority Zone sites, the County shall consider waiving permit fees and providing a reduction on the annual property tax assessment for the portion of land used for renewable energy generation or storage.
- ▶ **Implementation Program R: Performance-Based Building Code for Green Building.** The County shall update the Building Code to establish performance-based standards that incentivize green building techniques.
- ▶ **Implementation Program S: Building Code Update.** The County shall update the Building Code to include a mandatory Energy Reach Code.
- ▶ **Implementation Program T: Energy Consumption Performance.** The County shall continue to review its energy consumption performance and implement programs designed to increase energy efficiency in County-owned buildings, including, but not limited to:
  - reduced operating hours for heating, ventilating and lighting systems,
  - installation of weather stripping on all openable doors and windows,
  - development of energy audit and energy management programs,
  - implementation of operation and maintenance programs which contribute to energy conservation,
  - develop energy audits and energy management programs for all County-owned facilities,
  - develop a plan to re-invest utility company rebates and utility savings into a long-range funding program for on-going conservation projects,
  - implement operational and maintenance programs which contribute to energy conservation,
  - investigate and implement new energy technologies such as solar and fuel cells,
  - install energy management systems in all County-owned facilities to control air conditioning and lighting systems where beneficial,
  - install ceiling, wall, and roof insulation whenever feasible,
  - install plumbing flow restrictors in toilets, lavatories and showers, and
  - provide energy conservation training and literature to all County agencies.

- ▶ **Implementation Program U: Solar Canopies in Non-Residential Projects.** The County shall amend the County's Coastal and Non-Coastal Zoning Ordinances to require parking lots for new non-residential construction projects, with floor area of greater than 50,000 square feet, to include solar canopies.
- ▶ **Implementation Program W: Energy Efficiency and Conservation Program.** The County shall develop a behavior change program for energy efficiency and conservation. This program would provide energy literacy training for low-income customers on buying energy-efficient products or using energy more efficiently; develop and offer digital applications offering real-time energy use information to residents and businesses; offer anonymized data on community energy use for residents to compare performance; and provide rewards or rebates for improved energy conservation.
- ▶ **Implementation Program X: GHG Strategy Implementation.** The County shall implement the General Plan GHG Strategy through specific policies, programs, and implementing actions integrated throughout the General Plan and summarized in Appendix B.
- ▶ **Implementation Program Y: GHG Strategy Monitoring.** The County shall implement, under the overall direction of the CEO and with support of RMA, PWA, GSA, AGC, FD, and other departments as appropriate, the GHG Strategy through specific policies, programs, and implementing actions integrated throughout the General Plan and summarized in Appendix B, Climate Action Plan, as well as other appropriate actions adopted from time to time. The GHG reduction strategy shall consist of a comprehensive program to systematically reduce GHG emissions to meet adopted emission reduction targets and deadlines from all sectors – transportation, buildings, solid waste, stationary sources, agriculture, water and wastewater, and off-road equipment.
- ▶ **Implementation Program Z: Public Reporting on GHG Strategy Progress.** The County shall prepare public reports on the results of GHG Strategy implementation and monitoring and present these reports to the Board of Supervisors. The first report shall be submitted to the Board of Supervisors two years after the approval of the General Plan, after which the Board of Supervisors will determine the appropriate reporting interval. The County shall also present a more detailed progress report to the Board of Supervisors, including results of the latest GHG inventory update, every five years.
- ▶ **Implementation Program AA: GHG Inventory Updates.** The County shall update the County's GHG emissions inventory at least every five years.
- ▶ **Implementation Program BB: GHG Strategy Amendments.** The County may amend the GHG Strategy to ensure that the County is on track to achieve its 2030 target and making substantial progress towards achieving its longer-term, post-2030 goals.
- ▶ **Implementation Program CC: Climate Emergency Council.** The County shall establish a Climate Emergency Council to advise the Board of Supervisors on climate action planning and implementation of the Climate Action Plan (CAP) goals, policies, and programs.
- ▶ **Implementation Program DD: Budget and Staffing Plan for CAP Implementation.** The CEO shall, within six months from the adoption of the General Plan Update and Climate Action Plan, present to the Board of Supervisors a proposed budget and staffing plan

(including qualified technical consultants) to implement the Climate Action Plan, and shall update the budget and staffing plan each year.

- ▶ **Implementation Program EE: Streamlining GHG Analysis for Projects Consistent with the General Plan.** Projects subject to environmental review under CEQA may be eligible for tiering and streamlining the analysis of GHG emissions, pursuant to CEQA Guidelines Section 15183.5, provided they incorporate applicable GHG reduction measures included in the GHG Strategy contained in the General Plan and Program EIR. The County shall review such projects to determine whether the following criteria are met:
  - Proposed project is consistent with the current General Plan land use designation and applicable zoning designations for the project site;
  - Proposed project incorporates all applicable GHG reduction measures (as documented in Appendix B to the General Plan and analyzed in the GHG Section of the Program EIR) into project design and/or as binding and enforceable mitigation measures in the project-specific CEQA document prepared for the project; and
  - Proposed project clearly demonstrates the method, timing and process for which the project will comply with applicable GHG reduction measures and/or conditions of approval.

The County may develop more specific tiering and streamlining tools or procedures, such as a consistency review checklist, or more detailed guidance for determining consistency with the GHG Strategy.

Similarly, the County may incorporate appropriate elements of such guidance and procedures into the County's Initial Study Assessment Guidelines (ISAGs).

#### Hazards and Safety Element

- ▶ **Policy HAZ-1.1: Fire Prevention Design and Practices.** The County shall continue to require development to incorporate design measures that enhance fire protection in areas of high fire risk. This shall include but is not limited to incorporation of fire-resistant structural design, use of fire-resistant landscaping, and fuel modification around the perimeter of structures.
- ▶ **Policy HAZ 1.2: Defensible Space Clear Zones.** The County shall require adherence to defensible space standards, or vegetation "clear zones," for all existing and new structures in areas that are designated as Hazardous Fire Areas by the Ventura County Fire Protection District and High Fire Hazard Severity Zones by the California Department of Forestry and Fire Protection.
- ▶ **Policy HAZ-1.3: Controlled Burns and Other Fire Prevention Measures.** The County shall continue to recognize the role of fire in local ecosystems by supporting controlled burns and other fire prevention measures.
- ▶ **Policy HAZ-1.4: Development in High Fire Hazard Severity Zones and Hazardous Fire Areas.** The County shall require the recordation of a Notice of Fire Hazard with the County Recorder for all new discretionary entitlements (including subdivisions and land use permits) within areas designated as Hazardous Fire Areas by the Ventura County Fire

Department or High Fire Hazard Severity Zones by the California Department of Forestry and Fire Protection (CAL FIRE).

- ▶ **Policy HAZ-1.6: Wildfire Risk Education.** The County shall continue to develop and distribute educational materials and conduct educational outreach activities informing the public about wildfire risk and protection strategies.
- ▶ **Policy HAZ-3.1: Sea Level Rise Planning and Adaptation.** The County shall continue to actively plan for sea level rise by using the best available science to analyze critical vulnerabilities, identify measures to conserve coastal resources, minimize impacts on residents and businesses, maintain public services, and strengthen resiliency.
- ▶ **Policy HAZ-3.2: County Infrastructure Projects and Sea Level Rise.** County-initiated infrastructure projects sited along or seaward of Highway 101, such as bridges and levees, that will provide 100 years or more of service, shall be planned with the potential to be easily modified to accommodate 100-years of projected sea level rise in accordance with the H++ extreme risk aversion sea level rise scenario.
- ▶ **Policy HAZ-3.3: Sea Level Rise Educational Outreach.** To the extent feasible, the County shall incorporate education elements into coastal adaptation projects to inform the public about the risks of sea level rise and options for adaptation.
- ▶ **Policy HAZ-10.1: Air Pollutant Reduction.** The County shall strive to reduce air pollutants from stationary and mobile sources to protect human health and welfare, focusing efforts on shifting patterns and practices that contribute to the areas with the highest pollution exposures and health impacts.
- ▶ **Policy HAZ-10.5: Air Pollution Impact Mitigation Measures for Discretionary Development.** The County shall work with applicants for discretionary development projects to incorporate bike facilities, solar water heating, solar space heating, incorporation of electric appliances and equipment, the use of zero and/or near zero emission vehicles and other measures to reduce air pollution impacts and reduce GHG (GHG) emissions.
- ▶ **Policy HAZ-10.6: Transportation Control Measures Programs.** The County shall continue to work with the Ventura County Air Pollution Control District (APCD) and Ventura County Transportation Commission (VCTC) to develop and implement Transportation Control Measures (TCM) programs consistent with the APCD's Air Quality Management Program (AQMP) to facilitate public transit and alternative transportation modes within the county.
- ▶ **Policy HAZ-10.7: Fuel Efficient County Vehicles.** When purchasing new County vehicles, the County shall give strong preference to fuel efficient vehicles, including the use of zero emission vehicles when feasible.
- ▶ **Policy HAZ-10.8: Alternative Transportation Modes.** The County shall promote alternative modes of transportation that reduce single-occupancy vehicle (SOV) travel and enhance "last-mile" transportation options to improve air quality.
- ▶ **Policy HAZ-11.1: Critical Vulnerable Infrastructure.** The County shall identify and protect critical infrastructure locations that are vulnerable to damage from extreme heat.

- ▶ **Policy HAZ-11.2: Climate Change-Related Partnerships.** The County shall partner with Southern California Association of Governments (SCAG), utilities, nonprofit organizations and other entities to implement future and ongoing heat-related climate change initiatives. The County's partnership in ongoing programs and future initiatives could include helping other organizations increase participation in existing programs through education and promotion, and by using and integrating them in County programs and activities, where feasible.
- ▶ **Policy HAZ-11.3: Limit Impacts of Climate Change on Designated Disadvantaged Communities.** The County shall work with public, private, and nonprofit partners to limit impacts of climate change on Designated Disadvantaged Communities by focusing planning efforts and interventions on communities with the highest need and ensuring representatives of these communities have a role in the decision-making process for directing climate change response.
- ▶ **Policy HAZ-11.4: Education and Outreach on Effects of Climate Change.** The County shall support efforts of agencies and organizations that provide effective education and outreach to Designated Disadvantaged Communities on the effects of climate change, including increasing temperatures, wildfires, flooding, sea level rise, poor air quality, extreme weather events, disease prevention, and other public health effects.
- ▶ **Policy HAZ-11.5: Outdoor Worker Protection.** The County shall work with State and County health agencies and local organizations to provide educational programs and resources targeted at reducing the impacts of exposure to sun and heat.
- ▶ **Policy HAZ-11.6: Accessible Cooling Centers.** The County shall expand partnerships with local governments, non-government organizations, churches, and businesses to provide additional cooling centers, particularly in designated disadvantaged communities.
- ▶ **Policy HAZ-11.7: Green Building Design Features.** The County shall encourage development to include retrofits to improve building performance and market value through strategic building design features, including insulation and strategic orientation of buildings to reduce energy usage, solar-reflective white roofs, solar panels, green roofs (vegetation on roofs), and battery storage for energy.
- ▶ **Policy HAZ-11.8: Undergrounding Utilities.** The County shall work with utility providers to underground overhead power lines (both existing and as part of discretionary development) to increase the resilience of the energy grid and reduce wildfire potential, especially in Existing Communities.
- ▶ **Policy HAZ-11.9: Urban Greening.** The County shall promote the use of urban greening techniques, such as cool pavement technology, parking lot shading, landscaping, and other methods to offset climate change impacts and reduce GHG emissions for discretionary development and County-initiated projects.
- ▶ **Policy HAZ-11.10: Solar Photovoltaic Carports.** The County shall promote the use of solar photovoltaic carports for discretionary development and County initiated projects.

## Implementation Programs

- ▶ **Implementation Program A: Develop and Implement Educational Programs for Wildfire Resilience.** In coordination with federal, state, and local partners (e.g., CAL FIRE), the County shall update and maintain educational programs related to such issues as:
  - Learning how to recognize the first signs of fire and take appropriate action;
  - Living with the risks of fire within the wildland/urban interface; and
  - methods of improving the resilience of homes and other structures.
- ▶ **Implementation Program B: Wildfire Vulnerability Assessment and Mapping.** In collaboration with the federal, state, and local partners (e.g., CAL FIRE), U.S. Forest Service, other agencies involved in wildfire response planning), the County shall update and map new locations that may be vulnerable to wildfire hazards including: damage to electrical, transportation, and communication infrastructure; increased rates of erosion, landslide, and water quality degradation; loss of residential, commercial, and industrial structures; and ecological disturbance.
- ▶ **Implementation Program F: Develop Climate Change Impact Assessment.** The County shall work with the Naval Base Ventura County (NBVC), other jurisdictions, the Oxnard Harbor District (OHD), California Department of Conservation, and the Department of Defense (DOD) to develop a Climate Change Impact Assessment that addresses issues related to climate change and military installations, including sea level rise, wildfires, and stormwater runoff intensities.
- ▶ **Implementation Program G: Communication Program for Property Owners At-Risk from Sea Level Rise.** The County shall seek funding to prepare and implement a communication program that periodically provides updates to the Board of Supervisors, and other stakeholders regarding impacts from sea level rise and planning decisions to address those impacts.
- ▶ **Implementation Program H: Sea Level Rise Analysis in Siting and Design of New Development.** The County shall consider the feasibility of amending the Non-Coastal Zoning Ordinance and Coastal Zoning Ordinance to require technical analysis of projected sea level rise exposure for the siting and design of new discretionary development.
- ▶ **Implementation Program I: Estuaries, Wetlands, and Groundwater Basins Resilience.** The County shall coordinate with regional stakeholders to assess vulnerabilities from the effects of, and opportunities to enhance the resiliency to, sea level rise on estuaries, wetlands, and groundwater basins. This assessment should consider factors that influence the conditions of an estuary or wetland, including sea level rise, rainfall, surface heat budget, wind, and ocean acidification.
- ▶ **Implementation Program P: Identify Critical Infrastructure Vulnerable to Extreme Heat.** The County shall map locations of county-owned facilities and infrastructure that may be vulnerable to the effects of extreme heat. When necessary, the County will develop a plan to upgrade such infrastructure to be more resilient to periods of high heat, which may include the use of heat-tolerant, reflective, or other resilient types of materials.

- ▶ **Implementation Program Q: Standards for Solar Photovoltaic (PV) Carports in County Lots.** The County shall establish standards for inclusion of solar PV carports in County-owned parking lots.
- ▶ **Implementation Program R: Adaptation Grant Funding.** The County shall apply for grant funding for climate change adaptation planning efforts from available private and public sources.
- ▶ **Implementation Program S: Extreme Heat Education and Outreach.** The County shall provide multilingual education and outreach to residents and businesses to publicize the symptoms and dangers of heat-related illness, cooling center locations, how to sign up for the Ready Ventura County VC Alert Program, worker-related protections, and practical methods for preventing heat-related illness during periods of high heat.
- ▶ **Implementation Program T: Cool Roof Ordinance.** The County shall adopt a Cool Roof Ordinance that exceeds the prescriptive cool roof requirements of the 2019 California Building Energy Efficiency Standard for Residential and Nonresidential Buildings by 25 percent (California Energy Code). Under a Cool Roof Ordinance, the County would require new construction to replace or re-coat 2,500 square feet for nonresidential and 1,250 square feet of roof space for residential buildings, or 72.5 percent or more of roofs.
- ▶ **Implementation Program U: Incentive Program for Passive Solar Home Design and Use of Green Roofs and Rooftop Gardens.** The County shall develop incentive programs to promote passive solar home design and the use of green roofs and rooftop gardens. The program shall include but may not be limited to, permit streamlining and permit fee reductions to apply passive solar home design to future residential buildings.
- ▶ **Implementation Program V: Cool Pavements Standards.** The County shall incorporate cool pavement standards into the County's development standards for County and private development projects, in both new construction and changes to existing on-site paved surface areas (e.g., parking lots, private roadways, other hardscapes).
- ▶ **Implementation Program W: Incentive Programs for Solar Photovoltaic (PV) Carports.** The County shall establish incentive programs, which may include rebate programs, permit fee reductions, and tax deductions, to incentivize the installation of solar photovoltaic (PV) carports in existing and future parking lots.

#### Agriculture Element

- ▶ **Policy AG-1. 1: Agricultural Land Protection and Preservation.** The County shall continue to protect and preserve agricultural land by directing growth away from productive agricultural lands into cities, unincorporated urban areas, or existing communities and by supporting the acquisition or voluntary dedication of agriculture conservation easements.
- ▶ **Policy AG-3. 2: Integrated Pest Management Practices.** The County shall encourage and support the use of Integrated Pest Management practices to reduce pesticide use and human health risks.

- ▶ **Policy AG-3. 3: Public Education for Agricultural Products and Integrated Pest Management.** The County shall collaborate with the agricultural community to provide information on Integrated Pest Management and agricultural products and practices in Ventura County.
- ▶ **Policy AG-4. 1: Connections to Local Produce.** The County shall strive to enhance access to and consumption of fresh, local produce by encouraging direct connections between local farmers/ranchers and markets, restaurants, institutions, schools, hospitals, food banks, and other businesses.
- ▶ **Policy AG-4. 3: Technological Innovation.** The County shall encourage the use of technology that supports agricultural production, while enhancing environmental sustainability and natural resource conservation.
- ▶ **Policy AG-4. 4: Pest Management.** The County shall continue to monitor leading research findings on methods and technologies for reducing harm to the agricultural sector from invasive plants, pests, and diseases and modify and expand agricultural practices when appropriate and feasible.
- ▶ **Policy AG-5. 1: Inorganic Nitrogen Based Fertilizers.** The County shall encourage farmers to reduce fertilizer application and transition to products that reduce or avoid nitrous oxide emissions, such as organic composting and enhanced efficiency fertilizers.
- ▶ **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 stand-by charges.
- ▶ **Policy AG-5. 4: Alternative Irrigation Techniques.** The County shall encourage farmers to continue and enhance the water-saving irrigation techniques designed to reduce water consumption.
- ▶ **Policy AG-5. 5: Carbon Farming Practices.** The County shall encourage and support the efforts of resource conservation districts, farmers, and other stakeholders to expand carbon farming practices, such as reduced tilling, cover-cropping, composting, biochar, and other activities that both reduce GHG emissions and increase carbon sequestration and storage, when feasible.
- ▶ **Policy AG-6. 1: Monitor Climate Change Research.** The County shall support and monitor research on the effects of a changing climate on the agricultural industry within Ventura County.
- ▶ **Policy AG-6. 2: Crop Resiliency.** The County shall engage the agricultural sector to understand the tolerance of current crop mixes to withstand the impacts of climate change, including increased temperatures, disease, and pests, and explore options to diversify crops.

### Implementation Programs

- ▶ **Implementation Program B: Regionally-Grown Products Sales Incentives.** The County shall develop a program that encourages sales and distribution of regionally-grown (in Ventura County or neighboring counties of Los Angeles, Santa Barbara, or Kern) produce to local retailers, restaurants, and markets, and encourage chain stores to develop local distribution centers. The program will encourage residents to select locally grown food products for freshness, local economic development benefits, and reduced GHG emissions.
- ▶ **Implementation Program C: County Procurement.** The County shall develop a program to identify opportunities to continue to provide organic and locally grown foods into cafeteria services, the jail, Ventura County Medical Center, and other County-sponsored services and events that provide food service, to the extent feasible.
- ▶ **Implementation Program D: Agricultural Tourism Development Standards.** The County shall revise the Non-Coastal Zoning Ordinance to include regulations and development standards for agricultural tourism while protecting both the grower and the public. Ordinance revisions may also include additional development standards for agricultural promotional uses, if necessary.
- ▶ **Implementation Program E: Specialty Farming Education.** The County shall continue to collaborate with and support the UC Cooperative Extension Office on education programs that inform and assist local farmers, ranchers, and agricultural managers in diversifying and establishing expertise in specialty agricultural products.
- ▶ **Implementation Program F: Enhanced Access to Locally Grown Products.** The County shall conduct a study to identify barriers to local farm stands and take action to remove these barriers as part of the next update to the Non-Coastal Zoning Ordinance.
- ▶ **Implementation Program G: Farm-to-Front Door.** The County shall study the feasibility of encouraging “Farm-to-Front Door” business model and its potential benefits to businesses and residents in Ventura County.
- ▶ **Implementation Program H: Nutrient Management Plans.** The County shall continue to collaborate with the UC Cooperative Extension Office and UC Agriculture and Natural Resources to implement Nutrient Management Plans for commonly grown local crops featuring best management practices for nitrous oxide emission reductions.
- ▶ **Implementation Program I: Fossil Fuel-Powered Equipment Replacement.** The County shall coordinate with the Air Pollution Control District and electric utilities to develop a program to establish a countywide fossil fuel-powered equipment conversion target, track progress on conversions to renewable energy sourced electric powered systems and provide technical assistance to users considering replacement of pumps.
- ▶ **Implementation Program J: Alternative Fuel Funding for Agricultural Operations.** The County shall coordinate with the Air Pollution Control District to develop a program to identify funding sources or develop financial or regulatory incentives to encourage the switch to electric or alternatively fueled agricultural equipment, when feasible.

- ▶ **Implementation Program K: Water-Saving Irrigation Techniques Program.** The County shall continue to collaborate with and support the UC Cooperative Extension Office on educational programs on irrigation techniques to maximize water use efficiency, when feasible.
- ▶ **Implementation Program L: Encourage and Facilitate Carbon Farming.** The County shall develop a program to encourage and facilitate carbon farming projects, including development of demonstration projects and site-specific carbon farm plans, to guide implementation of carbon farming practices throughout the county, when feasible.
- ▶ **Implementation Program M: Biogas Control Systems.** The County shall review and update regulations to allow the development of appropriate biogas facilities near the source of organic waste materials and develop a program to coordinate public-private local investment in biogas control systems to encourage their development.
- ▶ **Implementation Program N: Research on Effects of Climate Change.** The County shall research the potential effects of climate change on the county's existing agricultural industry as well as the resulting challenges and opportunities associated with these changes. Research partners may include the California Climate and Agriculture Network (CalCAN), University of California Cooperative Extension, Ventura County Farm Bureau, and the Agricultural Commissioner's Office. The research shall address, but may not be limited to, loss of chill hours, increased populations of or new species of pests, higher rates of evapotranspiration, and opportunities created by warmer climate to grow crops that were previously unsuitable based on historic climate conditions.
- ▶ **Implementation Program O: Subsidies for Resilient Crop Production.** The County should encourage programs and obtains grants to seek funding to subsidize efforts to breed crops that are resilient to high heat, shade crops and installation of light reflectors, and reduce rates of tilling to promote soil health and combat increased temperatures as recommended by federal, state, and local agencies.

#### Water Resources Element

- ▶ **Policy WR-3.1: Non-Potable Water Use.** The County shall encourage the use of non-potable water, such as tertiary treated wastewater and household graywater, for industrial, agricultural, environmental, and landscaping needs consistent with appropriate regulations.
- ▶ **Policy WR-3.2: Water Use Efficiency for Discretionary Development.** The County shall require the use of water conservation techniques for discretionary development, as appropriate. Such techniques include low-flow plumbing fixtures in new construction that meet or exceed the state Plumbing Code, use of graywater or reclaimed water for landscaping, retention of stormwater runoff for direct use and/or groundwater recharge, and landscape water efficiency standards that meet or exceed the standards in the California Model Water Efficiency Landscape Ordinance.
- ▶ **Policy WR-3.3: Low-Impact Development.** The County shall require discretionary development to incorporate low impact development design features and best management practices, including integration of stormwater capture facilities, consistent with County's Stormwater Permit.

- ▶ **Policy WR-3.4: Reduce Potable Water Use.** The County shall strive for efficient use of potable water in County buildings and facilities through conservation measures, and technological advancements.
- ▶ **Policy WR-4.1: Groundwater Management.** The County shall work with water suppliers, water users, groundwater management agencies, and groundwater sustainability agencies to implement the Sustainable Groundwater Management Act (SGMA) and manage groundwater resources within the sustainable yield of each basin to ensure that county residents, businesses, agriculture, government, and the environment have reliable, high-quality groundwater to serve existing and planned land uses during prolonged drought years.
- ▶ **Policy WR-4.3: Groundwater Recharge Projects.** The County shall support groundwater recharge projects and multi-benefit consistent with the Sustainable Groundwater Management Act and the Integrated Regional Water Management Plan to ensure the long-term sustainability of groundwater.
- ▶ **Policy WR-4.4: In-Stream and Recycled Water Use for Groundwater Recharge.** The County shall encourage the use of in-stream water flow and recycled water for groundwater recharge while balancing the needs of urban and agricultural uses, and healthy ecosystems, including in-stream waterflows needed for endangered species protection.
- ▶ **Policy WR-6.1: Water for Agricultural Uses.** The County should support the appropriate agencies in their efforts to effectively manage and enhance water quantity and quality to ensure long-term, adequate availability of high quality and economically viable water for agricultural uses, consistent with water use efficiency programs.
- ▶ **Policy WR-6.2: Agricultural Water Efficiency.** The County should support programs designed to increase agricultural water use efficiency and secure long-term water supplies for agriculture.
- ▶ **Policy WR-6.3: Reclaimed Water Use.** The County should encourage the use of reclaimed irrigation water and treated urban wastewater for agricultural irrigation in accordance with federal and state requirements in order to conserve untreated groundwater and potable water supplies.

#### Implementation Programs

- ▶ **Implementation Program C: Regional Collaboration on Water issues and Sustainability.** The County shall continue to provide data and staff resources to support collaboration on climate change and sustainability, and for planning and implementing projects that address local and regional water issues.
- ▶ **Implementation Program E: Well Guidelines Update.** The County shall coordinate with the local groundwater management agencies and local groundwater sustainability agencies to update County of Ventura Ordinance 4468 and related guidelines on the location, construction, and abandonment of water wells, if necessary.
- ▶ **Implementation Program F: Discretionary Development Review for Adequate Water and Wastewater.** The County shall verify that all discretionary development proposals demonstrate an adequate long-term supply of water, adequate methods for sewage disposal, provide adequate drainage to avoid flooding, prevent erosion, and prevent contamination of local water.

- ▶ **Implementation Program G: Water Conservation.** The County shall work with the state and local water suppliers to educate County residents and offer incentives for water conservation features, including drought-tolerant landscaping, removal of turf, graywater, and water-saving plumbing technologies.
- ▶ **Implementation Program H: County Water Efficiency.** The County shall review water usage at County-owned facilities and from County operations and develop recommendations for water saving practices and facility improvements, including turf removal to conserve water.

#### Economic Vitality Element

- ▶ **Policy EV-4.4: Renewable Energy Facilities.** The County shall identify appropriate locations to allow for development of renewable energy generation and storage facilities and encourage the development of innovative approaches to renewable energy deployment, including solar power, wind power, wave energy, distributed power systems and micro-grids, and other appropriate renewable sources and storage and distribution systems.

## ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

### Impact 4.8-1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and one dwelling unit per parcel. Other uses include uses such as composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres.

Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

Future development that would be accommodated by the 2040 General Plan, as described above, would result in construction and operation-related GHG emissions that contribute to climate change on a cumulative basis. Detailed construction information for individual projects is unknown at this time, but would typically involve the use of heavy-duty equipment, construction worker commute trips, material deliveries, and vendor trips. These activities would result in GHG emissions limited in duration for any given project, but when taken together over buildout of the 2040 General Plan, could be considerable. Long-term operational sources of GHG emissions associated with the 2040 General Plan would include mobile sources (e.g., vehicle exhaust), energy consumption (e.g., electricity and natural gas), solid waste (e.g., emissions that would occur at a landfill associated with solid waste decomposition), wastewater treatment, and water consumption (e.g., electricity used to deliver and treat water consumed by customers in the plan area). Because GHG emissions from vehicles are one of the largest sources of GHG emissions in the plan area (36 percent), VMT is an important metric to help measure progress toward reducing GHG emissions. Growth assumptions relied upon for the GHG emissions projections are presented in Table 4.8-4.

**Table 4.8-4 Population, Employment, Housing, and Vehicle Miles Traveled in Unincorporated Ventura County, 2015 through 2040**

	2015	2020	2030	2040
Population	97,733	99,755	100,918	101,832
Employment	32,889	32,988	34,556	35,875
Housing	32,191	32,446	32,959	33,472
VMT	1,807,658,790	1,837,739,017	1,897,899,472	1,958,059,926
VMT-per Capita	18,495	18,423	18,806	19,228

Under the business-as-usual scenario adjusted for federal and State climate and energy legislation, as described above in the methodology subsection, GHG emissions in unincorporated Ventura County are projected to decrease from 1,793,971 MT CO<sub>2e</sub> in 2020 to 1,540,630 MT CO<sub>2e</sub> in 2040, a decrease of 253,341 MT CO<sub>2e</sub> or 14 percent (as shown in Table 4.8-2). Between 2015 and 2040, GHG emissions are projected to decrease from 1,897,112 MT CO<sub>2e</sub> to 1,540,630 MT CO<sub>2e</sub>, a decrease of or 356,482 MT CO<sub>2e</sub> or 19 percent.

These GHG reductions are due to State and federal implementation of legislation with local benefits, such as increases to the pace and scale of renewable energy generation replacing fossil-fuel power plants in compliance with RPS mandates, local implementation of actions associated with CARB's Short-Lived Climate Pollutant Strategy, and improvements to the fuel economy of new motor vehicles resulting from implementation of the State's Advanced Clean Cars Program. While these regulations result in meaningful GHG reductions at the local level, additional actions, local or otherwise, would be needed to meet the GHG 2030 reduction target of 41 percent below 2015 levels by 2030, as identified in the 2040 General Plan under Policy COS-10.2.

To achieve these additional GHG reductions through local action, the 2040 General Plan includes 118 policies and 45 implementation programs that are intended to regulate activities contributing to GHG emissions in the county. These policies and programs regulate new development and/or existing activities, infrastructure, and facilities contributing to GHG emissions. Some of the policies addressing GHG emissions have been carried over from the Area Plans as described in Appendix B, Table B-10 of the 2040 General Plan. Of the CAP components, 46 policies and 31 implementation programs would have both GHG reduction and climate change adaptation co-benefits. Some degree of GHG reduction can be anticipated from these policies and implementation programs due to the reduction or modification of GHG-generating activities occurring countywide. These changes occur directly through the implementation of programs or through policies which provide a pathway for future discretionary development to occur with less GHG emissions than would likely occur under existing conditions. The policies and implementation programs contained within the 2040 General Plan are designed to reduce consumption patterns or transition consumption to resources that produce less CO<sub>2</sub>e. The efficacy of these policies and programs is additionally supported by the examples of local actions that can be used to achieve the State's climate goals provided by CARB in Appendix B of the 2017 Scoping Plan (CARB 2017).

The actual benefit accrued for many of these policies and implementation programs cannot be quantified at this time and in advance of 2040 General Plan adoption because data are not available or the degree to which residences and businesses are likely to participate is unknown. Many of the policies and programs are designed to encourage, promote or support the public with performing certain actions because the County does not have the regulatory authority to require individuals to comply. The quantified measures shown in Table 4.8-5 are exceptions, where data on consumption and participation rates are available to estimate the GHG reductions associated with implementation of the actions by 2030.

Table 4.8-5 summarizes the policies and programs that would have quantifiable GHG reductions by 2030, and the assumptions made for estimating these GHG emissions reductions. However, as stated above, other policies and implementation programs would result in GHG reductions, but the specific amount cannot be determined at this time and would be speculative.

**Table 4.8-5 Quantified GHG Reductions**

<b>Program / Policy</b>	<b>2030 GHG Reductions – MT CO<sub>2</sub>e</b>	<b>Assumptions</b>
AG-H: Nutrient Management Plans	33,830	Replace inorganic nitrogen fertilizer with organic fertilizer from locally sourced organic waste – 25 percent replacement by 2030.
COS-8.4: Clean Power Alliance	59,972	Community Choice Aggregation Program increases enrollment in Green Choice Program (100 percent renewable electricity) to 95 percent of all residential and commercial customers by 2030.
COS-H: County Tree Planting Program	354	Tree planting program, 1,000 annually for 10,000 new trees by 2030.
COS-S: Building Code Update	2,019	Enhance energy efficiency of new residential and commercial construction and major retrofits over standard Title 24 building code. All new residential construction all-electric by 2030 with solar photovoltaic panels sized to offset annual electricity demand.
COS-W: Energy Efficiency and Conservation Program	5,042	Behavior change energy efficiency program results in residential energy savings; 5 percent reduction in commercial building energy use.

Program / Policy	2030 GHG Reductions – MT CO <sub>2</sub> e	Assumptions
CTM-B: Initial Study Assessment Guidelines	5,042	15 percent VMT reduction from new development (relative to a 2030 business as usual scenario) through incorporation of VMT thresholds into the ISAG pursuant to SB 743 implementation.
CTM-C: Vehicle Miles Traveled (VMT) Reduction Program	47,231	After accounting for the 15 percent VMT reduction from new development per CTM-B, this measure would achieve an additional 5 percent overall reduction in VMT by 2030, and 10 percent by 2040 (relative to 2030 and 2040 business as usual scenarios, respectively).
<b>Total</b>	<b>151,903</b>	

Implementation of the quantified policies and programs in Table 4.8-5 would collectively provide reductions of 151,903 MTCO<sub>2</sub>e by 2030, an approximate 9 percent reduction from forecast 2030 levels and 30 percent of the reductions needed to meet a target of 1,113,972 MT CO<sub>2</sub>e for consistency with emissions targets identified in Policy COS-10.2 (41 percent below 2015 levels by 2030). An additional 361,250MT CO<sub>2</sub>e of reductions would be needed to close the gap with the 2030 target.

The 2040 General Plan’s policies and programs contained in Table 4.8-6 provide qualitative GHG reduction benefits consistent with Section 15064.4 of the State CEQA Guidelines, which states that lead agencies may describe or estimate the amount of GHG resulting from a project based on qualitative analyses or performance-based standards at the agency’s discretion. The aggregate GHG reduction benefits of qualitative and quantitative measures can be evaluated, and adjusted if needed in future years through the implementation and monitoring actions described in Program COS-Y, Program COS-BB, and Policy LU-22.2. This approach is in line with the State CEQA Guidelines, Section 15183.5, which explains in part that a GHG reduction plan’s performance should be monitored and amendments should be made as necessary if specified levels of GHG reduction are not being achieved.

Table 4.8-6 provides an overview of 2040 General Plan programs that would result in additional GHG emissions reductions, and achieve additional progress toward meeting the 2030 GHG reduction target. This table also explains how these programs would result in GHG emissions reductions.

**Table 4.8-6 CAP Programs with Qualitative GHG Reduction Benefits by Sector**

Program ID	GHG-Emitting Sector							Analysis of Program’s GHG Reduction Potential
	Agriculture	Building Energy	Off-Road	Waste	Stationary Sources	Transportation	Water	
AG-B	X					X		Reduce VMT by substituting food transported from outside of the county with locally produced food.
AG-C	X					X		Reduce VMT by substituting food transported from outside of the county with locally produced food. Organic growing techniques reduce the use of inorganic fertilizer with higher GHG emissions.
AG-E	X							Encourage farmers to adopt organic growing techniques.

Program ID	GHG-Emitting Sector							Analysis of Program's GHG Reduction Potential
	Agriculture	Building Energy	Off-Road	Waste	Stationary Sources	Transportation	Water	
AG-G	X							Feasibility study should also include an assessment of GHG emissions associated with the local distribution of products to individual households.
AG-I	X		X				X	Transition farm equipment to electrically powered equipment. Convert diesel-consuming water pumps to solar powered pumps.
AG-J	X						X	Transition farm equipment to electrically powered equipment. Convert diesel-consuming water pumps to solar powered pumps.
AG-K	X						X	Reduce the amount of water that needs to be treated, pumped and conveyed, which requires the use of energy.
AG-L	X			X				Encourage the capture and storage of concentrated carbon in soils from farm waste and woody biomass; practices, improve soil health and reduce the need to apply inorganic fertilizers.
COS-C	X	X		X				Improve the energy efficiency of buildings by reducing heat transfer into buildings and urban heat island effects. Preserving trees aids sequestration of carbon dioxide. Limits the disposal of woody biomass in landfills.
COS-H	X	X						Improve the energy efficiency of buildings by reducing heat transfer into buildings and urban heat island effects. Planting trees aids sequestration of carbon dioxide.
COS-M					X			Increased taxes on oil and gas facilities may reduce oil and gas production, and GHG emissions associated with the process.
COS-N		X					X	Increase the energy efficiency of buildings and using building products derived from recycled materials.
COS-O		X						Establish zones for the development of utility-scale renewable energy facilities.
COS-P		X						Study can be used to show GHG reduction benefits, cost-effectiveness, and energy savings potential of reach codes. These analyses are needed for adopting an Energy Reach Code.
COS-Q		X						Reduce costs for renewable energy development to expand local capacities for zero-carbon electricity generation.
COS-R		X						Enhance energy efficiency of new residential and commercial construction and major retrofits over standard Title 24 building code.
COS-S		X						Adopt a reach code that supports the construction of all-electric new residential buildings with consumption offset by solar photovoltaic panels.
COS-T		X						Reduce GHG emissions by reducing energy demand by improving the energy efficiency of county owned buildings.
COS-U		X						Expand local capacity for zero-carbon electricity generation.
CTM-A						X		Establish fees that encourage projects to be designed to minimize traffic impacts, specifically VMT reduction. Invest revenues generated from program into improvement projects that reduce VMT and associated consumption of fossil fuels from on-road vehicle use.
CTM-I						X		Complete Street Guidelines and Standards improve the safety and functionality of pedestrian and cycling infrastructure, encouraging residents to use alternative modes of transportation, replacing trips made by motor vehicles requiring the combustion of GHG emitting fossil fuels.

Program ID	GHG-Emitting Sector							Analysis of Program's GHG Reduction Potential
	Agriculture	Building Energy	Off-Road	Waste	Stationary Sources	Transportation	Water	
CTM-J						X		The Vision Zero initiative is intended to result in safer roadways and cycling infrastructure, to increase the appeal and participation in modes of transportation with zero carbon emissions as an alternative to motor vehicle use.
CTM-K						X		The Safe Routes to School programs is intended to result in safer roadways and cycling infrastructure, to increase the appeal and participation in modes of transportation with zero carbon emissions as an alternative to motor vehicle use.
CTM-L						X		The Master Bicycle Network plan is designed to expand the network of cycling lanes to important infrastructure and encourage modes of transportation with zero carbon emissions as an alternative to motor vehicle use.
CTM-M						X		The Bicycle Wayfinding Plan is designed to expand cycling infrastructure to neighboring communities and reduce VMT-related GHG emissions that occur as a result of trips between the unincorporated county and neighboring jurisdictions.
CTM-N						X		Provide micro-mobility options that encourage alternative modes of transportation by resolving the "last-mile" dilemma, which is a barrier to widespread use of public transportation and perpetuation of motor vehicles a preferred transportation mode.
CTM-O						X		Requires the county to prepare required feasibility studies for the adoption of energy reach codes, which reduce GHG emissions through energy efficiency and fuel substitution in newly constructed buildings.
HAZ-Q		X				X		Expand local capacity for zero-carbon electricity generation.
HAZ-T		X						Enhance energy efficiency of new residential and commercial construction and major retrofits over standard Title 24 building code.
HAZ-U		X						Enhance energy efficiency of new residential and commercial construction and major retrofits over standard Title 24 building code.
HAZ-V		X						Enhance energy efficiency of new residential and commercial construction and major retrofits over standard Title 24 building code.
HAZ-W		X						Expand local capacity for zero-carbon electricity generation.
LU-A		X				X		Improve the energy efficiency of buildings by promoting compact, multi-family housing. Improved energy efficiency reduces the consumption of fossil fuels which are combusted on-site using natural gas and propane, or to create electricity supplied via electrical grid. Limiting sprawl can also support GHG reductions by requiring less driving between destinations, thus reducing VMT and the fuel consumption associated with on-road transportation.
PFS-A		X				X		Requires the county to update capital improvement programs to include measures to reduce GHG emissions, in conformance the adopted programs and policies included in the General Plan targeting publicly owned facilities, including PFS-E, PFS-F, PFS-G, PFS-J, PFS-K, PFS-L, PFS-1.10, PFS-2.1, PFS-2.2, PFS-2.3, PFS-2.4, PFS-2.5, PFS-2.6, PFS-2.8, PFS-5.4, PFS-5.5, PFS-5.6, PFS-7.6, PFS-12.4.

Program ID	GHG-Emitting Sector							Analysis of Program's GHG Reduction Potential
	Agriculture	Building Energy	Off-Road	Waste	Stationary Sources	Transportation	Water	
PFS-E				X				By requiring the use of recycled materials in procurement purchases, the County is supporting the diversion of materials away from landfills where GHG emissions may be released as waste decomposes. Procurement of recycled materials also reduces the energy and water associated with manufacturing new goods from raw materials.
PFS-F		X				X		Reduce reliance on fossil fuels for transportation by providing electric vehicle charging at county facilities, supplementing vehicle fleets with electric vehicles, and encouraging employees to use alternative modes of transportation.
PFS-G							X	CAP implementation and updates in conformance with CEQA Guidelines Section 15183.5.
PFS-J							X	Reduce fugitive GHGs occurring from improperly functioning wastewater treatment systems at homes.
PFS-K							X	Reduce fugitive GHGs occurring from improperly functioning industrial-scale wastewater treatment systems.
PFS-L				X				Divert organic waste from landfills, where they decay over time and create methane emissions. Supplements waste recovery efforts of SB 1383 Statewide Organic Waste Diversion Program.
WR-C	X							Provisioning of water data and participation in stakeholder collaboration has been identified as an important component of achieving water conservation and sustainability goals (Cantor et. al 2018).
WR-G							X	Reduce the amount of water that needs to be treated, pumped and conveyed which requires the use of energy.
WR-H							X	Reduce the amount of water that needs to be treated, pumped and conveyed which requires the use of energy.

As shown in Table 4.8-6, each of the GHG-emitting sectors is addressed by implementation programs that target the activities within those sectors that result in GHGs.

For the agricultural sector, Implementation Programs AG-E and AG-H would be implemented to promote organic growing techniques that reduce reliance on inorganic fertilizers, which contain volatile nitrogen compounds that are potent GHGs, represented as nitrous oxides in the County's GHG accounting. Implementation Programs AG-B, AG-C, AG-G, AG-I, AG-K, and AG-J would reduce GHG emissions by targeting the GHG emissions associated with the hauling and production of food. Encouraging the local consumption of locally produced foods, as an alternative to foods that are shipped from other parts of the State, country, or from international sources can reduce the distance food products travel to reach the consumer, which translates into a decrease in GHG emissions (Weber and Matthews 2009). The use of electric-powered equipment for farming can reduce the use of fossil fuels from heavy-duty off-road equipment and from water pumping associated with crop production. Carbon sequestration is also present in Implementation Program AG-L, which directs the County to develop a carbon farming pilot program to capture and store concentrated carbon in soils, with the added benefit of improving soil health (Kane 2015, Marin Carbon Project 2018).

Programs to reduce GHG emissions from the Building Energy sector include guidelines and requirements for green building techniques in new construction in Implementation Programs COS-N, COS-R, HAZ-T, HAZ-U, and HAZ-V; landscaping to promote energy efficiency in Implementation Programs COS-C and COS-H; energy conservation programs for existing buildings through behavior modification and retrofitting in Implementation Programs COS-W; and energy reach codes in Implementation Programs COS-S and COS-P, which provide the requisite analyses for adopting the zero net energy and zero carbon building reach code as specified in Policy COS-8.6. Programs are also in place to increase local capacity for renewable energy for both utility-scale and distributed generation under Implementation Programs COS-O, COS-Q, COS-U, and HAZ-W. The increased production of renewable energy reduces the carbon intensity of electricity consumed by buildings.

The green building and retrofitting programs (Implementation Programs COS-N, COS-R, and COS-W) do not mention applicability to industrial buildings, though the GHG benefits of energy conservation applied through these programs to residential and commercial buildings, could be applied to industrial as well. Under Implementation Program COS-L, the County would evaluate the feasibility of an excise tax on oil and gas operations, which would be intended to partially fund the County's response to climate change impacts. These taxes would presumably be in addition to fees already collected by the County for these activities. Before an oil excise tax could be levied, it would need to be approved by both the Board of Supervisors and at least a majority vote of the electorate.

GHG emissions from on-road transportation are addressed by Implementation Programs CTM-B and CTM-C, which are designed to reduce new and existing VMT resulting from forecast growth that would be accommodated by the 2040 General Plan, as well as reductions to baseline VMT from the levels identified in the 2015 GHG Inventory. Encouraging alternative modes of transportation, with an emphasis on walking and cycling, are the focus of achieving GHG reductions under Implementation Programs CTM-A, CTM-I, CTM-J, CTM-K, CTM-L, CMT-M and CTM-O.

Programs supporting GHG reduction in the water sector are targeted at efficiency improvements and fuel substitution for water pumping and conveyance in the agricultural sector through Implementation Programs AG-I, AG-J, and AG-K. Water conservation in new construction is addressed through the "whole systems" approach to sustainable building practices promoted under Implementation Program COS-N and increased use of non-potable water for irrigation through Implementation Program WR-G. Improvements to the efficiency of wastewater treatment systems are addressed in Implementation Programs PFS-G, PFS-G, and PFS-K, which would reduce GHGs by reducing the intensive energy demands and methane emissions associated with these processes.

In addition to the programs described in Table 4.8-6, the 2040 General Plan also includes policies and programs to reduce wildfire hazards through Implementation Programs HAZ-A and HAZ-B. These programs are intended to protect assets, populations, and wildlife while reducing the future risk of catastrophic fires. Although wildfires are not included in the County's 2015 GHG inventory because a standard accounting protocol is not available and wildfires occur intermittently rather than year-to-year, they have been estimated to cause substantial GHG emissions in years when they do occur. The 2017 Thomas Fire, which covered large portions of the unincorporated County, was estimated to release 3.6 million metric tons of carbon dioxide into the atmosphere (Anderson 2018), double the 1.79 million metric tons CO<sub>2e</sub> that are forecast to be generated from all major emissions sources in the County in 2020.

Thus, the prevention of wildfires, as addressed within the 2040 General Plan, can play a key role in minimizing future GHG emissions occurring within the county.

The planting of new trees under Implementation Program COS-H also has an important role in mitigating GHG emissions. This measure specifies the planting of 20,000 new trees on County-owned properties by 2040, which can reduce GHG emissions by increasing the energy efficiency of buildings (McPherson 1999) and has the potential to mitigate local GHG emissions by sequestering CO<sub>2</sub> from the atmosphere (USFS 2019).

While the programs included in the 2040 General Plan cover each of the sectors contributing to GHG emissions in the County, not all of the policies intended for GHG reduction have associated programs that would put these policies into action. Of the 118 policies identified for GHG reduction, 52 are not linked to an implementation program, as shown in Table 4.8-7.

**Table 4.8-7 GHG-Reducing Policies Not Associated with Implementation Programs**

GP Policy Element	Policy
Land Use	LU-11.3, LU-11.4, LU-16.5, LU-16.9, LU-18.5
Circulation, Transportation	CTM-2.5, CTM-2.6, CTM-2.7, CTM-2.8, CTM-2.9, CTM-2.11, CTM-2.17, CTM-2.22, CTM-2.24, CTM-2.25, CTM-2.27, CTM-6.1, CTM-6.3, CTM-6.4, CTM-6.5, CTM-6.6, CTM-6.7
Public Facilities	PFS-1.10, PFS-2.2, PFS-2.3, PFS-2.6, PFS-5.5, PFS-5.6, PFS-6.4, PFS-7.2, PFS-7.6, PFS-12.4
Conservation	COS-1.13, COS-2.10, COS-3.3, COS-5.3, COS-7.2, COS-7.4, COS-7.8, COS-8.2, COS-8.3, COS-8.4, COS-8.10, COS-9.1, COS-9.3
Hazard	HAZ-10.1, HAZ-1.3, HAZ-1.4, HAZ-10.1, HAZ-10.5, HAZ-10.6, HAZ-10.7, HAZ-10.8, HAZ-11.9
Agriculture	AG-1.1, AG-3.2, AG-4.3, AG-4.4
Water	WR-4.4, WR-6.1, WR-6.2, WR-6.3
Economic Vitality	EV-4.4

Programs are necessary for estimating targeted GHG reductions for 2030 and beyond, because the programs provide steps that County staff would take to implement a policy and realize the reduction potential. Many of the policies identified would support GHG reduction measures as part of future development under the 2040 General Plan but would not, on their own, specify the detailed steps that would be needed to achieve GHG reduction. Though these policies do not have implementation programs associated with them, they are still appropriate for inclusion in the 2040 General Plan, which is a programmatic document intended to provide general guidance to local decision makers for future actions. As a result, the policies, while supportive of future GHG reduction measures, do not contain enough specificity for their numeric contribution to the established 2030 and 2040 targets to be quantified. This impact would be **potentially significant**.

### Mitigation Measures

Mitigation Measure GHG-1: New Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development

The County shall include the following new implementation program in the 2040 General Plan.

### **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.

Mitigation Measure GHG-2: New Implementation Program HAZ-X: Building Energy Saving Ordinance for Industrial Buildings

The County shall include the following new implementation program in the 2040 General Plan.

### **Implementation Program HAZ-X: Building Energy Saving Ordinance for Industrial Buildings**

To address GHG emissions associated with electricity consumption by industrial buildings, which were not quantified in the GHG Inventory and Forecasting due to utility privacy rules, the County shall implement a program to adopt a Building Energy Saving Ordinance for industrial buildings over 25,000 square feet in size, modeled after the local benchmarking ordinances adopted in other local jurisdictions in California (CEC 2019). The County shall prepare reports showing the energy performance of industrial buildings relative to similar buildings in California and the United States and make these reports available to the public by request. The County, through their building department shall provide recommendations on energy efficiency retrofits and green building strategies to improve energy performance to property owners and tenants subject to the reporting requirements.

Mitigation Measure GHG-3: Do Not Include Implementation Program COS-EE in the 2040 General Plan

The County shall not include Implementation Program COS-EE in the 2040 General Plan.

~~► **Implementation Program COS-EE: Streamlining GHG Analysis for Projects Consistent with the General Plan.** Projects subject to environmental review under CEQA may be eligible for tiering and streamlining the analysis of GHG emissions, pursuant to CEQA Guidelines Section 15183.5, provided they incorporate applicable GHG reduction measures included in the GHG Strategy contained in the General Plan and Program EIR. The County shall review such projects to determine whether the following criteria are met:~~

- ~~▪ Proposed project is consistent with the current General Plan land use designation and applicable zoning designations for the project site;~~
- ~~▪ Proposed project incorporates all applicable GHG reduction measures (as documented in Appendix B to the General Plan and analyzed in the GHG Section of the Program EIR) into project design and/or as binding and enforceable mitigation measures in the project-specific CEQA document prepared for the project; and,~~

- ~~Proposed project clearly demonstrates the method, timing and process for which the project will comply with applicable GHG reduction measures and/or conditions of approval.~~

~~The County may develop more specific tiering and streamlining tools or procedures, such as a consistency review checklist, or more detailed guidance for determining consistency with the GHG Strategy.~~

~~Similarly, the County may incorporate appropriate elements of such guidance and procedures into the County's Initial Study Assessment Guidelines (ISAGs).~~

Mitigation Measure GHG-4: New Implementation Program HAZ-X: Greenhouse Gas Reduction Policy Enhancement Program

The County shall include the following new implementation program in the 2040 General Plan.

**Implementation Program HAZ-X: Greenhouse Gas Reduction Policy Enhancement Program**

The Climate Emergency Council that would be established under COS-CC shall develop recommended subprograms which implement the 52 policies identified in Table 4.8-8 that do not have associated implementation programs in the 2040 General Plan. Any recommendations that would require amendments to the General Plan, including any subprograms that may include expansions to programs already proposed in the 2040 General Plan, shall be provided to the County Planning Director. The Planning Director shall include the recommendation in a report for consideration by the Planning Commission and Board of Supervisors.

**Mitigation Measure CTM-1: New Implementation Program CTM-X: Interim VMT CEQA Assessment Criteria**

**Mitigation Measure CTM-2: Revised Implementation Program CTM-B: Initial Study Assessment Guidelines**

**Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program**

Significance after Mitigation

Regarding Mitigation Measure GHG-1, Implementation Program COS-S directs the County to update the building code to include reach codes that require new construction and major alterations to existing structures to exceed the mandatory energy performance requirements set by the 2019 building code in Title 24. Mitigation Measure GHG-1 would implement Policy COS-8.6, which states that the County will encourage zero net carbon emissions building design, which was assumed for quantifying GHG reduction benefits of the program. Adoption of a reach code is predicated on approval of a cost-effectiveness study by the CEC, pursuant to Public Resources Code Section 25402.1(h)2. Reliance on a CEC approval before the County can approve a reach code places the decision making for implementation of this program outside of the County's control, and thus, it is not certain that the goals of Implementation Program COS-S and Policy COS-8.6 would otherwise be achieved. To support the proposed reach codes under Implementation Program COS-S, Mitigation Measure GHG-1 would prohibit the installation of new natural gas infrastructure in new residential construction through amendments to the County's zoning codes.

Mitigation Measure GHG-1 also would apply to 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. Mitigation Measure GHG-2 would reduce GHG emissions by achieving energy savings at existing and future industrial buildings through benchmarking of energy consumption and providing recommendations for energy efficiency retrofitting within large, energy intensive facilities operating in the county.

Regarding Mitigation Measure GHG-3, the 2040 General Plan has relied on validated assumptions from SCAG and VCTC about the scale and type of growth anticipated through 2040. For example, the GHG forecasting assumes that the County's housing stock would increase from 32,446 to 33,472 units between 2020 and 2040, a 3 percent increase. Environmentally preferable design features or alternatives from a GHG reduction standpoint may be overlooked if an individual project tiers to a programmatic EIR which evaluated impacts of GHG emissions at a county-wide scale. The types of emerging technologies that could be available when projects are considered for discretionary and ministerial approval over the next two decades cannot be determined at this time. For this reason, Mitigation Measure GHG-3 specifies that the CEQA streamlining provision proposed as COS-EE in the 2040 General Plan be removed, and that the potential GHG emissions impacts of future, discretionary projects be reviewed in accordance with the most recent adopted version of the ISAGs at the time of project-level environmental review.

Mitigation Measure GHG-3 could result in additional GHG emission reductions if improved technologies, design features, or the like that are infeasible or unavailable today become available and are included in future development or required as part of future project-level reviews. To the extent this were to occur, this mitigation measure would improve progress toward meeting the 2030 and post-2030 GHG reduction targets. However, it would be speculative to determine at this time whether and how Mitigation Measure GHG-3 would affect future GHG emissions in the county.

Programs are critical for estimating the 2040 General Plan's targeted GHG reductions for 2030 and beyond, because they provide more detail on the specific steps that the County will take to implement GHG reducing policies. Many of the policies would achieve GHG reductions from future development but do not, on their own, specify the proactive measures that would be implemented to achieve GHG reductions. As a result, the policies, while supportive of future GHG reduction measures, do not contain enough specificity for their numeric contribution to the established 2040 target to be quantified. In other cases, the future GHG reduction effectiveness of implementation programs of the 2040 General Plan cannot be reliably quantified at this program level of analysis, although evidence from other local governments demonstrates that these types of programs achieve GHG reductions.

Mitigation Measure GHG-4 could result in additional GHG emission reductions by prompting the County to explore subprograms based on the recommendations of a Climate Emergency Council that support the policies and implementation programs of the 2040 General Plan. This approach would allow the County to develop programs and actions with increased specificity using the latest available research, tools, and methodologies available in the evolving field of climate action planning and GHG reduction. Mitigation Measures CTM-1, CTM-2, and CTM-3 would reduce the rate of VMT associated with existing and future development in Ventura County, which would also reduce GHG emissions associated with vehicle travel. Policies and Implementation Programs of the 2040 General Plan and mitigation measures that would reduce the rate of VMT associated with existing and future development in the county are described further in Section 4.16, "Transportation and Traffic."

Most of the GHG reduction policies and implementation programs included in the 2040 General Plan, and the mitigation measures identified above, are targeted to future development (as opposed to existing development), because these are the activities where the County has the greatest ability to enforce regulations, ordinances, and design standards. The modest amount of forecasted growth that would be accommodated by the 2040 General Plan (i.e., 4,099 new people, 1,281 housing units, 2,986 new jobs relative to 2015) means that future development accounts for a small share of forecasted GHG emissions; a large share of future forecasted GHG emissions in the county are the result of existing development. As a result, the policies and programs and mitigation measures targeting the modest amount of forecasted growth would not achieve sufficient GHG reductions to meet the 2030 target.

With the modest amount of forecast future growth in the county, substantial GHG reductions would need to be derived from measures targeting existing development, infrastructure, and associated activity levels. Most emissions that are forecast to occur in the county are from energy use in existing buildings, vehicle use and travel behavior influenced by the existing land use pattern and transportation systems, landfilled waste, and established agricultural operations. While the County encourages and promotes the reduction of or changes to these activities contributing to GHG emissions, it does not have the authority to enforce measures that may potentially infringe upon private property rights, reduce the economic competitiveness of local businesses, or inhibit the ability for residents to travel between residences, jobs, and amenities. Pursuant to Section 15093 of the State CEQA Guidelines, CEQA requires the lead agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable. These factors constrain the ability for the County to reduce GHG emissions from existing activities through additional mitigation measures.

Furthermore, as described in the regulatory setting, the SAFE Rule proposed by the NHTSA and EPA would limit CARB's long-term ability for enforce State-specific GHG emissions and zero emission vehicle standards for vehicles sold in California, including within the county. As described in the methodology subsection, these regulations contribute to legislatively adjusted GHG reductions for the 2040 General Plan and emissions factors used to convert VMT into CO<sub>2e</sub> emissions for GHG inventories and forecasting. If California is unable to implement its Advanced Clean Car Standards and zero emission vehicle program it would impair the ability for the County to achieve GHG reductions consistent with the State's 2030 goal, and it is not feasible for the County to establish GHG emissions and zero emission vehicle standards for vehicles sold in its jurisdiction. Therefore, for all the foregoing reasons, this impact would be **significant and unavoidable**.

#### **Impact 4.8-2: Conflict with an Applicable Plan, Policy, or Regulation for the Purpose of Reducing the Emissions of GHGs**

As noted in the 2017 Scoping Plan, the long-term goal of achieving a GHG emissions reduction of 80 percent below 1990 levels by 2050, represents the State's commitment to achieving its "fair share" of GHG emissions reductions required under the Paris Agreement, which identified scientifically-based global emissions levels required to put the world on track to limit global warming to below 2°C, thereby avoiding the most catastrophic and dangerous impacts of global climate change (CARB 2017:99).

Additionally, the 2030 target codified into State law per SB 32 was established consistent with the long-term trajectory of emissions reductions required to achieve the 2050 goal. The Statewide GHG reduction goals for 2050 have not been codified, and a plan for attaining the 2050 reduction target has not been developed by CARB or the State.

Implementation of the 2040 General Plan, in combination with State laws, regulations, and programs, would result in a downward GHG emissions reductions trajectory for the county that supports the Statewide reduction target for 2030 identified in the 2017 Scoping Plan and the State's post-2030 reduction goals, including the Executive Order S-3-05 goal of reducing Statewide emissions to 80 percent below 1990 levels by 2050. The 2017 Scoping Plan identifies the State's approach for achieving the 2030 target, which consists of policies addressing renewable electricity, energy efficiency, low carbon fuels, zero and low emission vehicles, cleaner transit systems, VMT reduction, short-lived climate pollutants, sustainable goods movement, and a Cap-and-Trade Program. The largest proportion of reductions achieved to attain the 2030 target would come from the Cap-and-Trade Program, Short-Lived Climate Pollutants, Mobile Sources and Freight, Energy Efficiency, low carbon fuels (Biofuels) and renewable electricity. Most of these policies require State-level action, while local governments such as the County also have jurisdiction and influence over the built environment and its GHG emissions. Examples include renewable energy and energy efficiency, land use decisions, and local transportation infrastructure and policy. The State has not developed a plan or approach identifying the policies needed to meet the State's post-2030 reduction targets. While it does not describe a detailed approach to meeting the State's 2050 reduction target, the 2017 Scoping Plan does make clear that coordinated actions and significant, fundamental changes involving all levels of government, private industry, and residents are required for the State to achieve its GHG reduction goals.

As described in Impact 4.8-1, the 2040 General Plan includes several implementation programs with a quantifiable effect on future GHG emissions, and a substantial number of additional programs and policies in every GHG emission sector that would result in further GHG emissions, although their effect on GHG emissions cannot be quantified at this program level of analysis. The 2040 General Plan policies and programs complement the main area of local government influence over GHG emissions, including renewable energy and energy efficiency, land use decisions, and local transportation infrastructure and policy. The available information that can be quantified demonstrates that future emissions in the county would be on a downward trajectory through 2050. Qualitative evidence shows that the many policies and programs that cannot be quantified at this time would lead to further GHG reductions and additional progress toward State GHG reduction targets. However, for these reasons and those described in Impact 4.8-1, 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 2040 General Plan includes Policy COS-10.3 that requires the County to achieve GHG emissions reductions by 2040 and 2050 that are consistent with State targets. Additionally, as stated in Implementation Program COS-AA, the County would conduct an update of its community-wide GHG emissions inventory every 5 years to assess progress to date in meeting the adopted targets, and periodically update the CAP through Implementation Program COS-AA to address post-2030 emissions reduction targets and associated updates to the Scoping Plan that could be approved by the State, in light of State's long-term 2050

emission reduction goal established by EO S-3-05 and guidance included in the 2017 Scoping Plan. Implementation Programs COS-Y, COS-Z, COS-AA, COS-BB, COS-CC, COS-DD and LU-P have also been included to regularly track progress, solicit input, and make updates to the climate actions included in the 2040 General Plan, consistent with the requirements of Section 15183.5 of the State CEQA Guidelines. Table 4.8-8 describes how each of these programs supports the ongoing administration of the CAP. During review of the climate policies and programs contained in the 2040 General Plan, new State or federal legislation can be evaluated to determine if GHG reductions are occurring from these actions within the county. As part of future monitoring activities, the County may also consider new technologies that support GHG reduction or CO<sub>2</sub> sequestration and determine the potential application of these within the county. Nevertheless, because the 2040 General Plan would likely not, on its own, result in a sufficient level of GHG reductions for the County to meet the longer-term goal for 2050 expressed in EO S-3-05, or the 2030 target established by SB 32, this impact would be **potentially significant**.

**Table 4.8-8 Programs Supporting Implementation and Monitoring of GHG Reduction Strategy**

<b>Program</b>	<b>How Program Supports Implementation and Monitoring</b>
COS-X	Implements overall GHG reduction strategy including all programs and policies included in the 2040 General Plan.
COS-Y	Provides opportunity to fine tune GHG reduction policies based upon performance.
COS-Z	Allows public feedback on the strategies used to reduce GHG emissions. Communication on the strategies needed to achieve GHG reduction may support increased public participation on sustainability programs.
COS-AA	Updates to GHG emissions inventory to track GHG reduction performance.
COS-BB	Allows adjustments to be made to plan based on actual performance.
COS-CC	Advisory committee providing input on plan performance and new program development.
COS-DD	Staffing and funding for the implementation of near-term policies and programs to stay on track with meeting 2030 goals.
LU-P	Supports ongoing CAP implementation and updates in conformance with CEQA Guidelines Section 15183.5.

## Mitigation Measures

### **Mitigation Measure GHG-1: New Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development**

### **Mitigation Measure GHG-2: New Implementation Program HAZ-X: Building Energy Saving Ordinance for Industrial Buildings**

### **Mitigation Measure GHG-3: Do Not Include Implementation Program COS-EE in the 2040 General Plan**

### **Mitigation Measure GHG-4: New Implementation Program HAZ-X: Greenhouse Gas Reduction Policy Enhancement Program**

### **Mitigation Measure CTM-1: New Implementation Program CTM-X: Interim VMT CEQA Assessment Criteria**

### **Mitigation Measure CTM-2: Revised Implementation Program CTM-B: Initial Study Assessment Guidelines**

### **Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program**

No additional feasible mitigation has been identified at this time beyond the mitigation measures identified above and the policies and implementation programs of the 2040 General Plan. Under the 2040 General Plan future GHG emissions in the county would be on a downward trajectory compatible with State plans, policies, and regulations that would also result in GHG reductions in the county. However, some reductions in the transportation sector cannot be assured due to uncertainties in State regulations affecting GHG emissions from the county's transportation sector, which represents the largest share of baseline and forecast GHG emissions (as shown in Tables 4.8-1 and 4.8-2). As described in the regulatory setting, the SAFE Rule proposed by the NHTSA and EPA would limit CARB's long-term ability to enforce State-specific GHG emissions and zero emission vehicle standards for vehicles sold in California, including within the county. As of December 2019, CARB has published guidance on adjusting emissions factors to account for the SAFE Rule Part One, but this guidance focuses specifically on criteria air pollutants and does not include GHGs such as carbon dioxide, methane and nitrous oxides. The repeal of CARB's waiver for enforcing vehicle emission standards will likely impair the ability for Ventura County to achieve GHG reductions consistent with the State's 2030 goal (with similar consequences for other local governments in California). However, the precise effects of this regulatory change on GHG emissions cannot be quantified at this time due to uncertainties about the implications of the policy at the state and regional level.

Additionally, longer term GHG reduction goals beyond 2030 established by State executive orders would necessitate additional or more stringent GHG reduction policies and programs beyond what is presented in the 2040 General Plan. However, due to the County's minimal growth, most of the forecast GHG emissions in 2030 and beyond are caused or influenced by from energy use in existing buildings, vehicle use and travel behavior on existing transportation systems, landfilled waste, and agricultural uses where the County has limited authority to enforce stringent actions resulting in GHG reductions beyond what have been already been included in the 2040 General Plan and the mitigation measures identified in Impact 4.8-2. Per Section 15093 of the State CEQA Guidelines, CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. Under this guidance, decision-making agencies may consider weighing the adverse and unavoidable impacts resulting from global GHG emissions, against mitigation measures that may reduce the economic productivity of established businesses, and/or impose limitations on technologies available for agricultural production, transportation, and construction. Although the 2040 General Plan would not conflict with State GHG reduction targets and recommended local actions established in the 2017 Scoping Plan, and the 2040 General Plan would set future GHG emissions on a downward trajectory consistent with State reduction targets, it cannot be determined at this program level of analysis that future emissions within the county meet State 2030 and post-2030 targets for GHG reduction. Therefore, this impact would be **significant and unavoidable**.