



June 11, 2019

Ventura County Planning Commission
County Government Center
800 S. Victoria Ave.
Ventura, CA 93009

RE: GPU Policy and Program Recommendations for the Conservation and Open Space Element and Climate Action Plan

Dear Planning Commissioners,

The 350 Ventura County Climate Hub herein submits comments about climate-related policies and programs in the Conservation and Open Space Element.

Policy and program recommendations for the last three Elements--Agriculture, Water Resources and Economic Vitality will be sent for your consideration on June 20. A preliminary outline of those policies can be found at the end of this document followed by more Glossary additions.

Our highest priority demand is a **Carbon Tax on Oil and Gas Extraction, Flaring and Leakage**. Oil and methane have climate and public health impacts that must be treated as serious threats. Methane has other public dangers including the possibility of explosions and fires in the event of an earthquake or other incidents. In addition to methane dangers, there are immediate public health threats about hydrogen sulfide and BTEX (benzene, toluene, ethyl benzene, and xylene) that are carcinogens and neurotoxins.

This submission contains:

- 19 policies related to emissions reduction and fossil fuel pollution prevention including our carbon tax policy.
- 37 policies related to the decarbonization and renewable energy aspects of Conservation (some similar to the VC2040 draft but reworded to include necessary accountability).
- 22 policies in the Open Space category again replacing those draft policies beginning with the words "encourage" or "shall work with" because we are asking the County to take these actions related to Climate Change and Open Space.
- 10 new Programs for this Element.

Sincerely,

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Ron Whitehurst, Coordinating Team 350 Ventura County Climate Hub

Kitty Merrill, Coordinating Team, 350 Ventura County Climate Hub

Kathleen Nolan, Planning Commissioner, City of Ojai and Resident, Unincorporated Ventura County

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Emissions Reductions & Fossil Fuel Pollution Prevention Policies & Programs for the Ventura County General Plan 2040 Update

According to the world's leading scientists, we have until 2030 – only 11 years – to radically cut the emissions that have become habitual in our carbon-based economy. The world must cut emissions by 45% by 2030 and reach net-zero emissions by 2050 to stop warming at 1.5°C. If we don't, conditions will worsen for hundreds of millions of people. The Paris Agreement, adopted in December 2015, was a global commitment to avoid dangerous climate change and limit future temperature increase to 1.5 to 2°C above pre-industrial levels. Ventura County committed to the Paris Agreement requiring greenhouse gas emissions (GHGs) reductions to 50% below 1990 levels by 2025; 73% below 1990 levels by 2035; and becoming carbon neutral by 2050.

California state law SB 32 requires 40% below 1990 levels by 2030 and the mandate under Governor's Executive Order B-18-55 is "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing greenhouse gas emissions." ¹

This must also be Ventura County's goal. Now is the time.

Jurisdictions including the City of Los Angeles are adopting the Green New Deal Pathway to cut an additional 30% in GHG emissions above and beyond their 2015 baseline to ensure that they stay within a net zero carbon budget between now and 2045.

The proposed GHG reductions in the VC2040 Draft General Plan Update of 41 percent below 2015 levels by 2030, 61 percent by 2040, and 80 percent by 2050 are inappropriate in the context of our community doing its part to respond to the climate chaos happening faster than scientists have predicted. Remember, Ventura County residents gave the county a mandate (General Plan survey results) to be proactive in responding to climate change. In addition to reducing GHG emissions, the goals and targets we demand will improve air quality, public health and quality of life for our residents.

We want a Climate Action Plan that helps us collectively do all we can to mitigate the impacts of climate change and help our communities and young people adapt to an increasingly challenging future.

¹ <https://www.epa.gov/ground-level-ozone-pollution/2015-revision-2008-ozone-national-ambient-air-quality-standards-naaqs>; <http://www.vcapcd.org/NNAAQSGLO.htm>

The County shall:

1. **Reduce Greenhouse Gas Emissions** 55% by 2025; 65% by 2035; reach carbon neutral by 2045, and achieve and maintain net negative emissions thereafter.
2. **Prioritize development of renewable energy** over oil and natural gas extraction industries.
 - a. **Program: Implement a Carbon Tax on Oil and Gas Extraction, Flaring and Leakage** to fund climate programs for mitigation, equity, and adaptation prioritized by the Climate Emergency Council advising the Climate Emergency Mobilization Director; a minimum of 15% of monthly revenues will be reserved cumulatively for disaster relief programs. Carbon tax to be levied at three rates, 1) on extracted oil and methane that is sold for a useful purpose, 2) on flared oil and methane, and 3) on leaked methane. Revenues will fund Climate Mitigation, Climate Equity, and Climate Adaptation activities and programs.
3. **Reduce Oil Production** by 40% below 2013 levels by 2025 and lead interagency cooperation to develop a sunset strategy for oil and gas production operations countywide.
 - a. **Program: Create an Interagency Task Force for Oil Well and Facilities Compliance** reporting to the Climate Emergency Mobilization Director to carry out a program including annual inspections, update of County processes for inspections and permitting of oil and gas extraction facilities, support for leak detection and repair initiatives, exploring new emissions capture technology, and improving tracking for flaring emissions with a transparent database of air quality impacts.
 - i. By January 2022 this Task Force shall assure:
 1. Elimination of backlog of leaks within the natural gas supply chain.
 2. Updating of all pipeline franchise agreements to require leak detection, abatement best practices, and strong environmental and health and safety protections.
 3. Development of an audit of methane hotspot sensors installed in the County.
 4. Implementation of a continuous emissions auditing and tracking program for oil and gas wells throughout the County using best available software.
 5. Evaluating and prioritizing risks and sealing orphan and abandoned oil wells.
 6. Ensuring that idle wells are properly identified, remediated and sealed.

4. Evaluate Waste to Energy and Conversion Technology pilot projects to replace flares at oil drill sites; e.g. Micro Turbines.
5. Support Implementation of Heavy-Duty Industry Emissions Reduction Plans
6. Reach the U.S. EPA 70 ppb Ozone Attainment Standard [1]by 2025 and meet all future compliance dates.
7. Reduce Industrial Emissions by 38% by 2035; and 82% by 2050.
8. Reduce Fugitive and Vented Methane Emissions by 54% by 2035; and 80% by 2050 based on improved monitoring.
9. Improve Tracking for Emissions from Imported Oil and Gas.
10. Monitor and Track Imports and Exports of Crude Oil and Gasoline.
11. Improve Tracking of Consumption Emissions Associated with Imported Oil
12. Quantify and include in our inventory Out-of-State GHG Emissions from Methane Leakage During the Production, Processing, and Transportation of Imported Natural Gas
13. Deploy Community Air Quality and GHG Emissions Monitoring Networks.
14. Identify and Analyze Toxic Air Contaminants emitted from oil and gas production facilities.
15. Enhance Health and Safety Protection at oil and gas production facilities.
16. Require Minimum 2500-Foot No Drill Buffer Zone between oil and gas production facilities and residences for health and safety.
17. Train County Sanitation Inspectors to Identify Air Quality Violations and notify local authorities.
18. Create an Air Quality Mitigation Working Group to prioritize and execute mitigation steps in highly impacted neighborhoods.
19. Engage Oil Industry Stakeholders in a 100% Renewable Energy Study to identify renewable generation opportunities compatible with operational needs.

CLIMATE EMERGENCY, DECARBONIZATION AND ENERGY RESILIENCE POLICIES & PROGRAMS

The urgency for comprehensive action involving increasing numbers of residents requires consultation by a Climate Emergency Council and management by a Climate Emergency Mobilization Director. The statement by the General Plan Update consultant that community microgrids are covered under “ Smart Grid Technology” demonstrates a lack of understanding. Ventura County is at the end of the grid and in a wildfire prone area, making us vulnerable to loss of power during critical times when electricity is needed to operate water systems to fight fires. The county would benefit greatly from islandable energy resources with storage. SoCal Edison is responsible for multiple barriers to the development of these resources. In addition to supporting developers and property owners to form partnerships and identify financing, the county must advocate effectively for the regulatory reforms we require. Some of the following policies request that advocacy.

The County shall:

1. **Declare a Climate Emergency** and prioritize climate action programs and conversion to 100% renewable energy.

Programs:

- a. **Create a Climate Emergency Mobilization Council** to engage impacted communities in prioritizing and implementing climate actions. The Council will also advise on how to invest the county’s carbon tax revenues. The council will be composed nine members from among local scientists from relevant disciplines, economic stakeholders and representatives from impacted communities to prioritize climate challenges and programs and advise the Climate Emergency Mobilization Director how to invest the county’s carbon tax revenues where they will be most effective
- b. **Appoint a Climate Emergency Mobilization Director** that oversees all county departments’ responsibility for climate action and directs expansive community education and outreach.
- c. **Create a 100% Renewable Energy Advisory Group** to conduct studies and partner on public outreach reporting to the Climate Emergency Mobilization Director. This Advisory Group will work with all appropriate county agencies to assist the county in adhering to all climate action policies related to renewable energy promotion and conversion.
- d. **Educate and Train 50,000 Ventura County Residents** about opportunities to install renewable energy generation and storage by 2025.

- e. **Create a Solarize Program Targeting Renters and Affordable Housing Customers** for energy efficiency rebate opportunities, expand access to solar savings for solar rooftops and shared solar programs, identify and communicate energy conservation potential for multi-family properties, and launch a New Virtual Net Energy Metering Pilot program for multi-family households to go solar and implement a feasibility study to scale up program
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- 2. **Use 100% renewable electricity in all County facilities starting in 2020.**
 - 3. **Reduce County Energy Use** by 18% by 2025; 35% by 2035; and 44% by 2050.
 - 4. **Provide Energy Benchmarking for Affordable Housing and Non-profits** at a discount using trainees from local colleges.
 - 5. **Collaborate to Improve Energy Efficiency Rebates** by analyzing energy data.
 - 6. **Lead in Raising \$20 million for Energy Efficiency Programs** for renters and affordable housing customers and target outreach for energy efficiency rebate opportunities to renters and affordable housing customers.
 - 7. **Reduce Energy Use for All Building Types** per sq. ft. 22% by 2025; 34% by 2035; and 44% by 2050.
 - 8. **Use Energy Efficiency to Deliver 15% of Projected Needs** for electricity in the county by 2020; and 30% by 2030.
 - 9. **Prioritize energy and water efficiency building standards** and work to retrofit existing buildings.
 - a. **Program: Create an Existing Buildings Energy & Water Efficiency (EBEWE)** program and a resource center to support implementation of EBEWE and achieve and maintain +85% compliance. [Source: City of LA]
 - 10. **Decarbonize County Buildings** by developing a county building electrification plan and disconnecting from gas service County-owned facilities.

11. **Decarbonize All Building Types** in the county by developing a county electrification plan that sets goals for GHG emissions through renewable energy by programs for local solar, energy storage capacity and demand response (DR) that disconnects all buildings from gas service by 2050.
 - a. **Program: Create an Air Quality Mitigation Working Group** to prioritize and execute mitigation steps in highly impacted neighborhoods
12. **Require All-Electric Construction and Renovation** for newly constructed or renovated buildings, meaning that electricity is the only permanent source of energy for water-heating, mechanical and heating, ventilation and air conditioning (HVAC) (i.e., space-heating and space cooling), cooking, and clothes-drying and there is no gas meter connection.
13. **Assist School Districts to Electrify** by leveraging government funds (such as Proposition 39) to finance electrification projects at school facilities.
14. **Collaborate to Promote Financing Programs** for building electrification with regional organizations and the local electric service providers.
15. **Collaborate to Promote Heat Pumps and Electrification** with State-sponsored financing offerings and pilots and Property Assessed Clean Energy (“PACE”) programs.
16. **Prioritize Solar and Microgrid Backup Power Projects** at critical County-owned facilities including piloting dispatchable and customer-side storage.
17. **Map and Facilitate Development of Microgrid Resiliency Projects** starting in the county’s tier 3 fire threat areas.
18. **Accelerate Distributed Generation and Microgrid Project Development** by creating a DER and Microgrid Planning Map and seeking opportunities for third-party clean energy service providers to leverage private property.
19. **Facilitate Collaboration to Increase County-wide Energy Storage to 600 MW by 2025** cumulatively.
20. **Collaborate to Build Microgrid Backup Power Projects** immediately at critical County-owned facilities.
21. **Advocate for Streamlined Interconnection** processes for energy storage and microgrid projects.

22. **Engage Cities and Community Neighborhood Councils** to identify priorities and help assess community level impact of climate programs.
23. **Engage Building Owners and Tenants** on benefits of building upgrades.
24. **Create Incentives and Awareness of Incentives for Electrification** in energy efficiency and solar incentive programs and smart building energy management systems.
25. **Engage Other Cities including in Other Countries** on smart building policies.
26. **Expand and improve access to financing.**
27. **Assess Consumption from Energy-Water Nexus** and report to the community.
28. **Advocate for a Resiliency Feed-in Tariff Program** to include storage and community microgrids to CPUC, the Legislature, and Clean Power Alliance
29. **Create a Standard Plan for Carport Solar.**
30. **Require all Newly Built Parking Structures to Have Solar.**
31. **Streamline Permitting** for Solar and Energy Storage Projects and community microgrids.
32. **Advocate for Streamlined Residential Solar PV and Solar + Storage Interconnection** with wait times not to exceed two weeks.
33. **Advocate Expansion of Demand Response (DR) Technology** including deployment of automated commercial DR and launch of residential thermostat DR program and increase cumulative MW of DR to 20 MW.
34. **Investigate Bidirectional Smart-grid Technologies** to prepare for large-scale adoption of electric vehicles (EVs).
35. **Study and Approve Safe Communication Network (not 5G)** to enable use of smart meters.
36. **Provide Environmental Assistance to Prepare Brownfield Projects** for redevelopment focusing on disadvantaged communities.

37. **Leverage New Development Linkage Fees to Build Affordable Housing** with equitable geographic distribution to address gentrification.

[Source: https://planning.lacity.org/ordinances/docs/ahlf/LA_Linkage_Fee_Final_Report_9-21-16.pdf]

OPEN SPACE POLICIES & PROGRAMS

Plans for the management of natural lands, open space, parks and landscaping are of equal importance to conservation, pollution prevention and decarbonization measures in addressing climate mitigation, climate equity and climate adaptation. The following are our recommendations.

The County shall:

1. **Reduce Residential Neighborhood/Open Space Temperature Differential** by at least 1.7 degrees by 2025; and 3 degrees by 2035.
2. **Increase Tree Canopy by at Least 50% by 2028 and Support the Planting of 5,000 Trees Annually** by identifying low canopy corridors, leverage state and federal funding to plant, preserve, and maintain trees on residential and public properties in those areas and countywide, and expand tree maintenance green jobs training programs
 - a. **Program: Ecosystem Restoration and Adopt-a-Canopy Program** partnering with local government agencies and NGOs that supports grant applications utilizing state funds to expand tree-planting in parks and open space, public and private, including ecological system restoration camps and support for county trees
3. **Increase Use of Joint-Use Park Spaces and Bike Corridors** through agreements for programming and activities, including additional cooling features such as innovative shade design, water features, and cooling centers to better meet the needs of elderly and persons with disabilities.
4. **Maximize carbon sequestration** throughout the county.
 - a. **PROGRAM: Create a Carbon Sequestration Technical Advisory Committee** reporting to the Climate Emergency Mobilization Director. Committee objectives are:

- i. At least double the pace and scale of forested land restored and managed
- ii. update ordinances to preserve, maintain, and grow protected tree species, and public and private trees
- iii. review and revise public right-of-way standards to ensure optimum street tree canopy,
- iv. at least triple the pace of reforestation of oak savannas and riparian areas,
- v. at least double the rate of wetland and seagrass restoration, and
- vi. increase by at least five-fold the number of acres in soil conservation practices in landscapes and open space.
- vii. Protect and preserve chaparral habitat.

Tasks of this Committee will include:

- Complete a Ventura County Tree Inventory by 2021.
- Build a countywide Implementation Plan for Natural and Working Lands by 2023, and an Urban Forest Management Plan by 2025.

5. **Pilot Opportunities to Expand Flexibility for Research and Development in Tree Procurement** specifications, including with contract-grow nurseries.
6. **Encourage Tree-Trimming Businesses to Prioritize Multi-Benefits** including tree health, management of invasive pests, public safety, shade and appropriate wood chip mulch distribution for weed abatement through incentives.
7. **Require Use of Only Electrically-Powered Outdoor Maintenance Equipment** instead of gas- and diesel-power for maintenance of county properties, parks, medians, and bike corridors to qualify for “green zone” certification by the American Green Zone Alliance (AGZA).
8. **Help Create Access to the Ventura River by 3 Active Transportation Bridges** as described in the Ventura River Watershed Management Plan by facilitating collaboration between the City of Ventura, CalTrans, the Ventura Land Trust, and NGOs.
9. **Plan and Implement Maximum Ecosystem Restoration of the Ojai Hike and Bike Trail from Foster Park North** including vegetation and trees on the full 40-foot-wide of easement wherever possible; complete at least 1 additional mile of bike paths and trails by 2021; and 10 by 2025.

10. **Support and Expand Compatible Santa Clara River Recreational Opportunities** including bike path and trails supportive infrastructure.
11. **Expand Marketing Around Cool Roof Incentives** program to accelerate retrofits.
12. **Pilot 2 Cool Neighborhoods** in vulnerable communities by 2021; and 4 by 2025 to include a mix of cool roofs, cool pavements, and urban greening that may include innovative shade designs, water features, and cooling centers at parks and air temperature monitoring in air quality sensor deployments.
13. **Update “Cool Surface” Regulations** to require that at least 50% of all non-roof (e.g., hardscape) surfaces around new buildings meet certain criteria to reduce urban heat island effect, to promote cooling strategies and “softening” of hardscape in alleys and parking lots, and to study cool streets to determine maximum potential of cooling strategies for reducing urban heat impacts.
14. **Install Cool Pavement Material on 250 Lane Miles** of county streets, prioritizing neighborhoods with the most severe heat island effect.
15. **Achieve and Maintain ‘No-Net Loss’ of Native Biodiversity by 2035** by assuring a baseline biodiversity index and monitoring program, including for Ventura County’s first wildlife corridor, and build up the county’s biodiversity program to improve internal practices.
16. **Update Watershed Protection Policies for Enhanced Stream Protection and Storm water Infiltration** and collaborate with California Fish and Wildlife to pilot the introduction of beavers into the Sespe watershed to help restore small water cycles.
17. **Update a Countywide Integrated Pest Management Plan** to prioritize reducing pesticide and rodenticide use, including the use of non-toxic pest management options wherever possible and develop guidance and training for county maintenance staff on natural area and non-toxic pest management.
18. **Preserve and Expand Connectivity and Access to Natural Habitats** in conjunction with the Master Bicycle Network Plan and Bicycle Tourism Program (to be described in the Economic Vitality Element) including protection and restoration of sensitive habitats and the increase in the number of native and pollinator-friendly gardens and natural areas in bicycle corridors and public spaces.

19. **Help Get One or More of Ventura County's Cities into the Top Ten in the City Nature Challenge** by helping host an annual bio blitz using community science apps such as iNaturalist or eBird, increasing observations of Ventura County's biodiversity indicator species list, and developing strategies in partnership with School Districts and the Community College District to increase community science app users, especially in data-poor areas.
 20. **Ensure an Increasing Proportion of Ventura County Residents Live Within 1/2 Mile of a Park or Open Space** by at least 65% by 2025; 75% by 2035; and 100% by 2050.
 21. **Add Minimum 3 Parks by 2021; and 10 Parks by 2025** by partnering with government agencies and NGOs to expand county parks and free access open space including a new river park in each of the 3 watersheds while leveraging state funds to support groundwater recharge, storm water management, and green infrastructure.
 22. **Assess and Track Park Acreage per 1000 Residents and Adopt Park Equity Investment Criteria** to help prioritize park placement and establish 4 parks or joint-use parks in underserved communities by 2026. Data Source: Trust for Public Land ParkScore® Index
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