



June 12, 2019

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

RE: GPU Policy and Program Recommendations for the Public Facilities, Services and Infrastructure Element Relating to Climate Change

Dear Planning Commissioners,

The 350 Ventura County Climate Hub finds many good new policies and programs in the Public Facilities, Services and Infrastructure Element and space for many more needed policies related to climate adaptation and mitigation!

Our two biggest issues in the Public Facilities, Services and Infrastructure Element are community microgrids and sustainable performance-based design standards. Each represents a new path to a more resilient future as we prepare for extreme climate impacts. We urge the county to be in a learning mode. We need policies of advocacy for safer, less vulnerable infrastructure. We need leadership that actively promotes public awareness about preferable options for avoiding hazards compared to long-distance electrical transmission and traditional, often flammable and toxic building construction practices and requirements that can cause and exacerbate disasters.

1. Community Microgrids

The County shall collaborate with renewable energy developers, Clean Power Alliance, and load serving entities to develop solar generation plus energy storage at critical facilities and community microgrids for resilience during power outages with a priority on designated disadvantaged communities.

RATIONALE: Communities in wildfire prone areas and near or at the end of transmission lines can have a less vulnerable, more resilient and more cost-effective energy supply when community microgrids are developed with local renewable Distributed Energy Resources (DER), Demand Response (DR), energy storage and appropriate switches and software. Fewer and shorter transmission lines are needed with their risks of starting fires and their exposure to hazards.

2. Sustainable Performance-Based Design

The County shall facilitate innovation, testing, technical support and public education about state-of-the-art performance-based standards rather than prescriptive codes that enable best project designs and practices for water conservation, especially during the

fighting of fires (such as external misters instead of internal sprinklers), and sustainable, fire resistant materials and construction.

NEW PROGRAM

Develop Collaborative Program for Sustainable Performance-Based Design

The County shall establish a collaborative decision-making structure to support pilot housing and land use projects using performance versus prescriptive standards to demonstrate sustainability in terms of environmental and community impacts. The Collaborative structure will include project users, designers, and permittees in an ongoing process to measure and report project results to the community.

RATIONALE FOR ASSURING A PROCESS FOR PERFORMANCE-BASED DESIGN STANDARDS TO ACHIEVE INCREASED RESILIENCE AND SUSTAINABILITY

Fire protection and prevention policy must go beyond what is covered in Building Codes. PFS-12.4 puts a value on “Consistent Fire Protection Standards” whereas consistency is not a high value under the circumstances of norms being shattered annually by climate extremes. HAZ 1.1 assumes that the county and state are aware of the best designs to enhance fire protection and water conservation during firefighting and we challenge that assumption.

The county’s consultant dismissed the June 3 recommendations by Art Ludwig of Oasis Design that we feel reflects a misunderstanding about the urgent need for a process outside of the normal building code standards for performance-based rather than prescriptive standards to accelerate adaptation to extreme weather events. The need for community education is also paramount, so that people can take advantage of these low-cost sustainable approaches that are more likely to save more lives and protect people’s most precious possessions than by following current building standards. People who are rebuilding now from the Thomas Fire are deprived of this knowledge about resilient designs, whereas they could have protected themselves from a repeat of heartbreaking loss.

Below are additional compelling recommendations for the Public Facilities, Services and Infrastructure Element that help communities better prepare for the impacts of climate change and contribute less to atmospheric pollution.

Sincerely,

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Public Facilities, Services and Infrastructure Policies & Programs

Goal 2: To be a regional leader in energy efficiency.

NEW POLICIES:

The County shall:

1. **Reduce Number and Distance of Single-Occupancy Vehicle Work Trips** by establishing a demonstration Dividend Account Parking program and exploring other options, such as a ride-share app, telecommuting, and variable work schedules to reduce peak period VMT.

ADD TO PROGRAM F:

Parking pricing incentives, in particular a pilot Dividend Account System, among the program actions under Trip Reduction for County Staff.

Convert all County Fleet Vehicles to Zero Emission where technically feasible by 2028 by a “zero emissions first” procurement policy for county fleets. 100% of new light duty purchases shall be electric.

Deploy Additional Charging Stations by installing 80 EV chargers at County buildings, parks and libraries by 2021 ensuring that county deployed EV chargers are distributed equitably around the county, with a focus on disadvantaged neighborhoods

2. **Lead Locally and Nationally on EV Adoption** by joining the Climate Mayors EV Purchasing Collaborative, releasing EV RFI for electric equipment, commissioning a study on converting County pool vehicles to ride share and other alternatives, and revising County employee commuter benefits to encourage mode shift and carpooling

GOAL 4: *To ensure the adequate provision of individual and public wastewater collection, treatment, reclamation, and disposal operations and facilities to meet the county's current and future needs in a manner that will protect the natural environment as well as public health, safety, and welfare.*

AMENDED POLICY PFS 4.5:

The County shall Encourage System Upgrades for Reclaiming Wastewater for Potable Reuse for landscaping, irrigation, hydroponic agriculture, groundwater recharge, and for potable reuse in the public water system also called “toilet to tap”.

GOAL 5: *To maximize recycling, reuse, and composting of solid waste and ensure the safe handling and disposal of the remaining solid and hazardous waste*

The County shall:

3. **Increase Landfill Diversion Rate** to 90% by 2025; 95% by 2035; and 100% by 2050
4. **Reduce Solid Waste Generation per Capita by at Least 15% by 2030**, including phasing out single-use plastics by 2028
5. **Eliminate Organic Waste Going to Landfill by 2028** (which refers to food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper waste that is mixed in with food waste) by requiring Countywide residential food scraps collection, food preservation, sustainable consumption transition, and composting.

Program: Develop a Master Composting Program to guide schools, churches, NGOs, businesses and homeowners how to compost organic waste.

Develop a Countywide Composting Master Plan to include

- assessing the county’s anaerobic digestion capacity,
- expanding community and regional composting infrastructure,
- establishing food scraps drop-off locations at all County farmers markets,
- partnering with local organizations to ensure food scraps are composted locally first, recovering and distributing at least 30% of discarded edible food, and

- ensuring all food businesses have food rescue options available through their waste hauling service, standardizing food donation options for businesses by 2021, and that
 - by 2025 the Master Plan shall aim at identifying and engaging major point sources of food waste throughout the County on food recovery programs and organics recycling
6. **Assure that a Waste Characterization and Diversion Study is Done Every 4 Years** including assessment of best practices from other cities and integration of relevant lessons learned into policy with special attention to refrigeration equipment and compliance with recycling of refrigerant gases.
 7. **Lead on Zero Waste** and achieve a zero waste in Ventura County by 2025.
 8. **Adopt and Implement a Sustainable Technology Policy** across all County departments.
 9. **Increase Proportion of Waste Products and Recyclables Reused and/or Repurposed** productively within Ventura County to at least 25% by 2025; and 50% by 2035

Program: Conduct a Waste Characterization Study by 2021 and Assessment of Potential Reusable Materials Exchange across the County's various industries, pilot an industrial materials exchange program, and explore incentives for recycled-content product manufacturers to increase the proportion of waste products and recyclables productively reused and/or repurposed within Ventura County to at least 25% by 2025; and 50% by 2035

10. **Modernize the County's Environmentally Preferable Purchasing Policy for Waste Reduction Strategies** to include the following:
 - assessing best practices from other cities around product packaging, vendor take-back, and recycled content requirements,
 - establishing extended producer responsibility (EPR) policies,
 - leading the cities to engage in advocacy for EPR
 - developing EPR guidelines to encourage retailers and manufacturers to recycle goods, take back materials, and/or reduce packaging
 - working with electric vehicle OEMs, battery storage companies, and cleantech industry to identify new markets for used EV batteries and ensure proper recycling at end of life, developing a resource recovery hub pilot, and
 - supporting startup companies utilizing secondary material

11. **Develop Systems and Infrastructure to Improve Recycling Rates** of specialty waste streams, particularly e-waste
12. **Ensure all County Facilities are Equipped with Appropriate Recycling** including recycling for machining material and organics collection, by 2021; and proprietary facilities by 2024
13. **Update County Procurement and Contracting Requirements** to include purchase of new or refurbished equipment with less packaging through an Environmentally Preferred Products Purchasing Program and specifications on surplus food recovery, styrofoam, and single-use plastic
14. **Design and Implement a Zero Waste Policy for Meetings and Events** sponsored or permitted by the County including the development of Vendor Guidelines, emphasizing waste minimization and surplus edible food rescue
15. **Advocate Legislation or Adopt an Ordinance that Take-Out Foodware be made with Compostable Material** that must be compostable in solid waste processing facilities within 60 days
16. **Engage with Food Service Providers to Understand Barriers** to implementation of compostable take-out foodware.
17. **Update the Solid Waste Integrated Resources Plan** including how to diversify recycling markets, to analyze diversion strategies for other organic waste including food soiled paper, carpets, palm fronds, organic textiles, etc.
18. **Reduce Solid Waste Generation per Capita by at Least 15% by 2030** including phasing out single-use plastics including but not limited to plastic straws, plastic utensils, plastic take-out containers, and expanded polystyrene
19. **Ban Expanded Polystyrene Countywide** which includes but is not limited to foodware, packaging materials, and coolers and engage with key stakeholders, including food service providers, on alternatives to expanded polystyrene products
20. **Encourage an Increase in Construction and Demolition (C&D) Waste Recycling Requirements to at Least 80%**
21. **Participate in the Exploration of Additional Waste Recycling Strategies** including a pilot for a sector-specific recycling program, such as the use of 100%

recycled aggregate, options for addressing non-recyclable plastics, including secondary markets,

22. Pave all County Streets Using 50% Recycled Asphalt through interagency cooperation.

23. Cut Illegal Dumping by One-Third

24. Expand the Bulky Item Pick-Up Program

25. Launch an Educational Awareness Campaign on Climate Impacts of Refrigeration Equipment to prevent release of potent Short-Lived Climate Pollutants, including awareness about new generation refrigeration and air conditioning equipment and old types of equipment scheduled to be prohibited from sale, what to do with old equipment or equipment that may be leaking refrigerant so that polluting refrigerant can be captured by technicians and recycled

Program: Launch a Waste Reduction Educational Awareness Campaign by the following activities:

- Compile and promote strategies to reduce the sources of waste
- Utilize libraries as a platform to promote waste reduction, including launching zero waste, reuse, or upcycling workshops
- Promote public recognition programs for organizations with sustainable food waste management practices
- Practices that reduce contamination in green and blue bins and increase the use of existing waste programs

Goal 6: To provide adequate surface drainage and flood control facilities to protect public health and safety

NEW POLICIES:

The County shall

26. Review Floodplain and Sea Level Rise Maps and Restrict At-Risk Development to Sacrificial Uses and facilitate informed decisions by the cities based on modeling, forecasts, and experience of extreme rain and storm events.

27. Advocate Siting of Energy Infrastructure to Avoid Flood and Sea-Level Rise Hazards and other incompatible land use; and, advocate for reduced reliance on

transmission lines in favor of local Distributed Energy Resources to further ensure reliable, resilient, cost-effective energy.

GOAL 7: *To promote the efficient distribution of public utility facilities and transmission lines to ensure that public utilities are adequate to service existing and projected land uses and are sited to avoid hazards and land use incompatibility.*

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. (JP) [Source: New Policy]

ADD: while avoiding unnecessary vegetation removal

GOAL 8: *To promote public community facilities and services to provide robust educational, community and social engagement.*

28. Community Facility Design to Promote Safety During an Evacuation

The County shall assure that **community facilities are designed for safety during an evacuation** by conducting a study of how existing facilities and requirements for new facility designs allow provision for the immediate needs of disaster evacuees, typically for less than 72 hours including basic life-sustaining services:

- triage,
- water and food, sanitation, a place to lie down to sleep,
- basic medical care, disaster-related information, and
- energy to charge cell phones and refrigeration for medicines until the threat has passed, or until shelter residents transfer or transition to a Short-Term Shelter.

GOAL 9: *To provide individuals free access to library collections, resources, and services to help them be successful in their educational and work goals, and to serve as a social and cultural hub where community members can engage and collaborate to improve their overall quality of life.*

29. The County shall ensure that **libraries promote access to climate change information** comprising factual scientific data, information, and literature based on robust and accurate STE3M3 (scientific, technical, environmental/economic/ethical, medical/mathematical/management) evidence of

global climate change to assist library users and the public to understand the science, the significance, the implications, and appropriate responses and actions to mitigate global climate change and adapt to local impacts.

GOAL 10: *To develop and maintain a comprehensive system of parklands and recreational facilities that meet the active and passive recreational needs of residents and visitors, as funding is available.*

30. The County shall ensure that **best practices for soil and biomass conservation and enhancement** are applied to trails, parks and additional lands for public use to maximize biological carbon sequestration.
 31. The County shall ensure that **essential emergency support for disaster evacuees** can be provided at parks, such as for triage, distribution of water and food, sanitation, and a place to lie down to sleep.
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