June 13, 2019 Ventura County Planning Commission Hearing

CFROG Comments on Chapter 5: Public Facilities, Services and Infrastructure Element
Ventura County 2040 General Plan, Preliminary Public Review Draft

There is no single more important land-use action to be undertaken during the next twenty years in Ventura County --- and in all other local, state and national governments--- than aggressive reduction in the emission of greenhouse gases. The very future of the planet relies on rapid reduction in GHG emissions, adaptation to the changes that we cannot prevent, and implementation of land-use policies that accelerate the sequestration of carbon, which is the only practical and currently available means for geoengineering the reduction of GHGs already present in the atmosphere.

While the emission reduction goals of the draft General Plan (GenPlan) are laudable, and in accord with goals of the State of California, the draft Climate Action Plan (CAP) is essentially a business-as-usual plan that fails to provide enough emission reduction to meet, or even make a sizable dent, toward the state-mandated climate goals.

Until the draft plan was recently released, it was not obvious that the combined set of draft CAP policies would be so weak and insufficient that they would fail to make reasonable quantitative progress toward the laudable GHG emission reduction goals. A GenPlan is only as good and as useful as its policies – and these must be clear, definitive and actionable, and able to demonstrate that they can meet the goals of the plan.

Climate reality is the challenge of this generation. We will either confront this challenge head-on with the prospect of limiting the damage, or we will leave in our wake misery and destruction like our species has never encountered. This effort is no less daunting than our nation’s preparation for a war to confront the fascists in the early 1940s. We did it then, we can do it now, once the threat is honestly recognized and leaders and policy makers step forward to galvanize our collective will. When we as a people resolve to do something necessary or great, we have dug deep and shown the will and the grit to get it done.

It is time to ensure that our County confront this critical challenge with direct and forceful policies that simultaneously unwind the demand for fossil fuels --- as well as put forth a phase-out plan for production.
Following are CFROG’s comments and suggestions on specific draft policies in the draft GenPlan chapter:

1. Support policy PFS-1.2
2. Support policy PFS-1.3
3. Support policy PFS-1.10
4. Oppose as worded PFS-2.1, “shall encourage” is weak policy language and should be replaced with “require”. Support following correction
5. Oppose as worded PFS-2.2, “shall encourage” is weak policy language. Many of these design features should be adopted by the county as a matter of practice. Rewrite to indicate which design features will always be adopted and develop policy criteria for adoption of any features that may not be universally adopted.
6. Support policy PFS-2.3
7. Support policy PFS-2.4
8. Oppose as worded PFS-2.5, “shall encourage” is weak and undefined policy language. This policy should be rewritten as specific policy(s) and/or incentives
9. Oppose as worded policy PFS-2.6, “where economically feasible” is undefined, weak and does not reflect the urgency of transitioning to clean energy sources for transportation. A more appropriate policy would be: “The County shall convert its vehicle fleet to all electric. Starting immediately no gasoline or diesel-powered passenger vehicles will be added to the fleet; and, wherever available, trucks, buses and heavy-duty vehicles shall be electric.” You might also write the policy to include hydrogen fuel cells vehicles where the hydrogen is derived from clean energy sources.
10. Oppose as worded policy PFS-2.8, “to the extent feasible” is weak and undefined. Minimum parking ratios should be established and expansion options to accommodate future growth in EVs should be explicitly identified.
11. Oppose as worded policy PFS 4.4, “shall encourage” is weak policy language. Use stronger verb that shows that something will occur having a climate benefit.
12. Oppose as worded PFS-4.5, again, “encourage” is weak policy language and should be replaced with clearer direction and, wherever possible, specific requirements and/or actions.
13. Support policy PFS-5.4
14. Support policy PFS-5.5; adding specific support activities would make for a better policy
15. Support policy PFS-5.6; as with policy above, more specific language on what actions will take place to support these alternatives would make the policy more actionable
16. Support policy PFS-6.3
17. Support policy PFS-6.4
18. Support policy PFS-7.2
19. Support policy PFS-7.6 but ONLY if another policy is added for non-utility smart grids, or distributed energy systems, that may be developed by institutional organizations within the county using non-fossil generation (e.g. solar and/or wind) with energy storage (e.g., battery) backup systems
20. Support policy PFS-12.4
21. Add policy to transition existing County facilities that burn natural gas to transition to electric equipment. New facilities should be all-electric