

# Exhibit 3, BH-2-2

Unincorporated Industrial Lands Analysis of Development  
Potential

Receive and File Second Planning Division  
Presentation Regarding General Plan Policy EV-4.4  
and Programs COS-O and HAZ-O to Identify  
Suitable Lands and Priority Areas for the  
Development of Renewable Energy Generation and  
Storage Projects

PL23-0075

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## **Unincorporated Industrial Lands Review of Development Potential**

On September 15, 2020, the Ventura County Board of Supervisors adopted the 2040 General Plan and certified the project's Environmental Impact Report and related documents. The adopted 2040 General Plan contained policies and programs that direct the County to support and encourage the expansion of the green economy, including renewable energy. This is highlighted specifically with General Plan Programs COS-O, Assessment of Land Near Electrical Transmission and Distribution Lines, HAZ-O, Solar Concentration Restriction, and Policy EV-4.4, Renewable Energy Facilities. In support of these programs and policy, the Ventura County Resource Management Agency and Ascent Environmental, Inc (Ascent) prepared the Ventura Renewable Energy Siting Assessment (County Assessment) that identified undeveloped and underutilized sites within the unincorporated areas of the southern half of Ventura County that are suitable for grid-scale renewable energy projects consisting of solar arrays, wind turbines, and battery energy storage projects.

On September 26, 2023, The Board of Supervisors received and filed the County Assessment and heard a presentation regarding three potential options for regulatory amendments to address the policy and programs described above. After deliberation, the Board voted to create a fourth option, which was for staff to consider comments and to return with additional findings and options. One specific Board request was for a more detailed review of the unincorporated industrially designated lands to see if there is enough acreage to accommodate renewable energy uses, specifically battery energy storage. The analysis presented in this exhibit determined that there are approximately 71 acres of vacant and 168 acres of underutilized unincorporated industrially zoned lands that could accommodate battery energy storage uses; however, sole reliance on these lands could cause a significant economic impact on the County as explained below.

The purpose of this Exhibit is to summarize a brief parcel-by-parcel level analysis of the identified unincorporated industrially designated lands. Given the compressed timeline of this project, this review was primarily based on aerial imagery and also included consideration of how these parcels were ranked in the County Assessment.

### General Plan Alternatives and Background Report

As part of the Alternatives Report for the 2020 General Plan, a process was created to identify the amount of potential additional commercial and industrial square footage that can be built on parcels that are not fully developed. This information was presented to the Board of Supervisors during the September 26, 2023, study session, which recognized that the Alternatives Report analysis was conducted on a broad level and not on a parcel-by-parcel basis. This review found that the County had 751 to 165<sup>1</sup> acres, and 1,201 to 771<sup>1</sup> acres of vacant and underutilized commercial and industrial zoned lands,

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<sup>1</sup> The two separate acreage calculations are based on two different criteria; 1) the pure number of parcels without taking into account any constraints, and 2) the number of acres after factoring out constraints that included slopes greater than or equal to 20%, floodways, tax exempt, or located within the Coastal Zone.

respectively<sup>2</sup>. The General Plan Background Report further refined the amount of vacant industrial zoned lands, identifying 137 acres<sup>3</sup>.

Given the limited land available for industrial growth, the Background Report identified that the jobs holding capacity of the remaining industrial lands will fall below the projected growth demand in the unincorporated area by 2040. In fact, the Background Report found that there will be a deficit demand of 6.6 industrial acres by 2040 which means that there is no excess supply margin of industrial zoned lands, which is important to maintain job growth and an efficient real estate market.

### Ventura Renewable Energy Siting Assessment

General Plan Program COS-O states that the County shall study and identify suitable lands near electrical transmission and distribution lines for renewable energy generation and storage sites. Given these parameters, the County Assessment that was conducted in Summer 2023 focused on the southern half of the County since that is where the electrical transmission and distribution lines and substations are located. The County Assessment included an evaluation of criteria related to the feasibility of siting grid-scale renewable energy projects consisting of ground-mounted solar arrays, wind turbines, and battery storage projects. The criteria were based on policy and zoning factors, potential environmental impacts, as well as hazards. If a given area was deemed unacceptable (e.g., land zoned for high-density urban residential uses), located outside the County's jurisdiction (e.g., federal or state lands), or owned by a conservation agency or organization (e.g. Santa Monica Mountains Conservancy, Ventura Land Trust), that area was removed from consideration. Additional criteria were used to further filter the remaining lands that included, but were not limited to, distance from transmission and distribution lines and substations, steep slopes, floodplain locations, fire hazard severity zones, and biological resources. Each criterion was prioritized as either "Preferred" (ranking score assigned as +1), "Acceptable" (ranking score assigned as 0), or "Acceptable but Discouraged" (ranking score assigned as -1). These criteria and prioritizations were applied to each of the three renewable energy project types described above and the scores were summarized for each criterion across lands in the study area. These criteria were then used to generate maps with summarized ranking scores that had various ranges. For example, battery energy storage had a score range from -5 to +4. This was then used to estimate acreages for Optimal<sup>4</sup> locations and acres associated with each energy type.

For the purposes of this Exhibit, the following summary is focused on battery energy storage. The County Assessment found that there are currently 50 high-ranked, or "Optimal" industrially designated acres that could accommodate battery energy storage. While the County Assessment found that there are 50 Optimal acres of industrial lands

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<sup>2</sup> [https://vc2040.org/images/uploads/2018/Alternatives\\_Report\\_Ch.1-6.pdf](https://vc2040.org/images/uploads/2018/Alternatives_Report_Ch.1-6.pdf)

<sup>3</sup> [https://docs.vcrma.org/images/pdf/planning/plans/VCGPU\\_03\\_Adopted\\_Land\\_Use\\_September\\_2020.pdf](https://docs.vcrma.org/images/pdf/planning/plans/VCGPU_03_Adopted_Land_Use_September_2020.pdf)

<sup>4</sup> Optimal refers to the top two positive score categories for each of the energy types in the County Assessment. For example, the battery energy storage had a score range of -5 to +4, so the Optimal lands would be those that received a +3 or +4.

that could potentially meet the County's needs, it was a broad study that did not include parcel-level details that may further limit the number of available Optimal-ranked acres including, but not limited to, property owner interest, property improvement values, parcel sizes and configurations, and access to and across other properties. The Assessment also only focused on Optimal acres and the summary results did not include a total number of medium-scored "Acceptable" sites (identified as a summarized ranking score equal to or between 0 and 2).

### Vacant and Underutilized Land Assessment

Subsequent to the September 26, 2023, Board hearing and direction, a review of industrial zoned lands was conducted. This review consisted of an aerial review of parcels and the approximation of development potential focusing on parcels that were 5-acres<sup>5</sup> or greater and received County Assessment summarized ranking score of Optimal (+3) or Acceptable (equal to or between 0 and 2). These two categories were selected as they represent some of the most opportune areas of the County and contain the smallest number of site constraints which would allow for maximum development. This visual assessment allowed for a parcel-by-parcel evaluation of the sites so they could be classified more precisely as being fully developed, vacant, or underutilized. Below are the categories that were used to classify the parcels in this assessment:

- Vacant. A parcel was deemed to be vacant if it was devoid of buildings and contained unkempt vegetation or active agriculture.
- Underutilized. A parcel was deemed to be underutilized if the building coverage was estimated to be 25% or less of the parcel. However, some allowed uses in the unincorporated lands do not require buildings but still utilize a significant portion of a property or have significant economic value, e.g., automobile impound yards or outdoor building materials storage.
- Other Lands. A parcel was deemed to fall under the other lands category if it was larger than 5-acres but did not receive an Optimal or Acceptable score.
- Fully Developed. A parcel was deemed to be fully developed if the building coverage was estimated to be greater than 25% of the parcel.

### **Results**

It was found that there are 71 and 168 acres of vacant and underutilized industrially designated lands respectively in the unincorporated County after conducting the industrial land visual review. This is consistent with the County Assessment as the industrial land visual review was expanded to capture additional lands that were not Optimal. Additionally, these acreages represent a smaller amount of vacant or underutilized land in both General Plan's Alternatives Report and the Background Report.

While the total 237 acres could potentially accommodate the total estimated energy storage demand for the County through 2035, the sole reliance on industrial lands could

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<sup>5</sup> Assuming that in order to construct a 100 MW grid-scale battery energy storage facility and the 50% lot coverage limit within the industrial zones, the minimum parcel size for a project is 5-acres.

result in a significant economic impact. As previously stated, the General Plan Background Report found that the unincorporated County currently faces a deficit in the land demands for industrial uses and that the current amount of industrially designated lands cannot accommodate the projected industrial job growth. Funneling battery energy storage and other types of renewable energy into the industrial zoned lands could further impact industrial job growth potential, given that battery energy storage, solar, and wind facilities are typically unstaffed facilities that do not represent a significant source of permanent employment.

Vacant Lands

As stated above, a parcel was deemed to be vacant if it was devoid of buildings and contained unkempt vegetation or active agriculture. Based on this criterion, the visual review identified there were approximately 71 acres of industrially zoned land that were vacant (Table 1). However, the City of Ventura is reviewing an annexation request and development project on a 24.9-acre parcel (APN 069-0-020-015). This one parcel represents 35% of the total vacant land and if the annexation is approved, the parcel would need to be removed from this analysis of unincorporated lands. Additionally, a majority of these lands are located within the North Ventura Avenue Area Plan which has limited proximity to transmission lines because the area is bisected east-west by one medium voltage line. The closest high voltage transmission line is located north of the area plan boundary.

Table 1: Vacant Industrial Lands

APN	Address	Base Zone	Acres	Vacant	Received Assessment score between 0 and 3
0630120015		M3	11.2	Yes	Yes
0630050290		M2	9.5	Yes	Yes
0630140475		M3	5.1	Yes	Yes
0630190275	4092 N Ventura Av	M2	7.9	Yes	Yes
0690020015	School Canyon Rd	M2	24.9	Yes	Yes
0900110280	Los Angeles Av	M2	6.7	Yes	Yes
0630220100		M3	5.9	Yes	Yes
<b>Total</b>			<b>71.1</b>		

Underutilized Land

As stated above, a parcel was deemed to be underutilized if the building coverage was estimated to be 25% or less of the parcel. This methodology was used as it reflects the same methodology used in the General Plan Alternatives Report. Using this method there would be 491 acres of underutilized land (Table 2). However, the Non-Coastal Zoning Ordinance also allows for outdoor uses in Industrial zones that do not require buildings, i.e. automobile impound yards and outdoor building materials storage, which can give the impression that a site is underutilized using the building coverage criteria resulting in a higher amount of underutilized sites. The review identified these locations and removed them from consideration as they are economically utilizing the site. The methodology was

further refined to take these uses into account as they represent a considerable economic use in addition to a physical building. Based on this refinement, there are 168 acres of underutilized industrially zoned lands in the unincorporated County. A majority of these sites are located within the North Ventura Avenue Area Plan and the Mission Rock Road industrial cluster between the Cities of Ventura and Santa Paula. The Mission Rock Road industrial cluster is not located near an electrical distribution or high voltage transmission line therefore, it would not represent a desirable location.

Table 2: Underutilized Lands

APN	Address	Base Zone	Acres	Underutilized	Received Assessment score between 0 and 3
630050245	4777 CROOKED PALM RD	M3	12.7	Yes	Yes
630200210		M3	10.7	Yes	Yes
630210085		M3	21.6	Yes	Yes
630040015		M2	11.2	Yes	Yes
630210105	3658 N VENTURA AV	M3	5.2	Yes	Yes
630200230		M3	5.3	Yes	Yes
680020025	2951 N VENTURA AV	M3	12.1	Yes	Yes
1330190110	VINEYARD	M2	6.1	Yes	Yes
630040085		M3	6.1	Yes	Yes
6630010555	1049 CAMINO DOS RIOS	M1	77.3	Yes	Yes
<b>Total</b>			<b>168.1</b>		

Other Lands

As stated above, a parcel was deemed to fall under the other lands category if it was larger than 5-acres but did not receive an Optimal or Acceptable score in the County Assessment. Based off this criterion, the visual review identified there were approximately 332 acres of industrially zoned lands (Table 3) in the unincorporated County that are not considered to be the best candidates for grid-scale battery energy storage facilities. Just because these lands did not receive an Optimal or Acceptable score does not mean that battery energy storage is not allowed on them, it means that these sites contain additional constraints that may prolong or prove challenging to potential projects. For instance, parcels 060-0-030-280 (139.48 acres) and 060-0-030-245 (100 acres) are located within the coastal zone and appear to be actively used for oil and gas production and are also substantially covered in environmentally sensitive habitat.

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Table 3: Other Lands that did not receive a score in the County Assessment for the siting of renewable energy and energy storage.

APN	Address	Base Zone	Acres	Underutilized	Vacant	Received Assessment score between 0 and 3
0630030135		M2	13.6	Yes	Yes	No
0600030255		M2	20.0	Yes	Yes	No
0630040060	N Ventura Av	M2	6.6	Yes	Yes	No
0630050145		M3	12.4	Yes	Yes	No
0630040160	5721 N Ventura Av	M2	22.0	Yes	No	No
0630200190	Shell Rd	M3	10.1	Yes	No	No
0600030245	PCH	M2/CM	100.0	Yes	No	No
0600030280	PCH	M2/CM	139.5	Yes	No	No
0630040095	Ventura Av	M3/OS	7.5	Yes	No	No
<b>Total</b>			<b>331.7</b>			

Fully Developed Lands

As part of the overall industrial parcel search fully developed properties were also identified to gain a better understanding of the industrially zoned landscaped. These parcels accounted for approximately 96.25 acres and are not included in the above discussion.

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