

August 6, 2019

Board of Supervisors
County of Ventura
800 South Victoria Avenue
Ventura, CA 93009

SUBJECT: General Plan Update Board of Supervisors Work Session No. 5: Consideration and Approval of the Preliminary Public Review Draft 2040 General Plan; Planning Division Case Number PL17-0141; All Supervisorial Districts.

RECOMMENDED ACTIONS:

1. **RECEIVE** and provide input on the Preliminary Public Review Draft 2040 General Plan (“draft General Plan” or “draft 2040 General Plan,” Exhibits SR-5 through SR-20), and direct Planning Division staff to revise the draft General Plan to incorporate revisions as approved by your Board;
2. **RECEIVE** and consider the Planning Commission’s recommended revisions to the draft General Plan (Exhibit 2), as well as Planning Division recommendations for Ojai Area Plan Policy 1.3.2.2, Policy COS-8.5, Policy PFS-4.X, Policy HAZ-1.6, Policy HAZ-10.11, Policy CTM-1.1, Conservation and Open Space Element Program V, and new Climate Action Plan Program Budget and Staffing, and direct Planning Division staff to revise the draft General Plan to incorporate such revisions as approved by your Board;
3. **RECEIVE** and consider public, focus group and advisory body comments and suggested revisions to the draft General Plan (Exhibits SR-1b, SR-2, SR-3, SR-4, SR-23 through SR-27, SR-29, SR-30, SR-32, SR-35, SR-36, SR-39, SR-40, SR-A through SR-H, and Exhibits 3 through 7), and direct Planning Division staff to revise the draft General Plan to incorporate such revisions as approved by your Board;
4. **RECEIVE** and consider Ventura County Health Care Agency suggested revisions to the draft General Plan (Exhibit 8), and direct Planning Division staff to revise the draft General Plan to incorporate such revisions as approved by your Board;
5. **DIRECT** the County Executive Office to complete a fiscal analysis on the costs related to the draft General Plan implementation programs scheduled for the first five years (2020-2025) as part of the General Plan Update project; and
6. **DIRECT** Planning Division staff to prepare the 2040 General Plan Program Environmental Impact Report (EIR) based on the draft General Plan approved by your Board.



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County of Ventura, Board of Supervisors
Case No. PL17-0141

Exhibit 3 - Board Letter for Board of Supervisors' General Plan Update Work Session No. 5 on August 6, 2019

Planning



FISCAL IMPACTS/MANDATES:

Mandated: No
 Source of Funding: General Fund (Division 2910)
 Funding Match Required: None
 Impact on Other Departments: None

On September 22, 2015, your Board approved a General Plan Update (GPU) Work Program/Scope of Work with an estimated budget of \$4,400,000 in general fund monies. This estimate included funding for 2.5 full-time equivalent Planning Division staff and consulting services. On December 15, 2015, your Board approved a contract in the amount of \$2,368,786 to retain the services of a consultant team led by Mintier Harnish to assist with the GPU project. To date, \$1,449,320 of the contract amount has been expended from this consulting budget. As of June 30, 2019, there is a balance of \$615,000 to fund the continued work of the Planning Division staff GPU team.

Current FY 2019-20 Budget Projection for RMA Planning (Budget Division 2910)				
	Adopted Budget	Adjusted Budget	Projected Actual	Estimated Savings/Deficit
Appropriations	\$ 6,321,650	\$ 6,321,650	\$ 6,321,650	\$ -
Revenue	\$ 3,676,049	\$ 3,676,049	\$ 3,676,049	\$ -
Net Cost	\$ 2,645,601	\$ 2,645,601	\$ 2,645,601	\$ -

BACKGROUND:

The scope of work for the GPU project includes the completion of several key documents that support the development of the updated General Plan. Your Board directed the Planning Division to complete the GPU project by summer 2020. On November 6, 2018, your Board directed staff and project consultants to prepare the draft General Plan. The draft General Plan was completed in early May 2019 and was made available to the public for review on May 9, 2019. To reach a wide variety of county residents and stakeholders, staff conducted the following community outreach to secure initial public, focus group and advisory body input on the draft General Plan:

- Presentations to the Ojai Valley, El Rio, Somis, Casa Conejo, Santa Rosa Valley, and Oak Park Municipal Advisory Councils;
- Held six focus group meetings with issue-area experts and the public for the topical areas of transportation and infrastructure, climate change, agriculture, open space and recreation, economic development, and water;
- Hosted seven open houses throughout the county, two of which included certified Spanish and Mixteco language interpretive services (Heritage Valley and El Rio / Del Norte); and
- Presentation to the Agricultural Policy Advisory Committee (APAC).

Staff and consultants presented the draft General Plan as well as public, focus group and advisory body input to the Planning Commission at work sessions held on June 6, 13, and 20,

2019. The Planning Commission reviewed and provided recommended revisions to your Board regarding the draft General Plan's goals, policies and programs during each work session. The Planning Commission staff reports, updated to address items for discussion during the individual work session dates, are attached as Exhibit 1a. This Board letter includes the Planning Commission Work Session No. 4 unofficial minutes for June 6, 13, and 20, 2019, which are attached as Exhibit 9. To stay on schedule with the GPU project timeline and bring the draft General Plan to your Board today, the Planning Commission directed Planning Division staff to present its recommendations to your Board without formal minute approval. Using these minutes, staff has included Planning Commission recommended revisions in legislative format to the respective draft General Plan goal, policy or program in this Board letter (Exhibit 2). These recommendations are included in the sections below, which also present a brief overview of the draft General Plan elements.

This Board work session represents the final task for Phase 5 of the GPU project. The next task will be the preparation of the Public Review Draft 2040 General Plan, based on direction from your Board at today's work session. This draft document will also serve as the project description for the Program EIR.

DISCUSSION:

The discussion below of the draft General Plan is divided in three parts to guide the public and your Board in the materials provided and identifies the main items which will be presented, and direction sought during the Board hearing. Part One provides the framework and summaries for each element of the draft General Plan, including which new or updated elements are state mandates the County must implement. Part Two presents the Planning Commission's recommended revisions and staff's comments on a limited subset of those recommended revisions. Part Three presents certain key policies and programs that we request your Board consider. Following Part Three, the public comment process is summarized.

PART ONE - DRAFT GENERAL PLAN FRAMEWORK AND ELEMENTS

This section provides a brief overview of the draft General Plan (Exhibits SR-5 through SR-20) and summary information related to each General Plan element. It focuses on new goals, policies and implementation programs that have been introduced and summarizes the Climate Action Plan (Appendix B: Climate Change). It also describes the limited revisions made to Area Plans pursuant to Board direction, which include amending text for consistency with the draft General Plan, reducing redundancies and reformatting Area Plans to be consistent with the draft General Plan.

Local Coastal Program versus Draft General Plan

The County's Coastal Area Plan and the Coastal Zoning Ordinance together constitute the "Local Coastal Program" (LCP) for the unincorporated portions of Ventura County's coastal zone. The primary goal of the LCP is to ensure that the local government's land use plans, zoning ordinances, zoning maps, and implemented actions meet the requirements, and implement the provisions and polices, of the Coastal Act at the local level. All amendments to the Coastal Area

Plan and Coastal Zoning Ordinance are subject to review and approval by the California Coastal Commission (CCC).

The draft General Plan applies to both coastal and non-coastal unincorporated areas of the county but is not subject to CCC review and approval. However, specific goals, policies and programs for unincorporated areas within the coastal zone, which are included in the Coastal Area Plan, are subject to CCC approval. The GPU project does not include an update of the Coastal Area Plan as part of the draft General Plan. However, the existing General Plan does include policies specific to the coastal zone, which have been integrated into the draft General Plan. For example, Conservation and Open Space Element Policy COS-2.5, "Shoreline Protective Structure Design," has been carried over from the existing General Plan (Policy 1.10.2.3) into the draft General Plan. It states: "*The County shall require all shoreline protective structures which alter natural shoreline processes to be designed to eliminate or mitigate adverse impacts on local shoreline sand supplies.*" Given that this policy applies to unincorporated areas in the coastal zone, the County has included an Implementation Program in the draft General Plan (Land Use Element, Program G – "Update Coastal Area Plan") which requires a LCP amendment to move this policy as well as other draft General Plan policies specific to unincorporated areas in the coastal zone to the Coastal Area Plan.

The draft General Plan also includes new policies that address climate resilience and adaptation pursuant to the requirements of new state law. The climate resilience and adaption goals, policies and programs in the draft General Plan address topics, such as sea level rise, that affect the unincorporated coastal (i.e., within the coastal zone) and non-coastal areas. As the draft General Plan applies to all unincorporated areas of the county, new policies that address topics such as sea level rise have been included in this update. For example, the Hazards and Safety Element includes Policy HAZ-3.2, "County Infrastructure Projects and Sea Level Rise," which states: "*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.*" This policy has been included as a planning guideline for County-initiated infrastructure projects. Any future design or development standards associated with this policy and applicable to unincorporated areas in the coastal zone would be included in the LCP in a separate work session before your Board on September 10, 2019.

A. General Comments

The County's existing General Plan is comprised of five documents: the goals, policies and implementation programs document, and four appendices addressing land use, hazards, public facilities and services, and resources. The revised draft General Plan has been reorganized into two primary documents: one containing the goals, policies and implementation programs (sometimes referred to as the "Policy Document"), and a Background Report which contains a summary of the County's existing conditions and a description of a wide range of topics including demographics, public facilities, resources, etc. The Background Report has already been completed and reviewed by your Board, although it will be revised as necessary (e.g., new fire

hazard maps to reflect the Thomas and Woolsey burn areas will be added) during completion of the 2040 General Plan Program EIR and before final adoption of the updated General Plan.

The organization of the revised draft General Plan incorporates all the state-mandated general plan elements as reflected in Table 1 below.

Table 1: Elements of the Ventura County 2040 General Plan

2040 General Plan Elements	State Mandated Elements									Optional Elements
	Land Use	Circulation	Housing	Conservation	Noise	Open Space	Safety	Air Quality	Environmental Justice	
Land Use and Community Character	■					■			■	
Housing			■						■	
Circulation, Transportation, and Mobility		■							■	
Public Facilities, Services, and Infrastructure	■	■		■			■		■	
Conservation and Open Space				■		■			■	
Hazards and Safety	■				■		■	■		
Agriculture	■			■		■			■	■
Water Resources	■			■		■			■	■
Economic Vitality										■

While many proposed policies can be implemented as part of existing County operations, some policies require specific implementation programs. These programs are included in the last section of each element. They are shown in a table along with information listing those policies they are intended to address, the agencies with primary and secondary implementation responsibility, and the timeframe for program completion. Many of the existing General Plan goals, policies and programs were retained in the revised draft General Plan. To facilitate review of the draft General Plan, each goal, policy and program is coded at the end indicating whether it is new, or derived from an existing goal, policy or program. These notations will be removed in the final 2040 General Plan.

In addition to summarizing the overall topical organization of the draft General Plan, staff has identified the total number of goals, policies and programs in the draft General Plan, how these numbers compare to the existing General Plan, and how many of the proposed goals, policies,

and programs are new. Table 2 below identifies the total number of goals, policies, and programs in both the 2005 General Plan and draft 2040 General Plan.

Table 2: Total Number of Goals, Policies, and Programs in 2005 General Plan and Draft 2040 General Plan

	2005 General Plan	Draft 2040 General Plan
Goals	145	80
Policies	216	498
Programs	171	126
<i>Total</i>	532	704

Note: This does not include Area Plans (Exhibit SR-16).

There are 413 new goals, policies, and programs that were added to address new state-mandated requirements (e.g., Environmental Justice, Complete Streets, Climate Adaptation), additional elements requested by your Board (i.e., agriculture, water resources, and economic vitality), and three cross-cutting themes described in detail below. In addition, more than half of the 2005 General Plan goals, policies, and programs were carried over into the draft 2040 General Plan (291 out of 532). During the Area Plan reformatting process, staff identified 17 goals, 28 policies, and 1 program to migrate into the draft 2040 General Plan to apply to all unincorporated areas. The majority of migrated Area Plan items address land use, conservation and open space. Table 3 below identifies the number of goals, policies, and programs in the draft 2040 General Plan and notes whether the goals, policies or programs are existing or new.

Table 3: Number of Combined Goals, Policies, and Programs in the Preliminary Public Review Draft 2040 General Plan Based on Source

Draft 2040 General Plan Elements	2005 General Plan (Source: Existing)	Draft 2040 General Plan (Source: New)	Total
Land Use and Community Character	74	64	138
Housing*	N/A	N/A	N/A
Circulation, Transportation, and Mobility	30	65	95
Public Facilities, Services, and Infrastructure	45	64	109
Conservation and Open Space	48	57	105

Draft 2040 General Plan Elements	2005 General Plan (Source: Existing)	Draft 2040 General Plan (Source: New)	Total
Hazards and Safety	66	60	126
Agriculture	11	35	46
Water Resources	16	26	42
Economic Vitality	1	42	43
<i>Total</i>	291	413	704

*Notes: This does not include Area Plans (Exhibit SR-16). *This table does not include a count for Housing because the 2021-2029 Housing Element Update will occur under a separate adoption process in Fall 2021.*

In addition to the traditional elements, there are three cross-cutting themes that your Board directed staff to include in the draft General Plan: Climate Action Plan (CAP), Environmental Justice (EJ), and Healthy Communities (HC). These themes are identified in policies and implementation programs throughout the document and are briefly described below.

- **Climate Action Plan (CAP):** The 2040 General Plan will serve as the County’s CAP by including both a Greenhouse Gas (GHG) Emissions Reduction Strategy and Climate Change Adaptation and Resilience Strategy that are integrated throughout the 2040 General Plan. The GHG Strategy identifies policies and implementation programs that establish GHG emissions reduction targets and GHG reduction measures to achieve the targets in the unincorporated county, consistent with state mandate, guidance and applicable GHG protocols.
- **Environmental Justice (EJ):** State law (SB 1000) and the Governor’s Office of Planning and Research (OPR) require that general plans include policies and objectives addressing health risks within designated unincorporated disadvantaged communities pursuant to Government Code section 65302(h).
- **Healthy Communities (HC):** Your Board directed staff to include the “2015 Health in All Policies Framework” in the draft General Plan. This framework encourages cross sector policies designed to improve community health and promote health equity. The Healthy Communities concepts have been included to focus on and promote healthy communities and the connection between the built environment and public health. Policies and programs with a Healthy Communities icon address sustainability, supporting economic and social development, ensuring social equity, and encouraging social relationships that are supportive and meet residents’ basic

needs across a lifespan. Table 4 below identifies the number of Environmental Justice, Healthy Communities and Climate Action Plan policies and programs by element.

Table 4: Cross-Cutting Policies and Programs – Environmental Justice, Healthy Communities and Climate Action Plan

2040 General Plan Elements	Policies			Programs		
	Environmental Justice (EJ)	Healthy Communities (HC)	Climate Action Plan (CAP)	EJ	HC	CAP
Land Use and Community Character	14	12	7	0	0	2
Housing*	N/A	N/A	N/A	N/A	N/A	N/A
Circulation, Transportation, and Mobility	3	24	28	3	5	5
Public Facilities, Services, and Infrastructure	16	25	19	1	6	9
Conservation and Open Space	7	6	23	4	2	16
Hazards and Safety	10	14	23	3	5	14
Agriculture	2	3	13	3	4	13
Water Resources	6	5	10	6	6	5
Economic Vitality	8	5	1	3	0	0
Total	66	94	124	23	28	64

**This table does not include a count for Housing because the 2021-2029 Housing Element Update will occur under a separate adoption process in Fall 2021.*

Following below in sections B – O is a summary of each element of the draft General Plan.

B. Land Use and Community Character Element (LU)

The Land Use and Community Character Element (LU Element) establishes a pattern and intensity of land use for the unincorporated areas of the county. The LU Element identifies the County’s philosophy for future change, development, and natural resource protection, with a focus on preserving agricultural, rural, and open space lands while directing growth to cities and unincorporated Existing Communities.

Policies and Implementation Programs

The new policies in the LU Element address regulations that are being integrated into the draft General Plan for the first time, including those related to environmental justice and civic engagement, military land use compatibility and maintenance of the General Plan. With respect to land use designations and standards, there are new policies related to increasing residential densities for accessory dwelling units, encouraging live-work developments and supporting the development of parks in unincorporated areas within Existing Communities and Area Plans.

There are 15 implementation programs in the LU Element, eight of which are new and not otherwise among the set of Joint Land Use Study policies supported in 2015 by your Board related to operations at Naval Base Ventura County. Several reflect existing land use practices and philosophies (e.g., adhere to Guidelines for Orderly Development, maintain General Plan consistency, conduct General Plan review), but new programs have been developed to formalize and track these practices. Program F identifies the schedule for all nine Area Plan updates, and Program G (Update Coastal Area Plan) specifies that policies specific to the coastal zone will be moved from the existing General Plan to the Coastal Area Plan as part of the next Coastal Area Plan update. See Exhibit SR-6, Page 2-59 for Implementation Programs.

The Land Use and Community Character Element includes the following nine subsections:

- 2.1 – Growth Management
- 2.2 – Land Use Designations and Standards
- 2.3 – Area Plans
- 2.4 – Character and Design
- 2.5 – Environmental Justice
- 2.6 – Civic Engagement
- 2.7 – Development Review and Inter-Agency Coordination
- 2.8 – Military Compatibility
- 2.9 – General Plan Maintenance

Planning Commission - Recommended Revisions

Exhibit 2 identifies the recommended revisions to the Land Use and Community Character Element (LU) proposed by the Planning Commission during the work sessions held in June 2019.

C. Housing Element (HE)

As described in the GPU Scope of Work, the update of the Housing Element was not included as part of the draft General Plan currently under review. Rather, a placeholder Housing Element chapter is included in the draft General Plan (Exhibits SR-5 through SR-20). However, on November 6, 2018, your Board directed staff to explore the County's Regional Housing Needs Allocation (RHNA) in preparation for the next Housing Element Update. The draft RHNA allocation for the 2021-2029 Housing Element 6th cycle will be released in February 2020 to cities and counties within the Southern California Association of Governments (SCAG) region. After release of the RHNA numbers, the County is required to identify sufficient development

capacity to accommodate housing for all household income categories (i.e., extremely low-, very low-, low-, moderate-, and above moderate-income). This requires the County to prepare an inventory of specific sites, describe the density and existing uses of the sites, and specify the number of new dwelling units expected at various income categories on each site over this next eight-year Housing Element period.

Preliminary Regional Housing Needs Allocation

In anticipation of the SCAG release of the County's RHNA allocation, Planning Division staff completed a preliminary analysis of the County's existing Residential High Density (RHD) sites to determine if these sites may still be included. These sites accounted for 250 lower-income dwelling unit sites in the 2014-2021 Housing Element inventory, (Exhibit SR-34). Based on a preliminary analysis, approximately nine acres of RHD zoned land located within the El Rio/Del Norte Area Plan (179 potential units) do not meet new statutory requirements to provide sufficient water to meet fire flow requirements. In addition, it appears that 30 units identified on a site in Piru may no longer be eligible due to the location of the site which is partially within the 100-year floodplain. Additionally, the site no longer meets the stricter statutory definition of the term "vacant." This will result in a potential reduction of 209 lower-income dwelling units that the County cannot use in the 2021-2029 Housing Element inventory, leaving 41 dwelling units still likely eligible on existing RHD zoned sites. However, these remaining sites are subject to new statutory requirements whereby any inventory sites not developed during the Housing Element cycle are "presumed not feasible" and cannot be further counted towards RHNA unless further evidence is provided and accepted by the State Housing and Community Development Department (HCD) to justify the site.

2021-2029 Housing Element – Statutory Deadlines

More precise targets for lower-income housing will be forthcoming from SCAG in the coming months. However, the County must have an adopted Housing Element, fully certified by HCD, no later than October 15, 2021. As of July 1, 2019, jurisdictions that fail to meet the statutory deadline are subject to penalties ranging from \$10,000 to \$100,000 per month until they come into compliance and are then subject to a four-year housing element cycle rather than an eight-year cycle.

Concurrent with the GPU project, the Planning Division, Long Range Planning Section, will continue to evaluate the County's RHNA inventory and prepare the draft 2021-2019 Housing Element in anticipation of the SCAG RHNA allocation scheduled to be released in October 2020. Further technical analysis, public engagement, and an adoption process including Planning Commission recommendation and final action by your Board will occur in 2021.

D. Circulation, Transportation and Mobility Element (CTM)

The Circulation, Transportation and Mobility Element (CTM Element) focuses on creating and maintaining a transportation network that both meets the needs of all users for safe and convenient travel, and is suitable in rural, suburban, or urban contexts (Exhibit SR-

9). The element also serves as a strategy for addressing infrastructure needs to ensure the adequate circulation of people, goods, and services.

Policies and Implementation Programs

The new policies in the CTM Element focus mainly on the implementation of the state's Complete Streets laws, the introduction of "Vehicle Miles Traveled" (VMT) as a way of analyzing potential transportation impacts from discretionary projects, and planning for emerging technologies including autonomous vehicles, vehicle sharing and "mobility-as-a-service" infrastructure (e.g., Uber and Lyft).

There are 17 implementation programs in the CTM Element, 13 of which are new and not otherwise among the set of Joint Land Use Study (JLUS) policies supported in 2015 by your Board related to operations at Naval Base Ventura County. Some of the new programs reflect existing practices (e.g., update Traffic Impact Mitigation Fee Program, maintain a pavement management system), but new programs have been developed to formalize and track these practices. Other programs have been added to reflect the integration of new policies related to Complete Streets, JLUS, Safe Routes to School, and the safe movement of large trucks. See Exhibit SR-9, Page 4-26 for Implementation Programs.

The CTM Element includes the following six subsections:

- 4.1 – Roadways
- 4.2 – Regional Multimodal System
- 4.3 – Vehicle Trip Length and Frequency
- 4.4 – Air Transportation
- 4.5 – Emerging Technologies and Sustainable Practices
- 4.6 – Funding

Planning Commission - Recommended Revisions

Exhibit 2 identifies the recommended revisions to the Circulation, Transportation and Mobility Element (CTM) proposed by the Planning Commission during the work sessions held in June 2019.

E. Public Facilities, Services and Infrastructure Element (PFS)

The intent of the goals, policies and programs included in the Public Facilities, Services and Infrastructure Element (PFS Element) is to develop and maintain essential public facilities and services, prioritize energy efficiency, and ensure adequate levels of infrastructure funding.

Policies and Implementation Programs

The policies and programs in this element demonstrate the County's commitment to provide and maintain facilities and services necessary to maintain safe communities that can adapt to growth and change. The new policies in this section include a focus on ensuring that public facilities are resilient to climate change, capital improvements are prioritized based on an assessment of greatest public benefit, facilities are sited based on criteria that do not disproportionately impact

disadvantaged communities (an environmental justice requirement under state law), libraries are designed to meet current needs, and broadband access is adequate to serve the needs of unincorporated area residents and businesses.

There are 17 implementation programs in the PFS Element, 14 of which are new. The programs address a variety of new policy topics introduced in the draft General Plan, including state mandates for the need to monitor impacts of climate change on County facilities, reduce the generation of food waste that requires disposal, and update the Non-Coastal Zoning Ordinance (NCZO) to create a new Open Space zone for public lands that would be limited to parks and recreational uses. Other new programs have been added to address existing issues facing the County including a program to work with mutual water companies to address needs for future development and fire flow, as well as public education programs to ensure the proper care and maintenance of onsite wastewater treatment systems. See Exhibit SR-10, Page 5-17 for Implementation Programs.

The PFS Element includes the following 12 subsections:

- 5.1 - Public Facilities and Services
- 5.2 - Energy Efficiency for County Operations
- 5.3 - Infrastructure Funding
- 5.4 - Wastewater Treatment and Disposal
- 5.5 - Solid and Hazardous Waste
- 5.6 - Flood Control and Drainage Facilities
- 5.7 - Public Utilities
- 5.8 - Community Facilities
- 5.9 - Library Facilities and Services
- 5.10 - Parks and Recreational Facilities
- 5.11 - Law Enforcement and Emergency Services
- 5.12 - Fire Protection

Planning Commission - Recommended Revisions

Exhibit 2 identifies the recommended revisions to the Public Facilities, Services and Infrastructure Element (PFS) proposed by the Planning Commission during the work sessions held in June 2019.

F. Conservation and Open Space Element (COS)

The Conservation and Open Space Element (COS Element) is intended to help conserve and enhance the county's natural and open space environment. This element addresses a variety of topics including open space, habitat conservation, energy resources, greenhouse gas emissions, and climate change (Exhibit SR-11).

Policies and Implementation Programs

The new policies in the COS Element focus on climate change and GHG emissions reduction, energy resource conservation, sea level rise, identifying and protecting sensitive biological resources, and preserving open space.

There are 25 implementation programs in the COS Element, 21 of which are new. Of the new programs, several address various aspects of climate adaptation and GHG reduction planning, monitoring and reporting as required by state law. Other new programs emphasize the County's commitment to energy efficiency and conservation. Another subset of new programs addresses updates to the NCZO related to biological resources. These include revisions to the NCZO's tree protection regulations to plan for the effects of climate change on the urban forest and to further enhance conservation and preservation of the county's remaining oak woodlands, standards for compact development adjacent to scenic or sensitive biological resources, and an evaluation of the need for a standard wetland setback for development. See Exhibit SR-11, Pages 6-18 through 6-27 for Implementation Programs.

The COS Element includes the following 10 subsections:

- 6.1 - Biological Resources
- 6.2 - Coastal Resources
- 6.3 - Scenic Resources
- 6.4 - Cultural, Historical, Paleontological, and Archaeological Resources
- 6.5 - Soil and Mineral Resources
- 6.6 - Oil and Gas Resources
- 6.7 - Energy Resource Conservation
- 6.8 - Open Space
- 6.9 - Climate Change and Greenhouse Gas Emissions Reduction
- 6.10 - Implementation Programs

Planning Commission - Recommended Revisions

Exhibit 2 identifies the recommended revisions to the Conservation and Open Space Element (COS) proposed by the Planning Commission during the work sessions held in June 2019.

G. Hazards and Safety Element (HAZ)

The Hazards and Safety Element (HAZ Element) is intended to help protect the community from unreasonable risks associated with the effects of the following: wildfire hazards, flood hazards, sea level rise and coastal flooding, geologic and seismic hazards, hazardous materials, transportation related hazards, oil and gas production and transportation incidents, military compatibility, noise, air quality, and increasing temperatures (Exhibit SR-12).

Policies and Implementation Programs

The new policies in the HAZ Element focus on enhancing measures for wildfire and flood hazards as well as meeting new requirements of state law for military compatibility, climate change adaptation measures for sea level rise and increasing temperatures.

There are 24 implementation programs in the HAZ Element, 16 of which are new and not otherwise among the set of Joint Land Use Study policies approved by your Board related to operations at Naval Base Ventura County. The new programs focus on two key themes: (1) preparing for and improving resilience to wildfires, and (2) adaptation strategies related to potential impacts of climate change, including flooding, sea level rise, extreme heat, and building techniques. See Exhibit SR-12, Page 10-10 for Implementation Programs.

The HAZ Element includes the following 13 subsections:

- 7.1 - Wildfire Hazards
- 7.2 - Flood Hazards
- 7.3 - Coastal Flooding
- 7.4 - Geologic and Seismic Hazards
- 7.5 - Hazardous Materials
- 7.6 - Transportation Related Hazards
- 7.7 - Oil and Gas Production and Transportation Incidents
- 7.8 - Military Compatibility
- 7.9 - Noise
- 7.10 - Air Quality
- 7.11 - Increasing Temperatures
- 7.12 - Emergency Response
- 7.13 - Implementation Programs

Planning Commission - Recommended Revisions

Exhibit 2 identifies the recommended revisions to the Hazards and Safety Element (HAZ) proposed by the Planning Commission during the work sessions held in June 2019.

H. Agriculture Element (AG)

The Agriculture Element (AG Element) is intended to help protect, preserve, and expand productive agriculture (Exhibit SR-13).

Policies and Implementation Programs

The new policies in the AG Element focus mainly on food security and encouraging sustainable farming and ranching practices for resilience to climate change.

There are 14 implementation programs in the AG Element, all of which are new. To support agricultural viability, the programs address a range of issues, such as providing education about

the County's existing Land Conservation Act program, incentivizing the sale of locally-grown agricultural products, continuing to collaborate with University of California Extension on topics such as nutrient management plans, best management practices for water-saving irrigation techniques, and diversification of specialty agricultural products. In order to aid the County in meeting state-mandated GHG reduction requirements, there is also a subset of programs focused on greenhouse gas reductions and climate adaptation strategies related to the agricultural sector. These include seeking funding for alternative fuels used in agricultural operations, encouraging "carbon farming" (i.e., capturing carbon in vegetation and soils), and researching the effects of climate change on the agricultural industry. See Exhibit SR-13, Pages 8-10 through 8-14 for Implementation Programs.

The AG Element includes the following seven subsections:

- 8.1 - Agricultural Land Preservation
- 8.2 - Agricultural and Urban Area
- 8.3 - Niche and Specialty Agriculture
- 8.4 - Food Security
- 8.5 - Sustainable Farming and Ranching
- 8.6 - Agricultural Resilience
- 8.7 - Implementation Programs

Planning Commission - Recommended Revisions

Exhibit 2 identifies the recommended revisions to the Agriculture Element (AG) proposed by the Planning Commission during the work sessions held in June 2019.

I. Water Resources Element (WR)

The goals, policies and programs in the Water Resources Element (WR Element) recognize that water is an essential resource for the future of Ventura County, both for ensuring quality of life for residents and a sustainable economy (Exhibit SR-14). The WR Element also acknowledges that adequate water supply is an ongoing concern due to climate change, drought, the related declines in river flows and reservoir levels, historic overdraft of several local groundwater basins, curtailment of groundwater supplies in southern Ventura County, new groundwater well prohibitions, and reduced deliveries of imported water.

Policies and Implementation Programs

The new policies in the WR Element focus mainly on sustainable use of water supplies and groundwater, such as through reuse and conservation, as well as a focus on watershed-level management and agricultural water quantity and quality. Where applicable, these policies are labeled with icons for the following themes: six for Environmental Justice (EJ), five for Healthy Communities (HC), and 10 for Climate Action Plan (CAP).

There are eight implementation programs in the WR Element, six of which are new. Many of the programs focus on the need to collaborate with our regional partners to manage the county's water resources. Substantively, the programs address the need to monitor water supply and demand, manage invasive weeds within the county's watersheds, plan for the impacts of climate change on water resources, update ordinances dealing with sustainable use of groundwater, and educate residents on water conservation techniques. The following number of programs have icons: six for EJ, six for HC, and five for CAP. See Exhibit SR-14, Pages 9-9 through 9-10 for Implementation Programs.

The WR Element includes the following six subsections:

- 9.1 - Water Supply
- 9.2 - Water Conservation and Reuse
- 9.3 - Groundwater
- 9.4 - Watershed Management
- 9.5 - Water for Agriculture
- 9.6 - Implementation Programs

Planning Commission - Recommended Revisions

Exhibit 2 identifies the recommended revisions to the Water Resources Element (WR) proposed by the Planning Commission during the work sessions held in June 2019.

J. Economic Vitality Element (EV)

The Economic Vitality Element (EV Element) focuses on supporting a resilient economy that promotes the economic health of the county, sustainable funding for public services, a thriving business environment, agriculture as a business sector, and job retention and growth (Exhibit SR-15).

Policies and Implementation Programs

The new policies in the EV Element focus mainly on promoting labor force development and a business-friendly environment to attract new businesses and encourage small business development to expand key industry clusters for a diversified economy.

There are six implementation programs in the EV Element, all of which are new. In keeping with the Board-approved 2017 Ventura County Economic Vitality Strategic Plan, the EV programs focus on promoting infill on remaining vacant and underutilized commercial, industrial, and residential land, supporting workforce development and business retention by maintaining partnerships with key organizations, and by evaluating the County's own hiring practices to maximize local hiring. There is also a program focused on identifying necessary development standards for critical broadband infrastructure. See Exhibit SR-15, Pages 10-10 through 10-11 for Implementation Programs.

The EV Element includes the following five subsections:

- 10.1 - Business and Employment
- 10.2 - Diversified Economy
- 10.3 - Economic Foundations
- 10.4 - Labor Force Development
- 10.5 - Implementation Programs

Planning Commission - Recommended Revisions

Exhibit 2 identifies the recommended revisions to the Economic Vitality Element (EV) proposed by the Planning Commission during the work sessions held in June 2019.

K. Area Plans

The GPU scope of work calls for the integration of Area Plans into the draft General Plan. Tasks include: 1) comparing Area Plan goals, policies, and programs for consistency with the draft General Plan, 2) amending Area Plan text where necessary to eliminate redundancy or inconsistencies, and 3) reformatting Area Plans to be consistent with the updated General Plan. The scope of work did not include an update of the Coastal Area Plan nor the Saticoy Area Plan, although the General Plan incorporates these plans as adopted by the County (Exhibit SR-16 h through i).

At the November 6, 2018 joint Board of Supervisor/Planning Commission work session, your Board approved streamlining the existing General Plan as described in Chapter 9 of the Alternatives Report. Area Plans included in the draft General Plan (Exhibit SR-16, attachments a through g) illustrate this streamlining in legislative format. Note that Exhibit SR-16, attachments h and i, consist of the Coastal Area Plan (a separate active work plan) and the Saticoy Area Plan (comprehensively revised and approved in 2015), respectively, which were not reformatted. Table 5 below presents the number of goals, policies or programs transferred from the Area Plans listed below into the draft General Plan.

Table 5: Area Plan Goals, Policies Transferred to Preliminary Public Review Draft 2040 General Plan

Area Plan Summary							
Reformatted Area Plans	El Rio / Del Norte	Lake Sherwood / Hidden Valley	North Ventura Avenue	Oak Park	Ojai Valley	Piru	Thousand Oaks
Goals	5	2	0	4	3	1	2
Policies	4	7	0	7	4	4	2
Programs	1	0	0	0	0	0	0
<i>Total</i>	10	9	0	11	7	5	4

L. Glossary

The draft General Plan Glossary includes an alphabetical list of terms and words found throughout the various elements and defined in one location (Exhibit SR-17).

Planning Commission - Recommended Revisions

Exhibit 2 identifies the recommended revisions to the Glossary proposed by the Planning Commission during the work sessions held in June 2019.

M. Appendix A: Area Plan and Existing Community Land Use Maps

At the July 31, 2018 joint Board of Supervisor/Planning Commission work session, Planning Division staff and consultants were directed to revise the Existing Community and Urban land use designations. Appendix A includes revised Area Plan and Existing Community land use maps that depict the new land use designations within currently established Existing Communities (Exhibit SR-18). These designations include the following: ECU-Open Space, ECU-Agricultural, ECU-Rural, Very Low Density Residential, Low-Density Residential, and Medium-Density Residential.

Planning Commission - Recommended Revisions

Exhibit 2 identifies the recommended revisions to Appendix A, Area Plan and Community Land Use Maps, proposed by the Planning Commission during the work sessions held in June 2019.

N. Appendix B: Climate Change

As noted in the draft General Plan Introduction, the County developed an integrated approach to addressing climate change by incorporating related policies and programs throughout the draft General Plan elements, such that the General Plan will also serve as the County's Climate Action Plan (CAP). The purpose of the Climate Change Appendix is to provide further details regarding the General Plan's Greenhouse Gas (GHG) Emissions Reduction Strategy, GHG Emissions Inventory, and the Climate Change Adaptation and Resilience Strategy (Exhibit SR-19), which are all consistent with state mandates. Section B.1 of this Appendix includes the GHG Emissions Reduction Strategy, which includes a summary of results of key technical analyses used, while section B.2 of this Appendix includes the Climate Change Adaptation and Resilience Strategy, which documents the county's vulnerability to climate change and climate adaptation and resilience efforts to address these vulnerabilities.

Attachment 1 of this Appendix contains the technical data and documentation used to prepare the County's 2015 GHG Emissions Inventory, which quantifies emissions for the unincorporated area by sector (e.g., stationary sources, transportation, building energy). Attachment 1 will not be included in the adopted 2040 General Plan; rather it will be included as a technical appendix to the General Plan Program EIR.

Planning Commission - Recommended Revisions

Exhibit 2 identifies the recommended revisions to Appendix B, Climate Change, proposed by the Planning Commission during the work sessions held in June 2019.

O. Appendix C: SOAR (Save Open Space and Agricultural Resources) Ordinance

Appendix C includes the County of Ventura Save Open Space and Agricultural Resources Initiative – 2050 (SOAR) approved by Ventura County voters in November 2016 (Exhibit 20).

P. Existing General Plan Goals, Policies and Programs (GPP)

Exhibit SR-21 is a copy of the existing 2005 General Plan *Goals, Policies and Programs* annotated to identify the disposition of any goal, policy or program that is proposed to be retained in the draft General Plan or proposed for deletion as identified in legislative format. Additionally, Exhibit SR-22 presents non-substantive language modifications proposed for the draft General Plan goals and policies as authorized by the SOAR initiative ordinance at section 2, entitled “General Plan Amendment,” subsection 1.I(d).

PART TWO - PLANNING COMMISSION RECOMMENDED REVISIONS TO THE DRAFT GENERAL PLAN

The Planning Commission held the General Plan Update Work Session No. 4 over three consecutive weeks on June 6, 13, and 20, 2019. During these sessions, the Planning Commission considered public, focus group, and advisory body input received subsequent to the release of the draft General Plan in May 2019 (Exhibits SR-5 through SR-20). During each work session, GPU staff, project consultants and Technical Advisory Committee (TAC) members were available to respond to questions from the Planning Commission. Furthermore, to facilitate the participation of non-English speaking members of the public at the work sessions, certified Spanish and Mixteco language interpreters were available. Of the 704 goals, policies and programs in the draft General Plan, the Planning Commission recommended revisions to or additions of 119 goals, policies, programs and/or map and narrative clarification. Planning Commission recommendations are provided in Exhibit 2 of this Board letter.

In preparation of this Board letter, Planning Division staff identified 43 Planning Commission recommended revisions for Climate Action Plan goals, policies and programs which will be further analyzed in the General Plan Program EIR. Planning Division staff has also identified eight Planning Commission recommended revisions that require further consideration, discussion and direction from your Board. These are discussed below.

A. Conservation and Open Space Element

The Planning Commission recommended the incorporation of the Ojai Area Plan Policy Gas Collection, Use and Disposal (see draft General Plan – Ojai Area Plan Exhibit SR-16e) into the draft General Plan, Conservation and Open Space Element. The Planning Commission

recommended policy language (in legislative format below) and the legal implications of the Commission's recommended policy are discussed.

Policy COS-7.X Gas Collection, Use, and Disposal: The County shall require that gases emitted from all new oil and gas wells shall be collected and used or removed for sale or proper disposal, if feasible. Flaring or venting should only be allowed in cases of emergency or for testing purposes. [Source: Existing Ojai Valley Policy 1.3.2.2]

Omitting the term “if feasible” from this policy, as recommended by the Planning Commission, would prohibit all new oil and gas wells that would flare produced gas in non-testing and non-emergency situations, even in situations where no feasible alternative to flaring exists. It’s possible that some existing oil and gas operations cannot feasibly connect to gas collection pipelines, or otherwise feasibly collect or remove gas, and thus must flare produced gas in order to engage in oil production. This revised policy would prohibit the County’s approval of new oil and gas wells at such facilities.

Furthermore, the policy’s reference to all “new oil and gas wells”, without clarification, could be interpreted as prohibiting the County’s issuance of zoning clearances for new oil and gas wells that do not comply with the policy, even if such oil and gas wells are specifically described and authorized in an underlying conditional use permit that has already been approved by the County. Application of the policy to wells in this scenario could result in the impairment of a permittee’s vested rights.

Therefore, staff recommends your Board not include this policy. However, if your Board directs staff to include it, additional research regarding the feasibility of the policy, as proposed by the Planning Commission, would be required.

The Planning Commission also recommended revisions to Policy COS-8.5 as listed below:

Policy COS-8.5 Zero Net Energy and Zero Net Carbon Buildings: The County shall support State implement policy goals for transitioning to zero net energy and zero net carbon buildings, including updating the Building Code to include electrification of new buildings. (RDR) [Source: New Policy]

Public Works Agency (PWA) staff recommends your Board consider not revising Policy COS-8.5. The proposed policy would require updating the County’s Building Code to address the electrification of all new buildings. If your Board directs staff to include this program, additional research and analysis would be needed.

B. Public Facilities, Services and Infrastructure Element

The Planning Commission recommended the addition of a new policy within the Public Facilities, Services and Infrastructure Element’s section 5.4, Wastewater Treatment and Disposal. The recommended policy language is shown below in legislative format.

New Policy PFS-4.X Flood Control and Beach Sand Nourishment: The County shall include beach sand nourishment as an important factor in the design and maintenance of flood control facilities. [New Policy]

PWA staff recommends your Board consider not including this new policy due to the limited efficacy and cost implications of this policy. Further, PWA staff indicated that costs for implementation are anticipated to be significant.

C. Hazards and Safety Element

The Planning Commission recommended revisions to HAZ-1.6 are shown below in legislative format.

Policy HAZ-1.6 Post-Fire Community and Natural Resource Recovery: The County shall assemble an interagency team as needed to maintain response plans and coordinate the management of resources following wildfire events. This policy shall include promotion of the construction of homes that exceed the minimum required fire resistance, minimize climate change impacts, can be rapidly permitted, and would be much less likely to burn in a fire event. (PSR, IGC) [Source: New Policy]

Staff recommends that your Board consider not revising Policy HAZ-1.6, as the objective of the policy is to maintain County and interagency response plans and coordinate management of resources following wildfire events, rather than addressing construction and building standards. Your Board can direct staff to develop another policy that addresses these additional issues.

The Planning Commission also recommended revisions to Policy HAZ-10.11, Air Quality Assessment Guidelines, as stated below:

“In evaluating air quality impacts, the County shall consider total emissions from both stationary and mobile sources, as required by the California Environmental Quality Act. The County shall evaluate discretionary development for air quality impacts using the Air Quality Assessment Guidelines as adopted by the Ventura County Air Pollution Control District, except that emissions from APCD-permitted sources shall also be included in the analysis. The County shall revise the Initial Study Assessment Guidelines to implement this policy.”

While the Planning Division does not recommend any revisions to this Planning Commission-revised policy, it is important to provide context for the revisions and the Planning Division’s intended implementation of the revised policy, if approved by your Board. The Planning Commission’s revisions are based on a concern that under the Ventura County Air Pollution Control District’s (APCD) Air Quality Assessment Guidelines, emissions from APCD-permitted sources may not be disclosed and considered during environmental review conducted pursuant to the California Environmental Quality Act (CEQA). The Planning Division, working with the APCD, has in fact been disclosing and considering all such APCD-permitted emissions during the CEQA process in recent years, and intends to continue doing so even without this policy. If your Board approves this Planning Commission-recommended policy, the Planning Division will update the County’s Initial Study Assessment Guidelines (ISAGs) for consistency with the policy

and will also clarify in the ISAGs that the County considers APCD's permitting and regulatory program to constitute mitigation for air quality impacts under CEQA.

D. Circulation and Mobility Element

Policy CTM-1.1 Vehicle Miles Traveled (VMT) Standards and CEQA Evaluation

The Planning Commission recommended that thresholds of significance for Vehicle Miles Traveled (VMT) be added to this policy. By way of background, under a recently enacted state law, public agencies are now required to consider VMT when analyzing a project's impacts under CEQA. State law does not require VMT thresholds of significance be incorporated into general plans. The County's VMT thresholds of significance will consist of specific standards and methodologies for determining the significance of VMT-based traffic and circulation impacts for discretionary projects under CEQA. Such VMT thresholds of significance, which have yet to be developed, will be inserted into the County's ISAGs.

Planning Division staff recommends that your Board consider not integrating CEQA VMT thresholds of significance in the draft General Plan, as a change in CEQA thresholds would require a General Plan Amendment.

E. Appendix B: Climate Change

The Planning Commission recommended revisions to Program V of the CAP (Exhibit SR-19 Appendix B, Climate Change). Specifically, the Commission requested that the GHG inventory be updated annually, as opposed to every five years as currently proposed in the CAP.

Program V - Public Reporting on Greenhouse Gas (GHG) Strategy Progress: The County, under overall direction of the CEO, shall prepare public reports on the results of GHG Strategy implementation and monitoring and update greenhouse gas inventories and present these reports to the Board of Supervisors and the public annually. 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. [Source: New Program]

Staff discussed the cost and feasibility of proposed revisions to Program V with Ascent Environmental, the GPU project consultant responsible for preparation of the GHG inventory. Ascent has indicated that GHG inventory updates cost approximately \$100,000 to \$150,000 per update. Annual updates would not likely be feasible due to the limited availability and frequency of data needed for annual updates, the need to review changes in the GHG inventory as they relate to changes in state GHG reduction mandates, and the length of time it would take to generate an updated GHG inventory.

When considering the Commission's recommended revision to Program V to increase the frequency of GHG inventory updating, staff recommends your Board consider: (1) the 5-year increments starting in 2020 that would align with other five year intervals of state-mandated target dates in 2030 and 2045 as well the draft General Plan time horizon of 2040, and; (2) the additional costs of more frequent GHG inventory updates.

Based on the above considerations, staff recommends your Board retain the original draft General Plan GHG inventory updates to be completed every five years.

New Implementation Program – Budget and Staffing Plan for CAP Implementation

The Planning Commission also recommended a new implementation program for the CAP requiring a budget and staffing plan for CAP implementation (Exhibit SR-19 Appendix B: Climate Change). Specifically, the Commission requested that the program below be completed within six months of General Plan adoption.

Program X - 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.

Timeframe: Six months post adoption and then annual review.

Planning Division staff recommends that your Board consider the budget and staffing plan for CAP implementation prior to adoption of the General Plan. See Part Three, Board Direction on Key Policies and Programs, section B, 2040 General Plan Program and Policy Implementation, of this Board letter for additional discussion on CAP implementation and costs.

RECOMMENDED ACTION NO. 2 OF THIS BOARD LETTER

In addition to considering the above-stated specific issues, staff requests that your Board receive and consider the Planning Commission's recommended revisions to the draft General Plan (Exhibit 2) as well as Planning Division recommendations for Ojai Area Plan Policy 1.3.2.2, Policy COS-8.5, Policy PFS-4.X, Policy HAZ-1.6, Policy HAZ-10.11, Policy CTM-1.1, Conservation and Open Space Element Program V, and new Climate Action Plan Program Budget and Staffing, and direct Planning Division staff to revise the draft General Plan to incorporate such revisions as approved by your Board.

PART THREE - BOARD DIRECTION ON KEY POLICIES AND PROGRAMS

This section of the report draws your Board's attention to key policies and programs that require your Board's consideration.

A. 2040 General Plan Policy that has the Potential to Limit Development

In July 2019, and subsequent to Planning Commission Work Session No. 4, GPU project consultants completed a preliminary traffic growth forecast and Level of Service (LOS) modeling that will be used to inform the General Plan Program EIR. These results reflect baseline and future traffic volumes through 2040, based on Southern California Association of Governments

(SCAG) population projections, approved by your Board. The traffic model identifies county roadways that are currently, as well as predicted, to operate at unacceptable LOS standards prescribed in Policy CTM-1.5, Projects with Unacceptable Level of Service (LOS) in the Circulation, Transportation and Mobility Element. Policy CTM-1.5 prohibits discretionary development that will result in an unacceptable roadway LOS, which has the potential to limit the County's ability to achieve the Vision of the draft General Plan which encourages healthy, vibrant, and diverse communities to thrive. This policy was integrated from the existing General Plan (Policy 4.2.2.5) into the draft General Plan Circulation, Transportation and Mobility Element (CTM-1.5). Policy CTM-1.5 (1 through 3(a-e)) is set forth below:

Policy CTM-1.5 Projects with Unacceptable Level of Service (LOS)

1. *County General Plan land use designation changes and zone changes that would cause any cumulative unacceptable LOS as determined pursuant to Policies CTM-1.3 and CMT-1.4 shall be prohibited unless the Board of Supervisors imposes all feasible conditions of approval to address all unacceptable LOS effects and, after balancing, as applicable, the project's economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, against the project's unacceptable LOS effects, determines that the benefits of the project outweigh the project's unacceptable LOS effects.*
2. *County General Plan land use designation changes, zone changes, and discretionary development that would cause any individual (i.e., project-specific) unacceptable LOS effect as determined pursuant to Policies CTM-1.3 and CMT-1.4 shall be prohibited unless the project is conditioned to include a completion schedule and full funding commitment for road improvements which ensure that all unacceptable LOS effects will be eliminated within five years of project approval.*
3. *The following are exempt from this Policy:*
 - a. *Farmworker Housing Complexes, affordable housing development per Article 16 of the Non-Coastal Zoning Ordinance, and other housing exclusively for lower-income households, where such developments are served by roads that are currently operating at LOS "E" or better,*
 - b. *Additional dwellings and lots on Cultural Heritage Sites as permitted in the Non-Coastal Zoning Ordinance,*
 - c. *Agriculture and Agricultural Operations as permitted in the Coastal and Non-Coastal Zoning Ordinances, where such developments are served by roads that are currently operating at LOS "E" or better;*
 - d. *The unacceptable LOS exists on a city-maintained road or federal or state highway located within a city unless the applicable city has formally adopted and is implementing a general plan policy, ordinance, or a reciprocal traffic impact mitigation fee agreement with the County regarding development in the city that is intended to improve the LOS of County-maintained local roads and federal and state highways located within the unincorporated area of the county; and*

e. *If the LOS effects of a County-approved Specific/Area Plan are determined acceptable pursuant to Policies CTM-1.3 and CMT-1.4, the LOS effects of any subsequent development that is consistent with the approved Specific/Area Plan shall be exempt from this Policy. [Source: Existing GPP Policy 4.2.2.5, modified]*

The prohibitions in the above policy have current and long-term consequences for the County's ability to provide a diverse range of affordable housing, commercial and industrial businesses, and subdivision of land. This policy requires that for discretionary development that would create an unacceptable LOS standard, the project is prohibited unless the project is conditioned to include a completion schedule and a full funding commitment for road improvements that eliminate the unacceptable level of LOS within five years of project approval.

Planning Division and PWA Transportation Department staff recommend the following revisions to Policy CTM-1.5, which provide a pathway for future development that achieves the Vision of the draft General Plan.

Commercial, Industrial, Housing, Subdivision Implications

Based upon Policy CTM-1.5, current and future discretionary development that would exceed the acceptable LOS standards, are prohibited unless an applicant can pay for and complete road improvements within five years that maintain the acceptable LOS. Given the level of funding needed by an individual applicant to complete all road improvements required to be consistent with Policy CTM-1.5, this policy will likely limit and reduce future development for a range of commercial, industrial, housing (e.g. not considered affordable), and subdivision of land through 2040.

The below recommended revisions would provide a pathway for projects that exceed the acceptable LOS to pay a fee proportional to the project's fair share of unacceptable LOS effects, rather than the full funding requirement and completion of road improvements that maintain the acceptable LOS. This revised policy and program language would not apply to Area Plans that prohibit development unless an applicant can pay for and complete road improvements to maintain roadways at the prescribed levels noted in Area Plan policies. If your Board supports the following policy and program, staff will further refine as needed with County Counsel and the Public Works Agency.

Policy CTM-1.5 Projects with Unacceptable Level of Service (LOS)

2. County General Plan land use designation changes, zone changes, and discretionary development that would cause any individual (i.e., project-specific) unacceptable LOS effect as determined pursuant to Policies CTM-1.3 and CMT-1.4 shall be prohibited unless the improvements to the roadway and intersections are included in the Public Works Agency, Transportation Department Strategic Master Plan with a funding mechanism identified and the project is conditioned on the payment of a fee proportional to the project's fair share of unacceptable LOS effects.

Implementation Program CTM X

The County shall update the Traffic Impact Mitigation Fee Ordinance to include a fair share contribution funding mechanism for proposed improvements that allows applicants to pay a fee proportional to a project's fair share of unacceptable LOS effects, together with future projects contributing to LOS effects. Improvement costs shall be determined based upon the estimated trips generated by the project or some other method such as detailed engineering study to evaluate the projects LOS effects on the road improvements needed.

Timeframe: 2020 to 2025

Exemptions for Farmworker Complexes and Affordable Housing

Policy CTM-1.5 also includes an exemption for farmworker housing complexes and affordable housing projects. However, the exemption only applies to roadways operating at LOS "E" or better. If a roadway is operating at LOS "F," then the exemption does not apply, and such development is prohibited. Additional dwellings and lots located on cultural heritage sites are exempt from Policy CTM-1.5, regardless of the LOS of a roadway

The staff-recommended revisions below would support the development of farmworker housing complexes and housing exclusively for lower-income households by allowing such development on roadways operating at LOS "F." The exemption would not apply to Area Plan policies (e.g., Ojai Area Plan) that require roadways operating at LOS "E" or better.

Policy CTM-1.5 Projects with Unacceptable Level of Service (LOS)

3. The following are exempt from this Policy:

- a. Farmworker Housing Complexes ~~affordable housing development per Article 16 of the Non-Coastal Zoning Ordinance,~~ and other housing exclusively for lower-income households, ~~where such developments are served by roads that are currently operating at LOS "E" or better.~~ Affordable housing developments pursuant to Article 16 of the Non-Coastal Zoning Ordinance, where such developments are served by roads that are currently operating at LOS "E" or better.

In staff's proposed revisions to Policy CTM-1.5.3.b above no changes are proposed to the prescribed LOS acceptable level.

For the reasons noted above, Planning Division and PWA Transportation Department staff recommend your Board consider Policy CTM-1.5 Projects with Unacceptable Level of Service (LOS) policy and implementation program revisions that facilitate development of a diverse range of businesses and housing needed to implement the 2040 General Plan.

B. 2040 General Plan Program and Policy Implementation

The draft General Plan elements include proposed programs that will be used to implement the goals and policies of the General Plan (see Exhibits SR-5 through SR-20, Section Implementation Programs). Each program includes a general description of its purpose and implementation actions, responsible and supporting County agencies and departments, and implementation timing/schedule through 2040.

In certain cases, specifically for those policies and programs that are identified as mitigation measures in the final 2040 General Plan Program EIR, the County's failure to fully fund and/or implement these policies or programs could result in a legal challenge. For example, proposed CAP policies or programs that commit the County to lowering GHG to specific levels by taking specified actions by specified deadlines are legally binding and must be fully funded and timely implemented if, as is the current intent, these policies and programs are categorized as mitigation measures in the final 2040 General Plan Program EIR. In other words, in the case of the CAP, these policies and programs are not merely aspirational, but require concrete commitments of time and money by all affected County agencies and departments to timely implement.

The potential cost of policies and programs included in the CAP which exceed the requirements for compliance with state law would need to be further evaluated to determine time and cost commitments by the County. Therefore, staff will return to your Board with a project cost estimate for policy and program implementation of the CAP with the Public Review Draft 2040 General Plan.

C. Ventura County Public Health Department Recommended Revisions

In early July, after completion of Planning Commission Work Session No. 4, the Ventura County Public Health Department submitted several proposed policy and program revisions (Exhibit 8). In part, these proposed revisions address issues identified by the Public Health Alliance of Southern California. They address the health benefits of the urban forest, appropriate limits on alcohol and tobacco outlets, and investments in identified opportunity zones. All the proposed revisions are consistent with your Board's support of incorporating the "Health in All Policies Framework" into the General Plan. Consequently, Ventura County Public Health is requesting your Board consider the proposed recommended draft General Plan revisions at your work session today.

RECOMMENDED ACTION NO. 4 OF THIS BOARD LETTER

Staff recommends that your Board consider these revisions to the draft General Plan (Exhibit 8), and direct staff to revise the draft General Plan to incorporate such revisions as approved by your Board.

D. County Executive Office Comments

The County Executive Office (CEO) reviewed the draft General Plan and supports staff's recommended actions before your Board today. Further review and analysis by the CEO will be conducted upon release of the draft General Plan Program EIR. Concurrent with the development of the draft Program EIR, the CEO recommends that an estimate of costs related to the General Plan implementation programs be developed to help determine the financial impacts to the County.

RECOMMENDED ACTION NO. 5 OF THIS BOARD LETTER

Direct the County Executive Office to complete a fiscal analysis on the costs related to the draft General Plan implementation programs scheduled for the first five years (2020-2025) as part of the General Plan Update project.

PUBLIC COMMENTS

As discussed in the Background section of this Board letter, staff conducted a robust round of community engagement activities to secure input on the draft General Plan. Comments were received from members of the general public, focus group members, and Municipal Advisory Council members, from public comments received throughout these events, during Planning Commission Work Session No. 4, and through July 18, 2019 are included in Exhibits SR-1b, SR-2 through SR-4, SR-23 through SR-27, SR-29, SR-30, SR-32, SR-35, SR-36, SR-39, SR-40, SR-A through SR-H, and Exhibits 4 through 7 for your Board's consideration. In an effort to facilitate review of public comments, staff has compiled public comments, by element, which include revisions recommended by the public in legislative format for specific goals, policies and programs (Exhibit 3). Due to time constraints in preparing for this work session, Planning Division staff was only able to include comments received from the release of the draft General Plan in May 2019 through July 1, 2019 in Exhibit 3. Staff did not integrate general narrative from public comments as this task was too subjective or could misstate the public commenter.

On July 5, 2019, input from a June 15, 2019 meeting of the Ojai Valley Municipal Advisory Council (Exhibit 5) was submitted to Planning Division staff regarding discussion related to the County GPU project. Comments included a motion by the Ojai Valley Municipal Advisory Council to support "support the goals of CFROG and Climate Change 350 and to encourage the County to take their positions into account, to delete Policy HAZ 10:11, to recognize the oil industry in the General Plan and account for the true cost of oil and gas production in the county." The Municipal Advisory Council also supported making the General Plan Update more accessible.

On July 10, 2019, the Somis Municipal Advisory Council voted to submit comments from Mr. Pat Richards on requested questions and revisions to the draft General Plan to your Board for consideration (Exhibit 6).

On June 25, 2019, at the Open Space Roundtable, hosted by Supervisor Linda Parks, participants requested revisions to the draft General Plan to GPU staff in attendance at the meeting. These requested revisions have been provided to your Board for consideration (Exhibit 7).

On August 1, 2019, the California Department of Conservation, State Mining and Geology Board (SMGB) submitted a comment letter which includes several recommended revisions to the Conservation and Open Space Element of the draft General Plan for your Board's consideration. Planning Division staff recommends your Board incorporate the SMGB requested revisions which enhance the clarity of polices COS-6.2 Significant Mineral Resource Deposits, COS-6.4 Mineral Resource Area Protection, and COS-6.5 Mineral Resource Land Use Compatibility as set forth in Exhibit 11.

On August 2, 2019, the California State Department of Justice, Attorney General submitted a comment letter which includes recommended revisions to draft General Plan related to Senate Bill 1000 and Environmental Justice goals, policies and programs for your Board's consideration (Exhibit 12). Planning Division staff will review these comments to determine if additional refinement of the draft General Plan is required to comply with state law during the next milestone of the GPU work plan.

On July 30, 2019, the Department of the Navy, Naval Base Ventura County submitted a comment letter that includes recommended revisions to the draft General Plan related to military compatibility for your Board's consideration (Exhibit 13). Planning Division staff will review these comments and return to your Board with recommended revisions of the draft General Plan during the next milestone of the GPU work plan.

Following review of Exhibit 3, Public Recommended Revisions in Legislative Format Preliminary Public Review Draft 2040 General Plan, the Planning Division is recommending several revisions to the draft General Plan set forth in Exhibit 14 for your Board's consideration.

RECOMMENDED ACTION NO. 3 OF THIS BOARD LETTER

Staff recommends that your Board receive and consider public, focus group and advisory body comments and suggested revisions to the draft General Plan (Exhibits SR-5 through SR-20), and direct Planning Division staff to revise the draft General Plan to incorporate such revisions as approved by your Board.

NEXT STEPS

Based on direction from your Board at today's work session, staff will implement all recommended actions and begin drafting the Program EIR. Planning Division staff will return to your Board with the Public Review Draft 2040 General Plan and the draft Program EIR in spring 2020.

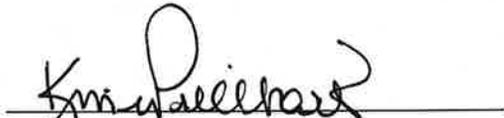
PUBLIC NOTICE

The Planning Division provided public notice regarding this work session by publishing a notice in the Ventura County Star, Mountain Enterprise and Ojai Valley News on July 26, 2019, and in the Vida Spanish language newspaper on July 25, 2019. In addition, staff sent a press release to 44 print and electronic media outlets, and staff sent notice via email to the General Plan email listserv (approximately 1,000 contacts), Chambers of Commerce throughout Ventura County,

Ventura County's ten incorporated cities, approximately 80 Public Information Officers throughout the county, homeowners' associations (HOAs) throughout the county, and to GPU focus group members and Technical Advisory Committee members. Staff also publicized this work session through the GPU project website and social media (Facebook, Twitter, and Instagram).

This letter was reviewed by the County Executive Office, the Auditor-Controller's Office, and County Counsel's Office. If you have any questions regarding this item, please contact me at (805) 654-2481, or Susan Curtis, General Plan Update Manager, at (805) 654-2497 or susan.curtis@ventura.org.


Dave Ward, Director
Ventura County Planning Division


Kim L. Prillhart, Director
Resource Management Agency

Exhibits

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| Exhibit 1a | Planning Commission Staff Reports June 6, 13, and 20, 2019, including staff report exhibits (shown below with prefix "SR") |
| SR Exhibit 1b | Casa Conejo Municipal Advisory Council Recommendation Letter (January 17, 2018) |
| SR Exhibit 2 | Preliminary Public Review Draft 2040 General Plan Community Open House Comments |
| SR Exhibit 3 | Summary Focus Groups Comments |
| | a. Transportation and Infrastructure Focus Group |
| | b. Open Space and Recreation Focus Group |
| | c. Climate Change Focus Group |
| | d. Economic Development Focus Group |
| | e. Agriculture Focus Group |
| | f. Water Focus Group |
| SR Exhibit 4 | Transportation and Infrastructure Focus Group Recommended Revisions |
| SR Exhibit 5 | Introduction |
| SR Exhibit 6 | Land Use and Community Character Element |
| SR Exhibit 7 | 2014-2021 Housing Element |
| SR Exhibit 8 | Housing Element |
| SR Exhibit 9 | Circulation, Transportation and Mobility Element |

SR Exhibit 10	Public Facilities, Services and Infrastructure Element
SR Exhibit 11	Conservation and Open Space Element
SR Exhibit 12	Hazards and Safety Element
SR Exhibit 13	Agriculture Element
SR Exhibit 14	Water Resources Element
SR Exhibit 15	Economic Vitality Element
SR Exhibit 16	Area Plans
	a. El Rio / Del Norte Area Plan
	b. Lake Sherwood / Hidden Valley Area Plan
	c. North Ventura Avenue Area Plan
	d. Oak Park Area Plan
	e. Ojai Valley Area Plan
	f. Piru Area Plan
	g. Thousand Oaks Area Plan
	h. Coastal Area Plan
	i. Saticoy Area Plan
SR Exhibit 17	Glossary
SR Exhibit 18	Appendix A: Area Plan and Existing Community Land Use Maps
SR Exhibit 19	Appendix B: Climate Change
SR Exhibit 20	Appendix C: SOAR (Save Open Space and Agricultural Resources) Ordinance
SR Exhibit 21	Current General Plan (2005) Annotated Version
SR Exhibit 22	Proposed 2040 General Plan SOAR Goal and Policy Minor Revisions
SR Exhibit 23	Additional Public Comments on the Public Review Draft of the 2040 General Plan (May 10, 2019 through May 30, 2019)
SR Exhibit 24	Public Comments Received Between 5-31-2019 to 6-3-2019
SR Exhibit 25	Public Comments Received Between 6-4-2019
SR Exhibit 26	Errata Memo dated 6-4-2019 Additional Public Comment Cards for Exhibit 2
SR Exhibit 27	Public Comments Received Between 6-5-2019
SR Exhibit 28	Powerpoint Presentation-Planning Commission Work Session No. 4, June 6, 2019

- SR Exhibit 29** Public Comments Received as of June 10, 2019
- SR Exhibit 30** Public Comments Received as of June 12, 2019
- SR Exhibit 31** Errata Memo dated June 12, 2019 Revisions to Conservation and Open Space Element
- SR Exhibit 32** Focus Group Recommended Revisions June 13, 2019
- SR Exhibit 33** Commission White's Powerpoint
- SR Exhibit 34** Preliminary Analysis 2014-2021 Housing Element Residential High-Density Zoned Sites
- SR Exhibit 35** Public Comments Received Through June 17, 2019
- SR Exhibit 36** Public Comments Received Through June 18, 2019
- SR Exhibit 37** Errata Memo dated 6-20-2019 Staff Report Revisions and Additional Housing Discussion
- SR Exhibit 38** Commissioner White PowerPoint for June 20, 2019
- SR Exhibit 39** Public Comments Received as of June 19, 2019
- SR Exhibit 40** Focus Group Recommended Revisions dated June 19, 2019
- SR Exhibit 41** Staff PowerPoint June 20, 2019
- SR Exhibit A** Public Comment Received from 350 Ventura County Climate Hub
- SR Exhibit B** Public Comment Todd Collart, June 12, 2019
- SR Exhibit C** Public Comments Received from Carol Holly and Kathy Lottes
- SR Exhibit D** Public Comment Received from Ben Werner
- SR Exhibit E** Public Comment Received June 20, 2019 from Ben Werner
- SR Exhibit F** Public Comment Received June 20, 2019 from Melinda Carmichael
- SR Exhibit G** Public Comment Received June 20, 2019 from LIUNA
- SR Exhibit H** Public Comment Received from Adam Vega
- Exhibit 2** Planning Commission Recommended Revisions to the Preliminary Public Review Draft 2040 General Plan
- Exhibit 3** Public Recommended Revisions in Legislative Format Preliminary Public Review Draft 2040 General Plan
- Exhibit 4** Public Comments Received June 20, 2019 to July 18, 2019
- Exhibit 5** Ojai Valley Municipal Advisory Comments, July 5, 2019
- Exhibit 6** Somis Municipal Advisory Comments, July 15, 2019

- Exhibit 7** Open Space Roundtable Recommended Revisions to draft General Plan, June 25, 2019
- Exhibit 8** VC Public Health Recommended Revisions to draft General Plan
- Exhibit 9** Planning Commission Work Session No. 4 Unofficial Minutes, June 6, 13, and 20, 2019
- Exhibit 10** Planning Division Memorandum, Revisions for Board Letter for August 6, 2019
- Exhibit 11** California Department of Conservation, State Mining and Geology Board letter, August 1, 2019
- Exhibit 12** California State Department of Justice, Attorney General letter, August 2, 2019
- Exhibit 13** Naval Base Ventura County letter, July 30, 2019
- Exhibit 14** Planning Division Recommended Revisions to the Preliminary Public Review Draft 2040 General Plan.