

Public Comments Received

#	Commenter	Organization <i>If applicable</i>	Date of Correspondence
1	City of Moorpark		August 16, 2019
2	Marie Lakin	CFROG	September 4, 2019
3	Kate Faulkner		August 14, 2019
4	Marie Lakin	CFROG	September 4, 2019
5	Marie Lakin	CFROG	September 7, 2019
6	Dr. Steven Colome		September 8, 2019
7	John Brooks		September 8, 2019
8	Chris Tull	Earth Justine, 350 VC Climate Hub, Sierra Club	September 9, 2019
9	Mary Olson		September 9, 2019
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AUG 19 2019



CITY OF MOORPARK

COMMUNITY DEVELOPMENT DEPARTMENT | 799 Moorpark Avenue, Moorpark, California 93021
Main City Phone Number (805) 517-6200 | Fax (805) 532-2540 | www.moorparkca.gov

August 16, 2019

Susan Curtis, General Plan Update Manager
County of Ventura, Planning Division
800 South Victoria Avenue
Ventura, CA 93009

Subject: Resubmittal of Comments Regarding the Draft 2040 General Plan

Mrs. Curtis,

Thank you for providing the opportunity to comment regarding the County of Ventura's Draft 2040 General Plan. It is exciting to see the culmination of this multi-year effort on the horizon and we appreciate the manner in which your staff has engaged the public and partner agencies in this effort.

The City of Moorpark previously provided comments on July 3, 2015 (attached) regarding a desire to have certain regional roadway improvements acknowledged as priorities in the Circulation Element. These items do not appear to be included, either directly or indirectly, as priorities in the current draft. Our City Council has identified traffic improvements as a strategic priority. We are therefore resubmitting our request that the following projects are identified within the goals and policies of the Circulation Element:

- Improvements to Grimes Canyon Road, including the realignment of Hitch Boulevard at Los Angeles Avenue; and
- Construction of the Broadway Road connection to the State Route 23 bypass, as outlined in the 2009 Ventura County Congestion Management Plan.

Our City Council has identified that traffic and congestion improvements are a strategic priority for the City. The inclusion of these items in the General Plan Circulation Element demonstrates a commitment to these improvements and maintains a focus on their completion. These projects will relieve regional traffic and congestion issues, including those within the City of Moorpark.

Please feel free to contact me at (805) 517-6251 or Dspondello@moorparkca.gov if you would like to discuss this further.

Regards,

A handwritten signature in blue ink, appearing to be 'DS', is located below the 'Regards,' text.

Douglas Spondello
Planning Manager

Attachment:

July 3, 2015 Letter to Board of Supervisors

CC:

Troy Brown, City Manager
Karen Vaughn, AICP, Community Development Director
Sean Corrigan, City Engineer/Public Works Director



CITY OF MOORPARK

JUL 06 2015

COMMUNITY DEVELOPMENT DEPARTMENT | 799 Moorpark Avenue, Moorpark, California 93021
Main City Phone Number (805) 517-6200 | Fax (805) 532-2540 | www.moorparkca.gov

July 3, 2015

Board of Supervisors
County of Ventura
800 S. Victoria
Ventura, CA 93009

Planning Commission
County of Ventura
800 S. Victoria
Ventura, CA 93009

Subject: July 7, 2015 Joint Study Session of the Board of Supervisors and Planning Commission to Receive and File a Presentation Regarding the Progress to Date on the Preliminary Work Tasks for the General Plan Update Work Program; and for the Board of Supervisors to Provide Direction to Staff

Thank you for the opportunity to provide early input on the County's General Plan Update Work Program. The City of Moorpark anticipates working with the County in a collaborative effort on this program.

Moorpark specifically requests that consideration be given in the County General Plan Circulation Element to the following regional roadway improvements:

- Grimes Canyon Road, including Realignment of Hitch Boulevard at Los Angeles Avenue.
- Broadway Road Connection to SR 23 bypass, consistent with the 2009 Ventura County Congestion Management Program. The easterly extension of Broadway Road was included in a previous version of the County Circulation Element.

Please feel free to contact me at (805) 517-6226 for any further discussion.

Best Regards,



Joseph Fiss
Planning Manager

C: Steven Kueny, City Manager
David A. Bobardt, Community Development Director
Dave Klotzle, City Engineer/Public Works Director

County of Ventura
Board of Supervisors/Planning Commission
Joint Study Session
Ventura County General Plan Update Report
Exhibit "A" – City of Moorpark Letter

JANICE S. PARVIN
Mayor

ROSEANN MIKOS, Ph.D.
Councilmember

KEITH F. MILLHOUSE
Councilmember

DAVID POLLOCK
Councilmember

MARK VAN DAM
Councilmember

Downing, Clay

From: Kate Faulkner <kerfaulkner@gmail.com>
Sent: Wednesday, August 14, 2019 12:57 PM
To: Downing, Clay
Cc: Bennett, Steve
Subject: Ventura County has already warmed 2.6 degrees C
Attachments: Image-1.jpg

Hello Clay,

I came across the attached graph in the Washington Post which indicates that Ventura County has warmed significantly faster than the overall U.S. since the 1890s. Climate change is a major cause of our warming (particularly looking at the average temps in recent years). Development is probably another major contributor to local warming, as compared to the rest of the U.S..

The draft General Plan forecasts climate change as an issue of the future; as opposed to a current challenge. Of course, current problems (fires, loss of woodlands, decreased surface water, coastal erosion, sea level rise, declining marine life, insect-borne diseases, crop losses, ground water mining, etc.) are manifestations of the existing climate change impacts which have been long in the making and will continue to grow in spite of what we do (but, quick and effective action is our only option, our only alternative, and our only hope).

I suggest that the General Plan would be strengthened by analyzing current problems in Ventura County created, or exacerbated, by climate change. This will create a much better foundation for supporting meaningful policies and actions.

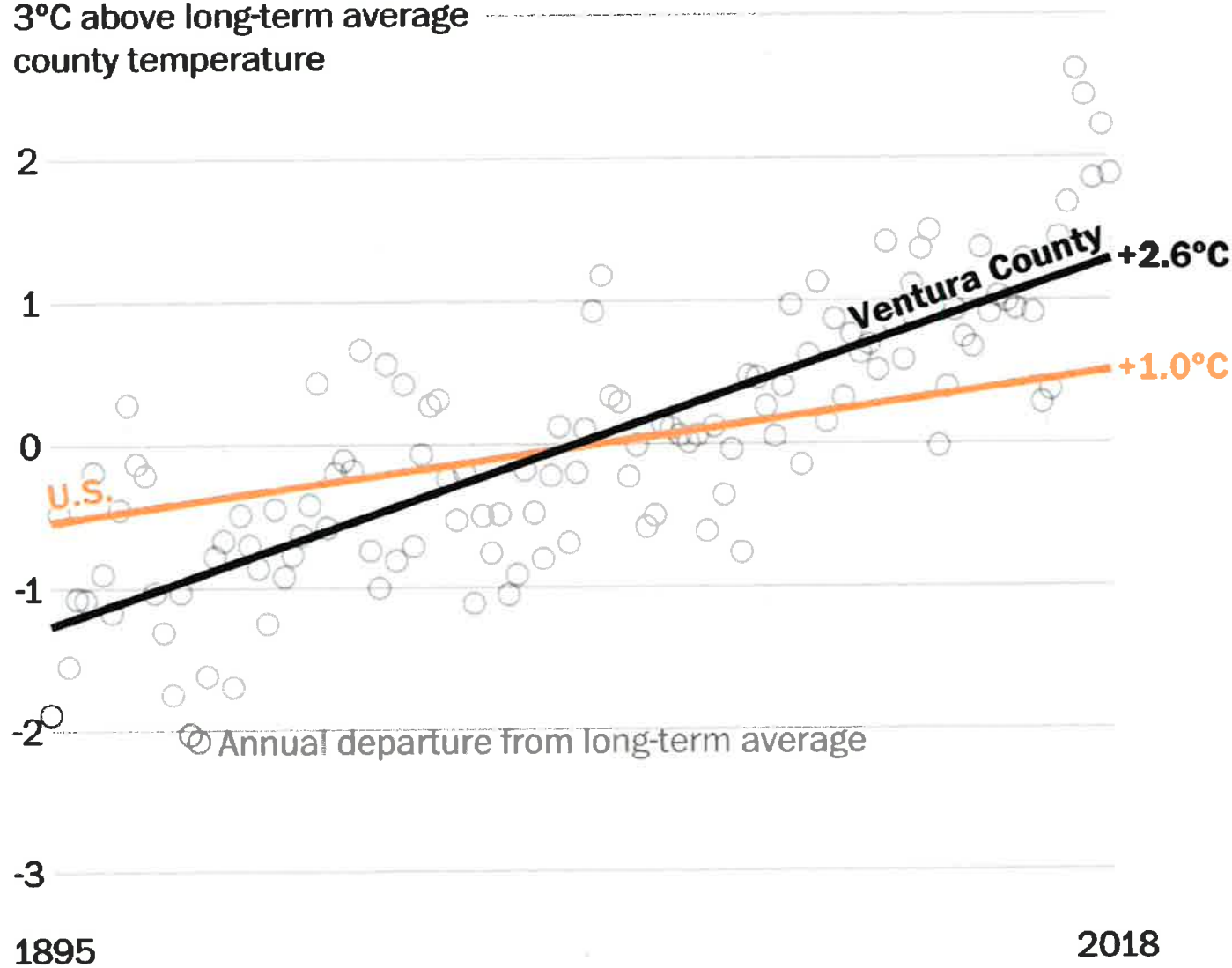
Take care,
Kate Faulkner

Ventura County, California

+2.6° Celsius

Annual temperature change, 1895-2018

3°C above long-term average
county temperature



From: CFROG Executive Director <ed@cfrog.org>
Sent: Wednesday, September 4, 2019 1:23 PM
To: Prillhart, Kim; Curtis, Susan
Cc: Bennett, Steve; Parks, Linda; Offerman, Steve
Subject: Timeline for Sept. 10 General Plan item

CAUTION: If this email looks suspicious, DO NOT click. Forward to
Spam.Manager@ventura.org

Dear Ms. Prillhart and Ms. Curtis,
cc: Supervisors Steve Bennett, Linda Parks
Steve Offerman

As close followers and commenters on the General Plan Update, we want to thank you for your prior and good notice about the upcoming workshops and meetings which have been scheduled for public input.

We were therefore surprised to see late notice come up just before the holiday weekend of another agenda item on Sept. 10. It appears you will be consolidating directives from several planning commission meetings and a day-long Board workshop and presenting them for comment once again. The notice has also alluded to an unknown policy reconsideration.

We understand we will see the Board letter for this proposal tomorrow some time. This will give those who closely follow these proceedings little time to research hours of testimony in order for their comments to be placed in the official record. Since other meetings have had such ample notice, we are perplexed about the short turnaround for this one.

We do realize that most Board items are noticed in this manner, but we believe that a General Plan document should have broader and longer notice as this is a community document meant for greater public input and scrutiny. Our wish is for the pertinent information to be distributed in a more timely manner in the future.

Best,

Marie Lakin
Executive Director
Climate First: Replacing Oil & Gas
(805) 243-8093

www.CFROG.org





P.O. Box 114 • Ojai, CA 93024

Email: ed@CFROG.org

Phone: (805) 794-0282

www.cfrog.org

September 7, 2019

Ventura County Board of Supervisors
800 S. Victoria Ave.
Ventura, CA 93009

Dear Chair Bennett and Supervisors,

Climate First: Replacing Oil & Gas (CFROG) joins with the City of Ojai, Ojai Valley Defense Fund and the Ojai Valley Municipal Advisory Council in asking your board not to reconsider Draft General Plan Policy HAZ-10.11. This contradicts important legal protections for air quality in the Ojai Valley won by CFROG in a lawsuit in November of 2017 (CFROG v. County of Ventura, Mirada Petroleum).

The decision was not appealed and is therefore controlling law in Ventura County.

Please note our attorney's three precise arguments on this issue and our proposed language for HAZ 10.11 going forward:

Excerpts from Shute/Mihaly Comment letter on the General Plan Update, June 5, 2019.

II. Ojai Valley Area Plan

A. The Ojai Valley Area Plan Properly Retains a Stringent Air Quality Threshold — and the General Plan Must Ensure Its Lawful Application.

CFROG strongly supports the retention of existing Ojai Valley Policy 1.1.2.1 (as Policy OJ-55.1) in the Preliminary Draft. Prelim. Draft at OJ-36 (Goal OJ-55; Policy OJ-55.1). Under Policy OJ-55.1, the County "shall find discretionary development in the Ojai Valley to have a significant adverse impact on the regional air quality if daily emissions would be greater than 5 pounds per day of Reactive Organic Compounds (ROC) and/or greater than 5 pounds per day of Nitrogen Oxides (NOx)." However, as discussed further below, both the County and the Ventura County Air Pollution Control District ("APCD") have applied this policy in a manner that unlawfully precludes meaningful environmental review and mitigation of air quality impacts under the California Environmental Quality Act ("CEQA"). Accordingly, CFROG recommends that the General Plan be revised to confirm that the policy establishes an enforceable, stand-alone threshold.

CEQA defines a "threshold of significance" as "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant." CEQA Guidelines § 15064.7(a).6 Policy OJ-55.1 establishes

a quantitative threshold above which air pollution impacts of development are considered significant, and thus functions as a threshold of significance.

The County, however, has not always applied the threshold in accordance with its plain meaning.

Rather, the County has relied on Air Quality Assessment Guidelines adopted by the APCD ("APCD Guidelines"). See Ventura County Initial Study Assessment Guidelines at 7 ("all County agencies, departments and special districts shall utilize the air quality assessment guidelines as adopted and periodically updated by the Ventura County Air Pollution Control District (APCD)"); Prelim. Draft at 7-27 (Policy HAZ-10.11) (requiring that "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").

The APCD Guidelines, in turn, apply thresholds of significance only after first subtracting emissions from all APCD-permitted sources from total project emissions. In other words, only emissions from non-permitted sources are counted toward the threshold, while emissions from permitted sources that are part of the same project are ignored. For example, the APCD Guidelines establish thresholds for reactive organic compounds (ROC) and nitrogen oxides (NOx), which react in the atmosphere to form ozone. APCD Guidelines at 3-2 (5 lbs/day for the Ojai Planning Area and 25 lbs/day for the rest of Ventura County). Yet the APCD Guidelines also provide that any emissions from equipment "required to have a Ventura County APCD Permit to operate need not be considered" and "should be subtracted from total project emissions before making a determination as to whether or not the project will have an adverse impact on air quality."

APCD Guidelines at 5-4; see also id. at 1-1 to 1-2 (describing APCD permit system as "separate from CEQA" and noting that "the emissions from equipment or operations requiring APCD permits are not counted towards the air quality significance thresholds").

The "CEQA Guidelines" are codified at title 14, California Code of Regulations, section 15000 et seq. As a result, emissions of air pollutants subject to APCD permitting never count toward CEQA significance.

The APCD Guidelines' approach is unlawful for at least three reasons:

First, the APCD Guidelines violate the basic CEQA principle that agencies must analyze a project as an integrated whole, not separate it into smaller pieces so as to evade environmental review. CEQA clearly prohibits "segmentation" or "piecemealing" of a project's impacts. See *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonoma* (2007) 155 Cal.App.4th 1214, 1229 ("when one activity is an integral part of another activity, the combined activities are within the scope of the same CEQA project" and must be analyzed together); Guidelines § 15378(a) ("Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.").

Agencies cannot avoid environmental review by breaking a project into smaller subprojects with correspondingly lesser impacts. See, e.g., *Bozung v. Local Agency Formation Comm'n* (1975) 13 Cal.3d 263, 283-84 (CEQA mandates that "environmental considerations do not become submerged by chopping a large project into many little ones"). Yet this is exactly what the APCD Guidelines do by treating the APCD's "permit system" as "separate from CEQA." APCD Guidelines at 1-2. An oil and gas project consisting of several potential emissions sources must be evaluated as a single, integrated project, not "chopp[ed] up" into individual sources — some requiring APCD permits and others not — for the purpose of evading CEQA review.

Second, the APCD Guidelines violate Supreme Court precedent holding that air pollutant emissions from a project must be compared to the physical environment as it exists at the time of environmental analysis, not to hypothetical conditions such as those embodied in air permit limits. See *Comm-*

nities for a Better Environment v. South Coast Air Quality Management District (2007) 48 Cal.4th 310; CEQA Guidelines § 15125(a).

By subtracting all permitted emissions from a project's total emissions before applying the threshold of significance, the APCD Guidelines effectively compare project emissions to maximum permitted levels rather than to existing physical conditions — exactly what the Supreme Court in *Communities for a Better Environment* held agencies cannot do. See 48 Cal.4th at 320-27.

Third, the approach outlined in the APCD Guidelines violates a court order. In November 2017, the Ventura County Superior Court found that the 5 lbs/day threshold in the Ojai Valley Area Plan means what it says and must be applied without subtracting emissions from oil and gas equipment permitted by the APCD. The Court concluded that “the blanket VCAPCD exemption rule for all oil and gas project emissions effectively avoids setting any standard of significance” and thus “is an abdication of the lead agency’s responsibility ... to consider and inform the public as to project-related health risks” and steps taken to mitigate those risks. Order on Amended Petition for Writ of Mandate, *Citizens for Responsible Oil & Gas v. County of Ventura*, No. 56-2016-00484423-CU-MN-OXN (Ventura Super. Ct. Nov. 14, 2017) at 21.

The Court further found that the APCD’s approach contravened both CEQA’s information-disclosure requirements and its mandate that planning and review by multiple agencies be conducted in an integrated, concurrent manner. Id. at 22-24 (citing *Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918, 935-36).

The Court concluded that the County “failed to proceed in the manner required by law by refusing to deem the project’s proposed increases from baseline emissions as significant in direct contravention of its own thresholds of significance” under the Ojai Valley Area Plan. Order at 30-31.

In reviewing subsequent projects, County staff have refused to comply with the Court’s order. Rather, County staff have argued that the original version of the APCD Guidelines was adopted in 1989, before adoption of the Ojai Valley Area Plan in 1995, and have concluded on that basis that the Ojai Valley Area Plan always anticipated that permitted emissions would be subtracted from the threshold. But even if County staff’s historical argument were correct — which CFROG does not concede — the Superior Court’s judgment is still binding on the County, and the APCD Guidelines would still be unlawful under CEQA for the reasons discussed above.

The direct refusal of County staff to comply with a court order is disturbing. It also exposes the County to significant litigation risk. In order to ensure compliance with the law (and reduce the risk of losing another lawsuit), the General Plan should make clear — as CEQA requires — that the thresholds apply to all emissions from a project, whether subject to APCD permitting or not.

Accordingly, CFROG recommends the following revisions:

Revise Goal OJ-37 as follows:

The County shall find discretionary development in the Ojai Valley to have a significant adverse impact on the regional air quality if total daily emissions from the development as a whole (including sources subject to Ventura County Air Pollution Control District permitting requirements) would be greater than 5 pounds per day of Reactive Organic Compounds (ROC) and/or greater than 5 pounds per day of Nitrogen Oxides (NOx).

Finally, please be aware of Judge Reiser’s written opinion in *CFROG v. County of Ventura, Mirada Petroleum*:

“... the blanket VCAPCD exemption rule for all oil and gas project emissions effectively avoids setting any standard of significance simply because the application involves oil and gas emissions, relying instead upon the ministerial permitting practices of VCAPCD to provide required mitigation. This protocol, while expedient because it sidesteps project-specific CEQA mitigation and alternatives analysis on oil and gas permits, is ***an abdication of the lead agency’s responsibility*** in the environmental document to consider and inform the public as to project-related health risks, and the steps being taken, if any, to mitigate those risks.”

We ask that you not overturn the Planning Commission’s thoughtful revisions which follow existing case law.

Sincerely,

Marie Lakin, Executive Director,
Climate First: Replacing Oil & Gas.

Ventura County Board of Supervisors:
Agenda Item #32
Reconsideration of Draft General Plan Policy HAZ-10.11

Statement of Dr. Steven Colomé,
September 8, 2019

I recommend in the strongest terms that the BOS reject staff's request to reconsider Draft General Plan Policy HAZ-10.11. The policy was revised for clarity and consistency with law and science and should remain as amended in the Draft General Plan and approved by PC and BOS.

One should ask what the real reasons behind staff request are—it cannot be because “the revised policy is ambiguous and unclear” as claimed in the staff report.

So what is HAZ-10.11? This policy memorializes the “Ventura County Air Quality Assessment Guidelines” developed by your APCD.¹ In the world of air pollution regulation, guidelines do not even achieve the level of relevance of a rule---they are just that, guidelines.

In the past, County staff have used this document to attempt to justify zeroing out real emissions from consideration of discretionary permitting when the project receives ministerial approval by the APCD. This has been found to be an illegal circumvention of CEQA.

The staff argue that “the County considers the APCD’s permitting and regulatory program to constitute mitigation for air quality impacts under CEQA”. That is incorrect.

It is true that the mission of the APCD is to work toward meeting state and federal air quality standards and that their permitting activity is designed to do just that. Permitted emissions, including offsets, are designed to bring the county into compliance with those standards.

However, review under CEQA requires a consideration and understanding of the total impacts of a project on the affected community and environment. That would include emissions receiving ministerial APCD permits.

¹ <http://www.vcapcd.org/pubs/Planning/VCAQGuidelines.pdf>

We have increasingly recognized in this state that industrial emissions can have unacceptable health impacts on the surrounding communities, and often disproportionately so for disadvantaged groups. That is exactly why AB617 was passed by the State Legislature in 2017.² This legislation was adopted as a companion to the Cap-and-Trade Program for greenhouse gas emissions. Under that program companies could purchase offsets in far-flung places like Alaska or Brazil while continuing to emit pollutants in California communities.

AB617 is designed to right that wrong by focusing on better understanding and reduction of impacts on the affected communities.

Similarly, while APCD may require best available controls on an industrial source, or allow offsets to be purchased elsewhere in the County, the residents around the project are impacted.

Those impacts, in their totality must be considered in discretionary permitting.

The currently approved Draft General Plan Policy HAZ-10.11, as amended is clear on those points.

The BOS should firmly reject the staff request on this policy.

² https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB617

From: John Brooks <jbrooksnp@gmail.com>
Sent: Sunday, September 08, 2019 9:07 PM
To: ClerkoftheBoard, ClerkoftheBoard
Subject: General Plan Comments

Dear Supervisors,

Please keep the policy called HAZ-10.11 in the draft General Plan:

“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 General Plan Update Board of Supervisors Hearing shall revise the Initial Study Assessment Guides to implement this policy.”

In addition, I would like to echo the recommendation from the Surfrider Foundation to account for extreme sea level rise scenarios when planning for infrastructure. This is the prudent conservative choice.

Respectfully, John Brooks (Newbury Park)



Re: Earthjustice, Sierra Club, and VC Climate Hub's Comments on the Inclusion of Building Electrification Policies in the Draft 2040 General Plan Recommended Revisions from the August 6, 2019 Board of Supervisors Work Session

On June 3, 2019 comments were submitted via email by EarthJustice, Sierra Club, and Ventura County Climate Hub regarding the inclusion of building electrification policies in the general plan update (see Appendix). We are very pleased to see the revisions to items 56 and 57 from the August 6 work session, and we thank you for considering these policies.

That said, we don't believe that the currently proposed revisions meet the required level of urgency and specificity required to rapidly reduce the County's greenhouse gas (GHG) emissions in line with the goals of the state of California. Please see below for proposed revisions to items 56 and 57.

Line 56

[Cos-8.5] The County shall support the transition to zero net energy and zero net carbon buildings, ~~including electrification of new buildings~~ and will prepare ordinances requiring new construction to be 100% electric-powered with no gas hookups. (RDR) [Source: New Policy]

Line 57

[New Program] The County shall encourage community members to conserve energy and reduce greenhouse gas emissions and increase awareness about energy efficiency and conservation and climate change, to conduct targeted outreach to homeowners and contractors to encourage installation of electric appliances upon routine replacement of natural gas appliances and heaters and provide information regarding financial incentives. Additionally, the County shall prepare ordinances to require fuel switching from natural-gas appliances to electric appliances when existing buildings undergo substantial renovation or expansion. (SO, PI)

Appendix

*Previous Comments submitted via email
June 3, 2019*





Re: Earthjustice, Sierra Club, and VC Climate Hub's Comments on the Inclusion of Building Electrification Policies in Climate Action Plans as Mitigation Measures for the Greenhouse Gas and Energy Impacts of a General Plan under the California Environmental Quality Act.

Earthjustice, Sierra Club, and VC Climate Hub submit the following comments on the Draft Climate Action Plan ("CAP") for the County of Ventura. While there are many elements to a successful CAP, including use of transit-oriented, mixed use development to minimize car trips, increased use of renewable energy, and policies to facilitate adoption of electric vehicles, these comments focus on the importance of building electrification. Direct emissions from fossil fuel combustion in buildings, such as from gas-powered space and water heating, accounts for approximately ten percent of California's total greenhouse gas ("GHG") emissions.¹ Switching to efficient electric options results in substantial GHG reductions today, and increased reductions over time as California relies on increasing levels of renewable energy. Because new construction projects, existing building retrofits, and appliance replacements lock-in energy system appliances for decades, decisions that result in new and continued fossil fuel use today will make it more difficult to meet future GHG reduction requirements. Accordingly, now is the time for to incorporate meaningful building electrification measure into the CAP.

Through its jurisdiction over land use, building permits, and interactions with contractors and residents, local governments have a key role to play in facilitating building electrification. We recognize that the preliminary draft CAP makes some attempts to address electrification in the building sector. Items COS-M and COS-P both mention reach codes but seem to focus on energy efficiency or building preservation rather than electrification of appliances. Item HAZ-10.5 specifically mentions that the county "... shall work with applicants for discretionary development projects to incorporate... electric appliances and equipment ..." but this language fails to set any deadlines or mandates and is not sufficient to match the scale of the challenge of building electrification. Meaningful action must begin now. Pursuant to the requirements of a CAP under the California Environmental Quality Act ("CEQA"), these comments recommend a methodology for determining the significance of community-wide GHG impacts under the CAP, set forth goals and policies that should be adopted to support building electrification, and highlight the safety, public health, and economic benefits resulting from widespread building electrification. It is our hope these comments will help realize our shared vision of meaningful reductions in GHG pollution and more healthy and sustainable communities.

¹ California Energy Commission, Final 2018 Integrated Energy Policy Report Update, Volume II, at 18 (Jan. 28, 2019) ("Final 2018 IEPR Update"), https://www.energy.ca.gov/2018_energy_policy/documents/.

I. Determining the Significance of Community-Wide Emissions.

CEQA Guideline § 15183.5(b)(1)(B) provides that a CAP should “[e]stablish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable.” In determining the significance of project impacts, a lead agency “must ensure that CEQA analysis stays in step with evolving scientific knowledge and state regulatory schemes.” *Cleveland National Forest Foundation v. San Diego Assn. of Gov’ts* (2017) 3 Cal.5th 497, 519.

One approach for determining significance of community GHG impacts is the use of a per-capita metric that looks at total community-wide emissions on a per capita basis when factoring in both the number of residents and employees (collectively “service population” or SP). In examining this approach, the Bay Area Air Quality Management District (“BAAQMD”) used statewide numbers to set a 2020 per capita emissions threshold when considering all sources of state emissions of 6.6 Metric tons (“MT”) CO₂e/SP and 4.6 MT CO₂e/SP for the land use sector.² This threshold was based on AB 32’s target of reducing GHG emissions to 1990 levels by 2020. Importantly, “using a statewide criterion requires substantial evidence and reasoned explanation to close the analytical gap left by the assumption that the ‘level of effort required in one [statewide] context . . . will suffice in the other.’” *Golden Door Properties LLC v. County of San Diego* (2018) 27 Cal.App.5th 892, 904 (quoting *Center for Biological Diversity*, 62 Cal.4th at 227). To the extent the community emissions under the CAP are reflective of statewide emission sources and include a mix of industrial, commercial and residential development, and potential agricultural sources, use of the statewide 2020 target of 6.6 MT CO₂e/SP would likely be appropriate. For communities that are largely comprised of commercial and residential development, the 4.6 MT CO₂e/SP should be used.

As a long range plan, the CAP should determine significance based on Senate Bill 32’s requirement to reduce GHGs to 40 percent below 1990 levels by 2030 and California’s goal under Executive Order B-55-18 of achieving carbon neutrality by no later than 2045. Scaling the 2020 4.6 MT CO₂e/SP to meet the 2030 requirement of reducing GHGs to 40 percent below 1990 levels yields a threshold of 3.2 MT CO₂e/SP.³ By 2045, the threshold should be net-zero.

In addition to GHG emissions, a key purpose of the evaluation of energy impacts under CEQA is “decreasing reliance on fossil fuels, such as coal, natural gas and oil.”⁴ Addressing energy impacts of proposed projects requires more than mere compliance with Title 24 Building Energy Efficiency Standards.⁵ Including gas hook-ups in new projects, and thereby perpetuating reliance on fossil fuels, is contrary to California’s energy objectives and should be considered a

² See BAAQMD, *CEQA Guidelines Update, Proposed Thresholds of Significance* at 4-5 (Dec 7, 2009), <http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/proposed-thresholds-of-significance-dec-7-09.pdf?la=en> (explaining methodology for project-level GHG threshold).

³ Using 190.7 MMTCO₂e for land use sector under Air Resources Board 2017 Climate Change Scoping Plan Update and 2030 service population of 60.39 million under California Board of Finance and Caltrans projections.

⁴ CEQA Guidelines, Appendix F, Sec. I.

⁵ See *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 211.

significant impact under CEQA. As the California Energy Commission (“CEC”) stated in its recent Integrated Energy Policy Report (“IEPR”):

New construction projects, retrofitting existing buildings, and replacing appliances and other energy-consuming equipment essentially lock in energy system infrastructure for many years. As a result, each new opportunity for truly impactful investment in energy efficiency and fuel choice is precious. If the decisions made for new buildings result in new and continued fossil fuel use, it will be that much more difficult for California to meet its GHG emission reduction goals. Parties planning new construction have the opportunity instead to lock in a zero- or low-carbon emission outcome that will persist for decades⁶

Including gas hook-ups in new projects, and thereby perpetuating reliance on fossil fuels, is contrary to California’s energy objectives and decarbonization trajectory and should be considered a significant energy impact under CEQA. Because efficient, all-electric buildings do not require a gas hook-up and therefore do not lock-in additional fossil fuel infrastructure, they avoid this significant energy impact.

II. A Range of Feasible Mitigation Measures Should be Incorporated into a Climate Action Plan to Facilitate Building Electrification and Mitigation Community Greenhouse Gas and Energy Impacts.

CEQA Guideline § 15183.5(b)(1)(D) states that a CAP should “[s]pecify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.” Notably, “[q]uantifying GHG reduction measures is not synonymous with implementing them.”⁷ Accordingly, while a mitigation that quantifies benefits from certain measures such as increased renewable procurement is a start, these measures must be backed with timelines for implementation, identified funding streams where applicable, and specific performance standards to provide the requisite assurance that claimed reductions will be realized. Where proposed mitigation is unfunded, does not have a defined timeline for adoption, or is simply a suggestion lacking any requirement of compliance, it cannot be relied upon to support achievement of CAP’s GHG emission reduction targets.⁸ Particularly where there is no evidence “to support its belief that people will participate” in various voluntary programs, a CAP will not survive legal scrutiny.⁹ Accordingly, building electrification and other greenhouse gas mitigation measures should be “coupled with specific and mandatory performance standards to ensure that the measures, as implemented, will be effective.”¹⁰

⁶ CEC, 2018 Integrated Energy Policy Report Update, Vol. II at 18 (Jan. 2019), <https://efiling.energy.ca.gov/getdocument.aspx?tn=226392>

⁷ *Sierra Club v. County of San Diego*, 231 Cal.App.4th 1152, 1170 (2014).

⁸ *Id.* at 1168-69.

⁹ *Id.* at 1170.

¹⁰ *Communities for a Better Env’t v. City of Richmond*, 184 Cal.App.4th 70, 94 (2010).

With choices over appliances and permitting happening at the local level, there is a range of actions for local governments to take to ensure their communities transition away from fossil fuel combustion in their buildings. We recommend the CAP include a specific goal of eliminating gas combustion in buildings by 2045 and adopt a range of feasible measures to put the County on a path to achieve this objective.

1. Set a Goal of Reducing GHG Emissions from Building to 40 Percent Below 1990 Levels by 2030 and Eliminating Building Emissions by 2045.

The CAP should set the following overarching goal:

Goal: *Reduce GHG emissions from buildings by 40 percent below 1990 levels by 2030 and eliminate building emissions by 2045 through widespread building electrification.*

Setting a target for building electrification provides much needed clarity for builders, appliance manufacturers, HVAC installers, contractors, and others to prepare for and support the transition from gas to clean electricity. Just as regulatory and local agencies have adopted procurement targets for zero-emission vehicles, renewable energy, and energy storage, establishing similar goals for zero-emission appliances like electric heat pumps and induction stoves can help rally key market actors to offer the technologies, services, financing, and innovative programs needed to successfully decarbonize the buildings sector.

Local governments are already beginning to establish electrification targets in line with their climate goals. For example, in February 2018, the Los Angeles City Council directed their municipal utility Los Angeles Department of Water and Power and the Department of Building and Safety to set building electrification targets and strategies.¹¹ A target of at least 40 percent below 1990 GHG emission levels by 2030 aligns with the statewide emissions reduction target under Senate Bill 32. Eliminating building emissions by 2045 aligns with California's 2045 statewide carbon neutrality goal set forth in Executive Order B-55-018 and 100 percent carbon-free electricity under Senate Bill 100.

To achieve these targets, the CAP should also set targets for market share of underlying electric technologies such as:

- Increase the share of high-efficiency heat pumps for space heating from 5% sales in 2018, to 50% in 2025, and 100% in 2030
- Increase the share of high-efficiency heat pumps for water heating from 1% sales in 2018, to 50% in 2025, and 100% in 2030

¹¹ Motion to Amend Resolution G-3536 to "[r]equest that the Department of Water and Power establish aggressive 2028 and 2038 building electrification targets within their 2018 Integrated Resource Plan that align with the City's existing greenhouse gas reduction targets, as described in Mayor's Sustainability pLAn [sic]." (Feb. 6, 2018), http://clkrep.lacity.org/online/docs/2018/18-0002-S7_mot_2-6-18.pdf.

- Increase the share of high-performance electric induction cooking from 1% sales in 2018, to 50% in 2025, and 100% in 2030

2. **Require that All New Buildings and Major Renovations Be All-Electric.**

In reaching the goal of a zero-emissions building sector, the CAP should adopt the following policy:

Policy: *All newly constructed or renovated buildings will be all-electric, meaning that electricity is the only permanent source of energy for water-heating, mechanical and heating, ventilation and air conditioning (HVAC) (i.e., space-heating and space cooling), cooking, and clothes-drying and there is no gas meter connection.*

A critical first step in reaching the goal of eliminating emissions from buildings is ensuring new and renovated buildings are all-electric. New construction is the most cost-effective and easiest entry point for building electrification. New buildings will also last the longest, making them the most important to electrify to minimize long-term carbon lock-in. Similarly, major renovations provide an opportunity to switch to efficient electric options and avoid locking in a new source of fossil fuel combustion.

All-electric homes are readily achievable. The most recent household energy survey by the U.S. Energy Information Administration found that one in every four homes in the United States is *already* all-electric, and that proportion is steadily rising.¹² Sacramento Municipal Utility District (“SMUD”) has partnered with homebuilders to construct entire neighborhoods that are all-electric, with 400 all-electric homes planned in the next two years alone.¹³ Indeed, some California developers now exclusively build all-electric homes and have already deployed a range of affordable, luxury, single- and multi-family housing units all across the State.¹⁴ For example, CityVentures is building multi-family all-electric homes throughout California.¹⁵ With regard to other building classes, a report by Redwood Energy, *Zero Carbon Commercial Construction: An Electrification Guide for Large Commercial Buildings and Campuses*, highlights how standard all electric designs allow large commercial developments to save money and create more comfortable spaces.¹⁶ The University of California announced in August of 2018 that “[n]o new UC buildings or major renovations after June 2019, except in special

¹² U.S. Energy Information Administration, *What’s New in How We Use Energy at Home: Results from EIA’s 2015 Residential Energy Consumption Survey (RECS)*, at 6 (May 2018), https://www.eia.gov/consumption/residential/reports/2015/overview/pdf/whatsnew_home_energy_use.pdf.

¹³ Justin Gerdes, *All-Electric Homes Are Becoming the Default for New Residential Construction in Sacramento*, Greentech Media (Nov. 13, 2018), <https://www.greentechmedia.com/articles/read/all-electric-homes-are-becoming-the-default-for-new-residential-construction#gs.VYzCCMQ>.

¹⁴ See Redwood Energy, *Development Projects (A Small Sample)*, <https://www.redwoodenergy.tech/development-projects/>.

¹⁵ See, City Ventures Residences, <https://www.cityventures.com> (last visited Dec. 20, 2018).

¹⁶ See, e.g., Redwood Energy, *Zero Carbon Commercial Construction: An Electrification Guide for Large Commercial Buildings and Campuses* (2018), https://drive.google.com/file/d/1J-DHuP5SFY1FUQr2o1ov2cqsqt_arWle/view.

circumstances, will use on-site fossil fuel combustion, such as natural gas, for space and water heating.”¹⁷ This policy is based in part on the results from a number of successful pilots in all-electric buildings throughout the UC system, many of which are non-residential, including a downtown office building at UC Merced and a Genomics Laboratory at Lawrence Berkeley National Laboratory.¹⁸ All-electric restaurants are also growing in popularity with both chefs and manufacturers, who express enthusiasm about the increased efficiency, precision, safety, and flexibility of induction cook stoves.¹⁹

Alternatively, a Green Building Ordinance, or “reach code” that goes beyond the statewide minimum Building Energy Efficiency Code (Title 24) and is explicitly focused on reducing GHG emissions in a cost-effective manner could be adopted that requires, or at a minimum, strongly favors all-electric new construction, particularly for water and space heating. Several cities and counties, such as Palo Alto²⁰ and Marin²¹ have already adopted Green Building Ordinances that support electrification using the 2016 Building Code. Santa Rosa is currently considering an ordinance that would require all new construction to be “electrification-ready.” Many local jurisdictions, including the City of San Francisco, Santa Monica, Marin, and others, are beginning to work with the Statewide Codes and Standards Team to develop a new Green Building Ordinance that supports electrification and that will go beyond the new mandatory 2019 Building Code. The Statewide Codes and Standards Team will provide draft Green Building Ordinance language and a Cost Effectiveness Study in Q1 2019. While an all-electric new home requirement would be most effective at reducing greenhouse gas pollution, at a minimum, an alternative is to adopt a reach code in September 2019, and implement it by January 1, 2020.

3. Adopt a Plan to Electrify County Buildings.

An important opportunity for the County to lead by example and demonstrate the effectiveness and benefits of electrification and clean energy buildings, while simultaneously reducing GHG emissions, is to electrify all gas uses in publicly-owned buildings. According, the CAP should include the following policy:

¹⁷ University of California, *UC sets higher standards, greater goals for sustainability* (Sept. 4, 2018), <https://www.universityofcalifornia.edu/press-room/uc-sets-higher-standards-greater-goals-sustainability>.

¹⁸ *Id.* at 48.

¹⁹ Andrea Victory, *Why Induction Cooking is the Hottest Trend to Hit Restaurant Kitchens*, Food Service and Hospitality (May 31, 2017) <https://www.foodserviceandhospitality.com/why-induction-cooking-is-the-hottest-trend-to-hit-restaurant-kitchens/>

²⁰ Local Energy Efficiency Reach Code from Palo Alto Municipal Code Chapter 16.17, [http://library.amlegal.com/nxt/gateway.dll/California/paloalto_ca/paloaltomunicipalcode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:paloalto_ca](http://library.amlegal.com/nxt/gateway.dll/California/paloalto_ca/paloaltomunicipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:paloalto_ca).

²¹ County of Marin, Green Building Ordinance No. 3685 to Amend Portions of Marin County Title 19 (Building Code), approved March 13, 2018 by Marin County Board of Supervisors.

Policy: *The County shall develop and implement a plan to electrify and disconnect from gas service County-owned facilities.*

The plan to electrify County-owned buildings should include an implementation timeline, require the County to conduct an inventory of government buildings, identify facilities that are ready for routine system replacements as targets for electrification efforts, and document implementation issues, costs, and technical considerations for future planning and expansion efforts.

The County can also work with local school districts to achieve a similar outcome and adopt the following policy in the CAP:

Policy: *The County shall assist local school districts in leveraging government funds (such as Proposition 39) to finance electrification projects at school facilities.*

4. Streamline permitting to make electrifying existing residential and commercial buildings easier for building owners.

The permitting process to replace gas appliances with electric can be overly costly, confusing, and time-consuming for the building owner. This burden paired with building owners' limited knowledge of which contractors and installers are familiar with fuel-switching, can mean electrification projects do not move forward and the building owner invests in another gas appliance that could last ten to twenty years. These impediments should be removed through a review of the existing permitting process for replacing gas water heaters, gas furnaces, gas dryers, and gas stoves with electric appliances as well as for capping the gas meter with ways to lower the cost and expedite the permitting process identified and executed.

5. Develop incentives to lower installation costs of electric appliances.

Rebates and other financial incentives are needed to offset the cost of purchasing and installing advanced electric appliances like heat pumps and induction stoves. Targeted incentives can help to stimulate demand and increase sales, with the end goal of developing a self-sustaining electrification market that is broadly accessible to all Californians.

Policy: *The County shall collaborate with regional organizations and the local electric service provider to promote financing programs for building electrification.*

Policy: *The County shall collaborate with State-sponsored financing offerings and pilots and Property Assessed Clean Energy ("PACE") programs to promote heat pumps and electrification.*

Potential sources of funding include Senate Bill 1477, which will provide \$200 million for “clean heating technologies” in new and existing buildings by 2023. This is a start, but local jurisdictions, utilities, and Community Choice Aggregators (“CCAs”) need to find funding, such as potentially through Air District grants, to support a more substantial incentive program to make clean electric appliances available to a greater number of households and buildings. Another potential source of funding could be CEQA GHG mitigation from projects that are unable to fully mitigate their GHG emissions from all feasible on-site measures alone. This can allow projects under CEQA review to mitigate their GHG emissions to a less-than-significant level and facilitate local emissions reductions.

Many jurisdictions are already leading the way with innovative incentive programs to support electrification. SMUD offers up to \$13,750 for electrification upgrades and appliances. Their Home Performance Program includes a list of participating contractors, rebates for efficiency and electrification upgrades, as well as financing.²² Marin County is currently creating an Appliance Electrification Rebate Program for residential electrification using funding from the regional Air District climate protection grant program and from the county’s Climate Action Plan fund. The City of San Jose is also leveraging Air District award money to fund financial incentives for residents to swap natural gas water heaters with heat pumps.²³

6. Create public education, marketing, and outreach programs to promote fuel switching from gas to electric options

Similar to other clean energy initiatives, building owner and tenant education will be key to successfully removing barriers and improving access. Given that building electrification is in the early stages of market penetration, a greater focus on education and outreach is needed to establish awareness, familiarity, and interest. Education and outreach should be geared to specific market segments and appropriately convey the benefits of electrification, an overview of the technology, as well as resources on where to begin, such as a list of certified contractors and available rebates. Policies to foster public engagement include:

Policy: *The County shall conduct targeted outreach to homeowners and contractors to encourage installation of electric appliances upon routine replacement of natural gas appliances and water heaters.*

²² See SMUD, Home Performance Program, <https://www.smud.org/en/Rebates-and-Savings-Tips/Improve-Home-Efficiency>.

²³ Leslie Steward, *Pumping Heat: Grants Awarded to Increase Home Energy Efficiency* (Nov. 2018), <https://bayareamonitor.org/article/pumping-heat-grants-awarded-to-increase-home-energy-efficiency/>.

For example, Sonoma Clean Power (the CCA in Sonoma County) has done extensive community outreach after the Sonoma County fires to support all-electric rebuilding.²⁴ Their induction cooktops lending program, induction cooking shows online, and other demonstration efforts have led to over 90% of participants expressing interest in all-electric rebuilds.

Policy: *The County shall provide resources on its website to connect residents, businesses, and industrial entities with electrification resources and incentives, and to provide information on the non-energy benefits of electrification such as hazard mitigation, indoor air quality, and health and safety.*

For example, several cities, including Berkeley, Oakland, and Palo Alto have online educational resources on how to electrify gas appliances.²⁵ Website information should also include detailed information on your website on the steps to disconnect a home from natural gas and how to be “electric ready,” which could include an overview about storage, preparing for electric vehicle (“EV”) connections, etc.

Policy: *The County shall hold community workshops, electrification expos, and other educational forums to provide information on the benefits of heat pump and induction stove technologies, cost and installation considerations, and financial incentives.*

7. Support workforce outreach and training

Robust workforce development and training programs will be important to ensure that there are skilled local technicians who can install and service electric technologies like heat pumps and induction stoves over the appliance lifetime. CAP measures can include:

- Support training, apprentice and employer-partnership programs that create pathways to middle-class careers for people facing barriers to quality employment opportunities. Publicly-subsidized electrification projects should require partnerships between training providers and employers.
- Leverage California’s existing workforce training and education system. For example, adding training modules within California’s apprenticeship or community college system is more effective than stand-alone contractor classes.

²⁴ See Sonoma Clean Power, <https://sonomacleanpower.org/programs/advanced-energy-rebuild>.

²⁵ For city website examples, see City of Berkeley, *Residential Heat Pump Water Heaters: Replacing a Gas Water Heater*, <https://www.cityofberkeley.info/HPWH/>; *7 Steps to a Clean Energy Oakland Home*, <http://www2.oaklandnet.com/oakcal/groups/ceda/documents/marketingmaterial/oak066266.pdf>; and City of Palo Alto, *Heat Pump Water Heaters Pilot Program*, https://www.cityofpaloalto.org/gov/depts/utl/residents/resrebate/smartenergy/heat_pump_water_heaters/heat_pump_water_heater_pilot_program.asp.

- Ensure that workforce training leads to industry-recognized credentials.

8. Break down clean energy silos – offer special incentives, financing, and other programs that support pairing electrification with new EV charging, rooftop PV, and/or energy efficiency upgrades

Consumer interest in rooftop solar and electric vehicles is becoming mainstream across California. Finding innovative ways to pair electrification with new solar installs, EV-charging, and/or energy efficiency upgrades will open a larger consumer base for electrification, lower energy bills and shorten payback periods, support appropriately-sized and managed systems, and potentially make the residential and commercial clean energy projects more profitable for the contractor or installer. Measures can include:

- Offer larger incentives for clean technology-combination installs
- Create and/or expand bulk buy programs to include heat pumps and induction stoves
- Establish accessible financing mechanisms to support larger-scale clean energy upgrades

III. There Are Multiple Co-Benefits to Achieving Zero Emission Buildings through Electrification.

Beyond achieving the energy and GHG emissions reductions essential for preventing climate breakdown, building electrification will produce a range of important co-benefits for the economic well-being, safety, and health of the community. Building electrification offers the potential to lower energy bills, reduce the cost of new construction, improve air quality, public safety, and climate resiliency, as well as create new jobs. Far from being a barrier to new housing, all-electric new construction can enable greater opportunities for affordable housing construction by reducing costs and streamlining mitigation requirements. For disadvantaged populations that pay a disproportionate amount of their income to energy costs, and who are more likely to suffer from asthma due to poor indoor air quality, zero emission homes are an important opportunity to deliver social equity.²⁶

A. Lowering Energy Bills and Cost of New Construction

All-electric buildings can lower utility bills for tenants, reduce the cost of construction of new housing in the County, and shield customers from the volatile and increasing costs of gas. A recent report, *Decarbonization of Heating Energy Use in California Buildings*, by Synapse Energy Economics found that electrification could lower utility bills by up to \$800 annually and

²⁶ Kelly Vaughn, *Social Equity, Affordable Housing, and the Net-Zero Energy Opportunity*, Rocky Mountain Institute (May 9, 2018), <https://rmi.org/social-equity-affordable-housing-and-the-net-zero-energy-opportunity/>.

lower the cost of new construction in Los Angeles by roughly \$1,500 to \$6,000.²⁷ Other analysis has found that new homes and apartment buildings can cost between \$1,000 and \$18,000 less to build if they are not connected to gas distribution pipelines.²⁸ Another study by Rocky Mountain Institute similarly found new all-electric homes provided cost savings.²⁹ The results are clear: “[f]or newly constructed buildings, heat pumps are universally more cost-effective, even without optimizing for demand flexibility, primarily because the heat pump provides both heating and air conditioning, avoiding the need to purchase both a furnace and an air conditioner.”³⁰

B. A Safer Community

Recent events from Aliso Canyon, San Bruno, and the state of Massachusetts add to the devastating record of hazardous natural gas infrastructure. Between 2015 and 2017, natural gas pipeline explosions and incidents in the country claimed on average 15 fatalities, 57 injuries, and \$316,647,907 in property damage *annually*.³¹ As climate impacts intensify, the escalating risks of aging natural gas infrastructure will outpace the industry’s rate of pipeline replacement. Sea level rise, which promises to be one of the many significant climate impacts affecting the region, especially amplifies the risks of natural gas.³²

Methane leakage, a pervasive problem with natural gas infrastructure, can be particularly hazardous for families living in earthquake and fire-prone areas since leaking gas exacerbates fires after earthquakes. The California Seismic Safety Commission estimates that 20 to 50 percent of total post-earthquake fires are fires related to gas leaks.³³ Beginning to electrify entire communities is a key precautionary strategy to mitigate the growing risks of California’s massive gas system.

C. Improved Air Quality

Gas appliances in buildings make up a quarter of California’s nitrogen oxide (NO_x) emissions from natural gas. NO_x is a precursor to ozone and a key pollutant to curb in order to comply with state and federal ambient air quality standards. Electrifying buildings will help reduce NO_x and ground level ozone, improving *outdoor* air quality and benefiting public health. Electrification of fossil fuel appliances will also immediately improve *indoor* air quality and

²⁷ Synapse Energy Economics, *Decarbonization of Heating Energy Use in California Buildings* at 2, 39 (Oct. 2018), <http://www.synapse-energy.com/sites/default/files/Decarbonization-Heating-CA-Buildings-17-092-1.pdf>.

²⁸ Stone Energy Associates, *Accounting for Cost of Gas Infrastructure*, CEC Docket 17-BTSD-01 (May 4, 2017), <https://efiling.energy.ca.gov/GetDocument.aspx?tn=217420&DocumentContentId=26959>.

²⁹ Rocky Mountain Institute, *The Economics of Electrifying Buildings* (June 2018), <https://rmi.org/insight/the-economics-of-electrifying-buildings/>.

³⁰ *Id.* at 29-30.

³¹ Pipeline and Hazardous Materials Safety Administration, *Pipeline Incident 20 Year Trends* (Nov. 2018), <https://www.phmsa.dot.gov/data-and-statistics/pipeline/pipeline-incident-20-year-trends>.

³² Radke *et al.*, *Assessment of California’s Natural Gas Pipeline Vulnerability to Climate Change*, University of California, Berkeley (2016), <https://www.energy.ca.gov/2017publications/CEC-500-2017-008/CEC-500-2017-008.pdf>.

³³ California Seismic Safety Commission, *Improving Natural Gas Safety in Earthquakes* at 1 (adopted July 11, 2002), http://ssc.ca.gov/forms_pubs/cssc_2002-03_natural_gas_safety.pdf.

health. On average, Californians spend 68 percent of their time indoors, making indoor air quality a key determinant of human health.³⁴ The combustion of gas in household appliances produces harmful indoor air pollution, specifically nitrogen dioxide, carbon monoxide, nitric oxide, formaldehyde, acetaldehyde, and ultrafine particles.³⁵ The California Air Resources Board warns that “cooking emissions, especially from gas stoves, have been associated with increased respiratory disease.”³⁶ Young children and people with asthma are especially vulnerable to indoor air pollution.

D. Pathways to Good, Green Jobs

Electrification of buildings will also development of the local workforce for jobs that will be critical in California’s broader energy transition. Partnering with local organizations and community colleges, local governments can foster training and pipeline programs for new jobs in construction, HVAC installation, electrical work, energy efficiency and load management services, as well as manufacturing.

These jobs will rapidly grow in demand as local governments across the state look to rapidly address the emissions from their building sector. In Sacramento Municipal Utility District territory, where all-electric buildings are quickly becoming the default for new developments, demand for specialized plumbers and HVAC technicians is expected to grow enormously. The region expects to install more than 300,000 heat pump space heaters in the next 15 to 20 years.³⁷

The next one to five years will be a critical window of opportunity to jump-start this transition away from gas to clean energy buildings. We urge your leadership on electrifying and decarbonizing residential, commercial, and municipal buildings. Sierra Club and Earthjustice look forward to continuing to work with you to ensure a robust and CEQA-complaint CAP.

Please contact Matt Vespa at mvespa@earthjustice.org and Sasan Saadat at ssaadat@earthjustice.org at Earthjustice and Rachel Golden at rachel.golden@sierraclub.org with any questions or concerns and please include each of us in future notifications on CAP development.

³⁴ Klepeis *et al.*, *The National Human Activity Pattern Survey (NHAPS): A Resource for Assessing Exposure to Environmental Pollutants*, J. EXPO. ANAL. ENVIRON. EPIDEMIOL., Vol. 11(3), 231-52 (2001).

³⁵ See, e.g., Logue *et al.*, *Pollutant Exposures from Natural Gas Cooking Burners: A Simulation-Based Assessment for Southern California*, ENVIRON. HEALTH PERSP., Vol. 122(1), 43-50 (2014); Victoria Klug & Brett Singer, *Cooking Appliance Use in California Homes—Data Collected from a Web-based Survey*, LAWRENCE BERKELEY NATIONAL LABORATORY (Aug. 2011); John Manuel, *A Healthy Home Environment?* ENVIRON. HEALTH PERSP., Vol. 107(7), 352-57 (1999); Mullen *et al.*, *Impact of Natural Gas Appliances on Pollutant Levels in California Homes*, LAWRENCE BERKELEY NATIONAL LABORATORY (2012).

³⁶ California Air Resources Board, *Combustion Pollutants* (last reviewed Jan. 19, 2017), <https://www.arb.ca.gov/research/indoor/combustion.htm>.

³⁷ Justin Gerdes, *Experts Discuss the Biggest Barriers Holding Back Building Electrification*, Greentech Media (Sept. 19, 2018), <https://www.greentechmedia.com/articles/read/here-are-some-of-the-biggest-barriers-holding-back-building-electrification#gs.fBEKJy2>.

Sincerely,

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Subject:

FW: HAZ-10.11 in the General Plan

From: Mary Olson [mailto:MaryO93003@charter.net]

Sent: Monday, September 9, 2019 12:00 PM

To: ClerkoftheBoard, ClerkoftheBoard <ClerkoftheBoard@ventura.org>

Subject: HAZ-10.11 in the General Plan

Please make sure that HAZ-10.11 remains in the General Plan to ensure that in evaluating air quality impacts, the County considers total emissions from both stationary and mobile sources as required by the California Environmental Quality Act.

This is important because in the past, staff has failed to be in compliance with CEQA in ministerial approval of new drilling permits.

Sincerely

Mary Olson