Subject: GPU Background Report Comments

From: Phil White
Sent: Wednesday, November 08, 2017 12:00 PM
To: Prillhart, Curtis, Susan, Downing, Clay
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Good morning Kim,

In the past week, I have gone through the draft Background Report; thank you for making a hard copy available to me. I am offering the following comments:

Chapter 1, page 1-2, second paragraph currently states: "For instance, projections prepared at the State level (by the California Department of Finance) or regional level (by the Southern California Association of Governments), provide the basis for assessing potential demand for different use." There are other projections that should be evaluated as alternatives, such as Mr Smith's suggestion to include an alternative projection based on the actual growth that has occurred in the unincorporated areas of the County in the period 1990 to 2016. I recommend that the highlighted sentence be re-written to read: "For instance, projections prepared at the State (by the California Department of Finance) or regional level (by the Southern California Association of Governments), or actual historical growth rates experienced in the unincorporated areas of the County, or other alternative projections, provide the basis for assessing potential land uses needed to meet projections."

Chapter 3, page 3-58, Under "Residential Designations" should delete "North Ventura Avenue Area Plan" and say "Ojai Valley Area Plan."

Chapter 3, page 3-104, discussion of accessory dwelling units should be modified to acknowledge the recent Board action on ADU's.

Chapter 4, page 4-2, Major Findings. A bullet point should be added to acknowledge that "Ventura County air violates State and Federal air quality health standards for ozone and particulate matter. This means that on a significant number of days, the air is unhealthy, especially for children, the elderly, and people with respiratory problems."

Chapter 4, page 4-38, second paragraph. I suggest deleting the first sentence about greenhouse gas emissions since this paragraph is about ozone air pollution, not climate change.

Chapter 6, page 6-22 last paragraph. The statement "Per SB 743, VMT is now the basis for transportation impact identification and mitigation under the California Environmental Quality Act" has been called into question by Mr Smith. This may not be an accurate summary of the implementation of SB 743. This should be checked and the statement corrected if it is inaccurate.

Chapter 6, page 6-34, SB 743. Again, Mr Smith's comments about what SB 743 has or hasn't done about evaluating transportation impacts and mitigation under CEQA (VMT and LOS) should be checked and the statement corrected if it is inaccurate.

Chapter 6, figure 6-6 hiking trails. I suggest adding the trails at the Ventura Botanical Gardens in downtown Ventura. They have consistently been noted as "most popular" in surveys and are extremely well-used.
Chapter 6, page 6-55, third paragraph, Global Warming. I suggest this paragraph be expanded to explain in more detail what SCAG has prepared for Ventura County for a Sustainable Communities Strategy, and what targets have been developed for the County.

Chapter 7, page 7-46, Generation Facilities. This discussion should be expanded to account for the growth of photovoltaic electrical generation in the County. Also, there is a new fossil fuel power plant proposed for construction in Santa Paula.

Chapter 8, page 8-2, first paragraph, Air Quality. This paragraph is not correct. It should be re-written to state: "While substantial improvement has been made towards reducing the levels of County air pollution, Ventura County exceeds air quality health standards for both ozone and particulate matter. Thus far in 2017, the State air quality standard for ozone has been exceeded in the County on 22 days. When air quality standards are exceeded, the air is considered unhealthy, particularly for children, the elderly, and people with respiratory problems."

Chapter 8, page 8-74, last paragraph, Sand and Gravel. A recent trend in Southern California is the transport by ship of large quantities of sand and gravel from Canada (recent LA Times article). This should be acknowledged since it may take away much of the pressure on needing to use local resources.

Chapter 8, page 8-81, Major Findings, last bullet. ..."hydroelectric and biomass facilities are the only current sources of renewable energy generation in Ventura County." This is an incorrect statement which needs correction. There is a growing capacity of solar photovoltaic electrical generation in the County, such as the parking lot at the County Government Center.

Chapter 8, Table 8-11, Air Pollution Data. Since 2017 has shown a marked increase in the number of days exceeding State and Federal ozone standards over what was measure in recent years, the up to date information should be included here.

Chapter 11, figure 11-1, Faults. Since the San Andreas fault is one of the biggest, if not the biggest earthquake threat to Ventura County, it makes sense to show it on the map, even if it is not in the County.

Chapter 12, page 21-1, Climate Change. I suggest adding the following to the introduction: "Ventura County will need to develop a strong and effective plan to address climate change, including measures to reduce greenhouse gas (GHG) emissions and to increase resilience to the effects of climate change."

Thank you for the opportunity to comment.

Phil White