

6 ALTERNATIVES

6.1 INTRODUCTION

The California Code of Regulations (CCR) Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe "... a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]).

The State CEQA Guidelines further require that the "no project" alternative be considered (CCR Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR "...shall also identify an environmentally superior alternative among the other alternatives" (CCR Section 15126[e][2]).

In defining "feasibility" (e.g., "... feasibly attain most of the basic objectives of the project ..."), CCR Section 15126.6(f) (1) states, in part:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project’s significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, an EIR must contain a discussion of “potentially feasible” alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency’s decision-making body, here the Ventura County Board of Supervisors. (See PRC Sections 21081.5, 21081[a] [3].) At the time of action on the project, the decision-maker(s) may consider evidence beyond that found in this draft EIR in addressing such determinations. The decision-maker(s), for example, may conclude that a particular alternative is infeasible (i.e., undesirable) from a policy standpoint, and may reject an alternative on that basis provided that the decision-maker(s) adopts a finding, supported by substantial evidence, to that effect, and provided that such a finding reflects a reasonable balancing of the relevant economic, environmental, social, and other considerations supported by substantial evidence. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998.)

6.2 2040 GENERAL PLAN DEVELOPMENT

The 2040 General Plan, as proposed, is the product of a planning process that included the preparation of an Alternatives Report (Ventura County 2018). As described in Chapter 3, “Project Description,” this process incorporated community input and regulatory requirements, under the guidance of industry professionals, to consider land use and policy options during development of the 2040 General Plan. The Planning Commission and Board of Supervisors selected a Preferred Alternative based on the findings of the Alternatives Report that provided the framework for preparing the 2040 General Plan.

6.3 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

6.3.1 Attainment of Project Objectives

As described above, one factor that must be considered in selection of alternatives is the ability of a specific alternative to attain most of the basic objectives of the project (CCR Section 15126.6[a]). Chapter 3, “Project Description,” articulated the project objectives for the 2040 General Plan. For this draft EIR, the project objectives are defined as being expressed by the Guiding Principles contained in Section 1.2 of the 2040 General Plan. The project objectives are defined as follows:

- ▶ **Land Use and Community Character:** Direct urban growth away from agricultural, rural, and open space lands, in favor of locating it in cities and unincorporated communities where public facilities, services, and infrastructure are available or can be provided.
- ▶ **Housing:** Support the development of affordable and equitable housing opportunities by preserving and enhancing the existing housing supply and supporting diverse new housing types, consistent with the Guidelines for Orderly Development.
- ▶ **Circulation, Transportation, and Mobility:** Support the development of a balanced, efficient, and coordinated multimodal transportation network that meets the mobility and accessibility needs of all residents, businesses, and visitors.

- ▶ **Public Facilities, Services, and Infrastructure:** Invest in facilities, infrastructure, and services, including renewable energy, to promote efficiency and economic vitality, ensure public safety, and improve quality of life.
- ▶ **Conservation and Open Space:** Conserve and manage the County's open spaces and natural resources, including soils, water, air quality, minerals, biological resources, scenic resources, as well as historic and cultural resources.
- ▶ **Hazards and Safety:** Minimize health and safety impacts to residents, businesses and visitors from human-caused hazards such as hazardous materials, noise, air, sea level rise, and water pollution, as well as managing lands to reduce the impacts of natural hazards such as flooding, wildland fires, and geologic events.
- ▶ **Agriculture:** Promote the economic vitality and environmental sustainability of Ventura County's agricultural economy by conserving soils/land while supporting a diverse and globally competitive agricultural industry that depends on the availability of water, land, and farmworker housing.
- ▶ **Water Resources:** Develop and manage water resources in a manner that addresses current demand without compromising the ability to meet future demand, while balancing the needs of urban and agricultural uses, and healthy ecosystems.
- ▶ **Economic Vitality:** Foster economic and job growth that is responsive to the evolving needs and opportunities of the County's economy, and preserves land use compatibility with Naval Base Ventura County and the Port of Hueneme, while enhancing quality of life and promoting environmental sustainability.
- ▶ **Climate Change and Resilience:** Reduce greenhouse gas emissions to achieve all adopted targets, proactively anticipate and mitigate the impacts of climate change, promote employment opportunities in renewable energy and reducing greenhouse gases, and increase resilience to the effects of climate change.
- ▶ **Healthy Communities:** Promote economic, social, and physical health and wellness by investing in infrastructure that promotes physical activity, access to healthy foods, supporting the arts and integrating Health in All Policies into the built environment.
- ▶ **Environmental Justice:** Commit to the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies, protect disadvantaged communities from a disproportionate burden posed by toxic exposure and risk, and continue to promote civil engagement in the public decision-making process.

6.3.2 Environmental Impacts of the 2040 General Plan

Sections 4.1 through 4.17 of this draft EIR address the environmental impacts of implementation of the 2040 General Plan. Potentially feasible alternatives were developed with consideration of avoiding or lessening the significant, and potentially significant, adverse impacts of the project, as identified in Chapter 4 of this draft EIR and summarized below. If an environmental issue area analyzed in this draft EIR is not addressed below, it is because no significant impacts were identified for that issue area.

SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE 2040 GENERAL PLAN

Significant and unavoidable environmental impacts resulting from the 2040 General Plan were identified, as follows.

Agriculture and Forestry Resources:

- ▶ Impact 4.2-1: Loss of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance

Air Quality:

- ▶ Impact 4.3-2: Cause Construction-Generated Criteria Air Pollutant or Precursor Emissions to Exceed VCAPCD-Recommended Thresholds
- ▶ Impact 4.3-3: Result in a Net Increase in Long-Term Operational Criteria Air Pollutant and Precursor Emissions That Exceed VCAPCD-Recommended Thresholds

Biological Resources:

- ▶ Impact 4.4-1: Disturb or Result in Loss of Special-Status Species and Habitat
- ▶ Impact 4.4-2: Disturb or Result in Loss of Riparian Habitat, Sensitive Plant Communities, ESHA, Coastal Beaches, Sand Dunes, and Other Sensitive Natural Communities
- ▶ Impact 4.4-3: Disturb or Result in Loss of Wetlands and other Waters
- ▶ Impact 4.4-4: Interfere with Resident or Migratory Wildlife Corridors or Native Wildlife Nursery Sites

Cultural, Tribal Cultural, and Paleontological Resources:

- ▶ Impact 4.5-1: Substantial Adverse Change in the Significance of an Archaeological Resource Pursuant to PRC 5024.1 and CEQA
- ▶ Impact 4.5-2: Substantial Adverse Change in the Significance of a Historic Resource Pursuant to PRC 5024.1 and CEQA
- ▶ Impact 4.5-3: Substantial Adverse Change in the Significance of a Tribal Cultural Resources
- ▶ Impact 4.5-4: Result in Grading and Excavation of Fossiliferous Rock or Increase Access Opportunities and Unauthorized Collection of Fossil Materials from Valuable Sites

Greenhouse Gas Emissions:

- ▶ Impact 4.8-1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment.
- ▶ Impact 4.8-2: Conflict with an Applicable Plan, Policy, or Regulation for the Purpose of Reducing the Emissions of GHGs

Hazards, Hazardous Materials, and Wildfire:

- ▶ Impact 4.9-6: Expose People to Risk of Wildfire by Locating Development in a High Fire Hazard Area/Fire Hazard Severity Zone or Substantially Impairing an Adopted Emergency Response Plan or Evacuation Plan or Exacerbate Wildfire Risk

Mineral and Petroleum Resources

- ▶ Impact 4.12-3: Result in Development on or Adjacent to Existing Petroleum Resources Extraction Sites or Areas Where Petroleum Resources Are Zoned, Mapped, or Permitted for Extraction, Which Could Hamper or Preclude Access to the Resources

Noise and Vibration

- ▶ Impact 4.13-3: Expose Existing Sensitive Receptors to Traffic-Noise Increases
- ▶ Impact 4.13-6: Expose Sensitive Receptors to Construction Vibration Levels That Exceed Applicable Standards

Public Services and Recreation:

- ▶ Impact 4.15-2: Require Expansion or Construction of New Facilities to Support Law Enforcement and Emergency Services
- ▶ Impact 4.15-3: Require Expansion or Construction of New Fire Protection Facilities and Services as a Result of Excessive Response Times, Project Magnitude, or Distance from Existing Facilities
- ▶ Impact 4.15-4: Require Expansion or Construction of New Public Libraries or Other Facilities to Meet New Demand or Address Overcrowding and Accessibility
- ▶ Impact 4.15-5: Require Expansion or Construction of New Parks and Recreation Facilities and Services or Cause Substantial Physical Deterioration of Parks and Recreation Facilities Because of Overuse

Transportation and Traffic:

- ▶ Impact 4.16-1: Exceed VMT Thresholds
- ▶ Impact 4.16-2: Transportation Infrastructure Needed to Accommodate Growth Would Result in Adverse Effects Related to County Road Standards and Safety
- ▶ Impact 4.16-3: Result in Inadequate Emergency Access

Utilities:

- ▶ Impact 4.17-2: Increase Demand on a Utility That Results in the Relocation or Construction of New, or Expansion of Existing Water, Wastewater, Electric Power, Natural Gas, or Telecommunications Infrastructure, Resulting in the Potential for Significant Environmental Impacts
- ▶ Impact 4.17-4: Result in Development That Would Adversely Affect Water Supply Quantities during Normal, Single-Dry, and Multiple-Dry Years

IMPACTS THAT CAN BE REDUCED TO A LESS-THAN-SIGNIFICANT LEVEL THROUGH MITIGATION MEASURES

Aesthetics, Scenic Resources, and Light Pollution:

- ▶ Impact 4.1-3: Create a New Source of Disability Glare or Discomfort Glare for Motorists Traveling along Any Road of the County Regional Road Network

Air Quality:

- ▶ Impact 4.3-5: Expose Sensitive Receptors to Substantial Increases in Toxic Air Contaminant Emissions

Mineral and Petroleum Resources:

- ▶ Impact 4.12-4: Result in the Loss of Availability of a Known Petroleum Resource That Would Be of Value to the Region and the Residents of the State

Public Services and Recreation:

- ▶ Impact 4.15-1: Increase Demand for Law Enforcement and Emergency Services as a Result of Inadequate Security Measures

Transportation and Traffic:

- ▶ Impact 4.16-5: Substantially Interfere With Railroad Facility Integrity and/or Operations

6.4 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

As described above, State CEQA Guidelines Section 15126.6(c) provide that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project, and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165-1167.) The EIR should also identify any alternatives that were considered by the lead agency, but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination. The following alternatives were considered but are not evaluated further in this draft EIR.

6.4.1 Alternative Locations

CEQA Guidelines Section 15126.6(f)(2) states that the "key question and first step" in analysis of alternatives is whether any significant impacts would be avoided or substantially lessened by moving the project to an alternative location.

REASONS FOR REJECTION

The 2040 General Plan is a comprehensive update of the existing General Plan for the County of Ventura. The 2040 General Plan establishes the County's vision for development and resource management through the year 2040 and will serve as the fundamental land use and resource policy document for the County. Therefore, an alternative site or location where the 2040 General Plan could be implemented would not be feasible or appropriate because the County only has jurisdiction over lands within its legal boundaries. As such, this alternative has been rejected from further consideration.

6.4.2 No Development Alternative

Many of the significant and unavoidable effects of the 2040 General Plan are associated with future development that would accommodate the forecast growth in the county. These include the loss of Important Farmland; the potential for change in the significance of cultural, paleontological, and tribal cultural resources; the potential to locate development in a High Fire Risk Area; increased VMT and effects on air quality. The No Development Alternative would prohibit all new development. No alterations to the unincorporated areas would occur (with the exception of previously approved or entitled development); all existing residential, commercial, office, industrial, public facilities, agriculture and open space, along with utilities and roadways would generally remain in their current condition.

REASONS FOR REJECTION

This alternative was rejected from detailed consideration in the draft EIR because it would not meet the County's housing obligations and would be inconsistent with the project objectives. Implementation of this alternative would not provide adequate housing to meet the County's obligations to provide its fair share of housing.

As described in Section 4.14, “Population and Housing,” Government Code Section 65863 requires that cities and counties ensure their general plans provide for regional housing needs. In addition, cities and counties are required to have no “net loss” of lower and moderate-income dwelling units. The County cannot take action that would reduce identified affordable housing sites for these income categories. Due to inconsistency with state regulations, this alternative would be infeasible. It should also be noted that this alternative would not achieve several of the objectives established for the 2040 General Plan. Specifically, the objectives related to providing housing; public facilities, services, and infrastructure; and economic vitality. As a result, this alternative has been rejected from further consideration.

6.4.3 Downzoning Alternative

This alternative would include the same policies and implementation programs as the 2040 General Plan but would revise the land use diagram (see Figures 3-2a and 3-2b in Chapter 3, “Project Description”) as follows in order to encourage more compact development patterns. The Very Low Density Residential (4 du/ac), Low Density Residential (6 du/ac), and Rural (1 du/2 ac) land use designations would be eliminated and lands with these designations in the 2040 General Plan would be changed to the Open Space (1 du/10 ac, or 1 du/20 ac if contiguous with Agricultural) land use designation. This alternative would greatly reduce allowable development densities and intensities in these areas.

REASONS FOR REJECTION

The County’s public engagement during development of the General Plan update included advisory body and community outreach on issues related to land use alternatives and policy direction by the Board of Supervisors but did not envision or discuss a land use scenario for downzoning a substantial portion of land within the unincorporated area by reducing allowable density and intensity on the land. This alternative would not align primarily with the Housing Guiding Principle, and secondarily with Agriculture and Economic Vitality Guiding Principles, in that it would reduce availability for housing, further constraining the ability of the County to meet its allocation of the Regional Housing Needs Assessment which will provide a range of housing types for all income levels, including housing to foster the agricultural industry and housing as an overall necessity for the County’s economic vitality. Increasing housing supply will rely not only on key sites identified for duplex, triplex or larger housing complexes, but also a significant reliance on Accessory Dwelling Units (ADUs) across the Very Low, Low and Rural residential land uses as an effective strategy for housing unit production. Downzoning these lands would restrict the potential for land subdivision and/or permitting of additional units due to density which would result in less ADUs or new single family homes from being created. As a result, consideration of this alternative has been eliminated from further evaluation.

6.4.4 Limit Active and Idle Wells and Reduce Oil Well Emissions Alternative

In its February 19, 2019, comment letter on the notice of preparation (NOP), Citizens For Responsible Oil & Gas (CFROG, which is now known as Climate First: Replacing Oil & Gas), commented that the range of alternatives in the EIR, “...should include at a minimum adoption of specific policies to limit increases in the number of active and idle wells in the County and to reduce oil well emissions by at least 10 percent per year.”

REASONS FOR REJECTION

This alternative was rejected from detailed consideration in the draft EIR for the following reasons. As an initial matter, major elements of this alternative are included in the 2040 General Plan. For example, the 2040 General Plan includes several policies that would have the effect of limiting increases in the number of new discretionary oil and gas wells in the county. Policy COS-7.2 would require that new oil wells subject to discretionary approval are located a minimum of 1,500 feet from residential dwellings and 2,500 feet from any school. The substantial increases in setback requirements for new wells subject to discretionary permitting established by this policy would likely reduce the number of new discretionary oil and gas wells by prohibiting new discretionary wells within certain areas. In addition, there are two policies proposed in the 2040 General Plan that would result in new requirements that would apply to new oil and gas projects subject to discretionary action by the County that would reduce the number of new discretionary oil and gas wells without placing a physical limitation on location or access: Policy COS-7.8 would require oil wells to use pipelines to convey oil and produced water (rather than trucking) and Policy COS-7.9 would require that gases emitted from all new discretionary oil and gas wells are collected and used or removed for sale or proper disposal (rather than flaring) except for cases of emergency or for testing purposes. For several economic, legal, technological, and other reasons described in more detail in Section 4.12, “Mineral and Petroleum Resources,” Policies COS-7.8 and COS-7.9 could make new oil and gas wells subject to the County’s discretionary approval process infeasible.

This alternative was also rejected from detailed consideration in the draft EIR because it focuses on one specific land use and does not comprehensively address most of the basic project objectives, including: directing urban growth away from agricultural, rural, and open space lands; supporting the development of affordable and equitable housing opportunities; promoting an efficient multimodal transportation network; investing in public facilities, services, and infrastructure; supporting the agricultural industry through water, land, and farmworker housing; and fostering economic and job growth.

6.4.5 Eliminate or Reduce Existing Oil and Gas Wells or Production Alternative

Comments submitted in response to the NOP recommended that the County take actions to eliminate or greatly reduce the number of existing oil and gas wells in the county, and/or the amount of oil and gas extracted from existing wells in the county. As with the above-described comment recommending the County’s limitation on new active and idle oil wells and emissions, this comment was likewise rejected from detailed consideration in the draft EIR because it focuses on one specific land use and does not comprehensively address most of the basic project objectives. This alternative would also present legal and economic feasibility issues that could be implicated by County efforts to eliminate or reduce production from existing oil and gas wells.

6.4.6 Carbon Neutrality Alternative

Public comments raised in response to the NOP suggested that the 2040 General Plan should set a carbon neutrality, or “zero-carbon” greenhouse gas (GHG) target for future operation in line with the goals established by the State in Executive Order B-55-18.

This alternative would achieve greater GHG reductions than the 2040 General Plan’s long-term GHG reduction targets of 80 percent below 1990 statewide emissions levels, consistent with EO S-03-05. While in line with a goal set forth in the Executive Order, achieving carbon neutrality county-wide would require implementation of measures well above and beyond state legislation and regulations, and well beyond the jurisdiction and authority of the County. The California Air Resources Board (CARB) 2017 Scoping Plan demonstrates how the State could reduce emissions 40 percent below 1990 levels by 2030 but does not consider adoption of a carbon neutrality goal by 2030 or any other target year. To reach carbon neutrality, more significant reductions in GHG emissions must occur statewide, nationally, and globally.

Specifically, to achieve carbon neutrality by 2040 (the horizon year of the 2040 General Plan), more advanced GHG reduction measures focusing on larger emission sectors, such as transportation and the existing environment would need to be implemented, with a smaller proportion of reductions coming from new development. These measures would include, but not be limited to: net zero energy requirements for both existing and new buildings; combination of distributed and consolidated renewable generation systems; major improvements in and expansion of public transit infrastructure and operations and retrofitting of all existing roadway and highway networks to significantly increase ridership, walking, and biking and greatly reduce personal and commercial vehicle use; large scale decarbonization of household and commercial passenger vehicle, medium duty, and heavy duty transportation fleets; phase-out of fossil fuels in vehicles, equipment, and buildings; significant reductions in imported water and greater reliance on and use of local water sources; replacement of existing anaerobic septic systems with aerobic systems; and achievement of zero waste. Suggestions provided in NOP comments for achieving carbon neutrality include the elimination of fossil fuel consumption in existing buildings transitioning to a carbon-free economy, and sequestering carbon dioxide using natural and working lands.

REASONS FOR REJECTION

Achievement of carbon neutrality would require rapid, far-reaching, and unprecedented changes in all aspects of society. These include changes to the national and even global economic system and both individual and cultural values and behaviors related to consumption, lifestyle, travel, diet, and the like. Implementation of most of these changes, such as retrofitting the entire existing building stock to be zero net energy and zero carbon; substantially eliminating use of fossil fuels in all aspects of the transportation system; fundamentally changing systems for generating and distributing electricity; substantial changes to agricultural industry and practices so that agriculture becomes carbon neutral or a sink for emissions; and creating systems of economic production, distribution, and consumption that do not use fossil fuels.

While the 2040 General Plan includes policies and implementation programs and other measures to achieve GHG reductions and help put the County’s future emissions on a downward trajectory, which would be consistent with and supportive of a larger State, national, or international effort to achieve carbon neutrality (for discussion of the 2040 General Plan’s policies and implementation programs to reduce GHG emissions refer to Section 4.8, “Greenhouse Gas Emissions”), the transformational changes to all aspects of society required to achieve carbon neutrality are outside of the County’s or any individual local government’s ability to directly control or effect.

These and other changes required to achieve carbon neutrality would likely require the coordinated effort of multiple levels of government and private economic actors, including at a minimum substantial and transformative laws, regulations, funding allocations targeting all aspects of society, the economy, and the environment from the State and federal governments. Major changes to lifestyles and behaviors of individual residents and businesses would need to occur either as a result of major government intervention or in tandem with it.

While some of the measures of a carbon neutral alternative may be possible from a technological standpoint (such as designing existing buildings to be zero net energy), the County does not have the legal authority to require many of these improvements, such as improvements to existing homes and businesses, which may account for a majority of emissions in the future as new construction becomes increasingly more efficient, major changes to the existing State or federal highway system, and substantial investment in new or expanded public transit systems, such as rail or bus systems. Certain measures, such as constructing new public transit infrastructure and operating transit services, in the county, may have financial constraints, and the County would not have access to the significant funding amounts needed to be able to construct the infrastructure and operate services at a scale that would attract significant ridership. Further, to achieve GHG emissions reductions that would meet carbon neutrality, a significant combination or all of the above measures would need to be implemented, the economic feasibility of which is not known because the cost of those measures is not currently known.

With respect to the role of carbon sequestration in achieving carbon neutrality, EO B-55-18 explains that CARB will develop a framework for implementation and accounting that tracks progress toward this goal. To date, this framework has not been developed and; therefore, local agencies do not have clear direction on which sectors and activities would apply to the goal, acceptable methods for accounting carbon sequestration activities, or a functional definition of carbon neutrality. A Natural and Working Lands Report has been published by the California Natural Resources Agency, and other agencies including CARB, to provide information to state agencies on potential carbon sequestration techniques, but this report is still in draft form and does not include an accounting methodology for tracking the performance of programs at the local level (CalEPA et al 2019).

Comments also suggest that the County could create a carbon-free economy (an important component of achieving carbon neutrality) by replacing jobs in the oil and gas industry at a 2-to-1 ratio with new jobs in renewable energy or energy efficiency industries. Research on employment in the oil and gas trades indicates that the oil and gas industry directly employed 2,505 individuals in Ventura County in 2017 (LAEDC 2019). Creating approximately 5,000 new job opportunities in the fields of renewable energy and energy efficiency could attract workers from a wide variety of employment backgrounds, including oil and gas and non-oil and gas industries. To the extent the County could create or attract this many jobs in renewable energy or energy efficiency, the County does not have the authority to intervene into the private labor market to require that workers from the oil and gas industry would be hired for these new job opportunities. Moreover, the County lacks the legal and jurisdictional authority and access to funding necessary to directly transition the County's entire economy to carbon-free energy sources.

The elimination of all fossil fuel consumption from existing buildings focuses on the removal of existing natural gas appliances and infrastructure from buildings (or halting the operation of existing natural gas pipelines and distribution infrastructure that delivers natural gas to existing buildings), replacing natural gas end uses with electric or other zero carbon alternatives, and to make buildings all-electric and carbon neutral by serving them with carbon neutral or zero carbon electricity. This approach does not ensure carbon neutrality; however, because existing buildings in rural areas also use propane and wood for heating, and the County does not have the capacity to track the consumption of these resources or the authority to prohibit residents from consuming them. Recommendations to require residents to use electric heat-pump technologies as an alternative to natural gas for water and space heating also face a legal hurdle of federal preemption which prevents local governments from adopting codes that prohibit gas consuming appliances that have been approved for sale nationwide by the U.S. Department of Energy (NBI 2017). Under Assembly Bill 3232 the CEC has been tasked with evaluating the feasibility of electrifying new and existing buildings to reduce GHG emissions in the state’s building stock to 40 percent below 1990 levels by 2030. But the feasibility of these targets is not scheduled to be determined and the report for this is scheduled release for 2021, which is after the timeframe that the 2040 General Plan will be considered for adoption.

For the reasons provided above this alternative was rejected from further consideration.

6.5 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

The following alternatives are evaluated in detail in this draft EIR.

- ▶ **Alternative 1: No Project-No General Plan Update**
- ▶ **Alternative 2: Existing Community and Urban Area Designations Alternative**
- ▶ **Alternative 3: Dense Cores Alternative**
- ▶ **Alternative 4: Zero Net Energy Buildings Alternative**

Further details on these alternatives, and an evaluation of their environmental effects relative to the environmental effects of the 2040 General Plan, are provided below.

6.5.1 Alternative 1: No Project-No General Plan Update

CEQA requires a No Project Alternative to be analyzed in the EIR. The No Project Alternative assumes that the 2040 General Plan would not be adopted or implemented. Under the “No Project” alternative the current 2005 General Plan land use map and the existing policies and programs would remain in effect. The land use map would be similar to the 2040 General Plan, but future development would be governed by the Existing Community and Urban land use designations in the existing General Plan, which do not provide clear guidance on allowable land use types (e.g., residential, commercial, industrial, mixed use) and do not set forth standards by land use type for maximum density or intensity of development, minimum lot size, or maximum lot coverage. The location and requirements of the Agricultural, Open Space, and Rural land use designations would be the same as the 2040 General Plan. This alternative assumes no change in market demand for housing types, commercial uses, or industrial development. Forecasted growth in population, housing units, and jobs in the unincorporated area by 2040 is assumed to be the same as under the 2040 General Plan.

COMPARISON OF SIGNIFICANT ENVIRONMENTAL EFFECTS

California law requires that every county and city adopt a general plan “for the physical development of the county or city, and of any land outside its boundaries which in the planning agency’s judgment bears relation to its planning” (Gov. Code, Section 65300). A general plan serves as the jurisdiction’s “constitution” or “blueprint” for future decisions concerning a variety of issues including land use, health and safety, and resource conservation. All area plans, specific plans, subdivisions, public works projects, and zoning decisions must be consistent with the direction provided in the County’s general plan.

Because the land use plans are substantially similar between the 2040 General Plan and No Project Alternative, potential adverse environmental impacts of development under each alternative would tend to be similar both in type and severity. This would include impacts to agricultural and forestry resources, geology and soils, noise and vibration, population and housing; and public services and recreation. In many cases, federal, state, and local regulations would reduce the potential for adverse environmental impacts. In addition, site-specific evaluations would be necessary to determine the extent to which impacts occur and the level of mitigation necessary to reduce significant environmental effects, using the appropriate level of CEQA review. The identification of environmental impacts and appropriate mitigation measures is subject to the discretion of the Ventura County Board of Supervisors, Planning Commission or Planning Director, depending on the permit type and decision-making authority.

There are also several new and revised policies and implementation programs included in the 2040 General Plan that would be more protective of the environment than the under the No Project Alternative. The new policies are primarily included in the GHG Strategy, which is intended to function as a stand-alone GHG emissions reduction plan or “Climate Action Plan” (CAP). These policies would primarily affect issues related to air quality, greenhouse gases, energy, and vehicle miles traveled (VMT) as follows.

- ▶ Decreased GHG emissions from current levels by 2040 through responses to legislation, state regulations and the implementation of GHG reducing policies and programs integrated into the plan.
- ▶ Integration of policies and programs to support carbon dioxide sequestration and reduced risk of major wildfires.
- ▶ Encouragement of efficient land use patterns and alternative transportation, zero-net energy buildings, encouragement of electric- or renewable-powered agricultural equipment.
- ▶ VMT reduction through providing transit alternatives, innovative shared transportation model, and expansion of bicycle and pedestrian networks.
- ▶ Reduced gas and diesel fuels consumption in the transportation sector by working to reduce VMT and providing the charging infrastructure needed for increased levels of electric vehicle adoption.
- ▶ Promote installation of electric vehicle charging equipment to support a transition to the broader adoption of zero emission vehicles which be used in place of gasoline and diesel consumption.

Based on these key differences, effects on air quality, energy, and greenhouse gases and climate change would be more severe under the No Project Alternative than with implementation of the 2040 General Plan. Resource areas where effects would be the same or slightly more severe under the No Project Alternative because 2040 General Plan policies protective of resources would not be implemented include:

- ▶ Aesthetics, where new plan area-wide policies that preserve visual impacts from reservoirs, open space character, ridgelines and mountain views would not be included.
- ▶ Cultural, tribal cultural, and paleontological resources, where new plan area-wide policies that preserve historical landmarks, require discretionary development be assessed for potential resources, and encourage discretionary development to incorporate architectural designs and features that reflect the historical and cultural and reuse historic structures would not be included.
- ▶ Biological resources, which would not include new policies related to consideration of sensitive biological resources, protections for hillsides and riparian areas, preservation of open space, and proactive steps to address saltwater intrusion.
- ▶ Hazards and hazardous materials, which would not include various new policies designed to address wildfire hazards.
- ▶ Hydrology and water quality, where new policies to consider the preservation of natural riparian habitats and groundwater recharge in design of flood protection solutions and stormwater drainage facilities would not be included.
- ▶ Land use and planning, which would not include policies that ensure land use patterns emphasize efficient use of land and infrastructure, walkable neighborhoods, contemporary development practices, and sense of place; encouraging mixed-use and live-work development, multimodal access to commercial development, and protections for disadvantaged communities.
- ▶ Transportation and traffic, because there would not be multiple policies in place that promote the safe and efficient operating conditions for movement of people and goods, and emergency services, regional transportation planning, land use patterns that reduce reliance on single-passenger automobile trips, improve transportation system connectivity, provisions for complete streets and the safety of pedestrians and bicyclists, and the use of emerging technologies and environmentally-sustainable practices to increase transportation system efficiency and resiliency.
- ▶ Utilities and service systems, where new policies related to onsite water reuse, reclaimed water, water use efficiency, groundwater recharge, and solid waste reduction and agricultural waste reuse would not be included.

Conversely, the effects on access to petroleum resources would be reduced under the No Project Alternative, which would not include the siting and operational restrictions on new discretionary oil and gas wells that are proposed in the 2040 General Plan.

Overall, because the No Project Alternative would not contain these other policies and programs that are protective of the environment and included in the 2040 General Plan, it would be less environmentally protective compared to the 2040 General Plan.

CONSISTENCY WITH PROJECT OBJECTIVES

The No Project Alternative would attain most of the project objectives because the goals and policies under the 2005 General Plan are largely reflective of the Guiding Principles contained in Section 1.2 of the 2040 General Plan. However, the No Project Alternative may not be consistent with the stated objectives related to Public Facilities, Services, and Infrastructure (invest in facilities, infrastructure, and services, including renewable energy, to promote efficiency and economic vitality, ensure public safety, and improve quality of life) and Climate Change and Resilience (reduce greenhouse gas emissions to achieve all adopted targets, proactively anticipate and mitigate the impacts of climate change, promote employment opportunities in renewable energy and reducing greenhouse gases, and increase resilience to the effects of climate change). It is important to note that the No Project Alternative does not address topics and issues pursuant to state requirements that have been adopted since the existing general plan (No Project Alternative) was approved in 2005. These include environmental justice, transportation issues such as assessing VMT and analyzing transportation systems more holistically (e.g., “Complete Streets”), and wildfire hazards. In addition, the No Project Alternative does not include a CAP which, among other things, would include a vulnerability analysis and describe how the County plans to reduce greenhouse gas emissions and adapt to a changing climate.

6.5.2 Alternative 2: Existing Community and Urban Area Designations Alternative

The Existing Community and Urban Area Designations Alternative would include the same policies and implementation programs as the 2040 General Plan evaluated in this draft EIR but would revise the land use diagram to encourage more compact development patterns in the county and create additional opportunities for construction of attached and multi-family housing units, as discussed further below. The mitigation measures identified for the 2040 General Plan would also be applied to this alternative, where relevant and appropriate given the potential for reduced effects in some resource areas.

The Agriculture, Open Space, and Rural land use designations of this alternative would be the same as under the 2040 General Plan. Approximately 98 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent), Agriculture (approximately 9 percent), or Rural (approximately 1 percent) land uses. Also as with the 2040 General Plan, future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses would continue to be concentrated within the Existing Community area designation (boundary) and the Urban area designation (boundary), generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101 (refer to Figure 3-3 in Chapter 3, “Project Description”). The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county.

However, the land use diagram of this alternative would be different from the 2040 General Plan in the following ways. Very Low Density or Low Density Residential lands outside of the Existing Community area designation (boundary) and Urban area designation (boundary) would remain the same as under the 2040 General Plan. Very Low Density or Low Density Residential lands located within the Existing Community area designation (boundary) and Urban area designation (boundary) would be designated as Medium-Density Residential or Residential High-Density.

Additional land would also be designated for commercial and/or mixed use development within these areas to complement the Medium-Density Residential and Residential High-Density designations. Accompanying such re-designations in the land use diagram would also be necessary changes in the zoning designations and minimum parcel sizes (suffices in the Zoning Compatibility Matrix) as well as updates to the development standards to ensure increases in lot coverages, reduced setbacks and parking requirements, increased building heights to a maximum of 45 or 50 feet to accommodate a minimum of 3-story development (such as podium parking with two-stories residential above) in order to allow the county to accommodate the same amount of forecasted growth as the 2040 General Plan within more compact areas.

In addition, this alternative would employ policy incentives and disincentives to focus future population, housing, and employment growth within the Urban and Existing Community area designations. The types of policies and programs that would be created or revised to focus development within these areas would include changing development impact fees, parking standards, and permitting timelines. County investments in new or upgraded public infrastructure and other public expenditures would be prioritized within Urban and Existing Community area designations and limited elsewhere. This alternative could also include use of a transfer of development rights programs in which land owners outside of Urban and Existing Community area designations would be compensated for redirecting their development rights to land within these areas.

This alternative would also include policies, programs, and investments to achieve community design and infrastructure within Urban and Existing Community area designations that leads to substantial increases in walking, biking, and public transit for all trips and greatly decreases trips made by vehicle to achieve major reductions in the rate of VMT. Examples of policies, programs, and investments include pricing for vehicle parking; providing protected bike lanes, walkways, and other dedicated right of way for people walking and biking; decreasing the number of travel lanes on existing roadways and highways, and repurposing that space for public transit, biking, and/or walking; eliminating vehicle parking in the public right of way; providing dedicated right of way for public transit vehicles; subsidizing neighborhood or community-level shuttle services; support for mobility services like rideshare, carshare, and bikeshare; and building and urban design that is oriented to people and use of the public realm and not the automobile.

Overall population growth, housing, and employment projections for this alternative would be the same as under the 2040 General Plan. The lands within the Existing Community area designation (boundary) and Urban area designation (boundary) would become highly urbanized communities featuring high density and intensity development that create substantial additional opportunities to accommodate new housing units and commercial, office, and mixed-use land uses, which in turn would result in substantially higher rates of population and job growth within these area designations relative to the 2040 General Plan.

COMPARISON OF SIGNIFICANT ENVIRONMENTAL EFFECTS

This alternative would focus new development (e.g., more housing units, increase commercial square footage) anticipated to result from population growth that is forecast to occur over the life of the 2040 General Plan within a smaller disturbance footprint. As a result, the effects of development associated with ground disturbance would decrease relative to the 2040 General

Plan, although short-term construction-related impacts associated with proximity to sensitive receptors may increase. This could result in impacts related to air quality during construction and increase the potential for construction-related noise and vibration near existing and proposed receptors. Construction in more urban areas is also more likely to occur where there are documented or undocumented hazardous materials releases that could complicate development, however this would be addressed through compliance with existing regulations. This pattern of development would also be more likely to displace existing housing than the 2040 General Plan. These effects of the Existing Community and Urban Area Designations Alternative would be more severe than with the 2040 General Plan. Conversely, by reducing the areas where development would be anticipated to occur, this alternative would reduce the potential for impacts associated with ground disturbance, including overall release of harmful air emissions; effects on Important Farmland, habitats, sensitive communities, migration corridors, and special-status species; potential to encounter tribal, cultural, and paleontological resources; access to petroleum resources, as compared to the 2040 General Plan.

This alternative also preserves open space and the scenic character of the portions of the plan area outside of the Existing Community and Urban area designations but may place greater pressure on features within these areas, including historical resources. Alternative 2 would create an aesthetic dichotomy in the county whereby the areas in and around land designated as Existing Community or Urban would experience notable change in the character of the communities and the areas outside of these urban centers would experience very low growth and potential for change to the aesthetics. However, this growth pattern may also reduce the potential for effects on scenic resources and scenic vistas and may reduce the effect of new sources of light and glare in Agricultural, Open Space, and Rural land use designations. Because this alternative would concentrate population in specific areas, it would be also expected to result in additional demand for public services and utilities infrastructure, and the impacts of constructing or expanding such infrastructure may result in additional significant construction impacts. Because overall forecasted growth would be the same as the 2040 General Plan the impact of this alternative on water supply would be similar.

At buildout, the land use plan of this alternative would reduce VMT and associated GHG emissions. Its compact form and integration of land uses would reduce the number and length of single occupancy vehicle trips, and support notable increases in walking, biking, use of public transit, and other alternatives to driving alone. The new development would also be required to meet modern building standards and achieve compliance with the general plan policies intended to reduce energy use in new development. With the compact development pattern, this alternative would be more likely to expose new and existing sensitive uses to unacceptable levels of traffic noise than the 2040 General Plan. However, it would also reduce development in fire hazard areas and the potential for exacerbation of wildfire risk. Adverse effects related to wildfire and post-wildfire conditions also would be reduced under this alternative.

CONSISTENCY WITH PROJECT OBJECTIVES

The Existing Community and Urban Area Designations Alternative would be consistent with all of the objectives established for the 2040 General Plan.

6.5.3 Alternative 3: Dense Cores Alternative

This alternative would build on the Existing Community and Urban Area Designations Alternative. It would retain the same incentive and disincentive programs to promote higher-density, mixed use development within the boundaries of the Existing Community and Urban area designations, but would further refine the areas in which growth would be encouraged to the following: only areas within Existing Community and Urban area designations that are contiguous with incorporated cities along the Highway 101 corridor (i.e., areas within Existing Community and Urban area designations that are adjacent to the cities of Ventura, Oxnard, Camarillo, and Thousand Oaks). The county's forecasted population, housing, and job growth would be accommodated within these areas by revising the land use diagram to provide appropriate medium and high-density residential designations and non-residential designations (e.g., mixed use, commercial, industrial). These areas were identified because they are near established infrastructure and Highway 101, which is a key regional transportation corridor.

COMPARISON OF SIGNIFICANT ENVIRONMENTAL EFFECTS

The Dense Cores Alternative would focus new urban development within the 8,274 acres of land that is currently designated Existing Community (6,991 acres) or Urban (1,283 acres) and is adjacent to a city that has direct access Highway 101. This is approximately 55 percent of the area identified for growth under the Existing Community and Urban Area Designation Alternative described above. As such, the effects of general plan implementation that are directly linked to ground disturbance would be further reduced under this alternative. Conversely, the effects of infill development, including displacement of housing, and short- and long-term air quality and noise impacts to sensitive receptors, could increase.

As described above for the Existing Community and Urban Area Designation Alternative, by reducing the areas where development would be anticipated to occur, Alternative 3 would reduce the potential for impacts associated with ground disturbance, including overall release of harmful air emissions; effects on Important Farmland, habitats, sensitive communities, migration corridors, and special-status species; potential to encounter tribal, cultural, and paleontological resources; and access to petroleum resource, as compared to the 2040 General Plan. This alternative would also preserve open space and the scenic character of the portions of the plan area outside of the Existing Community and Urban area designations associated with four cities identified along Highway 101.

At buildout, the land use plan of this alternative would also reduce VMT and associated GHG emissions relative to the 2040 General Plan. The compact form and integration of land uses would reduce the number and length of single occupancy vehicle trips, and support notable increases in walking, biking, use of public transit, and other alternatives to driving. Ventura County Transportation Commission provides bus service between the cities of Ventura and Thousand Oaks, which could serve the Dense Core Alternative. The new development would also be required to meet modern building standards and achieve compliance with the general plan policies intended to reduce energy use in new development.

This alternative would result in concentrated urbanization that could result in changes to the character of the affected areas. New development would concentrate construction-related air quality, noise and vibration effects near existing and proposed receptors in these limited areas.

With the compact development pattern, this alternative would be more likely to expose new and existing sensitive uses to unacceptable levels of traffic noise than the 2040 General Plan. This pattern of development would also be more likely to displace existing housing than the 2040 General Plan. Further, due to proximity to established cities, this alternative could disproportionately draw upon the resources of these cities, resulting in impacts to public facilities and infrastructure in these areas. The overall impact on public utilities and services would be similar to the 2040 General Plan, however, because the same amount of growth is anticipated to occur and providing these services in discrete, compact areas may be more efficient.

For the reasons provided above, this alternative would be anticipated to reduce the impacts of the plan related to agriculture and forestry, energy, and greenhouse gases and climate change. Hazards and hazardous materials impacts would be addressed through regulatory compliance and would be similar to the 2040 General Plan, but wildfire impacts would be less under Alternative 3 due to the reduced development in the wildland-urban interface. Other effects, such as those related to aesthetics; hydrology and water quality; transportation and traffic, biological resources; and mineral and petroleum resources would be reduced for most of the plan area but intensified in the dense cores. Overall impacts to these resource areas would also be reduced.

CONSISTENCY WITH PROJECT OBJECTIVES

The Dense Cores Alternative would be consistent with all of the objectives established for the 2040 General Plan.

6.5.4 Alternative 4: Zero Net Energy Buildings Alternative

The Zero Net Energy Buildings Alternative would include the same policies, implementation programs, and land use diagram as the 2040 General Plan evaluated in this draft EIR. The alternative would also include policies and implementation programs designed to reduce energy consumed in buildings. The mitigation measures identified for the 2040 General Plan would also be applied to this alternative, where relevant and appropriate given the potential for reduced effects in some resource areas.

Zero net energy (ZNE) means that the total amount of energy consumed by a building on an annual basis is equal to the amount of renewable energy generated by the building (or on the site). The Zero Net Energy Buildings Alternative would employ a three-pronged approach to address the energy consumption of the built environment and achieve greater GHG reductions than the 2040 General Plan, which would result in increased progress toward meeting the State's 2030 GHG reduction of 40 percent below 1990 levels. This alternative would include the same policies and programs and land use diagram as the 2040 General Plan but would also include: 1) a ZNE requirement for new construction, 2) a program to retrofit County-owned buildings to ZNE performance, and 3) an incentive program that encourages the retrofitting of privately-held buildings to ZNE, or near ZNE performance through energy efficiency upgrades, on-site renewable energy generation and appliance replacements. The retrofit actions would be designed to achieve ZNE performance for the County's existing building stock by 2040. As described above, while these measures may be possible from a technological standpoint, the County does not have the legal authority to require improvements to existing homes and businesses.

Existing buildings account for the majority of GHG emissions in the County and this will remain the case given that the pace of new construction is forecast to be a small portion of the County's overall building stock. New buildings are also vastly more energy efficient than older buildings of the same type due to compliance with state-mandated building codes.

To achieve major participation in the retrofitting of existing buildings to ZNE performance several measures could be deployed by the County, including subsidies or incentive programs, large-scale public information campaigns and partnerships with other public agencies, community groups, non-profit organizations, and others. Further, revenue sources from the County, State or other private sources would need to be established to fund these programs. Incentives or subsidies for property owners would be designed to reduce energy consumption through the retrofitting of appliances, windows, insulation, and lighting and deployment of on-site renewable energy generation and storage systems. Adopting ordinances to require energy efficiency or on-site renewable energy system improvements could be aimed at specified trigger points, such as the point-of-sale or during application for major building renovations. Measures to achieve ZNE for new buildings could include adopting an ordinance requiring ZNE for all new buildings, both commercial and residential.

COMPARISON OF SIGNIFICANT ENVIRONMENTAL EFFECTS

With the relatively low growth forecasted in the county through 2040, building emissions would account for only a small fraction of the County's greenhouse gas inventory and forecasts; most emissions are associated with passenger vehicle travel. As indicated in Section 4.8, "Greenhouse Gas Emissions," all new residential construction would be all-electric, paired with on-site renewable energy by 2030 through adoption of Implementation Program COS-S, and performance based green building standards would be incorporated into new commercial and residential buildings under COS-R. These programs would achieve GHG reductions by enhancing energy efficiency of new residential and commercial construction beyond the standard Title 24 building code. In comparison a ZNE building alternative would set a more stringent, quantifiable performance target that requires newly constructed buildings to reduce energy consumption to the lowest feasible levels using market available building products and technologies. Applying this ZNE standard to existing commercial and residential buildings owned by the County and private parties would require major investments in energy efficiency and renewable energy. GHG emissions associated with new construction would be reduced under this measure. It would also address the existing building stock which is the largest contributor to Building Energy GHG emissions in the County's inventory and forecasting. Therefore, this alternative would help the County achieve the state's 2030 goals for GHG reduction. This alternative could have a beneficial effect on the calculation of GHG emissions. Effects on other resources, including agricultural and forestry resources; cultural, tribal cultural, and paleontological resources; hydrology and water quality; transportation and traffic; biological resources; and mineral and petroleum resources would be the same as those identified for the 2040 General Plan.

CONSISTENCY WITH PROJECT OBJECTIVES

The Zero Net Energy Buildings Alternative would be consistent with all of the objectives established for the 2040 General Plan.

6.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6-1 provides a qualitative summary of the environmental effects of the alternatives evaluated above in comparison to the effects of the 2040 General Plan to identify the environmentally superior alternative. As summarized in Table 6-1, the No Project Alternative is not environmentally superior. In fact, in those resource areas where significant and unavoidable impacts are identified for the 2040 General Plan, the No Project Alternative would result in similar or greater effects.

Alternative 2 may reduce effects anticipated in the areas of agriculture and forestry resources; cultural, tribal cultural, and paleontological resources; biological resources; hydrology and water quality; greenhouse gases and climate change, and transportation and traffic. These are key areas of concern for the County and a reduction in significant effects could be a benefit to residents. However, this alternative could generate new impacts that may be significant in areas that are determined less than significant under the current plan, such as hazards and hazardous materials, population and housing, and noise and vibration. Due to the potential for effects on these resources, Alternative 2 is not considered environmentally superior to the 2040 General Plan.

Alternative 4 would result in similar impacts to the 2040 General Plan but would reduce impacts in a key area where the 2040 General Plan would result in significant and unavoidable impacts: greenhouse gas emissions. The reductions in these areas would be modest, however. As described above, building emissions would account for a relatively small fraction of the County's greenhouse gas inventory and forecast and the County's authority is limited. Therefore, although benefits may be realized related to greenhouse gas emission, impacts would be anticipated to remain significant and unavoidable.

Alternative 3 would reduce overall impacts in 11 of the 17 resource areas evaluated in this draft EIR by focusing the development anticipated to accommodate population growth in a manner that would limit effects on most of the county's character and aesthetics, reduce the area of potential ground disturbance and associated impacts to resources including agricultural, biological, cultural, and tribal cultural resources and construction air quality impacts, and promote compact development near transportation corridors, which result lower GHG emissions, lower VMT, lower air pollutant emissions, and reduced wildfire-related impacts. Therefore, the Dense Cores Alternative is the environmentally superior alternative.

Table 6-1 Summary Environmental Impacts of the Alternatives Relative to the 2040 General Plan

| Environmental Topic | 2040 General Plan | Alternative 1: No Project-No General Plan Update | Alternative 2: Existing Community and Urban Area Designations Alternative | Alternative 3: Dense Cores Alternative | Alternative 4: Zero Net Energy Buildings Alternative |
|--|--------------------------|---|--|---|---|
| Aesthetics | LTS* | Slightly Greater | Similar | Slightly Less | Similar |
| Agriculture and Forestry Resources | SU | Similar | Slightly Less | Less | Similar |
| Air Quality | SU | Greater | Similar | Slightly Less | Less |
| Cultural, Tribal Cultural, and Paleontological Resources | SU | Slightly Greater | Slightly Less | Less | Similar |
| Biological Resources | SU | Slightly Greater | Less | Less | Similar |
| Energy | LTS | Greater | Similar | Slightly less | Less |
| Geology and Soils | LTS | Similar | Similar | Similar | Similar |
| Greenhouse Gas Emissions | SU | Greater | Less | Less | Less |
| Hazards, Hazardous Materials and Wildfire | SU | Greater | Less | Less | Similar |
| Hydrology and Water Quality | LTS | Slightly Greater | Slightly Less | Slightly Less | Similar |
| Land Use and Planning | LTS | Slightly Greater | Similar | Similar | Similar |
| Mineral and Petroleum Resources | SU | Less | Similar | Slightly Less | Similar |
| Noise and Vibration | SU | Similar | Slightly Greater | Slightly Greater | Similar |
| Population and Housing | LTS | Similar | Slightly Greater | Slightly Greater | Similar |
| Public Services and Recreation | SU | Similar | Similar | Similar | Similar |
| Transportation and Traffic | SU | Greater | Less | Less | Similar |
| Utilities | SU | Similar | Similar | Similar | Similar |

SU = significant and unavoidable impacts

LTS = less-than-significant impacts

LTS* = impacts that can be reduced to a less-than-significant level through new or revised policies and programs