

ADDENDUM NO. 1

VENTURA COUNTY 2040 GENERAL PLAN ENVIRONMENTAL IMPACT REPORT (SCH No. 2019011026)



Prepared by:

**County of Ventura
November 15, 2023**

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CHAPTER 1 INTRODUCTION

This Addendum evaluates the environmental effects of proposed amendments (the “Project”) to the County of Ventura (“County”) 2040 General Plan (the “2040 General Plan” or “Plan”) Policies COS-7.7 and COS-7-8. The proposed amendments add to these policies certain mitigation provisions for mineral resource impacts that were included in the Final EIR for the Plan, but not included in the Plan itself. These changes are being considered pursuant to a settlement of several lawsuits that challenged the adoption of the Plan.

This document has been prepared in accordance with the California Environmental Quality Act (“CEQA”) (Public Resources Code [PRC] Section 21000 *et seq.*) and its implementing guidelines (“CEQA Guidelines”) (California Code of Regulations Title 14, Section 15000 *et seq.*). The County is the CEQA Lead Agency for this Project.

The proposed Project is described in detail in **Chapter 2 Project Description**.

1.1 Document Format

This Addendum contains five chapters. **Chapter 1 Introduction** provides an overview of the project history and previous environmental analysis, confirms the action triggering the Addendum, and outlines the document format. **Chapter 2 Project Description** provides a detailed description of the proposed Project. **Chapter 3 Addendum Applicability and Scope** discusses the purpose and need for the Addendum, identifies the public review conducted for the document, and confirms the scope of the evaluation completed under the Addendum. **Chapter 4 Impact Evaluation** presents the comparative evaluation checklist for the applicable impact areas and includes a brief discussion of the outcomes of the analyses. **Chapter 5 Primary Documents Reviewed and References** lists primary documents reviewed and reference documents for this Addendum.

1.2 Project History and Previous Environmental Analysis

On September 15, 2020, the County Board of Supervisors (the “Board”) adopted the 2040 General Plan. The Plan is a long-range plan that reflects the County’s vision for the future, provides direction through the year 2040 on growth and development, and is an expression of the quality of life in Ventura County.

The Plan includes a Conservation and Open Space Element, which focuses on the long-term preservation and conservation of both unincorporated Ventura County’s natural and developed open space environment. Within the Conservation and Open Space Element, Goal COS-7 establishes the County’s goal to effectively and safely manage the exploration, production, and drilling of oil and gas resources in unincorporated Ventura County. To guide County decision-makers in achieving this desired goal, the 2040 General Plan includes the following policies:

Policy COS-7.7. The County shall require new discretionary oil wells to use pipelines to convey oil and produced water; oil and produced water shall not be trucked.

Policy COS-7.8. The County shall require that gases emitted from all new discretionary oil and gas wells shall be collected and used or removed for sale or proper disposal. Flaring or venting shall only be allowed in cases of emergency or for testing purposes.

The County prepared an Environmental Impact Report (“EIR”) (SCH No. 2019011026) to assess the reasonably foreseeable and potentially significant adverse environmental effects that may occur from implementation of the 2040 General Plan. The County made the Draft EIR available for a 45-day public review period, starting January 13, 2020, and distributed it to responsible and trustee agencies, other affected agencies, surrounding counties, cities within Ventura County, and interested parties, as well as to all parties requesting a copy of the Draft EIR. The Final EIR identifies comments the County received from State and local agencies, organizations, and individuals during this public review period, provides written responses to these comments, and where applicable includes revisions to the Draft EIR. For those environmental topic areas which were found to have impacts that would be significant and unavoidable, the Board adopted the required Findings of Fact and Statement of Overriding Considerations (the “Statement of Overriding Considerations”). (CEQA Guidelines, § 15093.)

Section 4.12 of the EIR evaluated the potential effects of implementing the 2040 General Plan on mineral and petroleum resources, including the potential to 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 (Impact 4.12-4). The EIR determined that some oil operators may not be able to comply with requirements of Policies COS-7.7 and COS-7.8 in some locations due to the technological or economic infeasibility of installing the necessary infrastructure. Thus, the EIR concluded that Policies COS-7.7 and COS-7.8 could result in the loss of a known petroleum resource of value to the region, which would be a potentially significant impact.

Accordingly, the EIR proposed the following two mitigation measures to introduce some flexibility into these policies, consistent with the County’s existing zoning ordinances:

Mitigation Measure PR-2: Revised Policy COS-7.7: Limited Conveyance for Oil and Produced Water.

The County shall include the following revised policy in the 2040 General Plan.

Policy COS-7.7: Limited Conveyance for Oil and Produced Water. The County shall require new discretionary oil wells to use pipelines to convey crude oil and produced water, if feasible. ~~oil and produced water shall not be trucked.~~ Trucking of crude oil and produced water may only be allowed if the proponent demonstrates that conveying the oil and produced water via pipeline is infeasible. In addition, trucking of crude oil and produced water is allowed in cases of emergency and for testing purposes consistent with federal, state and local regulations.

Mitigation Measure PR-3: Revised Policy COS-7.8: Limited Gas Collection, Use, and Disposal.

The County shall include the following revised policy in the 2040 General Plan.

Revised Policy COS-7.8: Limited Gas Collection, Use, and Disposal. The County shall require that gases emitted from all new discretionary oil and gas wells be collected and used or removed for sale or proper disposal, if feasible. ~~Flaring or venting shall~~ may only be allowed if the proponent demonstrates that conducting operations without flaring or venting is infeasible. In addition, flaring or venting is allowed in cases of emergency and for testing purposes consistent with federal, State, and local regulations.

With implementation of these mitigation measures, the 2040 General Plan EIR found that impacts to loss of availability of a known petroleum resource that would be of value to the region and the residents of the state (Impact 4.12-4) would be less than significant.

The Board was tasked with weighing the importance of allowing access to local oil and gas resources with the known local environmental consequences of oil and gas production operations. In this case, the 2040 General Plan includes Policies COS-7.7 and COS-7.8 which, while benefitting the local environment by reducing impacts that may be caused by new oil and gas production, could also reduce access to local oil and gas resources, reduce the economic productivity on the oil and gas industry, and increase environmental impacts associated with increased importation of petroleum. In weighing these considerations in its Statement of Overriding Considerations, the Board found that Policies COS-7.7 and COS-7.8 could provide benefits to air quality, greenhouse gas emissions reductions, vehicle miles traveled, traffic safety, and to human health that outweigh their potential significant and unavoidable effects to mineral and petroleum resources and thus adopted these policies without mitigation. Because the recommended mitigation measures were not incorporated into the 2040 General Plan, the adopted CEQA Findings of Fact and Statement of Overriding Considerations listed loss of availability of a known petroleum resource that would be of value to the region and the residents of the state (Impact 4.12-4) as a significant and unavoidable impact.

In October 2020, a coalition of royalty owners, economic organizations, and oil industry petitioners (the “Petitioners”) filed petitions for writ of mandate and complaints for declaratory and injunctive relief challenging the County’s adoption of the 2040 General Plan, including challenges specific to Policies COS-7.7 and COS-7.8. The County and Petitioners have reached a settlement agreement, which includes the County’s agreement to consider amendments to Policies COS-7.7 and COS-7.8 to adopt the revisions that were proposed in Mitigation Measures PR-2 and PR-3, respectively (collectively, the “General Plan Amendments” or “Project,” as defined in Chapter 2 below).

1.3 Addendum Purpose

The County is proposing the General Plan Amendments, which would revise Policies COS-7.7 and COS-7.8 to adopt the revisions proposed in Mitigation Measures PR-2 and PR-3 of the certified Final EIR for the 2040 General Plan. This proposal is considered a “Project” under CEQA Guidelines Section 15378(a)(1) and is therefore subject to requirements of CEQA and the CEQA Guidelines. The County, as the Project proponent, is the designated Lead Agency under CEQA since it holds the primary authority to approve and carry out the General Plan Amendments.

CEQA Guidelines Section 15164 provides that a lead agency shall prepare an addendum to a previously certified EIR if only some changes or additions are necessary but none of the conditions described in Section 15162(a), calling for preparation of a subsequent EIR, have occurred. As this Addendum states in additional detail, the proposed General Plan Amendments do not result in the occurrence of any of the conditions found in Section 15162(a).

Section 15162(a) states that “when an EIR has been certified...for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - A. The project will have one or more significant impacts not discussed in the previous EIR or negative declaration;
 - B. Significant impacts previously examined will be substantially more severe than shown in the previous EIR;
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant impacts of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant impacts on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”

1.4 Determination

The proposed General Plan Amendments would revise Policies COS-7.7 and COS-7.8 to incorporate revisions to those policies that were recommended by Mitigation Measures PR-2 and PR-3 in the 2040 General Plan EIR. Because the proposed policy revisions that constitute the Project were already included as mitigation measures in the EIR, the Project requires no changes to the 2040 General Plan EIR.

The General Plan Amendments would not result in any new significant impact or substantial increase in the severity of a previously identified significant impact because the proposed policy changes were already recommended in the 2040 General Plan EIR. By adopting the mitigation measures recommended in the 2040 General Plan EIR, the General Plan Amendments would mitigate the significant and unavoidable impact to loss of availability of a known petroleum resource that would be of value to the region and the residents of the state (Impact 4.12-4), which was listed previously in the adopted CEQA Findings of Fact and Statement of Overriding Considerations. This impact would now be less than significant as described in the 2040 General Plan EIR. The 2040 General Plan EIR disclosed that Policies COS-7.7 and COS-7.8 as then proposed and eventually adopted would have beneficial impacts by reducing impacts that may be caused by new oil and gas production. The EIR also found that the policies could reduce access to local oil and gas resources, reduce the economic productivity of the oil and gas industry, and increase environmental impacts associated with increased importation of oil. The revisions to the policies recommended by Mitigation Measures PR-2 and PR-3 would continue to generally prohibit trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The revised policies would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 that were distinct from the significant impacts of the Plan.

There is no substantial change with respect to the circumstances under which the project is undertaken that would require substantial major revisions to the 2040 General Plan EIR due to the involvement of new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts. There is also no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the 2040 General Plan EIR was certified, showing that the project will result in a new or more severe environmental impact.

Nevertheless, the County has prepared this Addendum, in accordance with Section 15164 of the CEQA Guidelines, to evaluate potential impacts of the Project on limited resource areas implicated by Policies COS-7.7 and COS-7.8.

CHAPTER 2 PROJECT DESCRIPTION

This chapter provides a detailed description of the proposed Project.

2.1 Project Location

The Project proposes to amend 2040 General Plan Policies COS-7.7 and COS-7.8 to adopt the revisions proposed in Mitigation Measures PR-2 and PR-3 of the certified 2040 General Plan EIR. The proposed General Plan Amendments would apply to the Plan area as adopted, throughout the Ventura County boundary where the County has authority to regulate land use activities. The County has land use regulatory authority over most unincorporated land in the county, including land owned or managed by special districts (e.g., cemetery districts, water districts), subject to limited exceptions, but not including land owned or managed by the State or federal government (e.g., State parks, State universities, national parks, U.S. Bureau of Land Management areas, and tribal lands).

2.2 Project Description

Policies COS-7.7 and COS-7.8 established new restrictions¹ related to transportation and flaring for new oil and gas projects subject to discretionary action by the County. As currently adopted under the Plan, these policies state:

Policy COS-7.7. The County shall require new discretionary oil wells to use pipelines to convey oil and produced water; oil and produced water shall not be trucked.

Policy COS-7.8. The County shall require that gases emitted from all new discretionary oil and gas wells shall be collected and used or removed for sale or proper disposal. Flaring or venting shall only be allowed in cases of emergency or for testing purposes.

The 2040 General Plan EIR proposed Mitigation Measures PR-2 and PR-3, which the Board declined to adopt, to mitigate the potentially significant loss of a known petroleum resource of value to the region, which would result from some oil operators' inability to comply with the requirements of Policies COS-7.7 and

¹ The use of pipelines for the conveyance of crude oil and gas was already and remains required under the County's Zoning Ordinances, except when infeasible or impractical. (County Non-Coastal Zoning Ordinance § 8107-5.5.5(a) and Coastal Zoning Ordinance § 8175-5.7.7(e).) Similarly, piping gas off-site rather than flaring of gas was already and remains required under the County's Zoning Ordinances, unless the permit applicant can demonstrate that doing so would not be feasible or practicable. (County Non-Coastal Ordinance § 8107-5.5.7 and Coastal Zoning Ordinance § 8175-5.7.7(g).)

COS-7.8 in certain areas due to the technological or economic infeasibility. As proposed in the 2040 General Plan EIR, these policies state:

Mitigation Measure PR-2: Revised Policy COS-7.7: Limited Conveyance for Oil and Produced Water.

The County shall include the following revised policy in the 2040 General Plan.

Policy COS-7.7: Limited Conveyance for Oil and Produced Water. The County shall require new discretionary oil wells to use pipelines to convey crude oil and produced water, if feasible. ~~oil and produced water shall not be trucked.~~ Trucking of crude oil and produced water may only be allowed if the proponent demonstrates that conveying the oil and produced water via pipeline is infeasible. In addition, trucking of crude oil and produced water is allowed in cases of emergency and for testing purposes consistent with federal, state and local regulations.

Mitigation Measure PR-3: Revised Policy COS-7.8: Limited Gas Collection, Use, and Disposal.

The County shall include the following revised policy in the 2040 General Plan.

Revised Policy COS-7.8: Limited Gas Collection, Use, and Disposal. The County shall require that gases emitted from all new discretionary oil and gas wells be collected and used or removed for sale or proper disposal, if feasible. ~~Flaring or venting shall~~ may only be allowed if the proponent demonstrates that conducting operations without flaring or venting is infeasible. In addition, flaring or venting is allowed in cases of emergency and for testing purposes consistent with federal, State, and local regulations.

The Project proposes to amend Policies COS-7.7 and COS-7.8 to adopt the revisions proposed by Mitigation Measures PR-2 and PR-3 in the 2040 General Plan EIR, as follows:

Policy COS-7.7: Limited Conveyance for Oil and Produced Water. The County shall require new discretionary oil wells to use pipelines to convey crude oil and produced water, if feasible. Trucking of crude oil and produced water may only be allowed if the proponent demonstrates that conveying the oil and produced water via pipeline is infeasible. In addition, trucking of crude oil and produced water is allowed in cases of emergency and for testing purposes consistent with federal, state and local regulations.

Policy COS-7.8: Limited Gas Collection, Use, and Disposal. The County shall require that gases emitted from all new discretionary oil and gas wells be collected and used or removed for sale or proper disposal, if feasible. Flaring or venting may only be allowed if the proponent demonstrates that conducting operations without flaring or venting is infeasible. In addition, flaring or venting is allowed in cases of emergency and for testing purposes consistent with federal, State, and local regulations.

As defined in the 2040 General Plan, the term “feasible,” as used in these mitigation measures and proposed amended policies, means “capable of being accomplished in a successful manner within a reasonable period of time, taking in account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code § 21066.1) and the CEQA Guidelines (§15164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

Policy COS-7.7 would apply to the transport of oil and produced gas from the oil field, at the lease automatic custody transfer point, and not to the transport of oil and gas within the oil field where CalGEM has jurisdiction over the safety and integrity of pipelines.

2.3 Approvals Required

The Board has jurisdiction over the review and approval of the Project. The County Planning Commission would be requested to make a recommendation and the Board would be requested to take action on the following:

- Adoption of this Addendum to the 2040 General Plan EIR; and
- Approval of the proposed General Plan Amendments.

CHAPTER 3 CEQA ADDENDUM REVIEW AND SCOPE

This chapter discusses the purpose and need for the Addendum, identifies the public review conducted for the document, and confirms the scope of the evaluation completed under the Addendum.

3.1 Review and Action

This Addendum will be publicly released for review in conjunction with the public hearings regarding the Project before the Ventura County Planning Commission and Board of Supervisors. The County will consider this Addendum with the previously certified 2040 General Plan EIR before taking action on the Project pursuant to CEQA Guidelines Section 15164(d).

3.2 Scope of Evaluation

As summarized in Chapter 2 Project Description, the proposed revisions to Policies COS-7.7 and COS-7.8 would incorporate revisions to those policies recommended by Mitigation Measures PR-2 and PR-3 in the 2040 General Plan EIR.

The 2040 General Plan EIR disclosed that Policies COS-7.7 and COS-7.8 as then proposed and eventually adopted would have beneficial impacts by reducing impacts that may be caused by new oil and gas production. The EIR also found that the policies could reduce access to local oil and gas resources, reduce the economic productivity of the oil and gas industry, and increase environmental impacts associated with increased importation of oil. The revisions to the policies recommended by Mitigation Measures PR-2 and PR-3 would continue to generally prohibit trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The revised policies would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR found that implementation of Mitigation Measures PR-2 and PR-3 would result in a less than significant impact to loss of availability of a known petroleum resource that would be of value to the region and the residents of the state (Impact 4.12-4). The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

Because the recommended mitigation was not incorporated into the 2040 General Plan as originally adopted, the adopted CEQA Findings of Fact and Statement of Overriding Considerations listed loss of availability of a known petroleum resource that would be of value to the region and the residents of the state (Impact 4.12-4) as a significant and unavoidable impact. The proposed revisions to Policies COS-7.7 and COS-7.8 would incorporate the mitigation measures recommended in the 2040 General Plan EIR, thereby mitigating the significant and unavoidable impact listed in the adopted CEQA Findings of Fact and Statement of Overriding Considerations, such that this impact would be less than significant.

To the extent the proposed revisions to Policies COS-7.7 and COS-7.8 are considered a change, any impacts of this change are speculative. Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. It is unknown how many, if any, future applications will be

submitted and approved for new discretionary oil wells. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. There is no recent track record of discretionary applications on which any analysis or assumptions about future applications could be based, as there have been no discretionary applications for new discretionary wells in the last 8 years. The County Planning Department is not in receipt of any pending applications for a new discretionary oil well and Planning staff are not aware of any proposed applications that have not yet been submitted.

The 2040 General Plan EIR disclosed that, for existing active and idle oil wells, 472 wells are located outside of a two-mile radius of a major oil transmission line (compared to 3,545 wells located within two miles) and 1,331 wells are located outside of a two-mile radius of a major gas transmission pipeline (compared to 2,686 located within two miles). The 2040 General Plan EIR assumed that Policies COS-7.7 and COS-7.8 could effectively prohibit the development of new discretionary oil and gas wells outside of these two-mile radii and that other wells within the radii could also be prohibited. Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells, however, and not to existing operations. There is no basis to conclude that new discretionary oil and gas wells will be developed throughout unincorporated Ventura County at the same rate and overall level as prior historic development. This is especially true when no applications for new discretionary wells have been submitted to the County since 2015.

In addition, oil production in Ventura County has been declining, and was declining prior to the County's consideration of the 2040 General Plan. The General Plan Background Report found that oil production in Ventura County reached 9,121,781 barrels in 2015, which represented a 42 percent decrease in production from 1987 levels (15,659,398 barrels). According to the most recent annual report published by the State Department of Conservation, Geologic Energy Management Division (CalGEM) published on August 3, 2023, oil production in Ventura County in 2020 was 6,519,070 barrels. This represents a further decrease from 1987 and 2015 production levels (CalGEM, 2023).

Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

Although no changes are proposed to the 2040 General Plan EIR, as the Project proposes to incorporate mitigation that was recommended in the 2040 General Plan EIR, the County has decided to evaluate potential impacts of the Project on limited resource areas implicated by Policies COS-7.7 and COS-7.8. Therefore, the scope of evaluation completed under this Addendum has been limited to comparing the circumstances and potential impacts resulting from the Project with the circumstances and impacts discussed as part of the 2040 General Plan EIR and only for those resource areas where the 2040 General Plan EIR listed either Policy COS-7.7 or COS-7.8, or both, as related to the resource area.

CHAPTER 4 IMPACT EVALUATION

This impact evaluation provides the basis for determining whether the Project would have any significant environmental impacts that were not previously addressed in the certified 2040 General Plan EIR. The following comparative evaluation determines: (1) whether there are changed circumstances (i.e., circumstances, project changes, or new information of substantial importance) that may result in the conclusion of environmental impact significance different from those found in the 2040 General Plan EIR; and (2) whether any changes to adopted environmental commitments/mitigation measures or inclusion of additional mitigation measures are warranted or required.

As detailed in **Section 3.2 Scope of Evaluation**, this comparative evaluation and impact discussion is limited to the resource areas identified in the 2040 General Plan EIR as implicating Policies COS-7.7 and COS-7.8: Air Quality, Energy, Greenhouse Gas Emissions, Mineral Resources, and Transportation.

4.1 Explanation of Evaluation Categories

The comparative impact evaluation checklist in Section 4.2 includes the full range of questions for Air Quality, Energy, Greenhouse Gas Emission, Mineral Resources, and Transportation as presented in the current version of Appendix G of the CEQA Guidelines, with additional thresholds for Mineral and Petroleum Resources and Transportation and Traffic as presented in the County's adopted Initial Study Assessment Guidelines. The columns of the checklist have been modified from Appendix G to answer the questions required by Public Resources Code Section 21166 and CEQA Guidelines Section 15162, which apply to a project for which an EIR was previously certified. A "no" answer does not necessarily mean there are no potential impacts relative to the environmental category, but rather that there is no change in the condition or status of the impact as analyzed and addressed in the 2040 General Plan EIR. For example, the environmental categories might be answered with a "no" in the checklist because the impacts associated with the Project were adequately addressed in the 2040 General Plan EIR, and the conclusions about environmental impact significance from the 2040 General Plan EIR still apply. The purpose of each column of the checklist is described below.

Where Impact was Analyzed in Previous Analysis

This column provides a cross-reference to the pages of the 2040 General Plan EIR where information and analysis may be found relative to the environmental issue listed.

Policies that Reduce the Impact Identified in Previous Analysis

This column identifies the General Plan policies that were identified as reducing potential impacts in the 2040 General Plan EIR relative to the environmental issue listed.

New or More Significant Impacts?

Pursuant to CEQA Guidelines Section 15162(a)(2), this column indicates whether there are substantial changes in circumstances under which the Project is undertaken that have occurred subsequent to the certification of the 2040 General Plan EIR that would result in the Project having new significant environmental impacts that were not considered in the prior document or having substantial increases in the severity of previously identified significant impacts.

New Information Requiring Additional Analysis?

Pursuant to CEQA Guidelines Section 15162(a)(3)(A-D), this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the 2040 General Plan EIR was certified as complete is available, requiring an update to the analysis of the 2040 General Plan EIR to verify that the environmental conclusions and mitigation measures remain valid. If the new information shows that any of the following conclusions are met, the question would be answered “yes”, requiring the preparation of a subsequent EIR or supplement to the EIR: (A) the Project will have one or more significant effects not discussed in the 2040 General Plan EIR; (B) that significant effects previously examined will be substantially more severe than shown in the 2040 General Plan EIR; (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the mitigation measure or alternative is not adopted; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the 2040 General Plan EIR would substantially reduce one or more significant effects on the environment, but the mitigation measure or alternative is not adopted.

If the additional analyses completed as part of this comparative evaluation indicate that the conclusions of the 2040 General Plan EIR remain the same and no new significant impacts are identified, or identified significant environmental impacts are not found to be substantially more severe, the question would be answered “no” and no additional EIR documentation (subsequent EIR or supplement to the EIR) would be required.

Any Change in Prior Impact Conclusion?

This column indicates whether the conclusions in the 2040 General Plan EIR remain valid. A “yes” response will be provided if there is a change to the impact conclusion in the 2040 General Plan EIR. A “no” response will be provided if there is no change to the impact conclusion and the conclusions in the 2040 General Plan EIR remain valid.

4.2 Comparative Impact Evaluation Checklist

4.2.1 Air Quality

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
a) Conflict with or obstruct implementation or the applicable air quality plan?	Draft EIR Impact 4.3-1, pages 4.3-11 to 4.3-12, and Cumulative Impacts, pages 5-7 to 5-8	CTM-2.1 through CTM -2.25 CTM-3.1 CTM-4.1 CTM-4.2 CTM-4.3 HAZ-10.2	No	No	No, impact remains less than significant.

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
	<p>Final EIR Revisions to Table 2.4, page 3-5 and Revisions to Section 4.3: Air Quality, pages 3-53 to 3-58.</p> <p>Existing environmental conditions described in the January 2020 Background Report, Section 8.1.</p>	HAZ-10.3			
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under the applicable federal or state ambient air quality standard?	<p>Draft EIR Impacts 4.3-2 and 4.3-3; pages 4.3-12 to 4.3-19.</p> <p>Final EIR Revisions to Table 2.4, pages 3-5 to 3-9 and Revisions to Section 4.3: Air Quality, pages 3-53 to 3-58.</p> <p>Existing environmental conditions described in the January 2020</p>	<p><u>Impact 4.3-2</u></p> <p>COS-8.7 HAZ-10.3 HAZ-13 HAZ-14</p> <p><u>Impact 4.3-3</u></p> <p>COS-7.7 (including recommended mitigation) COS-7.8 (including recommended mitigation) CTM-2.11 CTM-2.13 CTM-3.1 CTM-4.1</p>	No	No	No, impacts remain significant and unavoidable.

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
	Background Report, Section 8.1.	CTM-4.2 CTM-6.1 HAZ-10.5 HAZ-10.6 HAZ-10.12			
c) Expose sensitive receptors to substantial pollutant concentrations?	<p>Draft EIR Impacts 4.3-4 and 4.3-5; pages 4.3-19 to 4.3-23.</p> <p>Final EIR Revisions to Table 2.4, pages 3-9 to 3-10 and Revisions to Section 4.3: Air Quality, pages 3-53 to 3-58.</p> <p>Existing environmental conditions described in the January 2020 Background Report, Section 8.1.</p>	<p><u>Impact 4.3-4</u></p> <p>None</p> <p><u>Impact 4.3-5</u></p> <p>HAZ-10.3 HAZ-10.5 HAZ-10.11 HAZ-10.12 HAZ-10.15 LU-17.2 LU-17.4 LU-17.5 COS-7.2</p>	No	No	No, impacts remain less than significant.
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial	<p>Draft EIR Impact 4.3-6; pages 4.3-23 to 4.3-24.</p> <p>Final EIR, Revisions to Table 2.4,</p>	AG-2	No	No	No, impact remains less than significant.

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
number of people?	<p>page 3-10 and Revisions to Section 4.3: Air Quality, pages 3-53 to 3-58.</p> <p>Existing environmental conditions described in the January 2020 Background Report, Section 8.1.</p>				

Impact Assessment

a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Impact 4.3-1 of the 2040 General Plan EIR evaluated whether the 2040 General Plan would conflict with or obstruct implementation of the 2016 Ventura County Air Quality Management Plan (“2016 AQMP”). The analysis described that Ventura County is nonattainment for ozone with respect to the California Ambient Air Quality Standards and the 2016 AQMP ozone control strategy includes stationary source and transportation control measures, conformity with federal regulations, the State Mobile Source Strategy, reasonably available control measures, incentives, and smart growth policies and programs to reach ozone attainment goals. Stationary source control measures, including vapor collection systems on gasoline and oil tanks, are included in rules adopted by the Ventura County Air Pollution Control District (“VCACPD”).

The 2040 General Plan EIR determined that multiple 2040 General Plan Policies ensure consistency with the ozone strategy in the 2016 AQMP, including Policies HAZ-10.2 and HAZ-10.3 (prohibiting discretionary development inconsistent with the AQMP and VCAPCD rules and permit requirements) and Policies CTM-4.2, CTM-2.1 through CTM-2.25, CTM-3.1 through CTM-3.8, and CTM-4.1 and CTM-4.3 (reducing vehicle trips by increasing the availability of alternative modes, accommodating infrastructure for walking and biking, and increasing vehicle occupancy). The 2040 General Plan EIR also determined that population estimates under the 2040 General Plan would be less than the population estimates in the 2016 AQMP. Accordingly, the 2040 General Plan EIR determined that the 2040 General Plan would not conflict with or obstruct implementation of the 2016 AQMP and therefore impacts would be less than significant.

The Project proposes no changes to the General Plan policies cited in the 2040 General Plan EIR as ensuring consistency with the ozone strategy in the 2016 AQMP and would not result in an increase in population growth that would result in a conflict with the AQMP. Further, the Project will incorporate

revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR and thus no revisions to the 2040 General Plan EIR are necessary.

The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

Finally, on December 13, 2022, the VCAPCD adopted the 2022 Air Quality Management Plan ("2022 AQMP"). The United States Environmental Protection Agency published a notice of proposed rulemaking on July 14, 2022, determining that Ventura County attained the 2008 federal 8-hour ozone standard evaluated in the 2016 AQMP standard by its July 20, 2021 attainment date. The 2022 AQMP presents a combined state and local strategy for attaining the 2015 federal 8-hour ozone standard, the only federal clean air standard Ventura County does not meet, by the statutory compliance deadline of August 3, 2027.

Policies HAZ-10.2, HAZ-10.3, CTM-2.1 through CTM-2.25, CTM-3.1 through CTM-3.8, and CTM-4.1 through CTM-4.3 will ensure consistency with the ozone reduction strategies of the 2022 AQMP, same as with the 2016 AQMP. The Project proposes no changes to these policies and would not result in any population increase that would increase impacts assumed in the 2022 AQMP. Therefore, the Project would not conflict with or obstruct implementation of the 2022 AQMP and the adoption of the 2022 AQMP is not new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

- b) Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under the applicable federal or state ambient air quality standard?**

Impact 4.3-2 of the 2040 General Plan EIR evaluated whether implementation of the 2040 General Plan would cause construction-related criteria air pollutants or precursor emissions that exceed VCAPCD thresholds. The VCAPCD has not adopted construction-related criteria emissions thresholds. Instead, the District recommends mitigating construction emissions from heavy-duty off-road equipment if these emissions exceed the operational thresholds. The analysis in the 2040 General Plan EIR described that development allowed under the 2040 General Plan, including potential construction of new oil pipelines associated with proposed Policy COS-7.7, would generate construction-related emissions of criteria air pollutants and precursors. Based on modeling, the 2040 General Plan EIR determined that construction activity would exceed the VCAPCD operational NO_x emissions threshold for the County and the Ojai Valley and the reactive organic gas (ROG) threshold for the Ojai Valley.

Further, the 2040 General Plan EIR found that construction activities could contribute to the County's nonattainment status for ozone and PM₁₀, which could result in an increase in potential for adverse health impacts, including coughing, pulmonary distress, lung inflammation, shortness of breath, and permanent lung impairment. The analysis determined that proposed General Plan Policy HAZ-10.3 (compliance with VCAPCD rules) and Policy COS-8.7 (reduced energy use for construction) and VCAPCD Rules 50 (opacity), 51 (nuisance), and 55 (fugitive dust) would reduce construction emissions but would not guarantee that emissions from individual projects would be reduced below VCAPCD operational thresholds. The 2040 General Plan EIR imposed Mitigation Measures AQ-1a, AQ-1b, AQ-2a, and AQ 2b to reduce this potentially significant impact, but found that even with mitigation this impact would be significant and unavoidable.

Impact 4.3-3 of the 2040 General Plan EIR evaluated whether implementation of the 2040 General Plan would result in a net increase in long-term operational criteria air pollutant and precursor emissions that exceed VCAPCD thresholds. The analysis in the 2040 General Plan EIR found that future development and other physical changes that could occur under the 2040 General Plan would result in long-term operational emissions of ROG, NO_x, PM₁₀, and PM_{2.5}. Those emissions would exceed VCAPCD thresholds for ROG and NO_x, both Countywide and in the Ojai Valley, which could exacerbate health complications associated with ozone and PM₁₀ exposure to nearby sensitive receptors. The analysis specifically described Policies COS-7.7 and COS-7.8, including the mitigation recommended in the 2040 General Plan EIR, and found that the policies would avoid air pollutant emissions that would otherwise result from trucking of oil and produced water and flaring of emitted gases associated with new discretionary oil wells. The 2040 General Plan EIR concluded that multiple policies in the 2040 General Plan would reduce criteria air pollutant and precursor emissions, including Policies HAZ-10.6, CTM-2.11, CTM-4.1, CTM-4.2, CTM-6.1, COS-7.7, and COS-7.8, but the County is non-attainment for ozone and PM₁₀ and future development under the 2040 General Plan could contribute to the non-attainment status. While individual projects may be able to reduce emissions to levels below applicable thresholds, the total emissions attributable to future development would exceed VCAPCD thresholds and would be a considerable contribution to cumulative air pollutants in the region. The impact therefore remained significant and unavoidable.

The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The analysis for this impact for operational emissions specifically references the analysis of 2040 General Plan EIR analysis for Mineral and Petroleum Resources, which included the proposed revisions to Policies COS-7.7 and COS-7.8. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project)

that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, the Project would not result in substantially more severe impacts compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

c) Would the Project expose sensitive receptors to substantial pollutant concentrations?

Impact 4.3-4 of the 2040 General Plan EIR evaluated whether implementation of the 2040 General Plan EIR would result in a short- or long-term increase in localized carbon monoxide (CO) emissions that exceed VCAPD-recommended thresholds. The analysis in the 2040 General Plan EIR determined that this impact is localized and therefore focuses on operational increases in mobile sources of CO. Ventura County has been in attainment for federal and state CO concentration standards and ambient air monitoring for CO stopped in 2004. The maximum reported CO concentration data from 2003 was 3.5 ppm for the 8-hour average, which is well below the state standard of 20 ppm. Additionally, federal and state vehicle emissions standards are anticipated to decrease CO concentrations going forward. Based on emissions modeling, the 2040 General Plan EIR found that mobile-source CO emissions would not exceed 387 lb/day during operation, which is below the South Coast Air Quality Management District recommended screening threshold of 550/lb per day. This impact was therefore determined to be less-than-significant, and no mitigation was required.

Impact 4.3-5 of the 2040 General Plan EIR evaluated whether implementation of the 2040 General Plan would expose sensitive receptors to substantial increases in toxic air contaminant (TAC) emissions. The analysis in the 2040 General Plan EIR focused on diesel PM, which has the highest potential for adverse health impacts. Future construction that could occur as a result of the 2040 General Plan implementation would generate temporary, intermittent emissions of diesel PM from the exhaust of off-road heavy-duty diesel-powered equipment. Considering the relatively short duration of diesel PM-emitting construction activity at any one location within the Plan area, and the highly dispersive properties of diesel PM, sensitive receptors would not be exposed to substantial concentrations of construction-related TAC emissions. For operational emissions, proximity to highways is the highest risk factor for exposure to diesel PM and growth accommodated by the 2040 General Plan would increase total vehicle miles traveled on County highways.

Additionally, the 2040 General Plan would accommodate future development of stationary sources that could generate new sources of TACs from commercial and industrial land uses. VCAPCD rules would require stationary sources to obtain a permit and install maximum achievable control technology for air toxics, if deemed applicable. General Plan Policies, including HAZ-10.3, HAZ-10.5, HAZ-10.11, HAZ-10.12, LU-17.2, LU-17.4, LU-17.5, and COS-7.2, would also reduce this impact. The 2040 General Plan EIR includes Mitigation Measure AQ-3 to require that new sensitive receptors not be located within 500 feet of any freeway or high-traffic urban or rural roadways unless a site-specific health risk assessment shows that cancer risk would not exceed 10 in 1 million. This impact was determined to be less than significant with implementation of AQ-3.

The Project proposes no changes to any of the General Plan policies cited in the 2040 General Plan EIR as reducing this impact. The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

d) Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact 4.3-6 of the 2040 General Plan EIR evaluated whether implementation of the 2040 General Plan would result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. The analysis in the 2040 General Plan EIR determined that future development and other physical changes associated with the 2040 General Plan could include odor sources, specifically from

agricultural operations, construction activities, and nonresidential land uses. VCAPCD Rule 51 prohibits air contaminants that cause a nuisance and notices of agricultural operations in the County's right-to-farm ordinance and Policy AG-2.1 would reduce potential odor impacts. This impact was therefore determined to be less than significant, and no mitigation is required.

The Project proposes no changes to Policy AG-2.1, the only policy cited in the 2040 General Plan EIR as reducing this impact. The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

e) Cumulative Impacts

The 2040 General Plan EIR found that air quality impacts are assessed at the air basin level and therefore inherently cumulative. With implementation of Mitigation Measure AQ-3, the development of individual discretionary projects would not expose new receptors to a substantial increase in future operational toxic air contaminant emissions. Cumulative development within incorporated cities located adjacent to the Plan area and elsewhere in the air basin could result in increased operational TAC emission sources that would result in a cumulatively significant impact, but the 2040 General Plan includes a policy to protect sensitive receptors from exposure to TAC emissions, which would reduce the Plan's contribution to this cumulatively significant impact to a level that is less than cumulatively considerable.

The County is non-attainment for ozone and PM10. The 2040 General Plan EIR found that construction activities under the Plan could contribute substantially to the County's non-attainment status, which could result in an increase in the potential for adverse health impacts. Cumulative development would also result in increased criteria air pollutant emissions due to construction and operational activities, including increased ozone and PM10 emissions. This was determined to be a cumulatively significant construction and operational impact. Air quality mitigation measures would reduce construction-related air pollutant emissions, but the 2040 General Plan's contribution to this cumulatively significant construction air quality impact would remain cumulatively considerable.

Additionally, reactive organic gases (ROG) and oxides of nitrogen (NOx) emissions could exceed VCAPCD's thresholds within the Ojai Valley. Future development under the Plan would result in long-term operational emissions of ROG, NOx, PM10, and PM2.5. While individual projects may be able to reduce emissions to levels below applicable thresholds, the EIR determined that total operational emissions attributable to forecasted growth accommodated under the Plan would exceed VCAPCD's thresholds and would be a considerable contribution to significant cumulative air pollutant impacts in the region. There is no feasible mitigation for this impact beyond the policies and programs in the Plan. Therefore, the Plan's incremental contribution to this significant cumulative operational air quality impact was found to remain cumulatively considerable.

The 2040 General Plan EIR found a less than significant odor impact. When considered in combination with odors generated by cumulative development, the Plan would not result in a cumulatively significant odor impact affecting substantial numbers of people. Same as the Plan, cumulative development would be subject to VCAPCD rules addressing the generation of odors. The EIR thus determined that the Plan would not have a cumulatively considerable contribution to a cumulatively significant odor impact.

The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe cumulative impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

4.2.2 Energy

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Draft EIR Impact 4.6-1; pages 4.6-18 to 4.6-22. Final EIR, Revisions to Table 2.4, page 3-27. Existing environmental conditions described in the January 2020 Background Report, Chapter 7.	COS-8.1 COS-8.4 COS-8.7 COS-8.8 COS-8.10 COS-M COS-Q COS-U CTM-3.1 CTM-3.3 through CTM-3.5 CTM-3.7 CTM-3.8 CTM-6.5 through CTM-6.9 CTM-C EV-4.4 HAZ-11.7 HAZ-11.10 LU-16.9 PFS-2.3 PFS-2.8 PFS-5.6 PFS-7.6	No	No	No, impact remains less than significant.

Impact Assessment

- a) **Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**
- b) **Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

Impact 4.6-1 of the 2040 General Plan EIR evaluated whether implementation of the 2040 General Plan would result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or impede state or local plans for renewable energy or energy efficiency. The EIR analysis finds that the 2040 General Plan would accommodate relatively higher intensity future development, including potential construction and operation of pipelines as a result of Policies COS-7.7 and COS-7.8. Policy COS-8.7 and Implementation Program COS-U would encourage sustainable building practices, project conditions of approval may require builders to include measures to promote carpooling for construction workers, use of alternative fuels, and use of high-efficiency engines and electric-powered construction equipment, and inherent incentives exist for builders to minimize energy costs. Accordingly, the EIR determined that energy impacts associated with construction are less than significant.

Operationally, future development under the Plan would increase total electricity consumption by 6.8 percent and natural gas consumption by 6.3 percent. Proposed General Plan policies are targeted toward minimizing energy consumption in new construction, increasing use of renewable energy sources, and reducing gas and diesel fuel consumption by reducing vehicle miles traveled and increasing electric vehicle charging infrastructure. While electricity and natural gas use would increase, the electricity consumed would come from utilities producing power from a high proportion of zero carbon electricity sources, energy efficiency measures would be integrated into new construction and existing buildings, the county would substitute natural gas for biomethane, electric vehicle chargers will be installed in public facilities, and vehicle miles traveled programs would be implemented. Accordingly, operational activities associated with future development would not result in wasteful, inefficient, or unnecessary consumption of energy. Additionally, Plan implementation would not conflict with or obstruct state plans for renewable energy or energy efficiency. The policies and programs in the 2040 General Plan would allow the County to not only meet the mandates by 2040 but exceed them by expanding the scope and accelerating the timeframe for all new residential construction. Proposed General Plan policies would promote state plans for energy efficiency and renewable energy. The EIR therefore determined this impact to be less than significant.

The EIR Energy chapter introduction cited Policy COS-7.7 as one of many related to energy consumption and described that Policies COS-7.7 and COS-7.8 might result in construction and operation of new pipelines. In addition, the 2040 General Plan EIR included Mitigation Measures PR-2 and PR-3, which proposed the same revisions to Policies COS-7.7 and COS-7.8 that are proposed by the Project. Thus, no revisions to the 2040 General Plan EIR are necessary to evaluate impacts associated with the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project.

The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already

included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

c) Cumulative Impacts

The 2040 General Plan EIR found that construction that could occur with future development under the Plan would result in a temporary increase in fuel consumption. It was anticipated that fuel would not typically be consumed in a wasteful manner during construction of individual projects under the Plan. Through the policies and programs in the Plan, transportation-related energy would be reduced through improved access to transit alternative and innovative shared transportation models. Under the Plan, the County's energy demand would increase along with population growth; however, state regulations would require a higher proportion of electricity to be generated from zero carbon electricity sources, energy efficiency measures would be integrated into new construction and existing buildings, and General Plan policies would promote enhanced vehicle charging and vehicle miles traveled reductions. Development in surrounding counties will consume energy, but it is likely that the same or similar factors governing development in these areas would result in efficient energy use. Therefore, the 2040 General Plan EIR determined that the potential for cumulative impacts related to energy would not be cumulatively considerable on a regional scale.

The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe cumulative impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

4.2.3 Greenhouse Gas Emissions

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Draft EIR Impact 4.8-1; pages 4.8-37 to 4.8-49. Final EIR, Revisions to Table 2.4, pages 3-28 to 3-34, and Revisions to Greenhouse Gas Emission, pages 3-73 to 3-79. Existing environmental	AG-1.1 AG-3.2 AG-4.3 AG-4.4 AG-B AG-C AG-E AG-G AG-H AG-I AG-J AG-K AG-L COS-8.4 COS-1.13 COS-2.10	No	No	No, impact remains significant and unavoidable.

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
	conditions described in the January 2020 Background Report, Section 12.1.	COS-3.3 COS-5.3 COS-7.4 COS-7.8 COS-8.2 through COS-8.4 COS-8.10 COS-9.1 COS-9.3 COS-C COS-H COS-M through COS-U COS-W CTM-2.5 through CTM-2.9 CTM-2.11 CTM-2.17 CTM-2.22 CTM-2.24 CTM-2.25 CTM-2.27 CTM-6.1 CTM-6.3 through CTM-6.7 CTM-A through CTM-C CTM-I through CTM-O EV-4.4 HAZ-10.1			

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
		HAZ-1.3 HAZ-1.4 HAZ-10.1 HAZ-10-5 through HAZ-10.9 HAZ-Q HAZ-T through HAZ-W LU-11.3 LU-11.14 LU-16.5 LU-16.9 LU-18.5 LU-A PFS-1.10 PFS-2.2 PFS-2.3 PFS-2.6 PFS-5.5 PFS-5.6 PFS-7.2 PFS-7.6 PFS-12.4 PFS-A PFS-E PFS-F PFS-G PFS-J through PFS-L WR-4.4 WR-6.1 through WR-6.3 WR-C			

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
		WR-G WR-H			
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<p>Draft EIR Impact 4.8-2; pages 4.8-49 to 4.8-52.</p> <p>Final EIR, Revisions to Table 2-4, page 3-35 and Revisions to Greenhouse Gas Emission, page 3-79.</p> <p>Existing environmental conditions described in the January 2020 Background Report, Section 12.1.</p>	Same programs and policies cited for Impact 4.8-1, in addition to COS-10.3, COS-Y, COS-Z, COS-AA though COS-DD, and LU-P.	No	No	No, impact remains significant and unavoidable

Impact Assessment

a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact 4.8-1 of the 2040 General Plan EIR evaluated whether implementation of the 2040 General Plan would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The analysis found that development under the 2040 General Plan would accommodate relatively higher intensity uses. The residential, commercial, mixed use, and industrial land use designations would apply to approximately 1.2 percent of land in the unincorporated County. The rural designation would apply to 0.9 percent, agriculture to approximately 9 percent, and open space to approximately 88 percent. Policies COS-7.7 and COS-7.8 could result in the construction of new pipelines for conveyance of oil, gas, or produced water. Such development would result in construction and

operation-related greenhouse gas emissions that contribute to climate change on a cumulative basis. Because greenhouse gas emissions from vehicles are one of the largest sources of emissions in the Plan (36 percent), vehicle miles traveled ("VMT") is an important metric to help measure progress toward reducing greenhouse gas emissions. Under the business-as-usual scenario, adjusted for federal and state climate and energy legislation, greenhouse gas emissions in unincorporated Ventura County were projected to decrease from 1,772,537 MT CO₂e in 2020 to 1,375,898 MT CO₂e in 2040, a decrease of 396,639 MT CO₂e or 22 percent. These reductions are largely due to state and federal implementation of legislation with local benefits. Additionally, emissions related to oil and gas production under the stationary source sector have been declining since 1980 and are expected to continue to decline into the future as oil and gas resources in the area are reduced. While these regulations and resource trends result in meaningful emissions reductions, additional local action may be needed to meet the 2030 reduction target of 41 percent below 2015 levels, as identified in General Plan Policy COS-10.2.

To achieve these additional reductions, the 2040 General Plan identifies 118 policies and 45 implementation programs intended to regulate activities contributing to greenhouse gas emissions in unincorporated Ventura County. The 2040 General Plan EIR found that the actual benefit for many of these policies and implementation programs could not be quantified in advance of adoption because data are not available or the degree to which residences and businesses are likely to participate is unknown. Many of the policies are designed to encourage, promote, or support actions by the public for which the County does not have the regulatory authority to require individuals to comply. The 2040 General Plan EIR quantified those policies and programs for which data on consumption and participation rates are available, finding that the General Plan programs and policies would collectively provide reductions of 168,065 MT CO₂e by 2030, an approximate 11 percent reduction from forecast 2030 levels a 40 percent of the reductions needed to meet a target of 1,138,708 MT CO₂e for consistency with emissions targets identified in Policy COS-10.2. An additional 242,748 MT CO₂e would be needed to close the gap with the 2030 target. Emissions associated with oil and gas exploration and production were not included as quantifiable emissions on Table 4.8-5 of the 2040 General Plan EIR. The 2040 General Plan EIR also described qualitatively on Table 4.8-6 additional reductions anticipated under policies and programs of the 2040 General Plan. Policies COS-7.7 and COS-7.8 are not listed on Table 4.8-6. Table 4.8-7 further described greenhouse gas reducing policies not associated with implementation programs to put the policies into action. Policy COS-7.8 is listed on Table 4.8-7. The 2040 General Plan EIR incorporated Mitigation Measures GHG-1, GHG-2, GHG-3, and GHG-4 to reduce this impact, but determined that even with mitigation, this impact remained significant and unavoidable.

The analysis for this impact cited Policy COS-7.8 as one of 170 greenhouse gas emissions-reducing policies. Policy COS-7.7 was not cited. The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future

applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

b) Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact 4.8-2 of the 2040 General Plan EIR evaluated whether implementation of the 2040 General Plan would conflict with an applicable plan, policy, or regulation for the purpose of reducing the emissions of greenhouse gas emissions. The analysis found that implementation of the 2040 General Plan, in combination with state laws, regulations, and programs, would result in a downward greenhouse gas emissions trajectory for the County that supports the statewide reduction target for 2030 identified in the 2017 Scoping plan and the state's post-2030 reduction goals, including the Executive Order S-3-05 goal of reducing statewide emissions to 80 percent below 1990 levels by 2050. As described in Impact 4.8-1, the 2040 General Plan includes numerous plans and policies expected to reduce greenhouse gas emissions, but the County cannot meaningfully quantify the effect of all its 2040 General Plan policies and programs on future emissions. Therefore, the 2040 General Plan EIR analysis could not conclude that future emissions under the 2040 General Plan would be sufficiently reduced to meet the state's 2030 or post-2030 targets. Further, the General Plan includes the following programs that require the County to monitor and adjust, where necessary, additional measures to further the mix and type of the County's GHG reduction efforts during the 20-year implementation period of the 2040 General Plan: COS Program X: Greenhouse Gas (GHG) Strategy Implementation, COS Program Y: Greenhouse Gas (GHG) Strategy Monitoring, COS Program Z: Public Reporting on Greenhouse Gas (GHG) Strategy Progress, COS Program AA: Greenhouse Gas (GHG) Inventory Updates, COS Program BB: Greenhouse Gas (GHG) Strategy Amendments, and COS Program CC: Climate Emergency Council. The 2040 General Plan EIR incorporates Mitigation Measures GHG-1 through GHG-4 and CTM-1 through CTM-3 but concluded that no additional feasible mitigation measures had been identified and some reductions, particularly in the transportation sector, cannot be assured due to uncertainty in state regulations. Additionally, longer term greenhouse gas emissions reduction goals beyond 2030 would necessitate additional or more stringent policies and programs beyond what is presented in the 2040 General Plan. Due to the County's minimal growth, most of the forecast emissions in 2030 and beyond are caused by energy use in existing buildings, vehicle use, and travel behavior on existing transportation systems, landfilled waste, and agricultural uses where the County has limited authority to regulate. Accordingly, the 2040 General Plan EIR concludes that it could not determine that future emissions would meet state 2030 and post-2030 targets and therefore this impact remained significant and unavoidable.

The analysis references Policy COS-7.8 as one of many greenhouse gas emissions-reducing policies in the 2040 General Plan. The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

c) Cumulative Impacts

The 2040 General Plan EIR found that climate change is inherently a cumulative issue and therefore the impacts evaluated in Section 4.8 of the EIR are also the cumulative effects of implementation of the 2040 General Plan. While policies and programs in the Plan would support greenhouse gas emissions reductions, future reduction effectiveness cannot be reliably quantified and compared to the state's 2030 target and post-2030 reductions. Mitigation Measures are identified to reduce this impact, but not to a less than significant level. As a result, the Plan would result in a significant and unavoidable impact. Thus, the 2040 General Plan EIR determined that the Plan's incremental contribution to cumulatively significant climate change effects would be cumulatively considerable.

The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which

recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe cumulative impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

4.2.4 Mineral Resources

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
a) Result in any land use, project activity, or development, which is on or adjacent to existing mineral resources extraction sites, immediately adjacent to land zoned Mineral Resource Protection (MRP)	Draft EIR Impact 4.12-1; pages 4.12-9 to 4.12-10. Final EIR, Revisions to Table 2-4, page 3-38, and Revisions to Mineral and Petroleum Resources,	COS-6.1 through COS-6.5	No	No	No, impact remains less than significant.

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
overlay zone or land mapped for mineral resources, or adjacent to a principal access road to an existing aggregate extraction or production site, and as a result could hamper or preclude extraction of the resources?	pages 3-82 to 3-83. Existing environmental conditions described in the January 2020 Background Report, Section 8.4.				
b) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	Draft EIR Impact 4.12-2; pages 4.12-10 to 4.12-11. Final EIR, Revisions to Table 2-4, page 3-38. Existing environmental conditions described in the January 2020 Background Report, Section 8.4.	COS-6.1 through COS-6.3 COS-6.5	No	No	No, impact remains less than significant.
c) Result in development on or adjacent to existing petroleum extraction sites	Draft EIR Impact 4.12-3; pages 4.12-11 to 4.12-22.	COS-7.2 COS-7.3	No	No	No, impact remains significant and unavoidable.

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
or areas where petroleum resources are zoned, mapped, or permitted for extraction, which could hamper or preclude access to the resources?	<p>Final EIR, Revisions to Table 2-4, pages 3-39 to 3-40, Revisions to Mineral and Petroleum Resources, pages 3-83 to 3-85.</p> <p>Existing environmental conditions described in the January 2020 Background Report, Section 8.4.</p>				
d) 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?	<p>Draft EIR Impact 4.12-4; pages 4.12-22 to 4.12-32.</p> <p>Final EIR, Revisions to Table 2-4, pages 3-39 to 3-40, Revisions to Mineral and Petroleum Resources, pages 3-85 to 3-87.</p> <p>Existing environmental conditions described in the January</p>	<p>COS-7.7</p> <p>COS-7.8</p>	No	No	Yes, impact is reduced from significant and unavoidable as listed in the CEQA Findings of Fact and Statement of Overriding Considerations to less than significant as described in the 2040 General Plan EIR.

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
	2020 Background Report, Section 8.4. CEQA Findings of Fact and Statement of Overriding Considerations.				

Impact Assessment

- a) **Would the Project result in any land use, project activity, or development, which is on or adjacent to existing mineral resources extraction sites, immediately adjacent to land zoned Mineral Resource Protection (MRP) overlay zone or land mapped for mineral resources, or adjacent to a principal access road to an existing aggregate extraction or production site, and as a result could hamper or preclude extraction of the resources?**

Impact 4.12-1 of the 2040 General Plan EIR evaluated whether implementation of the Plan would result in any land use, project activity, or development, which is on or adjacent to existing mineral resources extraction sites, immediately adjacent to land zoned Mineral Resource Protection (MRP) overlay zone or land mapped for mineral resources, or adjacent to a principal access road to an existing aggregate extraction or production site, and as a result could hamper or preclude extraction of the resources. The analysis in the EIR determined that the potential for this impact would be less than significant with implementation of the proposed 2040 General Plan policies. Policy COS-6.2 would require the County to maintain classification and designation reports and maps of mineral resources deposits recognized as having regional or statewide significance ("MRZ-2"), as identified in the County's Non-Coastal Zoning Ordinance ("NCZO") with an MRP Overlay. The MRP Overlay is intended to safeguard future access to the resources, facilitate the long-term supply of mineral resources in unincorporated Ventura County, and notify landowners and the public of the presence of the resources. (NCZO, § 8104-7.2.) Policies COS-6.1 and COS-6.3 would balance development and conservation of mineral resources with economic, health, safety, and social and environmental protection values (COS-6.1) and promote the local extraction of mineral resources to minimize economic costs and environmental effects associated with importing these resources from outside of the county (COS-6.3). Policy COS-6.4 establishes that future discretionary development would continue to be subject to the provisions of the MRP Overlay, and would be prohibited if the use would substantially hamper or preclude access to, or the extraction of, mineral resources. For discretionary development on or adjacent to mineral extraction sites and adjacent to principal access roads to existing aggregate extraction or production sites, Policy COS-6.5 would require an evaluation of the significance of the mineral resources deposits located in the area to determine whether the use would significantly hamper or preclude access to, or the extraction of, mineral resources. This policy would require discretionary development proposed adjacent to existing mining operations to provide a buffer (based on an evaluation of noise, community character, compatibility, scenic resources, drainage, operating conditions, biological

resources, topography, lighting, traffic, operating hours, and air quality) between the development and mining operations to minimize land use incompatibility and avoid nuisance complaints. The 2040 General Plan EIR therefore determined this impact to be less than significant, and no mitigation was required.

The Project proposes no changes to Policies COS-6.1, COS-6.2, COS-6.3, COS-6.4, or COS-6.5, the only policies cited in the 2040 General Plan EIR as reducing this impact. The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

The addition of the mitigation measures to Policies COS-7.7 and COS-7.8 does not implicate mineral resources in general, and does not affect the analysis of this impact.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

b) Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

Impact 4.12-2 of the 2040 General Plan EIR evaluated whether implementation of the Plan would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. The analysis in the EIR determined that future development associated with Plan implementation would not be anticipated to result in such loss. Policies COS-6.1 and COS-6.3 would balance the development and conservation of mineral resources with economic, health, safety, and social and environmental protection values (COS-6.1) and promote the extraction of local mineral resources to minimize economic costs and environmental effects associated with importing these resources from outside Ventura County (COS-6.3). Policy COS-6.2 would require the County to maintain classification and designation reports and maps of mineral resources deposits recognized as having regional or statewide significance. Policy COS-6.5 would require future discretionary development to evaluate the significance of the mineral resource deposits located in the area of a proposed development based on the most current mineral resource zone ("MRZ") maps available at the time development is proposed, as updated pursuant to Policy COS-6.2. This impact was therefore determined to be less than significant, and no mitigation is required.

The Project proposes no changes to Policies COS-6.1, COS-6.2, COS-6.3, or COS-6.5, the only policies cited in the 2040 General Plan EIR as reducing this impact. The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible

to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

The addition of the mitigation measures to Policies COS-7.7 and COS-7.8 does not implicate mineral resources in general, and does not affect the analysis of this impact.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

c) Would the Project result in development on or adjacent to existing petroleum extraction sites or areas where petroleum resources are zoned, mapped, or permitted for extraction, which could hamper or preclude access to the resources?

Impact 4.12-3 of the 2040 General Plan EIR evaluated whether implementation of the Plan would result in development on or adjacent to existing petroleum extraction sites or areas where petroleum resources are zoned, mapped, or permitted for extraction, which could hamper or preclude access to the resources. The analysis in the EIR determined that with implementation of Policies COS-7.2 and COS-7.3, future residential development or new schools could preclude expansion of existing oil and gas operations, as well as drilling of new discretionary wells, thereby hampering or precluding access to the petroleum resources. Policy COS-7.2 would increase the setback requirements for new discretionary oil wells to a minimum of 1,500 feet from residential dwellings and 2,500 feet from any school, compared to the minimum requirements under the County's existing zoning ordinances of 800 feet from sensitive uses and 500 feet from dwelling units unless waived by occupants of the sensitive uses. Policy COS-7.3 would require that new or modified discretionary use permits for oil and gas exploration, production, drilling, and related operations be subject to current State and County policies, standards, and conditions. Policies COS-7.2 and COS-7.3 are intended to limit effects on human health that can be associated with sudden events, such as accidental explosions, as well as prolonged exposure to air contaminants, odor, and noise from oil and gas extraction sites. The EIR noted that the 2040 General Plan Land Use Diagram identifies residential land use designations in existing oil fields and near existing wells and there is potential that future development of dwelling units and schools could occur within 1,500 feet and 2,500 feet, respectively, of petroleum reserves where new discretionary oil and gas extraction may be proposed during the planning horizon of the Plan. Thus, the EIR determined that, depending on the size of parcels, size of the proposed structures, and configuration of existing land uses, future development of residential dwellings or schools could preclude access to petroleum resources that are mapped and zoned for extraction, and this impact would be potentially significant.

Accordingly, the EIR recommended Mitigation Measure PR-1 to revise Policy COS-7.2 to expand the types of sensitive uses that would be required to have minimum setback distances from new discretionary oil and gas wells while reducing the setback required for schools from 2,500 feet to 1,500 feet. Even with the proposed mitigation, the EIR concluded that no actions or policies that the County could feasibly mandate exist to fully reduce the impact that Policy COS 7.2 would have on hampering or precluding access to petroleum resources and that this impact would remain significant and unavoidable.

The Project proposes no changes to Policies COS-7.2 or COS-7.3 as adopted. The setback policy will be retained.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

d) Would the Project 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?

Impact 4.12-4 of the 2040 General Plan EIR evaluated whether implementation of the Plan would 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. Policy COS-7.7 would require that new discretionary oil wells use pipelines to convey oil and produced water off-site (rather than trucking). Policy COS-7.8 would require gases emitted from all new discretionary oil and gas wells to be collected and used or removed for sale or proper disposal (rather than flaring), except for cases of emergency or for testing purposes. The analysis in the EIR determined that adoption of Policies COS-7.7 and COS-7.8 could result in the loss of a known petroleum resource of value to the region and the State because the policies would mandate infrastructure that may be technologically or economically infeasible to install.

With respect to Policy COS-7.7, the EIR noted that the County's existing zoning ordinances already require use of pipelines to convey crude oil and gas, where feasible. (NCZO, § 8107-5.5.5, subd. (a); Coastal Zoning Ordinance ("CZO"), § 8175-5.7.7, subd. (e).) The EIR determined that oil operations within a two-mile radius of a major oil transmission pipeline may be effectively prohibited by Policy COS-7.7 due to the technological or economic infeasibility of connecting to existing smaller gathering or minor pipelines or of installing additional on-site production facilities as required to process crude oil in accordance with API gravity thresholds and standards for conveyance of oil through a major oil transmission pipeline. Further, the EIR assumed that for oil facilities beyond the two-mile radius, it would be technologically and economically infeasible to install the new Class II injection wells required to inject produced water underground or convey produced water to a major transmission pipeline.

With respect to Policy COS-7.8, the EIR noted that the County's existing zoning ordinances already require gas to be piped off-site rather than flared, unless the permit applicant can demonstrate that doing so would not be feasible or practicable. (NCZO, § 8107-5.5.7; CZO, § 8175-5.7.7, subd. (g).) Additionally, VCAPCD Rule 71.1 prohibits venting of organic gases to the atmosphere; thus, storage tanks must include vapor recovery systems and produced gas must be directed to an on-site fuel system, a sales gas system, or a flare that combusts reactive organic gases, or a device with a reactive organic compound destruction or removal efficiency of at least 90 percent by weight. The EIR assumed that oil operators located beyond the two-mile radius of a major gas transmission would not be able to comply with the pipeline requirements of Policy COS-7.8 due to the technical or economic infeasibility of either using the gas on-site, installing gas injection wells, or installing new pipelines to connect to a major gas transmission line. Further, oil operators within the two-mile radius which rely upon flaring to dispose of produced gas may be effectively prohibited by Policy COS-7.8 due to the technological or economic infeasibility of connecting to existing smaller gathering or minor pipelines for future discretionary oil and gas wells. Further, if gas collected from oil wells

and storage tanks cannot be used or removed for sale or proper disposal or flared pursuant to COS-7.8, the entire facility must be shut down.

Therefore, the EIR determined that, although the impact would likely be at a smaller scale and concentrated on oil operators located outside of the two-mile radius of a major oil or gas transmission pipeline, Policies COS-7.7 and COS-7.8 would render a substantial quantity of petroleum resources inaccessible and this impact would be potentially significant.

Accordingly, the EIR recommended Mitigation Measures PR-2 and PR-3 to revise Policies COS-7.7 and COS-7.8 to include some flexibility consistent with the County's existing zoning ordinances. The proposed mitigation would allow the County to approve new discretionary oil and gas wells where operators can establish the infeasibility of conducting the proposed exploration and production operations without trucking and/or flaring or venting and would allow trucking during emergencies and for testing purposes. The EIR concluded that Mitigation Measures PR-2 and PR-3 would reduce the potential impact regarding a loss of availability of a known petroleum resource that would be of value to the region and the residents of the State to less than significant. Because the recommended mitigation measures were not incorporated into the 2040 General Plan, the CEQA Findings of Fact and Statement of Overriding Considerations adopted by the Board found impacts to loss of availability of a known petroleum resource that would be of value to the region and the residents of the state to be significant and unavoidable.

The Project will incorporate the same proposed mitigation measures for Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. Accordingly, no revisions to the 2040 General Plan EIR are therefore necessary to evaluate Project impacts because the impacts were already evaluated in the EIR. Further, as stated in the 2040 General Plan EIR, incorporating these mitigation measures into the policies will reduce this impact to a less than significant level.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR. By adopting Mitigation Measures PR-2 and PR-3 as recommended in the 2040 General Plan EIR, the General Plan Amendments would eliminate the significant and unavoidable impact to loss of availability of a known petroleum resource that would be of value to the region and the residents of the state, which was listed previously in the CEQA Findings of Fact and Statement of Overriding Considerations. This impact would now be less than significant as described in the 2040 General Plan EIR. Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR.

e) Cumulative Impacts

The 2040 General Plan EIR found that the Plan includes residential and industrial land use designations in areas of mapped mineral resources. With implementation of the Plan, future discretionary development would continue to be subject to the MRP Overlay Zone, and the County would ensure that discretionary development in areas that may contain mineral resources is compatible with mineral resources extraction and processing activities. Because of existing laws and regulations in adjacent cities and counties protecting lands underlain by mineral resources of value to the state, the incremental impacts of the Plan would not combine with the effects of cumulative development to result in a cumulatively significant impact on mineral resources. Thus, because the Plan would not adversely affect access to mineral resources, the 2040 General Plan EIR determined that implementation of the Plan would not have a considerable contribution such that a new cumulatively significant mineral resources impact would occur.

The 2040 General Plan EIR found that future development of residential dwellings and schools could occur in vicinity of oil fields and near wells, and that such development could preclude access to petroleum resources as a result of Policy COS-7.2, which increases setbacks between new discretionary oil wells and homes and schools. The EIR found that this project-level impact to petroleum resources access would be significant and unavoidable. It further found that the Plan's incremental effects would combine with the effects of cumulative development, which due to increased urbanization to accommodate population and job growth in proximity to oil and gas deposits, and State and local regulations addressing the location and methods of oil and gas extraction, would also hamper or preclude access to petroleum resources. Because the Plan's impacts on hampering or precluding access to petroleum resources – primarily due to incompatible development in the vicinity of petroleum access sites – would remain significant and unavoidable with mitigation measures, the 2040 General Plan EIR determined that the Plan's impacts related to hampering or precluding access to petroleum resources would be cumulatively considerable. This impact would remain unchanged.

The 2040 General Plan EIR found that Policies COS-7.7 and COS-7.8 could result in the loss of a known petroleum resource of value to the region and the state because these policies would render a substantial quantify of petroleum resources inaccessible and result in the loss of availability in some parts of the Plan area. The EIR also found that the impact would be reduced to less than significant with adoption of Mitigation Measures PR-2 and PR-3 that were included in the EIR. The Project will revise Policies COS-7.7 and COS-7.8 to incorporate Mitigation Measures PR-2 and PR-3 as recommended by the 2040 General Plan EIR. With these revisions, the Project will continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project will, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR found that Policies COS-7.7 and COS-7.8, even as mitigated by Mitigation Measures PR-2 and PR-3, would incrementally combine with the effects of cumulative development and contribute to the cumulatively considerable impact related to hampering or precluding access to petroleum resources as described in the above-stated paragraph. This impact would remain unchanged.

The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new

discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe cumulative impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

4.2.5 Transportation

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Draft EIR Impact 4.16-4, pages 4.16-34 to 4.16-35. Final EIR Revision to Table 2-4, page 3-50. Existing environmental conditions described in the January 2020 Background Report, Chapter 6.	CTM-2.1 CTM-2.12 CTM-2.14 through CTM-2.16 CTM-2.18 CTM-2.20 through CTM-2.23 CTM-2.25 CTM-3.1 through CTM-3.9	No	No	No, impact remains less than significant.

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<p>Draft EIR Impact 4.16-1, pages 4.16-23 to 4.16-28.</p> <p>Final EIR Revisions to Table 2-4, page 3-46 to 3-49, and Revisions to Transportation and Traffic, pages 3.90 to 3.92.</p> <p>Existing environmental conditions described in the January 2020 Background Report, Chapter 6.</p>	<p>COS-7.7 COS-7.8 CTM-1.2 CTM-2.1 through CTM-2.13 CTM-2.17 CTM-2.23 CTM-2.25 through CTM-2.27 CTM-3.1 through CTM-3.5 CTM-4.1 through CTM-4.4 CTM-6.1 CTM-6.8 CTM-B CTM-C CTM-K CTM-L CTM-P HAZ-10.6 HAZ-10.8 LU-16.5 PFS-2.6 PFS-F</p>	No	No	No, impact remains significant and unavoidable.
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or	<p>Draft EIR Impact 4.16-2, pages 4.16-28 to 4.16-33.</p> <p>Final EIR Revisions to</p>	<p>CTM-2.1 CTM-2.3 CTM-2.14 through CTM-2.16 CTM-2.19 through</p>	No	No	No, impact remains significant and unavoidable.

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
incompatible uses (e.g., farm equipment)?	Table 2-4, page 3-49. Existing environmental conditions described in the January 2020 Background Report, Chapter 6.	CTM-2.21 CTM-H CTM-Q LU-16.5			
d) Result in inadequate emergency access?	Draft EIR Impact 4.16-3, pages 4.16-33 to 4.16-34. Final EIR Revisions to Table 2-4, page 4-49. Existing environmental conditions described in the January 2020 Background Report, Chapter 6.	CTM-1.13 CTM-1.15 CTM-2.5 CTM-2.28 CTM-G CTM-R <u>Area Plan Policies</u> LS-16.4 LS-31.1 LS-31.3 LS-31.5 LS-47.11 OP-40.1 OJ-34.1 P-DD	No	No	No, impact remains significant and unavoidable.
e) Substantially Interfere with Railroad Facility Integrity and/or Operations	Draft EIR Impact 4.16-5, page 4.16-35. Final EIR Revisions to Table 2-4, page 3-50. Existing environmental	CTM-1.15 CTM-2.23 CTM-1.13 CTM-2.29	No	No	No, impact remains less than significant.

Would the Project:	Impact Addressed in 2040 General Plan EIR	Relevant Policies Identified in the Previous Analysis	New or More Significant Impact?	New Information Requiring Additional Analysis?	Any Change to Prior Impact Conclusion?
	conditions described in the January 2020 Background Report, Chapter 6.				
f) Substantially Interfere with or Compromise the Operations or Integrity of an Existing Pipeline	<p>Draft EIR Impact 4.16-6, pages 4.16-35 to 4.16-36.</p> <p>Final EIR Revision to Table 2-4, page 3-50.</p> <p>Existing environmental conditions described in the January 2020 Background Report, Chapter 6.</p>	None	No	No	No, impact remains less than significant.

Impact Assessment

a) Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Impact 4.16-4 of the 2040 General Plan EIR evaluated whether implementation of the 2040 General Plan would conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such features. The analysis finds that implementation of the Plan would improve existing bicycle, pedestrian, and multi-modal circulation and would result in population increases that would increase pedestrian and bicycle travel. Policies that improve performance of these facilities promote and do not conflict with existing policies, plans, or programs. New trips and VMT (vehicle miles traveled) may result in an interference with operations of existing transit services and/or routes, but several General Plan policies address those impacts by encouraging coordination, expansion, and access improvements of public transportation facilities needed to mitigate those impacts. Accordingly, the 2040 General Plan EIR determined that this impact is less than significant.

The Project proposes no changes to any of the General Plan policies cited in the 2040 General Plan EIR as reducing this impact. The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

b) Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact 4.16-1 of the 2040 General Plan EIR evaluated whether implementation of the 2040 General Plan would exceed VMT thresholds. The analysis found that development under the 2040 General Plan would accommodate relatively higher intensity uses. The residential, commercial, mixed use, and industrial land use designations would apply to approximately 1.2 percent of land in the unincorporated County. The rural designation would apply to 0.9 percent, agriculture to approximately 9 percent, and open space to approximately 88 percent. Policies COS-7.7 and COS-7.8 could result in the construction of new pipelines for conveyance of oil, gas, or produced water and Policy COS-7.7 would result in a potential reduction of VMT in the unincorporated county. Table 4.16-5 of the 2040 General Plan EIR displays the increment of VMT change associated with the growth identified in the 2040 General Plan for each land use type. For industrial land uses, the target metric is VMT/employee, the target is 15 percent reduction of the regional average, and the 2040 General Plan exceeded the threshold of 11.49 with a result of 14.51.

The 2040 General Plan includes policies and programs to reduce VMT, either directly or through multimodal transportation improvements. Other policies support the goal of VMT reduction through a variety of means,

including encouraging access, connectivity, and safety of vehicle-alternatives modes, efficient land use patterns that shorten travel distances, and travel demand and mobility programs that reduce single-occupancy vehicle use. The County Non-Coastal Zoning Ordinance also includes requirements designed to reduce VMT, including applicant-funded Transportation Demand Management Plans and trip reduction measures. The 2040 General Plan includes Mitigation Measures CTM-1, CTM-2, and CTM-3, which require evaluation of VMT for individual projects development of a VMT reduction program. Such mitigation would reduce the rate of VMT associated with existing and future development in the County, but the impact would not be reduced to less than significant due to the increased development, new roadways, and increased number of users of the County's transportation system. Accordingly, the 2040 General Plan EIR determined that this impact is significant and unavoidable.

The Project proposes no changes to any of the General Plan policies cited in the 2040 General Plan EIR as reducing this impact. The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

c) Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact 4.16-2 of the 2040 General Plan EIR analyzed whether transportation infrastructure needed to accommodate growth under the 2040 General Plan would result in adverse effects related to County road standards and safety. The analysis determined that growth under the Plan would cause new trips along

existing roadways, including substandard roadway facilities that do not meet current standards and potentially roadways with a high collision incidence. A net increase in daily traffic volumes on Box Canyon Road and portions of Katherine Road, Lynn Road, Ventu Park Road, and Haigh Road would result in a safety impact. Traffic generated by buildout under the 2040 General Plan would not substantially increase existing traffic volumes, but such traffic would result in a net increase in traffic volumes within three of the County-designated substandard roadway impact areas related to safety impacts. New and upgraded roadways needed to accommodate new development would be designed to modern standards and to comply with policies and programs proposed in the 2040 General Plan to minimize roadway design hazards and improve safety for all road users. The 2040 General Plan EIR included Mitigation Measure CTM-4, which requires an updated traffic impact fee mitigation program, but no other feasible mitigation is available to eliminate safety concerns with identified substandard roadways. The 2040 General Plan EIR therefore determined that this impact is significant and unavoidable.

The Project proposes no changes to any of the General Plan policies cited in the 2040 General Plan EIR as reducing this impact. The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

d) Would the Project result in inadequate emergency access?

Impact 4.16-3 of the 2040 General Plan EIR evaluated whether implementation of the 2040 General Plan would result in inadequate emergency access. The analysis found that Plan implementation would allow

for increased development to accommodate projected population and job increases. New trips may affect adequate emergency access and emergency response times by increasing the number of vehicles and demand on the County's existing transportation system. The need for emergency services would also increase with increases in development and road users. General Plan policies and programs would require the County to develop and maintain emergency service operation and service level that results in adequate emergency access. Further, the 2040 General Plan EIR included Mitigation Measure CTM-5 and CTM-6, which require the County to conduct project-level analysis and mitigation to guarantee continued emergency access and to plan capital improvement plans to maintain and upgrade emergency access. While the County is working on the upgrade and enhancement of roadways with access issues, the county would not be able to rectify all outstanding issues within the timeframe of the 2040 General Plan. The 2040 General Plan EIR therefore determined that this impact is significant and unavoidable.

The Project proposes no changes to any of the General Plan policies cited in the 2040 General Plan EIR as reducing this impact. The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.²

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

² The Project also does not change the provisions of the zoning ordinance requiring use of pipelines for the conveyance of crude oil and gas that effectively limits the use of trucks. (County Non-Coastal Zoning Ordinance § 8107-5.5.5(a) and Coastal Zoning Ordinance § 8175-5.7.7(e).)

e) Would the Project substantially interfere with railroad facility integrity and/or operations?

Impact 4.16-5 of the 2040 General Plan EIR evaluated whether implementation of the 2040 General Plan would substantially interfere with railroad facility integrity and/or operations. The analysis found that implementation of the 2040 General Plan would be unlikely to allow for development that would significantly interfere with existing railroad facility integrity or operations. Future development under the Plan could, due to project-specific details such as design features, location, construction activities, or other circumstances, potentially interfere with existing rail facilities or operations. It was not anticipated that trips generated by future development allowed under the Plan would interfere with existing rail facilities or operations. The 2040 General Plan includes policies that encourage facility and service improvements to railroads, passenger rail, and railroad/yards as it relates to goods movement. The 2040 General Plan EIR required Mitigation Measure CTM-7, which requires all new discretionary development to be evaluated and mitigation imposed for potential impacts to existing railroad facilities and operations. With implementation of Mitigation Measure CTM-7, the 2040 General Plan EIR determined this impact to be less than significant.

The Project proposes no changes to any of the General Plan policies cited in the 2040 General Plan EIR as reducing this impact. The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, to the extent that the trucking and flaring policies may generate traffic that implicates rail safety, there is no new significant impact from adding the mitigation measures to the policies. Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

f) Would the Project substantially interfere with or compromise the operations or integrity of an existing pipeline?

Impact 4.16-6 of the 2040 General Plan EIR evaluated whether implementation of the 2040 General Plan would substantially interfere with or compromise the operations or integrity of an existing pipeline. The analysis determined that investigation of the type, location, and operations of existing or future pipelines for transportation of petroleum, petroleum products, natural gas, and similar pipelines would be evaluated as part of a standard review process as projects are submitted for review by the County. Where existing pipelines are identified, the County and applicants would work with utility owners to relocate, abandon, or protect the utilities in place. Unknown utility facilities could also be encountered, in which case Government Code Section 4216 would require contractors to contact DigAlert to notify utility companies of proposed excavation sites. Utility companies are required to mark where underground pipelines and transmission lines are located. Because of the procedures in place to avoid such impacts, the 2040 General Plan EIR determined that this impact would be less than significant.

The Project proposes no changes to any of the factors cited in the 2040 General Plan EIR as the basis for the conclusion that this impact would be less than significant. Policies COS-7.7 and COS-7.8 were not part of the basis for this significance conclusion, and adding the EIR mitigation measures to those policies does not change or affect this conclusion in the General Plan EIR. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, to the extent there could be any argument that the Project may have some new adverse impact relating to pipeline safety, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allows either flaring or trucking. Any impact associated with the approval of a new discretionary oil well under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application would require evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

g) Cumulative Impacts

The 2040 General Plan EIR found that the travel demand model used to analyze the Plan reflects the changes to future growth patterns assumed as part of the Plan. The VMT impact analysis relies on existing and future growth accommodated through the plan and accounts for the projected growth of the surrounding cities and counties. Therefore, the transportation and traffic impacts identified in Section 4.16 of the EIR

are inherently cumulative. The VMT and County road standards and safety impacts would remain significant and unavoidable even with mitigation measures. The 2040 General Plan EIR determined that potential for cumulative impacts related to transportation and traffic would be cumulatively significant, and the Plan would have a considerable contribution.

The 2040 General Plan includes policies that would require adequate emergency access provisions are made to accommodate increased population and growth. Additionally, several of the Area Plans included policies and programs that commit to the continued review of all discretionary development to ensure adequate emergency access. New trips and increased VMT may result in an interference with the operations of existing transit services and/or routes. The Plan policies address these impacts by encouraging the coordination, expansion, and access improvements of public transportation facilities.

The 2040 General Plan EIR determined that implementation of the Plan would not result in significant impacts to the operation of existing rail facilities and pipelines. Impacts to railroad facilities and pipelines are generally temporary during construction and site-specific and do not combine with distant projects to create greater cumulative effects. This cumulative impact was found to be less than significant, and the Plan would not have a cumulatively considerable contribution to a significant cumulative impact.

The Project will incorporate revisions to Policies COS-7.7 and COS-7.8 that were recommended by the 2040 General Plan EIR. The Project would continue to prohibit generally trucking of oil and produced water and flaring of gas for new wells requiring discretionary approval by the County. The Project would, however, provide the County with the flexibility to approve new discretionary wells that require trucking or flaring if it is demonstrated that it would be infeasible to drill the new well without flaring or trucking. The 2040 General Plan EIR did not find any significant impacts associated with Mitigation Measures PR-2 and PR-3 (which recommended the policy revisions proposed by the Project) that were distinct from the significant impacts of the Plan. Because the revisions to Policies COS-7.7 and COS-7.8 proposed by the Project were already included as mitigation measures in the EIR, the Project proposes no changes to the 2040 General Plan EIR.

In addition, Policies COS-7.7 and COS-7.8 apply only to new discretionary oil wells. New discretionary oil wells are a small subset of oil development within unincorporated Ventura County. A total of 56 new discretionary oil wells were approved by the County between 2008 and 2015, and none have been approved since 2015. As described in Section 3.2 of this Addendum, it is unknown how many, if any, future applications will be submitted and approved for new discretionary oil wells, and Planning Staff are not currently in receipt of any applications for new discretionary oil wells or aware of any plans for such applications. It is also unknown how many, if any, of those applications would be able to demonstrate to the satisfaction of the County that the well could not feasibly be drilled without flaring or trucking under the revised policies. It is therefore not possible to predict or evaluate the impact that may result from potential future approvals of new discretionary oil wells that allow either flaring or trucking. Any impact associated with the approval of new discretionary oil wells under the revised policies would be speculative. Further, because the revised policies apply only to new discretionary oil wells, any such application triggering the revised policies would be a discretionary action that would require some level of evaluation of environmental impacts of the specific development proposal under CEQA.

There is no new information of substantial importance that would result in a new or substantially more severe impact than shown in the 2040 General Plan EIR.

Based on the foregoing, no new significant impacts or substantially more severe cumulative impacts would occur compared to those identified in the 2040 General Plan EIR and the conclusions and findings of the 2040 General Plan EIR remain valid.

CHAPTER 5 PRIMARY DOCUMENTS REVIEWED AND REFERENCES

Ventura County 2040 General Plan

Ventura County Draft Environmental Impact Report, Ventura County 2040 General Plan, including Appendices (January 2020)

Ventura County Final Environmental Impact Report, Ventura County 2040 General Plan, including Attachments (September 2020)

Ventura County CEQA Findings of Fact and Statement of Overriding Considerations for the Ventura County General Plan

Ventura County Coastal and Non-Coastal Zoning Ordinances

Ventura County Air Quality Pollution Control District, Air Quality Management Plan (2022), available at: <http://www.vcapcd.org/AQMP-2022.htm>.

California Department of Conservation, Geologic Energy Management Division, Oil and Gas Supervisor Annual Report 2020, available at:

<https://www.conservation.ca.gov/calgem/Documents/Final%20CalGEM%20Supervisor%20Annual%20Report%202020%20-%202023.05.30.pdf>