

County of Ventura
Board of Supervisors Hearing
September 15, 2020
Case No. PL17-0141

Exhibit 19.a

Draft EIR, Chapters 1 - 9



DRAFT ENVIRONMENTAL IMPACT REPORT

Ventura County 2040 General Plan



STATE CLEARINGHOUSE No: 2019011026

Prepared for



County of Ventura
County Government Center Hall of Administration

January 2020



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Prepared for:



County of Ventura
County Government Center Hall of Administration
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LIST OF ABBREVIATIONS

°C	degrees Celsius
AADT	annual average daily traffic volume
AASHTO	American Association of State Highway and Transportation Officials
AB	Assembly Bill
ACLUP	Airport Comprehensive Land Use Plan
ADU	accessory dwelling units
AGP	Agricultural Preserves
AICUZ	Air Installations Compatible Use Zone
APCD	Air Pollution Control District
AQMP	Air Quality Management Plan
AWMP	Agricultural Water Management Plan
BACT	Best Available Control Technology
BMP	best management practices
CAAQS	California ambient air quality standards
CAC	County Agricultural Commissioner
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CAMUTCD	California Manual on Uniform Traffic Control Devices
CAP	Climate Action Plan
CARB	California Air Resources Board
CASGEM	California Statewide Groundwater Elevation Monitoring Program
CAUSE	Coast Alliance United for a Sustainable Economy
CBC	California Building Code
CCA	Community Choice Aggregation
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CDFW	California Department of Fish and Wildlife
CFC	California Fire Code
CGS	California Geological Survey
CMP	Congestion Management Program
CMWD	Casitas Municipal Water District
CNDDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent

CPA	Clean Power Alliance
CPUC	California Public Utilities Commission
CURB	City Urban Restriction Boundaries
CWPA	Critical Wildlife Passage Areas
dB	decibel
dBA	A-weighted decibel
DFIRM	Digital Flood Insurance Rate Maps
DOGGR	Division of Oil, Gas, and Geothermal Resources
du/ac	dwelling units per acre
DWR	California Department of Water Resources
EIR	environmental impact report
EMFAC	Emission Factor
EO	Executive Order
EOP	Emergency Operations Plan
EPA	U.S. Environmental Protection Agency
ESA	federal Endangered Species Act
ESHA	environmentally sensitive habitat areas
EV	electric vehicle
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FHSV	fire hazard severity zone
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	greenhouse gas
GIS	geographic information system
GPU	General Plan Update
GSA	groundwater sustainability agency
GSP	groundwater sustainability plans
GWP	global warming potential
HCD	Housing and Community Development
HCWC	Habitat Connectivity and Wildlife Corridor
HFA	Hazardous Fire Areas
HRA	health risk assessment
ICLEI	International Council for Local Environmental Initiatives
IEPR	Integrated Energy Policy Report
IFC	International Fire Code
IOU	Investor Owned Utility
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resource Management Plan
ISAG	Initial Study Assessment Guidelines

LAFCo	Local Agency Formation Commission
lbs	pounds
LCA	Land Conservation Act
L _{eq}	equivalent noise level
L _{max}	maximum instantaneous noise level
LOS	level of service
LRA	Local Responsibility Area
LUST	leaking underground storage tank
MACT	maximum achievable control technology
MBTA	Migratory Bird Treaty Act
MEI	Maximum Exposed Individual
MHMP	<i>Multi-Hazard Mitigation Plan</i>
MICOP	Mixteco Indigena Community Organizing Project
MMPA	Marine Mammal Protection Act
MS4	Municipal Separate Storm Sewer System
NAAQS	national ambient air quality standards
NBVC	Navy Base Ventura County
NCZO	Non-Coastal Zoning Ordinance
NEHRP	National Earthquake Hazards Reduction Program
NHTSA	National Highway Traffic Safety Administration
NIMS	National Incident Management System
NOC	notice of completion
NOP	notice of preparation
NPDES	National Pollutant Discharge Elimination System
OES	Office of Emergency Services
OPR	Governor's Office of Planning and Research
OWTS	Onsite Wastewater Treatment Systems
PM ₁₀	respirable particulate matter with aerodynamic diameter of 10 micrometers or less
PM _{2.5}	fine particulate matter with aerodynamic diameter of 2.5 micrometers or less
ppm	parts per million
PUE	Pesticide Use Enforcement
PV	photovoltaic
RHNA	Regional Housing Needs Assessment
RPS	Renewable Portfolio Standard
RRN	Regional Road Network
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SAFE Rule	Safer Affordable Fuel-Efficient Vehicles Rule
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast AQMD

SCCAB	South Central Coast Air Basin
SCE	Southern California Edison
SEMS	Standardized Emergency Management System
Sewer Policy	Ventura County Sewer Policy
SGMA	Sustainable Groundwater Management Act
SOAR	Save Open Space & Agricultural Resource
SoCalGas	Southern California Gas Company
SOI	sphere of influence
SOP	Standard Operating Procedure
SOV	single-occupancy vehicle
SQMP	Stormwater Quality Management Program
SR	State Route
SRA	State Responsibility Area
STAA	Surface Transportation Assistance Act
SWP	State Water Project
SWRCB	State Water Resource Control Board
TAC	toxic air contaminant
TCE	trichloroethylene
TCM	Transportation Control Measure
TERPS	Terminal Instrument Procedure
TP	Timberland Preserve
TPZ	Timberland Production Zone
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey,
UWMP	Urban Water Management Plans
VCAPCD	Ventura County Air Pollution Control District
VC-CAPS	Ventura County Coalition Advocating for Pesticide Safety
VCFD	Ventura County Fire Department
VCREA	Ventura County Regional Energy Alliance
VCTC	Ventura County Transportation Commission
VMT	vehicle miles travelled
WDR	Waste Discharge Requirement
WPD	Watershed Protection District
WUI	wildland urban interface
ZNE	zero net energy

1 INTRODUCTION

The County of Ventura, Resource Management Agency, Planning Division (County) is currently developing the Ventura County 2040 General Plan Update (hereinafter referred to as the “2040 General Plan”). The 2040 General Plan includes goals, policies, and implementation programs that will guide the development of Ventura County through the year 2040.

This draft environmental impact report (EIR) was prepared to evaluate the potential environmental impacts associated with the implementation of the 2040 General Plan (State Clearinghouse Number 2019011026). This document is prepared in conformance with the California Environmental Quality Act (CEQA; California Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.).

1.1 OVERVIEW OF THE GENERAL PLAN

The 2040 General Plan is a comprehensive effort to update the existing General Plan and respond to current local and regional conditions, as well as changes in state law that may not have been in place when the general plan was last updated in 2005. It clarifies and articulates the County’s intentions with respect to the rights and expectations of the various communities, including residents, property owners, and businesses. Through the 2040 General Plan, the County informs these groups of its goals, policies, and standards, thereby communicating expectations of the public and private sectors for meeting community objectives. In addition, the general plan includes Area Plans that specifically address growth and resource concerns within nine of the county’s identified communities.

Because the general plan and Area Plans are the basis for all future development in a local jurisdiction, any decision by a county affecting land use and development must be consistent with the respective plan. This includes any development projects proposed in the future. An action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and will not inhibit or obstruct their attainment (OPR 2017:255).

The 2040 General Plan is organized to satisfy the state’s required general plan elements (or chapters). It addresses the state’s mandatory elements (i.e., land use, circulation, housing, conservation, open space, noise, and safety), plus the new requirements for air quality and environmental justice, and three new optional elements: water, agriculture, and economic development. Each of the general plan elements and Area Plans contain goals, policies, and implementation programs, which constitute the County of Ventura’s policies for land use, development and environmental quality. These terms are defined as follows:

- ▶ **Goal**— A statement that describes in general terms a desired future condition or end state. Goals describe ideal future conditions for a topic and tend to be very general and broad.
- ▶ **Policy**— A clear and unambiguous statement that guides a specific course of action for decision-makers to achieve a desired goal.

- Implementation Program—An action, procedure, program, or technique that carries out general plan policy.

1.2 OVERVIEW OF THE CEQA PROCESS

1.2.1 Type and Use of This EIR

This EIR fulfills the requirements for a program EIR. Although the legally required contents of a program EIR are the same as those of a project EIR, program EIRs typically cover broad programs or large projects, such as a general plan, and contain a more general discussion of impacts, alternatives, and mitigation measures than a project EIR. Agencies generally prepare program EIRs for programs or a series of related actions that are linked geographically, are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program, or are individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways. By its nature, a program EIR considers the overall effects associated with implementing a program (such as a general plan) and does not, and is not intended to, examine individual projects that may be implemented pursuant to the general plan.

Once a program EIR has been prepared, subsequent activities within the program must be evaluated to determine if additional CEQA documentation is required to address the significant impacts of such activities. Subsequent activities could be found to be within the program EIR scope and additional environmental documents may not be required (State CEQA Guidelines Section 15168[c]). When a program EIR is relied on for a subsequent activity, the lead agency must incorporate feasible mitigation measures and alternatives developed in the program EIR into the subsequent activities (State CEQA Guidelines Section 15168[c][3]). If a subsequent activity could result in effects not within the scope of the program EIR, including new or more severe significant impacts than identified in the program EIR, the lead agency must prepare a negative declaration, mitigated negative declaration, or a project-level EIR. An initial study checklist is used to determine if a subsequent activity is within the scope of the program EIR and if not, what type of CEQA document is needed to address its effects.

As a program EIR, this document uses appropriately programmatic thresholds of significance as compared to the project-level thresholds that might be used for an EIR on a specific development project. Because the 2040 General Plan EIR is broad and general, it may not be ripe for consideration of environmental impacts that may occur on individual parcels or in connection with other projects that may be consistent with the 2040 General Plan. The process described above, initiated with preparation of an initial study, provides a road map for consideration of subsequent projects and the associated CEQA documentation.

1.3 SCOPE AND CONTENT OF THIS EIR

This chapter (1) provides an overview of the general plan; (2) summarizes the CEQA process; (3) summarizes the scope and content of the EIR; (4) lists lead, responsible, and trustee agencies for the EIR; and (5) provides a synopsis of the environmental review process required under CEQA. The contents of other EIR chapters are as follows:

- ▶ Chapter 2, “Executive Summary,” summarizes the conclusions of the draft EIR.
- ▶ Chapter 3, “Project Description,” provides a detailed discussion of the 2040 General Plan.
- ▶ Chapter 4, “Environmental Impact Analysis,” describes the potential environmental effects associated with implementation of the 2040 General Plan.
- ▶ Chapter 5, “Cumulative Impacts,” includes an analysis of the potential cumulative environmental effects associated with the 2040 General Plan for each of the resources analyzed in Chapter 4.
- ▶ Chapter 6, “Alternatives,” discusses alternatives to the 2040 General Plan, including the CEQA-required “no project” alternative.
- ▶ Chapter 7, “Other CEQA Considerations,” discusses issues such as growth inducement and significant irreversible environmental effects.
- ▶ Chapter 8, “References,” lists informational sources for the EIR.
- ▶ Chapter 9, “Report Preparers,” lists persons involved in the preparation of the document.

1.3.1 Notice of Preparation

A notice of preparation (NOP) of a draft EIR was circulated to the public on January 14, 2019, in accordance with the State CEQA Guidelines. The NOP, included in Appendix A, indicated that the following issues would be further evaluated in the draft EIR:

- | | |
|-------------------------------------|----------------------------------|
| ▶ Aesthetics, | ▶ Land Use/Planning, |
| ▶ Agriculture and Forest Resources, | ▶ Mineral Resources, |
| ▶ Air Quality, | ▶ Noise, |
| ▶ Biological Resources, | ▶ Population/Housing, |
| ▶ Cultural Resources, | ▶ Public Services, |
| ▶ Energy, | ▶ Recreation, |
| ▶ Geology/Soils, | ▶ Transportation, |
| ▶ Greenhouse Gas Emissions, | ▶ Tribal Cultural Resources, |
| ▶ Hazards/Hazardous Materials, | ▶ Utilities/Service Systems, and |
| ▶ Hydrology/Water Quality, | ▶ Wildfire. |

In response to the NOP, the County received 24 written comments. Oral and written comments were also received during the public scoping meeting on January 30, 2019. These comments are included in Appendix A and are addressed as appropriate in the analyses contained in the various sections of Chapter 4, “Environmental Impact Analysis.”

AREAS OF KNOWN CONTROVERSY

Key areas of concern identified during the public outreach process through responses to the NOP and comments received at the January 2019 scoping meeting were focused on two primary areas of concern: (1) climate change and greenhouse gases, and (2) the effects of continued oil and gas extraction (including secondary effects related to climate change, air quality, water quality, water supply, traffic, noise, odors, aesthetics, and hazards).

Other concerns raised through scoping include the following:

- ▶ visual impacts on State Route (SR) 150 and SR 126;
- ▶ conservation of open space and scenic areas;
- ▶ pollution and health risks attributed to agricultural operations;
- ▶ concerns regarding endangered and threatened wildlife species;
- ▶ sensitive natural habitats including riparian and aquatic habitats;
- ▶ effects of development on wildlife movement corridors;
- ▶ concerns related to Native American tribal consultation regarding the preservation of tribal cultural resources pursuant to Assembly Bill 52 (2014) and Senate Bill 18 (2004);
- ▶ noise generated by airports, rail, and agriculture operations;
- ▶ concerns regarding groundwater infiltration, surface water quality, and flooding;
- ▶ affordable housing, adequate workforce housing, and consistency with the County's Regional Housing Needs Assessment;
- ▶ concerns regarding land use and zoning, conformance with the Guidelines for Orderly Development, and consistency with the Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy;
- ▶ equitable mobility options for people who are economically, socially, or physically disadvantaged;
- ▶ balancing analysis of both level of service (LOS) and vehicle miles traveled (VMT); and
- ▶ the need to actively promote walking, bicycling, and transit as alternatives to driving and a strategy to reduce VMT and greenhouse gas emissions.

1.4 LEAD, RESPONSIBLE, AND TRUSTEE AGENCIES

The County of Ventura is the lead agency under CEQA for this EIR because it has discretionary authority to determine whether or how to approve the 2040 General Plan.

Responsible agencies are agencies other than the lead agency that have discretionary power over carrying out or implementing a specific component of the general plan or for approving a project (such as an annexation) that implements the goals and policies of the general plan. Agencies that may be responsible agencies include: the California Department of Transportation, which has responsibility for approving future improvements to the state highway system; the Department of Conservation, which has responsibility for approving mining Reclamation Plans pursuant to the Surface Mining and Reclamation Act; and the Local Agency Formation Commission of Ventura County, which has responsibility for approving any annexations within the county that might occur over the life of the 2040 General Plan.

Trustee agencies have jurisdiction over certain resources held in trust for the people of California but do not have legal authority over approving or carrying out the project. The California Department of Fish and Wildlife is a trustee agency due to the potential impacts to biological resources, the California Department of Parks and Recreation is a trustee agency due to the presence of state parks in the county, and the California State Lands Commission would be a trustee agency if development were to occur on state-owned sovereign lands such as state schools or tide and submerged lands along the coast.

1.5 REVIEW OF THIS DRAFT EIR

Upon completion of this draft EIR, the County filed a notice of completion (NOC) with the Governor's Office of Planning and Research to begin the public review period (Public Resources Code Section 21161). Concurrent with the NOC, this draft EIR has been distributed to responsible and trustee agencies, other affected agencies, surrounding counties, cities within the county, and interested parties, as well as to all parties requesting a copy of the draft EIR, in accordance with Public Resources Code Section 21092(b)(3).

During the 45-day public review period, the draft EIR, including the technical appendices, is available for review at the following locations:

- ▶ 2040 General Plan Update webpage at <https://vc2040.org/>;
- ▶ County of Ventura, Resource Management Agency, Planning Division Public Counter, 3^d Floor, Hall of Administration, 800 S. Victoria Avenue, Ventura, CA, 93009, between the hours of 7:30 a.m. to 4:30 p.m., Monday through Friday;
- ▶ The Planning Division website at <http://vcrma.org/divisions/planning> (select "CEQA Environmental Review").

Compact Disks of the Draft EIR have been provided to the following libraries:

- ▶ Albert H. Soliz Library (2820 Jordan Street, Oxnard, CA 93036);
- ▶ Avenue Library (606 North Ventura Ave., Ventura, CA 93001);

- ▶ E.P. Foster Library (651 East Main St., Ventura, CA 93001);
- ▶ Fillmore Library (502 2nd St., Fillmore, CA 93015);
- ▶ Hill Road Library (1070 S. Hill Rd., Ventura, CA 93003);
- ▶ Meiners Oaks Library (114 North Padre Juan, Ojai, CA 93023);
- ▶ Oak Park Library (899 North Kanan Rd., Oak Park, CA 91377);
- ▶ Oak View Library (555 Mahoney Ave., Oak View, CA 93022);
- ▶ Ojai Library (111 East Ojai Ave., Ojai, CA 93023);
- ▶ Piru Library (3811 Center St., Piru, CA 93040);
- ▶ Ray D. Prueter Library (510 Park Ave., Port Hueneme, CA 93041); and
- ▶ Saticoy Library (1292 Los Angeles Ave., Ventura CA 93004).

Agencies, organizations, and interested parties have the opportunity to comment on the draft EIR during the public review period. A public review draft of the 2040 General Plan will also be released concurrent with the draft EIR.

Written comments on this draft EIR should be addressed to:

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 S. Victoria Avenue, L #1740
Ventura, CA 93009-1740

Alternatively, you may email your comments to GeneralPlanUpdate@ventura.org.

Upon completion of the public review and comment period, a final EIR will be prepared that will include both written and oral comments on the draft EIR received during the public-review period, responses to those comments, and any revisions to the draft EIR made to address public comments. The draft EIR and final EIR together will comprise the EIR for the 2040 General Plan. Before adopting the 2040 General Plan, the lead agency is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the lead agency.

Upon certification of an EIR, the lead agency makes a decision on the project analyzed in the EIR. A lead agency may: (a) disapprove a project because of its significant environmental effects; (b) require changes to a project to reduce or avoid significant environmental effects; or (c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (State CEQA Guidelines Sections 15042 and 15043).

In approving a project, for each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: (a) the project has been changed to avoid or substantially reduce the magnitude of the impact; (b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or (c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (State CEQA Guidelines Section 15091). Per Public Resources Code Section 21061.1, feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and technological factors.

If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision and explains why the project's benefits outweigh the significant environmental effects (State CEQA Guidelines Section 15093).

When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects (State CEQA Guidelines Section 15091[d]).

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2 EXECUTIVE SUMMARY

2.1 INTRODUCTION

This summary is provided in accordance with California Environmental Quality Act Guidelines (State CEQA Guidelines) Section 15123. As stated in Section 15123(a), “an EIR [environmental impact report] shall contain a brief summary of the proposed action and its consequences. The language of the summary should be as clear and simple as reasonably practical.” As required by the Guidelines, this chapter includes (1) a summary description of the 2040 General Plan, (2) a synopsis of environmental impacts and mitigation measures (Table 2-4), (3) identification of the alternatives evaluated and of the environmentally superior alternative, and (4) a discussion of the areas of controversy associated with the project.

2.2 SUMMARY DESCRIPTION OF THE 2040 GENERAL PLAN

2.2.1 Geographic Extent of the Plan Area

Ventura County is one of the six counties that collectively form the Central Coast region of California. It was created on January 1, 1873, when it separated from Santa Barbara County. Ventura County covers 1.2 million acres bordered by the Pacific Ocean to the southwest, Los Angeles County to the southeast and east, Santa Barbara County to the west, and Kern County to the north. The Los Padres National Forest accounts for approximately 574,000 acres, or 47 percent of the county’s total land area. This includes privately owned inholdings surrounded by Los Padres National Forest which are not a part of the national forest. Outside of the Los Padres National Forest, there are approximately 528,000 acres of land in the unincorporated area (43 percent) and 121,000 acres in the county’s 10 incorporated cities (10 percent). In addition to the mainland part of the county, two of the eight Channel Islands off the coast (San Nicolas Island and Anacapa Island) are also part of Ventura County. Anacapa Island is approximately 700 acres and is located within the Channel Islands National Park. San Nicolas Island encompasses approximately 14,000 acres and is located 65 miles south of Naval Base Ventura County Point Mugu. Managed by the US Navy, San Nicolas Island serves as a launch platform and observation platform for short- and medium-range missile testing. Anacapa Island covers approximately 3,200 acres and is located 14 miles from the coast of Ventura County; it is one of the most visited islands of Channel Islands National Park because of its proximity to the mainland.¹

The County of Ventura has land use regulatory authority over most unincorporated land in the county, but lacks land use authority within the incorporated cities in the county: Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Santa Paula, Simi Valley, Thousand Oaks, and Ventura. The County also does not have land use authority over land in the unincorporated area that is 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), except for portions of state parks and other state land located in the coastal zone. Under State law, the

¹ Note: the 2040 General Plan and associated mapping focus on the mainland areas of the county. This EIR follows the same convention. San Nicolas is designated State or Federal Facility. Anacapa Island is designated Open Space.

County has land use authority over land owned or managed by special districts in the unincorporated area (e.g., cemetery districts, water districts), subject to limited exceptions.

2.2.2 Overview of the 2040 General Plan

The 2040 General Plan is a comprehensive effort to update the existing General Plan and respond to current local and regional conditions, as well as changes in state law that may not have been in place when the existing General Plan was last updated in 2005. It clarifies and articulates the County's intentions with respect to the rights and expectations of the various communities, including residents, property owners, and businesses. Through the 2040 General Plan, the County informs these groups of its goals, policies, and standards, thereby communicating expectations of the public and private sectors for meeting community objectives. In addition, the general plan includes Area Plans that specifically address growth and resource concerns within nine of the county's identified communities.

The 2040 General Plan is organized to satisfy the state's required general plan elements (or chapters). It addresses the state's mandatory elements (i.e., land use, circulation, housing, conservation, open space, noise, and safety), plus the new requirements for air quality and environmental justice, and three new optional elements: water, agriculture, and economic development. Each of the general plan elements and Area Plans contain goals, policies, and implementation programs, which constitute the County of Ventura's policies for land use, development and environmental quality. These terms are defined as follows:

- ▶ **Goal**— A statement that describes in general terms a desired future condition or end state. Goals describe ideal future conditions for a topic and tend to be very general and broad.
- ▶ **Policy**— A clear and unambiguous statement that guides a specific course of action for decision-makers to achieve a desired goal.
- ▶ **Implementation Program**—An action, procedure, program, or technique that carries out general plan policy.

The current, comprehensive update process was initiated in 2015. To reach a wide variety of county residents and stakeholders, Ventura County Resource Management Agency, Planning Division staff conducted extensive community outreach to secure initial public, focus group, and advisory body input on the development of the draft 2040 General Plan. The County gathered community input through the following methods:

- ▶ Public Opinion Survey;
- ▶ Workshops, Open Houses, and Informational Sessions;
- ▶ Public Presentations;
- ▶ Project Website – www.VC2040.org;
- ▶ Technical Advisory Committee;
- ▶ Focus Groups;
- ▶ Agricultural Policy Advisory Committee;

- ▶ Municipal Advisory Councils and Piru Neighborhood Council; and
- ▶ Planning Commission and Board of Supervisors Meetings, Working Sessions, and Hearings.

During 2018, the public and the County's Planning Commission and Board of Supervisors engaged in an alternatives process designed to guide development of the 2040 General Plan. The purpose of the alternatives process was to consider future land use and policy options and help the Planning Commission and Board of Supervisors select a Preferred Alternative that provided the framework for preparing the 2040 General Plan. The Alternatives Report was presented to the Board of Supervisors and Planning Commission during joint work sessions in July and November 2018 (Ventura County 2018). The Alternatives Report established a framework for the 2040 General Plan by providing direction on the Vision Statement and Guiding Principles; Proposed General Plan Organization; Preferred Land Use Alternative; and Policy Choices.

The preliminary public review draft of the 2040 General Plan was released for public review on May 9, 2019. Following public input and workshops with the Planning Commission and Board of Supervisors, a public draft 2040 General Plan was released for public review in January 2020.

2.2.3 General Plan Objectives

Section 15124 of the State CEQA Guidelines requires an EIR to include a statement of project objectives. The objectives assist the County, as lead agency, in developing a reasonable range of alternatives to be evaluated in this draft EIR. The project objectives also aide decision makers in preparing findings and, if necessary, a statement of overriding considerations. The statement of objectives also includes the underlying purpose of the project.

For this draft EIR, the project objectives are defined as being expressed by the Guiding Principles contained in Section 1.2 of the 2040 General Plan. The project objectives are defined as follows:

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

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

2.2.4 Relationship to Other Plans and Regulations

A general plan is distinct from a zoning ordinance and other land use planning documents. Although all these documents regulate how land may be used and developed, they do so in different ways. A general plan has a long-term outlook that identifies the types of development that are allowed, the spatial relationships among land uses, and the general pattern of future development. A zoning ordinance implements a general plan by regulating development through specific standards, such as lot size, building setback, setting allowable uses, or through infrastructure improvements and financing. Development must not only meet the specific requirements of the zoning ordinance but also the broader policies set forth in the general plan.

There are also nine Area Plans that are incorporated and made part of the 2040 General Plan. An Area Plan specifies the distribution, location, types, and intensity of land uses, and provides specific policies concerning development in a distinct geographical area. The goals, policies, and programs of an Area Plan are designed to supplement, not duplicate, the General Plan.

LAND USE PLANNING CONTEXT AND GROWTH MANAGEMENT

One of Ventura County's distinguishing characteristics is its open space and scenic character. The County is dedicated to directing urban development to cities and existing unincorporated communities to preserve its working and rural landscapes, agricultural lands, scenic vistas, natural resources, and recreational opportunities. The County has a direct role in maintaining agricultural, rural, and open space areas and shaping the character of urban development. At the same time, the County seeks to support and encourage the cities in their land use planning efforts to ensure that a quality living environment is provided for all existing and future county residents.

Ventura County is unique in California because of the successful countywide land use planning efforts that have preserved the county's open space and scenic character, including the Guidelines for Orderly Development, greenbelt agreements, and the Save Open Space & Agricultural Resources (SOAR) initiative measure.

2.2.5 Structure and Content of the General Plan

The 2040 General Plan sets forth the goals and policies based on the Vision Statement and Guiding Principles that will guide future land use and resource decisions within the unincorporated areas of the county and identifies the implementation programs required to carry out the goals and policies of the 2040 General Plan. The 2040 General Plan also includes land use designations and a Land Use Diagram that specifies the allowable uses of land (e.g., residential, commercial) throughout the unincorporated area.

The 2040 General Plan addresses topics and issues pursuant to state requirements adopted since the existing general plan was approved in 2005. These include environmental justice, transportation issues such as assessing vehicle miles traveled and analyzing transportation systems more holistically (e.g., "Complete Streets"), and wildfire hazards. It is designed to maintain consistency with the Guidelines for Orderly Development, greenbelt agreements, and SOAR measures for Ventura County's unincorporated areas and ten incorporated cities. The 2040 General Plan also includes a Climate Action Plan which, among other things, will include a vulnerability analysis and describe how the County plans to reduce greenhouse gas (GHG) emissions and adapt to a changing climate.

As part of the General Plan update process, the County assessed the goals, policies, and programs in the existing General Plan and the County Area Plans. Seven of the Area Plans (El Rio/Del Norte, Lake Sherwood/Hidden Valley, North Ventura Avenue, Oak Park, Ojai Valley, Piru, and Thousand Oaks) would be refined as part of the 2040 General Plan. These seven area plans were reviewed and assessed to compare the Area Plan goals, policies, and programs with 2040 General Plan goals, policies, and programs to ensure internal consistency. The proposed refinements typically take the form of applying a common writing style and order of presentation to each Area Plan while maintaining the original intent. A few policies are proposed for removal from individual Area Plans and incorporation into one of the 2040

General Plan elements. This change would maintain the policy and broadened its coverage from a single Area Plan to the entire unincorporated county. All changes proposed in the 2040 General Plan are presented in a legislative format that tracks the changes made.

The remaining two Area Plans (Coastal and Saticoy) were not updated as part of the 2040 General Plan process.

GENERAL PLAN ELEMENTS

The 2040 General Plan elements are organized as follows: Land Use and Community Character Element; Housing Element; Circulation, Transportation, and Mobility Element; Public Facilities, Services, and Infrastructure Element; Conservation and Open Space Element; Hazards and Safety Element; Agriculture Element; Water Resources Element; and Economic Vitality Element. Each element contains goals and policies that the County will use to guide future land use, development, resource management, and environmental protection decisions. The 2040 General Plan is intended to provide a more concise and clear policy statement for the County, compared to the existing General Plan, by reducing redundant policies (similar policies that are presented in several elements and/or area plans), and by removing items that are simply restatements of requirements specified in state or federal regulations.

LAND USE DIAGRAM

The purpose of the 2040 General Plan Land Use Diagram is to guide the general distribution, location, and extent of the various land use designations throughout the county. The land use designations established in the 2040 General Plan are listed in Tables 2-1 and 2-2.

The existing General Plan contains a simplified set of six land use designations and one overlay land use designation, which describe the purpose of the designation and allowed uses. While a few land use designations prescribe density, intensity, and lot size, the key designations of Existing Community and Urban do not. The existing General Plan land use designations are broad categories that lack clear details to distinguish between separate land uses, such as residential, commercial, and industrial.

To address this, the 2040 General Plan would establish 15 land use designations that provide more detailed information on the types of land uses (e.g., commercial, industrial, residential) that would be allowable within areas currently designated as Existing Community and Urban land use designations. The 2040 General Plan land use designations would be consistent with land uses and densities/intensities allowed under the current (2018) zoning designations for each affected parcel. The proposed 2040 General Plan land use designations replace the Existing Community and Urban land use designations of the existing General Plan with a new set of designations that clearly distinguish the land uses allowed and set forth maximum development density and intensity standards.

Where the existing General Plan contained minimum lot size requirements, these are maintained in the 2040 General Plan. Proposed new land use designations that do not have a comparable minimum lot size in the existing General Plan would incorporate the smallest minimum lot size of the compatible zoning designation.

As part of the 2040 General Plan, several key designations are maintained as presented in the existing General Plan. All lands in the existing General Plan with a land use designation of Agricultural, Open Space, or Rural located outside of Existing Community and Urban designated areas are maintained unchanged. This ensures the 2040 General Plan remains consistent with the SOAR initiative. Relative to the Guidelines for Orderly Development, the boundaries of the current Existing Community and Urban designations were protected as new area designations in the 2040 General Plan. Also maintained are the lands designated as State and Federal Facility, which is applied to parcels owned by the state or federal government and are outside of the County's land use jurisdiction. The only change to this designation is its name, which in the 2040 General Plan is under the term "State, Federal, and Other Public Lands."

Two changes are also proposed for lands within or adjacent to the incorporated cities in the county. As the County does not have land use authority over lands within the cities, these areas are noted as "City" on the 2040 General Plan Land Use Diagram and not given a land use designation. The final land use designation change is the proposed removal of the Urban Reserve Overlay. This overlay is replaced by a policy that references the use of adopted spheres of influence to provide the same geographic boundary.

Table 2-1 provides the land use designations that would be established and used by the 2040 General Plan.

Table 2-1 Land Use Designation General Development Standards

Acronym	Land Use Designation	Maximum Density / Intensity	Minimum Lot Size	Maximum Lot Coverage ¹
Rural, Agricultural, and Open Space Designations				
RUR	Rural ²	1 du/2 ac	2 acres, or zone suffix equal to or more restrictive than 2 acres	25%
ECU-R ³	ECU-Rural	1 du/2 ac	2 acres	25%
AG	Agricultural ²	1 du/40 ac	40 acres	5%
ECU-A ³	ECU-Agricultural	1 du/40 ac	40 acres	5%
OS	Open Space ²	1 du/parcel	10 acres, or 20 acres if contiguous w/Agricultural	5%
ECU-OS ³	ECU-Open Space	1 du/parcel	10 acres, or 20 acres if contiguous w/Agricultural	5%
Residential Designations				
VLDR	Very Low Density Residential	4 du/ac	10,000 SF	n/a
LDR	Low-Density Residential	6 du/ac	6,000 SF	n/a
MDR	Medium-Density Residential	14 du/ac	3,000 SF	n/a
RHD	Residential High-Density	20 du/ac	No minimum	n/a
RPD	Residential Planned Development	20 du/ac	No minimum	n/a
CRPD	Coastal Residential Planned Development	36 du/ac	No minimum	n/a
RB	Residential Beach	36 du/ac	1,500 SF	n/a

Acronym	Land Use Designation	Maximum Density / Intensity	Minimum Lot Size	Maximum Lot Coverage ¹
Mixed Use, Commercial, and Industrial Designations				
MU	Mixed Use	20 du/ac; 60% lot coverage	No minimum	60%
C	Commercial	60% lot coverage	No minimum	60%
CPD	Commercial Planned Development	60% lot coverage	No minimum	60%
I	Industrial	50% lot coverage	10,000 SF	50%
Other Designations				
PR	Parks & Recreation	n/a	None	5%
P	State, Federal, Other Public Lands ²	n/a	None	n/a

Notes: ac = acre; du = dwelling unit; n/a = not applicable; SF = square foot.

¹ Maximum lot coverage is per applicable County zoning classification.

² Existing General Plan land use designations that would be retained.

³ The acronym "ECU-" preceding a designation name refers to land use designations that apply only within the boundaries of an Existing Community or Urban area designation (boundary) as defined in 2040 General Plan Policies LU-1.2 and LU-2.1.

The approximate acreage and percent of total acreage in the unincorporated portions of the county for each land use designation is also provided in Table 2-2.

Table 2-2 Land Use Designation Descriptions and Acreage in the Plan Area

Land Use Designation	Description	Acreage	Percent of County Total
Rural	Identifies areas suitable for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes. The areas considered for inclusion in the Rural designation are existing clusters of rural development and areas deemed appropriate for future rural residential development.	8,764	<1%
ECU-Rural	Provides a physical transition between the outer edges of an Existing Community or Urban Area and nearby agricultural and open space areas and uses. Typical building types include large-lot, single-family homes in a rural setting.	1,114	<1%
Agricultural	Applies to irrigated lands suitable for the cultivation of crops and the raising of livestock.	91,485	9%
ECU-Agricultural	Applies to irrigated lands suitable for the cultivation of crops and the raising of livestock within the boundaries of an Existing Community designated area.	102	<1%
Open Space	Applies to any parcel or area of land or water which is largely unimproved and devoted to an open-space use, as defined under Section 65560 of the Government Code.	917,716	88%
ECU-Open Space	Provides for areas with significant natural resources that should remain in open space, used for recreation, or preserved and used for resource production (e.g., mining) and are located within the boundaries of an Existing Community designated area.	233	<1%
Very Low Density Residential	Provides a physical transition between the outer edges of an Existing Community or Urban Area and nearby agricultural and open space areas and uses. Typical building types include large-lot, single-family homes in a rural setting.	7,572	<1%
Low-Density Residential	Provides for a variety of single-family homes and neighborhoods. Typical building types include small-lot, single-family homes, and other similar housing types, such as second units.	1,050	<1%

Land Use Designation	Description	Acreage	Percent of County Total
Medium-Density Residential	Provides a transition from lower density, single-family areas and more intensely developed residential and commercial areas; generally, applies to residential neighborhoods and central areas within Existing Communities and Urban Areas. Development at the higher end of the density allowed should occur along major transportation routes or adjacent to commercial centers. Typical building types include one- to three-story attached single-family dwellings and lower density multifamily developments.	25	<1%
Residential High-Density	Provides for residential development in more intensely developed residential and commercial areas. Development at the higher end of the density allowed should occur along major transportation routes and within major commercial centers. Generally, applies to central areas within Existing Communities and Urban Areas. Typical building types include one- to three-story multifamily developments.	13	<1%
Residential Planned Development	Provides areas for residential communities which would be developed using modern land planning and unified design techniques that can be adjusted to better fit the unique needs of the project site.	1,732	<1%
Coastal Residential Planned Development	Provides areas for residential communities which would be developed using innovative site planning techniques. Generally, applies to areas appropriate for modern residential development within the boundaries of an Existing Community designated area in the coastal zone.	23	<1%
Residential Beach	Provides for small-lot, beach-oriented residential communities. Generally, applies to areas appropriate for high-density residential development within the boundaries of an Existing Community designated area in the coastal zone.	185	<1%
Mixed Use	Provides for the development of activity centers that contain a mix of compatible and integrated commercial, office, residential, civic, and/or recreational uses. Developments should be located on an arterial or higher roadway classification and include appropriate pedestrian and bicycle facilities. Typical building types include one- to three-story horizontal or vertical mixed-use structures.	20	<1%
Commercial	Provides for a mix of retail and service uses that are typically needed by residents in rural communities and surrounding agricultural operations. Developments may include a mix of uses and should be located on a County-defined Minor Collector or higher classification roadway and include pedestrian and bicycle facilities. Typical building types include one- to two-story commercial structures.	161	<1%
Commercial Planned Development	Provides areas for vibrant commercial centers which would be developed utilizing modern land planning and unified design techniques that can be adjusted to better fit the unique needs of the project site. Areas with this designation provide a flexible regulatory procedure in order to encourage the development of coordinated, innovative, and efficient commercial sites and to provide areas for a wide range of commercial retail and business uses, including stores, shops, and offices supplying commodities or performing services for the surrounding community.	158	<1%
Industrial	Provides for a range of industrial employment-generating uses, including production, assembly, warehousing, and distribution, that are conducted within enclosed buildings or in appropriately sited and screened outdoor work spaces that are designed for compatibility with surrounding land uses. Limited to areas served by, or planned to be served by, public water, wastewater, and drainage systems. Developments must be located on a County-defined Minor Arterial or higher classification roadway.	1,408	<1%
Parks & Recreation	Provides for parks and recreation facilities and associated recreation uses. Typically, these areas are characterized by a high degree of open space, and a limited number of buildings. Recreational facilities frequently include sports fields, playground equipment, picnic areas, sitting areas, concession businesses, open turf and natural areas, trails, and golf courses. Connectivity to surrounding areas via pedestrian and bicycle facilities is desired.	0 ¹	0%

Land Use Designation	Description	Acreage	Percent of County Total
State, Federal, Other Public Lands	This designation applies to state- and federally-owned parks, forests, rangelands, coastal resources, and/or recreation areas. For state land within the coastal zone, the County has land use authority except for land under the California Coastal Commission's original jurisdiction (i.e., beaches and tidelands). For all other areas within this designation the County has no land use authority. Areas so designated include land under federal or state ownership on which governmental facilities are located. Principal uses of these areas include: continued provision of public recreational facilities and access; multi-use management where applicable; support for rangeland activities, and interconnection or coordination of state, federal, and local facilities and programs when possible.	8,085	<1%
Total		1,039,847	100%

¹ There is no land currently in the Parks & Recreation designation. This is a new designation that can be applied to parcels within Existing Community, Area Plans, and Urban Centers within Areas of Interest that provide for parks and recreation facilities and associated recreation uses.

As shown in Table 3-2, the land use diagram of the 2040 General Plan would concentrate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). The Existing Community area designation includes existing land uses that have been developed with urban building intensities and urban land uses. The Urban area designation refers to areas with commercial and industrial uses and residential uses where the building intensity is greater than one principal dwelling unit per two acres. These areas are generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101.

Under the 2040 General Plan relatively higher intensity residential (Very Low Density, Low Density, Medium Density, Residential Planned Development, Coastal Planned Development, Residential Beach), commercial (Commercial and Commercial Planned Development), mixed use, and industrial land use designations would apply to approximately 1.2 percent of land in the unincorporated county. The types of future development that could occur in these land use designations include but are not limited to small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would remain unchanged from the existing General Plan and allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as composting operations, greenhouses, principal and accessory structures related to agriculture, and oil and gas wells. The areas considered for inclusion in the Rural designation are existing clusters of rural development and areas deemed appropriate for future rural residential development up to a maximum density of one dwelling unit per 2 acres. The Rural land use designation would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county is designated as either Open Space or Agriculture. The Open Space land use designation would be unchanged from the existing General Plan (covering 88 percent of the unincorporated county), allowing a minimum parcel

size of 10 acres and one dwelling unit per parcel (see Table 3-1). The Open Space land use designation would also allow for development of other uses such as composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells.

An additional nine percent of the plan area is, and would remain, designated as Agriculture. The Agriculture land use designation would also remain unchanged from the existing General Plan, allowing for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. This designation is applied to irrigated lands suitable for the cultivation of crops and the raising of livestock and would also allow for other uses such as greenhouses, principal and accessory structures related to agriculture, and composting operations.

The remaining approximately 0.8 percent of land in the unincorporated county would be designated as State, Federal, Other Public Lands, which applies to land under federal or State ownership on which governmental facilities are located. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

GROWTH PROJECTIONS

Growth projections employed in the preparation of the 2040 General Plan were estimated for 2020, 2030, and 2040 using county-specific demographic projections prepared by Southern California Association of Governments (SCAG) for the 2020 Regional Transportation Plan and Sustainable Communities Strategy (SCAG 2017). As indicated in the SCAG population growth forecasts presented in Table 2-3, below, from 2015 to 2040 the growth in population and households (i.e., occupied housing units) is anticipated to be approximately four percent and employment growth is expected to be approximately nine percent.

Table 2-3 Growth Forecast for Unincorporated Ventura County, 2015–2040

Demographic	2015	2020		2030		2040	
	Number	Number	Percent Increase from 2015	Number	Percent Increase from 2015	Number	Percent Increase from 2015
Population	97,733	99,755	2.1	100,918	3.3	101,832	4.2
Employment	32,889	32,988	0.3	34,556	5.1	35,875	9.1
Households	32,191	32,446	0.08	32,959	2.4	33,472	4.0

Notes: Employment and housing growth rates for 2040 interpolated from reported years 2035 and 2045

Source: Calculated by Ascent Environmental using data provided by the SCAG (2017)

Historically, most development has occurred within areas designated as Existing Community and Urban in the existing General Plan land use diagram. For example, between 2006 and 2018, an estimated 44 percent of new residential development occurred within areas designated as Existing Community or Urban. These are areas where higher-intensity residential development, a mixture of commercial and industrial uses, and additional infrastructure and services are most readily available to accommodate such growth. The remainder of the residential development during this period occurred in areas designated Rural (9 percent), Agricultural (23 percent), and Open Space (24 percent). Lower development trends in areas designated Rural, Agriculture, and Open Space are presumed to be based on numerous factors that vary from site to site, but include larger minimum lot sizes; lot coverage

restrictions; limited access to water, utilities and infrastructure; fire code issues such as lack of secondary access; or a combination of these and other factors which can effectively prohibit or significantly increase the cost of new development in these areas.

Based on the similarities between the land use diagrams of the existing General Plan and 2040 General Plan and other factors influencing development, the County anticipates that allocation of future residential development would substantially follow historical trends with implementation of the 2040 General Plan. For example, to the extent historical residential development trends continue into the future, approximately 564 of the 1,281 additional households forecast in the unincorporated county between 2015 and 2040 (see Table 3-3) would be developed within areas of the county designated for residential, industrial, and mixed land uses. These areas account for approximately 1 percent of the total acreage of the unincorporated county area. In this example the remainder of the forecast residential development would be spread throughout the approximately 98 percent of the County's unincorporated areas in agriculture, open space, and rural land use designations (see Table 3-2).

2.3 ENVIRONMENTAL IMPACTS AND REVIEW PROCESS

This draft EIR has been prepared pursuant to the CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Section 15000, et seq.) to evaluate the physical environmental effects of the 2040 General Plan. The County of Ventura is the lead agency. The existing conditions against which potential environmental impacts are evaluated are based on the environmental and regulatory setting information published in the January 2020 Background Report, which is included in this draft EIR as Appendix B. The Background Report serves as the basis for the environmental and regulatory setting of this draft EIR. Where changes to the environmental or regulatory setting (e.g., new information, regulatory changes) are not included in the Background Report and these changes are relevant to understanding the 2040 General Plan's potential impacts, additional background information is provided in the draft EIR resource section. The reader is referred to the Background Report for all other setting information.

This draft EIR analyzes the significant environmental impacts of the 2040 General Plan, mitigation measures to avoid or reduce these impacts, and alternatives to the 2040 General Plan. It was prepared to disclose this information to decision makers, members of the public and public agencies, so that informed decisions can be made about the 2040 General Plan. CEQA requires that decision makers make informed decisions on a project, considering the information presented in the EIR, along with social, economic, and other factors.

The Ventura County Board of Supervisors has the principal responsibility for approving and carrying out the 2040 General Plan and for ensuring that the requirements of CEQA have been met. After the draft EIR public-review process is complete and the final EIR is prepared, the Board of Supervisors will consider whether to certify the final EIR and adopt the 2040 General Plan.

Table 2-4, presented at the end of this chapter, provides a summary of the environmental impacts for the 2040 General Plan. The table provides the level of significance of the impact without mitigation measures, recommended mitigation measures to avoid or substantially lessen significant impacts, and the level of significance of the impact with mitigation measures.

Upon certification of an EIR, the lead agency makes a decision on the project analyzed in the EIR. A lead agency may: (a) disapprove a project because of its significant environmental effects; (b) require changes to a project to reduce or avoid significant environmental effects; or (c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (State CEQA Guidelines Sections 15042 and 15043).

In approving a project, for each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: (a) the project has been changed to avoid or substantially reduce the magnitude of the impact; (b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or (c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (State CEQA Guidelines Section 15091). Per Public Resources Code Section 21061.1, feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and technological factors.

If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision and explains why the project's benefits outweigh the significant environmental effects (State CEQA Guidelines Section 15093).

When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects (State CEQA Guidelines Section 15091[d]).

2.4 ALTERNATIVES

Chapter 6, "Alternatives," includes an evaluation of four alternatives to the 2040 General Plan:

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

The No Project Alternatives fulfills the CEQA requirement to compare the relative impacts of not approving the 2040 General Plan to the anticipated effects of adopting and implementing the 2040 General Plan. The No Project Alternative assumes that the current 2005 General Plan land use map and the existing policies and programs would remain in effect until 2040.

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

development further, encouraging growth within Existing Community and Urban area designations that are contiguous with incorporated cities along the Highway 101 corridor (i.e., areas within Existing Community and Urban area designations that are adjacent to the cities of Ventura, Oxnard, Camarillo, and Thousand Oaks). Under these alternatives the county's forecasted population, housing, and job growth would be the same as under the 2040 General Plan and accommodated within these areas by revising the land use diagram to provide appropriate medium and high-density residential designations and non-residential designations (e.g., mixed use, commercial, industrial).

Finally, the Zero Net Energy Alternative is proposed to address the county's contribution to GHG emissions. This alternative would include the same policies and programs and land use diagram as the 2040 General Plan but would also include: 1) a zero-net energy requirement for new construction, 2) a program to retrofit County-owned buildings, and 3) an incentive program that encourages retrofit of privately-held buildings. Measures to achieve zero net energy for the existing building stock could include providing major financial incentives or subsidies for property owners to make energy efficiency improvements (e.g., appliances, windows, insulation, equipment, technology) and install on-site renewable energy systems; adopting ordinances to require energy efficiency or on-site renewable energy system improvements at specified trigger points, such as the point-of-sale or during application for major building renovations. Measures to achieve zero net energy for new buildings could include adopting an ordinance requiring zero net energy for all new buildings.

2.4.1 Environmentally-Superior Alternative

The Dense Cores Alternative (Alternative 3) is the environmentally superior alternative because it would reduce most impacts of the 2040 General Plan. Alternative 3 would reduce overall impacts in 11 of the 17 resource areas evaluated in this draft EIR by focusing the development anticipated to accommodate population growth in a manner that would limit effects on most of the county's character and aesthetics, reduce the area of potential ground disturbance, and promote the most efficient use of transportation energy by creating compact development near transportation corridors.

2.5 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

A notice of preparation (NOP) of a draft EIR was circulated to the public on January 14, 2019, in accordance with the State CEQA Guidelines. A public scoping meeting was held on January 30, 2019. The purpose of the NOP and the scoping meeting was to provide notification that an EIR for was being prepared for the project and to solicit input on the scope and content of the environmental document. The NOP and responses to the NOP are included in Appendix A of this draft EIR. Key concerns and issues that were expressed during the scoping process included the following:

Key areas of concern identified during the public outreach process through responses to the NOP and comments received at the January 2019 scoping meeting were focused on two primary areas of concern: climate change and GHGs, and the effects of continued oil and gas extraction including secondary effects related to climate change, air quality, water quality, water supply, traffic, noise, odors, aesthetics, and hazards.

Other concerns raised through scoping include the following:

- ▶ visual impacts on State Route (SR) 150 and SR 126;
- ▶ conservation of open space and scenic areas;
- ▶ pollution and health risks attributed to agricultural operations;
- ▶ concerns regarding endangered and threatened wildlife species;
- ▶ sensitive natural habitats including riparian and aquatic habitats;
- ▶ effects on wildlife movement corridors;
- ▶ concerns related to Native American tribal consultation regarding the preservation of cultural resources pursuant to Assembly Bill 52 (2014) and Senate Bill 18 (2004));
- ▶ noise generated by airports, rail, and agriculture operations;
- ▶ concerns regarding groundwater infiltration, surface water quality, and flooding;
- ▶ affordable housing, adequate workforce housing, and consistency with the County's Regional Housing Needs Assessment;
- ▶ concerns regarding land use and zoning, conformance with the Guidelines for Orderly Development, and consistency with the Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy;
- ▶ equitable mobility options for people who are economically, socially, or physically disadvantaged;
- ▶ balancing analysis of both level of service and vehicle miles traveled (VMT); and
- ▶ the need to actively promote walking, bicycling, and transit as alternatives to driving and a strategy to reduce VMT and GHG emissions.

Issues to be resolved include choosing among alternatives to the 2040 General Plan, and deciding whether and how to mitigate the significant environmental impacts of the 2040 General Plan. Additionally, if it adopts the 2040 General Plan, the Ventura County Board of Supervisors must decide whether specific social, economic, or other benefits of the 2040 General Plan outweigh its significant unavoidable environmental impacts; if so, the Board of Supervisors must adopt a Statement of Overriding Considerations.

Table 2-4 Summary of Impacts and Mitigation Measures

Impacts	Significance Before Mitigation	Mitigation Measures	Significance with Mitigation Measures
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable N/A = discussion is provided for information purposes only and is neither required by CEQA nor subject to its requirements			
Aesthetics, Scenic Resources, and Light Pollution			
Impact 4.1-1: Physically Alter a Scenic Resource that is Visible from a Public Viewing Location	LTS	No mitigation is required for this impact.	LTS
Impact 4.1-2: Substantially Obstruct, Degrade, Obscure, or Adversely Affect the Character of a Scenic Vista that is Visible from a Public Viewing Location	LTS	No mitigation is required for this impact.	LTS
Impact 4.1-3: Create a New Source of Disability Glare or Discomfort Glare for Motorists Traveling along Any Road of the County Regional Road Network	PS	Mitigation Measure AES-1: New Implementation Program COS-X: Review Discretionary Development for Glare Effects Along Regional Roadway Network Roadways The County shall include the following new implementation program in the 2040 General Plan. <u>Implementation Program COS-X: Review Discretionary Development for Glare Effects Along Regional Road Network Roadways</u> <u>Applicants for future discretionary development projects that include use of reflective surfaces such as metal, glass, or other materials that could produce glare and that the County determines would potentially be visible to motorists traveling along one or more RRN roadways shall submit a detailed site plan and list of project materials to the County for review and approval. If the County determines that the project would include materials that would produce disability or discomfort glare for motorists traveling along one or more RRN roadways then the County will either require the use of alternative materials, such as high-performance tinted non-mirrored glass, painted (non-gloss panels), and pre-cast concrete or fabricated textured wall surfaces, or require that the applicant submit a study demonstrating that the project would not introduce a glare source that exceeds 3:1 in a luminance histogram, which consists of inputting a set of digital photographs from a subject glare source into a computer simulation program and generating a graph that identifies the brightness level of different sections of that scene, from darkest to brightest. Glare impacts from future projects would be considered significant when the glare source to the median of the background ration exceeds 3:1 in a luminance histogram.</u>	LTS

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Impact 4.1-4: Create a New Source of Substantial Light or Glare Which Would Adversely Affect Day or Nighttime Views in the Area	LTS	No mitigation is required for this impact.	LTS										
Agriculture and Forestry Resources													
Impact 4.2-1: Loss of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance	PS	<p>Mitigation Measure AG-1: New Policy AG-X: Avoid Development on Agricultural Land</p> <p>The County shall include the following new policy in the 2040 General Plan.</p> <p><u>Policy AG-X: Avoid Development on Agricultural Land</u> <u>The County shall ensure that discretionary development located on land identified as Important Farmland on the State's Important Farmland Inventory shall be conditioned to avoid direct loss of Important Farmland as much as feasibly possible.</u></p> <p>Mitigation Measure AG-2: New Implementation Program AG-X: Establish an Agricultural Conservation Easement</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><u>Implementation Program AG-X: Establish an Agricultural Conservation Easement</u> <u>Applicants for discretionary projects that would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table below shall ensure the permanent protection of offsite farmland of equal quality at a 2:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement.</u></p> <table><tr><th><u>General Plan Land Use Designation</u></th><th><u>Important Farmland Inventory Classification</u></th><th><u>Acres Lost</u></th></tr><tr><td rowspan="3"><u>Agricultural</u></td><td><u>Prime/Statewide</u></td><td><u>5</u></td></tr><tr><td><u>Unique</u></td><td><u>10</u></td></tr><tr><td><u>Local</u></td><td><u>15</u></td></tr></table>	<u>General Plan Land Use Designation</u>	<u>Important Farmland Inventory Classification</u>	<u>Acres Lost</u>	<u>Agricultural</u>	<u>Prime/Statewide</u>	<u>5</u>	<u>Unique</u>	<u>10</u>	<u>Local</u>	<u>15</u>	SU
<u>General Plan Land Use Designation</u>	<u>Important Farmland Inventory Classification</u>	<u>Acres Lost</u>											
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		<table><tr><td rowspan="3"><u>Open Space/Rural</u></td><td><u>Prime/Statewide</u></td><td><u>10</u></td></tr><tr><td><u>Unique</u></td><td><u>15</u></td></tr><tr><td><u>Local</u></td><td><u>20</u></td></tr><tr><td rowspan="3"><u>All Land Use Designations</u></td><td><u>Prime/Statewide</u></td><td><u>20</u></td></tr><tr><td><u>Unique</u></td><td><u>30</u></td></tr><tr><td><u>Local</u></td><td><u>40</u></td></tr></table>	<u>Open Space/Rural</u>	<u>Prime/Statewide</u>	<u>10</u>	<u>Unique</u>	<u>15</u>	<u>Local</u>	<u>20</u>	<u>All Land Use Designations</u>	<u>Prime/Statewide</u>	<u>20</u>	<u>Unique</u>	<u>30</u>	<u>Local</u>	<u>40</u>	
<u>Open Space/Rural</u>	<u>Prime/Statewide</u>	<u>10</u>															
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	<u>Unique</u>	<u>30</u>															
	<u>Local</u>	<u>40</u>															
<p>If the Planning Division, in consultation with the Agricultural Commissioner, determines that a discretionary project would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table above, the project applicant shall prepare and submit a report for the review and approval of the Planning Division in consultation with the Agricultural Commissioner which identifies a minimum of one proposed potential mitigation site suitable for ensuring the permanent protection of offsite farmland of equal quality at a 2:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement. The contents of the report shall be determined, reviewed, and approved by the Planning Division in consultation with the Agricultural Commissioner (hereafter referred to as the "reviewing agencies"), and shall include information necessary for the reviewing agencies and a qualified entity responsible for holding the conservation easement to determine the viability of the proposed mitigation site for the establishment of a permanent agricultural conservation easement. Among the factors necessary for approval by the reviewing agencies, the proposed mitigation site shall be located in the County of Ventura unincorporated area, must not already have permanent protection, and must be equivalent to or greater than the type of Important Farmland (e.g., Unique farmland) that would be converted by the project. Among other terms that may be required by the reviewing agencies in consultation with a qualified entity, the terms of an agricultural conservation easement shall include a requirement that it run with the land. Project</p>																	

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		<u>applicants are responsible for all costs incurred by the County and the qualified entity to successfully implement this mitigation measure. Proof of the successful establishment of an agricultural conservation easement shall be provided to the Planning Division prior to issuance of a zoning clearance.</u>	
Impact 4.2-2: Result in Classified Farmland Near Any Nonagricultural Land Use or Project	LTS	No mitigation is required for this impact.	LTS
Impact 4.2-3: Conflict with Williamson Act Contracts or Agricultural Preserves	LTS	No mitigation is required for this impact.	LTS
Impact 4.2-4: Conflict with Land Zoned as Forestland, Timberland, or Timberland Production Zone	LTS	No mitigation is required for this impact.	LTS
Air Quality			
Impact 4.3-1: Conflict with or Obstruct Implementation of the 2016 Ventura County Air Quality Management Plan	LTS	No mitigation is required for this impact.	LTS
Impact 4.3-2: Cause Construction-Generated Criteria Air Pollutant or Precursor Emissions to Exceed VCAPCD-Recommended Thresholds	PS	<p>Mitigation Measure AQ-1a: New Policy HAZ-X: Construction Air Pollutant Best Management Practices</p> <p>The County shall include the following new Policy HAZ-X in the 2040 General Plan.</p> <p><u>Policy HAZ-X: Construction Air Pollutant Best Management Practices</u> <u>The County shall ensure that discretionary development will, to the extent feasible, incorporate best management practices (BMPs) to reduce emissions to be less than applicable thresholds. These BMPs include but are not limited to the most recent VCAPCD recommendations for construction BMPs (per the Air Quality Assessment Guidelines or as otherwise identified by VCAPCD).</u></p> <p>Mitigation Measure AQ-1b: New Implementation Program HAZ-X: Construction Air Pollutant Best Management Practices</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><u>Implementation Program HAZ-X: Construction Air Pollutant Best Management Practices</u></p>	SU

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		<p>Applicants for future discretionary development projects that would generate construction-related emissions that exceed applicable thresholds, will include, but are not limited to, the mitigation measures recommended by VCAPCD (in its Air Quality Assessment Guidelines or otherwise), to the extent feasible and applicable to the project. The types of measures shall include but are not limited to: maintaining equipment per manufacturer specifications; lengthening construction duration to minimize number of vehicle and equipment operating at the same time; and using electric-powered or other alternative fueled equipment in place of diesel powered equipment (whenever feasible).</p> <p>Mitigation Measure AQ-2a: New Policy HAZ-X: Fugitive Dust Best Management Practices The County shall include the following new policy in the 2040 General Plan.</p> <p><u>Policy HAZ-X: Fugitive Dust Best Management Practices</u> The County shall ensure that discretionary development which will generate fugitive dust emissions during construction activities will, to the extent feasible, incorporate BMPs that reduce emissions to be less than applicable thresholds.</p> <p>Mitigation Measure AQ-2b: New Implementation Program HAZ-X: Fugitive Dust Best Management Practices The County shall include the following new implementation program in the 2040 General Plan.</p> <p><u>Implementation Program HAZ-X: Fugitive Dust Best Management Practices.</u> Applicants for future discretionary development projects which will generate construction-related fugitive dust emissions that exceed applicable thresholds will include, but are not limited to, the types of mitigation measures recommended by VCAPCD's Air Quality Assessment Guidelines, to the extent feasible and applicable:</p> <ul style="list-style-type: none"> ▶ <u>The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excess amounts of dust.</u> 	

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		<ul style="list-style-type: none"> ▶ <u>The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excess amounts of dust.</u> ▶ <u>Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of watering (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.</u> ▶ <u>Fugitive dust produced during grading, excavation, and construction activities shall be controlled by the following activities:</u> <ul style="list-style-type: none"> ▪ <u>All trucks shall be required to cover their loads as required by California Vehicle Code Section 23114.</u> ▪ <u>All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary and reclaimed water shall be used whenever possible.</u> ▶ <u>Graded and/or excavated inactive areas of the construction site shall be monitored by (indicate by whom) at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.</u> ▶ <u>Signs shall be posted on-site limiting traffic to 15 miles per hour or less.</u> ▶ <u>During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site.</u> 	

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		<p>The site superintendent/supervisor shall use his/her discretion in conjunction with VCAPCD when winds are excessive.</p> <ul style="list-style-type: none"> ▶ Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads. ▶ Personnel involved in grading operations, including contractors and subcontractors, should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations. 	
Impact 4.3-3: Result in a Net Increase in Long-Term Operational Criteria Air Pollutant and Precursor Emissions That Exceed VCAPCD-Recommended Thresholds	PS	No feasible mitigation is available for this impact beyond the policies and implementation programs included in the 2040 General Plan. Refer to Impact 4.3-3 in Section 4.3 Air Quality for explanation.	SU
Impact 4.3-4: Result in a Short- or Long-Term Increase in Localized CO Emissions That Exceed VCAPCD-Recommended Thresholds	LTS	No mitigation is required for this impact.	LTS
Impact 4.3-5: Expose Sensitive Receptors to Substantial Increases in Toxic Air Contaminant Emissions	PS	<p>Mitigation Measure AQ-3: New Policy HAZ-10.X: Setback Requirements for Sensitive Land Uses Near Heavily Traveled Transportation Corridors</p> <p>The County shall include the following new policy in the 2040 General Plan.</p> <p><u>Policy HAZ-10.X: Setback Requirements for Sensitive Land Uses Near Heavily Traveled Transportation Corridors</u></p> <p><u>The County shall require all discretionary development to demonstrate that development of land uses with sensitive receptors (sensitive receptors are considered to be populations or uses that are more susceptible to the effects of air pollution than the general population, such as long-term health care facilities, rehabilitation centers, retirement homes, convalescent homes, residences, schools, childcare centers, and playgrounds) are located at least 500 feet from any freeway or urban road with traffic volumes that exceed 100,000 vehicles per day, or rural roads that exceed 50,000 vehicles per day. New sensitive receptors can be located with 500 feet of a new or existing freeway or urban road with traffic volumes that exceed 100,000 vehicles per day, or rural road with traffic volumes that exceed 50,000 vehicles per day only if a project applicant first prepares a qualified, site-specific health risk</u></p>	LTS

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		assessment (HRA). The HRA shall be conducted in accordance with guidance from VCAPCD and approved by VCAPCD. If the HRA determines that a nearby sensitive receptor would be exposed to an incremental increase in cancer risk greater than 10 in 1 million, then design measures shall be incorporated to reduce the level of risk exposure to less than 10 in 1 million. No further action shall be required if the HRA demonstrates that the level of cancer risk would be less than 10 in 1 million.	
Impact 4.3-6: Result in Other Emissions (Such as those Leading to Odors) Adversely Affecting a Substantial Number of People	LTS	No mitigation is required for this impact.	LTS
Biological Resources			
Impact 4.4-1: Disturb or Result in Loss of Special-Status Species and Habitat	PS	Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources The County shall include the following new implementation program in the 2040 General Plan. <u>Implementation Program COS-X: Protection of Sensitive Biological Resources</u> <u>The County shall update the Initial Study Assessment Guidelines, Biological Resources Assessment report criteria to evaluate discretionary development that could potentially impact sensitive biological resources with the following:</u> <ul style="list-style-type: none"> ▶ <u>The qualified biologist shall conduct an initial data review to determine the sensitive biological resources (i.e., special-status plant, special-status wildlife, sensitive habitats [e.g., riparian habitat, sensitive plant communities, ESHA, coastal beaches, sand dunes, other sensitive natural communities], wetlands and other non-wetland waters, native wildlife nursery sites, or wildlife corridors) that have the potential to occur within the project footprint. This will include but not be limited to review of the best available, current data including vegetation mapping data, mapping data from the County and California Coastal Commission, and database searches of the CNDDDB and the CNPS Inventory of Rare and Endangered Plants of California.</u> ▶ <u>The qualified biologist shall conduct a reconnaissance-level survey for sensitive biological resources within the project footprint (including proposed access roads, proposed staging areas, and the immediate</u> 	SU

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		<p>vicinity surrounding the project footprint) to determine whether sensitive biological resources identified during the initial data review have potential to occur.</p> <ul style="list-style-type: none"> ▶ If the reconnaissance-level survey identifies no potential for sensitive biological resources to occur, the applicant will not be subject to additional mitigation measures. ▶ If sensitive biological resources are observed or determined to have potential to occur within or adjacent to the project footprint during the reconnaissance-level survey, then the following measures shall apply: <p>Special-Status Species:</p> <ul style="list-style-type: none"> ▪ If special-status species are observed or determined to have potential to occur within or adjacent to the project footprint, a qualified biologist shall conduct focused or protocol-level surveys for these species where established, current protocols are available (e.g., Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities [CDFW 2018], Staff Report on Burrowing Owl Mitigation [CDFG 2012]). If an established protocol is not available for a special-status species, then the qualified biologist will consult with the County, and CDFW or USFWS, to determine the appropriate survey protocol. ▪ If special-status species are identified during protocol-level surveys, then the County shall require implementation of mitigation measures that fully account for the adversely affected resource. When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts. ▪ If impacts on special-status species are unavoidable, then the project proponent shall obtain incidental take authorization from USFWS or CDFW (e.g., for species listed under ESA or CESA) prior to commencing development of the project site, apply minimization measures or other conditions required under incidental take authorization, and shall compensate for impacts to special-status species by acquiring or protecting land that provides habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of project implementation; generally at least a 1:1 ratio. Compensation may 	

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		<p>include purchasing credits from a USFWS- or CDFW-approved mitigation bank or restoring or enhancing habitat within the project site or outside of the project site.</p> <p><u>Sensitive Habitats, Wetlands, Other Non-wetland Waters, Native Wildlife Nursery Sites, and Wildlife Corridors</u></p> <ul style="list-style-type: none"> If sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors are identified within or adjacent to the project footprint, these features shall be avoided, if feasible, by implementing no-disturbance buffers around sensitive habitats, wetlands, other non-wetland waters, or native wildlife nursery sites, and avoiding development within wildlife corridors or implementing project-specific design features (e.g., wildlife-friendly fencing and lighting) within wildlife corridors, such that direct and indirect adverse effects of project development are avoided. A delineation of aquatic habitat within a project site (including waters of the United States and other waters including those under State jurisdiction) including identification of hydrology, hydric soils, and hydrophytic vegetation, by a qualified biologist may be required to identify the exact extent of wetlands or other water features identified within or adjacent to the project footprint. If impacts to sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors cannot be avoided, then the project proponent shall obtain required regulatory authorization (e.g., Section 404 permits for impacts to waters of the United States, 401 water quality certification from the Regional Water Quality Control Board, a Streambed Alteration Agreement for impacts to aquatic or riparian habitats within CDFW jurisdiction under Fish and Game Code Section 1602, a coastal development permit for impacts to ESHA), and shall compensate for unavoidable losses of these resources. Compensation may include restoration of sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors within or outside of the project site, preserving the aforementioned resources through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function, or purchasing credits at an existing authorized 	

Table 2-4 Summary of Impacts and Mitigation Measures

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		mitigation bank or in lieu fee program. The County shall require restoration or compensation for loss of sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors at a minimum of a 1:1 ratio or "no-net-loss."	
Impact 4.4-2: Disturb or Result in Loss of Riparian Habitat, Sensitive Plant Communities, ESHA, Coastal Beaches, Sand Dunes, and Other Sensitive Natural Communities	PS	Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources	SU
Impact 4.4-3: Disturb or Result in Loss of Wetlands and other Waters	PS	Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources	SU
Impact 4.4-4: Interfere with Resident or Migratory Wildlife Corridors or Native Wildlife Nursery Sites	PS	Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources	SU
Impact 4.4-5: Conflict with Any Local Policies or Ordinances Protecting Biological Resources	LTS	No mitigation is required for this impact.	LTS
Cultural, Tribal Cultural, and Paleontological Resources			
Impact 4.5-1: Substantial Adverse Change in the Significance of an Archaeological Resource Pursuant to PRC 5024.1 and CEQA	PS	<p>Mitigation Measure CUL-1a: Revised Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation</p> <p>The County shall include the following revised policy in the 2040 General Plan.</p> <p>Policy COS-4.4: Discretionary Development and Tribal, Cultural, Historical, Paleontological, and Archaeological Resource Preservation</p> <p>The County shall require <u>that all</u> discretionary development <u>projects</u> be assessed for potential <u>tribal, cultural, historical, paleontological, and archaeological resources</u> by a qualified professional <u>and shall</u> be designed to <u>protect existing resources, and shall avoid potential impacts to these resources whenever</u> to the maximum extent feasible. <u>Whenever possible, significant impacts shall be reduced to a less-than-significant level through the application of feasible mitigation and/or shall be mitigated by extracting extraction of</u> maximum recoverable data.</p> <p>Mitigation Measure CUL-1b: New Implementation Program COS-X: Cultural Records Research</p>	SU

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		<p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><u>Implementation Program COS-X: Cultural Records Research</u> <u>As part of a discretionary application process, project applicants (Ventura County for County projects) shall initiate a records search and Sacred Lands File search with the South Central Coastal Information Center.</u></p> <p>Mitigation Measure CUL-1c: New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures The County shall include the following new implementation program in the 2040 General Plan.</p> <p><u>Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures.</u> <u>For discretionary projects, the County shall require the following:</u></p> <ul style="list-style-type: none"> ▶ <u>Projects shall be designed to protect existing resources and shall avoid potential impacts to the maximum extent feasible.</u> ▶ <u>If determined necessary by the County, an archaeological, paleontological, and/or Native American monitor shall be retained to monitor ground-disturbing activities during construction.</u> ▶ <u>If any materials or artifacts are discovered during ground disturbance and/or construction activities, construction shall halt until a qualified archaeologist, paleontologist, or Native American monitor can access the discovery. A report or memorandum shall be prepared by the qualified monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources. Recommendations or mitigation identified by the qualified monitor shall be implemented prior to commencing or continuing project activities and/or construction.</u> 	
Impact 4.5-2: Substantial Adverse Change in the Significance of a Historic Resource Pursuant to PRC 5024.1 and CEQA	PS	<p>Mitigation Measure CUL-1a: Revised Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation</p> <p>Mitigation Measure CUL-1b: New Implementation Program COS-X: Cultural Records Research</p>	SU

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NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable N/A = discussion is provided for information purposes only and is neither required by CEQA nor subject to its requirements			
		<p>Mitigation Measure CUL-1c: New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures</p> <p>Mitigation Measure CUL-2: Revised Policy COS-4.7: Cultural Heritage Board Review</p> <p>The County shall include the following revised policy in the 2040 General Plan.</p> <p>Policy COS-4.7: Cultural Heritage Board Review</p> <p>Prior to environmental review of discretionary development projects, the County shall initiate a records search request with the South Central Coastal Information Center and coordinate with the Cultural Heritage Board to identify sites of potential archaeological, historical, tribal cultural and paleontological significance, to ensure that all known resources have been properly identified. Should a site of archaeological, tribal, architectural, or historical significance be identified, the County shall provide an opportunity for the Cultural Heritage Board to include recommendations specific to the discretionary project and identified resource(s). If it is determined during the review that determine whether a site has potential archaeological, tribal, architectural, or historical significance, and provide this information shall be provided to the County Cultural Heritage Board for evaluation. and recommendation Recommendations identified by the Cultural Heritage Board shall be provided to the appropriate decision-making body.</p> <p>Mitigation Measure CUL-3: New Implementation Program COS-X: Project-Level Historic Surveys and Protection of Historic Resources</p> <p>The County shall include the following new Implementation Program COS-X in the 2040 General Plan.</p> <p>Implementation Program COS-X: Project-Level Historic Surveys and Protection of Historic Resources</p> <p>During project-specific environmental review of discretionary development, the County shall define the project's area of potential effect for historic buildings and structures. The County shall determine the potential for the project to result in historic resource impacts, based on the extent of ground</p>	

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		<p>disturbance and site modification anticipated for the project. The potential for adverse impacts to historic resources shall also be determined pursuant to the requirements and protocol set forth in the Ventura County ISAG and Cultural Heritage Board Ordinance.</p> <p>Before altering or otherwise affecting a building or structure 50 years old or older, the project-applicant shall retain a qualified architectural historian according to the Secretary of the Interior Standards, to record it on a California Department of Parks and Recreation DPR 523 form or equivalent documentation, if the building has not previously been evaluated. Its significance shall be assessed by a qualified architectural historian, using the significance criteria set forth for historic resources under CEQA Guidelines Section 15064.5. The evaluation process shall include the development of appropriate historical background research as context for the assessment of the significance of the structure in the county and the region. For buildings or structures that do not meet PRC 5024.1 or the CEQA criteria for historical resource, no further mitigation is required.</p> <ol style="list-style-type: none"> 1) If the building or structure can be preserved on site, but remodeling, renovation or other alterations are required, this work shall be conducted in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. 2) If a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, the County shall ensure that a qualified architectural historian thoroughly documents the building and associated landscape and setting. Documentation shall include still and video photography and a written documentary record/history of the building to the standards of the Historic American Building Survey or Historic American Engineering Record, including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. The record shall be prepared in consultation with State Historic Preservation Officer and filed with the Office of Historic Preservation. The record shall be accompanied by a report containing site-specific history and 	

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		<p><u>appropriate contextual information. This information shall be gathered through site specific and comparative archival research, and oral history collection as appropriate.</u></p> <p>3) <u>If preservation and reuse at the site are not feasible, the historical building shall be documented as described in item (2) and, when physically and financially feasible, be moved and preserved or reused.</u></p> <p>4) <u>If, in the opinion of the qualified architectural historian, the nature and significance of the building is such that its demolition or destruction cannot be fully mitigated through documentation, the County shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications to the proposed project that would allow the structure to be preserved intact. These could include project redesign, relocation or abandonment. If no such measures are feasible, the historical building shall be documented as described in item (2).</u></p>	
Impact 4.5-3: Substantial Adverse Change in the Significance of a Tribal Cultural Resources	PS	<p>Mitigation Measure CUL-1a: Revised Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation</p> <p>Mitigation Measure CUL-1b: New Implementation Program COS-X: Cultural Records Research</p> <p>Mitigation Measure CUL-1c: New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures</p> <p>Mitigation Measure CUL-2: Revised Policy COS-4.7: Cultural Heritage Board Review</p> <p>Mitigation Measure CUL-4: Revised Policy COS-4.1: Cultural, Historical, Paleontological, and Archaeological Resources Inventory</p> <p>The County shall include the following revised policy in the 2040 General Plan.</p> <p>Policy COS-4.1: <u>Tribal</u>, Cultural, Historical, Paleontological, and Archaeological Resources Inventory</p>	SU

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		<p>The County shall maintain an inventory of <u>tribal</u>, cultural, historical, paleontological, and archaeological resources in Ventura County based on project studies and secondary resources, <u>including record studies and reports filed with natural history programs, the California Historical Resources Information System and the Native American Heritage Commission.</u></p> <p>Mitigation Measure CUL-5: Revised Policy COS-4.2: Cooperation for Cultural, Historical, Paleontological, and Archaeological Resource Preservation</p> <p>The County shall include the following revised policy in the 2040 General Plan.</p> <p>Policy COS-4.2: Cooperation for <u>Tribal</u> Cultural, Historical, Paleontological, and Archaeological Resource Preservation</p> <p>The County shall cooperate with cities, special districts, other appropriate organizations, <u>including the Native American Heritage Commission</u>, and private landowners to identify <u>known tribal cultural, archaeological, historical, and paleontological resources.</u> If necessary, the County shall <u>engage in consultation with local tribes and preservation groups, to and preserve the county's tribal cultural, historical, paleontological, and archaeological identified resources within the county.</u></p>	
Impact 4.5-4: Result in Grading and Excavation of Fossiliferous Rock or Increase Access Opportunities and Unauthorized Collection of Fossil Materials from Valuable Sites	PS	<p>Mitigation Measure CUL-1a: Revised Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation</p> <p>Mitigation Measure CUL-1b: New Implementation Program COS-X: Cultural Records Research</p> <p>Mitigation Measure CUL-1c: New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures</p> <p>Mitigation Measure CUL-4: Revised Policy COS-4.1: Cultural, Historical, Paleontological, and Archaeological Resources Inventory</p>	SU

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		Mitigation Measure CUL-5: Revised Policy COS-4.2: Cooperation for Cultural, Historical, Paleontological, and Archaeological Resource Preservation Mitigation Measure CUL-6: New Implementation Program COS-X: Implement Project-Level Security Measures The County shall include the following new implementation program in the 2040 General Plan. <u>Implementation Program COS-X: Implement Project-Level Security Measures</u> During project-level ground disturbance activities for discretionary development, in areas where paleontologically rich sites are known to be present, project sites shall be secured during non-construction hours to ensure that the unauthorized access and the unlawful curation of fossil materials does not occur. Such security measures may include construction fencing, unauthorized access signage, security lighting, and security cameras. For large-scale development, a security plan may be prepared prior to construction activities to detail security measures and protocol for the project site.	
Energy			
Impact 4.6-1: 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	LTS	No mitigation is required for this impact.	LTS
Geologic Hazards			
Impact 4.7-1: Result in Development within a State of California–Earthquake Fault Zone designated by the Alquist-Priolo Earthquake Fault Zoning Act or a County–Designated Fault Hazard Area that Exposes People or Structures to Fault Rupture Hazards or Directly or Indirectly Causes Fault Rupture	LTS	No mitigation is required for this impact.	LTS
Impact 4.7-2: Have Potential to Expose People or Structures to the Risk of Loss, Injury, or Death involving Ground-Shaking Hazards	N/A	No mitigation is required for this impact.	N/A

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Impact 4.7-3: Result In Development Within a State of California Seismic Hazards Zone that Exposes People or Structures to Liquefaction Hazards or Directly or Indirectly Cause the Risk of Loss, Injury, or Death Involving Liquefaction	LTS	No mitigation is required for this impact.	LTS
Impact 4.7-4: Result in Development that Exposes People or Structures to Landslide or Debris flow Hazards as a Result of Mapped Landslides, Potential Earthquake-Induced Landslide Zones, and Geomorphology of Hillside Terrain or Directly or Indirectly Cause Landslides	LTS	No mitigation is required for this impact.	LTS
Impact 4.7-5: Result in Development that Exposes People or Structures to the Risk of Loss, Injury, or Death Involving Soil Expansion or Directly or Indirectly Cause Soil Expansion If Development Is Located within an Expansive Soils Hazard Zone or Where Soils with an Expansion Index Greater Than 20 is Present	LTS	No mitigation is required for this impact.	LTS
Impact 4.7-6: Result in Development that Expose People or Structures to the Risk of Loss, Injury, or Death Involving Subsidence or Directly or Indirectly Cause Subsidence If Development Is Located within a Subsidence Hazard Zone	LTS	No mitigation is required for this impact.	LTS
Greenhouse Gas Emissions			
Impact 4.8-1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment	PS	Mitigation Measure GHG-1: New Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development The County shall include the following new implementation program in the 2040 General Plan. <u>Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development</u> To support the proposed reach codes under COS-S, the 2040 General Plan shall include a new program in the Hazards and Safety element that prohibits the installation of new natural gas infrastructure in new residential construction through amendments to the Ventura County Building Code. This program shall also be extended to include commercial building types such as offices, retail buildings, and hotels where the use of natural gas is	SU

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		<p>not critical to business operations and contain appliances that can be feasibility substituted with electricity powered equivalents.</p> <p>Mitigation Measure GHG-2: New Implementation Program HAZ-X: Building Energy Saving Ordinance for Industrial Buildings</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><u>Implementation Program X: Building Energy Saving Ordinance for Industrial Buildings</u></p> <p><u>To address GHG emissions associated with electricity consumption by industrial buildings, which were not quantified in the GHG Inventory and Forecasting due to utility privacy rules, the County shall implement a program to adopt a Building Energy Saving Ordinance for industrial buildings over 25,000 square feet in size, modeled after the local benchmarking ordinances adopted in other local jurisdictions in California (CEC 2019). The County shall prepare reports showing the energy performance of industrial buildings relative to similar buildings in California and the United States and make these reports available to the public by request. The County, through their building department shall provide recommendations on energy efficiency retrofits and green building strategies to improve energy performance to property owners and tenants subject to the reporting requirements.</u></p> <p>Mitigation Measure GHG-3: Do Not Include Implementation Program COS-EE in the 2040 General Plan</p> <p>The County shall not include Implementation Program COS-EE in the 2040 General Plan.</p> <p><u>Implementation Program COS-EE: Streamlining GHG Analysis for Projects Consistent with the General Plan.</u> Projects subject to environmental review under CEQA may be eligible for tiering and streamlining the analysis of GHG emissions, pursuant to CEQA Guidelines Section 15183.5, provided they incorporate applicable GHG reduction measures included in the GHG Strategy contained in the General Plan and</p>	

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		<p>Program EIR. The County shall review such projects to determine whether the following criteria are met:</p> <ul style="list-style-type: none"> ▶ Proposed project is consistent with the current General Plan land use designation and applicable zoning designations for the project site; ▶ Proposed project incorporates all applicable GHG reduction measures (as documented in Appendix B to the General Plan and analyzed in the GHG Section of the Program EIR) into project design and/or as binding and enforceable mitigation measures in the project-specific CEQA document prepared for the project; and, ▶ Proposed project clearly demonstrates the method, timing and process for which the project will comply with applicable GHG reduction measures and/or conditions of approval. <p>The County may develop more specific tiering and streamlining tools or procedures, such as a consistency review checklist, or more detailed guidance for determining consistency with the GHG Strategy.</p> <p>Similarly, the County may incorporate appropriate elements of such guidance and procedures into the County's Initial Study Assessment Guidelines (ISAGs).</p> <p>Mitigation Measure GHG-4: New Implementation Program HAZ-X: Greenhouse Gas Reduction Policy Enhancement Program</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><u>Implementation Program HAZ-X: Greenhouse Gas Reduction Policy Enhancement Program</u></p> <p><u>The Climate Emergency Council that would be established under COS-CC shall develop recommended subprograms which implement the 52 policies identified in Table 4.8-8 that do not have associated implementation programs in the 2040 General Plan. Any recommendations that would require amendments to the General Plan, including any subprograms that may include expansions to programs already proposed in the 2040 General Plan, shall be provided to the County Planning Director. The Planning Director shall include the recommendation in a report for consideration by the Planning Commission and Board of Supervisors.</u></p>	

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		Mitigation Measure CTM-1: New Implementation Program CTM-X: Interim VMT CEQA Assessment Criteria Mitigation Measure CTM-2: Revised Implementation Program CTM-B: Initial Study Assessment Guidelines Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program	
Impact 4.8-2: Conflict with an Applicable Plan, Policy, or Regulation for the Purpose of Reducing the Emissions of GHGs	PS	Mitigation Measure GHG-1: New Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development Mitigation Measure GHG-2: New Implementation Program HAZ-X: Building Energy Saving Ordinance for Industrial Buildings Mitigation Measure GHG-3: Do Not Include Implementation Program COS-EE in the 2040 General Plan Mitigation Measure GHG-4: New Implementation Program HAZ-X: Greenhouse Gas Reduction Policy Enhancement Program Mitigation Measure CTM-1: New Implementation Program CTM-X: Interim VMT CEQA Assessment Criteria Mitigation Measure CTM-2: Revised Implementation Program CTM-B: Initial Study Assessment Guidelines Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program	SU
Hazards, Hazardous Materials, and Wildfire			
Impact 4.9-1: Create a Significant Hazard to the Public or the Environment Through the Routine Transport, Use, or Disposal of Hazardous Materials or Hazardous Waste	LTS	No mitigation is required for this impact.	LTS
Impact 4.9-2: Create a Significant Hazard to the Public or the Environment Through the Reasonably Foreseeable Upset and Accident Conditions Involving the Release of Hazardous Materials or Hazardous Waste into the Environment	LTS	No mitigation is required for this impact.	LTS

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Impact 4.9-3: Emit Hazardous Emissions or Handle Hazardous Materials Within One-Quarter Mile of an Existing or Proposed School	LTS	No mitigation is required for this impact.	LTS
Impact 4.9-4: Create a Significant Hazard Due to Location on a Site Which is Included on a List of Hazardous Materials Sites	LTS	No mitigation is required for this impact.	LTS
Impact 4.9-5: Locate Inconsistent Land Uses Within the Sphere of Influence of Any Airport, or Otherwise Result in a Safety Hazard to People Residing or Working Near an Airport	LTS	No mitigation is required for this impact.	LTS
Impact 4.9-6: Expose People to Risk of Wildfire by Locating Development in a High Fire Hazard Area/Fire Hazard Severity Zone or Substantially Impairing an Adopted Emergency Response Plan or Evacuation Plan or Exacerbate Wildfire Risk	PS	No additional feasible mitigation is available for this impact beyond the policies and implementation programs of the 2040 General Plan. Refer to Impact 4.9-6 in Section 4.9 Hazards, Hazardous Materials, and Wildfire for explanation.	SU
Hydrology and Water Quality			
Impact 4.10-1: Directly or Indirectly Decrease the Net Quantity of Groundwater in a Groundwater Basin That Is Overdrafted or Create an Overdrafted Groundwater Basin	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-2: Result in Net Groundwater Extraction That Causes Overdrafted Basins in Groundwater Basins That Are Not Overdrafted or Are Not in Hydrologic Continuity with an Overdrafted Basin	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-3: Result in Any Increase in Groundwater Extraction in Areas Where the Groundwater Basin and/or Hydrologic Unit Condition Is Not Well Known or Documented and There Is Evidence of Overdraft Based upon Declining Water Levels in a Well or Wells	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-4: Degrade the Quality of Groundwater and Cause Groundwater to Exceed Groundwater Quality Objectives Set by the Applicable Basin Plan	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-5: Result in the Use of Groundwater, in Any Capacity, and Would Be Located within 2 Miles of the Boundary of a Former or Current Test Site for Rocket Engines	LTS	No mitigation is required for this impact.	LTS

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Impact 4.10-6: Increase Surface Water Consumptive Use (Demand) in a Fully Appropriated Stream Reach, as Designated by SWRCB, or Where Unappropriated Surface Water Is Unavailable	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-7: Increase Surface Water Consumptive Use (Demand) Including Diversion or Dewatering Downstream Reaches, Resulting in an Adverse Impact on One or More of the Beneficial Uses Listed in the Applicable Basin Plan	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-8: Degrade the Quality of Surface Water, Causing It to Exceed the Water Quality Objectives Contained in the Applicable Basin Plan	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-9: Cause Stormwater Quality to Exceed Water Quality Objectives or Standards in the Applicable MS4 Permit or Any Other NPDES Permits	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-10: Be Located within 10 to 20 Feet of Vertical Elevation from an Enclosed Body of Water Such as a Lake or Reservoir, Resulting in a Seiche Hazard	N/A	No mitigation is required for this impact.	N/A
Impact 4.10-11: Be Located within about 10–20 Feet of Vertical Elevation from an Enclosed Body of Water Such as a Lake or Reservoir, Resulting in a Seiche Hazard	N/A	No mitigation is required for this impact.	N/A
Impact 4.10-12: Result in Erosion, Siltation, or Flooding Hazards	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-13: Be Located in a Mapped Area of Flood Hazards	N/A	No mitigation is required for this impact.	N/A
Impact 4.10-14: Impact Flood Control Facilities and Watercourses by Obstructing, Impairing, Diverting, Impeding, or Altering the Characteristics of the Flow of Water, Resulting in Exposing Adjacent Property and the Community to Increased Risk of Flood Hazards	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-15: Result in Conflicts With the Ventura County Watershed Protection District's Comprehensive Plan Through Potential Deposition of Sediment and Debris Materials within Existing Channels and Allied Obstruction of Flow; Overflow of Channels during Design Storm	LTS	No mitigation is required for this impact.	LTS

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Conditions; and Increased Runoff and the Effects on Areas of Special Flood Hazard and Regulatory Channels Both On- and Off-Site, for Projects Not Located within the Ventura County Watershed Protection District's Comprehensive Plan			
Impact 4.10-16: Result in Noncompliance with Building Design and Construction Standards Regulating Flow to and from Natural and Man-Made Drainage Channels	LTS	No mitigation is required for this impact.	LTS
Impact 4.10-17: Be Designed to Meet All Applicable Requirements for Onsite Wastewater Treatment Systems	LTS	No mitigation is required for this impact.	LTS
Land Use and Planning			
Impact 4.11-1: Result in Physical Development That Is Incompatible With Land Uses, Architectural Form Or Style, Site Design/Layout, Or Density/Parcel Sizes Within Existing Communities	LTS	No mitigation is required for this impact.	LTS
Impact 4.11-2: Result in Physical Development That Would Divide An Established Community	LTS	No mitigation is required for this impact.	LTS
Impact 4.11-3: Cause an Environmental Impact Due To A Conflict With A Regional Plan, Policy, or Program	LTS	No mitigation is required for this impact.	LTS
Mineral and Petroleum Resources			
Impact 4.12-1: Result in Development on or Adjacent to Existing Mineral Resources Extraction Sites or Areas Where Mineral Resources Are Zoned, Mapped, or Permitted for Extraction, Which Could Hamper or Preclude Extraction of the Resources	LTS	No mitigation is required for this impact.	LTS
Impact 4.12-2: 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	LTS	No mitigation is required for this impact.	LTS
Impact 4.12-3: Result in Development on or Adjacent to Existing Petroleum Resources Extraction Sites or Areas Where Petroleum Resources Are Zoned, Mapped, or Permitted for Extraction, Which Could Hamper or Preclude Access to the Resources	PS	Mitigation Measure PR-1: Revised Policy COS-7.2: Oil Well Distance Criteria The County shall include the following revised policy in the 2040 General Plan.	SU

Table 2-4 Summary of Impacts and Mitigation Measures

Impacts	Significance Before Mitigation	Mitigation Measures	Significance with Mitigation Measures
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable N/A = discussion is provided for information purposes only and is neither required by CEQA nor subject to its requirements			
		Policy COS-7.2: Oil Well Distance Criteria. The County shall require that new discretionary oil and gas wells to be located be sited a minimum of 1,500 feet from the well head to residential dwellings dwelling units and 2,500 from any school <u>sensitive use structures which include dwellings, childcare facilities, hospitals, health clinics, and school property lines.</u>	
Impact 4.12-4: Result in the Loss of Availability of a Known Petroleum Resource That Would Be of Value to the Region and the Residents of the State	PS	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 <u>crude oil and produced water, if feasible; oil and produced water shall not be trucked.</u> 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. <u>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.</u> 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. 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, <u>if feasible.</u> Flaring or venting shall may only be allowed if the proponent demonstrates that conducting operations without flaring or venting is infeasible. <u>In addition, flaring or venting is allowed in cases of emergency and for testing purposes, consistent with federal State, and local regulations.</u>	LTS
Noise and Vibration			
Impact 4.13-1: Expose Sensitive Receptors to Construction Noise Levels That Exceed Applicable Standards	LTS	No mitigation is required for this impact.	LTS
Impact 4.13-2: Expose New Sensitive Land Uses to Traffic Noise	LTS	No mitigation is required for this impact.	LTS

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Impact 4.13-3: Expose Existing Sensitive Receptors to Traffic-Noise Increases	PS	Mitigation Measure NOI-1: New Policy HAZ-X Implement Noise Control Measures for Traffic Noise The County shall include the following new policy in the 2040 General Plan. <u>Policy HAZ-X: Implement Noise Control Measures for Traffic Noise</u> <u>The County shall require noise control measures to be implemented along roadways for new discretionary development generating traffic noise if either of the following circumstances would exist:</u> <ul style="list-style-type: none"> ▶ <u>The discretionary development would result in traffic noise levels above a County noise compatibility standard stated in Policy HAZ 9.2 in an area where traffic noise levels, under existing conditions, do not exceed the County noise compatibility standard; or,</u> ▶ <u>The discretionary development would result in an increase in traffic noise levels of 3 dBA or greater in an area where traffic noise levels under existing conditions exceed a County noise compatibility standard stated in Policy HAZ 9.2.</u> <u>Noise control measures may include increased vegetation, roadway pavement improvements and maintenance, and site and building design features. If such measures are not sufficient to reduce a new discretionary development's fairshare of traffic-generated noise at sensitive receptors, a sound wall barrier may be constructed. All feasible noise reduction measures shall be implemented to ensure the development's fairshare of traffic-generated noise is reduced, consistent with Policy HAZ 9.2.</u>	SU
Impact 4.13-4: Expose Noise-Sensitive Land Uses to Operational Stationary Noise That Exceeds Applicable Standards	LTS	No mitigation is required for this impact.	LTS
Impact 4.13-5: Expose Noise-Sensitive Land Uses to Airport Noise That Exceeds the Standards in the Ventura County Airport Comprehensive Land Use Plan	N/A	No mitigation is required for this impact.	N/A
Impact 4.13-6: Expose Sensitive Receptors to Construction Vibration Levels That Exceed Applicable Standards	PS	Mitigation Measure NOI-2: Revised Policy HAZ-9.2: Noise Compatibility Standards The County shall include the following revised policy in the 2040 General Plan. Policy HAZ-9.2: Noise Compatibility Standards	SU

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		<p>The County shall review discretionary development for noise compatibility with surrounding uses. The County shall determine noise based on the following standards:</p> <ol style="list-style-type: none"> 1. New noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed CNEL 60 or $L_{eq}1H$ of 65 dB(A) during any hour. 2. New noise sensitive uses proposed to be located near railroads shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed L_{10} of 60 dB(A) 3. New noise sensitive uses proposed to be located near airports: <ol style="list-style-type: none"> a. Shall be prohibited if they are in a Community Noise Equivalent Level (CNEL) 65 <u>dB</u> or greater, noise contour; or b. Shall be permitted in the Community Noise Equivalent Level (CNEL) 60 <u>dB</u> to CNEL 65 <u>dB</u> noise contour area only if means will be taken to ensure interior noise levels of CNEL 45 <u>dB</u> or less. 4. New noise generators, proposed to be located near any noise sensitive use, shall incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor, measured at the exterior wall of the building, does not exceed any of the following standards: <ol style="list-style-type: none"> a. $L_{eq}1H$ of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.; b. $L_{eq}1H$ of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.; and c. $L_{eq}1H$ of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m. 5. Construction noise <u>and vibration</u> shall be evaluated and, if necessary, mitigated in accordance with the Construction Noise Threshold Criteria 	

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		<p>and Control Measures Plan (Advanced Engineering Acoustics, November 2005).</p> <p>Mitigation Measure NOI-3: New Implementation Program HAZ-X: Revise the Construction Noise Threshold Criteria and Control Plan</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><u>Implementation Program HAZ-X: Revise the Construction Noise Threshold Criteria and Control Plan</u></p> <p><u>The County shall revise the Construction Noise Threshold Criteria and Control Plan to consider all potential vibration-inducing activities and include various measures, setback distances, precautions, monitoring programs, and alternative methods to traditional construction activities with the potential to result in structural damage or excessive groundborne noise. Items that shall be addressed in the plan include, but are not limited to, the following:</u></p> <ul style="list-style-type: none"> ▶ <u>Ground vibration-producing activities, such as pile driving and blasting, shall be limited to the daytime hours between 7:00 a.m. to 7:00 p.m. on weekdays or 9:00 a.m. to 7:00 p.m. on weekends and holidays.</u> ▶ <u>If pile driving is used, pile holes shall be predrilled to the maximum feasible depth to reduce the number of blows required to seat a pile.</u> ▶ <u>All construction equipment on construction sites shall be operated as far away from vibration-sensitive sites as reasonably possible.</u> ▶ <u>Earthmoving, blasting and ground-impacting operations shall be phased so as not to occur simultaneously in areas close to sensitive receptors, to the extent feasible. The total vibration level produced could be significantly less when each vibration source is operated at separate times.</u> ▶ <u>Minimum setback requirements for different types of ground vibration-producing activities (e.g., pile driving and blasting) for the purpose of preventing damage to nearby structures shall be established. Factors to be considered include the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the fragility/resiliency of the nearby structures. Established</u> 	

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		<p>setback requirements (i.e., 100 feet) can be breached if a project-specific, site specific analysis is conducted by a qualified geotechnical engineer or ground vibration specialist that indicates that no structural damage would occur at nearby buildings or structures.</p> <ul style="list-style-type: none"> ▶ <u>Minimum setback requirements for different types of ground vibration producing activities (e.g., pile driving and blasting) for the purpose of preventing negative human response shall be established based on the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the type of sensitive receptor. Established setback requirements (i.e., 300 feet) can be breached only if a project-specific, site-specific, technically adequate ground vibration study indicates that the buildings would not be exposed to ground vibration levels in excess of 80 VdB, and ground vibration measurements performed during the construction activity confirm that the buildings are not being exposed to levels in excess of 80 VdB.</u> ▶ <u>All vibration-inducing activity within the distance parameters described above shall be monitored and documented for ground vibration noise and vibration noise levels at the nearest sensitive land use and associated recorded data submitted to Ventura County so as not to exceed the recommended FTA levels.</u> ▶ <u>Alternatives to traditional pile driving (e.g., sonic pile driving, jetting, cast-in-place or auger cast piles, nondisplacement piles, pile cushioning, torque or hydraulic piles) shall be considered and implemented where feasible to reduce vibration levels.</u> 	
Impact 4.13-7: Expose Noise-Sensitive Land Uses to Railroad Noise and Vibration that Exceeds Applicable Standards	N/A	No mitigation is required for this impact.	N/A
Population and Housing			
Impact 4.14-1: Eliminate Three or More Existing Affordable Housing Units or Displace Substantial Numbers of People or Housing Units	LTS	No mitigation is required for this impact.	LTS
Impact 4.14-2: Induce Substantial Unplanned Population Growth	LTS	No mitigation is required for this impact.	LTS

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Impact 4.14-3: Result in Low-Income Employment Opportunities that could Generate Demand for New Housing that Exceeds the County's Inventory of Land to Develop Low-Income Housing	LTS	No mitigation is required for this impact.	LTS
Public Services and Recreation			
Impact 4.15-1: Increase Demand for Law Enforcement and Emergency Services as a Result of Inadequate Security Measures	PS	Mitigation Measure PS-1: New Implementation Program PFS-X: Review Future Projects for Incorporation of Law Enforcement Security Measures and Emergency Services Access Need The County shall include the following new implementation program in the 2040 General Plan: <u>Implementation Program PFS-X: Review Future Projects for Incorporation of Law Enforcement Security Measures</u> Future discretionary projects shall be reviewed by the County Sheriff's Department to determine whether the project includes adequate security measures and access so as not to exacerbate the need for new law enforcement/emergency services. Security measures considered adequate include but are not limited to: nighttime security lighting, cameras, alarms, fencing, window and door locks, private security patrols or special event security assistance, treatment of vulnerable surfaces with anti-graffiti coating or landscaping, removal of graffiti within a specified time period and/or other design measure to create defensible space.	LTS
Impact 4.15-2: Require Expansion or Construction of New Facilities to Support Law Enforcement and Emergency Services	PS	No additional feasible mitigation is available for this impact beyond the mitigation measures identified throughout the draft EIR. Refer to Impact 4.15-2 in Section 4.15 Public Services and Recreation for explanation.	SU
Impact 4.15-3: Require Expansion or Construction of New Fire Protection Facilities and Services as a Result of Excessive Response Times, Project Magnitude, or Distance from Existing Facilities	PS	No additional feasible mitigation is available for this impact beyond the mitigation measures identified throughout the draft EIR. Refer to Impact 4.15-3 in Section 4.15 Public Services and Recreation for explanation.	SU
Impact 4.15-4: Require Expansion or Construction of New Public Libraries or Other Facilities to Meet New Demand or Address Overcrowding and Accessibility	PS	No additional feasible mitigation is available for this impact beyond the mitigation measures identified throughout the draft EIR. Refer to Impact 4.15-4 in Section 4.15 Public Services and Recreation for explanation.	SU

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Impact 4.15-5: Require Expansion or Construction of New Parks and Recreation Facilities and Services or Cause Substantial Physical Deterioration of Parks and Recreation Facilities Because of Overuse	PS	No additional feasible mitigation is available for this impact beyond the mitigation measures identified throughout the draft EIR. Refer to Impact 4.15-5 in Section 4.15 Public Services and Recreation for explanation.	SU																																																
Transportation and Traffic																																																			
Impact 4.16-1: Exceed VMT Thresholds	PS	<p>Mitigation Measure CTM-1: New Implementation Program CTM-X: Interim VMT CEQA Assessment Criteria</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><u>Implementation Program CTM-X: Interim VMT CEQA Assessment Criteria</u> Following June 30, 2020 and prior to completion of Implementation Program CTM-B, all projects (not otherwise exempt from CEQA analysis) shall be evaluated for potential environmental impacts relative to VMT using the State's minimum reduction standards, as follows:</p> <table><tr><th><u>Project Type</u></th><th><u>Measurement Unit</u></th><th><u>Model Trip Types</u></th><th><u>Minimum Criteria</u></th><th><u>Baseline VMT</u></th><th><u>Threshold VMT</u></th></tr><tr><td><u>Residential</u></td><td><u>VMT/Capita</u></td><td><u>Average of all Home Based Trip Types</u></td><td><u>15% Reduction of Regional Average</u></td><td><u>9.66</u></td><td><u>8.21</u></td></tr><tr><td><u>Office</u></td><td><u>VMT/Employee</u></td><td><u>Home Based Work Trips</u></td><td><u>15% Reduction of Regional Average</u></td><td><u>13.52</u></td><td><u>11.49</u></td></tr><tr><td><u>Industrial</u></td><td><u>VMT/Employee</u></td><td><u>Home Based Work Trips</u></td><td><u>15% Reduction of Regional Average</u></td><td><u>13.52</u></td><td><u>11.49</u></td></tr><tr><td><u>Retail</u></td><td><u>Unincorporated VMT</u></td><td><u>All Trip Types</u></td><td><u>No Net Increase in Regional VMT</u></td><td><u>7,500,249</u></td><td><u>7,500,249</u></td></tr><tr><td><u>Agriculture</u></td><td><u>Unincorporated VMT</u></td><td><u>All Trip Types</u></td><td><u>No Net Increase in Regional VMT</u></td><td><u>7,500,249</u></td><td><u>7,500,249</u></td></tr><tr><td><u>Infrastructure</u></td><td><u>Unincorporated VMT</u></td><td><u>All Trip Types</u></td><td><u>No Net Increase in Regional VMT</u></td><td><u>7,500,249</u></td><td><u>7,500,249</u></td></tr><tr><td><u>All Other Project Types</u></td><td><u>Unincorporated VMT</u></td><td><u>All Trip Types</u></td><td><u>No Net Increase in Regional VMT</u></td><td><u>7,500,249</u></td><td><u>7,500,249</u></td></tr></table>	<u>Project Type</u>	<u>Measurement Unit</u>	<u>Model Trip Types</u>	<u>Minimum Criteria</u>	<u>Baseline VMT</u>	<u>Threshold VMT</u>	<u>Residential</u>	<u>VMT/Capita</u>	<u>Average of all Home Based Trip Types</u>	<u>15% Reduction of Regional Average</u>	<u>9.66</u>	<u>8.21</u>	<u>Office</u>	<u>VMT/Employee</u>	<u>Home Based Work Trips</u>	<u>15% Reduction of Regional Average</u>	<u>13.52</u>	<u>11.49</u>	<u>Industrial</u>	<u>VMT/Employee</u>	<u>Home Based Work Trips</u>	<u>15% Reduction of Regional Average</u>	<u>13.52</u>	<u>11.49</u>	<u>Retail</u>	<u>Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase in Regional VMT</u>	<u>7,500,249</u>	<u>7,500,249</u>	<u>Agriculture</u>	<u>Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase in Regional VMT</u>	<u>7,500,249</u>	<u>7,500,249</u>	<u>Infrastructure</u>	<u>Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase in Regional VMT</u>	<u>7,500,249</u>	<u>7,500,249</u>	<u>All Other Project Types</u>	<u>Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase in Regional VMT</u>	<u>7,500,249</u>	<u>7,500,249</u>	SU
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		<p><u>If a proposed project is found to have a significant impact on VMT, the impact must be reduced, as feasible, by modifying the project's VMT to a level below the established thresholds of significance and/or mitigating the impact through multimodal transportation improvements or mitigations to enhance transportation mode shift (use of alternative transportation modes). Following completion and adoption of VMT thresholds as part of the Ventura County ISAG, this implementation program shall no longer apply.</u></p> <p>Mitigation Measure CTM-2: Revised Implementation Program CTM-B: Initial Study Assessment Guidelines</p> <p>The County shall include the following revised implementation program in the 2040 General Plan.</p> <p>Implementation Program CTM-B: Initial Study Assessment Guidelines</p> <p>The County shall update and adopt its' Initial Study Assessment Guidelines (ISAG) to address Vehicle Miles Traveled (VMT) and safety metrics pursuant to CEQA Guidelines Section 15064.3. <u>This program shall consider inclusion of the following components:</u></p> <ul style="list-style-type: none"> ▶ <u>Establishment of screening criteria to define projects not required to submit detailed VMT analysis, such as infill projects, inclusion of locally serving commercial, transit supportive projects, or transportation enhancements that reduce VMT;</u> ▶ <u>Establishment of thresholds for identifying VMT related transportation impacts (to meet or exceed State requirements);</u> ▶ <u>Standard mitigation for significant transportation impacts; and</u> ▶ <u>Specify the County's procedures for reviewing projects with significant and unavoidable impacts, under CEQA, related to VMT.</u> <p>Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program</p> <p>The County shall include the following revised implementation program in the 2040 General Plan.</p> <p>Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program</p> <p>To support climate change related goals and CEQA related VMT policies pursuant to SB 743 (2013), the County shall develop a VMT Reduction</p>	

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		<p>Program. This program should contain a range of project- and program-level mitigations and VMT reduction strategies, that could include:</p> <ul style="list-style-type: none"> ▶ Preparation of a Transportation Demand Management (TDM) program to promote mode shifts from single occupant vehicle use to transit, ridesharing, active transportation, telecommuting, etc.; and ▶ Transportation System Management applications such as park-and-ride lots, intelligent transportation system (ITS) field deployment, pavement management, etc. <p>During implementation of the 2040 General Plan, the County shall review and update the VMT Reduction Program as warranted to provide additional mitigations and programs.</p>	
Impact 4.16-2: Transportation Infrastructure Needed to Accommodate Growth Would Result in Adverse Effects Related to County Road Standards and Safety	PS	<p>Mitigation Measure CTM-4: New Implementation Program CTM-X: Updated Traffic Impact Fee Mitigation Program</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><u>Implementation Program CTM-X: Updated Traffic Impact Fee Mitigation Program</u></p> <p>The County shall require that discretionary development which adds traffic to roadways traversing within a County designated substandard roadway impact area contribute the fair share cost of any safety counter-measures that improve the safety of the impacted roadways by paying the applicable fees under the County's Traffic Impact Fee Mitigation program prior to the issuance of Zoning Clearance.</p>	SU
Impact 4.16-3: Result in Inadequate Emergency Access	PS	<p>Mitigation Measure CTM-5: New Policy CTM-X: Emergency Access</p> <p>The County shall include the following new policy in the 2040 General Plan.</p> <p><u>Policy CTM-X: Emergency Access</u></p> <p>The County shall ensure that all new discretionary projects are fully evaluated for potential impacts to emergency access. Mitigation of these impacts shall be handled on a project-by-project basis to guarantee continued emergency service operations and service levels.</p>	SU

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		Mitigation Measure CTM-6: New Implementation Program CTM-X: Emergency Access Maintenance The County shall include the following new implementation program in the 2040 General Plan. <u>Implementation Program CTM-X: Emergency Access Maintenance</u> The County shall plan capital improvements needed to provide transportation infrastructure that is maintained and/or upgraded to provide appropriate emergency access.	
Impact 4.16-4: Conflict With Adopted Policies, Plans, or Programs Regarding Public Transit, Bicycle, or Pedestrian Facilities, or Otherwise Decrease the Performance or Safety of Such Facilities	LTS	No mitigation is required for this impact.	LTS
Impact 4.16-5: Substantially Interfere with Railroad Facility Integrity and/or Operations	PS	Mitigation Measure CTM-7: New Policy CTM-X: Railroad Safety Assessment The County shall include the following new policy in the 2040 General Plan. <u>Policy CTM-X: Railroad Safety Assessment</u> The County shall require that all new discretionary development is evaluated for potential impacts to existing railroad facilities and operations and identify appropriate mitigation measures, as warranted therein.	LTS
Impact 4.16-6: Substantially Interfere with or Compromise the Operations or Integrity of an Existing Pipeline	LTS	No mitigation is required for this impact.	LTS
Utilities			
Impact 4.17-1: Cause a Disruption or Rerouting of an Existing Utility Facility	LTS	No mitigation is required for this impact.	LTS
Impact 4.17-2: Increase Demand on a Utility that Results in the Relocation or Construction of New, or Expansion of Existing Water, Wastewater, Electric Power, Natural Gas, or Telecommunications Infrastructure, Resulting in the Potential for Significant Environmental Impacts	PS	No additional feasible mitigation is available for this impact beyond the mitigation measures identified throughout the draft EIR. Refer to Impact 4.17-2 in Section 4.17 Utilities for explanation.	SU
Impact 4.17-3: Result in Inadequate Wastewater Treatment Capacity to Serve Future Demand, in Addition to the Provider's Existing Commitments	LTS	No mitigation is required for this impact.	LTS

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Impacts	Significance Before Mitigation	Mitigation Measures	Significance with Mitigation Measures
NI = No impact LTS = Less than significant PS = Potentially significant S = Significant SU = Significant and unavoidable N/A = discussion is provided for information purposes only and is neither required by CEQA nor subject to its requirements			
Impact 4.17-4: Result in Development That Would Adversely Affect Water Supply Quantities during Normal, Single-Dry, and Multiple-Dry Years	PS	<p>Mitigation Measure UTL-1: New Implementation Program WR-X: Demonstrate Adequate Water Supply during Normal, Single-Dry, and Multiple-Dry Years</p> <p>The County shall include the following new implementation program in the 2040 General Plan.</p> <p><u>Implementation Program WR-X: Demonstrate Adequate Water Supply during Normal, Single-Dry, and Multiple-Dry Years</u> <u>Water-demand projects (as defined in Section 15155 of the State CEQA Guidelines) that require service from a public water system shall prepare a water supply assessment prior to project approval. If the projected water demand associated with the project was not accounted for in the most recently adopted urban water management plan, or the public water system has no urban water management plan, the water supply assessment must address the public water system's total projected water supplies available during normal, single-dry, and multiple-dry water years for a 20-year projection. The assessment shall describe if the new water service will be sufficiently met under this 20-year projection. The water supply assessment shall be prepared to the satisfaction of and approved by the governing body of the affected public water system and the County. If, as a result of its assessment, the public water system concludes that its water supplies are, or will be, insufficient, the public water system shall provide to the County its plans for acquiring additional water supplies. A water-demand project that includes a new water service from a public water system shall not be approved unless adequate water supplies are demonstrated.</u></p>	SU
Impact 4.17-5: Result in a Direct or Indirect Adverse Effect on a Landfill's Disposal Capacity, Such That It Reduces Its Useful Life to Less Than 15 Years	LTS	No mitigation is required for this impact.	LTS

3 PROJECT DESCRIPTION

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

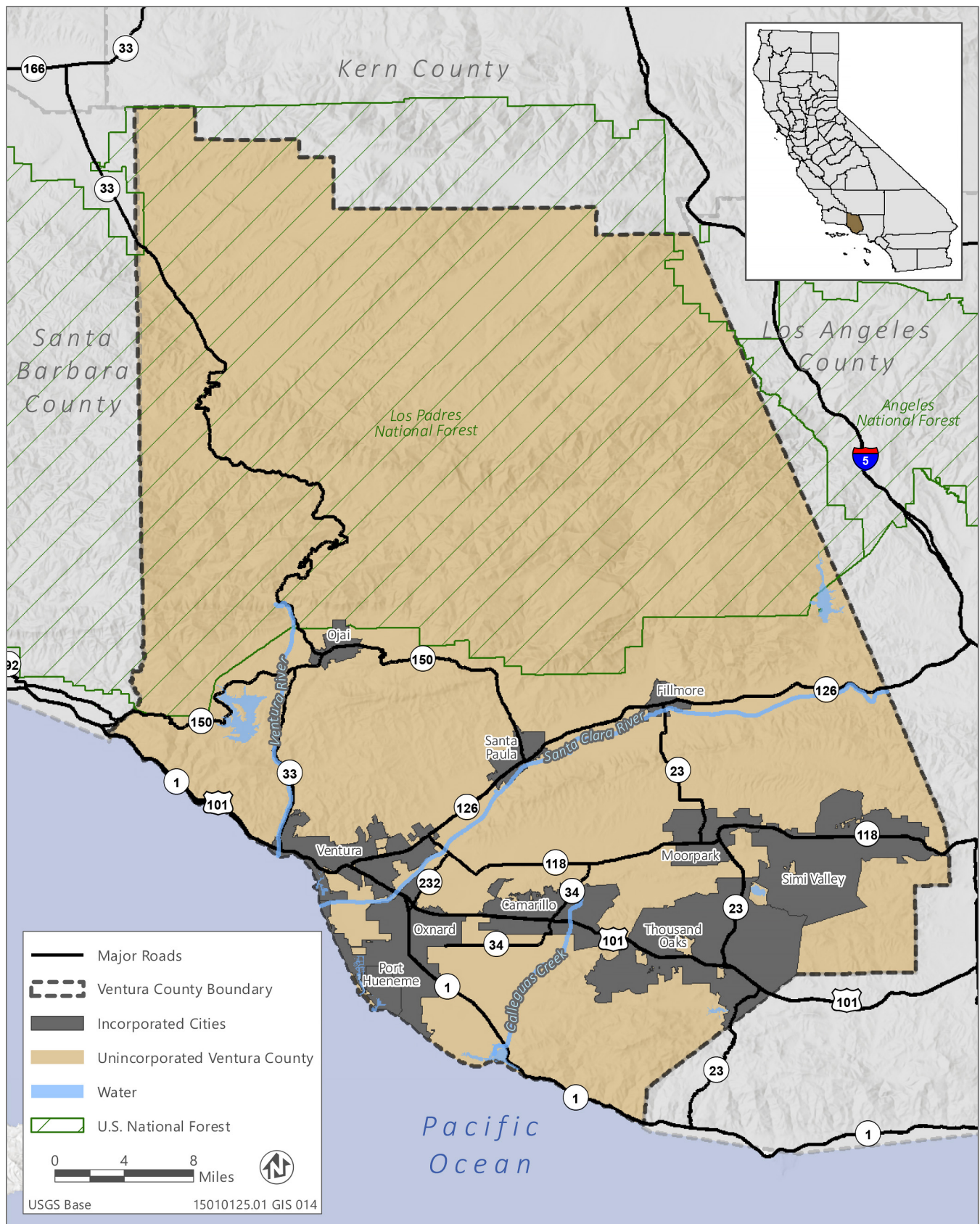
The proposed project is a comprehensive update of the existing General Plan for the County of Ventura. The 2040 General Plan establishes the County’s vision for development and resource management through the year 2040 and will serve as the fundamental land use and resource policy document for the County. This chapter of the draft EIR describes the key characteristics of the 2040 General Plan, including the geographic extent of the plan, objectives, development forecasted for the plan area, and required approvals.

3.1 GEOGRAPHIC EXTENT OF THE PLAN AREA

Ventura County is one of the six counties that collectively form the Central Coast region of California. It was created on January 1, 1873, when it separated from Santa Barbara County. Ventura County covers 1.2 million acres bordered by the Pacific Ocean to the southwest, Los Angeles County to the southeast and east, Santa Barbara County to the west, and Kern County to the north (Figure 3-1). The Los Padres National Forest accounts for approximately 574,000 acres, or 47 percent of the county’s total land area. This includes privately owned inholdings surrounded by Los Padres National Forest which are not part of the national forest. Outside of the Los Padres National Forest, there are approximately 528,000 acres of land in the unincorporated area (43 percent) and 121,000 acres in the county’s 10 incorporated cities (10 percent). In addition to the mainland part of the county, two of the eight Channel Islands off the coast (San Nicolas Island and Anacapa Island) are also part of Ventura County. Anacapa Island is approximately 700 acres and is located within the Channel Islands National Park. San Nicolas Island encompasses approximately 14,000 acres and is located 65 miles south of Naval Base Ventura County Point Mugu. Managed by the US Navy, San Nicolas Island serves as a launch platform and observation platform for short- and medium-range missile testing. Anacapa Island covers approximately 3,200 acres and is located 14 miles from the coast of Ventura County; it is one of the most visited islands of Channel Islands National Park because of its proximity to the mainland.¹

The County of Ventura has land use regulatory authority over most unincorporated land in the county, but lacks land use authority within the incorporated cities in the county: Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Santa Paula, Simi Valley, Thousand Oaks, and Ventura. The County also does not have land use authority over land in the unincorporated area that is 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), except for portions of State parks and other State land located in the coastal zone. Under State law, the County has land use authority over land owned or managed by special districts in the unincorporated area (e.g., cemetery districts, water districts), subject to limited exceptions.

¹ Note: the 2040 General Plan and associated mapping focus on the mainland areas of the county. This EIR follows the same convention. San Nicolas is designated State or Federal Facility. Anacapa Island is designated Open Space.



Sources: Ventura County 2016; California Department of Transportation 2007

Figure 3-1 Project Location

3.2 BACKGROUND AND DEVELOPMENT OF THE GENERAL PLAN

The Ventura County General Plan was most recently updated in 2005 and has not been comprehensively updated since 1988. The current, comprehensive update process was initiated in 2015. To reach a wide variety of county residents and stakeholders, Ventura County Resource Management Agency, Planning Division staff conducted extensive community outreach to secure initial public, focus group, and advisory body input on the development of the draft 2040 General Plan. The County gathered community input through the following methods:

- ▶ Public Opinion Survey;
- ▶ Focus Groups;
- ▶ Workshops, Open Houses, and Informational Sessions;
- ▶ Agricultural Policy Advisory Committee;
- ▶ Public Presentations;
- ▶ Municipal Advisory Councils and Piru Neighborhood Council; and
- ▶ Project Website – www.VC2040.org;
- ▶ Planning Commission and Board of Supervisors Meetings, Work Sessions, and Hearings.
- ▶ Technical Advisory Committee;

The preliminary public review draft of the 2040 General Plan was released for public review on May 9, 2019. Following public input and workshops with the Planning Commission and Board of Supervisors, a public draft 2040 General Plan was released for public review in January 2020.

3.2.1 Alternatives Report

During 2018, the public and the County's Planning Commission and Board of Supervisors engaged in an alternatives process designed to guide development of the 2040 General Plan. The purpose of the alternatives process was to consider future land use and policy options and help the Planning Commission and Board of Supervisors select a Preferred Alternative that provided the framework for preparing the 2040 General Plan. The Alternatives Report was presented to the Board of Supervisors and Planning Commission during joint work sessions in July and November 2018 (Ventura County 2018). The Alternatives Report established a framework for the 2040 General Plan by providing direction on the following:

- ▶ Vision Statement and Guiding Principles,
- ▶ Proposed General Plan Organization,
- ▶ Preferred Land Use Alternative, and
- ▶ Policy Choices.

VISION STATEMENT AND GUIDING PRINCIPLES

A vision statement reflects what community members value most about the county and their shared aspirations for the future. The 2040 General Plan Vision Statement is intended to be inspirational and set the direction for the general plan's goals, policies, and implementation

programs. The visioning process helped to identify issues important to the community and provided early direction for alternatives development and analysis during the update process.

The Vision Statement and Guiding Principles for the 2040 General Plan provide general direction for the future and introduce key themes that are addressed. Specifically, the Guiding Principles serve as touchstones to guide consistency of goals, policies, and implementation programs with the overarching vision. The Vision Statement and Guiding Principles were reviewed and recommended by the Board of Supervisors in 2018 as part of the Alternatives Report process.

The following is the 2040 General Plan Vision Statement:

Ventura County is an exceptional place to live, work, and play. Our quality of life and economic vitality are rooted in the stewardship of our cultural and natural resources, including agricultural lands and soils, open spaces, mountains and beaches, and talented people. The General Plan reflects the County's ongoing commitment to collaborate with residents, cities, businesses, and non-profit organizations to meet our social and economic needs in a sustainable manner, to protect the environment and address climate change, and to encourage safe, healthy, vibrant, and diverse communities to thrive.

The Guiding Principles are included in Section 3.3 below and serve to guide the development of the policies and implementation programs in each element. The Guiding Principles also serve as the project objectives for the 2040 General Plan in this draft EIR.

PROPOSED GENERAL PLAN ORGANIZATION

This chapter of the Alternatives Report presented the 2040 General Plan's proposed organizational structure, land use designations, and updated set of land use density and intensity standards.

2040 General Plan Land Use Designations

The existing General Plan contains a simplified set of six land use designations and one overlay land use designation, which describe the purpose of the designation and allowed uses. While a few existing land use designations prescribe density, intensity, and lot size, the key designations of Existing Community and Urban do not. The existing General Plan land use designations are broad categories that lack clear details to distinguish between separate land uses, such as residential, commercial, and industrial.

To address this, the 2040 General Plan would establish 15 land use designations that provide more detailed information on the types of land uses (e.g., commercial, industrial, residential) that would be allowable within areas currently designated as Existing Community and Urban land use designations. The 2040 General Plan land use designations would be consistent with land uses and densities/intensities allowed under the current (2018) zoning designations for each affected parcel. The proposed 2040 General Plan land use designations replace the Existing Community and Urban land use designations of the existing General Plan with a new set of designations that clearly distinguish the land uses allowed and set forth maximum development density and intensity standards.

Where the existing General Plan contained minimum lot size requirements, these are maintained in the 2040 General Plan. Proposed new land use designations that do not have a comparable minimum lot size in the existing General Plan would incorporate the smallest minimum lot size of the compatible zoning designation.

As part of the 2040 General Plan, several key designations are maintained as presented in the existing General Plan. All lands in the existing General Plan with a land use designation of Agricultural, Open Space, or Rural located outside of Existing Community and Urban designated areas are maintained unchanged. This ensures the 2040 General Plan remains consistent with the Save Open Space & Agricultural Resources [SOAR] initiative. The current Existing Community and Urban designations were retained as new area designations in the 2040 General Plan. Also retained are the lands designated as State and Federal Facility, which is applied to parcels owned by the State or federal government and are outside of the County's land use jurisdiction. The only change to this designation is its name, which in the 2040 General Plan is under the term "State, Federal, Other Public Lands." There is a new land use designation for "Parks and Recreation," which provides for parks and recreation facilities and associated recreation uses. There is no land currently in the Parks & Recreation designation. This new designation will be applied to parcels within Existing Community, Area Plans, and Urban Centers within Areas of Interest that provide for parks and recreation facilities and associated recreation uses to serve all residents in Ventura County. A new zone classification titled Parks and Recreation (REC) would also be established for parks and recreational uses in the Non-Coastal Zoning Ordinance and Coastal Zoning Ordinance that would be compatible with this land use designation and separate from the General Plan Update project as part of the 2040 General Plan's implementation.

Two changes are also proposed for lands within or adjacent to the incorporated cities in the county. As the County does not have land use authority over lands within the cities, these areas are noted as "City" on the 2040 General Plan Land Use Diagram and not given a land use designation. The final land use designation change is the proposed removal of the Urban Reserve Overlay. This overlay is replaced by a policy that references the use of adopted spheres of influence to provide the same geographic boundary. Table 3-1 provides the land use designations that would be established and used by the 2040 General Plan.

Table 3-1 Land Use Designation General Development Standards

Acronym	Land Use Designation	Maximum Density / Intensity	Minimum Lot Size	Maximum Lot Coverage ¹
Rural, Agricultural, and Open Space Designations				
RUR	Rural ²	1 du/2 ac	2 acres, or zone suffix equal to or more restrictive than 2 acres	25%
ECU-R ³	ECU-Rural	1 du/2 ac	2 acres	25%
AG	Agricultural ²	1 du/40 ac	40 acres	5%
ECU-A ³	ECU-Agricultural	1 du/40 ac	40 acres	5%
OS	Open Space ²	1 du/parcel	10 acres, or 20 acres if contiguous w/Agricultural	5%
ECU-OS ³	ECU-Open Space	1 du/parcel	10 acres, or 20 acres if contiguous w/Agricultural	5%
Residential Designations				
VLDR	Very Low Density Residential	4 du/ac	10,000 SF	n/a

Acronym	Land Use Designation	Maximum Density / Intensity	Minimum Lot Size	Maximum Lot Coverage ¹
LDR	Low-Density Residential	6 du/ac	6,000 SF	n/a
MDR	Medium-Density Residential	14 du/ac	3,000 SF	n/a
RHD	Residential High-Density	20 du/ac	No minimum	n/a
RPD	Residential Planned Development	20 du/ac	No minimum	n/a
CRPD	Coastal Residential Planned Development	36 du/ac	No minimum	n/a
RB	Residential Beach	36 du/ac	1,500 SF	n/a
Mixed Use, Commercial, and Industrial Designations				
MU	Mixed Use	20 du/ac; 60% lot coverage	No minimum	60%
C	Commercial	60% lot coverage	No minimum	60%
CPD	Commercial Planned Development	60% lot coverage	No minimum	60%
I	Industrial	50% lot coverage	10,000 SF	50%
Other Designations				
PR	Parks & Recreation	n/a	None	5%
P	State, Federal, Other Public Lands ²	n/a	None	n/a

Notes: ac = acre; du = dwelling unit; n/a = not applicable; SF = square foot.

¹ Maximum lot coverage is per applicable County zoning classification.

² Existing General Plan land use designations that would be retained.

³ The acronym "ECU-" preceding a designation name refers to land use designations that apply only within the boundaries of an Existing Community or Urban area designation (boundary) as defined in 2040 General Plan Policies LU-1.2 and LU-2.1.

PREFERRED LAND USE ALTERNATIVE

The land use alternative recommended in the Alternatives Report consists of two parts: Proposed 2040 General Plan Land Use Designations and the Regional Housing Needs Allocation (RHNA). The proposed 2040 General Plan land use designations provide a more refined range of designations, compared to the existing General Plan, with clear density ranges to accommodate the County's housing needs. To comply with housing element law (Government Code Section 65863), the County must demonstrate that there is adequate capacity in the unincorporated area to accommodate the development of dwelling units that are affordable for all household income categories (i.e., extremely low, very low, low, moderate, and above moderate-income) based on the existing zoning and general plan designations.

As discussed further below, the County's existing housing element was adopted in 2013 and will remain in effect through 2021. The 2040 General Plan integrates the County's current 2014–2021 Housing Element by formatting the document to be consistent with the 2040 General Plan.

Housing Element

This component of the Preferred Land Use Alternative would include an analysis of the County's currently identified potential housing sites to ensure that the County can demonstrate that there is adequate capacity based on the proposed land use designations and existing Non-Coastal Zoning Ordinance and Coastal Zoning Ordinance development standards to

accommodate the development of dwelling units that are affordable for all household income categories (i.e., extremely low, very low, low, moderate, and above moderate income). However, housing need (by income level) is based on the Regional Housing Needs Allocation (RHNA) data from the Southern California Association of Governments (SCAG) and follows a planning cycle that is distinct from the 2040 General Plan. SCAG will release draft RHNA numbers for the 2021–2029 Housing Element update cycle in February 2020, with final RHNA numbers expected in October 2020. For this reason, the RHNA component of the alternative will be addressed as part of the Housing Element that will occur subsequent to the adoption of the 2040 General Plan.

POLICY CHOICES

The final component of the Alternatives Report included a definition of key policy changes that would be pursued in the development of the 2040 General Plan. This included the identification of opportunities to streamline existing goals, policies, and programs by eliminating redundant policies and programs; removing language that restates requirements to comply with federal, State, or local legislation/regulations. The Alternatives Report also laid out an overview of the statutory requirements for general plans pursuant to Government Code Section 65302 and defined the element organization designed to meet these requirements. In addition to addressing the State-required elements, the Alternatives Report identified three new optional elements for the 2040 General Plan: Agriculture Element, Water Resources Element, and Economic Vitality Element.

3.2.2 Relationship to Other Plans and Regulations

A general plan is distinct from a zoning ordinance and other land use planning documents. Although all these documents regulate how land may be used and developed, they do so in different ways. A general plan has a long-term outlook that identifies the types of development that are allowed, the spatial relationships among land uses, and the general pattern of future development. A zoning ordinance implements a general plan by regulating development through specific standards, such as lot size, building setback, setting allowable uses, or through infrastructure improvements and financing. Development must not only meet the specific requirements of the zoning ordinance but also the broader policies set forth in the general plan.

There are also nine Area Plans that are incorporated and made part of the 2040 General Plan. An Area Plan specifies the distribution, location, types, and intensity of land uses, and provides specific policies concerning development in a distinct geographical area. The goals, policies, and programs of an Area Plan are designed to supplement, not duplicate, the General Plan. See Section 3.4.2, below, for further details.

LAND USE PLANNING CONTEXT AND GROWTH MANAGEMENT

One of Ventura County's distinguishing characteristics is its open space and scenic character. The County is dedicated to directing urban development to cities and existing unincorporated communities to preserve its working and rural landscapes, agricultural lands, scenic vistas, natural resources, and recreational opportunities. The County has a direct role in maintaining agricultural, rural, and open space areas and shaping the character of urban development. At the same time,

the County seeks to support and encourage the cities in their land use planning efforts to ensure that a quality living environment is provided for all existing and future county residents.

Ventura County is unique in California because of the successful countywide land use planning efforts that have preserved the county's open space and scenic character, as described further below.

Guidelines for Orderly Development

The County of Ventura, cities within the county, and the Ventura Local Agency Formation Commission (LAFCo) adopted the Guidelines for Orderly Development to direct urban-level development and services to the incorporated areas. Through Policies LU-1.1 and LU-2.1 in the 2040 General Plan, the County would continue to work with these entities to promote and maintain reasonable city boundaries and spheres of influence to prevent growth-inducing urban development in unincorporated areas, and require unincorporated urban development to be located in areas designated as Existing Communities and unincorporated urban centers consistent with the Guidelines for Orderly Development.

Greenbelt Agreements

Greenbelt agreements, voluntary agreements between the County and one or more cities, are used to limit development of agricultural and/or open space areas within the unincorporated county. Through greenbelt agreements, cities express their commitment to not annex any property within a greenbelt while the County expresses its commitment to restrict development to uses consistent with existing agricultural or open space zoning. There are seven greenbelts in Ventura County totaling approximately 164,000 acres.

Save Open Space & Agricultural Resources Initiative

Ventura County voters first approved the countywide SOAR initiative in 1998. In general, and subject to certain exceptions, SOAR requires countywide voter approval of any (1) substantive change to the general plan's agricultural, open space, or rural land use goals or policies, and (2) redesignation of land with these general plan land use designations. In November 2016, Ventura County voters renewed the County's SOAR initiative and extended its provisions through 2050. Similarly, voters in eight of the county's 10 cities renewed SOAR initiatives adopted by the respective jurisdictions that are applicable within their boundaries (the cities of Ojai and Port Hueneme have not adopted SOAR measures). SOAR measures within cities establish voter-controlled urban growth boundaries, known as City Urban Restriction Boundaries. The County SOAR initiative's Agricultural, Open Space, and Rural goals and policies are included in the 2040 General Plan with only technical, non-substantive revisions for clarification and internal consistency with the rest of the 2040 General Plan.

3.3 GENERAL PLAN OBJECTIVES

Section 15124 of the State CEQA Guidelines requires an EIR to include a statement of project objectives. The objectives assist the County, as lead agency, in developing a reasonable range of alternatives to be evaluated in this draft EIR. The project objectives also aide decision makers in preparing findings and, if necessary, a statement of overriding considerations. The statement of objectives also includes the underlying purpose of the project.

For this draft EIR, the project objectives are defined as being expressed by the Guiding Principles contained in Section 1.2 of the 2040 General Plan. The project objectives are defined as follows:

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

3.4 STRUCTURE AND CONTENT OF THE GENERAL PLAN

The 2040 General Plan sets forth the goals and policies based on the Vision Statement and Guiding Principles that will guide future land use and resource decisions within the unincorporated areas of the county and identifies the implementation programs required to carry out the goals and policies of the 2040 General Plan. The 2040 General Plan also includes land use designations and a Land Use Diagram that specifies the allowable uses of land (e.g., residential, commercial) throughout the unincorporated area.

The 2040 General Plan addresses topics and issues pursuant to State requirements adopted since the existing general plan was approved in 2005. These include environmental justice, transportation issues such as assessing vehicle miles traveled (VMT) and analyzing transportation systems more holistically (e.g., “Complete Streets”), and wildfire hazards. It is designed to maintain consistency with the Guidelines for Orderly Development, greenbelt agreements, and SOAR measures for Ventura County’s unincorporated areas and ten incorporated cities. The 2040 General Plan also includes a Climate Action Plan which, among other things, will include a vulnerability analysis and describe how the County plans to reduce greenhouse gas emissions and adapt to a changing climate.

As part of the General Plan update process, the County assessed the goals, policies, and programs in the existing General Plan and the County Area Plans. Seven of the Area Plans (El Rio/Del Norte, Lake Sherwood/Hidden Valley, North Ventura Avenue, Oak Park, Ojai Valley, Piru, and Thousand Oaks) would be refined as part of the 2040 General Plan. These seven Area Plans were reviewed and assessed to compare the Area Plan goals, policies, and programs with 2040 General Plan goals, policies, and programs to ensure internal consistency. The proposed refinements typically take the form of applying a common writing style and order of presentation to each Area Plan while maintaining the original intent. A few policies are proposed for removal from individual Area Plans and incorporation into one of the 2040 General Plan elements. This change would maintain the policy and broadened its coverage from a single Area Plan to the entire unincorporated county. All changes proposed in the 2040 General Plan are presented in a legislative format that tracks the changes made.

The remaining two Area Plans (Coastal and Saticoy) were not updated as part of the 2040 General Plan process.

GENERAL PLAN ELEMENTS

The 2040 General Plan elements are organized as follows: Land Use and Community Character Element; Housing Element; Circulation, Transportation, and Mobility Element; Public Facilities, Services, and Infrastructure Element; Conservation and Open Space Element; Hazards and Safety Element; Agriculture Element; Water Resources Element; and Economic Vitality Element. Each element contains goals and policies that the County will use to guide future land use, development, resource management, and environmental protection decisions. The 2040 General Plan is intended to provide a more concise and clear policy statement for the County, compared to the existing General Plan, by reducing redundant policies (similar policies that are presented in several elements and/or Area Plans), and by removing items that are simply restatements of requirements specified in State or federal regulations.

The following provides a brief summary of each element of the 2040 General Plan.

Land Use and Community Character Element

The Land Use and Community Character Element establishes a pattern and intensity of land use that directs urban growth away from agricultural, rural, and open space lands, in favor of locating it in cities and unincorporated communities where public facilities, services, and infrastructure are available or can be provided. This element serves as the primary vehicle for ensuring that new land uses are logically organized and developed in a way that is sustainable and enhances Ventura County's unique identity. The element includes goals, policies, and implementation programs related to growth management; and use designations and standards; Area Plans; character and design; environmental justice; civic engagement; development review and inter-agency coordination; and military compatibility. The goals and policies identify the County's philosophy for future change, development, and natural resource protection.

Housing Element

The Housing Element ensures that there is adequate land in the unincorporated area to accommodate the County's fair share of population growth as defined by the RHNA. The County adopted the current 2014–2021 Housing Element in 2013 to identify and address housing needs in the county in compliance with State housing regulations. The 2040 General Plan integrates the County's current 2014–2021 Housing Element by formatting the document to be consistent with the 2040 General Plan.

The next cycle of housing element updates for cities and counties within the SCAG region will cover the planning period from 2021 to 2029. As part of this process, SCAG will work with the County and the cities within the county to develop a RHNA. The RHNA process requires the County to identify land available to accommodate the development of adequate housing for all household income categories (i.e., extremely low, very low, low, moderate, and above moderate-income) in the unincorporated area. As indicated above, SCAG will release draft RHNA numbers for the 2021–2029 Housing Element update in February 2020, with final RHNA numbers expected in October 2020. The County will subsequently initiate the Housing Element update in 2020; therefore, it is not included in the 2040 General Plan currently under review. Rather, a placeholder Housing Element chapter is included in the draft 2040 General Plan.

Circulation, Transportation, and Mobility Element

The Circulation, Transportation, and Mobility Element focuses on creating and maintaining a transportation network that both meets the needs of all users for safe and convenient travel, and is suitable in rural, suburban, or urban contexts. The element also serves as a strategy for addressing infrastructure needs to ensure the adequate circulation of people, goods, and services. The element includes policies related to the design, construction, and maintenance of the roadway system, the regional multimodal system; reduction of per capita VMT; safe, efficient, and reliable air transportation; and includes policies that support use emerging technologies and environmentally-sustainable practices to increase transportation system efficiency and resiliency.

Public Facilities, Services and Infrastructure Element

The intent of the goals, policies, and programs included in the Public Facilities, Services and Infrastructure Element is to develop and maintain essential public facilities and services, prioritize energy efficiency, and ensure adequate levels of infrastructure funding, wastewater treatment and disposal, solid and hazardous waste management, flood control and drainage, public utilities, community facilities, library facilities and services, parks and recreation facilities, law enforcement and emergency services, and fire protection. This element provides the framework for decisions concerning public and private infrastructure, utilities, and services.

Conservation and Open Space Element

The intent of the Conservation and Open Space Element is to conserve and enhance the county's natural and open space environment for present and future residents. This element addresses a variety of topics, including open space, habitat conservation, energy resources, greenhouse gas (GHG) emissions, and climate change. The Conservation and Open Space Element is coordinated with the Land Use and Community Character Element to guide and balance conservation and development within the unincorporated area.

Hazards and Safety Element

The intent of the Hazards and Safety Element is to protect the community from any unreasonable risks associated with the effects of wildfire hazards, flood hazards, sea level rise and coastal flooding, geologic and seismic hazards, hazardous materials, transportation related hazards, oil and gas production and transportation incidents, military compatibility, noise, air quality, and increasing temperatures. This element establishes goals and policies to protect life, minimize property damage, and maintain or restore services during future disasters and emergencies. Specifically, this element includes policies and programs that would improve the County's resilience to climate change.

Agriculture Element

The intent of the Agriculture Element is to protect, preserve, and expand productive agriculture. This element addresses several topics including preservation of agricultural land, agricultural and urban area compatibility, innovative specialty agriculture, food security, sustainable farming and ranching, and resilience to climate change.

Water Resources Element

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

Economic Vitality Element

The Economic Vitality Element focuses on supporting a resilient economy that promotes economic health of the county, sustainable funding for public services, a thriving business environment, and job retention and growth. Goals, policies, and implementation programs in this element pertain to business and employment; creating a diversified economy and fostering strong economic foundations by facilitating the retention, expansion, and attraction of key industries and businesses, diversifying the economic base of the county, and promoting a strong local economy by improving critical infrastructure, including water, transportation, broadband, and renewable energy; and developing the labor force.

LAND USE DIAGRAM

The purpose of the 2040 General Plan Land Use Diagram is to guide the general distribution, location, and extent of the various land use designations throughout the county. The land use designations established in the 2040 General Plan are listed in Tables 3-1 and 3-2 and depicted on Figures 3-2a and 3-2b. The approximate acreage and percent of total acreage in

the unincorporated portions of the county for each land use designation is also provided in Table 3-2.

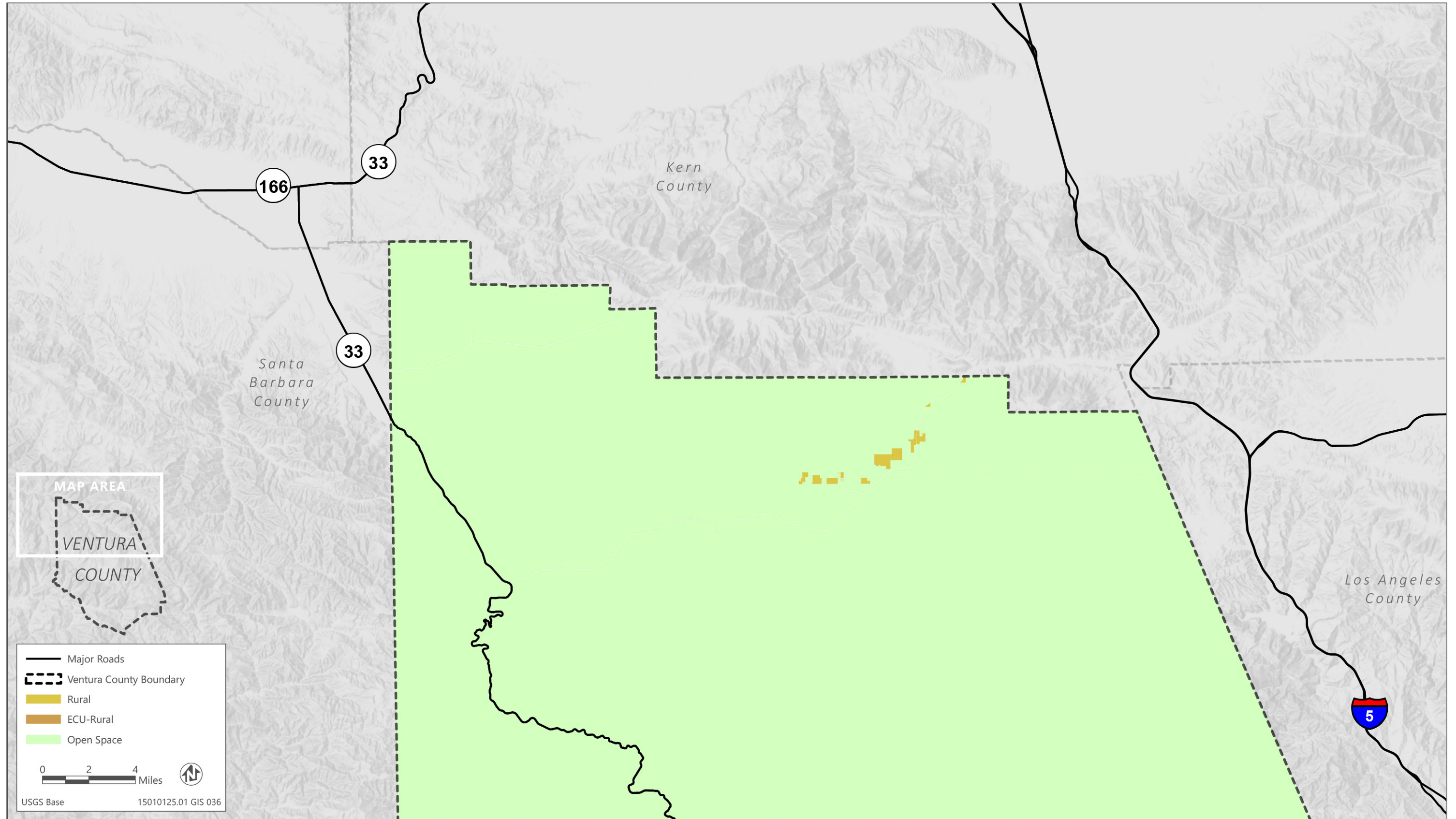
Table 3-2 Land Use Designation Descriptions and Acreage in the Plan Area

Land Use Designation	Description	Acreage	Percent of County Total
Rural	Identifies areas suitable for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes. The areas considered for inclusion in the Rural designation are existing clusters of rural development and areas deemed appropriate for future rural residential development.	8,764	<1%
ECU-Rural	Provides a physical transition between the outer edges of an Existing Community or Urban Area and nearby agricultural and open space areas and uses. Typical building types include large-lot, single-family homes in a rural setting.	1,114	<1%
Agricultural	Applied to irrigated lands suitable for the cultivation of crops and the raising of livestock.	91,485	9%
ECU-Agricultural	Applied to irrigated lands suitable for the cultivation of crops and the raising of livestock within the boundaries of an Existing Community designated area.	102	<1%
Open Space	Applied to any parcel or area of land or water which is essentially unimproved and devoted to an open-space use, as defined under Section 65560 of the Government Code.	917,716	88%
ECU-Open Space	Provides for areas with significant natural resources that should remain in open space, used for recreation, or preserved and used for resource production (e.g., mining) and are located within the boundaries of an Existing Community designated area.	233	<1%
Very Low Density Residential	Provides a physical transition between the outer edges of an Existing Community or Urban Area and nearby agricultural and open space areas and uses. Typical building types include large-lot, single-family homes in a rural setting.	7,572	<1%
Low-Density Residential	Provides for a variety of single-family homes and neighborhoods. Typical building types include small-lot, single-family homes, and other similar housing types, such as second units.	1,050	<1%
Medium-Density Residential	Provides a transition from lower density, single-family areas and more intensely developed residential and commercial areas; generally, applies to residential neighborhoods and central areas within Existing Communities and Urban Areas. Development at the higher end of the density allowed should occur along major transportation routes or adjacent to commercial centers. Typical building types include one- to three-story attached single-family dwellings and lower density multifamily developments.	25	<1%
Residential High-Density	Provides for residential development in more intensely developed residential and commercial areas. Development at the higher end of the density allowed should occur along major transportation routes and within major commercial centers. Generally, applies to central areas within Existing Communities and Urban Areas. Typical building types include one- to three-story multifamily developments.	13	<1%
Residential Planned Development	Provides areas for residential communities which would be developed using modern land planning and unified design techniques that can be adjusted to better fit the unique needs of the project site.	1,732	<1%
Coastal Residential Planned Development	Provides areas for residential communities which would be developed using innovative site planning techniques. Generally, applies to areas appropriate for modern residential development within the boundaries of an Existing Community designated area in the coastal zone.	23	<1%
Residential Beach	Provides for small-lot, beach-oriented residential communities. Generally, applies to areas appropriate for high-density residential development within the boundaries of an Existing Community designated area in the Coastal Zone.	185	<1%
Mixed Use	Provides for the development of activity centers that contain a mix of compatible and integrated commercial, office, residential, civic, and/or recreational uses. Developments should be located on an arterial or higher roadway classification and include appropriate	20	<1%

Land Use Designation	Description	Acreage	Percent of County Total
	pedestrian and bicycle facilities. Typical building types include one- to three-story horizontal or vertical mixed-use structures.		
Commercial	Provides for a mix of retail and service uses that are typically needed by residents in rural communities and surrounding agricultural operations. Developments may include a mix of uses and should be located on a County-defined Minor Collector or higher classification roadway and include pedestrian and bicycle facilities. Typical building types include one- to two-story commercial structures.	161	<1%
Commercial Planned Development	Provides areas for vibrant commercial centers which would be developed utilizing modern land planning and unified design techniques that can be adjusted to better fit the unique needs of the project site. Areas with this designation provide a flexible regulatory procedure in order to encourage the development of coordinated, innovative, and efficient commercial sites and to provide areas for a wide range of commercial retail and business uses, including stores, shops, and offices supplying commodities or performing services for the surrounding community.	158	<1%
Industrial	Provides for a range of industrial employment-generating uses, including production, assembly, warehousing, and distribution, that are conducted within enclosed buildings or in appropriately sited and screened outdoor work spaces that are designed for compatibility with surrounding land uses. Limited to areas served by, or planned to be served by, public water, wastewater, and drainage systems. Developments must be located on a County-defined Minor Arterial or higher classification roadway.	1,408	<1%
Parks & Recreation	Provides for parks and recreation facilities and associated recreation uses. Typically, these areas are characterized by a high degree of open space, and a limited number of buildings. Recreational facilities frequently include sports fields, playground equipment, picnic areas, sitting areas, concession businesses, open turf and natural areas, trails, and golf courses. Connectivity to surrounding areas via pedestrian and bicycle facilities is desired.	0 ¹	0%
State, Federal, Other Public Lands	This designation applies to State- and federally-owned parks, forests, rangelands, coastal resources, and/or recreation areas. For State land within the coastal zone, the County has land use authority except for land under the California Coastal Commission's original jurisdiction (i.e., beaches and tidelands). For all other areas within this designation the County has no land use authority. Areas so designated include land under federal or State ownership on which governmental facilities are located. Principal uses of these areas include: continued provision of public recreational facilities and access; multi-use management where applicable; support for rangeland activities, and interconnection or coordination of State, federal, and local facilities and programs when possible.	8,085	<1%
Total		1,039,847	100%

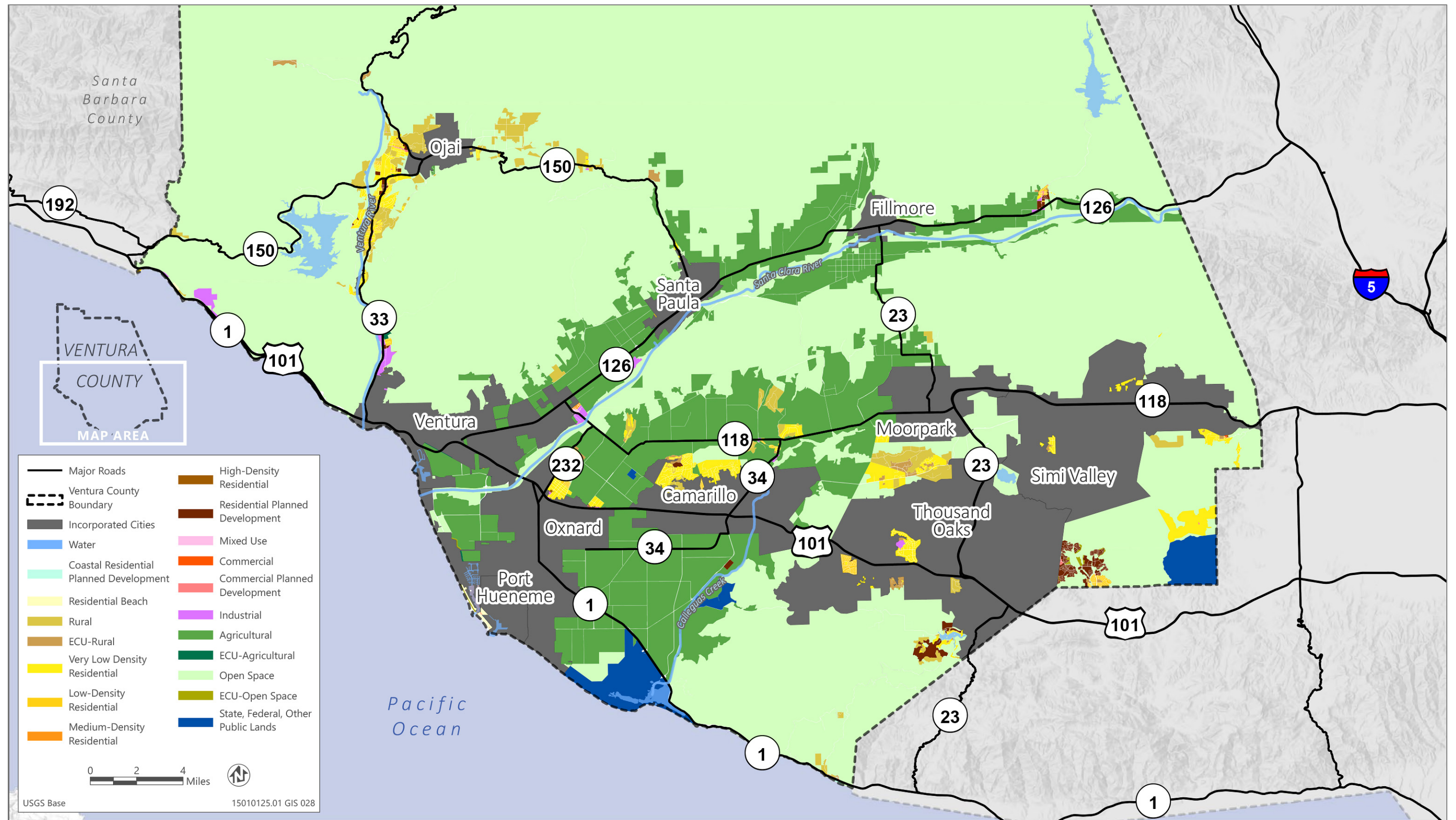
¹ There is no land currently in the Parks & Recreation designation. This is a new designation that can be applied to parcels within Existing Community, Area Plans, and Urban Centers within Areas of Interest that provide for parks and recreation facilities and associated recreation uses.

As shown in Table 3-2, the land use diagram of the 2040 General Plan would concentrate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). The Existing Community area designation includes existing land uses that have been developed with urban building intensities and urban land uses. The Urban area designation refers to areas with commercial and industrial uses and residential uses where the building intensity is greater than one principal dwelling unit per two acres. These areas are generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101.



Source: Data received from Ventura County in 2016

Figure 3-2a 2040 General Plan Land Use, Northern County



Source: Data received from Ventura County in 2016

Figure 3-2b 2040 General Plan Land Use, Southern County

Under the 2040 General Plan relatively higher intensity residential (Very Low Density, Low Density, Medium Density, Residential Planned Development, Coastal Planned Development, Residential Beach), commercial (Commercial and Commercial Planned Development), mixed use, and industrial land use designations would apply to approximately 1.2 percent of land in the unincorporated county. The types of future development that could occur in these land use designations include but are not limited to small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would remain unchanged from the existing General Plan and allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as composting operations, greenhouses, principal and accessory structures related to agriculture, and oil and gas wells. The areas considered for inclusion in the Rural designation are existing clusters of rural development and areas deemed appropriate for future rural residential development up to a maximum density of one dwelling unit per 2 acres. The Rural land use designation would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county is designated as either Open Space or Agriculture. The Open Space land use designation would be unchanged from the existing General Plan (covering 88 percent of the unincorporated county), allowing a minimum parcel size of 10 acres and one dwelling unit per parcel (see Table 3-1). The Open Space land use designation would also allow for development of other uses such as composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells.

An additional nine percent of the plan area is, and would remain, designated as Agriculture. The Agriculture land use designation would also remain unchanged from the existing General Plan, allowing for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. This designation is applied to irrigated lands suitable for the cultivation of crops and the raising of livestock and would also allow for other uses such as greenhouses, principal and accessory structures related to agriculture, and composting operations.

The remaining approximately 0.8 percent of land in the unincorporated county would be designated as State, Federal, Other Public Lands, which applies to land under federal or State ownership on which governmental facilities are located. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

GROWTH PROJECTIONS

Growth projections employed in the preparation of the 2040 General Plan were estimated for 2020, 2030, and 2040 using county-specific demographic projections prepared by SCAG for the 2020 Regional Transportation Plan and Sustainable Communities Strategy (SCAG 2017). As indicated in the SCAG population growth forecasts presented in Table 3-3, below, from 2015 to 2040 the growth in population and households (i.e., occupied housing units) is

anticipated to be approximately 4 percent and employment growth is expected to be approximately 9 percent.

Table 3-3 Growth Forecast for Unincorporated Ventura County, 2015–2040

Demographic	2015	2020		2030		2040	
	Number	Number	Percent Increase from 2015	Number	Percent Increase from 2015	Number	Percent Increase from 2015
Population	97,733	99,755	2.1	100,918	3.3	101,832	4.2
Employment	32,889	32,988	0.3	34,556	5.1	35,875	9.1
Households	32,191	32,446	0.08	32,959	2.4	33,472	4.0

Notes: Employment and housing growth rates for 2040 interpolated from reported years 2035 and 2045

Source: Calculated by Ascent Environmental using data provided by the Southern California Association of Governments (SCAG 2017)

Historically, most development has occurred within areas designated as Existing Community and Urban in the existing General Plan land use diagram. For example, between 2006 and 2018, an estimated 44 percent of new residential development occurred within areas designated as Existing Community or Urban. These are areas where higher-intensity residential development, a mixture of commercial and industrial uses, and additional infrastructure and services are most readily available to accommodate such growth. The remainder of the residential development during this period occurred in areas designated Rural (9 percent), Agricultural (23 percent), and Open Space (24 percent). Lower development trends in areas designated Rural, Agriculture, and Open Space are presumed to be based on numerous factors that vary from site to site, but include larger minimum lot sizes; lot coverage restrictions; limited access to water, utilities and infrastructure; fire code issues such as lack of secondary access; or a combination of these and other factors which can effectively prohibit or significantly increase the cost of new development in these areas.

Based on the similarities between the land use diagrams of the existing General Plan and 2040 General Plan and other factors influencing development, the County anticipates that allocation of future residential development would substantially follow historical trends with implementation of the 2040 General Plan. For example, to the extent historical residential development trends continue into the future, approximately 564 of the 1,281 additional households forecast in the unincorporated county between 2015 and 2040 (see Table 3-3) would be developed within areas of the county designated for residential, industrial, and mixed land uses. These areas account for approximately 1 percent of the total acreage of the unincorporated county area. In this example the remainder of the forecast residential development would be spread throughout the approximately 98 percent of the County's unincorporated areas in agriculture, open space, and rural land use designations (see Table 3-2).

3.5 KEY TERMS

The 2040 General Plan and this draft EIR use several terms to describe the county and areas beyond, including the following:

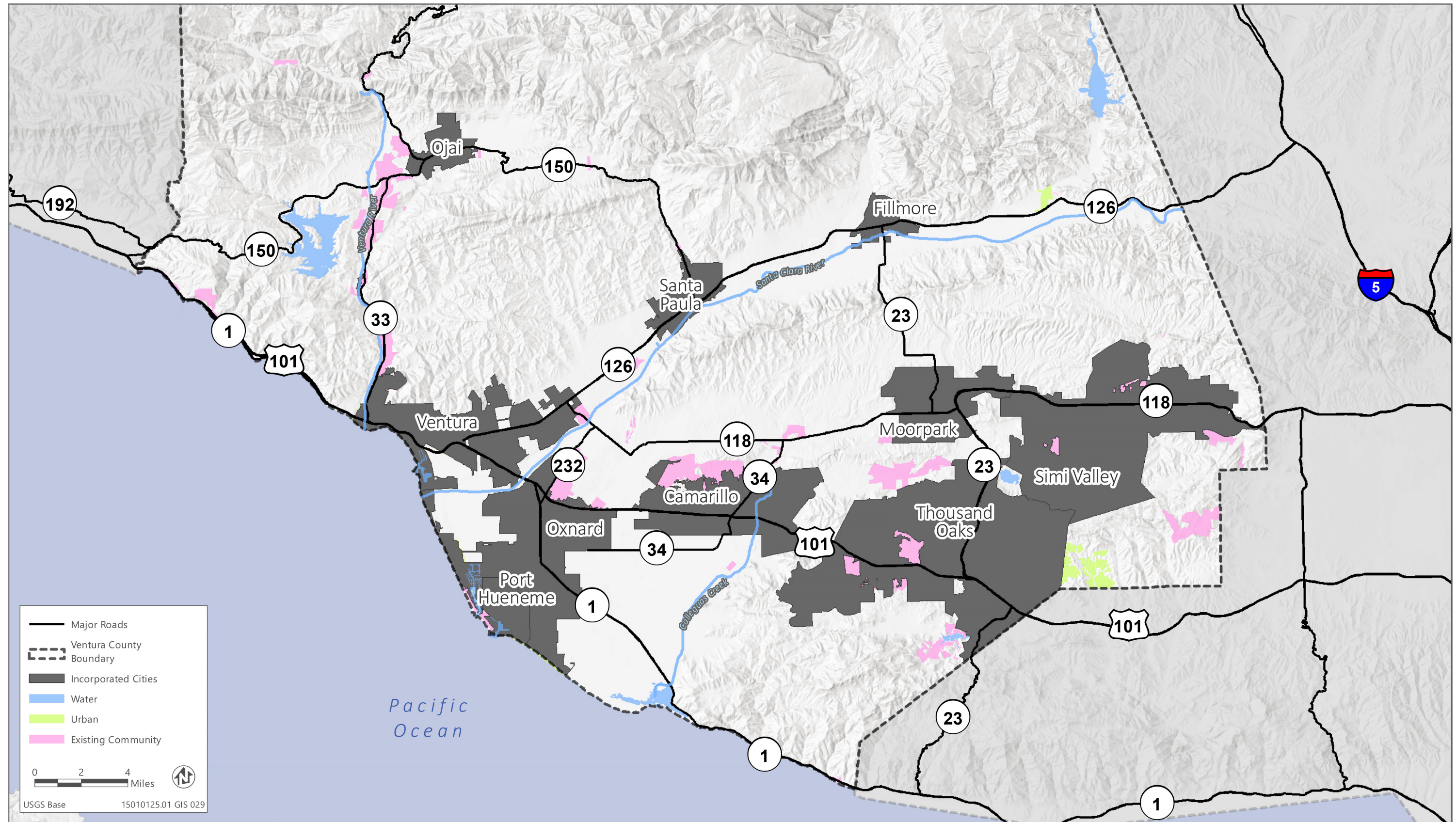
- ▶ **Area of Interest.** An Area of Interest is a major geographic area reflective of community and planning identity. The Ventura LAFCo established “areas of interest” in Ventura County in the late 1960s. Areas of interest divide the south half of Ventura County (the non-U.S. Forest Service land) into 15 major geographic planning areas based primarily on topography and community identity.
- ▶ **Area Plan.** Area plans are an integral part of a general plan. An Area Plan specifies the distribution, location, types and intensity of land uses, and provides specific policies concerning development in a distinct geographical area. The goals, policies, and programs of an Area Plan are designed to supplement, not duplicate the general plan, and, therefore, an Area Plan should be read in conjunction with the general plan. There are nine Area Plans: Coastal, El Rio/Del Norte, Lake Sherwood/Hidden Valley, North Ventura Avenue, Oak Park, Ojai Valley, Piru, Saticoy, and Thousand Oaks.
- ▶ **City.** Includes the area within a city’s corporate and jurisdictional boundary (city limits), for which it exercises land use authority.
- ▶ **County Boundary.** The jurisdictional boundary of the county.
- ▶ **Existing Community.** The Existing Community area designation (2040 General Plan Policy LU-1.2 and policies under Goal LU-3) identifies existing urban residential, commercial, or industrial enclaves located outside areas designated as Urban. This designation recognizes existing land uses in unincorporated areas that have been developed with urban building intensities and urban land uses; contains these enclaves within specific areas so as to prevent further expansion; and limits the building intensity and land use to previously established levels. The Existing Community and Urban area designations included in the 2040 General Plan (and are the same as the areas in the existing General Plan) and are shown on Figure 3-3.
- ▶ **Plan Area.** A general plan, pursuant to State law, must address all areas within the jurisdiction’s “plan area,” which is defined as the geographic territory of the local jurisdiction and any other territory outside its boundaries that bears relation to the planning of the jurisdiction. The jurisdiction may exercise its own judgment in determining what areas outside of its boundaries to include in the plan area. The plan area for the 2040 General Plan is the county boundary.
- ▶ **Sphere of Influence.** A Sphere of Influence is the probable ultimate physical boundary and service area of a local agency, as adopted by LAFCo. It includes both incorporated and unincorporated areas within which a city or special district will have primary responsibility for the provision of public facilities and services.
- ▶ **Unincorporated Urban Center.** An existing or planned community located in an area of interest where no city exists. The unincorporated urban center represents the focal center for community and planning activities within the area of interest. For example, the community of Piru represents the focal center in the Piru Area of Interest.

- ▶ **Urban.** The Urban area designation, referred to in the County’s SOAR initiative, is used to depict existing and planned urban centers. These include commercial and industrial uses, as well as residential uses where the building intensity is greater than one principal dwelling unit per 2 acres. In the existing General Plan, Urban was a land use designation that described allowable land uses. In the 2040 General Plan, this is an “area” designation that is only used to define a geographic area for purposes of SOAR implementation.
- ▶ **Goal.** A goal is a statement that describes in general terms a desired future condition or “end” state. Goals describe ideal future conditions for a topic and tend to be very general and broad.
- ▶ **Policy.** A policy is a clear and unambiguous statement that guides a specific course of action for decision-makers to achieve a desired goal.
- ▶ **Implementation Program.** An action, procedure, program, or technique that carries out general plan policy. While many policies can be implemented as part of standard County operations, some policies require specific programs to assure their implementation.

3.6 REQUIRED DISCRETIONARY ACTIONS

As the lead agency under CEQA, the County is responsible for considering the adequacy of the EIR and determining if the 2040 General Plan should be approved. Following the completion of the final EIR, the Ventura County Planning Commission will conduct a public hearing and make a recommendation on the 2040 General Plan to the Ventura County Board of Supervisors. The Ventura County Board of Supervisors will then conduct a separate public hearing to consider:

- ▶ Certification of the Final EIR for the 2040 General Plan Update, and
- ▶ Approval of the 2040 General Plan.



Source: Data received from Ventura County in 2019

Figure 3-3 Existing Community and Urban Area Designations

4 ENVIRONMENTAL IMPACT ANALYSIS

APPROACH TO THE ENVIRONMENTAL ANALYSIS

This chapter discusses the potential environmental impacts of future development in unincorporated areas of the county under the 2040 General Plan. It is organized by environmental resource category. The existing conditions against which potential impacts are evaluated are based on the environmental and regulatory setting information published in the January 2020 Background Report, which is included in this draft EIR as Appendix B. The Background Report takes a “snapshot” of existing conditions and trends in Ventura County. It is divided into 12 chapters that cover a wide range of topics within the county, such as demographic and economic conditions, land use, public facilities, and environmental resources. The Background Report is objective and provides decision-makers, the public, and local agencies with context for making policy decisions. The Background Report also serves as the basis for the environmental and regulatory setting of this draft EIR. The County published the public review draft of the Background Report in March 2017, followed by a revised public review draft in October 2017, and subsequent revisions in January 2018 and January 2020.

Where changes to the environmental or regulatory setting (e.g., new information, regulatory changes) are not included in the Background Report and these changes are relevant to understanding the 2040 General Plan’s potential impacts, additional background information is provided in the draft EIR resource section. The reader is referred to the Background Report for all other setting information. Each resource section also provides a discussion of the potential environmental impacts (both direct and indirect) and identifies mitigation measures to reduce significant impacts, where appropriate and feasible.

In each of the resource-specific sections, the “Environmental Impacts and Mitigation Measures” subsection identifies the thresholds used to determine the level of significance of the environmental impacts for each resource topic, in accordance with State CEQA Guidelines Sections 15126, 15126.2, and 15143. The thresholds of significance are based on Ventura County’s Initial Study Assessment Guidelines (ISAG) (Ventura County 2011); the checklist presented in Appendix G of the State CEQA Guidelines; best available data; and the applicable regulatory standards of the County and federal and state agencies. As described in detail for each resource analysis, deviation from the ISAG thresholds, which were established by the County to evaluate the impacts of individual projects, was sometimes necessary to appropriately consider the programmatic nature of a general plan for the entire unincorporated area, and to incorporate the 2019 revisions to the Appendix G checklist. Further, where ISAG thresholds include consideration of cumulative impacts, this aspect of the threshold is addressed in Chapter 5, “Cumulative Impacts.”

As described in Chapter 3, “Project Description,” of this draft EIR, the population of the unincorporated area of the county is projected to grow from 97,733 (2015) to 101,832 (2040), an increase of 4,099 people in unincorporated areas of the county, based on projections published by the Southern California Association of Governments in the 2020 Regional Transportation Plan and Sustainable Communities Strategy (SCAG 2017) and pursuant to direction from the County of Ventura’s Board of Supervisors. This rate of growth, 4.2 percent between 2015 and 2040, is one of the assumptions underlying the analysis in this draft EIR. The environmental analysis also considers the following factors:

- ▶ Implementation of the general plan, in and of itself, does not result in the growth of population, households, employment, or traffic. Growth occurs from a dynamic system of birth, death, immigration, emigration, and other factors that include the state of the economy and land use options.
- ▶ The 2040 General Plan provides policies and implementation programs to concentrate future growth in communities where housing, commercial uses, and employment are already concentrated rather than in more rural, less developed areas. Although the 2040 General Plan encourages urban development in these areas, it does not discourage or prohibit all new development in rural areas. The County has land use authority over most unincorporated land in the county, but lacks land use authority within incorporated cities and land owned or managed by the state or federal government, such as Los Padres National Forest (which is located in the northern portion of the county and accounts for approximately 574,000 acres, or 47 percent of the county's total land area), San Nicolas Island, Anacapa Island, as well as state parks, state universities, and tribal lands. Outside of the Los Padres National Forest, in the southern portion of the county, there are approximately 121,000 acres in the county's 10 incorporated cities (10 percent) and 528,000 acres of land in the unincorporated area (43 percent). The unincorporated area within the southern portion of plan area under the land use authority of the County is the focus of the environmental analysis in this draft EIR.
- ▶ There are existing, local regulations related to growth management and future development within the county, including the Guidelines for Orderly Development, originally adopted by the Ventura Local Agency Formation Commission in 1969 and since adopted by the County of Ventura and the cities within the county, greenbelt agreements between the County and cities, and the County's Save Open Space & Agricultural Resources (SOAR) initiative. Among other things, the Guidelines for Orderly Development encourage urban development to occur within the county to be located in Existing Communities and unincorporated urban centers, and the SOAR initiative (which is part of the General Plan) generally requires countywide voter approval of any redesignation of land with an Agricultural, Open Space, or Rural land use designation in the General Plan to a less restrictive land use designation.
- ▶ The analysis is based on buildout of the plan area, even though buildout is not anticipated to occur within the planning horizon. The evaluation of environmental impacts focuses on the potential impacts of development within unincorporated areas of the county under the general plan through 2040, which is approximately 20 years from when approval of the 2040 General Plan is expected and a reasonably foreseeable forecast period.
- ▶ Land use designation changes proposed in the 2040 General Plan refine the Existing Community and Urban land use designations of the existing General Plan based on currently adopted zoning designations; and include additions (e.g., Parks and Recreation designation), removals (e.g., the Urban land use designation is changed to an Area Designation), and name changes (e.g., State/Federal to Public). The designations of the 2040 General Plan would more clearly distinguish among allowed land uses and set forth maximum development density and intensity standards relative to the existing General Plan.
- ▶ Many 2040 General Plan policies are intended to reduce the environmental impact of future development. When considering whether physical changes may result in an environmental impact, relevant proposed policies in the 2040 General Plan are first applied.

The 2040 General Plan is a policy document, as described further in Chapter 3, “Project Description.” Implementation of the 2040 General Plan could have a variety of social, political, and environmental effects. Adverse physical impacts to the environment associated with implementation of the 2040 General Plan are the focus of this environmental analysis. Physical changes could result from subsequent development pursuant to land use designations established in the 2040 General Plan, implementation of policies and implementation programs identified in the 2040 General Plan, and offsite or indirect development that is necessitated by the 2040 General Plan (e.g., new facilities, infrastructure upgrades). For the purpose of this environmental analysis, the types of actions that could result in physical changes to the environment under the 2040 General Plan are referred to collectively as “future development.”

In assessing impacts, this draft EIR uses the following standard terminology:

- ▶ “No impact” means no change from existing conditions (no mitigation is needed).
- ▶ “Less-than-significant impact” means no substantial adverse change in the physical environment (no mitigation is needed).
- ▶ “Potentially significant impact” means an impact that might cause a substantial adverse change in the environment (mitigation is recommended because potentially significant impacts are treated as significant).
- ▶ “Significant impact” means an impact that would cause a substantial adverse change in the physical environment (mitigation is recommended).
- ▶ “Significant and unavoidable impact” means an impact that would cause a substantial adverse change in the physical environment and that cannot be avoided, even with the implementation of all feasible mitigation.

The impact discussion is organized numerically in each section (e.g., Impact 4.2-1, Impact 4.2-2, Impact 4.2-3). The discussion that follows the impact statement includes the substantial evidence supporting the impact significance conclusion, which is provided in bold type at the end of the discussion. The following subsection provides potentially feasible mitigation measures, framed as new or revised policies or implementation programs that could lessen the impact of the 2040 General Plan. Per Public Resources Code Section 21061.1, feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and technological factors. Where mitigation measures are identified, a discussion of impact significance with the implementation of these measures follows.

The analyses evaluate the effectiveness of the 2040 General Plan policies and programs in avoiding or reducing the potential impacts of 2040 General Plan implementation. The level of significance for each impact is determined by comparing the impacts of physical changes anticipated with implementation of the 2040 General Plan to the environmental setting, with a focus on how land uses may be developed under 2040 General Plan policies and implementation programs. Where an existing law, regulation, or permit specifies mandatory and prescriptive actions about how to fulfill the regulatory requirement as part of the project definition, leaving little discretion in its implementation, and these actions would avoid an impact or limit it to a less-than-significant level, the environmental protection afforded by the regulation is considered before determining impact significance.

Note that the actions and evaluation procedures described in the ISAG are not considered to constitute such binding regulation, although the ISAG are routinely relied upon by County staff during project-level environmental reviews. Where potential for significant environmental impacts was identified, mitigation measures are proposed to reduce the level of impact in the form of new or revised policies or implementation programs. For the purpose of this draft EIR, these policies and programs constitute mitigation measures pursuant to Section 15126.4 of the State CEQA Guidelines and ensure that implementation of the 2040 General Plan includes a feasible reduction in environmental impacts in accordance with CEQA. This method of incorporating mitigation measures into a proposed plan is consistent with Section 15126.4(a)(2) of the State CEQA Guidelines. The set of new and revised policies and programs that could be included in the 2040 General Plan, will be presented before the Board of Supervisors when it considers whether to certify a Final EIR and adopt the 2040 General Plan; mitigation measures eventually included in the 2040 General Plan would be identified with an “EIR” designation to track their origin. New and revised policies and programs also would be assigned a policy number or implementation program letter upon incorporation into the 2040 General Plan. Because the ultimate designation is unknown at this time, all new policies and implementation programs developed as mitigation are designated herein as “X.”

This draft EIR does not include separate analyses for individual Area Plans, although a brief discussion is provided when an environmental issue is limited primarily to one or more of the Area Plan areas, and the Area Plan includes policies or programs not included in the 2040 General Plan that address the unique resources.

4.1 AESTHETICS, SCENIC RESOURCES, AND LIGHT POLLUTION

This section evaluates the potential effects of implementing the 2040 General Plan on aesthetic resources, including impacts on scenic resources; potential to obstruct, degrade, obscure, or adversely affect the character of a scenic vista; creation of new sources of disability glare (a type of glare that ranges from causing temporary incapacity to causing damage to the eye) or discomfort glare (a type of glare that viewers find distracting and objectionable, but does not cause damage to the eye) for motorists travelling along any road of the County Regional Road Network (RRN); and creation of a new source of substantial light or glare which would adversely affect day or nighttime views. The analysis herein addresses potential impacts on the character of public views. For additional discussion of community character, refer to Section 4.11, “Land Use and Planning.”

As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments on the notice of preparation included concerns regarding impacts on State Route (SR) 150 and SR 126, conservation of open space and scenic areas, and general aesthetic impacts related to oil and gas development. These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

4.1.1 Background Report Setting Updates

REGULATORY SETTING

In addition to the information provided in Section 8.3, “Scenic Resources,” of the Background Report (Appendix B), the following information is relevant to understanding and evaluating the impacts of the 2040 General Plan on aesthetics, scenic resources and light pollution.

The County’s zoning ordinances establish the following lighting standards for a variety of uses allowed within various land use designations of the 2040 General Plan.

Non-Coastal Zoning Ordinance

- ▶ **Section 8106-8.6 - Light Fixtures:** The following regulations apply to light fixtures over two feet in height:
 - a. Maximum height of freestanding light fixture is 20 feet with a Zoning Clearance; over 20 feet up to 35 feet may be permitted with a Planning Director-approved Planned Development Permit. For commercial and industrial uses, such heights shall be specified by the principal use permit.
 - b. Such fixtures shall not be placed in side setbacks.
 - c. Lights in excess of 150 watts shall not result in direct illumination of adjacent properties.

- ▶ **Section 8107-5.5.10 Oil Development Guidelines – Lighting:** Lighting should be kept to a minimum to approximate normal nighttime light levels
- ▶ **Section 8107-31.10 - Recreational Vehicle/Mini-Storage - Noise and Lighting:** Noise and lighting shall not create a nuisance upon nor otherwise negatively impact neighboring uses. Any lighting shall be directed into the project and not toward neighboring properties.
- ▶ **Section 8107-45(k)(s) – Wireless Communication Facilities - Environmentally Sensitive Areas:** (1) No facility may be illuminated unless specifically required by the FAA or other government agency and (2) Any necessary security lighting shall be down-shielded and controlled to minimize glare or light levels directed at adjacent properties and to minimize impacts to wildlife.
- ▶ **Section 8108-5(12) - Motor Vehicle Parking Design Standards – Lighting:** Lighting shall be provided for all parking areas in compliance with Section 8106-8.6 and the following:
 - a. Parking areas that serve night-time users shall be lighted with a minimum 1 footcandle of light at ground for security.
 - b. All lights in parking areas that serve non-residential land uses, except those required for security per subsection (a) above, shall be extinguished at the end of the working day. Lights may be turned on no sooner than 1 hour before the commencement of working hours.
 - c. Light poles shall be located so as not to interfere with motor vehicle door opening, vehicular movement or accessible paths of travel. To the extent possible light poles shall be located away from existing and planned trees to reduce obstruction of light by tree canopies. Light poles shall be located outside of landscape finger planters, end row planters, and tree wells. Light poles may be located in perimeter planters and continuous planter strips between parking rows.
 - d. Any light fixtures adjacent to a residential land use or residentially zoned lot shall be arranged and shielded so that the light will not directly illuminate the lot or land use. This requirement for shielding applies to all light fixtures, including security lighting.
 - e. In order to direct light downward and minimize the amount of light spilled into the dark night sky, any new lighting fixtures installed to serve above-ground, uncovered parking areas shall be full cut-off fixtures as defined by the Illuminating Engineering Society of North America (IESNA). New lighting fixtures installed for parking area canopies or similar structures shall be recessed or flush-mounted and equipped with flat lenses.
- ▶ **Section 8109-2.1.2 – Lighting:** There shall be no illumination or glare from commercial sites onto adjacent properties or streets which may be considered either objectionable by adjacent residents or hazardous to motorists. Flashing lights are strictly prohibited
- ▶ **Section 8109-4.1(5) - Scenic Resource Protection Overlay Zone - Development Standards**
 - a. All discretionary development shall be sited and designed to:
 - (6) Minimize lighting that causes glare, illuminates adjacent properties, or is directed skyward in rural areas.

- ▶ **Section 8109-4.5.5(d)(4), (5), and (8) – Community Business District Overlay Zone, Mixed-Use Development:** Mixed-use development shall comply with the following requirements:
 - 4. Lighting. Lighting for commercial uses shall be appropriately shielded to avoid or mitigate negative impacts on the residential units.
 - 5. Site planning and building design shall be compatible with and enhance the adjacent and surrounding neighborhood in terms of scale, building design, color, exterior materials, roof styles, lighting, landscaping and signage.
 - 8. Parking. Mixed-use development projects shall comply with the parking requirements set forth in Section 8108, except that the nonresidential parking requirement may be modified pursuant to Section 8109-6.4 above.
- ▶ **Section 8109-4.7.1 – Dark Sky Overlay Zone (DKS)**
- ▶ **Section 8109-4.7.3 – Prohibited Lighting:** No outdoor luminaire prohibited by this Section 8109-4.7.3 shall be installed or replaced after November 1, 2018. In addition, the use of any existing outdoor luminaire that is prohibited by this Section 8109-4.7.3 shall be discontinued as of November 1, 2019. The following luminaires are prohibited:
 - a. Luminaires located along the perimeter of a lot, except those used for security/safety purposes that comply with all other applicable standards and requirements of Section 8109-4.7.4.
 - b. Permanently installed luminaires that blink, flash, rotate, have intermittent fading, or strobe light illumination.
- ▶ **Section 8109-4.7.4 – General Standards:** All luminaires installed or replaced after November 1, 2018 shall comply with the following standards and requirements:
 - a. Shielding and Direction of Luminaires. All outdoor luminaires shall be fully shielded, directed downward, and installed and maintained in such a manner to avoid light trespass beyond the lot line in excess of those amounts set forth in Section 8109-4.7.4(i) below. Lights at building entrances, such as porch lights and under-eave lights, may be partially shielded.
 - b. Lighting Color. The correlated color temperature of each outdoor luminaire, except those used for security lighting (see Section 8109-4.7.4(e)), shall not exceed 3,000 Kelvin.
 - c. Maximum Lumens Per Luminaire. Each outdoor luminaire, except those used for security lighting and outdoor recreational facility lighting, shall have a maximum output of 850 lumens. (See Section 8109-4.7.4(e) for standards regarding security lighting, and Section 8109-4.7.4(g) for standards regarding outdoor recreational facility lighting.)
 - d. Dark Hours. All outdoor luminaires, other than an essential luminaire, shall be turned off from 10:00 p.m., or when people are no longer present in exterior areas being illuminated, or the close of business hours, whichever is latest, until sunrise.

- e. **Security Lighting:**
 - (1) Outdoor luminaires used for security lighting shall not exceed a maximum output of 2,600 lumens per luminaire.
 - (2) Where the light output exceeds 850 lumens, motion sensors with timers programmed to turn off the light(s) no more than 10 minutes after activation must be used between 10:00 p.m. and sunrise. The foregoing does not apply to security lighting used for agricultural operations conducted on parcels within the Agricultural Exclusive (AE), Open Space (OS), and Rural Agricultural (RA) zones.
 - (3) Where security cameras are used in conjunction with security lighting, the lighting color may exceed 3,000 Kelvin but shall be the minimum necessary for effective operation of the security camera.
- f. **Parking Area Lighting:** Parking area lighting shall comply with the standards set forth in Section 8108-5.12, and is not subject to any other standard set forth in this Section 8109-4.7.4.
- g. **Outdoor Recreational Facility Lighting:**
 - (1) Outdoor recreational facility lighting may exceed 850 lumens and 3,000 Kelvin per luminaire. Lighting levels for these facilities shall not exceed those recommended in the Lighting Handbook available online by the Illuminating Engineering Society of North America (IESNA) for the class of play (Sports Class I, II, III or IV).
 - (2) In cases where fully-shielded luminaires would cause impairment to the visibility required for the intended recreational activity, partially-shielded luminaires and directional lighting methods may be utilized to reduce light pollution, glare and light trespass.
 - (3) With the exception of security lighting as specified in Section 8109-4.7.4(e), and parking area lighting as specified in Section 8108-5.12, outdoor recreational facilities shall not be illuminated between 10:00 p.m. and sunrise, except to complete a recreational event or activity that is in progress as of 10:00 p.m.
 - (4) See Section 8109-4.7.4(j) for additional lighting requirements for outdoor recreational facilities, by zone.
 - (5) The lighting system design (including lumens, Kelvin, etc.) shall be prepared by a qualifying engineer, architect or landscape architect, in conformance with this Section 8109-4.7.
 - (6) The proposed lighting design shall be consistent with the purpose of this section and minimize the effects of light on the environment and surrounding properties.
- h. **Service Station Lighting:** All luminaires mounted on or recessed into the lower surface of the service station canopies shall be fully shielded and utilize flat lenses. No additional lighting is allowed on the columns of the service station.

- **i. Allowable Light Trespass:** Outdoor lighting shall conform to the quantitative light trespass limits shown in Table 1 below, measured from the property line illuminated by the light source. The more restrictive zone will apply. For example, when a commercial zone abuts a single-family residential zone, the light trespass limit shall be 0.1 foot-candles at the property line.
- **j. Maximum Height Allowance:**
 - (1) Luminaires affixed to structures for the purpose of lighting outdoor recreational facilities (such as for equestrian arenas, batting cages, tennis courts, basketball courts, etc.) shall not be mounted higher than 15 feet above ground level. In cases where luminaires are affixed to fences, the top of the fixture shall not be higher than the height of the fence.
 - (2) Freestanding light fixtures used to light walkways, driveways, or hardscaping shall utilize luminaires that are no higher than two feet above ground level. Freestanding light fixtures used for commercial and industrial uses shall comply with subsection (j)(3) below.
 - (3) All other freestanding light fixtures shall not be higher than 20 feet above ground level, unless specifically authorized by a discretionary permit granted under this Chapter.
- **k. Night Lighting for Translucent or Transparent Enclosed Agriculture Structures:** All night lighting within translucent or transparent enclosed structures used for ongoing agriculture or agricultural operations (e.g., greenhouses for crop production) shall use the following methods to reduce sky glow, beginning at 10:00 p.m. until sunrise:
 - (1) Fully- or partially-shielded directional lighting; and
 - (2) Blackout screening for the walls and roof, preventing interior night lighting from being visible outside the structure.

► **Section 8109-4.8 – Habitat Connectivity and Wildlife Corridors Overlay Zone**

- Section 8109-4.8.2.3 – Prohibited Lighting: No *outdoor luminaire* prohibited by this Section 8109-4.8.2.3 shall be installed or replaced after May 18, 2019. In addition, the use of any *outdoor luminaire* installed as of May 18, 2019 that is prohibited by this Section 8109-4.8.2.3 shall be discontinued as of May 18, 2020. The following luminaires are prohibited:
 - A. Permanently installed *luminaires* that blink, flash, rotate, have intermittent fading, or have strobe light illumination.
 - B. *Luminaires* located along the perimeter of a lot except for *security lighting* that complies with all other applicable standards and requirements of Section 8109-4.8.2.
 - C. *Uplighting* of landscapes (e.g., trees, fountains) or for aesthetic purposes (e.g., outdoor statues, buildings) after 10:00 p.m. or after people are no longer present in exterior areas being illuminated, whichever occurs latest.

► **Section 8109-4.8.2.4(a) – Existing Lighting; Standards and Requirements**

- (1) Any *outdoor luminaire* installed prior to May 18, 2019 and use thereof that does not comply with any standard or requirement of Section 8109-4.8.2.4.b, and is not otherwise approved in conjunction with a land use and/or *structure* authorized by a discretionary permit granted pursuant to this Chapter, may remain in use until replaced, but shall comply with the following requirements as of May 18, 2020:
 - i. *Luminaires* that have adjustable mountings with the ability to be redirected shall be directed downward, to the extent feasible, to reduce *glare* and *light trespass* onto adjacent undeveloped areas; and
 - ii. Lighting shall be turned off at 10:00 p.m. or when people are no longer present in exterior areas being illuminated, whichever occurs latest, and shall remain turned off until sunrise, except for *essential luminaires* which may remain on if used to illuminate circulation areas such as walkways and driveways or building entrances, or if used for safety or *security lighting*, pursuant to the requirements of Section 8109-4.8.2.4.b(5).
- (2) Any *outdoor luminaire* installed prior to May 18, 2019 and use thereof that does not comply with any standard or requirement of this Section 8109-4.8.2 that is approved in conjunction with a land use and/or *structure* authorized by a discretionary permit granted pursuant to this Chapter may remain in use until at least May 18, 2022 subject to the applicable requirements of subsections a(1)(i) and a(1)(ii) above. Upon approval of a minor or major modification to the subject discretionary permit, all such lighting shall be required to be modified or replaced so that the lighting and use thereof conforms to the applicable standards and requirements of this Section 8109-4.8.2, with the replacement lighting to be phased in within a reasonable time period after May 18, 2022.
- b. Standards and Requirements. Except as provided in Section 8109-4.8.2.4.a regarding existing *lighting*, the following standards and requirements apply to *lighting* and use thereof subject to and not prohibited by this Section 8109-4.8.2:
 - (1) Shielding and Direction of *Luminaries* - All *outdoor lighting* shall be *fully-shielded*, directed downward, and installed and maintained in such a manner to avoid *light trespass* beyond the property line. Lights at building entrances, such as porch lights and under-eave lights, may be *partially-shielded luminaires*.
 - (2) Maximum Height of Lighting
 - i. *Luminaires* affixed to *structures* for the purposes of *outdoor recreational facility* lighting shall not be mounted higher than 15 feet above ground level. In cases where a *luminaire* is affixed to a fence, the top of the *luminaire* shall be no higher than the height of the fence.
 - ii. Freestanding light fixtures used to light walkways and driveways shall use *luminaires* that are no higher than two feet above ground level.

- iii. All other freestanding light fixtures shall not exceed 20 feet above ground level, unless authorized by a discretionary permit granted under this Chapter.
- (3) Lighting Color (Chromaticity) - The *correlated color temperature* of all *outdoor lighting* shall not exceed 3,000 Kelvin.
- (4) Maximum Lumens - All *outdoor lighting*, except that used for *security lighting*, *outdoor recreational facility* lighting, and driveway and walkway lighting, shall have a maximum output of 850 *lumens* per *luminaire*.
 - i. Driveway and walkway lighting shall have a maximum output of 100 *lumens* per *luminaire*.
 - ii. See Section 8109-4.8.2.4.b(5) for standards regarding *security lighting*.
 - iii. See Section 8109-4.8.2.4.b(7) for standards regarding *outdoor recreational facility* lighting.
- (5) Security Lighting
 - i. *Outdoor lighting* installed for *security lighting* shall have a maximum output of 2,600 *lumens* per *luminaire*. If required for proper functioning of a security camera used in conjunction with *security lighting*, the *correlated color temperature* may exceed 3,000 Kelvin. Where the light output exceeds 850 *lumens*, *security lighting* shall be operated by motion sensor or a timer switch and shall be programmed to turn off no more than 10 minutes after activation.
 - ii. Notwithstanding subsection (i) above, if *security lighting* is installed within a *surface water feature*, it shall be programmed to turn off no more than five minutes after activation.
 - iii. *Outdoor lighting* installed for *security lighting* that is used in connection with agricultural uses on lots zoned Agricultural Exclusive (AE), Open Space (OS), and Rural-Agricultural (RA) or legally authorized *oil and gas exploration and production* uses operating under a discretionary permit as of May 18, 2019 shall not be subject to the requirements for motion sensors and timers set forth in subsections (i) and (ii) above.
 - iv. *Essential luminaires* may remain on if used to illuminate circulation areas such as walkways, driveways or building entrances.
- (6) Parking Area Lighting shall comply with the standards set forth in Section 8108-5.12 and is not subject to any other standard or requirement set forth in this Section 8109-4.8.2.
- (7) Outdoor Recreational Facility Lighting
 - i. *Outdoor recreational facility* lighting may exceed an output of 850 *lumens* and 3,000 Kelvin per *luminaire*. Lighting levels for these facilities shall not exceed those levels recommended in the Lighting Handbook available online by the Illuminating Engineering Society of North America (IESNA) for the class of play (Sports Class I, II, III or IV).

- ii. In cases where *fully-shielded luminaires* would impair the visibility required for the intended recreational activity, *partially-shielded luminaires* and *directional lighting* methods may be used to reduce *light pollution*, *glare* and *light trespass*.
- iii. *Outdoor recreational facility* lighting shall not be illuminated between 10:00 p.m. and sunrise, except to complete a recreational event or activity that is in progress as of 10:00 p.m. Notwithstanding the foregoing, any *essential luminaire* and parking area lighting may be operated as part of the *outdoor recreational facility* in accordance with Section 8108-5.12.
- iv. A lighting system design and installation plan (including lamps, *lumens*, *Kelvin*, etc.) shall be prepared by a qualified engineer, architect or landscape architect, in conformance with this Section 8109-4.8.2.2.b(7), and submitted to and approved by the County prior to the issuance of the applicable permit.
- v. The lighting system design shall be consistent with the purpose of this Section 8109-4.8.2 and minimize the effects of *light pollution* on adjacent undeveloped areas within the Habitat Connectivity and Wildlife Corridors overlay zone.
- (8) Service Station Lighting – All *luminaires* mounted on or recessed into the lower surface of the service station canopy shall be *fully-shielded luminaires* and utilize flat lenses. No additional lighting is allowed on columns of the service station.
- (9) Wireless Communication Facilities - In addition to all other applicable standards for *wireless communication facilities* specified in Section 8107-45, *wireless communication facilities* (including radio and television towers) that are higher than 200 feet shall not use red-steady lights unless otherwise required by the Federal Aviation Administration (FAA). Only white strobe or red strobe lights or red flashing LED lights shall be used at night, and these should be the minimum number, minimum intensity, and minimum number of flashes per minute (i.e., longest duration between flashes/dark phase) allowable by the FAA. To the extent feasible, light flashes emanating from a single tower shall be set (synchronized) to flash simultaneously.
- (10) Night Lighting for Translucent or Transparent Enclosed Agriculture Structures – All night lighting within translucent or transparent enclosed *structures* used for ongoing agriculture or agricultural operations (e.g., greenhouses for crop production) shall use the following methods to reduce *light pollution* between 10:00 p.m. and sunrise:
 - i. Fully- or partially-shielded directional lighting; and
 - ii. Blackout screening for the walls and roof, preventing interior night lighting from being visible outside the *structure*.
- (11) Lighting for Oil and Gas Exploration and Production and Surface Mining Operations: *Outdoor lighting* utilized for *oil and gas exploration and production* and for surface mining operations may deviate from the above-stated standards and requirements and shall be specified in a lighting plan approved by the County during the discretionary permitting process for the subject facility or operation. All such lighting shall be designed and operated to minimize impacts on wildlife passage to the extent feasible.

- ▶ **Section 8110-6.4(c) - Display Structures for Pedestrian Viewing:** Such structures are allowed subject to conditions stated in a CUP or PD Permit in all commercial zones, and may include enclosed display of products sold or bulletin-type advertising stands which may or may not serve other functional purposes, such as kiosks, covers for inclement weather and the like, or they may serve as an additional structural element visually to enhance pedestrian ways or landscaped or parking areas.
 - c. Lighting - Illumination of pedestrian sign display structures such as kiosks may be by indirect or diffused light only.
- ▶ **Section 8110-6.5 - Illuminated Signs:** Signs in open space, agricultural and residential zones may have indirect or diffused illumination. Illuminated signs in nonresidential zones shall not exceed the brightness of a diffused light panel having cool white fluorescent 800 milliamperes lights spaced at least ten inches on center. Sign illumination shall not result in glare being directed toward surrounding properties.
- ▶ **Section 8110-6.7 - Freestanding Off-Site Advertising Signs:** Such signs are permitted only with the granting of a Planning Director Conditional Use Permit in accordance with Article 11, and are subject to the following regulations and standards in addition to those listed in Section 8110-5.1:

Section. 8110-6.7.6: In addition to the permit standards of Section 8111-2.1.2, the following design criteria shall be considered in the reviewing of all Conditional Use Permit applications:

- b. The number of light fixtures shall be kept to a minimum and integrated into the design of the structure.

Non-Coastal Zoning Ordinance, Article 19, Specific Standards for Area Plans - Old Town Saticoy Development Code

- ▶ **Section 8119-1.4.2(c) - Requirements for all Building Types - Building Lighting:** Lighting shall comply with the following requirements:
 - 1. Flood lamps shall be shielded so that light sources are not visible from a public right-of-way.
 - 2. Spotlights: Lighting (uplighting, downlighting) shall be aimed solely at the object to be illuminated, such as architectural features or components of a building, and outdoor artwork or signs.
 - 3. Lighting fixtures shall not obscure important architectural features of the building.
 - 4. Lighting fixtures shall minimize off-site light and glare that would be visible from the Santa Clara River.
- ▶ **Section 8119-1.6.3(b) - Requirements for all Signs - Sign Illumination:**
 - 1. Internal Light Source: If permitted, the light source shall not be visible from the ground and shall be limited to the sign area.

- 2. External Light Source: Lighting (uplighting, downlighting) shall be aimed solely at the sign to be illuminated, and shall not be visible from an off-site location.
- 3. Neon lighting is limited to window signs, and shall not flash, scintillate, move or rotate.
- 4. Apply [NCZO] Section 8106-8.6 for specifications on Light Fixtures.

Coastal Zoning Ordinance

- ▶ **Section 8177-2.1 – Standards for Coastal Commercial (CC) Zone – Lighting:** There shall be no illumination or glare from commercial sites onto adjacent properties or streets that may be considered either objectionable by adjacent residents or hazardous to motorists. Flashing lights are prohibited.
- ▶ **Section 8175-5.4.6 Camp Facility:** lighting shall be designed so as to not produce a significant amount of light and/or glare at the first offsite receptive use.
- ▶ **Section 8175-5.6.4 – Standards for Film Production Activities in all Zones:**
 - c. Noise and Lighting: Noise and lighting shall not create a nuisance upon nor otherwise negatively impact neighboring areas or ESHA as follows:
 - 2. Except as permitted with neighborhood consent (see Section 8175-5.6.5), lighting used for the illumination of film production activities (such as perimeter lighting, flood lighting, and external lighting) shall only be permitted when the light source is hooded or shielded so that no direct beams from the film production activities fall upon public streets, highways or private property not located within the film permit area(s).
 - 3. Temporary exterior night lighting is prohibited in ESHA. Within areas adjacent to ESHA, temporary exterior night lighting may be allowed if the light source is hooded or shielded so that no direct beams from the film production activities fall upon ESHA.
- ▶ **Section 8175-5.6.5(5) – Neighborhood Consent:** Exterior night lighting that extends beyond the boundaries of the film permit area(s).
- ▶ **Section 8175-5.7.8(g) – Oil Development and Operational Standards - Light Emanation:** Light emanation shall be controlled so as not to produce excessive levels of glare or abnormal light levels directed at any neighboring uses. Lighting shall be kept to a minimum to maintain normal nighttime light levels in the area, but not inhibit adequate and safe working light levels. The location of all flood lights and an outline of the illuminated area shall be shown on the landscape plan, if required, or on the requisite plot plan.
- ▶ **Section 8175-5.13.10.3(c) - Canopy Signs – Lighting:** Illumination of display structures such as kiosks shall be by indirect or diffused light only.
- ▶ **Section. 8175-5.13.10.11 - Illuminated Signs:** Sign lighting shall be designed to minimize light and glare on surrounding rights-of-way and properties in compliance with the following:

- a. Temporary illuminated traffic control signs placed on or adjacent to a street or highway (by authority of a public body or official having jurisdiction), shall comply with the U.S. Department of Labor Occupational Safety and Health Administration Manual on Uniform Traffic Control Devices.
 - b. Illuminated signs are prohibited within ESHA and their associated 100 foot buffer, except for road signs.
 - c. Illuminated signs are only permitted in the Coastal Agricultural (CA) and Coastal Commercial (CC) zone and shall have indirect or diffused illumination.
 - d. Illuminated signs shall not exceed the brightness of a diffused light panel with cool white fluorescent 800 milliamperes lights spaced at least 10 inches on center.
 - e. In no case shall an illuminated sign or lighting device be so placed or directed as to permit the beams and/or illumination therefrom to be directed or beamed upon a public street, walkway, or adjacent properties so as to cause glare or reflection that may constitute a nuisance, traffic or safety hazard.
 - f. Except for automated teller machines (ATM), no sign shall be illuminated after 11:30 pm or close of business, whichever occurs last.
- **Section 8175-5.20.3(t) – Development Standards – Wireless Communication Facilities, Lighting:** The following development standards apply to all wireless communication facilities:
- 1. Any necessary security lighting shall be down-shielded and controlled using motion sensors to minimize glare and light directed at adjacent properties or environmentally sensitive habitats.
 - 2. Other types of illumination may be permitted when required by the Federal Aviation Administration (FAA).
 - 3. Wireless communication facilities greater than 200 feet in height shall not exceed FAA standards for pilot warning and obstruction avoidance lighting.
- **Section 8176-4.12 – Lighting:** Lighting shall be provided for all parking areas in compliance with the following:
- a. Parking areas that serve night-time users shall be lighted with a minimum one foot-candle of light at ground level for security.
 - b. All lights in parking areas that serve non-residential land uses, except those required for security per subsection (a) above, shall be extinguished at the end of the working day. Lights may be turned on no sooner than one hour before the commencement of working hours.
 - c. Light poles shall be located so as not to interfere with motor vehicle door opening, vehicular movement or accessible paths of travel. Light poles shall be located away from existing and planned trees to reduce obstruction of light by tree canopies. Light poles shall be located outside of landscape finger planters, end row planters, and tree wells. Light poles may be located in perimeter planters and continuous planter strips between parking rows.

- d. Any light fixtures adjacent to a residential land use, a residentially zoned lot, agricultural or open space lots, or an environmentally sensitive habitat area, shall be arranged and shielded so that the light will not directly illuminate the adjacent lot or land use. This requirement for shielding applies to all light fixtures, including security lighting.
 - e. In order to direct light downward and minimize the amount of light spilled into the dark night sky, any new lighting fixtures installed to serve above-ground, uncovered parking areas shall be full cut-off fixtures. New lighting fixtures installed for parking area canopies or similar structures shall be recessed or flush-mounted and equipped with flat lenses.
- ▶ **Section 8176-5(5) - Bicycle Parking Design Standards – Lighting:** Lighting of not less than one foot-candle of illumination at ground level shall be provided in both interior and exterior bicycle parking facilities during hours of use.
- ▶ **Section 8176-9.5(c) –PEV Charging Station Design Standards - Lighting**
- 1. In no case, shall direct light from a PEV charging station illuminate a public street, walkway, or adjacent property in a manner that causes a nuisance, traffic hazard or safety hazard.
 - 2. Illuminated PEV charging stations are prohibited within 100 feet of environmentally sensitive habitat areas.

ENVIRONMENTAL SETTING

The Background Report (Appendix B) accurately describes the environmental setting for the purpose of this evaluation. Refer to Section 8.3, “Scenic Resources.” There is no additional information necessary to understand the potential aesthetic impacts of the 2040 General Plan.

4.1.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

This program-level analysis of aesthetic impacts is based on review of the proposed land use diagram of the 2040 General Plan. The land use diagram was evaluated to identify where future development under the 2040 General Plan could occur in relation to the distribution of existing aesthetic resources as described in Section 8.3, “Scenic Resources,” of the Background Report (Appendix B). Figure 8-7, Scenic Resource Areas, in the Background Report (Appendix B) and applicable Area Plan scenic resource policies also were used to identify existing scenic resources in the plan area. Specifically, the analysis evaluates whether the future development and other physical changes that could occur under the 2040 General Plan would physically alter existing scenic resources, including scenic resources along designated scenic highways, or would obstruct, degrade, or obscure scenic vistas. The analysis also considers how future development and other physical changes that could occur under the 2040 General Plan would result in light and glare impacts by considering existing sources of light and glare, such as existing communities, and the potential for future development that could occur under the 2040 General Plan to result in new sources of substantial light or glare.

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on the County’s adopted ISAG, which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project’s impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, references to cumulative impacts included in ISAG Section 6 Thresholds 1b and 1c are not included here but are addressed in Chapter 5, “Cumulative Impacts,” of this draft EIR. Appendix G question I(d) regarding day and nighttime lighting was added because nighttime lighting impacts are not addressed in ISAG.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant aesthetic impact if it would:

- ▶ Physically alter a scenic resource (defined as aesthetically pleasing natural physical features) that is visible from a public viewing location (defined as any physical area accessible to the public and from which a scenic resource is visible);
- ▶ Substantially obstruct, degrade, obscure, or adversely affect the character of a scenic vista (defined as a viewshed that includes scenic resources) that is visible from a public viewing location (defined as any physical area accessible to the public and from which a scenic resource is visible);
- ▶ Create a new source of disability glare (a type of glare that ranges from causing temporary incapacity to causing damage to the eye) or discomfort glare (a type of glare that viewers find distracting and objectionable, but does not cause damage to the eye) for motorists traveling along any road of the County Regional Road Network; or
- ▶ Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to aesthetics and, specifically, the thresholds of significance identified above, include the following:

Conservation and Open Space Element

- ▶ **Policy COS-3.1: Scenic Roadways.** The County shall protect the visual character of scenic resources visible from State or County designated scenic roadways. (RDR) [*Source: Existing GPP Goal 1.7.1.2, modified*]

- ▶ **Policy COS-3.2: Tree Canopy.** The County shall encourage the planting of trees and the protection of existing urban forests and native woodlands, savannahs, and tree canopy throughout the county, including along State or County designated scenic roadways and in residential and commercial zones throughout the county, especially those located within designated disadvantaged communities. (MPSP, RDR) *[Source: New Policy]*
- ▶ **Policy COS-3.3: Utility Undergrounding Priority.** The County shall give overhead utility undergrounding within high fire hazard areas and Scenic Resource Areas first priority when allocating County Utility Undergrounding Funds. (MPSP, FB) *[Source: Existing GPP Policy 1.7.2.3, modified]*
- ▶ **Policy COS-3.4: Visual Impacts from Reservoirs.** The County shall ensure that reservoirs are not sited on prominent ridgelines and that new reservoirs are well-screened with native vegetation and berms and, if possible, are undergrounded. (RDR) *[Source: Existing Lake Sherwood/Hidden Valley Area Plan Policy 2.5.2.3, Oak Park Area Plan Policy 1.4.2.3, and Thousand Oaks Area Plan Policy 1.4.2.7, modified]*
- ▶ **Policy COS-3.5: Ridgeline and Hilltop Preservation.** The County shall ensure that ridgelines and major hilltops remain undeveloped and that discretionary development is sited and designed to remain below significant ridgelines, except as required for communication or similar facilities. (RDR) *[Source: Ojai Valley Area Plan Goal 1.6.1.3, modified]*
- ▶ **Policy COS-3.6: Open Space Character.** The County shall require discretionary development outside of Existing Communities be planned and designed to maintain the scenic open space character of the surrounding area, including view corridors from highways. Discretionary development should integrate design, construction, and maintenance techniques that minimize the visibility of structures from public viewing locations within scenic vistas. (RDR) *[Source: New Policy]*

Implementation Programs

- ▶ **Implementation Program J: Scenic Highway Designations.** The County shall seek official State Scenic Highway designations for County designated Scenic Highways. *[Source: Existing GPP Program 1.7.3.2, modified]*

Land Use Element

- ▶ **Policy LU-9.5: Recreational Areas Appropriate for the Open Space Land Use Designation.** The County shall designate areas appropriate for recreational activities as Open Space, including, but not limited to, use and enjoyment of recreational trails and areas for hunting and fishing. Preservation of open space also serves to protect areas of outstanding scenic, historic, and cultural value; areas particularly suited for park and recreation purposes, including access to lakeshores, beaches, and rivers and streams; and areas which serve as links between major recreation and open space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors. (MPSP) *[Source: Existing GPP Policy 3.2.2.5-3, SOAR, modified]*
- ▶ **Policy LU-11.3: Design.** The County shall require new commercial and industrial developments to be designed to be generally compact, grouped and consolidated into functional units providing for sufficient off-street parking and loading facilities, maximize pedestrian and vehicle safety, reduce vehicle miles traveled (VMT), encourage electric

vehicle charging, and minimize the land use conflicts and traffic congestion. The County shall require that commercial and industrial discretionary development is designed to provide adequate buffering (e.g., walls, landscaping, setbacks) and operational conditions (e.g., hours of operation, and scheduling of deliveries) to minimize adverse impacts (e.g., noise, glare, and odors) on adjoining and adjacent residential areas. (RDR) *[Source: Existing GPP Policies 3.4.2.3 and 3.4.2.4, modified]*.

- ▶ **Policy LU-16.1: Community Character and Quality of Life.** The County shall encourage discretionary development to be designed to maintain the distinctive character of unincorporated communities, to ensure adequate provision of public facilities and services, and to be compatible with neighboring uses. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-16.8: Residential Design that Complements the Natural Environment.** The County shall encourage discretionary development that incorporates design features that provide a harmonious relationship between adjoining uses and the natural environment. (RDR) *[Source: Existing Lake Sherwood/Hidden Valley Area Plan Policy 1.1.2.5, Oak Park Area Plan Policy 3.3.2.3, modified]*
- ▶ **Policy LU-16.9: Building Orientation and Landscaping.** The County shall encourage discretionary development to be oriented and landscaped to enhance natural lighting, solar access, and passive heating or cooling opportunities to maximize energy efficiency. (RDR) *[Source: Existing GPP Policy 1.9.2.5, modified]*
- ▶ **Policy LU-16.10: Visual Access for Rural Development.** The County shall encourage discretionary development in rural areas to maintain views of hillsides, beaches, forests, creeks, and other distinctive natural areas through building orientation, height, and bulk. (RDR) *[Source: New Policy]*

El Rio/Del Norte Area Plan

- ▶ **Policy ED-34.1: Discretionary Development Adjacent to Highways and Major Roadways.** The County shall subject discretionary development on parcels adjacent to U.S. 101, Ventura Boulevard, Highway 118, State Route 232, Rose Avenue, Santa Clara Avenue and Central Avenue (within the El Rio/Del Norte Area Plan boundary) to the following development standards:
 - a. A sign program shall be submitted concurrently with a discretionary permit application for all commercial and industrial development. Freestanding off-site advertising signs shall be prohibited. All on-site freestanding signs shall be limited to five feet in height.
 - b. Outside open storage shall be landscaped and/or screened from public view to the maximum extent feasible.
 - c. The architectural design and building material of development shall be designed to enhance the visual quality of the surrounding areas.
[Source: Existing El Rio/Del Norte Policy 1.5.2.1]

Lake Sherwood/Hidden Valley Area Plan

- ▶ **Policy LS-9.2: Minimize Impacts to Natural Scenic Topographical Features.** The County shall require discretionary development/grading to be designed as much as practicable to minimize the alteration or degradation of natural scenic topographical

features (such as ridgelines, natural slopes, rock outcroppings). The reshaping of the natural terrain to permit access and construction shall be kept to the absolute minimum. Where possible, grading shall employ landform grading techniques to emulate natural landforms and shall comply with the following:

- a. Transition Design: The angle of the graded slope shall be gradually adjusted to the angle of the natural terrain.
- b. Angular Forms: Angular forms shall generally not be permitted. The graded form shall reflect the natural rounded terrain, unless exposed rock faces can be used as a desirable visual element.
- c. Exposed Slopes: Graded slopes shall be concealed by landscaping, berms or other measures wherever possible.
- d. The toe and crest of all cut and fill slopes in excess of five (5) feet vertical height shall be rounded.
- e. Long, uniform slopes with severe grade breaks, which result in an unnatural, manmade appearance, shall be avoided. Where cut or fill slopes exceed 100 feet in horizontal length, the horizontal contours of the slope shall be curved in a continuous, undulating fashion so as to emulate natural slopes.
- f. Where cut and fill slopes in excess of five feet are created, detailed landscape and irrigation plans shall be submitted to and approved by the Planning Division and Public Works Agency prior to the issuance of any grading conditional use permit or building permit. The plans will be reviewed for type and density of ground cover, seed-mix, hydromulch mix, plant sizes and irrigation systems.

[Source: Existing Lake Sherwood/Hidden Valley Policy 2.5.2.4]

North Ventura Avenue Area Plan

- **Policy NV-1.12: Scenic Features.** The State and the County of Ventura recognizes Highway 33 as eligible for official designation as a State adopted scenic highway. The highway can be officially designated as a scenic thoroughfare when the City [of Ventura] develops a corridor protection program (e.g., building height limitations, requiring landscape screening of unaesthetic land uses, limiting signs and outdoor advertising, etc.).

Currently, the area where Highway 33 enters the City (Ventura Avenue and Shell Road), is designated as a scenic approach. Given that the City boundary will ultimately be located at the northerly boundary of the community, (Ventura Avenue and Canada Larga Road), the designation should be moved to that area. *[Source: Existing North Ventura Avenue II.A.2.f]*

- **Policy NV-1.13: Scenic Approach.** A “Scenic Approach” is established in the area of Ventura Avenue and Canada Larga Road. The purpose of this designation would be the protection of aesthetic views of the surrounding area that could include topography, vegetation, panoramas, natural and manmade features. Through discretionary permit conditions, view protection measures should consist of preventing obstruction of views by means of landscaping grade differences or fences, limiting signs and outdoor advertising, and the undergrounding of utility lines. (Scenic Highway considerations area also reflected on the City’s “Scenic Highways Element” [Appendix H]). *[Source: Existing North Ventura Avenue III.B.10]*

Oak Park Area Plan

- ▶ **Policy OP-48.1: Public Views of Natural Ridgelines.** The County shall prohibit discretionary development and grading which will significantly obscure or degrade public views of the natural ridgelines. *[Source: Existing Oak Park Policy 1.4.2.1]*
- ▶ **Policy OP-49.1: Exterior Lighting.** The County shall require all exterior lighting shall to be unobtrusive and constructed or located so that only the intended area is illuminated, long range visibility is reduced, and off-site glare is fully controlled. *[Source: Existing Oak Park Policy 3.4.2.4]*

Thousand Oak Area Plan

- ▶ **Policy TO-41.1: Public Views of Natural Ridgelines.** The County shall prohibit discretionary development which will significantly obscure or alter public views of the natural ridgelines. *[Source: Existing Thousand Oaks Policy 1.4.2.1]*
- ▶ **Policy TO-41.2: Requirements for Projects in the Thousand Oaks Area of Interest zoned SRP.** The following requirements shall apply to all properties in the Thousand Oaks Area of Interest which are zoned SRP (Scenic Resource Protection Overlay Zone):

(1) The County shall require all discretionary grading to be in accordance with the Grading and Hillside Development Standards (see Special Guidelines and Standards).

(2) The County shall require removal, damaging or destruction of protected trees to be required to comply with the provisions of the County's Tree Protection Regulations (see Non-Coastal Zoning Ordinance), Tree Protection Guidelines and the Guidelines for the Preservation and Protection of Trees (see Special Guidelines and Standards).

(3) The County shall prohibit freestanding off-site advertising signs.

(4) The County shall require any required landscaping to utilize species native to the area where feasible.

(5) No discretionary development shall be approved which would significantly degrade or destroy a scenic view or vista.

[Source: Existing Thousand Oaks Policy 1.4.2.2]

- ▶ **Policy TO-41.3 Development Abutting Scenic Roadways.** The County shall subject discretionary development on parcels abutting an adopted or eligible County Scenic Highway or Local Scenic Road (see "Scenic Roadways") shall be subject to the following criteria:

(1) The County shall prohibit freestanding off-site advertising signs and pole-mounted business identification or advertising signs.

(2) The County shall prohibit outside storage in public. The County shall require storage areas to be landscaped and/or screened from public view.

(3) The County shall require existing healthy, mature trees, and native and long established vegetation to be retained, where feasible.

(4) The County shall require development to be designed to be in harmony with the surrounding areas.

[Source: Existing Thousand Oaks Policy 1.4.2.3]

Ojai Valley Area Plan

- ▶ **Policy OJ-41.1: Scenic Views and Vistas from Public Roads or Publicly-owned Land.** The County shall prohibit discretionary development/grading which will significantly degrade or destroy a scenic view or vista from public roads or publicly-owned land, unless the development/grading is a public project, or a private project for which there is a substantial public benefit, and overriding considerations are adopted by the decision-making body. *[Source: Existing Ojai Valley Policy 1.6.2.1]*
- ▶ **Policy OJ-41.2: Minimize Impacts to Natural Terrain.** The County shall require as a result of any discretionary development, the reshaping of the natural terrain to permit access and construction to be kept to the absolute minimum. Where possible, improvements shall be designed to conform to the terrain rather than the reverse and shall comply with the following:
 - a. Transition Design: The County shall require the angle of the graded slope to be gradually adjusted to the angle of the natural terrain.
 - b. Angular Forms: The County shall generally not permit angular forms. The County shall require the graded form to reflect the natural rounded terrain, unless exposed rock faces can be used as a desirable visual element.
 - c. Exposed Slopes: The County shall require graded slopes to be concealed by landscaping, berms or other measures.
 - d. The County shall require the toe and crest of all cut and fill slopes in excess of five feet vertical height to be rounded with vertical curves.
 - e. Where cut or fill slopes exceed 100 feet in horizontal length, the County shall require the horizontal contours of the slope to be curved in a continuous, undulating fashion in conformance with natural slopes.
 - f. Where cut and fill slopes in excess of five feet in height are created, the County shall require detailed landscape and irrigation plans to be submitted to and approved by the Planning Division and Public Works Agency to the issuance of any grading permit, conditional use permit or building permit. The plan will be reviewed for type and density of ground cover, seed-mix, hydromulch mix, plant sizes and irrigation systems.
[Source: Existing Ojai Valley Policy 1.6.2.5]
- ▶ **Policy-OJ-41.3: Prominent Ridgelines Protection.** The County shall require the area within 400 feet (horizontal) of prominent ridgelines as shown in Figure OJ-3 [of the Ojai Area Plan] to be zoned “Scenic Resource Protection Overlay” in order to ensure that visual impacts of grading and attendant structures are minimized to the maximum extent feasible. The County shall require discretionary development to be located and designed to minimize visibility and silhouetting against the skyline as viewed from nearby public roads, and to incorporate as many of the following planning techniques as feasible:

- a. Limit construction to single-story structures on or near ridgelines;
- b. Utilize large building pad setbacks (50 feet or more) from the edge of a ridgeline;
- c. Utilize berms and landscaping to soften the visual impact of homes and graded areas;
- d. Utilize raised foundations, split-level designs, roof materials consisting of clay or concrete plate tile with a natural color, and other techniques to fit the home to the hillside terrain, and to minimize the amount of grading required.

[Source: Existing Ojai Valley Policy 1.6.2.2]

Piru Area Plan

- ▶ **Policy P-42.1: Public Views of Natural Ridgelines.** The County shall prohibit discretionary permits involving excessive and unsightly terracing, grading of hillsides, and development which will obscure or alter public views of the natural ridgelines. *[Source: Existing Piru Policy 1.3.2.1]*
- ▶ **Policy P-43.2: Local Scenic Roads.** The County shall designated State Highway 126, Main Street, Center Street, Piru Canyon Road, Guiberson Road, and Torrey Road, as Local Scenic Roads (Figure P-22 [of the Piru Area Plan]). The County shall require discretionary permits located within view of a Local Scenic Road to be reviewed for compliance with the following criteria:
 - a. The County shall require a sign program to be submitted concurrently with a discretionary permit for all commercial and industrial development. Freestanding off-site advertising signs shall be prohibited. All on-site freestanding signs shall be limited to five feet in height.
 - c. The County shall require outside storage to be landscaped and/or screened from public view.
 - c. The County shall require existing healthy, mature trees to be retained, where feasible.
 - d. The County shall require discretionary development to be designed consistent with the Piru Community Design Guidelines (see Appendix).
[Source: Existing Piru Policy 1.3.2.4]
- ▶ **Policy P-43.3: Scenic Resource Protection Zone.** The County shall continue to designate the viewshed to the highest ridgeline surrounding Lake Piru as a Scenic Resource Protection Zone. Within this viewshed, the following requirements shall apply:
 - a. The County shall require any request for significant grading to be evaluated through the discretionary permit process.
 - b. The County shall require removal, damaging, or destruction of protected trees to be in compliance with the County's Tree Protection Regulations.
 - c. The County shall prohibit discretionary development which would significantly degrade or destroy a scenic view or vista.
 - d. The County shall prohibit freestanding off-site advertising signs.
[Source: Existing Piru Policy 1.3.2.5]

- ▶ **Policy P-43.5: Landscaped Setbacks along Highway 126.** The County shall condition discretionary residential development along Highway 126 to provide a landscaped setback along the highway, which may be combined with a stormwater detention basin, sound attenuating berm and/or other features designed to screen and soften public views of the development and reduce noise impacts to residents. *[Source: Existing Piru Policy 1.3.2.6]*

Saticoy Area Plan

- ▶ **Policy RES-4.1:** Landscape buffers or other appropriate visual screening shall be required for all discretionary industrial development that borders SR 118, the Santa Clara River, the Brown Barranca, or the Franklin Barranca. When customary visual screening techniques, such as those listed in Policy RES 4.2 (below), fail to provide full visual screening for industrial properties visible from the Santa Clara River Bridge due to grade differences, the Planning Director may modify visual screening requirements to address grade differences.
- ▶ **Policy RES-4.1:** When open storage on commercial or industrial properties is visible from public streets or parks within Old Town Saticoy, such areas shall be screened from public view by the use of enclosed structures, fences, walls, vegetated berms or landscaping.
- ▶ **Policy RES-4.3:** Lighting for discretionary development shall be designed to avoid off-site glare, including glare that may impact drivers along SR 118.

Coastal Area Plan

- ▶ **Section 30251: Scenic and Visual Qualities.** The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.1-1: Physically Alter a Scenic Resource that is Visible from a Public Viewing Location

As discussed in Section 4.1.1, above, a scenic resource is defined as aesthetically pleasing natural physical features that is visible from a public viewing location. A public viewing location is defined as any physical area accessible to the public and from which a scenic resource is visible (Ventura County 2011). As discussed in Section 8.3, "Scenic Resources," of the Background Report (Appendix B), many scenic areas and natural features exist throughout the county, including valleys and mountain ranges and the Channel Islands. The County has developed a Scenic Resource Protection Overlay Zone to protect scenic resources throughout the county. As shown in Figure 8-7 of the Background Report, the Scenic Resource Protection Overlay Zone of the Non-Coastal Zoning Ordinance (NCZO) includes all scenic areas designated by the County surrounding Lake Casitas, Lake Matilija, Lake Piru, and Lake Sherwood; ridgelines surrounding the city of Ojai; and 40 miles of SR 33 that wind through the coastal mountain range from Pine Mountain Summit to the northwestern boundary of the County with the County of Santa Barbara, which are designated as a State scenic highway by the California Scenic Highway Program.

Portions of Hidden Valley, which is located in the Santa Monica Mountains and along the southwestern border of Simi Valley and southern border of Thousand Oaks, to the north of the border with Los Angeles County, are also part of the Scenic Resource Protection Overlay Zone. In addition to scenic resources identified in the Scenic Resource Protection Overlay Zone and 2040 General Plan, other scenic resources within the county are identified in the following Area Plans:

Lake Sherwood/Hidden Valley Area Plan – includes views surrounding Lake Sherwood and the Santa Monica Mountains. Land use designations under the 2040 General Plan within the Lake Sherwood Scenic Resource Protection Overlay Zone would include Open Space, Residential Planned Development, Very Low Residential, and ECU- Rural. Similarly, within Hidden Valley, the majority of the land designated as Scenic Resource Protection Overlay Zone would be designated as Open Space, while a few areas would be designated as Very Low Density Residential.

Ojai Valley Area Plan - includes a Scenic Resource Protection Overlay Zone that includes lands located in the western part of the county, bordering Santa Barbara County to the west. This zone includes ridgelines to the north of Ojai, which are also part of the County's Scenic Resource Protection Overlay Zone.

Piru Area Plan - designates six roadways as Local Scenic Roads and the viewshed to the highest ridgeline surrounding Lake Piru as a Scenic Resource Protection Zone.

Thousand Oaks Area Plan - identifies the area west of the Oak Park Plan area and north of the Santa Monica Mountains as a scenic resource. This area contains one eligible scenic highway under the California Scenic Highway Program (U.S. Highway 101) and three local scenic highways, including U.S. 101, State Route 23, and Potrero Road.

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. If placed within or in the vicinity of scenic resources areas, as visible from public viewing locations, development that would occur as a result of implementation of the 2040 General Plan could result in alterations of these scenic resources. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

The 2040 General Plan includes policies that would protect scenic resources visible from public viewing locations throughout the county from physical alteration. Policy COS-3.5 requires the County to site and design discretionary development below significant ridgelines (except as required for communication or similar facilities) and ensure that ridgelines and major hilltops remain undeveloped. Through Policy COS-3.6 the County would require that discretionary development outside of Existing Community area designations maintain the scenic open space character of its surroundings and incorporate construction and design techniques to minimize the visibility of structures from public viewing locations within scenic vistas. Policy COS-3.1 requires the protection of the visual character of scenic resources visible from State or County designated scenic roadways. Policy COS-3.4 would limit potential alteration of scenic resources by requiring that reservoirs not be sited on prominent ridgelines. Policy LU-9.5, explains that one of the purposes of the Open Space land use designation is to protect outstanding scenic resources and scenic highway corridors. These policies would encourage discretionary development that maintains community character (Policy LU-16.1) and harmony with adjoining uses and the natural environment (Policy LU-16.8). Area Plans also incorporate policies and implementation programs to protect scenic resources, as described below.

As outlined in the County's Coastal Area Plan, the County's Coastal Zone contains scenic resources. Per Section 30251 of the Coastal Area Plan, future development along the coast shall be sited to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of the surrounding area and, where feasible, to restore and enhance visual quality in visually degraded areas. Further, the Coastal Area Plan protects highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government by requiring that future development shall be subordinate to the character of its setting.

The El Rio/Del Norte Area Plan incorporates policies that protect the viewshed from U.S. 101, Highway 118, State Route 232, Rose Avenue, Santa Clara Avenue, and Central Avenue. These policies include architectural design and building material standards.

The Ojai Valley Area Plan has standards for all development within the Scenic Resource Protection Overlay Zone, such as limits on the height of these buildings, landscaping requirements, and setbacks from ridgelines.

The Piru Area Plan incorporates Policy P-42, which restricts discretionary permits that involve excessive and unsightly terracing, grading of hillsides and development which will obscure or alter public views of the natural ridgelines. The Piru Area Plan also incorporates Policy P-43.3, which requires additional review for projects located within a Scenic Resource Protection Zone.

The Saticoy Area Plan requires landscape buffers or appropriate screening for all industrial development that borders SR 118, the Santa Clara River, the Brown and Franklin Barrancas, and public roads or parks within Old Town Saticoy, located to the southeast of the City of Ventura.

The Thousand Oaks Area Plan incorporates development criteria for all development located within areas that are within the Scenic Resource Protection Overlay Zone and abut an adopted or eligible scenic highway. Both the Thousand Oaks Area Plan and the Lake Sherwood/Hidden Valley Area Plan include policies that restrict all development that would significantly obscure or alter public views of natural ridgelines.

Many of the resources identified in these Area Plans, such as Lake Sherwood, are also located within the Scenic Resource Protection Overlay Zone which, as discussed above, provides regulations for protection of scenic resources. Section 8109-4.1.5 of the NCZO requires that discretionary development within the Scenic Resource Protection Overlay Zone to be sited and designed to prevent significant degradation of a scenic view or vista and minimize any alteration of the natural topography, physical features, and vegetation. Because of its policies, including Area Plan policies, and the NCZO requirements, future development under the 2040 General Plan would not result in physical alternation of scenic resources within the Scenic Resource Protection Overlay Zone.

The county also includes scenic areas and features that are not officially designated as scenic resources. These areas include natural landscapes such as coastal plains and valleys present throughout the county; the Western Transverse Ranges, which include the Santa Monica Mountains, Santa Susana Mountains, and Simi Hills; the Cuyama Badlands, located in the northwestern portion of the county; and Anacapa and San Nicolas Islands, two of the eight Channel Islands located within the county. Future development under the 2040 General Plan could occur within or in the vicinity of these areas. As described above, through Policies COS-3.1, COS-3.5, and COS-3.6 the County would require that future development throughout the county avoid ridgelines and major hilltops, protect the visual character of scenic resources visible from designated scenic roadways, maintain existing scenic open space character of surrounding areas, and use construction and design techniques to minimize visibility of structures from public viewing locations within scenic vistas. Future development within the Scenic Resource Protection Overlay Zone would be required to comply with Section 8109-4.1.5 of the NCZO, described above. Together the NCZO regulations for the Scenic Resource Protection Overlay Zone and 2040 General Plan policies would require future development to not result in physical alteration of scenic resources. In addition, as required by Section 8107-5.5.3, new discretionary oil drill sites and production facilities shall be sited so they are not readily seen. Lastly, through Implementation Program J in the Conservation and Open Space Element the County would work to include locally-designated scenic highways in the State scenic highway system, which would increase the protection of scenic resources visible from scenic highways.

Scenic resources visible from public viewing locations located throughout the county would be protected from physical alteration by the proposed land use diagram, which protects scenic resource areas with the open space designation and accommodates higher intensity development within the Existing Community and Urban area designations, 2040 General Plan, including Area Plan, policies and programs that govern the design and location of future development, and the Scenic Resource Protection Overlay Zone requirements of the NCZO. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.1-2: Substantially Obstruct, Degrade, Obscure, or Adversely Affect the Character of a Scenic Vista that is Visible from a Public Viewing Location

As discussed in Section 4.1.1, above, the County's ISAG define a scenic vista as a viewshed that includes scenic resources that are visible from a public viewing location, defined as any physical area accessible to the public and from which a scenic resource is visible (Ventura County 2011). As described under Impact 4.1-1 and shown in Figure 8-7 of the Background Report (Appendix B), the Scenic Resource Protection Overlay Zone includes areas surrounding Lake Casitas, Lake Matilija, Lake Piru, and Lake Sherwood; areas along SR 33, to the north of Ojai; and portions of Hidden Valley, which are within the Santa Monica Mountains and located along the southern border of Thousand Oaks. Future development expected to occur as a result of implementation of the 2040 General Plan is described under Impact 4.1-1, above. For this analysis, a significant impact would occur if future development under the 2040 General Plan would obstruct views of these resources from public viewing locations. Public viewing locations which afford views of these areas can include public roads, parks, trails, bike paths, lakes, and beaches (Ventura County 2011). One of the county's distinguishing characteristics is its open space and scenic character. As described in Section 2.1, "Growth Management," of the 2040 General Plan, the County is dedicated to directing urban development into existing unincorporated communities to preserve views of scenic resources.

As discussed in Impact 4.1-1, land use designations where scenic resources are present would largely include Open Space and Agricultural with relatively minimal land area designated as Residential Planned Development, Very Low Residential, and Rural.

In addition to scenic resources identified in the Scenic Resource Protection Overlay Zone, scenic resource areas are identified in Area Plans as described in Impact 4.1-1. As also discussed above for Impact 4.1-1, these scenic viewsheds would be protected by requirements outlined in these Area Plans. For instance, both the Thousand Oaks Area Plan and the Lake Sherwood/Hidden Valley Area Plan restrict all development that would significantly obscure or alter public views of the natural ridgelines. Policy COS-3.5 requires the County to site and design discretionary development below significant ridgelines (except as required for communication or similar facilities) and ensure that ridgelines and major hilltops remain undeveloped. Through Policy COS-3.6 the County would require that discretionary development outside of Existing Community area designations maintain the scenic open space character of its surroundings and incorporate construction and design techniques to minimize the visibility of structures from public viewing locations within scenic vistas. Policy COS-3.1 requires the protection of the visual character of scenic resources visible from State or County designated scenic roadways. Policy COS-3.4 would limit potential alteration of scenic resources by requiring that reservoirs not be sited on prominent ridgelines.

Policy LU-9.5 explains that one of the purposes of the Open Space land use designation is to protect outstanding scenic resources and scenic highway corridors. These policies would encourage discretionary development that maintains community character (Policy LU-16.1) and harmony with adjoining uses and the natural environment (Policy LU-16.8). Policy LU-16.10 would encourage development in rural areas to maintain views of hillsides, beaches, forests, creeks, and other distinctive natural areas through building orientation, height, and bulk.

Further, as discussed in Impact 4.1-1, SR 33, an area extending from Wheeler Springs (an unincorporated community in the county) to the border with Santa Barbara County is designated as a State scenic highway by the California Scenic Highway Program. A number of other highways are also designated as eligible scenic highways by the program, including the remainder of SR 33, extending from Wheeler Springs south to the City of Ojai, as well as sections of SR 1, U.S. Highway 101, SR 150, SR 126, and SR 118. Through Policy COS-3.1, the County would protect the character of visual resources visible from State or County-designated scenic roadways, including SR 33. As discussed in Impact 4.1-1, because land surrounding SR 33 would be designated as Open Space under the 2040 General Plan, allowable development intensity this area would be low. Although there could be future development along SR 33, because of the Open Space land use designations, and through compliance with Section 8109-4.1.5 of the NCZO, which requires that all discretionary development within the Scenic Resource Protection Overlay Zone to be sited and designed to prevent significant degradation of a scenic view or vista, and the above described policies of the 2040 General Plan including Area Plans that protect existing scenic character and views, future development would not be anticipated to obstruct, degrade, or obscure a scenic vista. Land in the vicinity of other eligible scenic highways would largely be designated Agricultural, Rural, Open Space, or Very Low Density Residential. The Agricultural land use designation under the 2040 General Plan would allow for development of one dwelling unit per parcel, the Rural land use designation would allow for one dwelling unit per 2 acres, and the Very Low Density Residential land use designation would allow for four dwelling units per acre. For these reasons, development within eligible scenic highways would be limited.

Development in all areas where there are scenic resources (including Scenic Resource Protection Overlay Zones and areas known to have other scenic resources) would be subject to various existing regulations governing the protection of scenic vistas, including the policies and programs of the 2040 General Plan, including Area Plans, and the provisions of the Scenic Resource Protection Overlay Zone. Therefore, future development under the 2040 General Plan would not obstruct, degrade, obscure, or adversely affect the character of a scenic vista that is visible from a public viewing location, or adversely affect visual character. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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

The County's ISAG define disability glare as a type of glare that ranges from causing temporary incapacity to causing damage to the eye and discomfort glare as a type of glare that viewers find distracting and objectionable, but does not cause damage to the eye (Ventura County 2011).

The County RRN is defined in the 2040 General Plan glossary as the road system in the county that consists of roads classified as Primary (6 lanes or more), Secondary (4 lanes) or Collector (2 lanes), as well as freeways, expressways and conventional State highways. Roadways identified in the RRN are depicted in Figure 6-1 of the Background Report (Appendix B). As shown in this figure, the RRN incorporates freeways, expressways, highways, and thoroughfares within the developed portion of the county (primarily in the southern portion of the county) but also includes SR 33, which extends north from Wheeler Springs to the border with Santa Barbara County.

Future development expected to occur as a result of implementation of the 2040 General Plan is described under Impact 4.1-1, above. Under the 2040 General Plan land use designations in the vicinity of RRN roadways would largely consist of Open Space or Agricultural. However, a few areas along SR 33, south and southeast of Ojai, would be designated as Rural, Very Low Density Residential, Residential Planned Development, Low Density Residential, and limited Medium Density Residential. Further, limited areas located adjacent to some RRN roadways, including the southern portion of SR 33, U.S. Highway 101, SR 126, and SR 118, would be designated as Industrial.

The majority of the areas adjacent to the RRN roadways are designated as Open Space or Agricultural. The Open Space land use designation would allow for a maximum building lot coverage of 5 percent, development of one dwelling unit per parcel, and a minimum parcel size of 10 acres. A Conditional Use Permit (CUP) is required for the development of other allowed uses within the Open Space designation including but not limited to composting operations, greenhouses greater than 20,000 square feet, correctional institutions, fire stations, and oil and gas wells. A CUP is based upon a discretionary decision required prior to initiation of particular uses not allowed as a matter of right and may be denied on the grounds of unsuitable location or may be conditioned in order to be approved. The Agriculture land use designation would allow for a maximum building lot coverage of five percent, development of one dwelling unit per parcel and a minimum parcel size of 40 acres. A CUP is required for the development of other allowed uses within the Agricultural designation including but not limited to other uses that could include greenhouses greater than 20,000 square feet, principal and accessory structures related to agriculture, oil and gas wells, and composting operations.

Both land use designations would allow for the development of an Accessory Dwelling Unit on the subject parcel. Thus, development in these designations in locations visible from a RRN roadway could introduce new sources of disability and discomfort glare for motorists traveling on a RRN roadway. Policies of the 2040 General Plan would address the potential glare impacts of future development, such as Policy LU-11.3, which requires new commercial and industrial developments to, among other things, minimize adverse glare impacts on adjoining and adjacent residential areas.

The NCZO and CZO include multiple development standards that would reduce potential disability and discomfort glare impacts on motorists traveling along RRN roadways, which may be caused by future development. These ordinance sections are as follows:

- ▶ NCZO Section 8109-2.1.2 does not allow illumination or glare from commercial sites onto adjacent properties or streets that may be considered either objectionable by residents or hazardous to motorists;

- ▶ NCZO Section 8109-3.1.3 requires that industrial projects maintain glare and heat at levels appropriate for the zone or geographic area and are not objectionable at the point of measurement when the use is in normal operation;
- ▶ NCZO Section 8109-4.1(5)(a)6) requires lighting within the Scenic Resource Protection Overlay Zone that causes glare, illuminates adjacent properties, or is directed skyward in rural areas be minimized;
- ▶ NCZO Section 8109-4.8.2.4(1)(i) requires that luminaires within the Habitat Connectivity and Wildlife Corridors Overlay Zone that have adjustable mountings with the ability to be redirected shall be directed downward, to the extent feasible, to reduce glare and light trespass onto adjacent undeveloped areas;
- ▶ NCZO Section 8110-6.5 requires that signs in open space, agricultural and residential zones have indirect or diffused illumination which shall not result in glare being directed toward surrounding properties;
- ▶ NCZO Section 8119-1.4.2(c) requires that all buildings in the Saticoy Area Plan have light fixtures that minimize off-site light and glare that would be visible from the Santa Clara River;
- ▶ CZO Section 8177-2.1 does not allow illumination or glare from commercial sites onto adjacent properties or streets that may be considered either objectionable by adjacent residents or hazardous to motorists;
- ▶ CZO Section 8175-5.4.6 requires lighting at camp facilities be designed so as to not produce a significant amount of light and/or glare at the first offsite receptive use;
- ▶ CZO Section 8175-5.7.8(g) requires light emanation from oil development be controlled so as not to produce excessive levels of glare or abnormal light levels;
- ▶ CZO Section. 8175-5.13.10.11 requires that sign lighting be designed to minimize light and glare on surrounding rights-of-way and properties.

In addition to the above, where future discretionary developments propose reflective building materials such as metal or glass, and would be visible from an RRN roadway, the ISAG guidance states that either the project should use non-reflective instead of reflective materials or a consultant study would be required to determine the potential for significant glare that results in disability or discomfort glare for motorists traveling along an RRN roadway, based on ambient illumination, the angle of reflective surface(s), and viewing angle of the project from road(s) of the RRN. The ISAG further states that glare analysis of a project would be considered significant when the glare source to the median of the background ratio exceeds 3:1 in a luminance histogram.

As described above, the provisions of the NCZO, CZO, ISAG guidance for project-level reviews, and if applicable, CUP permit conditions of approval, would generally reduce future project-specific glare impacts. However, under implementation of the 2040 General Plan there could be limited circumstances in which future development would include reflective materials and be visible from one or more RRN roadways such that discomfort or disability glare for motorists traveling along an RRN roadway could occur. At this program level of analysis it not possible to conclude that all future development under the 2040 General Plan would not result in discomfort or disability glare to motorists traveling along an RRN roadway. Therefore, this impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure AES-1: New Implementation Program COS-X: Review Discretionary Development for Glare Effects Along Regional Roadway Network Roadways

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program COS-X: Review Discretionary Development for Glare Effects Along Regional Road Network Roadways

Applicants for future discretionary development projects that include use of reflective surfaces such as metal, glass, or other materials that could produce glare and that the County determines would potentially be visible to motorists traveling along one or more RRN roadways shall submit a detailed site plan and list of project materials to the County for review and approval. If the County determines that the project would include materials that would produce disability or discomfort glare for motorists traveling along one or more RRN roadways then the County will either require the use of alternative materials, such as high-performance tinted non-mirrored glass, painted (non-gloss panels), and pre-cast concrete or fabricated textured wall surfaces, or require that the applicant submit a study demonstrating that the project would not introduce a glare source that exceeds 3:1 in a luminance histogram, which consists of inputting a set of digital photographs from a subject glare source into a computer simulation program and generating a graph that identifies the brightness level of different sections of that scene, from darkest to brightest. Glare impacts from future projects would be considered significant when the glare source to the median of the background ration exceeds 3:1 in a luminance histogram.

Significance after Mitigation

With implementation of Mitigation Measure AES-1, which requires review and approval of potential reflective materials for future discretionary development, the potential discomfort and disability glare effects along RRN roadways would be substantially reduced because the County would ensure that projects would not introduce a glare source that exceeds 3:1 in a luminance histogram (i.e., glare levels less than 3:1 in a luminance histogram would not result in discomfort or disability glare for motorists traveling along an RRN roadway). This impact would be **less than significant**.

Impact 4.1-4: Create a New Source of Substantial Light or Glare Which Would Adversely Affect Day or Nighttime Views in the Area

Future development allowed to occur as a result of implementation of the 2040 General Plan is described under Impact 4.1-1, above, and may increase the ambient nighttime lighting and introduce materials that could potentially result in glare within unincorporated areas of the county.

New light sources could include light from new residential developments, street lighting, parking lot lights, security-related lighting, and lighting associated with increased traffic volumes. These new light sources could result in adverse effects on adjacent land uses through the “spilling over” of light into these areas and creating “sky glow.” Daytime glare could be produced by the increase in commercial, industrial, and residential structures, which could introduce materials, such as metal and glass, that reflect sunlight.

Based on the Guidelines for Orderly Development, which direct urban type development within Existing Community and Urban area designation boundaries, new sources of substantial light or glare which would adversely affect day or nighttime views are unlikely as these areas already feature similar densities and intensities that generate light and glare. Future development outside of these areas, and within the Open Space, Agricultural and Rural land use designations, would be subject to the Save Open Space and Agricultural Resources ordinance which prohibits the conversion of these land uses to urban type development without a majority vote of the electorate.

The Open Space land use designation would allow for a maximum building lot coverage of five percent, development of one dwelling unit per parcel, and a minimum parcel size of 10 acres. A CUP is required for the development of other allowed uses within the Open Space designation including but not limited to composting operations, greenhouses greater than 20,000 square feet, correctional institutions, fire stations, and oil and gas wells. A CUP is based upon a discretionary decision required prior to initiation of particular uses not allowed as a matter of right and may be denied on the grounds of unsuitable location or may be conditioned in order to be approved.

The Agriculture land use designation would allow for a maximum building lot coverage of 5 percent, development of one dwelling unit per parcel and a minimum parcel size of 40 acres. A CUP is required for the development of other allowed uses within the Agricultural land use designation including but not limited to other uses could include greenhouses greater than 20,000 square feet, principal and accessory structures related to agriculture, oil and gas wells, and composting operations.

The Rural land use designation would allow for a maximum building lot coverage of 25 percent, one dwelling unit per parcel and a minimum parcel size of 2 acres. All of these land use designations would allow for the development of an Accessory Dwelling Unit on the subject parcel.

Based upon the larger minimum lot sizes, lot coverage restrictions, fire code issues such as lack of secondary access in remote or geologically restrictive areas, and more limited access to water, utilities and infrastructure, any or all which can effectively prohibit or increase the cost of future development for new dwelling units or other allowed uses, thereby reducing potential development that may introduce new light sources and daytime glare to these areas. Additionally, adverse effects on adjacent land uses through light “spill over” and the introduction of “sky glow” would be lower given the lower density and intensity type of development allowed in these rural areas.

In addition, the NCZO and CZO include the following development standards that reduce potential light and glare impacts which may be caused by future development.

- ▶ NCZO Section 8106-8.6 require light fixtures over two feet in height not be placed in side setbacks and lights in excess of 150 watts and not result in direct illumination of adjacent properties;
- ▶ NCZO Section 8107-5.5.10 requires that oil development lighting be kept to a minimum to approximate normal nighttime light levels;

- ▶ NCZO Section 8107-31.10 requires that recreational vehicle/mini-storage lighting shall not create a nuisance upon nor otherwise negatively impact neighboring uses. Any lighting shall be directed into the project and not toward neighboring properties;
- ▶ NCZO Section 8107-45(k)(s) and CZO Section 8175-5.20.3(t) requires wireless communication facility lighting be down-shielded and controlled using motion sensors to minimize glare and light directed at adjacent properties or environmentally sensitive habitats;
- ▶ NCZO Section 8108-5 (12) and CZO Section 8176-4.12 requires that motor vehicle parking area lighting be lighted with a minimum 1 footcandle of light at ground for security; lights that serve non-residential land uses, except those required for security, be extinguished at the end of the working day and turned on no sooner than 1 hour before the commencement of working hours; be located away from trees to reduce obstruction of light by tree canopies; when adjacent to a residential land use or residentially zoned lot be arranged and shielded so that the light will not directly illuminate the lot or land use; be full cut-off fixtures and recessed or flush-mounted and equipped with flat lenses for parking area canopies or similar structures;
- ▶ NCZO Section 8109-4.1(5)(a)6) requires lighting within the Scenic Resource Protection Overlay Zone that causes glare, illuminates adjacent properties, or is directed skyward in rural areas be minimized;
- ▶ NCZO Section 8109-4.5.5(d)(4), (5), and (8) requires lighting for commercial uses in the Community Business District Overlay Zone be shielded to avoid or mitigate negative impacts on the residential units; site planning and building design shall be compatible with and enhance the adjacent and surrounding neighborhood lighting, and comply with parking lot lighting requirements set forth in NCZO Section 8108-5 (12);
- ▶ NCZO 8109-4.7.4 require lighting restrictions and regulations such as shielding of light sources and brightness of security lighting within the Dark Sky Overlay Zone, which apply only to portions of the unincorporated Ojai Valley (including areas around Lake Casitas);
- ▶ NCZO 8109-4.8.2 prohibits lighting within the Habitat Connectivity and Wildlife Corridors Overlay Zone and along the perimeter of a lot, except those used for security/safety purposes and lights that blink, flash, rotate, or have intermittent fading, or strobe light illumination. This section also incorporates requirements such as shielding and downward-directed lighting, maximum brightness requirements, and standards for security lighting;
- ▶ NCZO Section 8110-6.4(c) requires indirect or diffused light for pedestrian viewing sign display structures such as kiosks;
- ▶ NCZO Section 8110-6.5 requires signs in open space, agricultural zones have indirect or diffused illumination and not exceed the brightness of a diffused light panel having cool white fluorescent 800 milliamper lights spaced at least ten inches on center. Lighting of signs in residential zones shall have indirect or diffused illumination;
- ▶ NCZO Section 8110-6.7 requires a CUP for freestanding off-site advertising signs with the number of light fixtures kept to a minimum and integrated into the design of the structure;
- ▶ NCZO Section 8119-1.4.2(c) requires that all buildings in the Saticoy Area Plan have light fixtures that are shielded so that light sources are not visible from a public right-of-way; and spotlights aimed solely at the object to be illuminated;

- ▶ NCZO Section 8119-1.6.3(b) requires all sign illumination not be visible from the ground and be limited to the sign area; aimed solely at the sign to be illuminated, and not be visible from an off-site location; neon lighting is limited to window signs that shall not flash, scintillate, move, or rotate;
- ▶ CZO Section 8177-2.1 prohibits flashing lights and illumination or glare from commercial sites onto adjacent properties or streets that may be considered either objectionable by adjacent residents or hazardous to motorists;
- ▶ CZO Section 8175-5.4.6 requires lighting for camp facilities be designed to not produce a significant amount of light and/or glare at the first offsite receptive use;
- ▶ CZO Section 8175-5.6.4 requires that lighting for film production activities not negatively impact neighboring areas or Endangered Species Habitat Areas (ESHA);
- ▶ CZO Section 8175-5.6.5(5) requires neighborhood consent for exterior night lighting that extends beyond the boundaries of the film permit area(s);
- ▶ CZO Section 8175-5.7.8(g) requires oil development lighting be controlled to not produce excessive levels of glare or abnormal light levels directed at any neighboring uses and kept to a minimum to maintain normal nighttime light levels in the area;
- ▶ CZO Section 8175-5.13.10.3(c) requires canopy sign illumination of display structures be by indirect or diffused light only;
- ▶ CZO Section. 8175-5.13.10.11 requires that illuminated signs be designed to minimize light and glare on surrounding rights-of-way and properties;
- ▶ CZO Section 8176-5(5) requires bicycle parking facilities lighting of not less than one foot-candle of illumination at ground level both interior and exterior during hours of use; and
- ▶ CZO Section 8176-9.5(c) prohibits illuminated PEV charging stations within 100 feet of environmentally sensitive habitat areas and prohibits direct light from a PEV charging station from illuminating a public street, walkway, or adjacent property in a manner that causes a nuisance, traffic hazard or safety hazard.

Further, policies incorporated into the 2040 General Plan would also ensure that future development would not introduce substantial light or glare that would adversely affect day or nighttime views. Policy LU-11.3 requires commercial and industrial development to be designed with appropriate buffers and operational conditions to minimize glare impacts on adjoining adjacent residential areas.

The 2040 General Plan would allow for future development that could introduce new sources of light and glare. However, the proposed land use pattern, Policy LU-11-3, and provisions of the NCZO and CZO adequately regulate light and glare impacts such that light and glare associated with future development would not be substantial and therefore would not adversely affect day or nighttime views. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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4.2 AGRICULTURE AND FORESTRY RESOURCES

This section evaluates the potential effects of implementing the 2040 General Plan on agriculture and forestry resources, including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance (defined as “Farmland” or “Important Farmland” in CEQA, pursuant to guidance in CEQA Section 21095 and State CEQA Guidelines Appendix G, and the County), as well as the potential to convert Important Farmland to nonagricultural use or forestland to nonforest use, result in indirect loss of agriculture due to land use conflicts, and conflict with zoning for agricultural use, a Williamson Act contract, or zoning for forestland or timberland. As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments on the notice of preparation included requests for discussion of the type, amount, and location of direct and indirect farmland conversion, indirect impacts to agricultural operations such as land use conflicts, cumulative impacts on agricultural land, potential contract resolutions for land in an agricultural preserve or enrolled in a Williamson Act contract, and use of agricultural conservation easements as a mitigation measure. Other comments expressed concerns regarding carbon dioxide (greenhouse gas) emissions from agriculture, pollution and health risks attributed to agricultural operations, and potential land use conflicts that may result from implementation of the 2040 General Plan. Comments also included a desire for organic or regenerative agriculture and carbon farming to reduce atmospheric carbon dioxide levels. These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A. The analysis in this section focuses on adverse impacts on agricultural and forestry resources and conflicts with agricultural land uses as a result of 2040 General Plan implementation; impacts on air quality, greenhouse gas emissions, and water quality are addressed, respectively, in Section 4.3, “Air Quality,” Section 4.8, “Greenhouse Gas Emissions,” and Section 4.10, “Hydrology and Water Quality.” Cumulative impacts are analyzed in Chapter 5.0, “Cumulative Impacts.”

4.2.1 Background Report Setting Updates

REGULATORY SETTING

Agriculture and forestry are described in the Background Report (Appendix B), Chapter 3, “Land Use,” (Section 3.3, “Annexation and Development Trends,” which provides a discussion of growth management ordinances, greenbelt agreements, SOAR voter initiatives); Chapter 9, “Agriculture,” (see Section 9.1, “Agricultural Resources,” Section 9.2, “Agricultural Production,” Section 9.3, “Agricultural Policies and Programs,” and Appendix 9.A, “Important Farmland Mapping Conversation Rate Tables”); and Section 12.2, “Climate Change Effects,” in Chapter 12, “Climate Change.” In addition to the information provided in these sections of the Background Report (Appendix B), the following information is relevant to understanding the potential impacts of the 2040 General Plan on agriculture and forestry resources.

State

California Land Conservation Act (Williamson Act Contract)

The State adopted the California Land Conservation Act in 1965, set forth at Government Code section 51200 et seq. (LCA, also known as the Williamson Act), to provide tax incentives to encourage the protection of agricultural and open space land. In 1969, the County adopted, and has subsequently revised, its “Guidelines for Implementation of the Land Conservation Act of 1965/the Williamson Act” (LCA Guidelines). All land with an Agricultural land use designation in the General Plan is considered an Agricultural Preserve and is eligible for an LCA contract. There are three types of LCA contracts in the County of Ventura: Crop Production (10 or 20 year terms), Animal Husbandry/Grazing (10 or 20 year terms) and Open Space/Wildlife Habitat Contract (20 year term). These contracts intend to preserve agricultural or open space land and discourage its premature conversion to other uses. Among other things, the LCA Guidelines establish eligibility criteria for these contracts. In exchange for the preservation of agricultural or open space land, participating property owners receive a reduction of property taxes that is limited to the agricultural or open space value of the property.

California Timberland Productivity Act of 1982

The Timberland Productivity Act of 1982 requires all counties and cities in California with productive private timberland to establish Timberland Production Zones (TPZs) for the purpose of discouraging the premature conversion of timberland to other uses (Government Code Section 51100 et seq.). The general plan must reflect the distribution of existing TPZ zoning and have a land use category that provides for timber production. TPZ zoning can also be used to implement the Conservation Element by husbanding timber resources. Patterned after the Williamson Act, TPZs are rolling 10-year contracts providing preferential tax assessments to qualified timberlands. Under this program, assessments on timber are based on the value of the timber at the time of harvest rather than an annual assessment on the market value of standing timber. Assessment of zoned timberland is based on a statutory value of land that is related to site capability and is annually indexed to changes in the periodic immediate harvest value.

ENVIRONMENTAL SETTING

Agriculture and forestry are described in the Background Report (Appendix B) in Chapter 3, “Land Use,” (Section 3.3, “Annexation and Development Trends,” provides a discussion of growth management ordinances, greenbelt agreements, SOAR voter initiatives); Chapter 9, “Agriculture,” (see Section 9.1, “Agricultural Resources,” Section 9.2, “Agricultural Production,” Section 9.3, “Agricultural Policies and Programs,” and Appendix 9.A, “Important Farmland Mapping Conversation Rate Tables”); and Section 12.2, “Climate Change Effects,” in Chapter 12, “Climate Change.” In addition to the information provided in the Background Report, the following information is relevant to understanding the potential impacts of the 2040 General Plan on agriculture and forestry resources:

- ▶ Timberland. The plan area does not contain land which produces timber commercially for eventual use as lumber or pulp; however, six parcels either currently or formerly used for Christmas tree farming are zoned Timberland Preserve (T-P) pursuant to the provisions of the Timberland Preserve Zone of the County Zoning Ordinance. The T-P zone is compatible with the Open Space, Agriculture and Rural land use designations (of the Land

Use Chapter). “Timber” refers to trees of any species maintained for eventual harvest for forest products purposes, whether planted or of natural growth, standing or down, on privately or publicly owned land, including Christmas trees, but does not include nursery stock. All six parcels are located in the Ojai Valley area. Together they make up approximately 55 acres and are identified by the following Assessor's Parcel Numbers: 030-0-230-17, 024-0-080-15 and 16, 032-0-160-07, 035-0-090-12, and 018-0-170-38. All properties are privately owned (Ventura County 2019).

4.2.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

To determine whether implementation of the 2040 General Plan would result in adverse impacts on agricultural and forest resources, the proposed land use diagram was compared to the location of existing agricultural and forestry resources, including Important Farmland Inventory Maps, Land Conservation Act Contract maps, and the County's aerial imagery. The analysis considers whether future development under the 2040 General Plan could result in loss of agricultural resources or conversion of agricultural resources to non-agricultural uses by allowing for non-agricultural land uses to be located directly on existing designated farmland. It also considers whether the 2040 General Plan would result in indirect loss of agricultural resources by allowing for non-agricultural land uses adjacent to classified farmland. Examples of indirect losses of agricultural resources due to land use conflicts include: decreased solar access due to building heights from nonagricultural uses, dust exposure from construction or ongoing operations, and a reduction in available water resources for irrigation. Indirect loss of agricultural soils is due to increased wind and water erosion and direct loss of important soils is attributed to removal or permanent overcovering. The analysis also evaluates the potential for conflicts between the 2040 General Plan land use designations and properties with existing zoning for agricultural use, Williamson Act contracts, and zoning for forestland, timberland, and timberland zoned Timberland Production. Loss of forestland or conversion of forestland to non-forest use is also evaluated in this section.

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan's impacts are based on the County of Ventura's adopted Initial Study Assessment Guidelines (ISAG), which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project's impacts, in the form of initial study checklist questions.

To develop thresholds of significance, the County has deviated from the ISAG threshold criteria, where appropriate, to consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, ISAG threshold 5a regarding loss of agricultural soils was supplemented to include reference to the Important Farmland Inventory Classifications (Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance) for consistency with the classifications used in Appendix G question II(a).

Appendix G questions II(b) through II(e) were added to address topics not included in ISAG including conflicts with zoning for agricultural use or Williamson contracts, conflicts with zoning for forest and timberland resources, loss or conversion of forestlands to non-forest use, and other changes in the existing environment that could result in the conversion of farmland to nonagricultural use or forestland to nonforest use.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant impact on agricultural and forestry resources if it would:

- ▶ Result in the direct and/or indirect loss Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance (defined as “Farmland” or “Important Farmland” in CEQA, pursuant to guidance in CEQA Section 21095 and State CEQA Guidelines Appendix G). Any project that would result in the direct and/or indirect loss of agricultural soils meeting or exceeding the following criteria would be considered as having a significant impact:

General Plan Land Use Designation	Important Farmland Inventory Classification	Acres Lost
Agricultural	Prime/ Statewide	5
	Unique	10
	Local	15
Open Space/Rural	Prime/ Statewide	10
	Unique	15
	Local	20
All Land Use Designations	Prime/ Statewide	20
	Unique	30
	Local	40

- ▶ Result in classified farmland nearby any nonagricultural land use or project that is closer than the distances set forth below, unless a justification exists for a waiver or a deviation from these distances, such that incompatibilities with adjacent land uses would not be created, based on the unique characteristics of the subject project:

Evaluation for All Nonagricultural Operations Projects	
	Distance from Nonagricultural Structures or Use and Common Boundary Line Adjacent to Classified Farmland
Without Vegetative Screening	300 feet
With Vegetative Screening	150 feet
New K-12 School	1,320 feet

- ▶ Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- ▶ Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]).

- ▶ Result in the loss of forestland or conversion of forestland to nonforest use.
- ▶ Involve other changes in the existing environment that, because of their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forestland to nonforest use.

ISSUES NOT DISCUSSED FURTHER

As described above, this section includes an analysis of the potential for future development under the 2040 General Plan to result in adverse impacts to existing agricultural and forestry resources in the county, including analysis of potential conversion of farmland to nonagricultural use or forestland to nonforest use. The impact analysis provided in this section addresses the physical changes to the existing environment that could occur as a result of 2040 General Plan implementation. The 2040 General Plan would not result in any other changes that due to their location or nature would result in the conversion of Farmland to nonagricultural use or forestland to nonforest use. Therefore, this issue is not discussed further in this section.

ISAG Section 5a. uses the terminology “agricultural soils” when referring to lands designated under one of the Important Farmland Inventory Classifications (i.e., Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance). For consistency the remainder of this section uses the Important Farmland Inventory Classifications when referring to “agricultural soils” The terminology “agricultural soils” is not discussed further in this section.

Existing use and regulation of pesticides is an important issue in the county, and is addressed by the County in several ways. The Pesticide Use Enforcement (PUE) Program is a countywide program managed by the County Agricultural Commissioner (CAC) that benefits the public, the agricultural industry and the environment by permitting the legal and safe use of necessary pest control products and taking action against people who use these products illegally or unsafely. The CAC has jurisdiction over all uses of pesticides including home and garden uses, agricultural uses, industrial and institutional uses, and use for structural pest control. The PUE program is focused on the agricultural use of pesticides, and the use of Restricted Materials by all people and is closely monitored by the CAC. Staff from the CAC monitors the application of pesticides and issues fines of up to \$5,000 for any violations of applicable laws and regulations. Physicians are required by law to report any suspected exposure to a pesticide to the County Health Officer. All reported incidents are investigated by CAC staff to determine if any applicable laws or regulations were violated when the pesticide was used, and to assess if the illness was related to a pesticide exposure. The CAC also conducts inspections to see if required records are kept, if training has been provided to pesticide handlers and agricultural workers, and if required waiting periods have been observed before workers reenter treated fields or before crops are harvested. The CAC also collects data on pesticide use, which collected and sent to the California Department of Pesticide Regulation where data from all over the State is compiled annually. Permits for all restricted materials, or products deemed by the State to pose the most risk to handlers, fieldworkers, the public or the environment are issued by the Agricultural Commissioner. Specific conditions are issued by the CAC for the use of restricted materials, such as a site inspection and a 24-hour notification prior to application, to mitigate any hazards associated with application of restricted materials. The PUE program is primarily funded by the “mill tax,” a

tax on all pesticides sold in California which provides funding for both county and State programs that regulate pesticides.

The CAC's Office regularly engages in public outreach to school districts, concerned parties and underserved communities. Meetings are frequently held with groups such as the Central Coast Alliance United for a Sustainable Economy (CAUSE), Mixteco Indigena Community Organizing Project (MICOP), Lideras Campesinas, Ventura County Coalition Advocating for Pesticide Safety (VC-CAPS), Rincon Vitova, Insectary and others to address concerns and discuss viable alternatives to the most toxic pesticides. Title 3, Section 6692 of the California Code of Regulations, effective January 1, 2018, contains regulations that control the use of pesticides nearby schools and day-care centers. Under this rule pesticides, herbicides, and fumigants are prohibited within a quarter mile of public kindergarten through twelfth grade schools and licensed day care centers between the hours of 6:00 a.m. to 6:00 p.m., Monday through Friday. These rules allow applications of fumigants within 0.25 mile of school or day-care campuses if they are not in session and will not be in session for at least 36 hours after the application. Schools and day-care centers must be given at least a 24-hour notice before application (CDPR 2018, English n.d.). In the years 2018 through 2019 the Ventura County Grand Jury concluded that the County government effectively implemented regulations and effectively reduced the exposure of students and faculty in campuses adjacent to agricultural use of pesticides, herbicides, and fumigants (Ventura County Grand Jury 2019). Existing pesticide use and regulation is not discussed further in this section.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to agriculture and forestry resources and, specifically, the thresholds of significance identified above, include the following:

Agriculture Element

- ▶ **Policy AG-1.1: Agricultural Land Protection and Preservation.** The County shall continue to protect and preserve agricultural land by directing growth away from productive agricultural lands into cities, unincorporated urban areas, or existing communities and by supporting the acquisition or voluntary dedication of agriculture conservation easements. (RDR, MPSP) *[Source: New Policy]*
- ▶ **Policy AG-1.2: Agricultural Land Use Designation.** The County shall ensure that discretionary development located on land designated as Agricultural on the General Plan Land Use Diagram and identified as Prime Farmland or Farmland of Statewide Importance on the State's Important Farmland Inventory is planned and designed to remove as little land as possible from potential agricultural production and to minimize impacts on topsoil. (RDR, MPSP) *[Source: Existing GPP Policy 1.6.2.1, modified, SOAR]*
- ▶ **Policy AG-1.3: Greenbelt Agreements.** The County shall preserve agricultural land by retaining and expanding existing Greenbelt Agreements and encouraging the formation of additional Greenbelt Agreements. (MPSP, IGC) *[Source: Existing GPP Policy 1.6.2.5, SOAR]*

- ▶ **Policy AG-1.4: Land Conservation Act Contracts.** The County shall encourage Land Conservation Act (LCA) contracts on irrigated farmlands and Open Space lands. (MPSP, IGC, PI) *[Source: Existing GPP Policy 1.6.2.3, SOAR]*
- ▶ **Policy AG-2.1: Discretionary Development Adjacent to Agriculturally Designated Lands.** The County shall ensure that discretionary development adjacent to Agriculturally designated lands does not conflict with agricultural use of those lands. (RDR) *[Source: Existing GPP Policy 1.6.2.6, SOAR]*
- ▶ **Policy AG-2.2: Impacts from Transportation Capital Improvements.** The County shall plan transportation and other County capital improvements so as to avoid or mitigate impacts to Important Farmland to the extent feasible. (SO) *[Source: Existing GPP Policy 1.6.2.4, modified, SOAR]*
- ▶ **Policy AG-2.3: Right-to-Farm Ordinance.** The County's Right-to-Farm Ordinance shall be maintained and updated as needed to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas. (RDR) *[Source: New Policy]*

Implementation Programs

- ▶ **Implementation Program B: Right-to-Farm Ordinance.** The County shall periodically review and update the Right-to-Farm Ordinance when necessary to raise public awareness (including within the local real estate industry) of the Right-to-Farm provisions. *[Source: New Program]*

Land Use Element

- ▶ **Policy LU-7.1: Areas Appropriate for the Rural Land Use Designation.** The County shall require that lands designated as Rural are those located outside areas designated Urban or Existing Community which are deemed suitable and appropriate for low-density rural residential or recreational development. (RDR) *[Source: Existing GPP Policy 3.2.2.3, SOAR]*
- ▶ **Policy LU-7.2: Minimal Parcel Size for the Rural Land Use Designation.** The County shall require that the smallest minimum parcel size consistent with the Rural land use designation is two acres. The County may require larger minimum parcel sizes based on the parcel's Non-Costal Zoning Ordinance zoning classification. (RDR) *[Source: Existing GPP Policy 3.2.2.3, SOAR, modified]*
- ▶ **Policy LU-7.3: Maximum Lot Coverage Nonconforming Lots - Rural Land Use Designation.** The County shall require that the maximum lot coverage for lots of less than one acre (nonconforming) in area shall be as specified for the Rural designation, or 2,500 square feet plus 1 square foot for each 4,596 square feet of lot area over 5,000 square feet, whichever is greater. (RDR) *[Source: Existing GPP Figures 3.7a through 3.28b, Existing Community Building Intensity/Population Density Tables, Footnote No. 1]*
- ▶ **Policy LU-8.1: Areas Appropriate for the Agricultural Land Use Designation.** The County shall ensure that the Agricultural land use designation primarily includes lands that are designated as Prime Farmlands, Farmlands of Statewide Importance, or Unique Farmlands in the State's Important Farmland Inventory (IFI), although the County may not

designate land as Agricultural if small areas of agricultural land are isolated from larger blocks of farming land. In such cases, the Agricultural land is to be assigned to the Open Space or Rural designation for consistency with surrounding properties. (MPSP) [Source: Existing GPP Policy 3.2.2.4-1, SOAR]

- ▶ **Policy LU-8.2: Land Uses Appropriate for the Agricultural Land Use Designation.** The County shall ensure that land designated as Agricultural is used for the production of food, fiber, and ornamentals; animal husbandry and care; uses accessory to agriculture; and limited temporary or public uses which are consistent with agricultural or agriculturally related uses. (RDR) [Source: Existing GPP Policy 3.2.2.4-3, SOAR]
- ▶ **Policy LU-8.3: Minimal Parcel Size for the Agricultural Land Use Designation.** The County shall ensure that the smallest minimum parcel size consistent with the Agricultural land use designation is 40 acres. The County may require larger minimum parcel sizes based on the zone classification. (RDR, MPSP) [Source: Existing GPP Policy 3.2.2.4-2, SOAR]
- ▶ **Policy LU-8.4: Maximum Lot Coverage Nonconforming Lots - Agricultural Land Use Designation.** The County shall ensure that the maximum lot coverage of lots of less than 10 acres (nonconforming) in area shall be as specified for the Agricultural designation, or 2,500 square feet plus 1 square foot for each 22,334 square feet of lot area over 5,000 square feet, whichever is greater. Greater lot coverage may be allowed under discretionary permits for Farmworker Housing Complexes and existing uses/structures listed in the Non-Coastal Zoning Ordinance under the heading of "Crop and Orchard Production". (RDR) [Source: Existing GPP Figure 3.4 General Residential Building Intensity Standards/Population Density Range Table, Footnote No. 5, modified]

El Rio/Del Norte Area Plan

- ▶ **Policy ED-2.1: Agricultural Use on Agricultural Land.** The County shall require discretionary development located on land designated as Agricultural to not conflict with the agricultural uses of those lands. [Source: Existing El Rio/Del Norte Policy 3.2.2.2]
- ▶ **Policy ED-2.3: Minimize Impacts on Agricultural Uses.** The County shall condition discretionary development located adjacent to Agricultural designated land to minimize the impacts on the agricultural uses. [Source: Existing El Rio/Del Norte Policy 3.2.2.3]
- ▶ **Policy ED-2.4: Buffers for Agricultural Land.** The County shall require discretionary, non-agricultural land uses adjacent to Agricultural designated land shall be required to establish appropriate buffers as determined by the Agricultural Department. [Source: Existing El Rio/Del Norte Policy 3.2.2.4]
- ▶ **Policy ED-13.2: Buffers for Industrial Uses.** The County shall require new or expanding industrial uses adjacent to residential, commercial, open space and agricultural areas to provide buffers to protect these uses from nuisances and visual, audio and any air-borne intrusion, as well as minimizing truck traffic through residential areas. [Source: Existing El Rio/Del Norte Policy 3.8.2.3]

Ojai Valley Area Plan

- ▶ **Policy OJ-15.3: Assurance of Agricultural Operations in Open Space.** The County shall prohibit all discretionary development that would have a significant unavoidable

impact on agricultural operations in Open Space designated lands unless a statement of overriding considerations is adopted by the decision-making body. *[Source: Existing Ojai Valley Policy 3.2.2.3]*

- ▶ **Policy OJ-61-1: Buffers for Agricultural Operations.** The County shall require discretionary, non-agricultural land uses adjacent to agricultural operations to establish appropriate buffers. *[Source: Existing Ojai Valley Policy 1.5.2.1]*

Piru Area Plan

- ▶ **Policy P-65.3: Buffer for Agricultural Designations.** The County shall condition discretionary development adjacent to Agricultural designated land to provide an agricultural buffer (which may include a setback, vegetative screen, roadway, and/or an agricultural easement). The County shall require such buffer be subject to review and approval by the Agricultural Commissioner. *[Source: Existing Piru Policy 1.8.2.3]*
- ▶ **Policy P-12.1: Agricultural and Open Space on the Land Use Diagram.** The County shall locate Agricultural and Open Space in conformance with the Land Use Diagram which the County developed in accordance with the above goals (Figures P-2 and P-4). *[Source: Existing Piru Policy 3.6.2.1]*
- ▶ **Policy P-12.2: Land Designated Open Space or Agricultural:** The County shall designate land outside the Piru Urban and Existing Community areas as Open Space or Agricultural. *[Source: Existing Piru Policy 3.6.2.2]*
- ▶ **Policy P-66.2: Impacts on Agriculture.** The County shall review all discretionary development to minimize impacts on agriculture. *[Source: Existing Piru Policy 3.6.2.3]*

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

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

Approximately 65 percent of soil types within the county are suitable for agriculture production, which includes rangeland for grazing (Appendix B). These soil types are capable of producing varying amounts and types of agricultural commodities. Gentle slopes are typically more fertile and allow for water to easily percolate into the ground and are therefore more capable of producing larger crop variations. The most fertile soil association is Pico-Metz-Anacapa. This association accounts for seven percent of the soils in the county and is generally located in temperate climates near the coast, with an average soil depth of 60 inches or more. The Pico-Metz-Anacapa Association has a shallow slope no greater than nine percent. Similar to Pico-Metz-Anacapa, the Mocho-Sorrento-Garretson Association yields a majority of agricultural products, spanning 14 percent of the county. Mocho-Sorrento-Garretson Association is a well-drained soil, with 60 inches or more in soil depth (Appendix B).

As of 2016, the California Department of Conservation Farmland Mapping and Monitoring Program had inventoried over 555,000 acres of land in the county, classifying over 18,000 acres of land as Important Farmland. Overall, a total of 39 percent of the land within the county is designated as Important Farmland. According to Section 9 of the Background Report, the average farm size in the county was 131 acres as of 2012 (Appendix B). However, the California Department of Conservation's Farmland Mapping and Monitoring Program inventory

does not consider farmlands less than 10 acres, which could also be affected by future development under the 2040 General Plan. The County of Ventura contains prime agricultural lands which are highly productive due to the combination of soils, climate, and water availability; are suitable to a variety of orchard, row, and horticultural crops; and are capable of supporting commercially viable agricultural operations on minimum 9-acre parcels. According to the most recent data from the USDA (2017), the majority of farms in the county are less than 50 acres and approximately half of the farms are less than 10 acres.

Because of the programmatic nature of the 2040 General Plan, a precise quantification of the total loss of Important Farmland and farms smaller than 10 acres from future development under the 2040 General Plan cannot be known at this time. This analysis focuses on the potential indirect and direct loss of Important Farmland farms that are smaller than 10 acres that could occur based on the proposed land use diagram and the policies and implementation programs of the 2040 General Plan.

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as State Route (SR) 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water. The Agricultural and Open Space land use designations limit building lot coverage to 5 percent, and the Rural land use designation to 25 percent, of the total legal lot. Focusing future development within the Existing Community area designation (boundary) and the Urban area designation

(boundary) would reduce the potential for direct and indirect loss of Important Farmland and farms smaller than 10 acres. In addition, the 2040 General Plan would apply Rural, Agricultural, or Open Space land use designations to most existing Important Farmland in the county, which would minimize but not completely avoid potential direct loss of Important Farmland. Additionally, the 2040 General Plan would not make land use designation changes to existing land uses designated as Agricultural, Open Space, or Rural.

While overall the 2040 General Plan land use diagram protects agricultural land from higher intensity urban development, the land use designations of the 2040 General Plan could allow for limited instances in which individual future developments result in the direct or indirect loss of Important Farmland (including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance) that would exceed the County's established acreage limitation criteria for loss of farmland and result in the permanent loss of this valuable resource.

The County, through the ISAG, determines the significance of loss of Important Farmland based on general plan land use designation, important farmland inventory classification, and acres lost. For example, conversion of 5 or more acres of farmland of Prime or Statewide Importance with an Agriculture land use designation is considered significant under ISAG, whereas 40 acres with land use designations other than Agriculture or Open Space and designated as farmland of Local Importance must be converted before being considered a significant impact.

The ISAG defines an indirect loss of soils as a loss caused by increased wind or water erosion. Future development under the 2040 General Plan has the potential to result in indirect loss of soils. Increased residential, commercial, and/or industrial development in urban and nonurban areas that replaces pervious surfaces with impervious surfaces can impact percolation and infiltration of water and stormwater and cause elevated levels of runoff. Higher runoff rates increase the probability of water erosion and subsequently the indirect loss of important soils. Root systems increase water infiltration and physically bind or restrain soil particles preventing both water and wind erosion. A reduction in vegetative cover attributed to development or changes in farming practices, such as the loss of an agricultural tree row, increases the likelihood of water and wind erosion events. Indirect soil losses that would exceed the County's established acreage limitation criteria for would be considered a significant impact for this valuable resource.

The County has existing mechanisms in place to support the preservation of agriculture, which include the Guidelines for Orderly Development, the LCA program, greenbelt agreements, the Save Open Space and Agricultural Resources (SOAR) initiative, the County's Agricultural/Urban Buffer Policy, and the Non-Coastal Zoning Ordinance (NCZO). Approximately 164,000 acres of agricultural lands and open space in the county are covered by greenbelt agreements between the County and incorporated cities. Through these voluntary agreements cities express their commitment to not annex land within a greenbelt while the County expresses its commitment to restrict development to uses consistent with existing agricultural or open space zoning. In addition, changes to Rural, Agricultural, and Open Space land use designations and substantive changes to related Rural, Agricultural, and Open Space goals and policies cannot occur without countywide voter approval under the SOAR voter initiative. The SOAR initiative protects existing agricultural lands including Important Farmlands and farms smaller than 10 acres and limits land use conflicts that may result in direct or indirect loss of farmlands.

The Ventura County Guidelines for Orderly Development maintain the consistent theme that urban development should be located within incorporated cities as much feasibly possible. The guidelines encourage urban development to occur within Cities; enhance the regional responsibility of County government; and facilitate the orderly planning and development of Ventura County by allowing for urbanization in a manner that will accommodate the development goals of the individual communities while conserving the resources, which includes agricultural resources, of Ventura County (Ventura County 2018). LCA contracts intend to preserve agricultural land and discourage its premature conversion to non-agricultural uses. In exchange for the preservation of agricultural land, participating property owners receive a reduction of property taxes that are limited to the agricultural value of the property.

In addition, the County's Agricultural/Urban Buffer Policy substantially lessens the potential for indirect loss of Important Farmland by requiring buffers or screening between specified agricultural and non-agricultural land uses to prevent or minimize conflicts that may arise at the interface of agricultural lands and urban structures or ongoing non-farming activities. It applies where urban structures or ongoing non-farming activities are permitted adjacent to land: (1) in crop or orchard production; or (2) classified by the California Department of Conservation Important Farmland Inventory as Prime, Statewide Importance, Unique or Local Importance farmland. This policy applies to projects requiring discretionary approval by the County or a city where the proposed non-farming activity abuts or is located on land zoned Agriculture Exclusive, Open Space, or Rural Agriculture, where the farming activity is located outside a Sphere of Influence, as adopted by LAFCo (County of Ventura 2006).

The Agricultural/Urban Buffer Policy provides guidelines to prevent or minimize the conflicts that may arise at the agricultural/urban interface in the form of buffers/setbacks on the non-agricultural property. The policy protects the public health, safety, and welfare of residents while also protecting the economic viability and long-term sustainability of the agricultural industry. With respect to new urban development and non-agricultural uses the policy establishes requirements for fencing, minimum standards for a vegetative screen, acceptable uses within 300 feet of agriculture, and acceptable uses within 150 feet of agriculture where a vegetative screen is provided. With respect to modifications of existing uses and activities, the policy sets forth guidelines and requirements for situations where existing structures do not allow a 300- or 150-foot setback and where a school is located directly within 300 feet of agriculture.

Pursuant to Section 8178-5 of the Ventura County Coastal Zoning Ordinance development on agricultural lands is required to meet the following development standards to maintain agricultural viability: a.) the establishment or maintenance of the use or development will not significantly reduce, restrict or adversely affect agricultural resources or the economic viability of commercial agricultural operations on-site or in the area, b.) all structures will be sited to minimize conflicts with agricultural operations, and c.) the minimum amount of agricultural land shall be removed from production. Likewise, the Ventura County NCZO contains regulations to protect agricultural resources. Specifically, Section 8109-0.4 requires that permitted projects that consist of nonagricultural uses adjacent to agricultural land should be located, designed, and operated to minimize adverse effects on agriculture, as well as conflicts between agricultural and non-agricultural uses through the use of specific measures, including but not limited to use restrictions, buffer zones, fences and walls, and/or screening, which may be required in order to ensure that the above standard is met.

The 2040 General Plan also includes several policies and implementation programs that would further reduce potential impacts on Important Farmland. For example, Policies AG-1.1 and AG-1.2 protect agricultural land through the acquisition and dedication of agricultural easements and discretionary approval of projects that maintain and preserve Important Farmland. Policy AG-1.1 protects and preserves agricultural land by directing growth away from productive agricultural lands into cities, unincorporated urban areas, or existing communities and by supporting the acquisition or voluntary dedication of agriculture conservation easements. This policy focuses development in previously developed urban areas with a low likelihood of containing Important Farmland or farmland or farms that are less than 10 acres. Policy AG-1.2 ensures that discretionary development located on land designated as Agricultural on the General Plan Land Use Diagram and identified as Prime Farmland or Farmland of Statewide Importance on the State's Important Farmland Inventory is planned and designed to remove as little land as possible from potential agricultural production and to minimize impacts on topsoil. Implementation of this policy reduces the total amount of Important farmland and topsoil that is directly and indirectly lost as a result of development.

Policy AG-1.3 preserves agricultural land through the retention and expansion of existing greenbelt agreements and encouraging the formation of additional greenbelt agreements. Voluntary greenbelt agreements by cities express their commitment to not annex land within a greenbelt while the County expresses its commitment to restrict development to uses consistent with existing agricultural or open space zoning. Policy AG-1.4 encourages Land Conservation Act contracts on irrigated farmlands and open space lands, which minimizes conversions of agricultural land to non-agricultural land. Policy AG-2.2 encourages transportation and other county capital improvements to be planned in a manner to mitigate impacts on Important Farmland. Lastly, AG-2.3 maintains the Right-to-Farm Ordinance to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas.

The Ventura County Right-to-Farm Ordinance consists of two components. The first component is found in the enforcement sections of the Coastal and Non-Coastal Zoning Ordinances and is administered by the Planning Division's Zoning Enforcement Section (Sec. 8183-4.1 and Sec. 8114-2.1.1, respectively). These sections of the code protect farmers engaged in agricultural activity from public nuisance claims. The second component of the Right-to-Farm Ordinance consists of the following sections: Sec. 9121, Sec. 9131, and Sec. 9136. These sections require mandatory disclosure to neighboring property owners of the potential noise, odors, dust, and spraying that may result from farming and they detail procedures for mediation of disputes that may arise. The intent is to properly inform and to set realistic expectations for new residents and occupants of buildings located adjacent to farming operations. The second component of the "Right to Farm" Ordinance puts a new purchaser of property on notice that existing agricultural operations inherently have noise, odor and other potentially annoying activities that are associated with accepted agricultural operations. This protects the farming community, including Important Farmlands and farms less than 10 acres, from developments that would inhibit their ability to continue agricultural production.

Future development within the county would also be guided by Area Plans, which include additional policies designed to minimize the loss of Important Farmland. Of all the Area Plans, three include relevant policies, which are listed below.

The El Rio/Del Norte Area Plan includes the following policies that would reduce potential impacts on Agricultural lands.

- ▶ **Policy 3.2.2.2:** Discretionary development located on land designated as Agricultural shall not conflict with the agricultural uses of those lands.
- ▶ **Policy 3.2.2.3:** Discretionary development located adjacent to Agricultural designated land shall be conditioned to ensure that impacts on the agricultural uses are minimized.
- ▶ **Policy 3.2.2.4:** Discretionary, non-agricultural land uses adjacent to Agricultural designated land shall be required to establish appropriate buffers as determined by the Agricultural Department.
- ▶ **Policy 3.8.2.3:** New or expanding industrial uses adjacent to residential, commercial, open space and agricultural areas shall provide buffers to protect these uses from nuisances and visual, audio and any air-borne intrusion, as well as minimizing truck traffic through residential areas.

Like the Agricultural/Urban Buffer Policy, Policies 3.2.2.2, 3.2.2.3, 3.2.2.4, and 3.8.2.3 lessen the potential for indirect loss of Important Farmland through specific requirements for discretionary development. Policy 3.2.2.2 and 3.2.2.3 ensure that discretionary development would occur in such a manner that minimizes incompatibilities with Agricultural land and thus the indirect loss of Important Farmland. Policies 3.2.2.4 and 3.8.2.3 would establish buffers between non-agricultural land uses to project adjacent to Agricultural designated land.

The Ojai Valley Area Plan includes the following policies that would reduce potential impacts on Agricultural lands.

- ▶ **Policy 1.5.2.1:** Discretionary, non-agricultural land uses adjacent to agricultural operations shall be required to establish appropriate buffers.
- ▶ **Policy 3.2.2.3:** All discretionary development that would have a significant unavoidable impact on agricultural operations in Open Space designated lands shall be prohibited unless a Statement of overriding considerations is adopted by the decision-making body.

Like the Agricultural/Urban Buffer Policy, Policy 1.5.2.1 would substantially lessen the potential for indirect loss of Important Farmland by requiring buffers between specified agricultural and non-agricultural land uses to prevent or minimize conflicts that may arise at the interface of agricultural lands and urban structures or ongoing non-farming activities. Policy 3.2.2.3 prohibits discretionary development without appropriate approval by the decision making body. Discretionary development would be discouraged in land outside the Existing Community and Rural designated areas which contains land which is primarily in agricultural use and Important Farmlands.

The Piru Area Plan includes the following policies that would reduce potential impacts on Agricultural lands.

- ▶ **Policy 1.8.2.1:** Discretionary permits located on land designated as "Prime" or "Statewide Significance" by the State's Important Farmlands Inventory shall be planned and designed to remove as little land from agricultural production as possible and minimize impacts on topsoil.

- ▶ **Policy 1.8.2.3:** Discretionary development adjacent to Agricultural designated land shall be conditioned to provide an agricultural buffer (which may include a setback, vegetative screen, roadway, and/or an agricultural easement). Such buffer shall be subject to review and approval by the Agricultural Commissioner.
- ▶ **Policy 3.6.2.2:** Land outside the Piru Urban and Existing Community areas shall be designated as Open Space or Agricultural.
- ▶ **Policy 3.6.2.3:** All discretionary development shall be reviewed to ensure that impacts on agriculture are minimized.

Like the Agricultural/Urban Buffer Policy, Policies 1.8.2.1, 1.8.2.3 and 3.6.2.3 lessen the potential for indirect loss of Important Farmland through specific requirements for discretionary development. Policy 1.8.2.1 prevents loss of Important Farmlands by requiring projects to be designed in a manner that avoids the loss of topsoil from Important Farmlands. Preservation of topsoil from Important Farmlands allows for later agricultural use and prevents permeant loss of a valuable resource. Policy 1.8.2.3 would substantially lessen potential indirect loss of Important Farmland by requiring buffers or screening between specified agricultural and non-agricultural land uses to prevent or minimize conflicts that may arise at the interface of agricultural lands and urban structures or ongoing non-farming activities. Policy 3.6.2.2 indicates that all land outside the Piru Urban and Existing Community areas shall be designated as Open Space or Agricultural. The majority of Important Farmland is located outside the Piru Urban and Existing Community area designation as Open Space or Agricultural, which protects and preserves Important Farmlands. Changes to Open Space or Agricultural designations would require a voter approval under the SOAR Initiative and would discourage loss of Important Farmlands. Furthermore, compliance with 2040 General Plan policies and implementation programs would reduce potential impacts of future development under the 2040 General Plan.

Under the 2040 General Plan future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses would be concentrated within the Existing Community area designation (boundary) and the Urban area designation (boundary), which would lessen the potential for loss of Important Farmland and farms less than 10 acres. However, the planned land use designations of the 2040 General Plan would allow for future development that could result in the direct or indirect loss of Important Farmland (including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance) that would exceed the County's established acreage limitation criteria for loss of farmland and result in the permanent loss of this valuable resource. Any future development that causes the loss of Important Farmland that exceeds the County's acreage limitation thresholds would be considered significant and the full extent of development and the potential for the direct or indirect loss of Important Farmland cannot be quantitatively determined at this time. Therefore, potential loss of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance as a result of future development under the 2040 General Plan would be **potentially significant**.

Mitigation Measures

Mitigation Measure AG-1: New Policy AG-X Avoid Development on Agricultural Land
The County shall include the following new policy in the 2040 General Plan.

Policy AG-X Avoid Development on Agricultural Land

The County shall ensure that discretionary development located on land identified as Important Farmland on the State's Important Farmland Inventory shall be conditioned to avoid direct loss of Important Farmland as much as feasibly possible.

Mitigation Measure AG-2: New Implementation Program AG-X: Establish an Agricultural Conservation Easement

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program AG-X: Establish an Agricultural Conservation Easement

Applicants for discretionary projects that would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table below shall ensure the permanent protection of offsite farmland of equal quality at a 2:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement.

<u>General Plan Land Use Designation</u>	<u>Important Farmland Inventory Classification</u>	<u>Acres Lost</u>
<u>Agricultural</u>	<u>Prime/ Statewide</u>	<u>5</u>
	<u>Unique</u>	<u>10</u>
	<u>Local</u>	<u>15</u>
<u>Open Space/Rural</u>	<u>Prime/ Statewide</u>	<u>10</u>
	<u>Unique</u>	<u>15</u>
	<u>Local</u>	<u>20</u>
<u>All Land Use Designations</u>	<u>Prime/ Statewide</u>	<u>20</u>
	<u>Unique</u>	<u>30</u>
	<u>Local</u>	<u>40</u>

If the Planning Division, in consultation with the Agricultural Commissioner, determines that a discretionary project would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table above, the project applicant shall prepare and submit a report for the review and approval of the Planning Division in consultation with the Agricultural Commissioner which identifies a minimum of one proposed potential mitigation site suitable for ensuring the permanent protection of offsite farmland of equal quality at a 2:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement. The contents of the report shall be determined, reviewed, and approved by the Planning Division in consultation with the Agricultural Commissioner (hereafter referred to as the "reviewing agencies"), and shall include information necessary for the reviewing agencies and a qualified entity responsible for holding the conservation easement to determine the viability of the proposed mitigation site for the establishment of a permanent agricultural conservation easement. Among the factors necessary for approval by the reviewing agencies, the proposed mitigation site shall be located in the

County of Ventura unincorporated area, must not already have permanent protection, and must be equivalent to or greater than the type of Important Farmland (e.g., Unique farmland) that would be converted by the project. Among other terms that may be required by the reviewing agencies in consultation with a qualified entity, the terms of an agricultural conservation easement shall include a requirement that it run with the land. Project applicants are responsible for all costs incurred by the County and the qualified entity to successfully implement this mitigation measure. Proof of the successful establishment of an agricultural conservation easement shall be provided to the Planning Division prior to issuance of a zoning clearance.

Significance after Mitigation

Implementation of Mitigation Measures AG-1 and AG-2 would reduce impacts to Important Farmland to the extent feasible, however any direct or indirect loss of Important Farmlands would be considered a permanent loss of a valuable resource. Establishing agricultural conservation easements would conserve Important Farmland within the county, but would not prevent the loss of existing Important Farmland. There are no actions or policies that the County could feasibly mandate to fully replace the loss of Important Farmland. Therefore, this impact would remain **significant and unavoidable**.

Impact 4.2-2: Result in Classified Farmland Near Any Nonagricultural Land Use or Project ISAG Section 5b. uses the terminology “classified farmland” when referring to lands designated as grazing land, Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. As discussed in Impact 4.2-2, the County protects and preserves agricultural land through the SOAR Initiative, Agricultural/Urban Buffer Policy, Greenbelt Agreements, the Agricultural/ Urban Buffer Policy, the Right-to-Farm Ordinance, GP Policy AG-1.1, GP Policy AG-1.2, GP Policy AG-2.1, GP Policy AG-2.2, GP Policy AG-2.3, and Guidelines for Orderly Development.

Future development that could be accommodated under the 2040 General Plan is described in Impact 4.2-1. Existing classified farmland is located near several Existing Community area designations and Urban area designations in which relatively higher intensity residential, commercial, mixed use, and industrial land use designations are located. These include unincorporated areas to the north of the cities of Oxnard, Camarillo, Thousand Oaks, and Port Hueneme and to the east of Ojai as well as areas near SR 126 and SR 150. The actual location and siting details of future development under the 2040 General Plan in relation to classified farmland is not known at this time.

Residential growth in areas nearby agricultural lands has the potential to result in land use conflicts. Residential land uses are generally more sensitive and prone to conflict with adjacent agricultural land uses than commercial or industrial land uses. The placement of sensitive land uses, such as residences and schools, nearby classified farmland can negatively impact both uses due to conflict including odor nuisances and noise from agriculture machinery. The countywide Right-to-Farm Ordinance protects existing agricultural and farming operations from conflicts attributed to residential development. This is achieved through mandatory disclosure notifications to property owners who will be developing residential uses adjacent or near existing agricultural operations and protects farms from nuisance complaints associated with proper farming techniques. The intent of this ordinance is to properly inform and set realistic expectations for new residents or occupants of buildings located adjacent to farming operations. These practices are beneficial to all parties involved and ensure that a new purchaser of property is aware that existing agricultural operations inherently have noise, odor

and other potentially annoying activities that are associated with accepted agricultural operations. Furthermore, the County's SOAR initiative requires a majority vote of the people in order to redesignate land with an Agricultural, Open Space, or Rural land use designation. These voter initiatives prevent urban sprawl and protect greenbelt areas and agricultural uses from development impacts associated with nonagricultural uses.

The 2040 General Plan includes various measures to minimize conflicts between agriculture and urban land uses to ensure the long-term productivity of the agriculture sector. For example, Policies AG-1.1 and AG-1.2 protect and preserve agricultural land. The County's SOAR initiative requires countywide voter approval of most changes to the General Plan involving the Agricultural, Open Space, or Rural land use designations, and most changes to a general plan goal or policy related to those land use designations. Policy AG-2.1 ensures discretionary development adjacent to Agriculturally designated lands does not conflict with agricultural use of those lands. Policy AG-2.2 plans transportation and other County capital improvements to mitigate impacts to classified farmland as much as feasibly possible. Policy AG-2.3 maintains the County's Right-to-Farm Ordinance, which supports and provides a safeguard for existing agricultural and farming operations that could be threatened by encroaching residential development and reduces potential land use conflicts through the disclosure notifications provided to property owners who will be developing residential uses adjacent or near existing agricultural operations. The County of Ventura Agricultural/Urban Buffer Policy protects the economic viability and long-term sustainability of agriculture in the county. When applicable, this policy conditions urban developments or nonagricultural uses to provide and maintain a 300-foot setback and chain-link fence on the nonagricultural property use, or a 150-foot buffer/setback if a vegetative screen is used.

In addition to the policies and implementation programs of the 2040 General Plan, the Piru, Ojai Valley, and El Rio/Del Norte Area Plans also contain policies to protect classified farmland from incompatible land uses. Based on review of the planned land use diagram and maps of classified farmland, these areas contain the most classified farmland or land designated as agricultural in the county. These Area Plans require additional review by the CAC of discretionary projects so as to prevent incompatible land uses adjacent to agriculture.

Future development under the 2040 General Plan would not be expected to result in adverse impacts to agricultural uses by locating non-agricultural development near classified farmland due to policies and programs that limit conflicts to agricultural uses, establish buffers between crop production, orchard production, classified farmland and nonagricultural uses, to minimize agricultural land conversion. Future growth and development are expected to occur near or within existing community boundaries and cities, pursuant to the Guidelines for Orderly development. Therefore, the potential for conflicts would be minimal. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.2-3: Conflict with Williamson Act Contracts or Agricultural Preserves

The LCA establishes eligibility criteria for Agricultural Preserves (AGP) and Land Conservation Act Contracts in the plan area. All land with an Agricultural land use designation on the General Plan Land Use Diagram is considered an AGP under the LCA. Land designated Open Space by the County General Plan is potentially eligible for an LCA contract and may or may

not be located within an AGP. LCA contracts protect agricultural lands through financial incentives for property owners in the form of a property tax reduction. Under the LCA program, land designated as Agricultural or Open Space is eligible for LCA contracts. Annually, three values are calculated for properties restricted under the LCA. The Ventura County Assessor's Office takes the following three valuations of properties under LCA contract: (1) the discounted factored base year value, (2) the restricted LCA value, and (3) the current market value. The lowest of the three values is enrolled under the LCA Contract (County of Ventura Assessor's Office 2013). Under the LCA contract property owners continue to receive a reduction of property taxes until the property owner or County initiates a nonrenewal or terminates the contract. In the year 2016, approximately 204,000 acres in the county were designated as AGP. Under the LCA program, land designated as Open Space or Agricultural is also eligible for wildlife habitat contracts. These contracts provide financial incentives for property owners similar to that for LCA contracts. The LCA contract would have to expire before a development project beyond what is allowed under the terms of that contract is permitted.

As discussed in Impacts 4.2-1 and 4.2-2 the 2040 General Plan would not result in changes to existing land use designations and, therefore, would not directly conflict with any LCA contracts and AGP. Additionally, the 2040 General Plan includes various policies and programs that would limit the conversion of agricultural lands to nonagricultural uses. As discussed in Impact 4.2-2, future residential development that could occur under the 2040 General Plan has the potential to locate sensitive uses nearby land under LCA contracts and AGP which may result in land use compatibility issues for lands under LCA contracts. The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). Excluding a small area north of the city of Camarillo and to the northwest of the city of Thousand Oaks, existing LCA contracts are not located adjacent to the Existing Community area designation (boundary) or the Urban area designation (boundary).

The 2040 General Plan includes several policies to minimize conflicts between LCA contracts and AGP with urban land in order to maintain LCA contracts and AGP designations. For example, Policies AG-1.1 and AG-1.2 protect and preserve agricultural land. The County's SOAR initiative requires countywide voter approval of most changes to the general plan involving the Agricultural, Open Space, or Rural land use designations, and most changes to a general plan goal or policy related to those land use designations. Policy AG-2.1 ensures discretionary development adjacent to Agriculturally designated lands does not conflict with agricultural use of those lands.

The County is responsible for ensuring that discretionary development adjacent to agriculturally designated lands does not conflict with agricultural use of those lands, which includes protection of agricultural land under LCA contracts and designated as AGP. Policy AG-2.2 requires transportation and other capital improvements as much as feasibly possible to mitigate impacts to Important Farmland. The 2040 General Plan Policy AG-2.3 maintains and updates the County's Right-to-Farm Ordinance as needed to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas. This Right-to-Farm Ordinance protects the farming community, including land under LCA contracts and AGPs, from developments that would inhibit their ability to continue agricultural production.

As discussed in Impact 4.2-2, the County's Agricultural/Urban Buffer Policy protects the economic viability and long-term sustainability of agriculture in the unincorporated area. This policy would substantially lessen the potential conflict with LCA contracts or AGP by requiring buffers or screening between specified agricultural and non-agricultural land uses to prevent or minimize conflicts that may arise at the interface of agricultural lands and urban structures or ongoing non-farming activities. Most areas with a Residential, Mixed Use, Commercial, or Industrial land use designation under the 2040 General Plan would be located at least 300-feet from existing agriculture. Maintenance of the 300-foot buffer would minimize land use conflicts, as defined in the buffer policy. Reduction of land use conflicts encourages property owners to maintain their LCA contracts and AGP designations.

Development within the county would also be guided by nine existing Area Plans, which include additional policies designed to minimize conflicts between agricultural and nonagricultural land uses. Seven of these area plans have been reviewed and assessed to ensure internal consistency with the 2040 General Plan. The majority of recognized Important Farmland within the county is in unincorporated area. Of the seven, the Piru, Ojai Valley, and El Rio/Del Norte Area Plans were found to contain the most Important Farmland or land designated as agricultural. Applicable policies from the seven Area Plans are discussed in Impact 4.2-1. In alignment with the 2040 General Plan, these Area Plans require additional review by the Agricultural Department of discretionary projects so as to prevent incompatible land uses adjacent to agriculture.

No direct land use conflicts with existing LCA contracts would occur as a result of the land use diagram of the 2040 General Plan because it would not change the land use designation of any land under an existing LCA contract. No environmental impacts associated with residential development adjacent to any land under LCA/Williamson Act Contracts and AGP are expected to occur due to the protections and guidelines established in policies and programs that limit conflicts with agricultural uses and establishment of buffers between most agricultural and nonagricultural uses. Future growth and development are expected to occur near or within Existing Community area designation (boundary) and Urban area designation (boundary) , pursuant to the Guidelines for Orderly development. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.2-4: Conflict with Land Zoned as Forestland, Timberland, or Timberland Production Zone

The 2040 General Plan would not conflict with or result in a loss of land zoned as forestland, timberland, or Timberland Production Zone. The County of Ventura's NCZO regulates forest resources through Section 8104-6.2. This ordinance defines the purpose of the T-P zone, which are as follows: to maintain the optimum amount of the limited supply of timberland so as to ensure its current and continued availability for the growing and harvesting of timber, and compatible uses; to discourage premature or unnecessary conversion of timberland to urban area designations and other uses; and to encourage investment in timberlands based on reasonable expectation of harvest. The county does not contain land which produces timber commercially for eventual use as lumber or pulp; however, there are six Christmas tree farms totaling approximately 94 acres that are zoned Timber-Preserve (T-P) pursuant to the provisions of the Timberland Preserve Zone of the County NCZO. The 2040 General Plan proposes no changes to the existing Agricultural, Open Space, or Rural land use designations.

Therefore, the T-P zones would be compatible with the land use designations of the 2040 General Plan and no conflicts with land zoned as T-P would occur. The 2040 General Plan does not contain any programs or policies regarding timber resources. There are no specific programs or policies related to timber resources in the Area Plans. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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4.3 AIR QUALITY

This section evaluates the potential effects of implementing the 2040 General Plan on air quality, including whether it would conflict with, obstruct, or violate any applicable air quality plan or standard; result in a cumulatively considerable net increase of any criteria pollutant exceeding State or federal standards; expose the public to substantial pollutant concentrations; or generate objectionable odors affecting a substantial number of people. As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments on the notice of preparation (NOP) expressed concerns regarding oil and gas extraction in the county and the generation of fugitive dust emissions from agricultural practices. Comments also included recommended updates to construction mitigation proposed by the Ventura County Air Pollution Control District (VCAPCD). These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

4.3.1 Background Report Setting Updates

REGULATORY SETTING

In addition to the information provided in Section 8.1, “Air Quality,” of the January 2020 Background Report (Appendix B), the following information is relevant to understanding the potential air quality impacts of the 2040 General Plan.

Federal

Safer Affordable Fuel-Efficient Vehicles Rule

On August 2, 2018, the National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (EPA) proposed the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE Rule). This rule addresses emissions and fuel economy standards for motor vehicles and is separated in two parts as described below.

Part One “One National Program” (84 FR 51310) revokes a waiver granted by EPA to the State of California under Section 209 of the Clean Air Act to enforce more stringent emission standards for motor vehicles than those required by EPA for the explicit purpose of greenhouse gas emission (GHG) reduction, and indirectly, criteria air pollutant and ozone precursor emission reduction. This revocation became effective on November 26, 2019, restricting the ability of California Air Resources Board (CARB) to enforce more stringent GHG emission standards for new vehicles and set zero emission vehicle mandates in California. CARB has estimated the vehicle tailpipe and evaporative emissions impacts to criteria air pollutants from SAFE Rule Part One and has provided off-model adjustment factors to adjust emissions output from CARB’s Emission Factor (EMFAC) model.

Part Two would address Corporate Average Fuel Economy (CAFE) standards for passenger cars and light trucks for model years 2021 to 2026. This rulemaking proposes new CAFE standards for model years 2022 through 2026 and would amend existing CAFE standards for model year 2021. The proposal would retain the model year 2020 standards (specifically, the footprint target curves for passenger cars and light trucks) through model year 2026, but comment is sought on a range of alternatives discussed throughout the proposed rule. This proposal addressing CAFE standards is being jointly developed with EPA, which is simultaneously proposing tailpipe carbon dioxide standards for the same vehicles covered by the same model years. As of January 10, 2020, Part Two is not final. The timing of a final SAFE Rule Part Two and the outcome of any pending or potential lawsuits (and how such lawsuits could delay or affect its implementation) are unknown at this time.

State

Sierra Club v. County of Fresno

In December 2018, the California Supreme Court issued its decision in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, also known as the Friant Ranch decision. The case reviewed the long-term, regional air quality analysis contained in the EIR for the proposed Friant Ranch development. The Friant Ranch development site is located in unincorporated Fresno County within the San Joaquin Valley Air Basin, an air basin currently in nonattainment for multiple national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS), including ozone, respirable particulate matter with aerodynamic diameter of 10 micrometers or less (PM₁₀), and fine particulate matter with aerodynamic diameter of 2.5 micrometers or less (PM_{2.5}). The Court ruled that the air quality analysis failed to adequately disclose the nature and magnitude of long-term air quality impacts from emissions of criteria air pollutants and precursors “in sufficient detail to enable those who did not participate in its preparation to understand and consider meaningfully the issues the proposed project raises.” The Court noted that the air quality analysis did not provide a discussion of the foreseeable adverse effects of project-generated emissions on Fresno County’s likelihood of exceeding the NAAQS and CAAQS for criteria air pollutants, nor did it explain why it was not “scientifically possible” to determine such a connection. The Court concluded that “because the EIR as written makes it impossible for the public to translate the bare numbers provided into adverse health impacts or to understand why such translation is not possible at this time,” the EIR’s discussion of air quality impacts was inadequate.

Local

Ventura County Coastal Zoning Ordinance

The following guidelines are included in the Ventura County Coastal Zoning Ordinance and pertain to air quality (Ventura County 2018).

- ▶ **Section 8175-5.7.7 – Oil Development Design Standards:** Pipelines shall be used to transport petroleum products offsite to promote traffic safety and air quality. Transshipment of crude oil through an onshore pipeline for refining shall be a condition of approval for expansion of existing processing facilities or construction of new facilities.

Gas from wells shall be piped to centralized collection and processing facilities, rather than being flared, to preserve energy resources and air quality, and to reduce fire hazards and light sources.

Ventura County Non-Coastal Zoning Ordinance

The following guidelines are included in the Ventura County Non-Coastal Zoning Ordinance and pertain to air quality (Ventura County 2019).

- ▶ **Section 8107-5.5.5:** The following guidelines shall apply to the installation and use of oil and gas pipelines:
 - Pipelines should be used to transport petroleum products off-site to promote traffic safety and air quality.
- ▶ **Section 8107-5.5.7:** Gas from wells shall be piped to centralized collection and processing facilities, rather than being flared, to preserve energy resources and air quality, and to reduce fire hazards and light sources.

ENVIRONMENTAL SETTING

The Background Report (Appendix B) accurately describes the environmental setting for the purpose of this evaluation in Section 8.1, “Air Quality.” There is no additional information necessary to understand the potential air quality impacts of the 2040 General Plan.

4.3.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

This program-level analysis evaluates air quality impacts of 2040 General Plan implementation based on construction and operational activities associated with assumed land use development for the buildout year of 2040 relative to existing (2015) land use development in the county.

Emissions from construction activities represent temporary impacts that are typically short in duration, depending on the size, phasing, and type of development. Air quality impacts can nevertheless be acute during construction periods, potentially resulting in adverse localized impacts to air quality. Construction-related emissions are difficult to quantify with a high degree of accuracy at the general plan level because such emissions are dependent on the characteristics and circumstances of future individual development projects that are not known at this time. However, because construction associated with buildout under the 2040 General Plan would generate temporary criteria pollutant emissions, primarily due to the operation of construction equipment (e.g., oxides of nitrogen [NO_x] from vehicle exhaust, reactive organic gas/compounds [ROG] from architectural coatings) and truck trips, emissions have been estimated in this analysis, and are based on the anticipated amount of development under buildout the 2040 General Plan.

The quantitative analysis of construction-related emissions of criteria air pollutants and precursors were estimated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 computer program (CAPCOA 2016). Modeling was based on information specific to the 2040 General Plan including proposed land use designations and types. For modeling purposes construction activities under the 2040 General Plan are assumed to occur between 2020 and 2040 (20 years). Although the exact timing of construction activity over this period is unknown, for the purposes of modeling, it was assumed that development would occur gradually in equal annual increments over this time period. Maximum daily emissions

were generated using CalEEMod default outputs for the first year anticipated year of construction, which would be 2020. See Table 4.3-1 below for a full list of land use assumptions used for the modeling. Where information specific to the 2040 General Plan was not available, default values in CalEEMod were used. While the SAFE Vehicle Rule Part One has been adopted by EPA and NHTSA, the changes in emission factors for light-duty vehicles published by CARB address vehicle model year 2021 and later. For the purposes of this analysis, worker commute emissions were not adjusted based on this rule because the construction modeling is based on 2020, prior to the rule's effect.

Table 4.3-1 Land Use Assumptions for Air Quality Modeling in 2040 Buildout Scenario

Land Use Type	Amount	Unit
Single Family Housing	1,125	Dwelling units
Condo/Townhome	131	Dwelling units
Mid-Rise Apartments	25	Dwelling units
Light Industrial	423,661	Square feet
Heavy Industrial	394,643	Square feet
Mixed Retail	284,821	Square feet
Schools	570,982	Square feet
General Office Building	535,714	Square feet
Medical Office Building	388,839	Square feet

Source: Developed by Ascent Environmental in 2019

Operational emissions of criteria air pollutants and precursors were also estimated using CalEEMod. Modeling used information specific to the 2040 General Plan where available, including assumptions associated with land use designations and types that would be developed as part of the 2040 General Plan. Where information specific to the 2040 General Plan was not available, default values in CalEEMod that are based on Ventura County's climate and land use types were used. See Table 4.3-1, below, for a full list of land use assumptions used for the modeling. Operational emissions were estimated using CalEEMod for the following sources: area sources (e.g., landscaping equipment), energy use (i.e., electricity and natural gas consumption) and mobile sources (vehicle trips and vehicle miles travelled). CalEEMod default energy consumption rates were adjusted to account for energy efficiency improvements from the 2019 California Energy Code (California Code of Regulations [CCR] Title 24, Part 6), which will result in 7 percent and 30 percent reductions in energy consumption for residential and nonresidential (including residential buildings over three stories), respectively, when compared with the 2016 California Energy Code that is included in CalEEMod (CEC 2018).

Mobile-source emissions were estimated using a combination of CalEEMod and EMFAC2017 using annual vehicle miles traveled (VMT) estimates included in the traffic study for the 2040 General Plan and vehicle emissions factors specific to Ventura County. The annual VMT estimates were generated from the Ventura County Transportation Commission (VCTC) Travel Demand Model and were included in the traffic study (Appendix F). VMT estimates were generated for the baseline year (2015) and target year (2040), based on the land uses included in the 2040 General Plan. Mobile-source emissions associated with the target year (2040) were adjusted using EMFAC2017 to account for adoption of the SAFE Vehicle Rule Part One by EPA and NHTSA using emissions factors for criteria air pollutants provided by CARB (CARB 2019).

Some localized areas, such as traffic-congested intersections, can have elevated levels of carbon monoxide (CO) concentrations (CO hotspots). CO hotspots are defined as locations where ambient CO concentrations exceed the CAAQS (20 parts per million (ppm) for 1-hour standard, 9 ppm for 8-hour standard). In Ventura County, ambient air monitoring for CO stopped in 2004, with the approval of the U.S. Environmental Protection Agency Region 9, because CO background concentrations in El Rio, Simi Valley, and Ojai were much lower than the CAAQS. The highest recorded CO background concentration in Ventura County was in Simi Valley at 6.2 ppm for 1-hour and 1.6 ppm for 8-hour between the years 2000 and 2002 (VCAPCD 2003:6-5). Therefore, no CO hotspots are expected to occur in the unincorporated county from development associated with the 2040 General Plan, and additional CO modeling analysis is not warranted. In addition, with over 80 percent of the CO in urban areas emitted by motor vehicles, and with stricter emission standards due to State regulations, CO ambient concentrations should remain at or lower than the most recent CO monitoring data available for Ventura County.

The level of health risk from exposure to construction- and operation-related toxic air contaminant (TAC) emissions was assessed qualitatively because of the programmatic nature of the project and the fact that the specific types and locations of future discretionary projects are unknown. This assessment was based on the proximity of TAC-generating construction activity to off-site sensitive receptors, the number and types of diesel-powered construction equipment being used, and the duration of potential TAC exposure. As defined in the January 2020 Background Report, sensitive receptors are considered to be populations or uses that are more susceptible to the effects of air pollution than the general population, such as long-term health care facilities, rehabilitation centers, retirement homes, convalescent homes, residences, schools, childcare centers, and playgrounds (Appendix B: 8-21).

Similarly, the assessment of odor-related impacts is based on the types of odor sources associated with the land uses that would be developed under the 2040 General Plan and their location relative to nearby sensitive receptors.

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on Ventura County’s adopted Initial Study Assessment Guidelines (ISAG), which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project’s impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, ISAG Section 1 states that the air quality assessment guidelines published by VCAPCD should be used for determining thresholds of significance for air quality impacts. VCAPCD’s guidance recommends the sample air quality checklist questions contained in Appendix G Section III(a-d), with additional guidelines specific to Ventura County.

CEQA-related air quality thresholds of significance are tied to achieving or maintaining attainment designations with the NAAQS and CAAQS, which are scientifically substantiated, numerical concentrations of criteria air pollutants considered to be protective of human health.

In consideration of new and more stringent NAAQS and CAAQS adopted since 2000, VCAPCD identified numerical thresholds for project-generated emissions of ozone precursors that would determine whether a project's non-VCAPCD permitted emissions would result in a cumulative, regional contribution (i.e., significant) to the baseline nonattainment status of Ventura County. VCAPCD's quantitative thresholds of significance for project-level CEQA evaluation may be used to determine the extent to which a project's emissions of ozone precursors would contribute to regional degradation of ambient air quality within Ventura County.

Using federal and State guidance pertaining to TACs, VCAPCD developed cancer risk thresholds for TAC exposure. Unlike criteria air pollutants, there is no known safe concentrations of TACs. Moreover, TAC emissions contribute to the deterioration of localized air quality because of the dispersion characteristics of TAC emissions that do not cause regional-scale air quality impacts. VCAPCD thresholds are designed to ensure that a source of TACs does not contribute to a localized, significant impact to existing or new receptors.

As such, the following thresholds of significance are used to determine whether implementation of the 2040 General Plan would produce a significant localized and/or regional air quality impact such that human health would be adversely affected. For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant air quality impact if it would:

- ▶ Conflict with or obstruct implementation of the 2016 Ventura County Air Quality Management Plan.
- ▶ Result in emissions of ROG that exceed 25 pounds per day (lb/day) countywide, and 5 lb/day in the Ojai Valley.
- ▶ Result in emissions of NO_x that exceed 25 lb/day countywide, and 5 lb/day in the Ojai Valley.
- ▶ Result in a cumulatively considerable net increase of any criteria pollutant within the South Central Coast Air Basin (SCCAB) that is in nonattainment status under an applicable State or federal ambient air quality standard.
- ▶ Expose the public to substantial pollutant concentrations, including TAC emissions that exceed 10 in 1 million for carcinogenic risk and/or a noncarcinogenic hazard index of 1.0 or greater.
- ▶ Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

While VCAPCD has not formally adopted construction-related thresholds of significance, VCAPCD recommends that construction-related emissions should be mitigated if ROG and NO_x estimates from heavy-duty construction equipment is anticipated to exceed the 5 lb/day threshold in the Ojai Valley or the 25 lb/day in the remainder of the county (VCAPCD 2003:5-3–5-4). For the purposes of this analysis, construction emissions associated with the 2040 General Plan are evaluated against these thresholds.

ISSUES NOT DISCUSSED FURTHER

The Area Plans for communities of El Rio/Del Norte, Lake Sherwood/Hidden Valley, North Ventura Avenue, Oak Park, Ojai Valley, Piru, and Thousand Oaks were reviewed for policies and implementation programs specific to these Area Plans that would potentially have impacts on the environment with respect to air quality. The 2040 General Plan would not result in substantive changes to Area Plan policies and implementation programs related to air quality. The Area Plan policies and implementation programs related to these issues are consistent with the 2040 General Plan policies and implementation programs, which are addressed in the following impact discussions. Therefore, the environmental effects of the Area Plan policies and implementation programs are not addressed separately in this section.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

2040 General Plan policies and implementation programs related to air quality and, specifically, the thresholds of significance identified above, include the following:

Circulation, Transportation, and Mobility Element

- ▶ **Policy CTM-2.11: Efficient Land Use Patterns.** The County shall establish land use patterns that promote shorter travel distances between residences, employment centers, and retail and service-oriented uses to support the use of public transportation, walking, bicycling, and other forms of transportation that reduce reliance on single-passenger automobile trips. (RDR, MPSP) *[Source: New Policy]*
- ▶ **Policy CTM-4.1: Reduce VMT.** The County shall work with Caltrans and VCTC to reduce VMT by:
 - facilitating the efficient use of existing transportation facilities,
 - striving to provide viable modal choices that make driving alone an option rather than a necessity,
 - supporting variable work schedules to reduce peak period VMT, and
 - providing more direct routes for pedestrians and bicyclists. (MPSP, SO) *[Source: Existing GPP Goal 4.2.1.6, modified]*
- ▶ **Policy CTM-4.2: Alternative Transportation.** The County shall encourage bicycling, walking, public transportation, and other forms of alternative transportation to reduce VMT, traffic congestion, and greenhouse gas emissions. (PI) *[Source: New Policy]*
- ▶ **CTM-6.1: Routine Use of Alternative Transportation Options.** The County shall support the integration of emerging technologies that increase the routine use of alternative transportation options to decrease single-passenger automobile travel. (MPSP) *[Source: New Policy]*

Public Facilities, Services, and Infrastructure Element

- ▶ **Policy PFS-2.5: County Employee Trip Reduction.** The County shall encourage its employees to reduce the number and distance of single-occupancy vehicle work trips. (SO) *[Source: New Policy]*

- ▶ **Policy PFS-2.6: County Alternative Fuel Vehicle Purchases.** The County shall review market-available technologies for alternative fuel vehicles and prioritize purchase of vehicles to reduce greenhouse gas emissions where economically feasible. (SO) *[Source: New Policy]*

Conservation and Open Space Element

- ▶ **Policy COS-7.1: Minimum Site Area.** The County shall only approve discretionary development for oil and gas development if the area of ground disturbance constitutes the minimum necessary to accomplish the project objectives. (RDR) *[Source: Existing El Rio/Del Norte Area Plan Policy 1.3.2.4 and Ojai Valley Area Plan Policy 1.3.2.8, modified]*
- ▶ **Policy COS-7.3: Compliance with Current Policies, Standards, and Conditions.** The County shall require new or modified discretionary development permits for oil and gas exploration, production, drilling, and related operations be subject to current State and County policies, standards, and conditions. (RDR) *[Source: Existing Ojai Valley Area Plan Policy 1.3.2.3 and Piru Area Plan Policy 1.2.2.3, modified]*
- ▶ **Policy COS-7.4: Electrically-Powered Equipment for Oil and Gas Exploration and Production.** The County shall require discretionary development for oil and gas exploration and production to use electrically-powered equipment from 100 percent renewable sources and cogeneration, where feasible, to reduce air pollution and greenhouse gas emissions from internal combustion engines and equipment. (RDR) *[Source: Existing Ojai Valley Area Plan Policy 1.3.2.3 and Piru Area Plan Policy 1.2.2.3, modified]*
- ▶ **Policy COS-7.7: Conveyance for Oil and Produced Water.** 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. (RDR) *[Source: New Policy]*
- ▶ **Policy COS-7.8: Gas Collection, Use, and Disposal.** 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. (RDR) *[Source: Existing Ojai Valley Policy 1.3.2.2]*
- ▶ **Policy COS-8.1: Reduce Reliance on Fossil Fuels.** The County shall promote the development and use of renewable energy sources (e.g., solar, thermal, wind, tidal, bioenergy) to reduce dependency on petroleum-based energy sources. (IGC, RDR) *[Source: New Policy]*
- ▶ **Policy COS-8.2: Incentives for Energy Efficiency.** The County shall encourage the State and energy utility companies to provide programs, rebates, and incentives for energy efficiency installation and retrofit projects. (IGC) *[Source: Existing GPP Goal 1.9.1.3, modified]*
- ▶ **Policy COS-8.6: Zero Net Energy and Zero Net Carbon Buildings.** The County shall support the transition to zero net energy and zero net carbon buildings, including the electrification of new buildings. (RDR) *[Source: New Policy]*
- ▶ **Policy COS-8.12: Energy Conservation in Area Plan Land Use Policies.** Land use policies in Area Plans should be developed to promote energy conservation and should include the following:

- The pattern of residential, commercial and industrial land use should be compact, relate to transit routes and centers and minimize vehicular travel.
- The Infill of vacant lots should be encouraged over step-out developments.

(RDR) [Source: Existing GPP Policy 1.9.2.2]

Implementation Programs

- ▶ **Implementation Program M: Sustainable Building, Siting, and Landscaping Practice Guidelines.** The County shall prepare sustainable building, siting, and landscaping practice guidelines that promote a whole systems approach to building designs and construction techniques that reduce consumption of non-renewable resources such as oil, gas and water and promote renewable energy use. [Source: New Program]

Hazards and Safety Element

- ▶ **Policy HAZ-10.1: Air Pollutant Reduction.** The County shall strive to reduce air pollutant from stationary and mobile sources to protect human health and welfare, focusing efforts on shifting patterns and practices that contribute to the areas with the highest pollution exposures and health impacts. (MPSP, RDR, SO, IGC, PI, JP) [Source: New Policy]
- ▶ **Policy HAZ-10.2: Air Quality Management Plan Consistency.** The County shall prohibit discretionary development that is inconsistent with the most recent adopted Air Quality Management Plan (AQMP), unless the Board of Supervisors adopts a statement of overriding considerations. (RDR) [Source: Existing GPP Policy 1.2.2.1, modified]
- ▶ **Policy HAZ-10.3: Air Pollution Control District Rule and Permit Compliance.** The County shall ensure that discretionary development subject to VCAPCD permit authority complies with all applicable APCD rules and permit requirements, including the use of Best Available Control Technology (BACT) as determined by the VCAPCD. (RDR) [Source: Existing GPP Policy 1.2.2.5, modified]
- ▶ **Policy HAZ-10.4: Engagement with Air Quality Management Plan.** When the VCAPCD updates the AQMP, the County shall actively engage continuously and throughout the process. (IGC) [Source: Existing Lake Sherwood/Hidden Valley Program 2.3.3.1, modified]
- ▶ **Policy HAZ-10.5: Air Pollution Impact Mitigation Measures for Discretionary Development.** The County shall work with applicants for discretionary development projects to incorporate bike facilities, solar water heating, solar space heating, incorporation of electric appliances and equipment, and the use of zero and/or near zero emission vehicles and other measures to reduce air pollution impacts and reduce greenhouse gas emissions. (RDR) [Source: Existing Piru Area Plan Policy 1.7.2.4, modified]
- ▶ **Policy HAZ-10.6: Transportation Control Measures Programs.** The County shall continue to work with the VCAPCD and VCTC to develop and implement Transportation Control Measures (TCM) programs consistent with the AQMP to facilitate public transit and alternative transportation modes within the county. (IGC, FB) [Source: Existing GPP Policy 1.2.2.4 and Existing El Rio/Del Norte Area Plan Program 1.1.3.1, modified]

- ▶ **Policy HAZ-10.7: Fuel Efficient County Vehicles.** When purchasing new County vehicles, the County shall give strong preference to fuel efficient vehicles, include the use of zero emission vehicles when feasible. (SO, FB) *[Source: New Policy]*
- ▶ **Policy HAZ-10.8: Alternative Transportation Modes.** The County shall promote alternative modes of transportation that reduce single-occupancy vehicle (SOV) travel and enhance “last-mile” transportation options to improve air quality. (IGC, JP, PI) *[Source: El Rio/Del Norte Area Plan Goal 1.1.1.2, modified]*
- ▶ **Policy HAZ-10.9: Mitigation of Objectionable Odors.** The County shall require that discretionary development which will create objectionable odors that could affect a substantial number of people are appropriately mitigated. The project, pursuant to state law, shall be required to operate in accordance with the Rules and Regulations of the VCAPCD, with emphasis on Rule 51, Nuisance throughout the life of the permit. (RDR) *[Source: Existing El Rio/Del Norte Area Plan Policy 1.1.2.3, modified]*
- ▶ **Policy HAZ-10.10: Smoke-Free Environments.** The County shall continue to designate, promote, and enforce smoke-free environments to reduce toxins in the air and exposure to second-hand smoke. (PI, SO) *[Source: New Policy]*
- ▶ **Policy HAZ-10.11: Air Quality Assessment Guidelines.** In evaluating air quality impacts, the County shall consider total emissions from both stationary and mobile sources, as required by the California Environmental Quality Act. The County shall evaluate discretionary development for air quality impacts using the Air Quality Assessment Guidelines as adopted by the Ventura County Air Pollution Control District (APCD), except that emissions from APCD-permitted sources shall also be included in the analysis. The County shall revise the Initial Study Assessment Guidelines to implement this policy. (RDR) *[Source: Existing GPP Policy 1.2.2.2, modified]*
- ▶ **Policy HAZ-10.12: Conditions for Air Quality Impacts.** The County shall require that discretionary development that would have a significant adverse air quality impact shall only be approved if it is conditioned with all reasonable mitigation measures to avoid, minimize or compensate (offset) for the air quality impact. The use of innovative methods and technologies to minimize air pollution impact shall be encouraged in project design. (RDR) *[Source: Existing GPP Policy 1.2.2.3, modified]*

Agriculture Element

- ▶ **Policy AG-2.3: Right-to-Farm Ordinance.** The County’s Right-to-Farm Ordinance shall be maintained and updated as needed to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas. (RDR) *[Source: New Policy]*
- ▶ **Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment.** The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment when feasible. (PI, JP) *[Source: New Policy]*
- ▶ **Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps.** The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilities to eliminate or reduce stand-by charges. (SO) *[Source: New Policy]*

Implementation Programs

- ▶ **Implementation Program I: Fossil Fuel-Powered Equipment Replacement.** The County shall coordinate with the Air Pollution Control District and electric utilities to develop a program to establish a countywide fossil fuel-powered equipment conversion target, track progress on conversions to renewable energy-sourced electric-powered systems and provide technical assistance to users considering replacement of pumps. *[Source: New Program]*
- ▶ **Implementation Program J: Alternative Fuel Funding for Agricultural Operations.** The County shall coordinate with the VCAPCD to develop a program to identify funding sources or develop financial or regulatory incentives to encourage the switch to electric or alternatively fueled agricultural equipment, when feasible. *[Source: New Program]*

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.3-1: Conflict with or Obstruct Implementation of the 2016 Ventura County Air Quality Management Plan

Ventura County is in nonattainment for ozone with respect to the CAAQS. As a result, VCAPCD is required to develop a plan to achieve and maintain the State ozone standards by the earliest practicable date. The 2016 Ventura County AQMP addresses the attainment and maintenance of the NAAQS and CAAQS. The AQMP ozone control strategy is based on anticipated city and county population growth. Thus, a general plan amendment or revision that would increase population growth greater than that estimated in the 2016 Ventura County AQMP would have a significant cumulative adverse air quality impact.

The AQMP ozone control strategy consists of 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 (VCAPCD 2017). Stationary source control measures include vapor collection systems on gasoline and oil storage tanks, landfill gas recovery systems, low NO_x burners on boilers, and replacing internal combustion engines with electric motors. These measures are included in rules adopted by VCAPCD. Transportation control measures include trip reduction strategies, vehicle substitution, VMT reduction, vehicle occupancy, and technological improvements. There are several 2040 General Plan policies that ensure consistency with the 2016 Ventura County AQMP. Policy HAZ-10.2 prohibits discretionary development that is inconsistent with the AQMP, and Policy HAZ-10.3 requires all discretionary development to comply with all applicable VCAPCD rules and permit requirements, including the use of BACT as deemed necessary by VCAPCD. Policies CTM-4.2, CMT-2.1 through CTM-2.25, and CTM-3.1 through CTM-3.8 seek to reduce vehicle trips through increasing the availability of alternative modes and accommodating the infrastructure needed to encourage bicycling and walking. Policy CTM-4.1 strives to reduce VMT and Policy CTM-4.3 aims to increase vehicle occupancy. Implementation of these policies would be consistent with the ozone control strategy of the 2016 Ventura County AQMP.

The population forecast used in the 2016 Ventura County AQMP was derived from the Southern California Association of Governments' 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. The 2040 population projection for unincorporated Ventura County is 113,600 (SCAG 2016:29). As discussed in Chapter 2, "Project Description," the 2040 General Plan estimates the population of the unincorporated county to be 101,832 by 2040.

Because the population estimates under implementation of the 2040 General Plan would be less than the population estimates assumed in the 2016 Ventura County AQMP, and policies under 2040 General Plan would be consistent with the ozone control strategy, the 2040 General Plan would not result in a significant cumulative adverse air quality impact because it would not conflict with or obstruct implementation of the 2016 Ventura County AQMP. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.3-2: Cause Construction-Generated Criteria Air Pollutant or Precursor Emissions to Exceed VCAPCD-Recommended Thresholds

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

The future development and other physical changes that could occur as a result of 2040 General Plan implementation as described above would generate construction-related emissions of criteria air pollutants and precursors, including ROG, NO_x, PM₁₀, and PM_{2.5}, from site preparation (e.g., excavation, clearing), off-road equipment, material delivery, worker

commute trips, and other activities (e.g., building construction, asphalt paving, application of architectural coatings). Typical construction activities that could occur with land use development include all-terrain forks, fork lifts, cranes, pick-up and fuel trucks, compressors, loaders, backhoes, excavators, dozers, scrapers, pavement compactors, welders, concrete pumps, concrete trucks, and off-road haul trucks, as well as other diesel-powered equipment as necessary. Fugitive dust emissions of PM₁₀ and PM_{2.5} would be associated primarily with site preparation/grading per CalEEMod, and vary as a function of soil silt content, soil moisture, wind speed, acreage of disturbance, and mobile sources. Emissions of ozone precursors would be emitted from the exhaust of construction equipment and on-road vehicles. Paving and the application of architectural coatings also would result in off-gas emissions of volatile organic compounds or ROG. PM₁₀ and PM_{2.5} would also be emitted from off-road equipment and vehicle exhaust.

As discussed previously, specific construction phasing and intensity are unknown. The levels of emissions generated through these activities would depend on the characteristics of individual future development projects under the 2040 General Plan, including the size and type of land uses being developed, which would determine the length and intensity of construction activity.

Construction activities were estimated to occur at a constant rate over the 2040 General Plan horizon period of 20 years. Table 4.3-1 above details the assumed development under the 2040 General Plan. Based on Table 4.3-1, construction emission estimates were modeled and are shown below in Table 4.3-2.

Table 4.3-2 Modeled Maximum Daily Emissions of Criteria Air Pollutants and Precursors Emissions (lb/day)

Construction Phase	ROG	NO _x	PM ₁₀	PM _{2.5}
Site Preparation	4.1	42.5	20.4	12.0
Grading	4.5	50.2	13.0	5.9
Building Construction	2.5	22.7	2.1	1.3
Paving	1.4	14.1	0.9	0.7
Architectural Coating	18.4	1.7	0.3	0.2
Maximum Daily Emissions	18.4	50.2	20.4	12.0
VCAPCD Countywide Threshold	25	25	N/A	N/A
VCAPCD Ojai Valley Threshold	5	5	N/A	N/A

Notes: ROG = reactive organic gas; NO_x = oxides of nitrogen; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter; lb/day = pounds per day; VCAPCD = Ventura County Air Pollution Control District; NA = not applicable.

Source: Calculations by Ascent Environmental in 2019

As shown above, construction activity associated with the 2040 General Plan would generate NO_x emissions in exceedance of the countywide threshold and ROG and NO_x emissions in exceedance of the Ojai Valley thresholds. However, these thresholds are for operational sources of emissions. VCAPCD has not adopted construction-related thresholds for criteria air pollutants or ozone precursors, as these sources of emissions are temporary. VCAPCD recommends mitigating construction emissions from heavy-duty off-road equipment if these emissions exceed the operational thresholds.

Construction activities resulting from implementation of the 2040 General Plan could contribute substantially to Ventura County's nonattainment status for ozone and PM₁₀ and could result in an increase in the potential for adverse health impacts to occur from ozone and PM₁₀. Policy HAZ-10.3 of the 2040 General Plan would require all discretionary projects to comply with applicable VCAPCD rules, including Rule 51 (Nuisance), Rule 50 (Opacity), and Rule 55 (Fugitive Dust). Implementation of this policy would reduce construction-generated emissions of criteria air pollutants and precursors, but it cannot be guaranteed that emissions from individual discretionary projects would be reduced to below the VCAPCD thresholds. Additionally, Policy COS-8.7 promotes sustainable building practices to reduce energy associated with construction.

The addition of NO_x, which is a precursor to ozone, could result in an increase in ambient concentrations in Ventura County and, moreover, increase the likelihood that ambient concentrations exceed the CAAQS and NAAQS. As summarized in the January 2020 Background Report, human exposure to ozone may cause acute and chronic health impacts including coughing, pulmonary distress, lung inflammation, shortness of breath, and permanent lung impairment. Also, the increase in construction-generated emissions of PM₁₀ could impede air quality planning efforts to bring Ventura County into attainment of the CAAQS for PM₁₀. However, it would be misleading to correlate the levels of criteria air pollutant and precursor emissions associated with implementation of the 2040 General Plan to specific health outcomes to sensitive receptors. While the description of the effects noted above could manifest in the recipient receptors, actual effects on individuals depend on individual factors, such as life stage (e.g., older adults are more sensitive), preexisting cardiovascular or respiratory diseases, and genetic polymorphisms. Even armed with this type of specific medical information (which is confidential to the individual), there are wide ranges of potential health outcomes from exposure to ozone precursors and particulates, from no effect to the effects described above. Therefore, other than determining the types of health effects that could occur, it would be speculative to more specifically correlate exposure to ozone precursors and particulates from the 2040 General Plan to specific health outcomes to receptors. By evaluating emissions of air pollutants against VCAPCD's thresholds, it is foreseeable that health complications associated with ozone and PM₁₀ exposure could be exacerbated to nearby sensitive receptors by construction-generated emissions.

Due to the nonattainment status of Ventura County for ozone and PM₁₀, construction activities associated with implementation of the 2040 General Plan may result in adverse air quality impacts to existing surrounding land uses and may contribute to the existing adverse air quality condition in the county. Further, as actual construction phasing is not known, it is possible that emissions may exceed or be below modeled emissions shown in Table 4.3-2. Nonetheless, based on conservative modeling, it is likely that emissions would exceed countywide and Ojai Valley thresholds at some point during buildout of the 2040 General Plan. The Hazards and Safety Element of the 2040 General Plan includes Policy HAZ-10.3 that would require discretionary projects to comply with VCAPCD rules that specifically focus on reducing criteria air pollutant and precursor emissions from construction activity. However, implementation of this policy cannot guarantee construction-generated emissions would be reduced to below the VCAPCD thresholds. Therefore, construction emissions could contribute to the existing nonattainment condition in the county with respect to the CAAQS and NAAQS for ozone and with respect to the CAAQS for PM₁₀ and could result in an increase in the potential for adverse health impacts to occur from exposure to ozone and PM₁₀. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure AQ-1a: New Policy HAZ-X: Construction Air Pollutant Best Management Practices

The County shall include the following new Policy HAZ-X in the 2040 General Plan.

Policy HAZ-X: Construction Air Pollutant Best Management Practices

The County shall ensure that discretionary development will, to the extent feasible, incorporate best management practices (BMPs) to reduce emissions to be less than applicable thresholds. These BMPs include but are not limited to the most recent VCAPCD recommendations for construction BMPs (per the Air Quality Assessment Guidelines or as otherwise identified by VCAPCD).

Mitigation Measure AQ-1b: New Implementation Program HAZ-X: Construction Air Pollutant Best Management Practices

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program HAZ-X: Construction Air Pollutant Best Management Practices

Applicants for future discretionary development projects that would generate construction-related emissions that exceed applicable thresholds, will include, but are not limited to, the mitigation measures recommended by VCAPCD (in its Air Quality Assessment Guidelines or otherwise), to the extent feasible and applicable to the project. The types of measures shall include but are not limited to: maintaining equipment per manufacturer specifications; lengthening construction duration to minimize number of vehicle and equipment operating at the same time; and using electric-powered or other alternative fueled equipment in place of diesel powered equipment (whenever feasible).

Mitigation Measure AQ-2a: New Policy HAZ-X: Fugitive Dust Best Management Practices

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

Policy HAZ-X: Fugitive Dust Best Management Practices

The County shall ensure that discretionary development which will generate fugitive dust emissions during construction activities will, to the extent feasible, incorporate BMPs that reduce emissions to be less than applicable thresholds.

Mitigation Measure AQ-2b: New Implementation Program HAZ-X: Fugitive Dust Best Management Practices

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program HAZ-X: Fugitive Dust Best Management Practices.

Applicants for future discretionary development projects which will generate construction-related fugitive dust emissions that exceed applicable thresholds will include, but are not limited to, the types of mitigation measures recommended by VCAPCD's Air Quality Assessment Guidelines, to the extent feasible and applicable:

- ▶ The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excess amounts of dust.
- ▶ The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excess amounts of dust.

- ▶ Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of watering (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.
- ▶ Fugitive dust produced during grading, excavation, and construction activities shall be controlled by the following activities:
 - All trucks shall be required to cover their loads as required by California Vehicle Code Section 23114.
 - All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary and reclaimed water shall be used whenever possible.
- ▶ Graded and/or excavated inactive areas of the construction site shall be monitored by (indicate by whom) at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.
- ▶ Signs shall be posted on-site limiting traffic to 15 miles per hour or less.
- ▶ During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in conjunction with VCAPCD when winds are excessive.
- ▶ Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.
- ▶ Personnel involved in grading operations, including contractors and subcontractors, should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.

Significance after Mitigation

Implementation of Mitigation Measures AQ-1a, AQ-1b, AQ-2a, and AQ-2b would reduce impacts to air quality to the extent feasible because construction-related emissions of criteria air pollutants and precursors would be minimized through the use of the highest rate diesel engines available for heavy-duty, off-road equipment; dust suppression techniques; the idling limits for heavy-duty diesel-powered equipment; and the use of alternatively fueled construction equipment. As shown in Table 4.3-3, these mitigation measures would reduce ROG and NO_x emission below the countywide thresholds but not the Ojai Valley thresholds.

Table 4.3-3 Mitigated Maximum Daily Emissions of Criteria Air Pollutants and Precursors Emissions (lb/day)

Construction Phase	ROG	NO _x	PM ₁₀	PM _{2.5}
Site Preparation	0.5	2.1	18.3	10.3
Grading	0.8	3.3	10.9	4.0
Building Construction	0.8	5.8	1.0	0.3
Paving	0.3	1.3	0.2	0.1
Architectural Coating	14.9	0.2	0.2	<0.1
Maximum Daily Emissions	14.9	5.8	18.3	10.0
VCAPCD Countywide Threshold	25	25	N/A	N/A
VCAPCD Ojai Valley Threshold	5	5	N/A	N/A

Notes: ROG = reactive organic gas; NO_x = oxides of nitrogen; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter; lb/day = pounds per day; VCAPCD = Ventura County Air Pollution Control District; NA = not applicable.

Although fugitive dust emissions would be reduced through mitigation, PM₁₀ emissions could still occur from construction of individual development projects. Because Ventura County is in nonattainment for PM₁₀ with respect to the CAAQS, construction emissions under the 2040 General Plan could exacerbate this existing air quality condition. Additionally, because it is unknown how many development projects could be under construction at the same time, ROG and NO_x emissions could continue to exceed VCAPCD's thresholds within the Ojai Valley. Therefore, because ozone precursor emissions could remain above recommended thresholds and the fact that Ventura County is in nonattainment for ozone with respect to the NAAQS and CAAQS, this impact would be **significant and unavoidable**.

Impact 4.3-3: Result in a Net Increase in Long-Term Operational Criteria Air Pollutant and Precursor Emissions That Exceed VCAPCD-Recommended Thresholds

Future development and other physical changes that could occur as a result of 2040 General Plan implementation, as described in Impact 4.3-2, would result in long-term operational emissions of ROG, NO_x, PM₁₀, and PM_{2.5}. Operational emissions would be generated from area sources (e.g., landscaping-related fuel combustion sources, the periodic application of architectural coatings, and the use of consumer products), energy use (e.g., electricity and natural gas), and from additional vehicle trips associated with all new land use development. Table 4.3-4 summarizes the maximum daily operation-related emissions of criteria air pollutants and precursors and the daily significance thresholds established by VCAPCD.

As shown in Table 4.3-4, operational activities would result in emissions of ROG and NO_x that exceed the VCAPCD thresholds of significance for both countywide and the Ojai Valley. As discussed in the "Thresholds of Significance" section, VCAPCD developed these thresholds in consideration of achieving and maintaining the NAAQS and CAAQS, which represent concentration limits of criteria air pollutants and precursors needed to adequately protect human health. Therefore, the 2040 General Plan's contribution to operational criteria air pollutants and precursors could result in greater acute or chronic health impacts compared to existing conditions.

Table 4.3-4 Summary of Maximum Daily Operational Emissions of Criteria Air Pollutants and Precursors in 2040 (lb/day)

Source Type	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Area	118.1	1.2	105	0.6	0.6
Energy	1.6	14.3	9	1.1	1.1
Mobile	16.8	70.8	387	319.2	85.8
Maximum Daily Emissions	136.6	86.3	502	320.9	87.5
VCAPCD Countywide Threshold	25	25	N/A	N/A	N/A
VCAPCD Ojai Valley Threshold	5	5	N/A	N/A	N/A

Notes: ROG = reactive organic gas; NO_x = oxides of nitrogen; CO = carbon monoxide; PM₁₀ = respirable particulate matter; PM_{2.5} = fine particulate matter; lb/day = pounds per day; VCAPCD = Ventura County Air Pollution Control District; NA = not applicable.

Totals may not sum exactly due to rounding.

Source: Calculations by Ascent Environmental in 2019

Stationary Source Facilities

Stationary sources, such as boilers, heaters, flares, cement plants, and other types of combustion equipment associated with industrial uses undergo a permitting process by VCAPCD. The permits approved by VCAPCD require emission caps for sources that are tied to attaining or maintaining the NAAQS and CAAQS. Stationary sources are required to implement and comply with applicable VCAPCD rule(s) for their specific operation. For example, VCAPCD Rule 26.2 requires the implementation of BACT, which may include the installation of emissions control equipment or implementation of administrative practices to reduce emissions, as deemed necessary by VCAPCD. A stationary source may also be required to offset its emissions of criteria air pollutants and precursors in order to be permitted. All new stationary sources that could be developed under the 2040 General Plan would be required to go through the permitting process and receive approval by VCAPCD prior to construction and operation. The APCD permitting program is a regulated process in which applicable industrial and commercial businesses are required to comply with APCD rules related to their respective operations. Examples of permitted sources include gas stations, auto body shops that perform motor vehicle coating on-site, landfills, graphic arts operations, asphalt production, mining operations, and oil and gas facilities. The APCD permitting program also requires source testing of emission control equipment, Operating & Maintenance (O&M) plan requirements of permitted equipment to ensure maintenance is being kept, monitoring of operating parameters to ensure compliance with VCAPCD rules and regulations, recordkeeping requirements, annual emissions inventory reporting, and annual compliance inspections by APCD staff to ensure all permit conditions are being met.

Summary

The 2040 General Plan includes policies that would reduce emissions of air pollutants associated with individual development projects. Policies HAZ-10.05 and HAZ-10.12 would require that discretionary development with significant adverse air quality impacts only be approved if it is conditioned with all reasonable mitigation measures to avoid, minimize or compensate for the impact. Policy COS-7.7 requires new discretionary oil wells to use pipelines to convey oil and produced water; oil and produced water shall not be allowed to be trucked for new discretionary oil wells. This would avoid air pollutant emissions that would otherwise result from trucking of oil and produced water from new discretionary oil wells. Policy COS-7.8 requires 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 of such gases shall not be allowed except in cases of emergency or for testing purposes. This would lessen air pollutant emissions that would otherwise result from flaring at new discretionary oil and gas wells. Analysis of the potential impacts of this policy on petroleum resources are addressed in Section 4.12, "Mineral and Petroleum Resources," of this EIR. Policies HAZ-10.6, CTM-2.11, CTM-4.1, CTM-4.2, and CTM-6.1 focus on reducing VMT through land use planning and the availability of alternative transportation options, which would reduce air pollutants associated with mobile sources through reducing the number of trips taken by individuals and the distance of those trips. Additionally, the 2040 General Plan includes many policies (e.g., CTM-2.11, CTM-2.13, CTM-3.1, CTM-4.2) that encourage trips made by biking, walking, and public transportation, which would reduce vehicular trips and thus reduce mobile-source air pollutant emissions.

While there are policies in the 2040 General Plan that would reduce criteria air pollutant and precursor emissions, it is unknown if emission levels from future development would be reduced below the VCAPCD countywide and Ojai Valley thresholds. Because Ventura County is in nonattainment for ozone with respect to the CAAQS and NAAQS and is in nonattainment for PM₁₀ with respect to the CAAQS, future development under the 2040 General Plan could contribute to the existing nonattainment status. This impact would be **potentially significant**.

Mitigation Measures

The 2040 General Plan policies described above require implementation of all feasible mitigation measures for all discretionary development projects. While individual projects may be able to reduce emissions to levels below applicable thresholds, the total emissions attributable to future development under the 2040 General Plan would exceed VCAPCD's thresholds and would be a considerable contribution to cumulative air pollutants in the region. No additional feasible mitigation is available to reduce this impact.

Significance after Mitigation

For the reasons provided above this impact would remain **significant and unavoidable**.

Impact 4.3-4: Result in a Short- or Long-Term Increase in Localized CO Emissions That Exceed VCAPCD-Recommended Thresholds

Local mobile-source CO emissions near roadway intersections are a direct function of traffic volume, vehicle speed, and traffic delay. A CO hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. Transport of CO is extremely limited because it disperses rapidly with distance from the source under normal meteorological conditions. However, under stable meteorological conditions, CO concentrations near roadways and/or intersections may reach unhealthy levels, adversely affecting nearby sensitive land uses, such as residential units, hospitals, schools, and childcare facilities. CO is a pollutant of localized concern and, therefore, is analyzed at the local level. Construction activities are rarely a cause of localized CO impacts because they do not typically result in substantial traffic increases at any one location. This impact focuses on operational increases in mobile sources of CO and is based on guidance available from VCAPCD and the South Coast Air Quality Management District (SCAQMD).

As discussed in the Methodology section above, Ventura County has been in attainment for both the 1-hour and 8-hour CO concentration standards for the CAAQS and NAAQS and ambient air monitoring for CO stopped in 2004. The maximum reported CO concentration data in Ventura County was 3.5 ppm for the 8-hour average in 2003, which is the year with the most recently available CO monitoring data. This is well below the 8-hour CAAQS standard of 20 ppm.

Given that Ventura County is in attainment for CO and is not projected to exceed CAAQS or NAAQS within the SCCAB, it is not anticipated that the adoption of the 2040 General Plan would result in localized CO impacts, considering that individual discretionary project implemented under the 2040 General Plan would be dispersed throughout the unincorporated county. Additionally, federal and State vehicle emissions standards are anticipated to result in a decrease in CO concentrations. Nonetheless, CO impacts are further analyzed using available operational thresholds recommended by SCAQMD. Based on the emissions modeling conducted for 2040 General Plan, and shown in Table 4.3-4 above, mobile-source CO emissions would not exceed 387 lb/day during operation, which is below the SCAQMD-recommended screening threshold of 550 lb/day (SCAQMD 2019). Refer to Appendix C for detailed modeling results.

For these reasons, local mobile-source CO emissions generated by future development that could be accommodated under the 2040 General Plan would not result in or substantially contribute to concentrations of CO that exceed the 1-hour or 8-hour CAAQS and NAAQS. This impact would be **less than significant**.

Mitigation Measures

No mitigation would be required for this impact.

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

Diesel PM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of diesel PM outweighs the potential for all other health impacts (i.e., noncancer chronic risk, short-term acute risk) and health impacts from other TACs (CARB 2003). Thus, diesel PM is the focus of this analysis. With regards to exposure of diesel PM, the dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher level of health risk for any exposed receptor. According to the Office of Environmental Health Hazard Assessment's guidance, exposure of sensitive receptors to TAC emissions should be based on a 30-year exposure period for estimating cancer risk at the Maximum Exposed Individual (MEI), with 9- and 70-year exposure periods at the MEI as supplemental information. Furthermore, a 70-year exposure period is required for estimating cancer burden or providing an estimate of population-wide risk (OEHHA 2015:8-1).

Construction Emissions

Future development and other physical changes that could occur as a result of 2040 General Plan implementation, as described in Impact 4.3-2, would generate temporary, intermittent emissions of diesel PM from the exhaust of off-road heavy-duty diesel-powered equipment used for site preparation, grading, paving, application of architectural coatings, on-road truck travel, and other miscellaneous activities.

Existing sensitive receptors are located throughout the plan area. However, at the general plan scale, individual sensitive receptors were not identified. In addition, studies show that diesel PM is highly dispersive and that concentrations of diesel PM decline with distance from the source (Zhu et al. 2002a). These studies illustrate that diesel PM is highly dispersive and that receptors must be near emission sources for a long period to experience exposure at concentrations of concern.

Given the temporary and intermittent nature of construction activities likely to occur within specific locations in the plan area (i.e., construction is not likely to occur in any one part of the plan area for an extended time), the dose of diesel PM of any one receptor is exposed would be limited. Therefore, considering the relatively short duration of diesel PM-emitting construction activity at any one location of 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.

Operational Emissions

Proximity to highways increases cancer risk and exposure to diesel PM. Similarly, proximity to heavily traveled transportation corridors and intersections would expose residents to higher levels of diesel PM. CARB recommends avoiding siting new sensitive land uses, such as residences, schools, daycare centers, playgrounds, or medical facilities, within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day (CARB 2005). As discussed in Section 8.1 of the January 2020 Background Report, and based on 2014 traffic data, several interstate and route segments located within or adjacent to Ventura County include annual average daily traffic volumes (AADT) in excess of 100,000 vehicles per day on State Route 23, State Route 118, and U.S. Highway 101. There are no segments along State Routes 1, 33, 34, 150, or 232, that exceed an AADT of 50,000 vehicles per day. There are two segments along Route 126 that have an AADT of 50,000. There are no rural roadways in Ventura County with volumes that exceed 50,000 vehicles per day (Caltrans 2014).

Additionally, implementation of the 2040 General Plan would accommodate future development that could generate new sources of TACs from commercial and industrial land uses. Per VCAPCD Rule 36 (New Source Review – Hazardous Air Pollutants), land uses that would construct or reconstruct stationary emissions from a major source would be required to obtain a permit and would have to install maximum achievable control technology (MACT) for air toxics, if deemed applicable by VCAPCD. This is also included as Policy HAZ-10.3 of the 2040 General Plan.

Due to the programmatic level of this analysis, the amount of specific types of projects and land uses and the specific locations of future development are not available. However, it is possible that future development as a result of the 2040 General Plan could result in new stationary sources associated with commercial and industrial land use development that could result in TAC exposure to existing or future planned sensitive land uses. However, the 2040 General Plan includes policies focused specifically on addressing exposure of sensitive receptors to TACs. Policies HAZ-10.5, HAZ-10.11, and HAZ-10.12 focus on addressing air quality impacts from discretionary development through requirements for air quality impact evaluations and implementation of mitigation measures to reduce air quality impacts. Policies LU-17.2, LU-17.4, and LU-17.5 provide land use compatibility guidance for the siting of residential land uses in designated disadvantaged communities near industrial land uses with the goal of minimizing health risks to people from industrial toxic or TAC emissions. These policies would serve to reduce the risk of exposing new and existing sensitive receptors to TAC emissions. Policy COS-7.2 would require that new oil wells subject to discretionary approval be located a minimum of 1,500 feet from residential dwellings and 2,500 feet from any school. Currently, the County's zoning standards state that wells should be located a minimum of 800 feet from sensitive uses (NCZO 8107-5.5.8 and CZO 8175-5.7.8), and must be located a minimum of 500 feet from dwelling units (NCZO 8107-5.6 and CZO 8175-5.7.8), 500 feet from schools in the non-coastal area (NCZO 8107-5.6), and 800 feet from schools in

the Coastal Zone (CZO 8175-5.7.8), unless these setback requirements are waived by occupants of the sensitive uses. The proposed setback increases of Policy COS-7.2 would reduce the potential for sensitive receptors at residential dwellings and schools to be exposed to air pollutants including toxic air contaminants associated with new oil wells subject to discretionary approval.

Further, new stationary TAC sources would be subject to Rule 36 and would be required to install MACT for toxics to receive permitting for the source. New stationary TAC sources that do not meet the requirements of Rule 36 would not receive permits and would not ultimately be approved for development, ensuring receptors would not be exposed to substantial concentrations of TACs.

Summary

As discussed above, implementation of the 2040 General Plan could result in exposure of sensitive receptors to construction-related TACs. However, given that future development under the 2040 General Plan would occur by 2040 and would occur in various areas throughout the county, it is unlikely that any one sensitive receptor would be exposed to construction-related TACs for extended periods of time. Therefore, construction activity as a result of the 2040 General Plan would not result in the exposure of existing or new sensitive receptors to a substantial increase in TAC emissions. The 2040 General Plan would also result in an increase in total VMT along local roadways within the county as a result of future growth and development. Because there are urban roads in the unincorporated county that exceed 100,000 vehicles per day and rural roads that exceed 50,000 vehicles per day, new sensitive receptors could be exposed to roadway traffic levels that could result in adverse health effects from TACs. Regarding stationary sources of TACs, as discussed above, the 2040 General Plan includes policies that would limit exposure of new sensitive receptors to TACs from stationary sources such as industrial land uses. Additionally, all new development undergoing discretionary review would be required to evaluate existing TAC exposure and incorporate available reduction measures in accordance with VCAPCD requirements, if necessary. In consideration of these factors, implementation of the 2040 General Plan could result in the exposure of new sensitive receptors to a substantial increase in TAC emissions. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure AQ-3: New Policy HAZ-10.X: Setback Requirements for Sensitive Land Uses Near Heavily Traveled Transportation Corridors

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

Policy HAZ-10.X: Setback Requirements for Sensitive Land Uses Near Heavily Traveled Transportation Corridors

The County shall require discretionary development for land uses which include sensitive receptors which are considered to be populations or uses that are more susceptible to the effects of air pollution than the general population, such as long-term health care facilities, rehabilitation centers, retirement homes, convalescent homes, residences, schools, childcare centers, and playgrounds are located at least 500 feet from any freeway or urban road with traffic volumes that exceed 100,000 vehicles per day, or rural roads that exceed 50,000 vehicles per day. New sensitive use structures can be located with 500 feet from a new or existing freeway or urban road with traffic volumes that exceed 100,000 vehicles per day, or

rural road with traffic volumes that exceed 50,000 vehicles per day only if a project applicant first prepares a qualified, site-specific health risk assessment (HRA). The HRA shall be conducted in accordance with guidance from VCAPCD and approved by VCAPCD. If the HRA determines that a nearby sensitive receptor would be exposed to an incremental increase in cancer risk greater than 10 in 1 million, then design measures shall be incorporated to reduce the level of risk exposure to less than 10 in 1 million. No further action shall be required if the HRA demonstrates that the level of cancer risk would be less than 10 in 1 million.

Significance after Mitigation

Implementation of Mitigation Measure AQ-3 would require that new sensitive receptors not be located within 500 feet of any freeway, urban or rural roadways experiencing traffic volumes that exceed 100,000 and 50,000 vehicles per day, respectively, which is the CARB-recommended setback distance (CARB 2005:10), unless a site-specific VCAPCD-approved HRA shows that associated levels of cancer risk at the sensitive receptors would not exceed 10 in 1 million. This would substantially lessen the exposure of new receptors to a substantial increase in TAC emissions. This impact would be reduced to **less than significant**.

Impact 4.3-6: Result in Other Emissions (Such as those Leading to Odors) Adversely Affecting a Substantial Number of People

Future development and other physical changes that could occur as a result of 2040 General Plan implementation, as described above in Impact 4.3-2, could expose existing sensitive receptors to future development that could include odor sources and may cause a nuisance. Additionally, new sensitive receptors could be exposed to existing land uses that include odors and may result in a nuisance. The occurrence and severity of odors impacts depends on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the affected receptors. While offensive odors rarely cause any physical harm, they can still be very unpleasant, leading to considerable distress among the public, and they often generate citizen complaints to local governments and regulatory agencies. VCAPCD Rule 51 states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endangers the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property." Enforcement of VCAPCD Rule 51 would serve to mitigate new odor-generating land uses other than agricultural operations developed as a result of the 2040 General Plan that may cause a nuisance to nearby sensitive receptors.

In regard to odors generated from agricultural operations, Ventura County's Code of Ordinances includes a "Right to Farm" ordinance (Ventura County Code of Ordinances Division 9, Chapter 1). The ordinance serves to protect and support agricultural land and operations within the county. Section 8114-2.1.1 states:

No agricultural activity, operation or facility that is consistent with this Chapter and the General Plan, and is conducted or maintained for commercial purposes in a manner consistent with proper and accepted customs and standards as established and followed by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after it has been in operation for more than one year if it was not a nuisance at the time it began.

To deter from potential conflicts with existing agricultural land uses, as part of the ordinance, the County is required to give notice of this ordinance to buyers of real property located in the county. The County also has a mediation process for any disputes involving agricultural land uses and issue opinions on whether certain agricultural land uses constitute a nuisance. The County's "Right to Farm" ordinance serves to mitigate issues regarding exposure of sensitive receptors to odors from agricultural land and operations while protecting agricultural land uses in the county. This ordinance would serve to protect agricultural lands in the county during implementation of the 2040 General Plan and mitigate issues regarding exposure of sensitive receptors to odors from agricultural land operation that may be considered a nuisance.

The Agriculture Element includes Policy AG-2.1 that addresses the siting of development adjacent to agriculturally designated land. This policy would serve to reduce potential odor impacts from the siting of new sensitive receptors in the county. The Agricultural Land Use Policy Direction of the Land Use and Community Character Element includes policies that restrict the introduction of conflicting land uses into agricultural areas, which would serve to reduce potential odors impacts to new sensitive receptors.

Minor odors from the use of heavy-duty diesel-powered equipment and the laying of asphalt during construction activities would be intermittent and temporary. Due to the characteristics of diesel exhaust emissions, odors generated from the use of heavy-duty diesel-powered equipment would dissipate rapidly within 150 meters (492 feet) (Zhu et al. 2002a, Zhu et al. 2002b). While construction would occur intermittently by 2040, these types of odor-generating activities would not occur at any single location, or within close proximity to the same off-site receptors, for an extended period of time and would not result in permanent odor sources. Therefore, construction is not anticipated to result in substantial odors.

Future nonresidential land uses or specific facilities in the county could generate odor emissions that could be a nuisance. However, the Land Use and Community Character Element includes land use compatibility policies that would serve to reduce potential impacts from receptors near existing odors sources. Additionally, VCAPCD Rule 51 regulates nonagricultural uses that potentially emit odors, further reducing the potential for odor impacts on existing and new sensitive receptors in the county. As a result, implementation of the 2040 General Plan would not result in odor impacts on existing sensitive receptors or future sensitive receptors. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

4.4 BIOLOGICAL RESOURCES

This section evaluates the potential effects of implementing the 2040 General Plan on biological resources, including special-status species, sensitive natural communities, wetlands, wildlife movement corridors, wildlife nursery sites, and biological resources protected by a local policy or ordinance. As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based primarily on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments on the notice of preparation (NOP) included concerns regarding endangered and threatened wildlife species, sensitive natural habitats including riparian and aquatic habitats, and wildlife movement corridors. These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

4.4.1 Background Report Setting Updates

REGULATORY SETTING

In addition to the information provided in Section 8.2, “Biological Resources,” of the Background Report (Appendix B), the following information is relevant to understanding and evaluating the potential biological resources impacts of the 2040 General Plan.

Ventura County Habitat Connectivity and Wildlife Corridor Ordinance

The County’s Habitat Connectivity and Wildlife Corridor ordinances, adopted in March of 2019, provide protections for areas designated as important wildlife corridors within the non-coastal unincorporated area in order to help preserve functional connectivity for wildlife and vegetation and to minimize loss of vegetation and habitat fragmentation. Two new overlay zones were established by the ordinances: the Habitat Connectivity and Wildlife Corridors (HCWC) Overlay Zone, and the Critical Wildlife Passage Areas (CWPA) Overlay Zone. Within the HCWC Overlay Zone, the ordinances require environmental review and discretionary approval of: (1) certain new development, including the construction of certain structures and removal of native vegetation, that is proposed near natural waterbodies/riparian areas or important wildlife crossing structures (e.g., bridges, culverts), and (2) wildlife impermeable fencing that would enclose large areas. Outdoor lighting is also subject to new regulations in the HCWC Overlay Zone. In order to encourage the compact siting of new development in the CWPA overlay zone, which is a particularly sensitive wildlife movement area located within the larger HCWC Overlay Zone, certain proposed development requires environmental review and approval unless the development is sited near existing development.

Marine Mammal Protection Act

The Marine Mammal Protection Act (MMPA) (16 U.S.C. Chapter 31), first enacted in 1972, provides for protection of all marine mammals in the United States, including but not limited to whales, dolphins, seals, and sea lions. The MMPA provides that it shall be unlawful, with certain permitted exceptions, to take a marine mammal in waters of the United States. Under the MMPA, “take” is defined as “harass, hunt, capture, collect, or kill, or attempt to harass, hunt, capture, collect, or kill any marine mammal.”

ENVIRONMENTAL SETTING

In addition to the information provided in Section 8.2, “Biological Resources,” of the Background Report (Appendix B), the following information is relevant to evaluating the potential biological resources impacts of the 2040 General Plan.

Special-Status Plants

Section 8.2, “Biological Resources,” of the Background Report contains special-status plant species occurrence data based in part on a 2016 review of the California Natural Diversity Database (CNDDDB) (Appendix B). Based on an updated review of the CNDDDB, as well as a search of the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database and the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation database, there are 75 additional special-status plant species known or with potential to occur in Ventura County (Table 4.4-1) (CNDDDB 2019; CNPS 2019; USFWS 2019). Fifty-four of these additional species have California Rare Plant Ranks of 4, which means that these species may have limited distribution throughout California and may have local significance or rarity (Table 4.4-1). However, these species may not be considered rare by the California Endangered Species Act (CESA) or federal Endangered Species Act (ESA) standards. While some of these species may not be locally rare within the plan area of the 2040 General Plan, all of these species should be considered at a project level.

Table 4.4-1 Additional Special-Status Plant Species Known or with Potential to Occur in Ventura County

Species	Regulatory Status ¹			Habitat
	Federal	State	CRPR	
Chaparral sand-verbena <i>Abronia villosa</i> var. <i>aurita</i>	USFS-S	–	1B.1	Chaparral, coastal scrub, desert dunes. Sandy areas. 246–5,249 feet in elevation. Blooms January–September.
Marsh sandwort <i>Arenaria paludicola</i>	FE	SE	1B.1	Marshes and swamps. Growing up through dense mats of <i>Typha</i> , <i>Juncus</i> , <i>Scirpus</i> , etc. in freshwater marsh. Sandy soil. 10–558 feet in elevation. Blooms May–August.
Big Bear Valley milk-vetch <i>Astragalus lentiginosus</i> var. <i>sierrae</i>	USFS-S	–	1B.2	Stony meadows and open pinewoods; sandy and gravelly soils in a variety of habitats. 5,610–10,597 feet in elevation. Blooms April–August.
Big Bear Valley woollypod <i>Astragalus leucolobus</i>	–	–	1B.2	Lower montane coniferous forest, pebble plain, pinyon and juniper woodland, upper montane coniferous forest. Dry pine woods, gravelly knolls among sagebrush, or stony lake shores in the pine belt. 4,790–9,498 feet in elevation. Blooms May–July.
Ventura Marsh milk-vetch <i>Astragalus pycnostachyus</i> var. <i>lanosissimus</i>	FE	SE	1B.1	Marshes and swamps, coastal dunes, coastal scrub, salt marsh, wetland. Within reach of high tide or protected by barrier beaches, more rarely near seeps on sandy bluffs. 3–115 feet in elevation. Blooms June–October.
South coast saltscale <i>Atriplex pacifica</i>	–	–	1B.2	Alkali playa. Coastal scrub, coastal bluff scrub, playas, coastal dunes. Alkali soils. 3–1,312 feet in elevation. Blooms March–October.
Davidson's saltscale <i>Atriplex serenana</i> var. <i>davidsonii</i>	–	–	1B.2	Coastal bluff scrub, coastal scrub. Alkaline soil. 33–656 feet in elevation. Blooms April–October.
Malibu baccharis <i>Baccharis malibuensis</i>	–	–	1B.1	Coastal scrub, chaparral, cismontane woodland, riparian woodland. In Conejo volcanic substrates, often on exposed roadcuts. Sometimes occupies oak woodland habitat. 492–1,050 feet in elevation. Blooms August.

Species	Regulatory Status ¹			Habitat
	Federal	State	CRPR	
Southern tarplant <i>Centromadia parryi</i> ssp. <i>australis</i>	–	–	1B.1	Salt marsh, wetland. Often in disturbed sites near the coast at marsh edges; also in alkaline soils sometimes with saltgrass. Sometimes on vernal pool margins. 0–3,199 feet in elevation. Blooms May–November.
Slender-horned spineflower <i>Dodecahema leptoceras</i>	FE	SE	1B.1	Chaparral, cismontane woodland, coastal scrub. Flood deposited terraces and washes. Sandy soils. 656–2,510 feet in elevation. Blooms April–June.
Santa Monica dudleya <i>Dudleya cymosa</i> ssp. <i>ovatifolia</i>	FT	–	1B.1	Chaparral, coastal scrub. In canyons on volcanic or sedimentary substrates; primarily on north-facing slopes. 492–1,099 feet in elevation. Blooms March–June.
Southern mountain buckwheat <i>Eriogonum kennedyi</i> var. <i>austromontanum</i>	FT	–	–	Lower montane coniferous forest. Usually found in pebble plain habitats. 5,791–9,908 feet in elevation. Blooms June–September.
Vernal barley <i>Hordeum intercedens</i>	–	–	3.2	Vernal pools, dry, saline streambeds, alkaline flats. 16–3,281 feet in elevation. Blooms March–June.
Coulter's goldfields <i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	–	–	1B.1	Coastal salt marshes, playas, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 3–4,511 feet in elevation. Blooms February–June.
Payne's bush lupine <i>Lupinus paynei</i>	–	–	1B.1	Coastal scrub, riparian scrub, valley and foothill grassland. Sandy. 722–1,377 feet in elevation. Blooms March–April.
Southern curly-leaved monardella <i>Monardella sinuata</i> ssp. <i>sinuata</i>	–	–	1B.2	Coastal dunes, coastal scrub, chaparral, cismontane woodlands. Sandy soils. 0–984 feet in elevation. Blooms April–September.
San Joaquin woollythreads <i>Monolopia congdonii</i>	FE	–	1B.2	Chenopod scrub, valley and foothill grassland. Alkaline or loamy plains; sandy soils, often with grasses and within chenopod scrub. 180–2,756 feet in elevation. Blooms February–May.
Gambel's water cress <i>Nasturtium gambelii</i>	FE	ST	1B.1	Freshwater and brackish marshes at the margins of lakes and along streams, in or just above the water level. 16–1,083 feet in elevation. Blooms April–October.
Spreading navaretia <i>Navaretia fossalis</i>	FT	–	1B.1	Vernal pools, chenopod scrub, marshes and swamps, playas. San Diego hardpan and San Diego claypan vernal pools; in swales and vernal pools, often surrounded by other habitat types. 49–2,789 feet in elevation. Blooms April–June.
South coast branching phacelia <i>Phacelia ramosissima</i> var. <i>australitoralis</i>	–	–	3.2	Chaparral, coastal scrub, coastal dunes, coastal salt marsh. Sandy, sometimes rocky sites. 16–984 feet in elevation. Blooms March–August.
Hoffmann's bitter gooseberry <i>Ribes amarum</i> var. <i>hoffmannii</i>	–	–	3	Chaparral, riparian woodland. 16–3,904 feet in elevation. Blooms March–April.
California Rare Plant Rank 4 Plant Species				
Red sand-verbena <i>Abronia maritima</i>	–	–	4.2	Coastal dunes. 0–328 feet in elevation. Blooms February–November.
Heart-leaved thorn-mint <i>Acanthomintha obovata</i> ssp. <i>cordata</i>	–	–	4.2	Heavy adobe-clay soil. Grassy openings in woodland and chaparral. 2,575–5,052 feet in elevation. Blooms April–July.
Parish's oxytheca <i>Acanthoscyphus parishii</i> var. <i>parishii</i>	–	–	4.2	Chaparral, lower montane coniferous forest. Sandy or gravelly places. 4,003–8,530 feet in elevation. Blooms June–September.

Species	Regulatory Status ¹			Habitat
	Federal	State	CRPR	
Douglas' fiddleneck <i>Amsinckia douglasiana</i>	–	–	4.2	Valley and foothill grassland, oak woodland. Monterey shale; dry habitats. 0–6,398 feet in elevation. Blooms March–May.
Oval-leaved snapdragon <i>Antirrhinum ovatum</i>	–	–	4.2	From open hillsides to small vernal pools in clay or gypsum soils w/in grassland or woodland. Sites often alkaline. 656–3,281 feet in elevation. Blooms May–November.
Western spleenwort <i>Asplenium vespertinum</i>	–	–	4.2	Chaparral, cismontane woodland, coastal scrub. Rocky sites. 591–3,281 feet in elevation. Blooms February–June.
Salinas milk-vetch <i>Astragalus macrodon</i>	–	–	4.3	Chaparral, cismontane woodland, valley and foothill grassland. Open hillsides; sometimes follows burns, on bare ridges and along draws; shale, sandstone, and serpentine. 820–3,117 feet in elevation. Blooms April–July.
Plummer's baccharis <i>Baccharis plummerae</i> ssp. <i>plummerae</i>	–	–	4.3	Broadleaved upland forest, cismontane woodland, coastal scrub, chaparral. Brushy canyons and mountainsides near the sea; usually shaded north-facing slopes. Rocky substrates. 16–1,394 feet in elevation. Blooms May–October.
Brewer's calandrinia <i>Calandrinia breweri</i>	–	–	4.2	Chaparral, coastal scrub. Sandy or loamy soils. Disturbed sites, burns. 33–3,937 feet in elevation. Blooms March–June.
Catalina mariposa-lily <i>Calochortus catalinae</i>	–	–	4.2	Valley and foothill grassland, chaparral, coastal scrub, cismontane woodland. In heavy soils, open slopes, openings in brush. 49–2,297 feet in elevation. Blooms March–June.
Club-haired mariposa-lily <i>Calochortus clavatus</i> var. <i>clavatus</i>	USFS-S	–	4.3	Chaparral, cismontane woodland, valley and foothill grassland, coastal scrub. Generally, on serpentine clay, rocky soils. 246–4,265 feet in elevation. Blooms May–June.
Island mountain-mahogany <i>Cercocarpus betuloides</i> var. <i>blancheae</i>	–	–	4.3	Chaparral, closed-cone coniferous forest. 98–1,969 feet in elevation. Blooms February–May.
Seaside cistanthe <i>Cistanthe maritima</i>	–	–	4.2	Coastal bluff scrub, coastal scrub, valley and foothill grassland. Sea bluffs; sandy sites. 16–984 feet in elevation. Blooms March–June.
Monkey-flower savory <i>Clinopodium mimuloides</i>	–	–	4.2	Streambanks and mesic sites. 1,001–5,906 feet in elevation. Blooms June–October.
Unexpected larkspur <i>Delphinium inopinum</i>	USFS-S	–	4.3	Upper montane coniferous forest. On open rocky ridgetops; on metamorphics in red fir and western white pine forest. 6,201–9,186 feet in elevation. Blooms May–July.
Mt. Pinos larkspur <i>Delphinium parryi</i> ssp. <i>purpureum</i>	USFS-S	–	4.3	Pinyon-juniper woodland, Mojavean desert scrub, chaparral. 3,281–8,530 feet in elevation. Blooms May–June.
Western dichondra <i>Dichondra occidentalis</i>	–	–	4.2	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland. On sandy loam, clay, and rocky soils. 164–1,640 feet in elevation. Blooms March–July.
Small spikerush <i>Eleocharis parvula</i>	–	–	4.3	Salt marsh, Wetland. Marshes and swamps. In coastal salt marshes. 3–9,908 feet in elevation. Blooms June–August.
Elegant wild buckwheat <i>Eriogonum elegans</i>	–	–	4.3	Cismontane woodland, valley and foothill grassland. Usually in sandy or gravelly substrates; often in washes, sometimes roadsides. 656–5,003 feet in elevation. Blooms May–November.
Jepson's woolly sunflower <i>Eriophyllum jepsonii</i>	–	–	4.3	Coastal scrub, chaparral, cismontane woodland. Sometimes on serpentine. 656–3,363 feet in elevation. Blooms April–June.
Suffrutescent wallflower <i>Erysimum suffrutescens</i>	–	–	4.2	Coastal dunes, coastal scrub, coastal bluff scrub, chaparral. 0–492 feet in elevation. Blooms January–July.
Pine green-gentian <i>Frasera neglecta</i>	–	–	4.3	Lower montane coniferous forest, pinyon-juniper woodland, upper montane coniferous forest. Dry, open woodlands. 4,593–8,202 feet in elevation. Blooms May–July.
Stinkbells <i>Fritillaria agrestis</i>	–	–	4.2	Cismontane woodland, chaparral, valley and foothill grassland. Sometimes on serpentine; mostly found in nonnative grassland or in grassy openings in clay soil. 33–5,102 feet in elevation. Blooms March–June.

Species	Regulatory Status ¹			Habitat
	Federal	State	CRPR	
Pine fritillary <i>Fritillaria pinetorum</i>	–	–	4.3	Chaparral, lower montane coniferous forest, pinyon-juniper woodland, subalpine coniferous forest, upper montane coniferous forest. Granite or metamorphics. 5,692–10,827 feet in elevation. Blooms May–July.
Santa Barbara bedstraw <i>Galium clifftonsmithii</i>	–	–	4.3	Cismontane woodland. 656–4,003 feet in elevation. Blooms May–July.
Cuyama gilia <i>Gilia latiflora</i> ssp. <i>cuyamensis</i>	–	–	4.3	Pinyon and juniper woodland. Sandy flats, lower river valleys. 1,952–6,562 feet in elevation. Blooms April–June.
Pine gilia <i>Gilia leptantha</i> ssp. <i>pinetorum</i>	–	–	4.3	Lower montane coniferous forest. Rocky or sandy sites. 4,921–9,186 feet in elevation. Blooms May–July.
Urn-flowered alumroot <i>Heuchera caespitosa</i>	USFS-S	–	4.3	Lower montane coniferous forest, upper montane coniferous forest, cismontane woodland, riparian forest. Rocky sites. 3,789–8,694 feet in elevation. Blooms May–August.
San Gabriel Mountains hulsea <i>Hulsea vestita</i> ssp. <i>gabrielensis</i>	USFS-S	–	4.3	Lower montane coniferous forest, upper montane coniferous forest. Rocky sites. 4,921–8,202 feet in elevation. Blooms May–July.
Parry's hulsea <i>Hulsea vestita</i> ssp. <i>parryi</i>	–	–	4.3	Lower montane coniferous forest, upper montane coniferous forest, pinyon and juniper woodland. Rocky sites; limestone or granite; sagebrush to fir forest. 4,495–9,498 feet in elevation. Blooms April–August.
Southern California black walnut <i>Juglans californica</i>	–	–	4.2	Chaparral, coastal scrub, cismontane woodland. Slopes, canyons, alluvial habitats. 164–2,953 feet in elevation. Blooms March–August.
Southwestern spiny rush <i>Juncus acutus</i> ssp. <i>leopoldii</i>	–	–	4.2	Wetland. Salt marshes, alkaline seeps, coastal dunes. Moist saline places. 10–2,953 feet in elevation. Blooms May–June.
Ferris' goldfields <i>Lasthenia ferrisiae</i>	–	–	4.2	Vernal pools, wetland. Alkaline, clay soils. 66–2,297 feet in elevation. Blooms February–May.
Fragrant pitcher sage <i>Lepechinia fragrans</i>	USFS-S	–	4.2	Chaparral. 66–4,298 feet in elevation. Blooms March–October.
Spring lessingia <i>Lessingia tenuis</i>	–	–	4.3	Chaparral, cismontane woodland, lower montane coniferous forest. 984–7,054 feet in elevation. Blooms May–July.
Ocellated humboldt lily <i>Lilium humboldtii</i> ssp. <i>ocellatum</i>	–	–	4.2	Chaparral, coastal scrub, cismontane woodland, lower montane coniferous forest, riparian forest. Yellow-pine forest or openings, oak canyons. 98–5,906 feet in elevation. Blooms March–July.
Silky lupine <i>Lupinus elatus</i>	–	–	4.3	Lower montane coniferous forest, upper montane coniferous forest. 4,921–9,843 feet in elevation. Blooms June–August.
Dunedelion <i>Malacothrix incana</i>	–	–	4.3	Coastal dunes, coastal scrub. On flats and slopes, as well as unstabilized dunes near the ocean. 7–115 feet in elevation. Blooms January–October.
Dusky-fruited malacothrix <i>Malacothrix phaeocarpa</i>	–	–	4.3	Closed-cone coniferous forest, chaparral. Openings, burned, or disturbed areas. 328–4,593 feet in elevation. Blooms April–June.
Cliff malacothrix <i>Malacothrix saxatilis</i> var. <i>saxatilis</i>	–	–	4.2	Coastal bluff scrub, coastal scrub. 10–656 feet in elevation. Blooms March–September.
California spineflower <i>Mucronea californica</i>	–	–	4.2	Chaparral, cismontane woodland, coastal dunes, coastal scrub, valley and foothill grassland. Sandy soils. 0–4,593 feet in elevation. Blooms March–July.

Species	Regulatory Status ¹			Habitat
	Federal	State	CRPR	
Fragile pentachaeta <i>Pentachaeta fragilis</i>	–	–	4.3	Chaparral, lower montane coniferous forest. Sandy soils. 148–6,890 feet in elevation. Blooms March–June.
Adobe yampah <i>Perideridia pringlei</i>	–	–	4.3	Chaparral, cismontane woodland, pinyon and juniper woodland, coastal scrub. Serpentine, clay soils. Grassland hillsides; seasonally wet sites. 984–5,906 feet in elevation. Blooms April–June.
Transverse Range phacelia <i>Phacelia exilis</i>	–	–	4.3	Meadows and seeps, lower montane coniferous forest, upper montane coniferous forest, pebble plain. Sandy or rocky slopes, flats, meadows. 3,609–8,858 feet in elevation. Blooms May–August.
Hubby's phacelia <i>Phacelia hubbyi</i>	–	–	4.2	Chaparral, coastal scrub, valley and foothill grassland. Gravelly, rocky areas and talus slopes. 0–3,281 feet in elevation. Blooms April–July.
Mojave phacelia <i>Phacelia mohavensis</i>	–	–	4.3	Cismontane woodland, lower montane coniferous forest, dry meadows, pinyon-juniper woodland. Sandy or gravelly soils, dry streambeds. 4,593–8,202 feet in elevation. Blooms April–August.
Chaparral rein orchid <i>Piperia cooperi</i>	–	–	4.2	Chaparral, cismontane woodland, valley and foothill grassland. 49–607 feet in elevation. Blooms March–June.
Michael's rein orchid <i>Piperia michaelii</i>	–	–	4.2	Coastal bluff scrub, coastal scrub, cismontane woodland, chaparral, closed-cone coniferous forest, lower montane coniferous forest. Mudstone and humus, generally dry sites. 10–3,002 feet in elevation. Blooms April–August.
Fish's milkwort <i>Polygala cornuta</i> var. <i>fishiae</i>	–	–	4.3	Cismontane woodland, riparian woodland, chaparral. Scree slopes, brushy ridges, and along creeks; often with oaks. 328–3,281 feet in elevation. Blooms May–August.
Chickweed oxytheca <i>Sidotheca caryophylloides</i>	USFS-S	–	4.3	Lower montane coniferous forest. Sandy sites. 3,658–8,530 feet in elevation. Blooms July–September.
San Diego County needle grass <i>Stipa diegoensis</i>	–	–	4.2	Chaparral, coastal scrub. Rocky slopes, sea cliffs and stream banks; often in mesic sites. 33–2,625 feet in elevation. Blooms February–June.
Woolly seablite <i>Suaeda taxifolia</i>	–	–	4.2	Wetland. Coastal bluff scrub, coastal dunes, marshes and swamps. Margins of salt marshes. 0–164 feet in elevation. Blooms January–December.
Lemmon's syntrichopappus <i>Syntrichopappus lemmonii</i>	–	–	4.3	Chaparral, Joshua tree woodland, pinyon and juniper woodland. Decomposed granite; sandy or gravelly soils. 1,640–6,004 feet in elevation. Blooms April–May.
Silvery false lupine <i>Thermopsis californica</i> var. <i>argentata</i>	–	–	4.3	Lower montane coniferous forest, pinyon-juniper woodland. 2,182–5,233 feet in elevation. Blooms April–October.

Notes: CRPR = California Rare Plant Rank.

¹ Legal Status Definitions

Federal:

FE Federally Listed as Endangered (legally protected by ESA)

FT Federally Listed as Threatened (legally protected by ESA)

USFS-S U.S. Forest Service Sensitive

State:

SE State Listed as Endangered (legally protected by CESA)

California Rare Plant Ranks:

1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under the ESA or CESA)

3 Lacking the necessary information to assign the plant species to one of the other ranks or to reject them.

4 Plant species of limited distribution or infrequent throughout a broader area in California.

Threat Ranks:

0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)

0.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)

0.3 Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

Sources: CNDDB 2019; CNPS 2019; USFWS 2019

Special-Status Wildlife

The Background Report contains special-status wildlife species occurrence data based partly on a 2016 review of the CNDDDB (Section 8.2, “Biological Resources,” of Appendix B). Based on an updated review of the CNDDDB and the USFWS Information for Planning and Consultation database, there are 10 additional special-status wildlife species that are known or have potential to occur in the county (Table 4.4-2) (CNDDDB 2019). Additionally, the regulatory status of three species has changed since completion of the Background Report. Tricolored blackbird (*Agelaius tricolor*) is now listed as threatened under CESA, crotch bumble bee (*Bombus crotchii*) is now a candidate for listing under CESA, and Townsend’s big-eared bat (*Corynorhinus townsendii*) is no longer a candidate for listing under CESA (Table 4.4-2).

Table 4.4-2 Additional Special-Status Wildlife Species Known of with Potential to Occur in Ventura County and Recent Status Changes

Species	Regulatory Status ¹		Habitat
	Federal	State	
California glossy snake <i>Arizona elegans occidentalis</i>	–	SSC	Patchily distributed from the eastern portion of San Francisco bay, southern San Joaquin Valley, and the Coast, Transverse, and Peninsular Ranges south to Baja California. Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils.
Northern California legless lizard <i>Anniella pulchra</i>	USFS-S	SSC	Chaparral, coastal dunes, and coastal scrub. Sandy or loose loamy soils under sparse vegetation. Soil moisture is essential. They prefer soils with a high moisture content.
Southern California legless lizard <i>Anniella stebbinsi</i>	USFS-S	SSC	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally in moist, loose soil. They prefer soils with a high moisture content.
Ringtail <i>Bassariscus astutus</i>	–	FP	Riparian habitats, forest habitats, and shrub habitats in lower to middle elevations. Usually found within 0.6 mile of a permanent water source.
Green sea turtle <i>Chelonia mydas</i>	FT	–	Marine. Completely herbivorous; requires adequate supply of seagrasses and algae.
Giant kangaroo rat <i>Dipodomys ingens</i>	FE	SE	Annual grasslands on the western side of the San Joaquin Valley, marginal habitat in alkali scrub. Need level terrain and sandy loam soils for burrowing.
American peregrine falcon <i>Falco peregrinus anatum</i>	FD	SD FP	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.
California black rail <i>Laterallus jamaicensis coturniculus</i>	–	ST FP	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.
Foothill yellow-legged frog <i>Rana boylei</i>	USFS-S	SC SSC	Partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egg-laying. Need at least 15 weeks to attain metamorphosis.
San Joaquin kit fox <i>Vulpes macrotis mutica</i>	FE	ST	Annual grasslands or grassy open stages with scattered shrubby vegetation. Need loose-textured sandy soils for burrowing, and suitable prey base.
Recent Status Changes			
Tricolored blackbird <i>Agelaius tricolor</i>	–	ST SSC	Freshwater marsh, marsh and swamp, swamp, wetland. Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.

Species	Regulatory Status ¹		Habitat
	Federal	State	
Crotch bumblebee <i>Bombus crotchii</i>	–	SC	Coastal California east to the Sierra-Cascade crest and south into Mexico.
Townsend's big-eared bat <i>Corynorhinus townsendii</i>	USFS-S	SSC	Broadleaved upland forest, chaparral, chenopod scrub, Great Basin grassland, Great Basin scrub, Joshua tree woodland, lower montane coniferous forest, meadow & seep, Mojavean desert scrub, riparian forest, riparian woodland, Sonoran desert scrub. Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.

Notes: CNDDDB = California Natural Diversity Database.

¹. Legal Status Definitions

Federal:

FE Endangered (legally protected)

FT Threatened (legally protected)

FD Delisted

USFS-S U.S. Forest Service Sensitive

State:

FP Fully protected (legally protected)

SSC Species of special concern (no formal protection other than CEQA consideration)

SE Endangered (legally protected)

ST Threatened (legally protected)

SD Delisted

SC Candidate (legally protected)

Sources: CNDDDB 2019; USFWS 2019

Sensitive Natural Communities

The January 2020 Background Report contains a discussion regarding vegetation communities and land cover types (Section 8.2, “Biological Resources”, Appendix B), including sensitive habitats. Sensitive habitats may be of special concern to regulatory agencies and conservation organizations for a variety of reasons, including their locally or regionally declining status, or because they provide important habitat to common and special-status species. Sensitive habitat types include those that are of special concern to the California Department of Fish and Wildlife (CDFW) or that are afforded specific consideration through CEQA, Section 1602 of the California Fish and Game Code, the Porter-Cologne Water Quality Control Act, and Section 404 of the Clean Water Act. Several of these sensitive habitats were considered in the Background Report.

CDFW maintains a list of plant communities that are native to California. Within that list, CDFW identifies special-status plant communities (i.e., sensitive natural communities), which it defines as communities that are of limited distribution Statewide or within a county or region and are often vulnerable to environmental effects of projects. These communities may or may not contain special-status species or their habitat. Known occurrences of sensitive natural communities are included in the CNDDDB; however, no new occurrences have been added to the CNDDDB since the mid-1990s when funding was cut for this portion of the CNDDDB program. The sensitive natural communities included in the CNDDDB are based on the Holland 1986 classification which is not consistent with the State’s current vegetation mapping and classification standards and this legacy data is currently being validated by CDFW. Nonetheless, CDFW recommends that the existence of these legacy records should be addressed in the environmental review processes of CEQA. Twenty-two sensitive natural communities were reported in the CNDDDB legacy data and occur within Ventura County in addition to the sensitive habitats discussed in the Background Report (Table 4.4-3).

Table 4.4-3 Additional Sensitive Natural Communities Known to Occur in Ventura County

Sensitive Natural Community	Description
Southern California Coastal Lagoon	Southern California coastal lagoons are shallow inland water bodies, separated from the ocean by a barrier, and are typically associated with transitional zones between river mouths and the ocean.
Southern California Steelhead Stream	Southern California steelhead streams provide suitable habitat for the Southern California DPS steelhead (<i>Oncorhynchus mykiss irideus</i>).
Southern California Threespine Stickleback Stream	Southern California threespine stickleback streams provide suitable habitat for the threespine stickleback (<i>Gasterosteus aculeatus</i>).
Southern Foredunes	Southern foredunes habitat are located along sandy beaches and are associated with perennial, woody plant species.
Southern Dune Scrub	Southern dune scrub habitat is associated with coastal areas and contains scattered shrubs, subshrubs, and herbaceous vegetation. Characteristic species include saltbush (<i>Atriplex</i> spp.), goldenbush (<i>Isocoma</i> spp.), and lupine (<i>Lupinus</i> spp.).
Southern Coastal Bluff Scrub	Southern coastal bluff scrub habitat occurs on headlands and uplands.
Maritime Succulent Scrub	Maritime succulent scrub habitat contains features of coastal scrub habitat with the addition of succulent species, including <i>Dudleya</i> spp. and prickly pear (<i>Opuntia</i> spp.). In Ventura County, this habitat is only known to occur on Anacapa Island, which is outside of the plan area of the 2040 General Plan.
Valley Needlegrass Grassland	Valley needlegrass grassland is associated with two needlegrass species: purple needle grass (<i>Stipa pulchra</i>) and nodding needle grass (<i>Stipa cernua</i>).
Southern Coastal Salt Marsh	Southern coastal saltmarsh habitat contains wetlands associated with plant species such as pickleweed (<i>Salicornia</i> spp.), Pacific cordgrass (<i>Spartina foliosa</i>), and bird's beak (<i>Cordylanthus</i> spp.).
Cismontane Alkali Marsh	Cismontane alkali marsh habitat contains wetlands dominated by low, perennial, herbaceous plants adapted to wetlands.
Coastal and Valley Freshwater Marsh	Coastal and valley freshwater marsh habitat contains wetland habitat, typically around the margins of lakes, streams, and seeps. This habitat is typically dominated by cattail (<i>Typha</i> spp.), sedge (<i>Carex</i> spp.), and bulrush (<i>Scirpus</i> spp.).
Southern Riparian Forest	Southern riparian forest habitat includes a closed canopy overstory of Fremont cottonwood (<i>Populus fremontii</i>), black cottonwood (<i>Populus trichocarpa</i>), western sycamore (<i>Platanus racemosa</i>), and willow (<i>Salix</i> spp.) and an understory of mule fat (<i>Baccharis viminea</i>) and willow baccharis (<i>Baccharis salicina</i>).
Southern Coast Live Oak Riparian Forest	Southern coast live oak riparian forest includes a dense riparian forest near streams dominated by coast live oak (<i>Quercus agrifolia</i>) with an herbaceous understory.
Southern Cottonwood Willow Riparian Forest	Southern cottonwood willow riparian forest habitat is similar to southern riparian forest and is dominated by cottonwoods and willows.
Southern Mixed Riparian Forest	Southern mixed riparian forest is similar to southern riparian forest, but also contains coast live oak.
Canyon Live Oak Ravine Forest	Canyon live oak ravine forest habitat is a riparian forest habitat, dominated by various oak species (<i>Quercus</i> spp.), and may include other tree species including big leaf maple (<i>Acer macrophyllum</i>), and California bay (<i>Umbellularia californica</i>).
Southern Sycamore Alder Riparian Woodland	Southern sycamore alder riparian forest contains an overstory of primarily California sycamore (<i>Platanus racemosa</i>) and a dense understory of salt marsh baccharis (<i>Baccharis douglasii</i>) and willow.
Southern Riparian Scrub	Southern riparian scrub habitat typically contains an open overstory of coast live oak and is dominated by shrub species including California sagebrush (<i>Artemisia californica</i>), black sage (<i>Salvia leucophylla</i>), and white sage (<i>Salvia apiana</i>).

Sensitive Natural Community	Description
Southern Willow Scrub	Southern willow scrub habitat is dominated by various willow species and also may include Fremont cottonwood and California sycamore. This habitat is often associated with major rivers in southern California.
Valley Oak Woodland	Valley oak woodland habitat is dominated by valley oak (<i>Quercus lobata</i>) and is frequently associated with riparian habitat.
California Walnut Woodland	California walnut (<i>Juglans californica</i>) woodland habitat contains California walnut, coast live oak, and California sagebrush (<i>Artemisia californica</i>).
Walnut Forest	Walnut forest habitat contains similar species assemblages as California walnut woodland, while forming a closed canopy.

Note: CNDDDB = California Natural Diversity Database.

Source: CNDDDB 2019

Native Wildlife Nursery Sites

The Background Report (Section 8.2, “Biological Resources,” Appendix B) does not contain a discussion regarding native wildlife nursery sites which are included in Appendix G question IV.b. Nursery sites are locations where fish and wildlife concentrate for hatching and/or raising young, such as nesting rookeries for birds, spawning areas for native fish, fawning areas for deer, monarch overwintering sites, and maternal roosts for bats. Nursery sites are considered for native wildlife that are not defined and otherwise considered under CEQA as special-status species. The county could contain a variety of wildlife nursery sites. Native nursery sites are not mapped for the plan area and would need to be identified and evaluated at a project-specific level.

4.4.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

This program-level analysis identifies the potential impacts of implementation of the 2040 General Plan on biological resources. To perform this analysis, the following existing data sources were reviewed to determine the known distribution of biological resources: the Background Report; the County’s aerial imagery and other relevant biological GIS data layers such as wetlands, waterbodies, vegetation, habitat connectivity and wildlife corridors; and updated CNDDDB, CNPS Inventory of Rare and Endangered Plants of California database, and USFWS Information for Planning and Consultation database search results (CNDDDB 2019; CNPS 2019; USFWS 2019).

The analysis evaluates potential biological resources impacts based on the future development that could occur as a result of 2040 General Plan implementation. The relative location of future development is then compared to known special-status species ranges; known occurrences of special-status species and habitats; known locations of sensitive habitats, including sensitive natural communities, riparian habitat, and waters of the United States and State; wildlife movement corridors; and wildlife nursery sites (e.g., heron rookeries, deer fawning areas, monarch butterfly overwintering areas, bat roosts). The analysis evaluates the ability of 2040 General Plan policies and implementation programs to avoid or substantially reduce adverse impacts on biological resources.

Impacts evaluated include permanent and temporary and direct and indirect impacts resulting from future development under the 2040 General Plan. Future development would involve construction activities such as ground disturbance, grading, vegetation removal, placement of new structures and roads, and potentially increased human activity. These activities could result in the direct loss or injury of special-status species or loss or degradation of sensitive habitats if present within the footprint of a given project. Implementation of the 2040 General Plan could also result in conversion of special-status species habitat, potentially resulting in indirect impacts (i.e., physical changes in the environment which are not immediately related to a project, but which are caused indirectly by a project) on special-status species, wildlife corridors, and native wildlife nursery sites, including displacement of wildlife species from occupied habitat, special-status species habitat fragmentation and edge effects, introduction of invasive nonnative plant or wildlife species, increased or polluted water runoff, increased levels of noise or nighttime lighting, alteration of stream flow characteristics or fire cycles, and increased human activity as a result of increased development intensity.

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on the County’s adopted Initial Study Assessment Guidelines (ISAG), which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project’s impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, the ISAG Sections 4.D.2a, 4.D.2c, 9D.1, and 9D.2 regarding sensitive plant communities, Environmentally Sensitive Habitat Areas (ESHA), coastal beaches, and sand dunes were combined in order to reduce repetition. Additionally, riparian habitat and other sensitive natural communities were added to this threshold. While riparian habitat and sensitive natural communities likely fall into the category of sensitive plant communities, these habitats have been explicitly identified for consistency with Appendix G question IV.b.

ISAG Section 4.D.3 regarding native resident or migratory fish or wildlife species and established native resident or migratory wildlife corridors was edited to include native wildlife nursery sites to reflect Appendix G, question IV.d. Two thresholds not included in ISAG were added for consistency with Appendix G, Section IV.e and IV.f, regarding consistency with local policies or ordinances protecting biological resources and Habitat Conservation Plans and Natural Community Conservation Plans.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant biological resources impact if it would:

- ▶ Reduce a plant or animal species’ population, reduce a plant or animal species’ habitat (including roosting sites), increase habitat fragmentation, or restrict reproductive capacity.

The following types of impacts on plant and animal species or their habitats are considered potentially significant:

- Loss of one or more individuals, occupied habitat, or critical habitat designated by the USFWS, of a species officially listed as Endangered, Threatened, or Rare under the federal ESA or CESA, a Candidate species, or a California fully protected species.
 - Impacts that would eliminate or threaten to eliminate one or more element occurrences of a special-status species not otherwise listed under the ESA or CESA, or as a Candidate species or California fully protected species.
 - Impacts that would threaten the viability of a habitat that sustains a population of a special-status wildlife species.
 - Impacts that would restrict the reproductive capacity of a special-status species.
 - “Take” of birds protected under the California Fish and Game Code and the federal Migratory Bird Treaty Act (MBTA), as “take” is defined in the California Fish and Game Code and MBTA.
 - Increases in noise and/or nighttime lighting to a level above ambient levels that would adversely affect a special-status species.
 - Increases in human access, predation or competition from domestic animals, pests or exotic species, or other indirect impacts, to levels that would adversely affect special-status species.
 - Impacts severe enough to substantially reduce the habitat of a wildlife species or cause a wildlife population to decline substantially or drop below self-sustaining levels, pursuant to Section 15065 of the CEQA Guidelines, Mandatory Findings of Significance.
- Have a substantial adverse effect on any riparian habitat, sensitive plant community, coastal ESHA, or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS through the following actions:
- Construction, grading, clearing, or other activities that would temporarily or permanently remove riparian habitat, sensitive plant communities, ESHA, or other sensitive natural communities; or disturb ESHA buffers (ESHA buffers are within 100 feet of the boundary of ESHA as defined in Section 8172-1 of the Coastal Zoning Ordinance). Temporary impacts on sensitive plant communities would be considered significant unless the habitat is restored once the temporary impact is complete.
 - Indirect impacts resulting from project operation at levels that would degrade the health of riparian habitat, a sensitive plant community, ESHA, or other sensitive natural community.
 - Any project that causes a direct or indirect adverse physical change to a coastal beach or sand dune, which is inconsistent with any of the coastal beaches and coastal sand dunes policies of the California Coastal Act, corresponding Coastal Act regulations, Ventura County Coastal Area Plan, or the Ventura County General Plan Goals, Policies and Programs, will be considered to result in a significant environmental impact.

- ▶ Have a substantial adverse effect on wetlands and other waters (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Adverse effects would include impacts to the entire aquatic or wetland ecosystem and impacts within the watershed that would adversely affect the aquatic or wetland ecosystem. The following types of impacts on wetlands and other waters are considered potentially significant:
 - Any of the following activities: removal of vegetation; grading; obstruction or diversion of water flow; change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; or any disturbance of the substratum.
 - Disruptions to wetland or riparian plant communities that would isolate or substantially interrupt contiguous habitats, block seed dispersal routes, or increase vulnerability of wetland species to exotic weed invasion or local extirpation. An example would be disruption of adjacent upland vegetation to a level that would adversely affect the ecological function of the wetland, such as where such vegetation plays a critical role in supporting riparian-dependent wildlife species (e.g., amphibians), or where such vegetation aids in stabilizing steep slopes adjacent to the riparian habitat, which reduces erosion and sedimentation potential.
 - Interference with ongoing maintenance of hydrological conditions in a water or wetland. The hydrology of wetlands systems must be maintained if their function and values are to be preserved. Adverse hydrological changes might include altered freshwater input; changes in the watershed area or run-off quantity, quality, or velocity; drawing down of the groundwater table to the detriment of groundwater-dependent habitat; substantial increases in sedimentation; introduction of toxic elements or alteration of ambient water temperature.
 - The project does not provide an adequate buffer for protecting the functions and values of existing waters or wetlands. The buffer is measured from the top-of-bank or edge of wetland or riparian habitat, whichever is greater.
- ▶ Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites through removal of habitat within a wildlife movement corridor; isolation of habitat; construction or creation of barriers that impede fish or wildlife movement, migration, or long-term connectivity; or intimidation of fish or wildlife via the introduction of noise, light, development or increased human presence. The following types of impacts on habitat connectivity are considered potentially significant:
 - A habitat connectivity feature (e.g., linkage, corridor, chokepoint, stepping stone) would be severed, substantially interfered with, or potentially blocked.
 - Wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction would be prevented or substantially interfered with.
 - Wildlife would be forced to use routes that endanger their survival. For example, constraining a corridor for mule deer (*Odocoileus hemionus*) or mountain lion (*Puma*

concolor) to an area that is not well-vegetated or that runs along a road instead of through a stream corridor or along a ridgeline.

- Lighting, noise, domestic animals, or other indirect impacts that could hinder or discourage fish and/or wildlife movement within habitat connectivity feature would be introduced.
 - The width of linkage, corridor, or chokepoint would be reduced to less than the sufficient width for movement of the target species (the species relying upon the connectivity feature). The adequacy of the width shall be based on the biological information for the target species; the quality of the habitat within and adjacent to the linkage, corridor, or chokepoint; topography; and adjacent land uses.
 - For wildlife relying on visual cues for movement, visual continuity (i.e., lines-of-sight) across highly constrained wildlife corridors, such as highway crossing structures or stepping stones, would not be maintained.
- ▶ Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
 - ▶ Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

ISSUES NOT DISCUSSED FURTHER

Consistency with Adopted Habitat Conservation Plans

No habitat conservation plans or natural community conservation plans have been adopted within the plan area of the 2040 General Plan. This issue is not discussed further.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to biological resources and, specifically, the thresholds of significance identified above, include the following.

Conservation and Open Space Element

- ▶ **Policy COS-1.1: Protection of Sensitive Biological Resources.** The County shall ensure that discretionary development that could potentially impact sensitive biological resources be evaluated by a qualified biologist to assess impacts and, if necessary, develop mitigation measures that fully account for the impacted resource. When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts. If the impacts cannot be reduced to a less than significant level, findings of overriding considerations must be made by the decision-making body. (MPSP, IGC, RDR) *[Source: Existing GPP Policy 1.5.2.1 and 1.5.2.2 modified]*
- ▶ **Policy COS-1.2: Consideration of Sensitive Biological Resources.** The County shall identify sensitive biological resources as part of any land use designation change to the General Plan Land Use Diagram or zone designation change to the Zoning Ordinance that would intensify the uses in a given area. The County shall prioritize conservation of areas with sensitive biological resources. (MPSP) *[Source: New Policy]*

- ▶ **Policy COS-1.3: Wildlife Corridor Crossing Structures.** Based on the review and recommendation of a qualified biologist, the design and maintenance of road and floodplain improvements, including culverts and bridges, shall incorporate all feasible measures to accommodate wildlife passage. (RDR, MPSP) *[Source: Existing GPP Policy 1.5.2.6, modified pursuant to Wildlife Corridor Policy 3/19/19]*
- ▶ **Policy COS-1.4: Consideration of Impacts to Wildlife Movement.** When considering proposed discretionary development, County decision-makers shall consider the development's potential project-specific and cumulative impacts on the movement of wildlife at a range of spatial scales including local scales (e.g., hundreds of feet) and regional scales (e.g., tens of miles). (RDR) *[Source: Wildlife Corridor Policy 3/19/19]*
- ▶ **Policy COS-1.5: Development within Habitat Connectivity and Wildlife Corridors.** Development within the Habitat Connectivity and Wildlife Corridors overlay zone and Critical Wildlife Passage Areas overlay zone shall be subject to the applicable provisions and standards of these overlay zones as set forth in the Non-Coastal Zoning Ordinance. (RDR) *[Source: Existing GPP Policy 1.5.2.8; Wildlife Corridor Policy 3/19/19]*
- ▶ **Policy COS-1.6: Discretionary Development on Hillsides and Slopes.** The County shall require discretionary development on hillsides and slopes, which have an average natural slope of 20 percent or greater in the area where the proposed development would occur, to be sited and designed in a manner that will minimize grading, alteration of natural land forms, and vegetation removal to avoid significant impacts to sensitive biological resources to the extent feasible. (RDR, MPSP) *[Source: New Policy]*
- ▶ **Policy COS-1.7: Balancing Resource Preservation and Flood Protection.** The County shall require that discretionary development and County-initiated projects balance the preservation of streams, wetlands, and riparian habitats with the need to adequately protect public safety and property from flooding hazards by incorporating natural or nature-based flood control infrastructure, (e.g., wetland restoration, soil conservation, vegetated levees), when feasible. (MPSP) *[Source: Existing Ojai Valley Area Plan Goal 1.4.1.2, modified]*
- ▶ **Policy COS-1.8: Bridge Crossing Design.** The County shall require discretionary development that includes new or modified road crossings over streams, wetlands and riparian habitats to include bridging design features with bridge columns located outside the riparian habitat areas, when feasible. (RDR) *[Source: New Policy]*
- ▶ **Policy COS-1.9: Agency Consultation Regarding Biological Resources.** The County shall consult with the California Department of Fish and Wildlife, the Regional Water Quality Control Board, the U.S. Fish and Wildlife Service, National Audubon Society, California Native Plant Society, National Park Service for development in the Santa Monica Mountains or Oak Park Area, and other resource management agencies, as applicable during the review of discretionary development applications, to ensure that impacts to biological resources, including rare, threatened, or endangered species, are avoided or minimized. (MPSP, IGC, RDR) *[Source: Existing GPP Policy 1.5.2.5, modified]*
- ▶ **Policy COS-1.10: Evaluation of Potential Impacts of Discretionary Development on Wetlands.** The County shall require discretionary development that is proposed to be located within 300 feet of a wetland to be evaluated by a County-approved biologist for potential impacts on the wetland and its associated habitats pursuant to the applicable provisions of

the County's Initial Study Assessment Guidelines. (RDR) *[Source: Existing GPP Policy 1.5.2.3 modified]*

- ▶ **Policy COS-1.11: Discretionary Development Sited Near Wetlands.** The County shall require discretionary development to be sited 100 feet from wetland habitats, except as provided below. The 100-foot setback may be increased or decreased based upon an evaluation and recommendation by a qualified biologist and approval by the decision-making body based on factors that include, but may not be limited to soil type, slope stability, drainage patterns, the potential for discharges that may impair water quality, presence or absence of endangered, threatened or rare plants or animals, direct and indirect effects to wildlife movement, and compatibility of the proposed development with use of the wetland habitat area by wildlife. Discretionary development that would have a significant impact on a wetland habitat shall be prohibited unless mitigation measures are approved that would reduce the impact to a less than significant level. Notwithstanding the foregoing, discretionary development that would have a significant impact on a wetland habitat on land within a designated Existing Community may be approved in conjunction with the adoption of a statement of overriding considerations by the decision-making body. (RDR) *[Source: Existing GPP Policies 1.5.2.3 and 1.5.2.4, modified]*
- ▶ **Policy COS-1.12: Discretionary Development and Landscaping.** The County shall require landscaping associated with discretionary development, or subject to the California Water Efficient Landscape Ordinance (WELo), to be water-efficient and include native, pollinator-friendly plants consistent with WELo guidelines, as applicable. The planting of invasive and watch list plants as inventoried by the California Invasive Plant Council shall be prohibited, unless planted as a commercial agricultural crop or grown as commercial nursery stock. (RDR) *[Source: New Policy]*
- ▶ **Policy COS-1.13: Partnerships for Protection of Natural and Biological Resources.** The County shall continue to work in partnership with agencies, organizations, and entities responsible for the protection, management, and enhancement of the county's biological resources. (IGC) *[Source: Existing GPP Goal 1.1.1.3, modified]*
- ▶ **Policy COS-1.14: Ecological Information Programs.** The County shall support programs that encourage awareness and respect for the natural environment. (PI) *[Source: New Policy]*
- ▶ **Policy COS-1.15: Countywide Tree Planting.** The County shall establish and support a countywide target for the County, cities in Ventura County, agencies, organizations, businesses, and citizens to plant two million trees throughout the county by 2040. (SO, JP, IGC) *[New Policy]*
- ▶ **Policy COS-2.1: Beach Erosion.** The County shall strive to minimize the risk from the damaging effects of coastal wave hazards and beach erosion and reduce the rate of beach erosion. (MPSP, RDR, IGC) *[Source: Existing GPP Goal 2.12.1.1 and 2.12.1.2, combined]*
- ▶ **Policy COS-2.2: Beach Nourishment.** The County shall support activities that trap or add sand through beach nourishment, dune restoration, and other adaptation strategies to enhance or create beaches in areas susceptible to sea-level rise and coastal flooding. (MPSP) *[Source: New Policy]*

- ▶ **Policy COS-2.4: Mining Activities.** The County shall require discretionary development for all mining activities in County streams and rivers to incorporate all feasible measures to mitigate beach sand replenishment impacts. (RDR) *[Source: Existing GPP Policy 1.10.2.4, modified]*
- ▶ **Policy COS-2.5: Shoreline Protective Structure Design.** The County shall require all shoreline protective structures which alter natural shoreline processes to be designed to eliminate or mitigate adverse impacts on local shoreline sand supplies. (MPSP, IGC) *[Source: Existing GPP Policy 1.10.2.3]*
- ▶ **Policy COS-2.8: Coastal Fisheries.** The County shall encourage community programs that are designed to improve the quality of coastal fisheries and marine resources (PSR, IGC) *[Source: New Policy]*
- ▶ **Policy COS-2.9: Estuarine Protections.** The County shall support efforts by other agencies and organizations to maintain and enhance estuarine systems in order to protect and enhance coastal fisheries and other marine resources. (PSR, IGC) *[Source: New Policy]*
- ▶ **Policy COS-2.10: Saltwater Intrusion.** The County shall work with Federal, State, and local jurisdictions, agencies, and organizations to monitor saltwater intrusion and take proactive steps to reduce intrusion, including:
 - working to maintain and restore coastal wetlands buffers;
 - enhancing groundwater management to prevent excessive pumping in order to restore groundwater levels needed to reduce saltwater intrusion; and
 - implementing mitigation measures to prevent saltwater intrusion into estuaries and groundwater basins including, but not limited to, implementation of reactive barriers and use of pumps to divert saltwater.

(PSR, IGC, JP) *[Source: New Policy, OPR Sea-Level Rise Guidance]*

- ▶ **Policy COS-2.11: Dune Vegetation.** Discretionary development which would result in the removal of dune vegetation shall be conditioned to replace the vegetation. (RDR) *[Source: Existing GPP Policy 1.10.2.2]*
- ▶ **Policy COS 9.3: Open Space Preservation.** The County shall place a high priority on preserving open space lands for recreation, habitat protection, wildlife movement, flood hazard management, public safety, water resource protection, and overall community benefit. (PSP) *[Source: New Policy]*

Implementation Programs

- ▶ **Program A: Standards for Compact Development.** The County shall update the Non-Coastal Zoning Ordinance to include development standards for project design that features compact development adjacent to scenic or sensitive biological resources. *[Source: New Program]*
- ▶ **Program B: Update Initial Study Assessment Guidelines.** The County shall update the Initial Study Assessment Guidelines to identify a range of mitigation measures for protected biological resources. This will include updating Section 4, Biological Resources, to include

the following California Environmental Quality Act (CEQA) policy language regarding compensatory mitigation: “When there is no other feasible alternative to avoiding an impact to a wetland habitat, the County shall require the discretionary development to provide restoration and/or replacement habitat as compensatory mitigation such that no overall net loss of wetland habitat results from the development. The restoration and/or replacement habitat shall be ‘in kind’ (i.e. same type and acreage) and provide wetland habitat of comparable biological value. On-site restoration and/or replacement shall be preferred wherever possible. A habitat restoration and/or replacement plan to describe and implement such compensatory mitigation shall be developed in consultation with all agencies that have jurisdiction over the resource.” *[Source: Existing GPP Policy 1.5.2.4, modified]*

- ▶ **Program C: Update Tree Protection Ordinance.** The County shall update existing Tree Protection Regulations in the Non-Coastal Zoning Ordinance to further enhance conservation of our urban forests and the preservation of the County’s oak woodland resources. Updates shall include incorporation of Board-adopted recommendations from the Ventura County Oak Woodlands Management Plan (2007), which include tree replacement offsets for ministerial development projects that remove protected trees, revisiting mitigation ratios for tree removal and oak woodland impacts for discretionary development projects. The update shall also evaluate existing protections for invasive, non-native trees and consider the degree to which they provide habitat for a species during critical life stages (e.g., colonial roost sites, breeding sites, etc.). In addition, the evaluation shall also include anticipated effects of climate change on the urban forest environment *[Source: New Program]*
- ▶ **Program D: Research Feasibility of Updating Vegetation Maps.** In partnership with other natural resource agencies and organizations, the County shall explore the feasibility of updating vegetation maps for unincorporated areas to facilitate the accurate analysis of potential impacts of development on vegetation communities and other sensitive biological resources. If necessary, the County shall develop or modify regulations and development standards to ensure adequate protections for vegetation communities. *[Source: New Program]*
- ▶ **Program E: Update Non-Coastal Zoning Ordinance Standards for Vegetation Communities.** Based on the results of Implementation Program COS-D, (updated vegetation mapping), the County shall develop or modify regulations and development standards to ensure adequate protections for vegetation mapping, if necessary.
- ▶ **Program F: Evaluate Increase to Standard Setback from Wetland.** The County shall evaluate whether a standard 200-foot setback from wetlands should apply to development in order to improve water quality, reduce the impacts of flooding and provide adequate protection for sensitive biological resources *[Source: New Program]*
- ▶ **Program G: Identification of Critical Habitats.** The County shall continue to partner with state and federal agencies to identify those areas of the County that are considered to be critical habitats of endangered, threatened or rare species as well as for other significant biological resources. *[Source: Existing GPP Program 1.5.3.1, modified]*
- ▶ **Program H: County Tree Planting Program.** The County shall plant at least one thousand trees annually on County property. *[Source: New Program]*

Coastal Area Plan Policies

► **Section 30240 Environmentally Sensitive Habitat Areas, Adjacent Developments:**

- ESHA shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.
- Development in areas adjacent to ESHA and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Oak Park Area Plan

- **Policy 1.3.2.2:** Discretionary development shall be located to avoid the loss or damage to healthy mature trees and sensitive plant species, including: Catalina Mariposa Lily, Wind Poppy and Santa Susana Tar Plant and other rare or endangered species.
- **Policy 1.3.2.3:** Where applicable, developers shall be required to submit an updated Oak Tree Report, covering all oaks located within 50 feet of any proposed grading or construction. Trees, along with identifying number, health and aesthetic grades, shall be shown on the grading plan.
- **Policy 1.3.2.4:** All discretionary development shall comply with the oak tree preservation and mitigation requirements of the adopted Oak Park Development Plans.

Ojai Valley Area Plan

- **Policy 1.4.2.7:** Discretionary development which would result in a significant adverse impact to a Locally Important Plant Community shall be required to replace such Locally Important Plant Community proposed for removal on at least a 1:1 basis and will be required to monitor the success of such planting for a minimum of seven years. In lieu of replacement, developers may dedicate without compensation, acreage containing such Locally Important Plant Community to a government agency or non-profit organization (e.g., a homeowners' association, a land conservancy) provided such entity will provide assurances that the dedicated Locally Important Plant Community acreage will be retained in a permanent undeveloped state. Such dedicated lands shall be at least two times the acreage of the Locally Important Plant Community which is proposed for removal. The form of such dedication may be fee title, conservation easement or other instrument approved by the County.

Lake Sherwood/Hidden Valley Area Plan

- **Policy 2.1.2.8:** No blasting shall be permitted from February 15 through June 30 unless a field survey determines that there are no nesting raptors (other than kestrels) within 1/2 mile of the blasting site or unless studies are conducted to the satisfaction of Ventura County which indicate that blasting in an area will have no significant impact on nesting raptors.
- **Policy 2.1.2.9:** A field survey by a qualified biologist shall be done prior to destruction or modification of any rocky outcrops. Mitigation measures recommended by the survey shall be implemented.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.4-1: Disturb or Result in Loss of Special-Status Species and Habitat

For the purposes of this analysis, special-status plant and wildlife species include those designations described in Section 8.2, “Biological Resources,” of the Background Report (Appendix B). As described in the Background Report and amended in Tables 4.4-1 and 4.4-2 in “Environmental Setting,” above, 153 special-status plant species and 100 special-status wildlife species are known or have potential to occur within the county. Fifty-nine of these species (35 wildlife species and 24 plant species) are listed under the ESA or CESA or as Fully Protected under California Fish and Game Code. In addition to those species, CEQA requires analysis of Ventura County’s list of Locally Important Plant and Animal species, which, as of 2017, includes 286 plant species and 13 wildlife species and are included in the Background Report (Appendix B). Special-status species in the county are commonly associated with sensitive habitats, such as riparian habitats, wetlands, dunes, coastal sage scrub, chaparral, and woodlands.

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential es and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, mineral resource development, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

Because of the programmatic nature of the 2040 General Plan, a precise, project-level analysis of the specific effects of future development on special-status species is not possible at this time. Thus, this analysis is maintained at a program level.

The Existing Community area designation (boundary) and the Urban area designation (boundary) generally contain less natural habitat, more features associated with urban development (e.g., paved roads, parking lots, buildings, impervious surfaces), and a greater level of disturbance (e.g., anthropogenic light sources, traffic noise, human activity) relative to less developed areas of the county that generally consist of open space, agricultural, and rural land uses. Developed areas may contain some habitat for special-status species, but to a lesser extent of a lesser quality than undeveloped areas; thus, concentrating higher intensity development within and adjacent to these areas would minimize or avoid potential disturbance or loss of special-status species. However, these areas may contain some natural habitats or developed habitats that support special-status species. Additionally, the types of future development that could occur within the Rural, Open Space, and Agricultural land use designations could be located within or adjacent to areas that include special-status species or habitat.

Future development under the 2040 General Plan that could occur in the vicinity of rivers, creeks, and drainages (e.g., Santa Clara River, Ventura River, and tributaries) may be within suitable habitat for species such as California red-legged frog (*Rana draytonii*), foothill yellow-legged frog (*Rana boylei*), western pond turtle (*Actinemys marmorata*), and southern California DPS steelhead (*Oncorhynchus mykiss irideus*). Future development under the 2040 General Plan that could occur in upland habitats could also result in disturbance or loss of special-status species that may occupy those habitats. Additionally, some special-status species known to occur in the county are located within existing developed areas, including but not limited to burrowing owl (*Athene cunicularia*) and nesting birds protected by the California Fish and Game Code and the federal MBTA. Disturbance or loss of special-status species and their habitats could result in reductions in local population size, habitat fragmentation, or reduced reproductive success.

Potential direct impacts on special-status species include injury or mortality that may occur as a result of future development under the 2040 General Plan. Direct impacts also include habitat modification and loss that results in the mortality or otherwise alters the foraging and breeding behavior substantially enough to cause injury. Indirect impacts could be caused by the spread of invasive non-native species that outcompete native species or alter habitat towards a State that is unsuitable for native species.

Habitat for special-status plant and wildlife species may be directly affected (e.g., habitat removal, vegetation removal) or indirectly affected (e.g., habitat fragmentation, increased level of noise or lighting, introduction of invasive, nonnative species), as a result of future development under the 2040 General Plan. Future development under the 2040 General Plan that could result in impacts on biological resources would require project-specific environmental review under CEQA. Species listed as threatened or endangered under the ESA or CESA, or fully protected under California Fish and Game Code, would be protected by existing State and federal laws that address potential impacts through site-specific environmental review and permitting. The County requires evaluation of discretionary projects that could affect biological resources (i.e., sites with natural vegetation; trees; or in proximity to a waterway, drainage, or wetland) under the initial study biological assessment requirements and this evaluation would include site-specific surveys to detect the potential for special-status

species. Environmental review and permitting for these species require development and implementation of project-specific conservation measures to minimize or avoid impacts through the design process and compensatory or other mitigation for any adverse effects on these species as a condition of project approval. Specifically, USFWS, CDFW, and the California Coastal Commission would not permit a project that would degrade habitat or result in loss of State or federally listed species without compensatory mitigation to fully mitigate for the loss.

For other special-status species that have less formal regulatory protection (e.g., CDFW species of special concern, rare plants not protected by CESA or ESA, Locally Important Species), project-level planning and environmental analysis for CEQA review would identify potentially significant impacts, based on the type and location of the project. Impacts to special-status species not protected under CESA or ESA would be considered significant under CEQA, and would be minimized or avoided through the design process (e.g., conducting surveys and modifying the project to avoid special-status species) and through implementation of mitigation for any significant impacts as a condition of project approval (e.g., implementing no-disturbance buffers, limited operating periods for construction and operations, or compensatory habitat enhancement or restoration). As a result, the potential disturbance or loss of special-status species not formally protected by State and federal laws is expected to be limited using standard measures regularly implemented at the project level for these species. Project-specific mitigation measures would be developed consistent with applicable State and federal requirements to reduce impacts to special-status species to less than significant under CEQA. For species for which standard, established mitigation guidance exists (e.g., established by CDFW), developed mitigation measures would follow these standards or provide a similar level of protection. In the absence of previously published guidance, mitigation would be developed in consultation with the appropriate agencies (e.g., CDFW).

In addition to existing State and federal laws and permitting requirements, the 2040 General Plan includes several policies and implementation programs that would further reduce potential direct and indirect impacts on special-status species, including those listed under CESA and ESA and those with less formal regulatory protection, and habitats and require project-level environmental review and mitigation for significant impacts. For example, Policies COS-1.1, COS-1.2, COS-1.3, COS-1.4, COS-1.5, COS-1.6, COS-1.7, COS-1.8, COS-1.9, COS-1.10, COS-1.11, COS-1.12, COS-1.13, COS-1.14, and COS-1.15 address sensitive biological resources, resident and migratory wildlife corridors, habitat connectivity, habitat conservation, wetland setbacks, and consultation with natural resources agencies. For instance, any discretionary development with potential to adversely affect biological resources would require evaluation by a biologist, and if impacts could occur as a result of development, mitigation measures would be developed to account for the impact (Policy COS-1.1). When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts. Additionally, development activities would be required to accommodate wildlife passage, minimize vegetation removal, and avoid riparian and wetland habitat (Policies COS-1.3, COS-1.4, and COS-1.5). Policies COS-2.2, COS-2.4, COS-2.8, COS-2.9, COS-2.10, and COS-2.11 address habitat conservation and protection of fisheries and marine resources within the Coastal Zone specifically, including requirements to replace dune vegetation that is adversely affected due to development activities. Policy COS-9.3 addresses preservation of open space lands for habitat protection and wildlife movement.

Development within the county would also be guided by nine Area Plans, which include additional policies designed to minimize the disturbance or loss of habitats and species, including policies that are specific to resources within each Area Plan (e.g., the Santa Clara River, special-status plants, oak trees) or policies with specific requirements in addition to 2040 General Plan policies (e.g., requirements for biological field reconnaissance reports). For example, the Ojai Valley Area Plan includes policies to protect locally important plant communities and outlines mitigation (e.g., replacement, dedication of conservation easements) to compensate for impacts to these communities in excess of the 2040 General Plan policies. The Oak Park Area Plan includes a policy that requires protection of sensitive plant species that are not identified in the Background Report and may not be considered locally significant outside of the Oak Park area. The Lake Sherwood/Hidden Valley Area Plan includes a policy to prevent impacts to nesting raptors and to rocky outcrop habitat that is more specific than 2040 General Plan policies.

Future development under the 2040 General Plan may result in direct or indirect impacts on special-status plant species, wildlife species, or habitat. Compliance with State law, federal law, and 2040 General Plan policies and implementation programs would reduce potential impacts of future development under the 2040 General Plan and require project-level environmental review under CEQA to evaluate potential impacts on biological resources and mitigate significant impacts on special-status plant and wildlife species. While these laws, policies, and implementation programs would substantially lessen the likelihood of adverse effects on special-status species, there would still be potential for direct or indirect impacts because presence of special-status species may only be determined through focused or protocol-level surveys, specific avoidance measures to prevent disturbance or direct loss of these species would be required, and specific compensation requirements would be necessary if impacts cannot be avoided. The 2040 General Plan does not include policies that specifically address reconnaissance and protocol-level surveys for special-status species, specific avoidance or minimization measures, or compensation requirements. Therefore, future development under the 2040 General Plan could result in adverse effects to special-status species. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program COS-X: Protection of Sensitive Biological Resources

The County shall update the Initial Study Assessment Guidelines, Biological Resources Assessment report criteria to evaluate discretionary development that could potentially impact sensitive biological resources with the following:

- ▶ The qualified biologist shall conduct an initial data review to determine the sensitive biological resources (i.e., special-status plant, special-status wildlife, sensitive habitats [e.g., riparian habitat, sensitive plant communities, ESHA, coastal beaches, sand dunes, other sensitive natural communities], wetlands and other non-wetland waters, native wildlife nursery sites, or wildlife corridors) that have the potential to occur within the project footprint. This will include but not be limited to review of the best available, current data including vegetation mapping data, mapping data from the

County and California Coastal Commission, and database searches of the CNDDDB and the CNPS Inventory of Rare and Endangered Plants of California.

- ▶ The qualified biologist shall conduct a reconnaissance-level survey for sensitive biological resources within the project footprint (including proposed access roads, proposed staging areas, and the immediate vicinity surrounding the project footprint) to determine whether sensitive biological resources identified during the initial data review have potential to occur.
- ▶ If the reconnaissance-level survey identifies no potential for sensitive biological resources to occur, the applicant will not be subject to additional mitigation measures.
- ▶ If sensitive biological resources are observed or determined to have potential to occur within or adjacent to the project footprint during the reconnaissance-level survey, then the following measures shall apply:

Special-Status Species

- If special-status species are observed or determined to have potential to occur within or adjacent to the project footprint, a qualified biologist shall conduct focused or protocol-level surveys for these species where established, current protocols are available (e.g., Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities [CDFW 2018], Staff Report on Burrowing Owl Mitigation [CDFG 2012]). If an established protocol is not available for a special-status species, then the qualified biologist will consult with the County, and CDFW or USFWS, to determine the appropriate survey protocol.
- If special-status species are identified during protocol-level surveys, then the County shall require implementation of mitigation measures that fully account for the adversely affected resource. When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts.
- If impacts on special-status species are unavoidable, then the project proponent shall obtain incidental take authorization from USFWS or CDFW (e.g., for species listed under ESA or CESA) prior to commencing development of the project site, apply minimization measures or other conditions required under incidental take authorization, and shall compensate for impacts to special-status species by acquiring or protecting land that provides habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of project implementation; generally at least a 1:1 ratio. Compensation may include purchasing credits from a USFWS- or CDFW-approved mitigation bank or restoring or enhancing habitat within the project site or outside of the project site.

Sensitive Habitats, Wetlands, Other Non-wetland Waters, Native Wildlife Nursery Sites, and Wildlife Corridors

- If sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors are identified within or adjacent to the project footprint, these features shall be avoided, if feasible, by implementing no-

disturbance buffers around sensitive habitats, wetlands, other non-wetland waters, or native wildlife nursery sites, and avoiding development within wildlife corridors or implementing project-specific design features (e.g., wildlife-friendly fencing and lighting) within wildlife corridors, such that direct and indirect adverse effects of project development are avoided.

- A delineation of aquatic habitat within a project site (including waters of the United States and other waters including those under State jurisdiction) including identification of hydrology, hydric soils, and hydrophytic vegetation, by a qualified biologist may be required to identify the exact extent of wetlands or other water features identified within or adjacent to the project footprint.
- If impacts to sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors cannot be avoided, then the project proponent shall obtain required regulatory authorization (e.g., Section 404 permits for impacts to waters of the United States, 401 water quality certification from the Regional Water Quality Control Board, a Streambed Alteration Agreement for impacts to aquatic or riparian habitats within CDFW jurisdiction under Fish and Game Code Section 1602, a coastal development permit for impacts to ESHA), and shall compensate for unavoidable losses of these resources. Compensation may include restoration of sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors within or outside of the project site, preserving the aforementioned resources through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function, or purchasing credits at an existing authorized mitigation bank or in lieu fee program. The County shall require restoration or compensation for loss of sensitive habitats, wetlands, other non-wetland waters, native wildlife nursery sites, and wildlife corridors at a minimum of a 1:1 ratio or “no-net-loss.”

Significance after Mitigation

With implementation of Mitigation Measure BIO-1 impacts on special-status species and habitat would be substantially lessened because it would require identification the species and habitats during reconnaissance-level and protocol-level surveys, avoidance of these species and habitats as feasible and as required by State and federal law, or incidental take coverage for State-and federally-listed species. As a result, this mitigation measure would routinely reduce project-level impacts to less than significant. However, due to the wide variety of future project types, site conditions, and other circumstances associated with future development, it is possible that there may be project-specific instances in which this mitigation measure would not reduce impacts to a less than significant level. Therefore, this impact would be **significant and unavoidable**.

Impact 4.4-2: Disturb or Result in Loss of Riparian Habitat, Sensitive Plant Communities, ESHA, Coastal Beaches, Sand Dunes, and Other Sensitive Natural Communities

Because of the programmatic nature of the 2040 General Plan, a precise, project-level analysis of the specific impacts of individual development projects under the 2040 General Plan on riparian habitat, sensitive plant communities, ESHA, coastal beaches, sand dunes, or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS (Table 4.4-3) is not possible at this time. Thus, this analysis is maintained at a program level.

Future development that could occur under the land use diagram of the 2040 General Plan is summarized in Impact 4.4-1. The Existing Community area designation (boundary) and the Urban area designation (boundary) generally contain less natural habitat, more features associated with urban development (e.g., paved roads, parking lots, buildings, impervious surfaces), and a greater level of disturbance (e.g., anthropogenic light sources, traffic noise, human activity) relative to less developed areas of the county that generally consist of open space, agricultural, and rural land uses. Developed areas may contain sensitive habitat, but to a lesser extent than undeveloped areas; thus, concentrating higher intensity development within and adjacent to these areas would minimize or avoid potential disturbance or loss of sensitive habitat. However, these areas may contain some sensitive habitat. Additionally, the types of future development that could occur within the Rural, Open Space, and Agricultural land use designations could be located within or adjacent to areas that include sensitive habitat.

Future development under the 2040 General Plan within or adjacent to sensitive habitats may occur and could result in direct or indirect adverse effects on these habitats. Direct impacts on riparian habitat, sensitive plant communities, ESHA, and other sensitive natural communities include temporary or permanent removal or disturbance to these habitats during construction or other activities, potentially adversely affecting the function or degrading the health of the habitat. Impacts on coastal beaches and sand dunes include any activity that causes direct or indirect adverse physical change to these features which is inconsistent with any of the coastal beaches and coastal sand dunes policies of the California Coastal Act, corresponding Coastal Act regulations, or other regulations, plans, and policies. Indirect impacts on sensitive habitats include habitat degradation caused by introduction or spread of invasive plant species or from erosion and sedimentation as a result of construction activities.

Under the 2040 General Plan, each discretionary project that could result in impacts on biological resources would require project-specific environmental review. Impacts on riparian habitat and ESHA would be reduced or avoided through existing State laws which address potential impacts through site-specific environmental review and permitting (e.g., California Fish and Game Code, California Coastal Act) as well as requirements for measures to reduce impacts to sensitive habitats and wildlife that use these habitats. These State laws are described in more detail in the “Regulatory Setting” section of the Background Report (Appendix B). Environmental review and permitting require development and implementation of project-specific conservation measures to minimize or avoid impacts through the design process and compensatory or other mitigation for any adverse effects on these resources as a condition of project approval. Specifically, CDFW or the California Coastal Commission would not permit a project that would degrade these habitats without compensatory mitigation to fully mitigate for the significant impact.

In addition to existing State laws and permitting requirements, the Ventura County Habitat Connectivity and Wildlife Corridor Ordinance contains regulations for development within surface water features (i.e., an area containing a stream, creek, river, wetland, seep, or pond; the riparian habitat associated with the feature; a development buffer of 200 feet as measured from the farthest extent of the features and associated riparian habitat). The 2040 General Plan also includes several policies and implementation programs that would further reduce potential impacts on riparian habitat, and ESHA, and would provide protection for sensitive habitats not otherwise protected by State law, including sensitive plant communities and other sensitive natural communities (Table 4.4-3).

Policies and implementation programs under the 2040 General Plan would require project-level environmental review for discretionary projects (i.e., identification of sensitive habitats within a project site) and mitigation for significant impacts. For example, Policies COS-1.1, COS-1.2, COS-1.7, COS-1.8, COS-1.9, COS-1.10, and COS-1.11 address sensitive biological resources, habitat conservation, wetland setbacks, and consultation with natural resources agencies. For example, these policies require identification, avoidance, and mitigation for impacts on sensitive biological resources for all discretionary development projects, avoidance of riparian habitat during bridge crossing projects, and evaluation of all discretionary development projects within 300 feet of wetland habitat to assess impacts. Policies COS-2.1, COS-2.2, COS-2.4, COS-2.5, COS-2.8, COS-2.9, COS-2.10, COS-2.11 address habitat conservation, beach erosion, shore protection, and protection of fisheries and marine resources within coastal zones.

Development within the county will also be guided by nine existing Area Plans, which include additional policies designed to minimize the disturbance or loss of sensitive habitats. Future development within the Coastal Zone would be guided by the Coastal Area Plan, which includes additional policies that would further reduce impacts on ESHA, coastal beaches, and sand dunes specifically, within the plan area of the 2040 General Plan. For example, these policies include requirements that development within ESHA be sited and designed to prevent impacts which would significantly degrade those areas. These measures are intended to reduce impacts on sensitive habitats within ESHA (e.g., tidepools, rocky substrate, riparian habitat, coastal dunes, wetlands), as well as wildlife (special-status and common wildlife), sensitive plants, and native vegetation, and would specifically do so by identifying requirements for development activities. Policies in the Coastal Area Plan also include measures to protect upland habitats in the Santa Monica Mountains, as adverse effects in these habitats may result in downstream impacts.

Future development under the 2040 General Plan may result in potential loss or degradation of riparian habitat, sensitive plant communities, ESHA, and other sensitive natural communities. Compliance with State law, 2040 General Plan policies and implementation programs, and the Coastal Area Plan would substantially lessen potential impacts of future development under the 2040 General Plan and require project-level environmental review under CEQA to evaluate potential impacts on biological resources and mitigate significant impacts on these habitats. While these laws, policies, and implementation programs would substantially lessen the likelihood of adverse effects on sensitive habitats, there would still be potential for disturbance or loss of sensitive habitat because presence of sensitive habitats may only be determined through focused surveys specific avoidance measures to prevent disturbance or direct loss of these habitats would be required, and specific compensation requirements would be necessary if impacts cannot be avoided. The 2040 General Plan does not include policies that specifically guide focused surveys for sensitive habitat, specific avoidance measures, or compensation requirements. Therefore, the potential loss or degradation of riparian habitat, sensitive plant communities, ESHA, and other sensitive natural communities as a result of implementing the 2040 General Plan would be **potentially significant**.

Mitigation Measures

Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources

Significance after Mitigation

Implementation of Mitigation Measure BIO-1 would substantially lessen significant impacts on sensitive habitats because it would require identification of these resources during reconnaissance-level or focused surveys, avoidance of these features as feasible and as required by State and federal law, or regulatory authorization as required by State and federal law. As a result, this mitigation measure would routinely reduce project-level impacts to less than significant. However, due to the wide variety of future project types, site conditions, and other circumstances associated with future development, it is possible that there may be instances in which this mitigation measure would not reduce impacts to a less than significant level. Therefore, this impact would be **significant and unavoidable**.

Impact 4.4-3: Disturb or Result in Loss of Wetlands and Other Waters

Due to the programmatic nature of the 2040 General Plan, the location, extent, and severity of potential disturbances to wetlands is not known at this time; however, examples of potential impacts include, but are not limited to, development in the vicinity of waterways including the Santa Clara River, the Ventura River, the Brown Barranca, the Franklin Barranca, and tributaries to these rivers. Direct impacts on wetlands caused by future development under the 2040 General Plan could include direct conversion of wetland habitat or other non-wetland waters to other uses. Indirect impacts could include degradation of water quality from increased erosion and sedimentation.

Future development that could occur under the land use diagram of the 2040 General Plan is summarized in Impact 4.4-1. The Existing Community area designation (boundary) and the Urban area designation (boundary) generally contain less natural habitat, more features associated with urban development (e.g., paved roads, parking lots, buildings, impervious surfaces), and a greater level of disturbance (e.g., anthropogenic light sources, traffic noise, human activity) relative to less developed areas of the county that generally consist of open space, agricultural, and rural land uses. Developed areas may contain wetlands, but to a lesser extent than undeveloped areas; thus, concentrating higher intensity development within and adjacent to these areas would minimize or avoid potential disturbance or loss of wetlands. However, these areas may contain some wetlands. Additionally, the types of future development that could occur within the Rural, Open Space, and Agricultural land use designations could be located within or adjacent to areas that include wetlands.

Under the 2040 General Plan, each discretionary project that could result in impacts on biological resources would require project-specific environmental review. Impacts on State and federally protected wetlands would be reduced through existing federal and State laws which address potential impacts through site-specific environmental review and permitting (e.g., Clean Water Act Section 404, California Fish and Game Code, California Coastal Act). These federal and State laws are described in more detail in the “Regulatory Setting” section of the Background Report (Appendix B). Environmental review and permitting require development and implementation of project-specific conservation measures to minimize or avoid impacts through the design process and compensatory or other mitigation for any adverse effects on these resources as a condition of project approval. Specifically, U.S. Army Corps of Engineers, CDFW, or the California Coastal Commission would not permit a project that would degrade wetland habitat without compensatory mitigation to fully mitigate for the significant impact.

In addition to existing federal and State laws and permitting processes, the Ventura County Habitat Connectivity and Wildlife Corridor Ordinance contains regulations for development within surface water features (i.e., an area containing a stream, creek, river, wetland, seep, or pond; the riparian habitat associated with the feature; a development buffer of 200 feet as measured from the farthest extent of the features and associated riparian habitat). The 2040 General Plan includes several policies and implementation programs that would further reduce potential impacts on State and federally protected wetlands and require project-level environmental review and mitigation for significant impacts (see “General Plan Update Policies and Implementation Programs,” above). For example, Policies COS-1.1, COS-1.2, COS-1.7, COS-1.8, and COS-1.9, COS-1.10, and COS-1.11 address sensitive biological resources, habitat conservation (including streams and wetlands), and consultation with natural resources agencies. For example, Policies COS-1.10 and COS-1.11 specifically address implementation of 100-foot (or larger) wetland setbacks and evaluation of all discretionary development within 300 feet of wetlands by a qualified biologist to determine whether impacts would occur. If significant impacts on a wetland habitat may occur, the discretionary project would be prohibited unless mitigation measures were approved that would reduce the impact to a less-than-significant level. Development within the county will also be guided by nine Area Plans; however, the policies of these Area Plans do not provide additional or more specific protection for wetlands and other waters than the 2040 General Plan policies.

Future development under the 2040 General Plan may result in potential loss or degradation of State or federally protected wetlands or waters. Because development would be encouraged in and around cities and unincorporated communities, impacts to wetlands may be minimized or avoided, as these areas typically do not contain high-quality natural habitat. However, some of these areas might contain wetlands, and some development may occur within or adjacent to open space areas that are more likely to contain wetlands. Compliance with State law, federal law, 2040 General Plan policies and implementation programs, and the Ventura County Coastal Area Plan would reduce potential impacts of future development under the 2040 General Plan and require project-level environmental review under CEQA to evaluate potential impacts on biological resources and mitigate significant impacts on wetland habitats.

While these laws, policies, and implementation programs would reduce the likelihood of adverse effects on wetlands, there would still be potential for impact because presence and extent of wetlands may only be determined through focused surveys, specific avoidance measures to prevent disturbance or direct loss of wetlands would be required, and specific compensation requirements would be necessary if impacts cannot be avoided. The Conservation and Open Space Element of the 2040 General Plan does not include policies that specifically outline wetland delineation requirements, specific avoidance measures, or compensation requirements. Therefore, potential loss or degradation of State or federally protected wetlands as a result of implementing the 2040 General Plan would be **potentially significant**.

Mitigation Measures

Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources

Significance after Mitigation

Implementation of Mitigation Measure BIO-1 would substantially lessen significant impacts on wetlands because it would require identification these features during reconnaissance-level surveys, a delineation of waters of the United States, avoidance of these features as feasible and as required by State and federal law, or regulatory authorization as required by State and federal law. As a result, this mitigation measure would routinely reduce project-level impacts to less than significant. However, due to the wide variety of future project types, site conditions, and other circumstances associated with future development, it is possible that there may be instances in which this mitigation measure would not reduce impacts to a less than significant level. Therefore, this impact would be **significant and unavoidable**.

Impact 4.4-4: Interfere with Resident or Migratory Wildlife Corridors or Native Wildlife Nursery Sites

Due to the programmatic nature of the 2040 General Plan, the location, extent, and severity of potential disturbances to wildlife movement corridors or native wildlife nursery sites is not known at this time. However, several regional wildlife corridors have been identified in Ventura County as part of the South Coast Missing Linkages Project and are presented in more detail in the "Habitat Connectivity/Wildlife Corridors" section of the Background Report (Appendix B).

Future development that could occur under the land use diagram of the 2040 General Plan is summarized in Impact 4.4-1. The Existing Community area designation (boundary) and the Urban area designation (boundary) generally contain less natural habitat, more features associated with urban development (e.g., paved roads, parking lots, buildings, impervious surfaces), and a greater level of disturbance (e.g., anthropogenic light sources, traffic noise, human activity) relative to less developed areas of the county that generally consist of open space, agricultural, and rural land uses. Developed areas may provide habitat connectivity or contain native wildlife nursery sites, but to a lesser extent than undeveloped areas; thus, concentrating higher intensity development within and adjacent to these areas would minimize or avoid potential interference with wildlife movement and native wildlife nursery sites at a county-wide level. However, these areas may contain some corridors for wildlife movement or native wildlife nursery sites. While the regional wildlife corridors in the county are largely associated with natural habitat (e.g., Los Padres National Forest, rivers, riparian habitat), portions of these corridors are located within or near existing developed areas and could be adversely affected by future development within these areas (See Figure 8.6 in the Background Report [Appendix B]). Additionally, the types of future development that could occur within the Rural, Open Space, and Agricultural land use designations could be located within or adjacent to areas that include sensitive habitat.

Impacts on wildlife corridors or native wildlife nursery sites include removal of habitat resulting in habitat fragmentation and loss of habitat connectivity, prevention of species dispersal (including wildlife and plants), prevention of shifts in a species' range in response to climate change, or loss of important nursery sites (e.g., deer fawning areas, heron rookeries, bat maternity roosts) or direct interference with wildlife movement corridors through construction of artificial barriers (e.g., fences, roads).

Under the 2040 General Plan, each discretionary project that could result in impacts on biological resources would require project-specific environmental review. Impacts on some sensitive habitats that could function as wildlife corridors or native wildlife nursery sites, including riparian habitats, ESHA, and wetlands, would be reduced through existing federal and State laws which address potential impacts through site-specific environmental review and permitting (e.g., Clean Water Act Section 404, California Fish and Game Code, California Coastal Act). These federal and State laws are described in more detail in the “Regulatory Setting” section of the Background Report (Appendix B). Environmental review and permitting require development and implementation of project-specific conservation measures to minimize or avoid impacts through the design process and compensatory or other mitigation for any adverse effects on these resources as a condition of project approval. Specifically, U.S. Army Corps of Engineers, CDFW, or the California Coastal Commission would not permit a project that would degrade riparian habitat, ESHA, or wetland habitat without compensatory mitigation to fully mitigate for the significant impact.

In addition to existing federal and State laws and permitting processes, the 2040 General Plan includes several policies and implementation programs that would further reduce potential impacts on wildlife corridors and native wildlife nursery sites and require project-level environmental review and mitigation for significant impacts (see “General Plan Update Policies and Implementation Programs,” above). For example, Policies COS-1.1 and COS-1.2 address the protection and consideration of sensitive biological resources, which include wildlife movement corridors and native wildlife nursery site. Because these features are typically considered sensitive biological resources, implementation of Policies COS-1.1 and COS 1.2 would require evaluation of these features during site-specific surveys as well as development of mitigation measures to avoid, minimize, or compensate for impacts. Policies COS-1.7, COS-1.8, COS-1.9, COS-1.10, and COS-1.11 include requirements to requirements for environmental review for projects within 300 feet of wetland habitat, implementation of 100-foot setbacks from wetland habitat, incorporation of protective design features to avoid impacts to riparian habitat, and requirements for consultation with natural resources agencies for guidance regarding avoidance and minimization of impacts to rare, threatened, or endangered species. These requirements would have an indirect benefit on wildlife movement corridors and native wildlife nursery sites as these features are frequently associated with sensitive biological habitats (e.g., wetlands, riparian corridors). Policies COS-2.2, COS-2.4, COS-2.8, COS-2.9, COS-2.10, COS-2.11 address habitat conservation and protection of fisheries and marine resources within the Coastal Zone. Policies COS-1.3, COS-1.4, and COS-1.5 specifically address impacts on wildlife movement. For instance, the County is required to consider impacts to wildlife movement as part of the discretionary project review process, and the design and maintenance of floodplain improvements including culverts and bridges must be reviewed by a qualified biologist to accommodate feasible wildlife passage measures. Policy COS-9.3 addresses preservation of open space lands for habitat protection and wildlife movement. Development within the county will also be guided by nine Area Plans; however, the policies of these Area Plans do not provide additional or more specific protection for resident or migratory wildlife corridors or native wildlife nursery sites than the 2040 General Plan policies.

The Ventura County Habitat Connectivity and Wildlife Corridor ordinances, which are described in more detail above in Section 4.4.1, “Background Report Setting Updates,” require environmental review and discretionary approval of: (1) certain new development, including the construction of certain structures and removal of native vegetation, that is proposed near natural waterbodies/riparian areas or important wildlife crossing structures (e.g., bridges, culverts), and (2) wildlife impermeable fencing that would enclose large areas.

Outdoor lighting is also subject to new regulations in the Habitat Connectivity Wildlife Corridors (HCWC) Overlay Zone. In order to encourage the compact siting of new development in the Critical Wildlife Passages Area (CWPA) overlay zone, which is a particularly sensitive wildlife movement area located within the larger HCWC Overlay Zone, certain proposed development projects would require environmental review and approval unless the development is sited near existing development. The HCWC and CWPA Overlay Zones incorporate regional wildlife corridors previously identified in Ventura County as part of the South Coast Missing Linkages Project which are presented in more detail in the “Habitat Connectivity/Wildlife Corridors” section of the Background Report (Appendix B).

Future development under the 2040 General Plan may result in potential interference with the movement of resident or migratory wildlife or native wildlife nursery sites. Because development would be encouraged in and around existing developed areas, impacts to wildlife movement corridors and native wildlife nursery sites would be minimized or avoided, as these areas typically do not contain high-quality natural habitat. However, some of these areas might contain wildlife movement corridors or native wildlife nursery sites and some development may occur within or adjacent to open space areas that are more likely to contain these features. Compliance with State law would require project-level environmental review under CEQA to evaluate potential impacts on biological resources and mitigation of significant impacts on wildlife movement corridors and native wildlife nursery sites. Federal law, 2040 General Plan policies and implementation programs, and the Ventura County Habitat Connectivity and Wildlife Corridor ordinances would further reduce potential impacts of future development under the 2040 General Plan on these features.

The 2040 General Plan policies and implementation programs and the Ventura County Habitat Connectivity and Wildlife Corridor ordinances in particular substantially reduce the potential for adverse impacts to wildlife movement corridors by establishing known HCWC and CWPA Overlay Zones and guiding development in these zones in order to help preserve functional connectivity for wildlife and vegetation and to minimize loss of vegetation and habitat fragmentation. In addition to protecting wildlife movements, these laws, policies, and implementation programs would also reduce the likelihood of adverse effects on native wildlife nursery sites. However, there would still be potential for adverse impacts because presence of wildlife corridors and native wildlife nursery sites can only be determined through focused surveys and specific avoidance measures to prevent disturbance or direct loss. The 2040 General Plan does not include policies that require specific avoidance or other protection measures for native wildlife nursery sites. However, because the exact location of future development is not known; because native wildlife nursery sites have not been mapped in the county; and because no law, policy, or the HCWC requires complete avoidance of mapped or unmapped wildlife corridors; impacts to these resources could still occur. Therefore, potential loss or degradation of wildlife movement corridors or disturbances to wildlife nursery sites as a result of implementing the 2040 General Plan would be **potentially significant**.

Mitigation Measures

Mitigation Measure BIO-1: New Implementation Program COS-X: Protection of Sensitive Biological Resources

Significance after Mitigation

Implementation of Mitigation Measure BIO-1 would substantially lessen significant impacts on wildlife corridors and native wildlife nursery sites because it would require identification these features during reconnaissance-level surveys, avoidance of these features as feasible and as required by State and federal law, or regulatory authorization as required by State and federal law. As a result, this mitigation measure would routinely reduce project-level impacts to less than significant. However, due to the wide variety of future project types, site conditions, and other circumstances associated with future development, it is possible that there may be instances in which this mitigation measure would not reduce impacts to a less than significant level. Therefore, this impact would be **significant and unavoidable**.

Impact 4.4-5: Conflict with Any Local Policies or Ordinances Protecting Biological Resources

The Ventura County Oak Woodland Management Plan includes the following goals to protect oak woodlands, as outlined in the “Regulatory Setting” section of Section 8.2, “Biological Resources,” of the Background Report (Appendix B):

- ▶ encouraging private landowners and conservation organizations to protect oak woodlands;
- ▶ ensuring consistent consideration of oak woodlands during discretionary permit review;
- ▶ considering appropriate amendments to Ventura County’s regulatory plans and ordinances, as funding permits; and
- ▶ supporting countywide biological data collection, analysis, and mapping.

The Ventura County Non-Coastal Zoning Ordinance and Coastal Zoning Ordinance Tree Protection Regulations identify protected trees and require permitting from the County’s Planning Division to remove such trees. Protected trees under the ordinance include all oaks and sycamores 9.5 inches in circumference or larger, and most 9.5-inch in circumference or larger native trees located in the Scenic Resource Protection Overlay Zone. In the Coastal Zone, protected trees include trees considered ESHA, native trees, historic trees, and heritage trees. In the Coastal Zone, permits are required to alter any tree, including non-native trees.

Future development that could occur under the land use diagram of the 2040 General Plan is summarized in Impact 4.4-1. The Existing Community area designation (boundary) and the Urban area designation (boundary) generally contain less natural habitat, more features associated with urban development (e.g., paved roads, parking lots, buildings, impervious surfaces), and a greater level of disturbance (e.g., anthropogenic light sources, traffic noise, human activity) relative to less developed areas of the county that generally consist of open space, agricultural, and rural land uses. Developed areas may contain oak woodlands, oak and sycamore trees, or other native trees, but to a lesser extent than undeveloped areas; thus, concentrating higher intensity development within and adjacent to these areas would minimize or avoid potential loss of oak woodlands, oak and sycamore trees, or other native trees protected by local policies or ordinances.

Several sensitive natural communities containing oak woodland habitat (e.g., valley oak woodland, southern coast live oak riparian forest, canyon live oak ravine forest), sycamore trees (e.g., southern sycamore alder riparian woodland), and other native tree species have been identified within the county (Table 4.4-3).

The 2040 General Plan includes policies and implementation programs that would reduce potential impacts on these sensitive natural habitats and require project-level environmental review and mitigation for significant impacts (see “General Plan Update Policies and Implementation Programs,” above). These policies include COS-1.1 and COS-1.2, which require identification, avoidance, and mitigation for impacts of sensitive habitats and other biological resources and subsequent avoidance, minimization, and compensation for impacts on these resources.

Because applicants for projects requiring discretionary approval would be required to abide by the restrictions in and implement mitigation based on the Ventura County Oak Woodland Management Plan and Tree Protection Regulations, future development under the 2040 General Plan is not expected to conflict with these plans and ordinances. The Aesthetics (Section 4.1), Hydrology and Water Quality (Section 4.10), and Noise and Vibration (Section 4.13) sections of the draft EIR include analysis of local ordinances concerning lighting, noise, and water quality that may have an indirect effect on biological resources. Therefore, impacts related to potential conflicts with local policies or ordinances protecting biological resources would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

4.5 CULTURAL, TRIBAL CULTURAL, AND PALEONTOLOGICAL RESOURCES

This section evaluates the potential impacts of implementing the 2040 General Plan on known and unknown cultural resources, including archaeological, historical, and tribal cultural resources, and human remains. Paleontological resources impacts are also evaluated in this section. Cultural resources include districts, sites, buildings, structures, or objects generally older than 50 years and considered to be important to a culture, subculture, or community for scientific, traditional, religious, or other reasons. They include pre-historic resources, historic-era resources, and “tribal cultural resources” (the latter as defined by Assembly Bill [AB] 52, Statutes of 2014, in Public Resources Code [PRC; Section 21074]). Archaeological resources are locations where human activity has measurably altered the earth or left deposits of prehistoric or historic-era physical remains (e.g., stone tools, bottles, former roads, house foundations). Historical (or architectural) resources include standing buildings (e.g., houses, barns, outbuildings, cabins) and intact structures (e.g., dams, bridges, roads, districts), or landscapes.

A cultural landscape is defined as a geographic area (including both cultural and natural resources and the wildlife therein), associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values. Tribal cultural resources were added as a resource subject to review under CEQA, effective January 1, 2015 under AB 52 and includes site features, places, cultural landscapes, sacred places or objects, which are of cultural value to a Native American tribe. Paleontological resources include the fossilized remains of plants and animals, including vertebrates, invertebrates, and fossils of microscopic plants and animals. These resources help to establish a historical record of past plant and animal life and assist geologists in dating rock formations. As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments received on the notice of preparation (NOP) included concerns related to AB 52 consultation and consultation requirements under Senate Bill (SB) 18 (Statutes of 2004, in California Civil Code Section 815.3). SB 18 consultation is not a CEQA requirement and, therefore, is not discussed in this section. Additional comments included those related to historic preservation and historic districts. These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

4.5.1 Background Report Setting Updates

REGULATORY SETTING

In addition to the information provided in Section 8.6, “Cultural, Historical, Paleontological, and Archaeological Resources,” of the Background Report (Appendix B), the following information is relevant to understanding the potential archaeological, historical, tribal cultural, and paleontological resource impacts of the 2040 General Plan:

Secretary of the Interior's Standards

The *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Secretary's Standards), codified in 36 CFR 67, provide guidance for working with historic properties. The Secretary's Standards are used by lead agencies to evaluate proposed rehabilitative work on historic properties. The Secretary's Standards are a useful analytic tool for understanding and describing the potential impacts of proposed changes to historic resources. Projects that comply with the Secretary's Standards benefit from a regulatory presumption that they would not result in a significant impact to a historic resource. Projects that do not comply with the Secretary's Standards may or may not cause a substantial adverse change in the significance of a historic property.

In 1992, the Secretary's Standards were revised so they could be applied to all types of historic resources, including landscapes. They were reduced to four sets of treatments to guide work on historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. The four distinct treatments are defined as follows:

- ▶ **Preservation** focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time.
- ▶ **Rehabilitation** acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character.
- ▶ **Restoration** depicts a property at a particular period of time in its history, while removing evidence of other periods.
- ▶ **Reconstruction** re-creates vanished or non-surviving portions of a property for interpretive purposes.

The Guidelines for the Treatment of Historic Properties

The *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* (Guidelines) illustrate how to apply the four treatments detailed above to historic properties in a way that meets the Secretary's Standards and are advisory, not regulatory. The purpose of the Guidelines is to provide guidance to historic building owners and building managers, preservation consultants, architects, contractors, and project reviewers prior to beginning work. They address both exterior and interior work on historic buildings. There are four sections, each focusing on one of the four treatment Standards: Preservation, Rehabilitation, Restoration, and Reconstruction. Each section includes one set of Standards with accompanying Guidelines that are to be used throughout the course of a project.

Ventura County Coastal Zoning Ordinance

The Ventura County Coastal Zoning Ordinance includes guidelines for development within areas under coastal jurisdiction. The ordinance contains several measures for the avoidance and protection of archaeological, historical, tribal cultural, and paleontological resources. Specifically, Section 8175-5.7.6 states that development plans shall contain a plan for eliminating or mitigating adverse impacts to archaeological sites. Section 8175-5.7.7 and 8175-5.9 state that development of oil, energy, and public works infrastructure shall be sited and/or routed to avoid archaeological and paleontological-rich areas. Further, Section 8178-3 provides guidance and protocol for protection of archaeological, historic, and tribal cultural resources within the Coastal Zone. These include measures for project siting, avoidance of known resources, Phase I inventories and Phase II evaluations, as well as implementing a mitigation plan and requiring

construction monitoring. Phase I inventories involve a California Historical Resources Information System (CHRIS) record search, Sacred Lands File search, a surface survey to determine the presence or absence of archaeological resources, and a report containing findings. Phase II inventories involve subsurface exploration (i.e., hand or auger excavations, shovel test pits or trenches), a determination of resource boundaries, an analysis of recovered materials, and an assessment to determine the resource integrity. Section 8178-3 also provides measures for encountering paleontological resources, including evaluation, documentation, and monitoring (Ventura County 2017a).

Ventura County Non-Coastal Zoning Ordinance

The Ventura County Non-Coastal Zoning Ordinance includes guidelines for development that identify appropriate measures for the avoidance and protection of archaeological, historical, tribal cultural, and paleontological resources. Specifically, Section 8107-5.5.5 states that oil and gas pipelines should be sited and/or routed to avoid important resources areas, including archaeological and paleontological-rich areas. Section 8107-44.5, "Construction and Operational Standards," provides requirements and protocol in the event that any cultural resources are discovered during construction activities associated with emergency shelters. Sections 8104-7.4 and 8109-4.5.3 include standards for preservation of historic character within the Community Business District overlay zone. Additional standards are provided within the ordinance that address development within or near landmarks, structures, districts, and trees that are considered to be of historical and/or cultural significance (Ventura County 2017b).

Ventura County Cultural Heritage Board Ordinance

The Ventura County Cultural Heritage Ordinance was established to preserve and protect public and private historic, cultural, and natural resources which are of special historical or aesthetic character or interest, or relocating or recreating such resources where necessary for their preservation, use, education, and view by the public (Ventura County n.d.) Under the ordinance, the Cultural Heritage Board establishes, updates, and maintains a list of buildings, structures, objects, and sites of historical, architectural, community, or aesthetic merit. The Cultural Heritage Board is responsible for providing recommendations related to the preservation and enhancement of resources, maintaining the Local Register of Historic Places, providing recommendations for resource inclusion in the California Register, recommending zoning, designating cultural heritage sites, and conducting surveys. The ordinance includes definitions and designation criteria for cultural heritage sites (Ventura County n.d.).

ENVIRONMENTAL SETTING

In addition to the information provided in Section 8.6, "Cultural, Historical, Paleontological, and Archaeological Resources" of the Background Report (Appendix B), the following information is relevant to understanding the potential archaeological, historical, tribal cultural, and paleontological resource impacts of the 2040 General Plan:

Tribal Cultural Resources

Native American Heritage Commission

The Native American Heritage Commission (NAHC) was contacted in 2016 as part of the process to develop the 2040 General Plan and to comply with consultation requirements pursuant to SB 18. The NAHC response, dated March 7, 2016, identified several tribes located in the plan area for the County to contact. On December 28, 2018, the County contacted the NAHC to secure a tribal consultation list pursuant to AB 52.

Native American Consultation

A Native American contact program was initiated pursuant to AB 52 in January 2019. The following are tribes and tribal representatives that were contacted:

- ▶ Barbareno/Ventureno Band of Mission Indians, Julie Lynn Tumamait-Stenslie, Chairperson; Patrick Tumamait, Eleanor Arrellanes, and Raudel Banuelos, Jr.;
- ▶ San Luis Obispo County Chumash Council, Mark Steven Viai, Tribal Chief;
- ▶ Santa Ynez Band of Chumash Indians, Kenneth Kahn, Chairperson;
- ▶ Coastal Band of the Chumash Nation, Mia Lopez; and
- ▶ Fernandeano Tataviam Band of Mission Indians, Jairo F. Avila, Tribal Historic and Cultural Preservation Officer.

In 2017, the County initiated SB 18 and AB 52 Native American consultation with the Barbareno/Ventureno Band of Mission Indians and a meeting was held to discuss the 2040 General Plan. On October 13, 2017, Planning Division staff submitted a letter to the Barbareno/Ventureno Band of Mission Indians requesting clarification on public comments submitted by the tribe on the General Plan draft Background Report. To date, no response has been submitted to the County regarding this requested clarification. On January 11, 2019, a Notice of Preparation for the draft EIR was submitted to the Barbareno/Ventureno Band of Mission Indians. Subsequent to the release of the draft EIR for public review and comment, and pursuant to AB 52, County staff will consult with the Barbareno/Ventureno Band of Mission Indians regarding the contents of the EIR. Pursuant to Public Resources Code Section 21082.3, the County shall conclude AB 52 consultation prior to requesting the Board of Supervisors certify the 2040 General Plan Final Program EIR.

Additionally, on January 17, 2019, the County initiated AB 52 consultation with the Fernandeano Tataviam Band of Mission Indians. As of January 2020, AB 52 consultation is still underway. On September 10, 2019, Jairo F. Avila, Tribal Historic and Cultural Preservation Officer for the Fernandeano Tataviam Band of Mission Indians requested review of the draft EIR and any Archaeological/Cultural Resource reports considered for the 2040 General Plan, when available. Subsequent to the release of the draft EIR for public review and comment, and pursuant to AB 52, County staff will consult with the Barbareno/Ventureno Band of Mission Indians and the Fernandeano Tataviam Band of Mission Indians regarding the contents of the EIR. Pursuant to Public Resources Code Section 21082.3, the County shall conclude AB 52 consultation prior to requesting the Board of Supervisors certify the 2040 General Plan Final Program EIR. No other California Native American tribes have requested formal AB 52 consultation or additional information.

4.5.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

This program-level analysis identifies the potential impacts of implementation of the 2040 General Plan on cultural, archaeological, historical, tribal cultural, and paleontological resources. The impact analysis considers the nature and location of the known archaeological, historical, tribal cultural, and paleontological resources, as well as the types of locations and conditions with the potential for previously undocumented resources, including human remains.

Potential physical effects (e.g., disturbance, material alteration, demolition) to known and previously undocumented resources are evaluated by comparing their known and potential locations to the buildout of land uses that would be allowed under the land use diagram of the 2040 General Plan. The analysis evaluates the ability of the policies and implementation programs of the 2040 General Plan to avoid or substantially lessen adverse impacts to archaeological, historical, tribal cultural, and paleontological resources.

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on the County’s adopted Initial Study Assessment Guidelines (ISAG), which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project’s impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, the ISAG does not include thresholds for analyzing potential substantial adverse changes to tribal cultural resources or disturbance of human remains. Therefore, Appendix G questions XVIII(a-b) regarding effects on tribal cultural resources, and Appendix G question V(c) addressing disturbance of human remains have been added as thresholds below.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant impact on cultural, tribal cultural, or paleontological resources if it would:

- ▶ Demolish or materially alter in an adverse manner those physical characteristics of an archaeological resource that account for its inclusion in a local register of *historical resources* pursuant to Section 5020.1(k) requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not archaeologically or culturally significant.
- ▶ Demolish or materially alter in an adverse manner those physical characteristics of an archaeological resource that convey its archaeological significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.
- ▶ Demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources.
- ▶ Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant.

- ▶ Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.
- ▶ Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.
- ▶ Cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074.
- ▶ Result in the disturbance of human remains, including those interred outside of formal cemeteries.
- ▶ Result in grading and excavation of fossiliferous rock (identified as “Moderate to High” or “High” on Table D.2 of the ISAG) or increase access opportunities and unauthorized collection of fossil materials from valuable sites.

ISSUES NOT DISCUSSED FURTHER

California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code Sections 7050.5 and 7052 and California PRC Section 5097. Future development that could occur during the planning horizon of the 2040 General Plan would be required to comply with the California Health and Safety Code as well as the California PRC. Therefore, no impact would occur, and this issue is not discussed further.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

The 2040 General Plan policies and implementation programs related to cultural, tribal cultural, and paleontological resources and, specifically, the thresholds of significance identified above, include the following:

Conservation and Open Space Element

- ▶ **Policy COS-4.1: Cultural, Historical, Paleontological, and Archaeological Resources Inventory.** The County shall maintain an inventory of cultural, historical, paleontological, and archaeological resources in Ventura County based on project studies and secondary resources. (MPSP) *[Source: Existing GPP Goal 1.1.1.1, modified]*
- ▶ **Policy COS-4.2: Cooperation for Cultural, Historical, Paleontological, and Archaeological Resource Preservation.** The County shall cooperate with cities, special districts, other appropriate organizations, and private landowners to identify and preserve the county's cultural, historical, paleontological, and archaeological resources. (IGC) *[Source: Existing GPP Goal 1.8.1.2, modified]*

- ▶ **Policy COS-4.3: Historical Landmarks Preservation.** The County shall require all structures and sites that are designated, or being considered for designation, as County Historical Landmarks to be preserved as a condition of discretionary development, in accordance with the Secretary of the Interior Standards, unless a structure is unsafe or deteriorated beyond repair. The property owner shall place an appropriate marker on the site to describe the historical significance of the structure, site or event. (RDR) *[Source: Existing Oak Park Area Plan Policy 1.5.2.2, Ojai Valley Area Plan Policy 1.7.2.2, and Thousand Oaks Area Plan Policy 1.5.2.2, modified]*
- ▶ **Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation.** The County shall require discretionary development be assessed for potential cultural, historical, paleontological, and archaeological resources by a qualified professional and be designed to avoid impacts to these resources whenever to the maximum extent feasible. Unavoidable impacts, whenever possible shall be reduced to a less than significant level and/or shall be mitigated by extracting maximum recoverable data. (RDR) *[Source: Existing GPP Policy 1.8.2.1, GPP Policy 1.8.2.2, Ojai Valley Area Plan Goal 1.7.1.2 and Policy 1.7.2.1, Thousand Oaks Area Plan Goal 1.5.1.4 and Policy 1.5.2.1, Oak Park Area Plan Policy 1.5.2.1, and Piru Area Plan Policy 1.4.2.2, modified]*
- ▶ **Policy COS-4.5: Adaptive Reuse of Historic Structures.** The County shall encourage discretionary development to adaptively reuse architecturally or historically significant buildings if the original use of the structure is no longer feasible and the new use is allowed by the underlying land use designation and zoning district. (RDR) *[Source: New Policy]*
- ▶ **Policy COS-4.6: Architectural Design to Reflect Historic and Cultural Traditions.** The County shall encourage discretionary development to incorporate architectural designs and features that reflect the historical and cultural traditions characteristic to the area or community. (RDR) *[Source: Existing Piru Area Plan Policy 1.4.2.3, modified]*
- ▶ **Policy COS-4.7: Cultural Heritage Board Review.** Prior to environmental review of discretionary development, the County shall determine whether a site has potential archaeological, architectural or historical significance and provide this information to the County Cultural Heritage Board for evaluation and recommendation to the appropriate decision-making body. (RDR) *[Source: Existing GPP Policy 1.8.2.5]*

Coastal Area Plan

Archaeological Resources

Policies

1. Discretionary development shall be reviewed to identify potential locations for sensitive archaeological resources.
2. New development shall be sited and designed to avoid adverse impacts to archaeological resources to the maximum extent feasible. If there is no feasible alternative that can eliminate all impacts to archaeological resources, then the alternative that would result in the fewest or least significant impacts to resources shall be selected. Impacts to archaeological resources that cannot be avoided through siting and design alternatives shall be mitigated. When impacts to archaeological resources cannot be avoided, mitigation shall be required and shall be designed in accordance with established federal, State

and/or County standards and shall be consistent with the policies and provisions of the LCP.

3. Archaeological, historical and ethnographic interpretation of native peoples in Ventura County should be incorporated into existing interpretive programs at public recreation facilities as feasible and into future interpretive programs as funds become available.
4. The location of all coastal zone archaeological sites shall be kept confidential to avert disturbance or destruction of the resource.
5. Native American tribal groups approved by the Native American Heritage Commission for the area shall be consulted when development has the potential to adversely impact archeological resources.
6. Protect and preserve archaeological resources from destruction and avoid impacts to such resources where feasible.
7. The unauthorized collection of archaeological artifacts is prohibited.

Paleontological Resources

Policies

1. Discretionary development shall be reviewed to determine the geologic unit(s) to be impacted and paleontological significance of the geologic rock units containing them.
2. New development shall be sited and designed to avoid adverse impacts to paleontological resources to the maximum extent feasible. If there is no feasible alternative that can eliminate all impacts to paleontological resources, then the alternative that would result in the fewest or least significant impacts to resources shall be selected. Impacts to paleontological resources that cannot be avoided through siting and design alternatives shall be mitigated. When impacts to paleontological resources cannot be avoided, mitigation shall be required that includes procedures for monitoring grading and handling fossil discoveries that may occur during development.
3. Protect and preserve paleontological resources from destruction and avoid impacts to such resources where feasible.
4. The unauthorized collection of paleontological artifacts is prohibited.

Oak Park Area Plan

- **Policy OP-50.1: Archaeological Resources Organization and Chumash Indian Community Review.** The County shall require all discretionary permits involving construction or earth movement within the Oak Park Area of Interest to be reviewed by the County's designated archaeological resource organization and representatives of the local Chumash Indian Community. Where deemed necessary by the Planning Division, the County shall require a field reconnaissance study to be conducted by a County approved archaeologist to determine the potential for surface or subsurface cultural remains. The County shall require appropriate mitigation of impacts to identified sites, as recommended by the archaeologist and approved by the County. The County shall require grading to be monitored within those areas determined by the field survey to be of moderate or higher

likelihood to yield buried artifacts. The County shall require monitors to be empowered to halt construction in the immediate vicinity of unearthed artifacts until adequate investigation has occurred. *[Source: Existing Oak Park Policy 1.5.2.1]*

Ojai Valley Area Plan

- ▶ **Policy OJ-44.1: Archaeological Resource Review.** The County shall require all discretionary development permits involving construction or earth movement within the Ojai Valley to be reviewed by the County's designated archaeological resource review organization.

a. Whenever such discretionary development requires a field reconnaissance study, the County shall require such study to be conducted by a County approved archaeologist to determine the potential for surface or subsurface cultural remains.

b. The County shall require a qualified archaeological monitor to be present to monitor significant trenching or earth movement at any such site if deemed to be needed by the study. If the archaeological monitor is not a Native American and Native American cultural resources are found at the site, the County shall require a Native American monitor.

c. In the event that artifacts of historical or archaeological significance are uncovered, the County shall empower the qualified archaeological monitor to halt construction in the immediate vicinity of such unearthed artifacts until disposition of the site has been determined by the County Planning Division.

[Source: Existing Ojai Valley Policy 1.7.2.1]

- ▶ **Policy OJ-43.1: Historical Structure Preservation.** The County shall require all structures and/or sites designated, or being considered for designation as County Historical Landmarks within the Ojai Valley to be preserved or appropriately salvaged, when deemed reasonable by the permitting authority, as a condition of discretionary development. The County shall require all costs of preservation/salvage to be borne by the developer. The County shall require an appropriate marker to be placed on the site to describe the historical significance of the structure, site or event. *[Source: Existing Ojai Valley Policy 1.7.2.2]*

Piru Area Plan

- ▶ **Policy P-44.1: Important Landmark Preservation.** The County shall require important local landmarks such as the Piru Mansion, Piru Methodist Church, Lechler's Museum, Juan Fustero Historical Marker, Round Rock Hotel, Piru Cemetery (including the cross above the cemetery), Old Center Street Bridge, Piru Train Bridge and Camulos Ranch (including the ranch cemetery, chapel and walnut tree) be preserved and protected where feasible for the benefit of future generations by designation of eligible properties as County Historic Landmarks. *[Source: Existing Piru Policy 1.4.2.1]*

- ▶ **Policy P-44.2: Archaeologically Significant Area Review Requirement.** The County shall require all discretionary permits involving construction or earth movement within the Piru Area of Interest be reviewed by the State Central Coastal Information Center and Native American organizations as designated by the Native American Heritage Commission. If the development is located within an archaeologically sensitive area, the County shall require a field reconnaissance study be conducted by a County approved archaeologist to determine the potential for surface or subsurface cultural remains. The County shall require a qualified

archaeological observer and Native American representative be present during any trenching or earth movement at such sites. If artifacts of historical or archaeological significance are uncovered, the County shall require the site be preserved until the County Planning Division determines the proper disposition of the site based on a recommendation from a qualified archaeologist and the local Chumash Native American Community. *[Source: Existing Piru Policy 1.4.2.2]*

Saticoy Area Plan

- ▶ **LU-P4: Landmark Status for Depot.** The County will:
 - a. Submit a nomination to the County's Cultural Heritage Board to designate the Saticoy Southern Pacific Railroad Depot as a County Historic Landmark;
 - b. Seek grant money to help fund necessary building improvements; and
 - c. Pending available staff resources, County staff will prepare an application to place the Depot on the National Register of Historic Places (in order to be eligible for federal grants), and if accepted subsequently apply for federal grants for building renovations.
- ▶ **LU-P5: Railroad Depot Design Assistance.** The County will contact regional architecture and planning schools to identify design/renovation options for the Railroad Depot that are consistent with its Landmark status.
- ▶ **LU-P6: Sites of Merit.** Sites found to be eligible for listing on the National Register of Historic Places (i.e., sites with code "3s" in the Historic Resources Survey and Context Statement for the Town of Saticoy), and sites found to be individually eligible for listing as a Site of Merit under Ventura County Criteria (i.e., sites with code "5s3"), shall be identified as eligible County Landmarks (3s) or Sites of Merit (5s3) in the County's project tracking system (i.e., Accela). The County shall hold a public hearing before the County's Cultural Heritage Board (CHB) to determine final eligibility. Following the CHB hearing, the County will update the County's database to reflect the historic status (eligible, designated) for each property.
- ▶ **LU-P7: Document Historic Resources.** For the four eligible Sites of Merit redesignated from residential to industrial use (see Table 3-1), the County will seek funding for an historic preservation professional, qualified in accordance with the Secretary of Interior Standards, to complete a documentation report for those structures. Pending available funding, the properties will be documented with Historic American Buildings Survey (HABS)-like archival quality large format photographs. An original copy of this documentation, photographs and negatives, along with the historical background of the properties prepared for this project, shall be submitted to an appropriate repository approved by the County and to the Museum of Ventura County, with copies to the Ventura County Cultural Heritage Board and photographic copies to the Saticoy Library.

Thousand Oaks Area Plan

- ▶ **Policy TO-45.1: Archaeological Resource Review Requirement.** The County shall require all discretionary development permits involving construction or earth movement within the Thousand Oaks Area of Interest to be reviewed by the County's designated archaeological resource review organization. Whenever a discretionary development project is located within an archaeologically sensitive area, the County shall require the following requirements:

- (1) The County shall require a field reconnaissance study to be conducted by a County approved archaeologist to determine the potential for surface or subsurface cultural reservoirs.
- (2) The County shall require a qualified archaeological monitor to be present to monitor trenching or earth movement during construction.
- (3) In the event that artifacts of historical or archaeological significance are uncovered, the County shall require the qualified archaeological monitor to be empowered to halt construction in the immediate vicinity of such unearthened artifacts until disposition of the site has been determined by the County Planning Division.

[Source: Existing Thousand Oaks Policy 1.5.2.1]

Lake Sherwood/Hidden Valley Area Plan

- ▶ **Policy LS-42.1: County Historical Landmarks.** The County shall require that all structures/sites designated, or being considered for designation, as County Historical Landmarks be preserved or appropriately salvaged as a condition of discretionary development. *[Source: Existing Lake Sherwood/Hidden Valley Policy 2.2.2.10]*
- ▶ **Policy LS-42.2: Local Native American Representative Consultation.** The County shall require all archaeological studies and surveys to be performed in consultation with local Native American representatives. *[Source: Existing Lake Sherwood/Hidden Valley Policy 2.2.2.1]*
- ▶ **Policy LS-42.3: Archaeological Requirements for Discretionary Development.** The County shall condition discretionary development to submit an archaeological literature search and walkover survey by a qualified archaeologist approved by the County. The County shall require further testing to determine the significance and boundaries of sites, if determined to be necessary by the archaeologist. The County shall require appropriate mitigation of impacts to identified sites, as recommended by the archaeologist and approved by the County. The County shall monitor grading within those areas determined by the field survey to be of moderate or higher likelihood to yield buried artifacts. The County shall empower monitors to halt construction in the immediate vicinity of unburied artifacts until adequate mitigation can be implemented. *[Source: Existing Lake Sherwood/Hidden Valley Policy 2.2.2.9]*
- ▶ **Policy LS-42.4: Walkover Archaeological Survey Requirement for Unsurveyed Areas.** Where deemed appropriate by the Planning Division, the County shall require, prior to issuance of the first discretionary entitlement, the applicant to conduct a walkover archaeological survey of unsurveyed portions of the area where there is a potential for direct and indirect impacts. the County shall require testing to determine site significance and site boundaries as recommended by the archaeologist. The County shall require mitigation measures recommended by the archaeologist to be implemented. The County shall require grading to be monitored per the recommendations of the survey. *[Source: Existing Lake Sherwood/Hidden Valley Policy 2.2.2.2]*
- ▶ **Policy LS-42.5: P.U.2 Rock Shelters.** Prior to the issuance of the first appropriate discretionary entitlement (as determined by the Planning Division), the County shall condition the applicant to perform testing to determine the significance of the rock shelters on P.U. 2

and to protect the shelters and/or perform scientific data recovery. *[Source: Existing Lake Sherwood/Hidden Valley Policy 2.2.2.3]*

- ▶ **Policy LS-42.6: Trinomial Designations for Relocated Bedrock Mortar in P.U.4.** Prior to the issuance of the first appropriate discretionary entitlement, the County shall condition the applicant to record and assign a trinomial designation to the relocated bedrock mortar in P. U. 4. *[Source: Existing Lake Sherwood/Hidden Valley Policy 2.2.2.4]*
- ▶ **Policy LS-42.7: Lake Bed Archaeologic Sites.** If Lake Sherwood is drained at some future date, the County shall require subsequent grading conditional use permits to evaluate and protect archaeological sites in the lake bed. *[Source: Existing Lake Sherwood/Hidden Valley Policy 2.2.2.5]*
- ▶ **Policy LS-42.8: Disturbance to Offsite Resources.** Prior to the issuance of the first appropriate discretionary entitlement the applicant shall be conditioned to prevent disturbance to potential offsite resources by maintaining perimeter fencing and/or participating in survey and mitigation on surrounding properties together with adjoining property owners. *[Source: Existing Lake Sherwood/Hidden Valley Policy 2.2.2.7]*
- ▶ **Policy LS-42.9: Stafford Road Realignment Testing.** Prior to the issuance of the first appropriate discretionary entitlement, the County shall require the applicant to perform testing in portions of the Stafford Road realignment not previously tested to determine potential impacts. If warranted, the County shall require the applicant to perform scientific data recovery or project redesign. *[Source: Existing Lake Sherwood/Hidden Valley Policy 2.2.2.6]*

Policy LS-43.1: China Flats Area Historical Significance. Prior to the issuance of the first appropriate discretionary entitlement, the County shall condition the applicant to resurvey the China Flats area for historic significance and to preserve it or perform scientific data recovery as warranted. *[Source: Existing Lake Sherwood/Hidden Valley Policy 2.2.2.8]*

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.5-1: Substantial Adverse Change in the Significance of an Archaeological Resource Pursuant to PRC 5024.1 and CEQA

As described in Section 8.6, “Cultural, Historical, Paleontological, and Archaeological Resources,” of the Background Report (Appendix B), the county is archaeologically and culturally significant, with many archaeological resources located near former water and food sources. As of January 2018, 1,637 prehistoric archaeological sites have been documented within the county. Because the county is considered archaeologically rich, there is an increased likelihood for discovery of prehistoric and historic-era archaeological resources.

The land use diagram of the 2040 General Plan would accommodate future development within the Existing Community area designation (boundary) and the Urban area designation (boundary) which allows for relatively higher intensity residential, commercial, mixed use, and industrial land uses. These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county.

Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

Generally, the likelihood of discovering archaeological materials, features, or sites would be greater in areas that have been previously undeveloped, such as vacant property or rural or open space uses. However, it is possible that such resources could be discovered through project-level construction in areas that contain native fill or soil. Though buildout of the 2040 General Plan includes areas which have previously been developed, future projects could also occur in more rural areas of the county. Therefore, discretionary development that could occur during the planning horizon of the 2040 General Plan could be in areas of high archaeological sensitivity and could encounter previously undiscovered or unrecorded archaeological sites, materials, or features. Ground-disturbance associated with project-level construction activities could damage or destroy previously undiscovered archaeological features or sites, thereby resulting in a substantial change in the significance of the resource (as defined in PRC 5024.1 and CEQA Guidelines Section 15064.5). As a result, these activities could result in the adverse alteration of a physical characteristics of an archaeological resource that could prevent the resource from being included on a local, State, or federal register of historic resources.

As detailed in Section 8.6 of the Background Report (Appendix B), there are a number of State and local regulations and programs in place that protect archaeological resources in the county. Relevant regulations and programs include:

- ▶ Section 106 of the National Historic Preservation Act,
- ▶ CEQA Section 15064.5,
- ▶ Ventura County Coastal Zoning Ordinance,

- ▶ Ventura County Non-Coastal Zoning Ordinance,
- ▶ 2011 Ventura County ISAG, and
- ▶ Ventura County Specific Area Plans

Section 106 of the National Historic Preservation Act and accompanying regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the main federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed in or may be eligible for listing in the National Register of Historic Places (NRHP). Listing in the NRHP does not entail specific protection or assistance for a property but it does guarantee recognition in planning for federal or federally-assisted projects, eligibility for federal tax benefits, and qualification for federal historic preservation assistance. Additionally, project effects on properties listed in the NRHP must be evaluated under CEQA.

CEQA also requires lead agencies to consider whether projects will impact unique archaeological resources. Public Resources Code, Section 21083.2, subdivision (g), states that unique archaeological resource means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it contains scientific importance, contains particular qualities such as being the best or oldest example of its type, or is associated with prehistoric or historic event or person.

The Ventura County Coastal and Non-Coastal Zoning Ordinances provide guidelines for development within areas under their respective jurisdictions. The ordinances contain measures for the avoidance and protection of archaeological resources. The ordinances also provide requirements and protocol (i.e. Phase I and II inventories) in the event that any resources are identified or discovered during construction activities of specific development types (infrastructure and emergency shelter projects). As previously described in Section 4.5.1, “Background Report Setting Updates,” a Phase I inventory would require a CHRIS record search, Sacred Lands File search, a surface survey to determine the presence or absence of archaeological resources, and a report containing findings. Phase II inventories involve subsurface exploration (i.e., hand or auger excavations, shovel test pits or trenches), a determination of resource boundaries, an analysis of recovered materials, and an assessment to determine the resource integrity (Ventura County 2017a, 2017b).

The Ventura County ISAG contains guidance of assessing and determining impacts to archaeological resources. These include, but are not limited to, conducting records searches with the CHRIS information center, surface surveys, and preparations of assessments by a qualified archaeological assessment. In the event that mitigation is required to reduce potentially significant impacts from occurring, the ISAG provides recommendations such as, avoidance, capping or covering, and partial or total salvage (Ventura County 2011).

The 2040 General Plan also includes several policies related to archaeological resources. These policies further described above in “General Plan Update Policies and Implementation Programs,” include COS-4.1, COS-4.2, COS-4.4, and COS-4.7. Policies COS-4.1 and COS-4.2, require County maintenance of an archaeological resources inventory and preservation of known resources.

Policies COS-4.1 and COS-4.2 do not fully ensure protection archaeological resources, but rather, provide best practices and preservation options for previously identified, known resources. Policy COS-4.4 requires discretionary development projects to evaluate impacts to archaeological resources, be designed to avoid impacts, and be mitigated to the extent feasible. However, Policy COS-4.4 does not clearly identify the standards to which potential archaeological resources shall be assessed and does not provide guidance for consistent application of the policy. Similarly, Policy COS-4.7 requires coordination with the Cultural Heritage Board, however, the requirement to coordinate does not clearly identify the nature of coordination or the desired outcome.

The Ventura County Area Plan policies, listed above, contain additional requirements and guidance to protect archaeological resources. Some examples include resource avoidance, siting requirements, and implementation of project-specific mitigation measures. As described above in “Background Report Setting Updates,” the Ventura County Coastal and Non-Coastal Zoning Ordinance, as well as the Area Plans, apply to discretionary development within specific areas of the County (e.g., Ojai Valley Plan Area, Piru Plan Area, etc.), or to specific types of development (e.g., emergency shelter and infrastructure).

As previously described in Impact 4.5-1, higher intensity development under the 2040 General Plan would be concentrated within the Existing Community area designation (boundary) and Urban area designation (boundary) which are generally existing developed areas. However, lower intensity future development would be allowed to occur in undeveloped areas, such as under the Rural, Open Space, and Agricultural land use designations. Additionally, State and local regulations, requirements, and programs in place to reduce potential adverse impacts to archaeological resources. However, because of the programmatic level of analysis and because there is the possibility that future development under the 2040 General Plan could result in the discovery, damage, or alteration of an archaeological resource, full protection of these resources, (even with implementation of regulations, requirements, and local programs), cannot be guaranteed. Impacts would be **potentially significant**.

Mitigation Measures

Mitigation Measure CUL-1a: Revised Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation

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

Policy COS-4.4: Discretionary Development and Tribal, Cultural, Historical, Paleontological, and Archaeological Resource Preservation

The County shall require that all discretionary development projects be assessed for potential tribal, cultural, historical, paleontological, and archaeological resources by a qualified professional and shall be designed to protect existing resources, and shall avoid potential impacts ~~to these resources whenever~~ to the maximum extent feasible. Whenever possible, significant impacts shall be reduced to a less-than-significant level through the application of feasible mitigation and/or shall be mitigated by extracting extraction of maximum recoverable data.

Mitigation Measure CUL-1b: New Implementation Program COS-X: Cultural Records Research

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program COS-X: Cultural Records Research

As part of a discretionary application process, project applicants (Ventura County for County projects) shall initiate a records search and Sacred Lands File search with the South Central Coastal Information Center.

Mitigation Measure CUL-1c: New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures

For discretionary projects, the County shall require the following:

- ▶ Projects shall be designed to protect existing resources and shall avoid potential impacts to the maximum extent feasible.
- ▶ If determined necessary by the County, an archaeological, paleontological, and/or Native American monitor shall be retained to monitor ground-disturbing activities during construction.
- ▶ If any materials or artifacts are discovered during ground disturbance and/or construction activities, construction shall halt until a qualified archaeologist, paleontologist, or Native American monitor can access the discovery. A report or memorandum shall be prepared by the qualified monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources. Recommendations or mitigation identified by the qualified monitor shall be implemented prior to commencing or continuing project activities and/or construction.

Significance after Mitigation

Implementation of Mitigation Measures CUL-1a, 1b, and 1c would require that discretionary development projects protect existing resources, avoid potential impacts to the maximum extent feasible, and implement feasible mitigation measures to reduce impacts to less than significant. However, it is still possible that future development resulting from the 2040 General Plan could uncover previously unknown archaeological resources during project-level construction activities, the discovery of which may result in damage, destruction, or changes in significance, of the resource. Therefore, the full protection of archaeological resources cannot be guaranteed at this program level of analysis. Impacts to archaeological resources would be **significant and unavoidable**.

Impact 4.5-2: Substantial Adverse Change in the Significance of a Historic Resource Pursuant to PRC 5024.1 and CEQA

As described in Section 8.6, “Cultural, Historical, Paleontological, and Archaeological Resources” of the Background Report (Appendix B), there are significant historic resources within Ventura County, including federally, State, and locally recognized resources. Many of these resources meet the definition of historic resource under Section 15064.5(a) of the CEQA

Guidelines and under PRC 5024.1. To date, over 282 historic sites have been documented within Ventura County. As of January 2018, 36 sites are listed in the NRHP, one site is listed as National Historic Landmark (Rancho Camulos), 46 sites are listed on the California Register of Historical Resources, and 14 sites are designated as California Landmarks. Additionally, 177 sites are designated as Ventura County Historical Landmarks, 11 sites are listed on the Ventura County Historical Points of Interest, and 566 sites are listed as Ventura County Sites of Merit.

As described in Impact 4.5-1, future development that could be accommodated under the 2040 General Plan within urban or existing developed areas (where existing historic features, buildings, and structures are located). Further, future development under the 2040 General Plan could be in areas with known historical sites, or in areas where structures have not yet been evaluated for historical significance. Buildings that are over the age of 50 years old and are proposed for modification or alteration would require future evaluations to determine eligibility for California Register of Historical Resources (CRHR) and/or NRHP listing, and some of these buildings could be determined to be historically significant. The ISAG includes protocol and guidance for evaluating potentially historic resources, including preparation of historic resources report, as determined by the Cultural Heritage Board.

Because future development under the 2040 General Plan may be in areas where listed, eligible, or not-yet-evaluated historic resources would be located, damage to or destruction of a building or structure that is a designated historic resource, eligible for listing as a historic resource, or a potential historic resource that has not yet been evaluated, could result in a change in its historical significance.

As detailed in Section 8.6, “Cultural, Historical, Paleontological, and Archaeological Resources,” of the Background Report (Appendix B), there are several federal, State, and local regulations and programs in place to protect historical resources in the county including:

- ▶ Section 106 of the National Historic Preservation Act,
- ▶ CEQA Guidelines Section 15064.5,
- ▶ PRC Section 5024.1,
- ▶ Ventura County Coastal Zoning Ordinance,
- ▶ Ventura County Non-Coastal Zoning Ordinances,
- ▶ the Ventura County ISAG,
- ▶ the Ventura County Cultural Heritage Ordinance, and
- ▶ Ventura County Area Plans.

As previously described in Impact 4.5-1, Section 106 of the National Historic Preservation Act and accompanying regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the main federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed in, or may be eligible for listing in, the NRHP.

CEQA requires public agencies to consider the effects of their actions on “historical resources.” Pursuant to PRC Section 21084.1, a “project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” Under CEQA Guidelines Section 15064.5(1), historical resources include those listed or determined eligible for listing in the CRHR, those listed in an local register, meeting the requirements of PRC 5024.1, or an object, building, site, area, place, record, or manuscript that has been determined to be significant by a lead agency. Generally, a resource is considered to be historically significant if it meets the criteria for CRHR listing (as defined in PRC 5024.1).

PRC 5024.1 established the CRHR. The California Register is an authoritative guide in California to be used by State and local agencies, private groups, and citizens to identify the State’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.

The Ventura County Coastal and Non-Coastal Zoning Ordinances (previously described in Impact 4.5-1) contain measures for protection of historic resources through project siting, avoidance, and preservation. (Ventura County 2017a, 2017b).

The Ventura County ISAG provides the following guidance for assessing and determining impacts to historical resources: conducting records searches with the appropriate CHRIS information center, preparation of a historic resources report by a qualified architectural historian, avoidance of known resources, and compliance with Secretary of the Interior’s Standards for the Treatment of Historic Properties (Ventura County 2011).

The Ventura County Cultural Heritage Board Ordinance establishes, updates, and maintains a list of buildings, structures, objects, and sites of historical, architectural, community, or aesthetic merit. The Board holds several responsibilities related to the preservation and protection of historical resources, including but not limited to, provision of resource recommendations, maintenance of the Local Register of Historic Places, recommendations for zoning, designation of cultural heritage sites, and conducting surveys (Ventura County n.d.).

Additionally, the 2040 General Plan includes several policies related to historical resources. Policies COS-4.1, COS-4.2, COS-4.3, COS-4.4, and COS-4.5, COS-4.6, and COS 4.7 would require maintenance of a historical resources inventory, preservation of known resources, historic landmark designations and preservations, project-level environmental review, coordination with the Cultural Heritage Board, as well as encouragement of adaptive reuse and incorporation of architectural designs that reflect historic values.

The Ventura County Area Plan policies, listed above, contain additional requirements and guidance to protect historic resources. Some examples include resource avoidance, siting requirements, and implementation of project-specific mitigation measures. As described above in “Background Report Setting Updates,” the Ventura County Coastal and Non-Coastal Zoning Ordinance, as well as the Area Plans, apply to discretionary development within specific areas of the County (e.g., Ojai Valley Plan Area, Piru Plan Area, etc.), or to specific types of development (e.g., emergency shelter and infrastructure). Therefore, it is possible that future development resulting from the 2040 General Plan update would not be covered under these programs and subsequently would not be required to comply with the regulations and policies outlined in these programs. Thus, it cannot be guaranteed at this time that historic resources would be protected and/or avoided under all circumstances.

While the previously identified regulations, requirements, programs, and policies aim to protect historical resources, they do not fully ensure that no adverse impacts would occur to listed, eligible, or not yet evaluated historic resources. Further, it may not be feasible to design all future development that could occur under the 2040 General Plan such that it avoids alteration of significant historical resources. Therefore, because existing County programs and policy documents, in addition to the 2040 General Plan policies, would not guarantee full protection or avoidance of identified resources in all circumstances, impacts to historical resources would be **potentially significant**.

Mitigation Measures

Mitigation Measure CUL-1a: Revised Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation

Mitigation Measure CUL-1b: New Implementation Program COS-X: Cultural Records Research

Mitigation Measure CUL-1c: New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures

Mitigation Measure CUL-2: Revised Policy COS-4.7: Cultural Heritage Board Review

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

Policy COS-4.7: Cultural Heritage Board Review

Prior to environmental review of discretionary development projects, the County shall initiate a records search request with the South Central Coastal Information Center and coordinate with the Cultural Heritage Board to identify sites of potential archaeological, historical, tribal cultural and paleontological significance, to ensure that all known resources have been properly identified. Should a site of archaeological, tribal, architectural, or historical significance be identified, the County shall provide an opportunity for the Cultural Heritage Board to include recommendations specific to the discretionary project and identified resource(s). If it is determined during the review that determine whether a site has potential archaeological, tribal, architectural, or historical significance, and provide this information shall be provided to the County Cultural Heritage Board for evaluation, and recommendation Recommendations identified by the Cultural Heritage Board shall be provided to the appropriate decision-making body.

Mitigation Measure CUL-3: New Implementation Program COS-X: Project-Level Historic Surveys and Protection of Historic Resources

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program COS-X: Project-Level Historic Surveys and Protection of Historic Resources

During project-specific environmental review of discretionary development, the County shall define the project's area of potential effect for historic buildings and structures. The County shall determine the potential for the project to result in historic resource impacts, based on the extent of ground disturbance and site modification anticipated for the project. The potential for adverse impacts to historic resources shall also be determined pursuant to the requirements and protocol set forth in the Ventura County ISAG and Cultural Heritage Board Ordinance.

Before altering or otherwise affecting a building or structure 50 years old or older, the project-applicant shall retain a qualified architectural historian according to the Secretary of the Interior Standards, to record it on a California Department of Parks and Recreation DPR 523 form or equivalent documentation, if the building has not previously been evaluated. Its significance shall be assessed by a qualified architectural historian, using the significance criteria set forth for historic resources under CEQA Guidelines Section 15064.5. The evaluation process shall include the development of appropriate historical background research as context for the assessment of the significance of the structure in the county and the region. For buildings or structures that do not meet PRC 5024.1 or the CEQA criteria for historical resource, no further mitigation is required.

For a building or structure that qualifies as a historic resource, the architectural historian and the County shall consult to consider measures that would enable the project to avoid direct or indirect impacts to the building or structure. These could include preserving a building on the margin of the project site, using it “as is,” or other measures that would not alter the building. If the project cannot avoid modifications to a historic building or structure, the following shall be considered:

- 1) If the building or structure can be preserved on site, but remodeling, renovation or other alterations are required, this work shall be conducted in compliance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties.
- 2) If a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, the County shall ensure that a qualified architectural historian thoroughly documents the building and associated landscape and setting. Documentation shall include still and video photography and a written documentary record/history of the building to the standards of the Historic American Building Survey or Historic American Engineering Record, including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. The record shall be prepared in consultation with State Historic Preservation Officer and filed with the Office of Historic Preservation. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site specific and comparative archival research, and oral history collection as appropriate.
- 3) If preservation and reuse at the site are not feasible, the historical building shall be documented as described in item (2) and, when physically and financially feasible, be moved and preserved or reused.
- 4) If, in the opinion of the qualified architectural historian, the nature and significance of the building is such that its demolition or destruction cannot be fully mitigated through documentation, the County shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications to the proposed project that would allow the structure to be preserved intact. These could include project redesign, relocation or abandonment. If no such measures are feasible, the historical building shall be documented as described in item (2).

Significance after Mitigation

Implementation of Mitigation Measures CUL-1a, 1b, and 1c would require that discretionary development projects protect existing resources, avoid potential impacts to the maximum

extent feasible, and implement feasible mitigation measures to reduce impacts to less than significant.

Implementation of Mitigation Measure CUL-2 would require the identification of listed, eligible, or unevaluated sites in coordination with the Cultural Heritage Board. Further, policy modifications provide the opportunity for the Cultural Heritage Board to offer project-level recommendations and guidance to ensure that efforts are made to avoid, preserve, or otherwise mitigate impacts to historic resources.

Implementation of Mitigation Measure CUL-3 provides on-site preservation guidance, and in the event that a structure or resource cannot be preserved, it ensures that actions would be taken to record, evaluate, avoid, or otherwise treat a listed, eligible, or previously unevaluated historic resource appropriately, in accordance with pertinent laws and regulations.

Through compliance with existing federal, State, and local regulations, and implementation of mitigation measures, the potential for adverse effects to historic resources would be substantially reduced. However, preservation, reuse, maintenance, and/or avoidance of historical resources may not always be feasible, and recordation of a significant historic resource does not constitute adequate mitigation for a substantial adverse change to that resource. Therefore, because the potential for permanent loss of a historic resource cannot be precluded, impacts to historical resources are considered **significant and unavoidable**.

Impact 4.5-3: Substantial Adverse Change in the Significance of a Tribal Cultural Resources

Evidence of prehistoric occupation in the county dates back several thousand years. As described in Section 8.6, “Cultural, Historical, Paleontological, and Archaeological Resources” of Background Report (Appendix B), the county is located in an area that is culturally significant for tribal cultural resources and has one of the densest Native American populations in North America. As described in Impact 4.5-1, archaeological sites, including tribal cultural resources associated with the Native American heritage of the Chumash people, exist throughout the county. These sites have been identified in areas where former water and food sources existed. Because many Chumash sites have been identified within the plan area, the potential for discovering additional sites is considered high.

As previously described in “Environmental Setting,” in 2016 the NAHC provided the County a list of tribes affiliated with the plan area to contact. The County initiated consultation pursuant to AB 52 in 2017 with the Barbareño/Ventureño Band of Mission Indians and in 2019 with the Fernandeño Tataviam Band of Mission Indians. Consultation efforts with the Fernandeño Tataviam Band of Mission Indians have revealed that culturally sensitive tribal areas are present within the southern portion of the plan area. In September 2019, the Fernandeño Tataviam Band of Mission Indians requested review of the draft EIR and Archaeological/Cultural Resource Reports considered for the proposed 2040 General Plan, when available. As of January 2020, AB 52 consultation is still underway.

Future development that could be accommodated under the 2040 General Plan is described in Impact 4.5-1. Generally, discoveries of tribal cultural resources would be more likely to occur in areas that have been previously undeveloped, such as rural areas of the county. However, areas where native fill or soil is present may include previously undiscovered resources as well, which could include existing developed areas and undeveloped areas. In addition, it is possible that tribal cultural resources could be identified or discovered during analysis and/or development of future development under the 2040 General Plan.

California law recognizes the need to protect tribal cultural resources from inadvertent destruction and the procedures required for the treatment of tribal cultural resources, which are contained in PRC Section 21080.3.2 and Section 21084.3(a). Further, there are local regulations and programs in place to protect tribal cultural resources within the county. Relevant regulations and programs include:

- ▶ Ventura County Coastal Zoning Ordinance,
- ▶ Ventura County Non-Coastal Zoning Ordinance, and
- ▶ Ventura County Area Plans.

The Ventura County Coastal and Non-Coastal Zoning Ordinances contain measures for protection of cultural resources (including tribal cultural resources) through project siting, avoidance, preservation, and requiring mitigation if necessary (Ventura County 2017a, 2017b).

The 2040 General Plan includes several policies and implementation programs that would further reduce potential impacts to tribal cultural resources. Policies COS-4.1, COS-4.2, COS-4.4, COS-4.6, and COS 4.7 require maintenance of a cultural resources inventory, preservation of known resources, project-level environmental review, coordination with the Cultural Heritage Board, as well as encouraging future discretionary projects to incorporate architectural designs that reflect cultural values. While 2040 General Plan policies may aim to protect cultural resources, they do not clearly identify the protection of tribal cultural resources, available informational resources, and appropriate coordination efforts. As a result, these policies do not ensure that no adverse impacts would occur to known or yet unknown tribal cultural resources.

The Area Plan policies, listed above, contain additional requirements and guidance to protect tribal cultural resources. Some examples include resource avoidance, Native American consultation, and implementation of tribal monitoring during project-level construction activities.

As previously discussed, the Ventura County Coastal and Non-Coastal Zoning Ordinance, as well as the Area Plans, apply to discretionary development based on locations, or the specific type of development proposed (e.g., emergency shelter and infrastructure). Therefore, it is possible that future development resulting from the 2040 General Plan would not be covered under these programs and subsequently would not be required to comply with the regulations and policies outlined in these programs. Thus, it cannot be precluded that tribal cultural resources would be protected and/or avoided through implementation of the measures set forth in these programs. Because 2040 General Plan policies do not clearly define protection of tribal cultural resources, existing County regulations and policy documents, in addition to 2040 General Plan policies and implementation programs, would not fully ensure protection of known or unknown tribal cultural resources. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure CUL-1a: Revised Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation

Mitigation Measure CUL-1b: New Implementation Program COS-X: Cultural Records Research

Mitigation Measure CUL-1c: New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures

Mitigation Measure CUL-2: Revised Policy COS-4.7: Cultural Heritage Board Review

Mitigation Measure CUL-4: Revised Policy COS-4.1: Cultural, Historical, Paleontological, and Archaeological Resources Inventory

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

Policy COS-4.1: Tribal, Cultural, Historical, Paleontological, and Archaeological Resources Inventory

The County shall maintain an inventory of tribal, cultural, historical, paleontological, and archaeological resources in Ventura County based on project studies and secondary resources, including record studies and reports filed with natural history programs, the California Historical Resources Information System and the Native American Heritage Commission.

Mitigation Measure CUL-5: Revised Policy COS-4.2: Cooperation for Cultural, Historical, Paleontological, and Archaeological Resource Preservation

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

Policy COS-4.2: Cooperation for Tribal, Cultural, Historical, Paleontological, and Archaeological Resource Preservation

The County shall cooperate with cities, special districts, ~~other~~ appropriate organizations, including the Native American Heritage Commission, and private landowners to identify known tribal cultural, archaeological, historical, and paleontological resources. If necessary, the County shall engage in consultation with local tribes and preservation groups, to and preserve the county's tribal cultural, historical, paleontological, and archaeological identified resources within the county.

Significance after Mitigation

Implementation of Mitigation Measure CUL-4 would provide clearer language identifying the maintenance of a tribal cultural resource inventory. Further, policy revisions indicate that the inventory shall include recordation of previous studies and reports filed with CHRIS and the NAHC. Availability of this information, in addition to previous studies within the county, would allow for any known tribal cultural resources to be identified prior to project-level analysis.

Implementation of Mitigation Measure CUL-5 would provide clearer language related to the preservation of tribal cultural resources, identify coordination with the NAHC, and require when necessary consultation with tribal and preservation groups.

Implementation of Mitigation Measures CUL-1a, 1b, and 1c would require that discretionary development projects protect existing resources, avoid potential impacts to the maximum extent feasible, and implement feasible mitigation measures to reduce impacts to less than significant.

Implementation of Mitigation Measure CUL-2 also would require the identification of listed, eligible, or unevaluated sites in coordination with the Cultural Heritage Board. Further, policy modifications provide the opportunity for the Cultural Heritage Board to offer project-level

recommendations and guidance to ensure that efforts are made to avoid, preserve, or otherwise mitigate impacts to tribal cultural resources.

Through compliance with existing regulations related to tribal cultural resources, in addition to implementation of these mitigation measures, impacts to tribal cultural resources would be substantially reduced. However, it is still possible that future development under the 2040 General Plan could result in the discovery of tribal cultural resources through project-level construction activities. Discovery of such resources could result in damage, destruction, or changes in significance of the resource. Therefore, the preservation and protection of unknown tribal cultural resources cannot be guaranteed. This impact would be **significant and unavoidable**.

Impact 4.5-4: Result in Grading and Excavation of Fossiliferous Rock or Increase Access Opportunities and Unauthorized Collection of Fossil Materials from Valuable Sites

As described in Section 8.6, “Cultural, Historical, Paleontological, and Archaeological Resources,” of the Background Report (Appendix B), the county contains a variety of paleontological resources. Specifically, the coastal and interior zone of the county contain areas with marine and terrestrial fossils. As of January 2017, 316 vertebrate fossil localities have been documented within the county.

Future development that could be accommodated under the 2040 General Plan is described in Impact 4.5-1. Similar to archaeological resources, impacts to paleontological resources would be more likely to occur in areas that are previously undeveloped or are located in more rural portions of the county. However, it is possible that such resources could be discovered through project-level construction in existing developed areas that contain native fill or soil. Therefore, adverse effects to paleontological resources could occur through project-level construction activities, such as earth-moving and ground disturbance. Specifically, grading and excavation of known fossiliferous rock would result in the loss of known or yet undiscovered paleontological resources. Further, unsecured areas could result in increased access to paleontologically sensitive areas and subsequently, the unauthorized collection of fossil materials. As a result, known and yet undiscovered resources could be lost and/or destroyed.

As described in Section 8.6, “Cultural, Historical, Paleontological, and Archaeological Resources” of the Background Report (Appendix B), there are State and local regulations and guidance in place to protect paleontological resources within the county. Relevant programs include:

- ▶ Ventura County Coastal Zoning Ordinance,
- ▶ Ventura County Non-Coastal Zoning Ordinance, and
- ▶ the 2011 Ventura County ISAG.

The Ventura County Coastal and Non-Coastal Zoning Ordinances contain measures for the avoidance and protection of paleontological resources through project-specific siting, as well as avoidance and preservation of known or identified resources (Ventura County 2017a, 2017b).

The Ventura County ISAG contains guidance of assessing and determining impacts to paleontological resources. These include conducting preliminary geological assessments and

consultant or professional geologist-prepared assessments (including literature review, surveys, and geotechnical studies). In the event that mitigation is required to reduce potentially significant impacts from occurring, the ISAG provides recommendations such as, construction monitoring, documentation, and resource collection (Ventura County 2011).

The 2040 General Plan includes several policies related to paleontological resources. As described above in “General Plan Update Policies and Implementation Programs,” Policies COS-4.1, COS-4.2, and COS-4.4 require maintenance of a paleontological resource inventory, preservation of known resources, and project-level environmental review. While these 2040 General Plan policies may aim to protect paleontological resources, they do not clearly identify available informational resources for inventory maintenance, appropriate coordination efforts, or the standards to which paleontological resources shall be assessed.

The Ventura County Area Plan policies, listed above, contain additional requirements and guidance to protect paleontological resources. Some examples include resource avoidance, siting requirements, and implementation of project-specific mitigation measures. As described above in “Background Report Setting Updates,” the Ventura County Coastal and Non-Coastal Zoning Ordinance, as well as the Area Plans, apply to discretionary development within specific areas of the County (e.g., Ojai Valley Plan Area, Piru Plan Area), or to specific types of development (e.g., emergency shelter and infrastructure). Therefore, it is possible that future development resulting from the 2040 General Plan update would not be covered under these programs and subsequently would not be required to comply with the regulations and policies outlined in these programs. Thus, it cannot be precluded that paleontological resources would be protected and/or avoided.

For these reasons, existing county programs and requirements, in addition to the identified 2040 General Plan policies, would not fully ensure the protection of fossiliferous rock nor would they preclude the unauthorized access and/or collection of fossil materials from valuable sites. Further, it may not be feasible to design a project such that it avoids adverse impacts to paleontological resources or prevents the unauthorized access to fossil materials. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure CUL-1a: Revised Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation

Mitigation Measure CUL-1b: New Implementation Program COS-X: Cultural Records Research

Mitigation Measure CUL-1c: New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures

Mitigation Measure CUL-4: Revised Policy COS-4.1: Cultural, Historical, Paleontological, and Archaeological Resources Inventory

Mitigation Measure CUL-5: Revised Policy COS-4.2: Cooperation for Cultural, Historical, Paleontological, and Archaeological Resource Preservation

Mitigation Measure CUL-6: New Implementation Program COS-X: Implement Project-Level Security Measures
The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program COS-X: Implement Project-Level Security Measures

During project-level ground disturbance activities for discretionary development, in areas where paleontologically rich sites are known to be present, project sites shall be secured during non-construction hours to ensure that the unauthorized access and the unlawful curation of fossil materials does not occur. Such security measures may include construction fencing, unauthorized access signage, security lighting, and security cameras. For large-scale development, a security plan may be prepared prior to construction activities to detail security measures and protocol for the project site.

Significance after Mitigation

Implementation of Mitigation Measures CUL-1a, 1b, and 1c would require that discretionary development projects protect existing resources, avoid potential impacts to the maximum extent feasible, and implement feasible mitigation measures to reduce impacts to less than significant.

Implementation of Mitigation Measure CUL-4 would provide clearer language identifying the maintenance of a paleontological resource inventory and indicate that inclusion of previous studies and reports filed with natural history programs and CHRIS. Availability of this information, in addition to previous studies within the county, would allow for any known paleontological sites and resources to be identified during project-level analysis.

Implementation of Mitigation Measure CUL-5 would provide clearer language related to the preservation of paleontological resources and encourages consultation with local preservation groups. Implementation of Mitigation Measure CUL-6 would require that proper security measures be taken during project-level development to prevent the unauthorized access to paleontologically rich sites and the unlawful collection of fossil materials

Through compliance with existing regulations, implementation of the mitigation measures described above, the potential for adverse effects related to the loss of paleontological resources (either through construction activities or the unauthorized access and curation of fossil materials) would be substantially reduced. However, protection of paleontological resources may not always be feasible, as it is possible that materials and sites could be accessed unlawfully or could not be entirely avoided during construction activity. Therefore, because the potential for permanent loss of a paleontological resource cannot be guaranteed, impacts to paleontological resources, including fossiliferous rock and fossil sites would be **significant and unavoidable**.

4.6 ENERGY

This section evaluates the potential effects of implementing the 2040 General Plan on energy consumption including whether it would result in an environmental impact due to the wasteful, inefficient or unnecessary consumption of energy resources and whether it would conflict with or obstruct State or local plans for renewable energy and energy efficiency. As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments on the notice of preparation both expressed support for transitioning from natural gas to renewable energy sources and the importance of local energy production. These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A. For a discussion of the potential impacts of the 2040 General Plan related to oil and gas extraction, refer to Section 4.12, “Mineral and Petroleum Resources,” of this draft EIR.

4.6.1 Background Report Setting Updates

REGULATORY SETTING

In addition to the information provided in Chapter 12, “Climate Change,” the Background Report (Appendix B), the following information is relevant to understanding the potential energy impacts of implementation of the 2040 General Plan:

Ventura County Regional Energy Alliance

The Ventura County Regional Energy Alliance (VCREA) is an organization funded by the California Public Utilities Commission (CPUC), via investor owned utilities, that has served as a regional Joint Powers Authority since 2002 to address energy planning, conservation and reliability. VCREA’s mission is “to establish Ventura County, its communities and neighboring regions as the leader in developing and implementing durable, sustainable energy initiatives that support sensible growth, healthy environment and economy, enhanced quality of life, and greater self-reliance for the region.” These objectives are to be achieved by “reducing energy demand and increasing energy efficiency and advancing the use of clean, efficient and renewable local resources” (VCREA 2019a). Goals for the organization include:

- ▶ Lead and coordinate regional integrated energy resource planning.
- ▶ Develop a long-term, sustainable energy strategy and implementation plan.
- ▶ Develop regional capability to respond to energy emergencies and short-term disruptions.
- ▶ Increase awareness of and access to conservation, efficiency, and renewable opportunities.
- ▶ Add value to, but not duplicate, services offered by public utilities and other regional providers.

- ▶ Inform decision makers and stakeholders of energy policy, regulatory, and market changes.
- ▶ Empower Ventura County to lead in research, development, demonstration, innovation, and commercialization of sustainable energy technologies.

VCREA's agency partners at the regional level include the cities of Camarillo, Fillmore, Ojai, Oxnard, Port Hueneme, Santa Paula, Simi Valley, Thousand Oaks, and Ventura. Other regional partners include the South County Energy Efficiency Partnership, the San Luis Obispo Regional Energy Alliance, emPower Central Coast, Central Coast Energy Alliance, and the U.S. Green Building Council central coast chapter. Utility partners include Southern California Edison (SCE) and Southern California Gas Company (SoCalGas). Statewide organizations listed as VCREA partners include the California Energy Commission (CEC), the Local Government Commission, the Institute for Local Government, the CPUC's Statewide Energy Efficiency Collaborative, and the California Green Business Network (VCREA 2019b).

California Renewables Portfolio Standard Program

Senate Bill (SB) 1078 (Chapter 516, Statutes of 2002) established a renewable portfolio standard (RPS) for Statewide retail electricity, requiring that utilities procure 20 percent of their marketed electricity from renewable energy sources. Subsequent legislation increased the percentage of renewable energy required, set specific target years, and expanded the types of entities covered under the RPS. The State has reported that 34 percent of Statewide retail electricity was sourced from certified renewable sources in 2018 (CEC 2019). The current RPS targets, revised in 2018 under SB 100, require that electric utilities provide 44 percent of retail sales from renewable energy sources by December 31, 2024, 50 percent by December 31, 2026, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. SB 100 also introduced a requirement that 100 percent of retail sales of electricity come from zero-carbon energy sources by December 31, 2045.

Integrated Energy Policy Report

Senate Bill (SB) 1389 (Chapter 568, Statutes of 2002) required the CEC to: “conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The Energy Commission shall use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State’s economy, and protect public health and safety” (Public Resources Code Section 25301(a)). This work is published biannually in an Integrated Energy Policy Report (IEPR), with updates published in intervening years. The latest full version of the report was published in 2017, and an update was published in 2018 (CEC 2017, 2018).

The 2017 IEPR provides a summary of priority energy issues currently facing the State, outlining strategies and recommendations to further the State’s goal of ensuring reliable, affordable, and environmentally responsible energy sources. Topics covered in the report include:

- ▶ progress toward Statewide renewable energy targets;
- ▶ issues facing future renewable development;
- ▶ efforts to increase energy efficiency in existing and new buildings;
- ▶ progress by utilities in achieving energy efficiency targets and potential;
- ▶ improving coordination among the State’s energy agencies;

- ▶ streamlining power plant licensing processes;
- ▶ results of preliminary forecasts of electricity, natural gas, and transportation fuel supply and demand;
- ▶ future energy infrastructure needs;
- ▶ research and development efforts for Statewide energy policies; and
- ▶ issues facing California's power plants.

Warren-Alquist Act

The 1974 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission, now known as the CEC. The Act was created in response to the State legislature's review of studies projecting an increase in Statewide energy demand, which would potentially encourage the development of electricity producing power plants in environmentally sensitive areas. The Act introduced State policy for siting power plants to reduce potential environmental impacts, and additionally sought to reduce demand for these facilities by directing CEC to develop Statewide energy conservation measures to reduce wasteful, inefficient, and unnecessary uses of energy. Conservation measures established by the Act included design standards for energy conservation in buildings, resulting in the creation of the Title 24 Building Energy Efficiency Standards (California Energy Code) and Title 20 Appliance Efficiency Regulations. Approval of the Act also introduced into Public Resources Code Section 21100 a requirement for lead agencies preparing EIRs to include a detailed statement about proposed measures to reduce the wasteful, inefficient and unnecessary consumption of energy necessary to minimize significant effects on the environment.

Senate Bill 350: Clean Energy and Pollution Reduction Act of 2015

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030. Achieving these savings are the responsibility of the State's regulated utilities, who submit to the CPUC an Integrated Resource Management Plan (IRP) describing how energy efficiency savings will be achieved through a variety of programs.

Assembly Bill 2076

Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000), required the CEC to perform studies analyzing the feasibility of a strategic fuel reserve to serve as a contingency for possible shortages of electrical energy or fuel supplies. As part of this effort the CEC and CARB prepared a joint agency report, *Reducing California's Petroleum Dependence*. The introduction to this report states that need to reduce dependence on petroleum is due, in part, to the Statewide demand for fossil fuels outpacing the refining capacity of the State. This increased demand is met through the import of petroleum products from outside California, creating long-term susceptibility to gasoline price volatility. This report prepared for the Governor and Legislature recommended the following strategies for reducing the State's dependence on petroleum.

- ▶ Reduce demand for on-road gasoline and diesel to 15 percent below the 2003 demand level by 2020 and maintain that level for the foreseeable future.
- ▶ Work with the California delegation and other states to establish national fuel economy standards that double the fuel efficiency of new cars, light trucks and SUVs.

- ▶ Establish a goal to increase the use of non-petroleum fuels to 20 percent of on-road fuel consumption by 2020 and 30 percent by 2030.

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan in partnership with CARB and in consultation with other State, federal, and local agencies. The plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes the costs and maximizes the economic benefits of in-State production. The plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce greenhouse gas (GHG) emissions, and increase in-State production of biofuels.

California Building Energy Efficiency Standards

The energy consumption of new residential and nonresidential buildings in California is regulated by the State's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). The California Energy Code was established by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and non-residential buildings. Implementation of these standards results in the generation of fewer GHG emissions during building operation. The CEC updates the California Energy Code every 3 years. The 2019 California Energy Code was adopted by the CEC on May 9, 2018 and will apply to projects constructed after January 1, 2020. The 2019 Code is designed to move the State closer to its zero-net energy goals for new residential development. It does so by requiring all new residences to install solar photovoltaic panels sized to offset all of the electricity needs of each residential unit (CCR, Title 24, Part 6, Section 150.1(c)4). The Code is enforced through the local plan check and building permit processes. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided that these standards exceed those provided in the California Energy Code.

ENVIRONMENTAL SETTING

In addition to the information provided in Chapter 12, "Climate Change," the Background Report (Appendix B), the following information is relevant to understanding the potential energy impacts of implementation of the 2040 General Plan:

Electricity Services

Electric services in unincorporated Ventura County are provided by SCE and the Clean Power Alliance (CPA). SCE is an Investor Owned Utility (IOU) that provides electricity service and distribution to residents and businesses in Ventura County. CPA is a Community Choice Aggregation (CCA) that provides electricity service as an alternative to SCE. CPA was founded in 2017 as a Joint Powers Authority operated by several public agencies in Southern California. In 2018, the County became a member of the organization, and in early 2019 transferred service for most residential and commercial electricity customers from SCE to this CPA. Table 4.6-1 provides information on the distribution of customers receiving electric service in the county. This information is relevant because CCAs are marketed as utilities that procure electricity with a greater share of zero carbon and renewable energy sources than IOUs. For the county this is true, as shown in 4.6-2 which itemizes the power content of

electricity sold by each utility through their program offerings. CPA's "Green Power" product is derived from 100 percent wind energy, and serves 83.1 percent of eligible customers in the county, as of August 2019. For comparison, the share of electricity generated by SCE using renewable energy or zero carbon sources is 46 percent and serves 11.9 percent of eligible customers in the county as of August 2019. Prior to the availability of CPA in early 2019, SCE's electricity generation served all customers in the county.

Table 4.6-1 Unincorporated Ventura County Electric Utility Program Enrollment

Electric Utility / Rate Option	Residential Customers		Non-Residential Customers		Total Customers (Residential and Non-Residential)	
	%	Number	%	Number	%	Number
Southern California Edison / Standard	10.7	3,349	17.1	1212	11.9	4,561
Clean Power Alliance / Green Power	84.1	26,257	78.6	5,586	83.1	31,843
Clean Power Alliance / Lean Power	4.3	1,345	3.1	217	4.1	1,562
Clean Power Alliance / Clean Power	0.8	262	1.3	95	<1	357
Total Accounts		31,214		7,110	100	38,323
Total Clean Power Alliance	89.3	27,864	83.0	5,898	88.1	33,762

Notes: Data are from August 2019. Clean Power Alliance Green Power is the default rate option for enrollment in the program. Other rate options are the result of customers opting out.

Source: Clean Power Alliance 2019

4.6.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

Energy consumption resulting from future development under the 2040 General Plan would include energy directly consumed for space heating and cooling, electricity- and gas-powered equipment (including industrial equipment), and interior and exterior lighting of buildings (residential and commercial) in the plan area. Indirect energy consumption resulting from future development under the proposed plan would include fuels consumed for the generation of electricity at power plants and the energy used for the treatment of water and the transportation of water to and from the plan area. Transportation-related energy consumption includes the fuels and electricity used to power automobiles, trucks, busses, railways, ridesharing. It also includes heavy duty mobile machinery, such as farm equipment and forklifts. Energy would also be consumed by equipment and vehicles used during construction and maintenance of roadways, buildings, and landscaping. As a general plan, a programmatic approach is used for evaluating potential impacts that relies primarily on a qualitative analysis supported by figures showing levels of fuel consumption.

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on the County’s adopted ISAG, which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project’s impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

The ISAG does not include thresholds for analyzing energy impacts. Therefore, to develop a threshold of significance for this section of the draft EIR, the County has incorporated the 2019 revisions to Appendix G checklist questions VI.a and VI.b addressing wasteful, inefficient, or unnecessary energy consumption and conflicts with State or local plans for renewable energy or energy efficiency. Because the ISAG does not include threshold criteria for energy impacts, the State CEQA Guidelines checklist questions for energy contained in Appendix G, Section VI is used in this analysis.

For the purpose of this Draft EIR, implementation of the impact on energy resources would be significant if implementation of the 2040 General Plan would:

- ▶ Result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation that would cause a potentially significant effect on the environment.
- ▶ Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

ISSUES NOT DISCUSSED FURTHER

Section 15126.2(b) of the State CEQA Guidelines states that the consideration and discussion of energy impacts is subject to the rule of reason. The Statement of Reasons for Regulatory Action for the 2019 CEQA Guidelines clarifies the intent of this rule by stating “...the analysis of energy impacts is subject to the rule of reason and must focus on energy demand caused by the project. This sentence is necessary to place reasonable limits on the analysis. Specifically, it signals that a full ‘lifecycle’ analysis that would account for energy used in building materials and consumer products will generally not be required.”

This section does not analyze the potential, secondary environmental effects of energy consumption for topics already covered in other sections of this EIR, including air quality (Section 4.3), greenhouse gases (Section 4.8), transportation (Section 4.16), and utilities (section 4.17).

The Area Plans for communities of El Rio/Del Norte, Lake Sherwood/Hidden Valley, North Ventura Avenue, Oak Park, Ojai Valley, Piru, and Thousand Oaks were reviewed for policies and implementation programs specific to these Area Plans that would potentially have impacts on the environment with respect to energy. The 2040 General Plan would not result in substantive changes to Area Plan policies and implementation programs related to energy. The Area Plan policies and implementation programs related to these issues are consistent with the policies and implementation programs of the 2040 General Plan, which are addressed

in the following impact discussions. Therefore, the environmental effects of the Area Plan policies and implementation measures are not addressed separately in this section.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

2040 General Plan policies and implementation programs related to energy consumption and, specifically, the thresholds of significance identified above, include the following:

Land Use and Community Character Element

- ▶ **Policy LU-1.1: Guidelines for Orderly Development.** The County shall continue to promote orderly and compact development by:
 - working with cities in Ventura County and the Ventura Local Agency Formation Commission (LAFCo) to promote and maintain reasonable city boundaries and Spheres of Influence to prevent growth-inducing urban development in unincorporated areas, and
 - require unincorporated urban development to be located in areas designated as Existing Communities and unincorporated urban centers consistent with the Guidelines for Orderly Development and as defined in Policy LU-1.2. (RDR, IGC)
- ▶ **Policy LU-11.3: Design.** The County shall require new commercial and industrial developments to be designed to be generally compact, grouped and consolidated into functional units providing for sufficient off-street parking and loading facilities, maximize pedestrian and vehicle safety, reduce vehicle miles traveled (VMT), encourage electric vehicle charging, and minimize land use conflicts and traffic congestion. The County shall require that commercial and industrial discretionary development is designed to provide adequate buffering (e.g., walls, landscaping, setbacks) and operational conditions (e.g., hours of operation, and scheduling of deliveries) to minimize adverse impacts (e.g., noise, glare, and odors) on adjoining and adjacent residential areas.
- ▶ **Policy LU-11.4: Sustainable Technologies.** The County shall encourage discretionary development on commercial- and industrial- designated land to incorporate sustainable technologies, including energy- and water-efficient practices and low- or zero-carbon practices.
- ▶ **Policy LU-16.5: Multimodal Access to Commercial Development.** The County shall encourage discretionary commercial development to promote ease of pedestrian/bicycle access to encourage walk-in business, while providing sufficient off-street parking.
- ▶ **Policy LU-16.9: Building Orientation and Landscaping.** The County shall encourage discretionary development to be oriented and landscaped to enhance natural lighting, solar access, and passive heating or cooling opportunities to maximize energy efficiency.

Implementation Programs

- ▶ **Implementation Program A: Guidelines for Orderly Development Implementation.** The County shall continue to implement the Guidelines for Orderly Development and work with cities to promote orderly and compact, increased options for affordable housing, lower vehicle miles traveled, and limit sprawl.

Circulation, Transportation and Mobility Element

- ▶ **Policy CTM-2.1: Complete Streets.** The County shall prepare and adopt Complete Streets Design Guidelines to be used when constructing new roadways or improving existing roadways where Complete Streets would be appropriate/feasible. The Complete Streets Design Guidelines shall employ a context-sensitive approach to planning and designing the

road and street network to reflect the distinct agricultural, rural, or urban character of a particular location.

- ▶ **Policy CTM-2.8: Congestion Management Program and County Regional Network Consistency.** For those portions of the County's Regional Road Network currently not designated as part of the Congestion Management Program (CMP), the County shall coordinate with Ventura County Transportation Commission (VCTC) to formally designate applicable County maintained roadways as part of the CMP.
- ▶ **Policy CTM-2.11: Efficient Land Use Patterns.** The County shall establish land use patterns that promote shorter travel distances between residences, employment centers, and retail and service-oriented uses to support the use of public transportation, walking, bicycling, and other forms of transportation that reduce reliance on single-passenger automobile trips.
- ▶ **Policy CTM-2.12: Countywide Bicycle Lane and Trail System.** The County shall coordinate with the cities in the county and Ventura County Transportation Commission (VCTC) to plan and implement a system of bicycle lanes and multi-use trails that link the cities, unincorporated communities, schools including colleges and universities, commercial/retail, employment centers, health care service facilities, public transportation, and other points of interest.
- ▶ **Policy CTM-2.13: Transportation System Connectivity.** The County shall strive to eliminate "gaps" in roadways, bikeways, and pedestrian networks by planning for and seeking funding to construct necessary improvements to remove barriers and improve transportation system connectivity as well as connections that support first and last mile accessibility to and from public transportation.
- ▶ **Policy CTM-2.14: Bicycle Facility Design.** When designing new bicycle facilities, or modifying existing roadways with bicycle facilities, the County shall prioritize and install features to improve the safety and visibility of bicyclists.
- ▶ **Policy CTM-2.15: Bicycle/Pedestrian Design.** The County shall rely on the guidelines and design standards for bicycle and pedestrian facilities established by the California Manual on Uniform Traffic Control Devices (CAMUTCD) and supporting guidelines provided the Federal Highway Administration, Caltrans, and the American Association of State Highway and Transportation Officials (AASHTO).
- ▶ **Policy CTM-2.17: Support Regional Bicycle Infrastructure.** The County shall support efforts to improve infrastructure that will make biking more attractive to residents and tourists.
- ▶ **Policy CTM-2.18: Complete Streets Standards in Existing Communities.** The County shall require discretionary development in designated Existing Communities to construct roadways to urban standards and Complete Streets principles, including curb, gutter, sidewalks, and bike lanes when there is a nexus for improvement. The County shall rely on the guidelines and design standards for Complete Streets design established by the California Manual on Uniform Traffic Control Devices (CAMUTCD), Caltrans in the Highway Design Manual, and Complete Streets Guidelines (pursuant to Deputy Directive-64-R2), Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO).

- ▶ **Policy CTM-2.21: Pedestrian/Bicycle Conflicts along Overweight Vehicle Corridor and Surface Transportation Assistance Act (STAA) Truck Routes.** Within Existing Communities, the County shall provide/retrofit separated or buffered pedestrian and bicycle paths from the outside travel lane along County Road Network roads that are designated Overweight Vehicle Corridors and STAA designated Terminal Access Routes. Where the application or retrofitting of separated or buffered facilities is not feasible, the County shall prioritize alternative pedestrian and bicycle connections that encourage and attract pedestrian and bicycle traffic off designated Overweight Vehicle Corridors or STAA designated truck routes. (MPSP)
- ▶ **Policy CTM-2.22: Funding and Maintenance for Sidewalks.** The County shall seek funding sources first for construction of new sidewalks in designated disadvantaged communities and then for sidewalk maintenance, particularly in low-income areas.
- ▶ **Policy CTM-2.23: Intercommunity and Countywide Public Transportation System.** The County shall continue to work with Ventura County Transportation Commission (VCTC), Naval Base Ventura County, and local public transportation regional bus service providers to promote the expansion of a safe, efficient, convenient, integrated, and cost-effective intercommunity and countywide public transportation and bus service that provides county residents with access to employment, commercial services, health and medical facilities, social services, educational facilities and institutions, and personal business destinations.
- ▶ **Policy CTM-2.24: Non-Drivers Living in Rural Areas.** The County shall work with Ventura County Transportation Commission (VCTC) and local public transportation providers to address the needs of non-drivers living in rural areas to provide public transportation and paratransit service.
- ▶ **Policy CTM-2.25: Amtrak Service Improvements.** The County shall support the recommendations of the California State Rail Plan for Amtrak trains, including track and signalization upgrades, increasing service frequencies by adding additional round-trip service to regional destinations north and south of Ventura County, improving passenger information and comfort, and reducing travel time.
- ▶ **Policy CTM-2.26: Abandoned Railroad Rights-of-Way.** When railroad rights-of-way are abandoned, the County shall evaluate the feasibility of acquiring the land for public use as public transportation, bicycle, pedestrian, or equestrian paths.
- ▶ **Policy CTM-2.27: Discretionary Development and Conditions of Approval to Minimize Traffic Impacts.** The County shall require that discretionary development be subject to the following permit conditions of approval, where feasible, to minimize traffic impacts by incorporating pedestrian and bicycle pathways, bicycle racks and lockers, ridesharing programs, transit improvements (bus turnouts, shelters, benches), and/or transit subsidies for employees or residents of the proposed development.
- ▶ **Policy CTM-3.1: Bicycle Network Strategy and Prioritization.** The County shall identify and prioritize components of a bicycle network to increase public access and ridership on bicycle routes.
- ▶ **Policy CTM-3.2: Inclusive Bicycle Network.** The County shall develop a bicycle network for all user types and routes across the county.

- ▶ **Policy CTM-3.3: Regional Destination Focus for Bicycle Network.** The County shall encourage the development of a bicycle network that connects to regional destinations such as parks, trails, educational institutions, employment centers, transit, park and ride lots, and tourist destinations.
- ▶ **Policy CTM-3.4: Interjurisdictional Bicycle Network Connectivity.** The County shall promote bicycle network connectivity between Ventura County communities as well as Santa Barbara and Los Angeles Counties.
- ▶ **Policy CTM-3.5: Bicycle Routes in Rural Areas.** The County shall plan for bicycle network connectivity in rural, agricultural, and open space areas in a way that supports and complements business and agricultural activities in those areas.
- ▶ **Policy CTM-3.6: Coordination with Bicycle Wayfinding Plan.** The County shall support the Complete Streets effort by when feasible, constructing bicycle lanes on County maintained roads listed in the Ventura County Transportation Commission Bicycle Wayfinding Plan.
- ▶ **Policy CTM-3.7: Bicycle Trail along Santa Paula Branch Line.** The County shall encourage the construction of a bicycle trail along the Santa Paula Branch Line Railroad in the unincorporated area between the cities of Ventura and Santa Paula.
- ▶ **Policy CTM-3.8: Bicycle Network Routes and Wayfinding.** The County shall use clear and consistent message and placement for on- and off-street regional bikeways and to regional destinations.
- ▶ **Policy CTM-3.9: Funding for Bicycle Network and Wayfinding Planning and Improvements.** The County shall actively pursue outside funding opportunities for bicycle network improvements.
- ▶ **Policy CTM-3.10: Bicycle Storage Facilities.** The County shall require adequate bicycle storage facilities (e.g., bicycle racks, lockers) for discretionary development as determined by allowable land uses at a given site.
- ▶ **Policy CTM-4.1: Reduce Vehicle Miles Traveled (VMT).** The County shall work with Caltrans and Ventura County Transportation Commission (VCTC) to reduce VMT by:
 - facilitating the efficient use of existing transportation facilities;
 - striving to provide viable modal choices that make driving alone an option rather than a necessity;
 - supporting variable work schedules to reduce peak period VMT; and
 - providing more direct routes for pedestrians and bicyclists.
- ▶ **Policy CTM-4.2: Alternative Transportation.** The County shall encourage bicycling, walking, public transportation, and other forms of alternative transportation to reduce Vehicle Miles Traveled (VMT), traffic congestion, and greenhouse gas emissions.
- ▶ **Policy CTM-4.3: Vehicle Occupancy.** The County shall work with a broad range of agencies (e.g., Caltrans, Ventura County Transportation Commission (VCTC), Amtrak, Ventura County Air Pollution Control District, public transportation providers and shared mobility vendors) to encourage and support programs that increase vehicle occupancy including the provision of traveler information, shuttles, and preferential parking for carpools/vanpools.

- ▶ **Policy CTM-4.4: Park-and-Ride Facilities.** The County shall coordinate with Caltrans and Ventura County Transportation Commission (VCTC) to identify future park-and-ride lots within the unincorporated areas of Ventura County to facilitate more carpooling, vanpooling, and public transportation use.
- ▶ **Policy CTM-6.1: Routine Use of Alternative Transportation Options.** The County shall support the integration of emerging technologies that increase the routine use of alternative transportation options to decrease single-passenger automobile travel.
- ▶ **Policy CTM-6.4: Facilities for Emerging Technologies.** The County shall support the development of alternative fueling stations (e.g., electric and hydrogen) and vehicle-to-infrastructure (V2I) technology for emerging technologies.
- ▶ **Policy CTM-6.5: Electric Vehicle Charging Stations.** The County shall support the installation of electric vehicle charging stations, where feasible, at County facilities, parking lots, park-and-ride lots, truck stops, and new development.
- ▶ **Policy CTM-6.6: Neighborhood Electric Vehicles.** The County shall encourage developments and street systems that support the use of properly licensed Neighborhood Electric Vehicles where appropriate.
- ▶ **Policy CTM-6.7: Shared Mobility Operations.** The County shall encourage and support car share operators at multimodal facilities including public transportation hubs, passenger rail stations, and park-and-ride lots.
- ▶ **Policy CTM-6.8: Micro-Mobility Operations.** The County shall evaluate the feasibility and work to establish requirements for shared micro-mobility (e.g., bike sharing) vendors within unincorporated areas.
- ▶ **Policy CTM-6.9: Mobility-as-a-Service Enterprises – Vehicle Operations.** The County shall encourage Mobility-as-a-Service providers to park between service calls versus driving within unincorporated communities.
- ▶ **Policy CTM-6.10: Mobility-as-a-Service Enterprises – Support Public Transportation.** The County shall encourage Mobility-as-a-Service providers to coordinate with public transportation providers that serve unincorporated areas to increase the attractiveness of public transportation through the provision of free or subsidized public transportation patron first and last mile connections within unincorporated communities.

Implementation Programs

- ▶ **Implementation Program A: Traffic Impact Mitigation Fee Program.** The County shall update its Traffic Impact Mitigation Fee program and perform a comprehensive update to the program every five (5) years pursuant to Government Code section 66000 et seq.
- ▶ **Implementation Program B: Initial Study Assessment Guidelines.** The County shall update and adopt its' Initial Study Assessment Guidelines to address Vehicle Miles Traveled (VMT) and safety metrics pursuant to CEQA Guidelines Section 15064.3.
- ▶ **Implementation Program C: Vehicle Miles Traveled (VMT) Reduction Program.** To support climate change related goals and CEQA related VMT policies per SB 743 (2013), the County shall develop a Vehicle Miles Traveled Reduction Program.
- ▶ **Implementation Program H: Complete Streets Guidelines.** The County shall prepare and adopt Complete Streets Design Guidelines/standards to be used when constructing new roadways or improving existing roadways where Complete Streets would be

appropriate/feasible. Complete Streets Design Guidelines/standards should be consistent with the pedestrian and bicycle design guidelines and design standards established by Caltrans and supporting state/federal guidelines when designing bicycle/pedestrian facilities. These include the California Manual on Uniform Traffic Control Devices (CAMUTCD), Highway Design Manual, Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO).

The County shall improve pedestrian safety at intersections and mid-block locations in developed communities by providing pedestrian crossing treatments where appropriate.

- ▶ **Implementation Program I: County Road Standards Update.** The County shall update Road Standards to include the Complete Street Design Guidelines/Standards.

Public Facilities, Services and Infrastructure

- ▶ **Policy PFS-1.10: Efficient County Operation and Maintenance.** The County shall operate and maintain County facilities in an efficient manner that meets community needs while conserving financial and natural resources.
- ▶ **Policy PFS-2.1: Sustainable Plans and Operations.** The County shall encourage energy efficiency, greenhouse gas reduction features, and resiliency planning into County facility and service plans and operations.
- ▶ **Policy PFS-2.2: Sustainable Community Facility Design.** The County shall encourage the incorporation of sustainable design features in community facilities to reduce energy demand and environmental impacts, such as reflective roofing, permeable pavement, and incorporation of shade trees.
- ▶ **Policy PFS-2.3: Energy Efficient Facility Construction, Purchases, Leases, Retrofits, and Expansions.** The County shall prioritize energy efficiency and water conservation as key design features when constructing, purchasing, leasing, retrofitting or expanding County facilities.
- ▶ **Policy PFS-2.5: County Employee Trip Reduction.** The County shall encourage its employees to reduce the number and distance of single-occupancy vehicle work trips.
- ▶ **Policy PFS-2.6: County Alternative Fuel Vehicle Purchases.** The County shall review market-available technologies for alternative fuel vehicles and prioritize purchase of vehicles to reduce greenhouse gas emissions where economically feasible.
- ▶ **Policy PFS-2.8: Electric Vehicle Charging Station Infrastructure.** The County shall include electrical vehicle charging station infrastructure in new County-initiated facility construction to the extent feasible. The County shall also look for opportunities to install EV charging stations as part of any major renovation, retrofit or expansion of County facilities.
- ▶ **Policy PFS-4.6: Reclaimed Water.** The County shall encourage public wastewater system operators to upgrade existing wastewater treatment systems to reclaim water suitable for reuse for landscaping, irrigation, and groundwater recharge.
- ▶ **Policy PFS-5.5: Agricultural Waste Reuse.** The County shall support the beneficial reuse of agricultural wastes for activities such as composting and energy generation.
- ▶ **Policy PFS-5.6: Value-Added Alternatives to Waste Disposal.** The County shall promote value-added alternatives to solid waste management, such as compost, energy, biochar, and wood products to avoid open burning of agricultural biomass wastes.

- ▶ **Policy PFS-7.6: Smart Grid Development.** The County shall work with utility providers to implement smart grid technologies as part of new developments and infrastructure projects.

Implementation Programs

- ▶ **Implementation Program A: Infrastructure Improvements and Funding.** The County shall prepare, adopt, and periodically update capital improvement programs for all County-owned and operated facilities and services to maintain adequate levels of service and consistency with the General Plan.

Conservation and Open Space Element

- ▶ **Policy COS-3.2: Tree Canopy.** The County shall encourage the planting of trees and the protection of existing urban forests and native woodlands, savannahs, and tree canopy throughout the county, including along State or County designated scenic roadways and in residential and commercial zones throughout the county but especially those located within designated disadvantaged communities.
- ▶ **Policy COS-3.3: Utility Undergrounding Priority.** The County shall give overhead utility undergrounding within high fire hazard areas and Scenic Resource Areas first priority when allocating County Utility Undergrounding Funds.
- ▶ **Policy COS-7.4: Electrically-Powered Equipment for Oil and Gas Exploration and Production.** The County shall require discretionary development for oil and gas exploration and production to use electrically-powered equipment from 100 percent renewable sources and cogeneration, where feasible, to reduce air pollution and greenhouse gas emissions from internal combustion engines and equipment.
- ▶ **Policy COS-7.7: Conveyance for Oil and Produced Water.** 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-8.1: Reduce Reliance on Fossil Fuels.** The County shall promote the development and use of renewable energy resources (e.g., solar, thermal, wind, tidal, bioenergy, hydroelectricity) to reduce dependency on petroleum-based energy sources.
- ▶ **Policy COS-8.2: Incentives for Energy Efficiency.** The County shall encourage the State and energy utility companies to provide programs, rebates, and incentives for energy efficiency installation and retrofit projects.
- ▶ **Policy COS-8.3: Coordinate Climate Action Plan with Cities and Organizations.** The County shall facilitate the coordination of its Climate Action Plan implementation and maintenance with the cities in the county, the Air Pollution Control District, and other organizations to promote countywide collaboration on addressing climate change.
- ▶ **Policy COS-8.4: Clean Power Alliance.** The County, as a signatory to a legal entity created under a Joint Powers Authority with neighboring communities, shall continue to serve as an active member of the Clean Power Alliance or similar organization providing local customer access to electricity generated from low carbon renewable energy sources in excess of State requirements.
- ▶ **Policy COS-8.5: Decarbonize Communitywide Electricity Supplies.** The County shall work with utility providers to offer residents options to purchase and use renewable energy resources.

- ▶ **Policy COS-8.6: Zero Net Energy and Zero Net Carbon Buildings.** The County shall support the transition to zero net energy and zero net carbon buildings, including electrification of new buildings.
- ▶ **Policy COS-8.7: Sustainable Building Practices.** The County shall promote sustainable building practices that incorporate a “whole systems” approach for design and construction that consumes less energy, water, and other non-renewable resources, such as by facilitating passive ventilation and effective use of daylight.
- ▶ **Policy COS-8.8: Renewable Energy Features in Discretionary Development.** The County shall encourage the integration of features that support the generation, transmission, efficient use, and storage of renewable energy sources in discretionary development.
- ▶ **Policy COS-8.9: Urban Tree Canopy Improvements for Energy Conservation.** The County shall encourage discretionary development to include the planting of shade trees on each property and within parking areas to reduce radiation heat production.
- ▶ **Policy COS-8.10: Battery Energy Storage Systems.** The County shall encourage battery energy storage systems as an option for optimizing the management of electricity generated by renewable resources.
- ▶ **Policy COS-8.11: Improve Energy Conservation Awareness.** The County shall encourage community members to conserve energy and reduce greenhouse gas emissions and increase awareness about energy efficiency and climate change and adaptation, to conduct targeted outreach to homeowners and contractors to encourage installation of electric appliances upon routine replacement of natural gas appliances and heaters and provide information regarding financial incentives.
- ▶ **Policy COS-10.4: Greenhouse Gas Reductions in Existing and New Development.** The County shall reduce GHG emissions in both existing and new development through a combination of measures included in the GHG Strategy, which includes new and modified regulations, financing and incentive-based programs, community outreach and education programs, partnerships with local or regional agencies, and other related actions.

Implementation Programs

- ▶ **Implementation Program C: Update Tree Protection Ordinance.** The County shall update existing Tree Protection Regulations in the Non-Coastal Zoning Ordinance to further enhance conservation of our urban forests and the preservation of the County’s oak woodland resources. Updates shall include incorporation of Board-adopted recommendations from the Ventura County Oak Woodlands Management Plan (2007), which include tree replacement offsets for ministerial development projects that remove protected trees, revisiting mitigation ratios for tree removal and oak woodland impacts for discretionary development projects. The update shall also evaluate existing protections for invasive, non-native trees and consider the degree to which they provide habitat for a species during critical life stages (e.g., colonial roost sites, breeding sites, etc.). In addition, the evaluation shall also include anticipated effects of climate change on the urban forest environment.
- ▶ **Implementation Program H: County Tree Planting Program.** The County shall plant at least one thousand trees annually.

- ▶ **Implementation Program N: Sustainable Building, Siting, and Landscaping Practice Guidelines.** The County shall prepare sustainable building, siting, and landscaping practice guidelines that promote a whole systems approach to building designs and construction techniques that reduce consumption of non-renewable resources such as oil, gas and water and promote renewable energy use.
- ▶ **Implementation Program O: Assessment of Land Near Electrical Transmission and Distribution Lines.** The County shall conduct a study and prepare a publicly available assessment of suitable undeveloped lands near electrical transmission and distribution lines that serve as priority areas for the development of utility-scale solar energy generation and storage projects. If suitable locations are identified, the County shall establish a new zone, called a Renewable Energy Priority Zone, for these sites in the County's Coastal and Non-Coastal Zoning Ordinances.
- ▶ **Implementation Program P: Study to Demonstrate Energy and Greenhouse Gas (GHG) Savings.** The County shall conduct a study that demonstrates the energy and greenhouse gas (GHG) savings of the options identified in Implementation Program COS-L using modeled building prototypes. To satisfy state regulatory requirements for Energy Reach Code adoption, the study shall also demonstrate long-term cost savings of the options through a life-cycle cost analysis that considers the initial costs of efficiency improvements offset by utility bill cost savings and other relevant factors.
- ▶ **Implementation Program Q: Incentives for Development in the Renewable Energy Priority Zone.** To incentivize the development of the Renewable Energy Priority Zone sites, the County shall consider waiving permit fees and providing a reduction on the annual property tax assessment for the portion of land used for renewable energy generation or storage.
- ▶ **Implementation Program R: Performance-Based Building Code for Green Building.** The County shall update the Building Code to establish performance-based standards that incentivize green building techniques.
- ▶ **Implementation Program S: Building Code Update.** The County shall update the Building Code to include a mandatory Energy Reach Code.
- ▶ **Implementation Program T: Energy Consumption Performance.** The County shall continue to review its energy consumption performance and implement programs designed to increase energy efficiency in County-owned buildings, including, but not limited to:
 - reduced operating hours for heating, ventilating and lighting systems,
 - installation of weather stripping on all openable doors and windows,
 - development of energy audit and energy management programs,
 - implementation of operation and maintenance programs which contribute to energy conservation,
 - develop energy audits and energy management programs for all County-owned facilities,
 - develop a plan to re-invest utility company rebates and utility savings into a long-range funding program for on-going conservation projects,
 - implement operational and maintenance programs which contribute to energy conservation,

- investigate and implement new energy technologies such as solar and fuel cells,
 - install energy management systems in all County-owned facilities to control air conditioning and lighting systems where beneficial,
 - install ceiling, wall, and roof insulation whenever feasible,
 - install plumbing flow restrictors in toilets, lavatories and showers, and
 - provide energy conservation training and literature to all County agencies
- **Implementation Program U: Solar Canopies in Non-Residential Projects.** The County shall amend the County's Coastal and Non-Coastal Zoning Ordinances to require parking lots for new non-residential construction projects, with floor area of greater than 50,000 square feet, to include solar canopies.
- **Implementation Program W: Energy Efficiency and Conservation Program.** The County shall develop a behavior change program for energy efficiency and conservation. This program would provide energy literacy training for low-income customers on buying energy-efficient products or using energy more efficiently; develop and offer digital applications offering real-time energy use information to residents and businesses; offer anonymized data on community energy use for residents to compare performance; and provide rewards or rebates for improved energy conservation.

Hazards and Safety Element

- **Policy HAZ-10.5: Air Pollution Impact Mitigation Measures for Discretionary Development.** The County shall work with applicants for discretionary development projects to incorporate bike facilities, solar water heating, solar space heating, incorporation of electric appliances and equipment, the use of zero and/or near zero emission vehicles and other measures to reduce air pollution impacts and reduce greenhouse gas (GHG) emissions.
- **Policy HAZ-10.6: Transportation Control Measures Programs.** The County shall continue to work with the Ventura County Air Pollution Control District (APCD) and Ventura County Transportation Commission (VCTC) to develop and implement Transportation Control Measures (TCM) programs consistent with the APCD's Air Quality Management Program (AQMP) to facilitate public transit and alternative transportation modes within the county.
- **Policy HAZ-10.7: Fuel Efficient County Vehicles.** When purchasing new County vehicles, the County shall give strong preference to fuel efficient vehicles, including the use of zero emission vehicles when feasible.
- **Policy HAZ-10.8: Alternative Transportation Modes.** The County shall promote alternative modes of transportation that reduce single-occupancy vehicle (SOV) travel and enhance "last-mile" transportation options to improve air quality.
- **Policy HAZ-11.6: Accessible Cooling Centers.** The County shall expand partnerships with local governments, non-government organizations, churches, and businesses to provide additional cooling centers, particularly in designated disadvantaged communities.
- **Policy HAZ-11.7: Green Building Design Features.** The County shall encourage development to include retrofits to improve building performance and market value through strategic building design features, including insulation and strategic orientation of buildings to reduce energy usage, solar-reflective white roofs, solar panels, green roofs (vegetation on roofs), and battery storage for energy.

- ▶ **Policy HAZ-11.8: Undergrounding Utilities.** The County shall work with utility providers to underground overhead power lines (both existing and as part of discretionary development) to increase the resilience of the energy grid and reduce wildfire potential, especially in Existing Communities.
- ▶ **Policy HAZ-11.9: Urban Greening.** The County shall promote the use of urban greening techniques, such as cool pavement technology, parking lot shading, landscaping, and other methods to offset climate change impacts and reduce greenhouse gas emissions for discretionary development and County-initiated projects.
- ▶ **Policy HAZ-11.10: Solar Photovoltaic Carports.** The County shall promote the use of solar photovoltaic carports for discretionary development and County initiated projects.

Agriculture Element

- ▶ **Policy AG-4.3: Technological Innovation.** The County shall encourage the use of technology that supports agricultural production, while enhancing environmental sustainability and natural resource conservation.
- ▶ **Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment.** The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment, when feasible.
- ▶ **Policy AG-5.3: Electric- or Renewable- Powered Irrigation Pumps.** The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar-power, and encourage electric utilities to eliminate or reduce stand-by charges.
- ▶ **Policy AG-5.4: Alternative Irrigation Techniques.** The County shall encourage farmers to continue and enhance the water-saving irrigation techniques designed to reduce water consumption.

Water Resources Element

- ▶ **Policy WR-3.1: Non-Potable Water Use.** The County shall encourage the use of non-potable water, such as tertiary treated wastewater and household graywater, for industrial, agricultural, environmental, and landscaping needs consistent with appropriate regulations.
- ▶ **Policy WR-3.2: Water Use Efficiency for Discretionary Development.** The County shall require the use of water conservation techniques for discretionary development, as appropriate. Such techniques include low-flow plumbing fixtures in new construction that meet or exceed the state Plumbing Code, use of graywater or reclaimed water for landscaping, retention of stormwater runoff for direct use and/or groundwater recharge, and landscape water efficiency standards that meet or exceed the standards in the California Model Water Efficiency Landscape Ordinance.
- ▶ **Policy WR-3.3: Low-Impact Development.** The County shall require discretionary development to incorporate low impact development design features and best management practices, including integration of stormwater capture facilities, consistent with County's Stormwater Permit.
- ▶ **Policy WR-3.4: Reduce Potable Water Use.** The County shall strive for efficient use of potable water in County buildings and facilities through conservation measures, and technological advancements.

- ▶ **Policy WR-6.1: Water for Agricultural Uses.** The County should support the appropriate agencies in their efforts to effectively manage and enhance water quantity and quality to ensure long-term, adequate availability of high quality and economically viable water for agricultural uses, consistent with water use efficiency programs.
- ▶ **Policy WR-6.2: Agricultural Water Efficiency.** The County should support programs designed to increase agricultural water use efficiency and secure long-term water supplies for agriculture.
- ▶ **Policy WR-6.3: Reclaimed Water Use.** The County should encourage the use of reclaimed irrigation water and treated urban wastewater for agricultural irrigation in accordance with federal and state requirements in order to conserve untreated groundwater and potable water supplies.

Economic Vitality Element

- ▶ **Policy EV-4.4: Renewable Energy Facilities.** The County shall identify appropriate locations to allow for development of renewable energy generation and storage facilities and encourage the development of innovative approaches to renewable energy deployment, including solar power, wind power, wave energy, distributed power systems and micro-grids, and other appropriate renewable sources and storage and distribution systems.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.6-1: 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

Appendix F of the State CEQA Guidelines requires the consideration of the energy implications of a project. CEQA requires mitigation measures to reduce “wasteful, inefficient, and unnecessary” energy usage (PRC Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use of energy. However, the 2040 General Plan is evaluated for energy performance relative to baseline conditions, so this section evaluates the energy conservation and renewable energy features that have been incorporated into the 2040 General Plan for construction and operation in future development.

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

Energy Consumption in Construction

Future development accommodated by the 2040 General Plan would involve construction activities, including the construction of new buildings and related infrastructure. Energy would be required to operate and maintain construction equipment and to produce and transport construction materials associated with the construction of the development of the 2040 General Plan. The one-time energy expenditure required to construct buildings and other infrastructure associated with future development would be nonrecoverable. Most construction-related energy consumption would result from the operation of construction equipment and vehicle trips associated with commutes by construction workers and haul trucks supplying and removing materials. Policy COS-8.7 and Implementation Program COS-U also state that the County should encourage sustainable building practices based on a whole systems approach, which entails a consideration of green building features not just within the building's design, but also within the processes used to bring that building fruition (e.g., energy use from the equipment and products used during construction). Conditions of approval for a project based on this principle could require builders to include measures that promote carpooling for workers, use of alternative fuels, and the use of high-efficiency internal combustion engines or electric-powered equipment. Also because project applicants must pay for fuel during construction, there is an inherent incentive for project applicants to ensure that their equipment operates efficiently and to limit non-productive use to minimize construction energy costs. For these reasons, construction activities associated with future development under the 2040 General Plan would not result in the wasteful, inefficient, or unnecessary consumption of energy.

Energy Consumption in Future Development

This subsection describes the energy use associated with implementation of the 2040 General Plan. The future operation of residential, commercial, educational, industrial and other buildings, structures, and activities in the plan area under the 2040 General Plan would include the use of electricity and natural gas for many different applications, such as lighting, space and water heating, appliances, and equipment use. Indirect energy use would include the pumping, treatment, and conveyance of water for buildings, landscaping, and many other end uses. Future development under the 2040 General Plan would increase total electricity and natural gas consumption in the county relative to existing conditions though the development

and occupancy of new commercial and residential buildings, as well as other land uses, structures, and activities that consume natural gas and electricity. Table 4.6-2 shows annual energy consumption from buildings countywide under baseline conditions (2015), and at the 2040 buildout.

Table 4.6-2 2040 General Plan Estimated Building Electricity and Natural Gas Use

	Electricity (kWh/year)		Natural Gas (kBtu/year)	
	2015	2040	2015	2040
Total Energy Consumption	588,724,066	628,775,129	26,212,405	27,875,378
Per Capita Consumption	6,023	6,174	268	274

A 6.8 percent increase in electricity and 6.3 percent increase in natural gas consumption are forecast under the 2040 General Plan. This estimate is based on forecasted employment and housing growth that would be accommodated by the 2040 General Plan and does not reflect quantified reductions from energy saving measures contained in the 2040 General Plan. These energy conservation features cannot be accurately quantified at this time because the policies and implementation programs allow flexibility for design and implementation. Policies and Programs addressing energy in future development are targeted toward minimizing the consumption of electricity and natural gas in new construction, by promoting energy efficiency design techniques that minimize water heating, air conditioning, and lighting energy needs. Examples of policies intended to promote energy efficiency include Policy LU-16.9 Building Orientation and Landscaping, Policy PFS-2.3 Energy Efficient Facility Construction, and Policy COS-8.7 Sustainable Building Practices. These policies work to reduce energy consumption while other policies included in the plan are intended to supply the remaining energy needs with renewable sources of energy through solar panels. Policy COS-8.8 Renewable Energy Features in Discretionary Development and Policy HAZ-11.10 Solar Photovoltaic Carports will result in the deployment of additional distributed energy generation. Policy COS-8.10 Battery Energy Storage Systems and Policy PFS-7.6 Smart Grid Development will be implemented as well to ensure that the electricity produced from renewable energy sources is optimized for the time of building energy use, so as not to burden the region's electric grid with excess generation and peak demands.

Opportunities for promoting development of all-electric buildings (specifying the use of appliances that do not require natural gas) have also been included as a measure through Policy 8.5, Decarbonize Energy Supplies, and Policy 8.6, Zero Carbon Buildings. All-electric buildings would not require new piping for natural gas. The 2040 General Plan also encourages the County to continue working with the Clean Power Alliance, SCE, SoCalGas, and other partners to supply electricity and gas produced from renewable sources. Policy COS-8.4 encourages the County to maintain its participation in the Clean Power Alliance, which currently provides 100 percent carbon-free electricity to 83 percent of eligible utility customers in the unincorporated county, as shown in Table 4.6-1. Increasing participation in this program and expanding local generation through Policies COS-8.1, COS-8.8, EV-4.4, COS-Q, COS-U support the goals of VCREA to advance the use of clean and renewable local resources, as described in the regulatory settings. The supply of natural gas in new buildings can also be transitioned to renewable sources through Policy PFS-5.6 and Policy COS-8.1, which allow organic wastes to be generated from agricultural production, and vegetation treatment to be converted into biomethane, which can serve as an alternative to fossil fuels.

Policies and programs included in the 2040 General Plan would also reduce gas and diesel fuels consumed in the transportation sector by working to reduce VMT and providing EV

charging infrastructure to support increased levels of EV use. VMT reduction would be achieved by providing transit alternatives, through innovative shared transportation model described in policies CTM-6.6, CTM-6.7, and CTM-6.9, publicly available scooters and bicycles described as “micro-mobility” operations in Policy CTM 6.8, and expansion of bicycle and pedestrian networks as described policies CTM-3.1, 3.3, 3.4, 3.5, 3.7 and 3.8. These policies support the county’s overall program for VMT reduction sought by Implementation Program CTM-C. Additionally, future development would be subject to VMT thresholds consistent with SB 743, which would be included in the ISAG under Implementation Program CTM-B. These thresholds would have the effect of requiring projects to include design features or other measures that result in VMT reduction. The installation of electric vehicle charging equipment as promoted in Policies CTM-6.5 and PFS-2.8 would support a transition to the broader adoption of zero emission vehicles, which would reduce use of gasoline- and diesel-powered vehicles.

Under the 2040 General Plan the county’s electricity and natural gas use would increase; however, 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 implement measures to substitute natural gas with biomethane produced from organic waste; electric vehicle chargers will be installed in public facilities to further transition vehicle ownership to Zero Emissions Vehicles; and a robust set of VMT reduction measures will be put into place to encourage alternative modes of transportation that reduce overall motor vehicle use and associated gas and diesel consumption. Operational activities associated with future development under the 2040 General Plan would not result in the wasteful, inefficient, or unnecessary consumption of energy.

Additionally, implementation of the 2040 General Plan would not conflict with or obstruct State plans for renewable energy or energy efficiency, which are described in the 2018 IEPR. The State’s planning for renewable energy is expressed through laws and regulations that mandate the deployment of renewable and clean energy generation at the building and utility scales. The policies and programs of 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 of renewable energy deployment in the county. For example, the 2019 Building Energy Efficiency Standards which go into effect in January 2020 will require on-site solar generation for all new residential construction. Policy HAZ-11.7 expands the scope of solar installations to include existing residential and commercial buildings and Implementation Program COS-U will require the installation of solar on the parking lot of large commercial buildings. Policy COS-8.10 aims to pair renewable energy generation with energy storage systems, to increase the benefits associated with renewable generation by storing renewable energy for later use. According to the 2018 IEPR, “energy storage is an important tool to help integrate increasing amounts of solar- and wind-powered electricity into the grid. For example, it can be used to store renewable generation when production exceeds demand and then reinject the energy into the system when supply is short. Energy storage can also be used in place of natural gas peaking plants in high electricity demand hour and can provide several services to the electric grid, including frequency regulation, voltage support, resource adequacy, time-of-use bill management, and demand charge reduction. Energy storage is helping alleviate energy reliability issues in Southern California” (CEC 2018:111).

Under the State's RPS electric utilities are required to produce 33 percent of electricity from renewable energy sources by the end of 2020 and increasing to 60 percent by the end of 2030. Under the County's participation in CPA it is currently exceeding this requirement, with 83 percent of residential customers receiving electricity from 100 percent renewable energy sources. Under the 2040 General Plan the County's capacity to produce renewable energy will continue to expand. Policy COS-8.1 promotes the development and use of renewable energy resources (e.g., solar, thermal, wind, tidal, bioenergy, hydroelectricity) as alternatives to petroleum-based energy sources. EV-4.4 directs the County to identify appropriate locations to allow for development of renewable energy generation and storage facilities and encourage the development of innovative approaches to renewable energy deployment, including solar power, wind power, wave energy, distributed power systems and microgrids, and other appropriate renewable sources and storage and distribution systems. Under Implementation Program COS-M, the County will identify Renewable Energy Priority Zones comprised of suitable undeveloped lands near electrical transmission and distribution lines that serve as priority areas for the development of utility-scale solar energy generation and storage projects.

Chapters 2 and 3 of the 2018 IEPR provide recommendations to State agencies on energy efficiency and renewable energy generation, respectively, which include a continuation of doubling energy savings through utility programs as mandated under SB 350 and continuing the expansion of electricity generation from renewable and zero carbon sources as mandated under SB 100. Regarding local plans for renewable energy or energy efficiency, the 2040 General Plan would not conflict with local goals set by VCREA, because the plan would increase energy efficiency and advance the use of clean, efficient and renewable local resources through the deployment of additional renewable energy generation and storage systems under Policies COS-8.1 and HAZ-11.7, and Programs COS-M and COS-U. The 2040 General Plan would also introduce energy efficiency strategies for existing buildings, and introduce performance standards for energy efficiency in new construction in excess of the mandatory requirements of the California Building Energy Efficiency Standards. The 2040 General Plan would not conflict with or obstruct State and local plans for energy efficiency or renewable energy; rather it would support the goals of these plans.

The preceding analysis describes several 2040 General Plan policies and programs that would support energy conservation and efficiency during construction and operation activities under implementation of the 2040 General Plan. Per-capita energy consumption would be decreased by the State's requirements for more energy efficient buildings and policies and programs that encourage buildings with energy performance that is more efficient than State standards. The 2040 General Plan encourages future sustainable building practices that would promote efficient energy consumption associated with construction activities. Reliance on fossil fuels would be decreased by supporting the electrification of vehicles by deploying charging infrastructure, promoting building electrification, and encouraging alternative modes of transportation. The deployment of additional renewable energy generation sources at the distributed and utility-scales would increase reliance on renewable sources of electricity. As a result, the 2040 General Plan would not result in the wasteful, inefficient, or unnecessary consumption of energy and would not conflict with or obstruct State and local plans for energy efficiency or renewable energy; it would support the goals set forth in these plans. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact

4.7 GEOLOGIC HAZARDS

This section evaluates the potential effects of geologic hazards in regard to implementation of the 2040 General Plan including the location of physical development within a State of California–designated Alquist-Priolo Special Fault Study Zone, a County of Ventura–designated Fault Hazard Area, a Seismic Hazards Zone that exposes people or structures to liquefaction hazards, landslide or mudflow hazard areas, expansive soils hazard zones, or where soils with an expansion index greater than 20 are present, and exposing people and structures to risk of loss, injury, or death in these areas. For a discussion of impacts related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems, refer to Section 4.10, “Hydrology and Water Quality.” For a discussion of impacts related to landslides as a result of post-fire slope instability or drainage changes, refer to Section 4.9, “Hazards, Hazardous Materials, and Wildfire.” For discussion of impacts on paleontological resources, refer to Section 4.5, “Cultural, Tribal Cultural, and Paleontological Resources.”

As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts. No comments regarding geologic hazards were received in response to the notice of preparation (NOP). The NOP and comments on the NOP are included in Appendix A.

4.7.1 Background Report Setting Updates

REGULATORY SETTING

Chapter 11, “Hazards and Safety,” of the Background Report (Appendix B) accurately describes the regulatory setting for the purpose of this evaluation. Refer to Section 11.1, “Geologic and Seismic Hazards.” There is no additional information necessary to understand the potential geologic hazard impacts of the 2040 General Plan.

ENVIRONMENTAL SETTING

In addition to the information provided in Section 11.1, “Geologic and Seismic Hazards,” of the Background Report, the following information is relevant to understanding the potential geologic hazards impacts of the 2040 General Plan.

4.7.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

This program-level analysis evaluates potential geologic hazards impacts based on the location and type of future development that could be accommodated under the land use designations and policies of the 2040 General Plan in relation to the location of existing

geologic hazards areas, including areas prone to fault rupture, seismic ground shaking or seismic-related ground failure such as liquefaction or lateral spreading, landslides, subsidence, soil erosion or loss of topsoil, expansive soil. The locations of existing geologic hazards areas are based on existing conditions described in the Background Report (Section 11.1 of Appendix B). The analysis in this section is also based on review of existing plans, use of online mapping tools, review of geographic information system (GIS) and other maps, and review of regulatory documents and requirements. Sources reviewed include U.S. Geological Survey, California Geological Survey (CGS), and various Area Plans.

In response to 2019 revisions to the State CEQA Guidelines (Public Resources Code Section 15126.2) and the 2015 California Supreme Court case, *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, impacts from exposure of a project to environmental hazards are not considered significant effects unless a project exacerbated the risks from such hazards. However, lead agencies retain the authority, separate and apart from CEQA, to include a review of potential impacts of the environment on a project when a project is undertaken by a lead agency, such as the 2040 General Plan. The 2040 General Plan is a comprehensive document that broadly establishes policy, not only related to the environment, but also related to public health and safety. Therefore, the analysis of geologic hazards in this section considers whether the 2040 General Plan could cause or exacerbate geologic hazards impacts and whether the 2040 General Plan could result in impacts from exposure to geologic hazards. The discussion of potential impacts from exposure to geologic hazards is provided for information purposes only and is neither required by CEQA nor subject to its requirements.

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on Ventura County’s adopted ISAG, which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project’s impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, Appendix G question VII(b) was added as a threshold because impacts on soil erosion and the loss of topsoil are not addressed in ISAG. For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant geologic hazards impact if it would:

- ▶ Result in development within a State of California–designated Earthquake Fault Zone or a County–designated Fault Hazard Area that exposes people or structures to fault rupture hazards or directly or indirectly cause fault rupture.
- ▶ Result in development that conflicts with applicable requirements of the Ventura County Building Code and thus have potential to expose people or other structures to potential significant adverse effects, including the risk of loss, injury, or death involving ground-shaking hazards.

- ▶ Result in development within a State of California Seismic Hazards Zone that exposes people or structures to liquefaction hazards or directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death involving liquefaction.
- ▶ Result in development that exposes people or structures to landslide or debris flow hazards as a result of mapped landslides, potential earthquake-induced landslide zones, and geomorphology of hillside terrain or directly or indirectly cause landslides.
- ▶ Result in development that exposes people or structures to the risk of loss, injury, or death involving soil expansion or directly or indirectly cause soil expansion if development is located within an expansive soils hazard zone.
- ▶ Result in development that exposes people or structures to the risk of loss, injury, or death involving subsidence or directly or indirectly cause subsidence if development is located within a subsidence hazard zone.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to geologic hazards and, specifically, the thresholds of significance identified above, include the following:

- ▶ **Policy HAZ-4.1: Discretionary Development in Earthquake Fault-Rupture Hazard Areas.** The County shall prohibit habitable discretionary development in Earthquake Fault-Rupture Hazard Zones unless a geologic investigation is performed and appropriate and sufficient safeguards, based on this investigation, are incorporated into the project design. (RDR) *[Source: Existing Lake Sherwood/Hidden Valley Area Plan Policy 3.1.2.2, Oak Park Area Plan Policy 2.1.2.2, Ojai Valley Area Plan Policy 2.1.2.2, and Piru Area Plan Policy 2.1.2.2, modified]*
- ▶ **Policy HAZ-4.2: Linear Project Intersection with Active Faults.** The County shall require that linear projects, including roads, streets, highways, utility conduits, water transmission facilities, and oil and gas pipelines, avoid intersecting active faults to the extent possible. When such locations are unavoidable, the project design shall include measures to minimize the effects of any fault movement. (RDR) *[Source: Existing GPP Policy 2.2.2.5, modified]*
- ▶ **Policy HAZ-4.3: Structural Design.** The County shall require that all structures designed for human occupancy incorporate engineering measures to reduce the risk of and mitigate against collapse from ground shaking. (RDR) *[Source: Existing GPP Policy 2.3.2.1, modified]*
- ▶ **Policy HAZ-4.6: Vegetative Resource Protection.** The County shall require discretionary development to minimize the removal of vegetation to protect against soil erosion, debris flows, and landslides. (SO) *[Source: New Policy]*
- ▶ **Policy HAZ-4.8: Seismic Hazards.** The County shall not allow development of habitable structures or hazardous materials storage facilities within areas prone to the effects of strong ground shaking, such as liquefaction, landslides, or other ground failures, unless a geotechnical engineering investigation is performed and appropriate and sufficient safeguards, based on this investigation, are incorporated into the project design. (RDR) *[Source: Existing GPP Policy 2.4.2.1]*

- ▶ **Policy HAZ-4.9: Slope Development.** The County shall require geotechnical reports that demonstrate adequate slope stability and construction methods for building and road construction on slopes greater than 50 percent pursuant to the California Building Code Appendix J Section 108.6. (RDR) *[Source: New Policy]*
- ▶ **Policy HAZ-4.10: Development in Landslide/Debris Flow Hazard Areas.** The County shall not allow development in mapped landslide/debris flow hazard areas unless a geologic and geotechnical engineering investigation is performed and appropriate and sufficient safeguards, based on this investigation, are incorporated into the project design. (RDR) *[Source: Existing GPP Policy 2.7.2., modified]*
- ▶ **Policy HAZ-4.11: Alteration of Land in Landslide/Debris Flow Hazard Areas.** The County shall not allow alteration of land in landslide/debris flow hazard areas, including concentration of water through drainage, irrigation or septic systems, removal of vegetative cover, and undercutting of the bases of slopes or other grading activity unless demonstrated by geologic, geotechnical, and civil engineering analysis that the project will not increase the landslide/debris flow hazard. (RDR) *[Source: Existing GPP Policy 2.7.2.2]*
- ▶ **Policy HAZ-4.13: Design for Expansive Soils.** The County shall not allow habitable structures or individual sewage disposal systems to be placed on or in expansive soils unless suitable and appropriate safeguards are incorporated into the project design to prevent adverse effects. (RDR) *[Source: Existing GPP Policy 2.8.2.3, modified]*
- ▶ **Policy HAZ-4.15: Subsidence Hazard – Extraction Wells.** The County shall require that potential ground surface subsidence be evaluated prior to approval of new oil, gas, water or other extraction well drilling permits and appropriate and sufficient safeguards are incorporated into the project design and facility operation. (RDR) *[Source: Existing GPP Policy 2.9.2.1, modified]*
- ▶ **Policy HAZ-4.16: Subsidence and Hydroconsolidation Hazard – Structural Design.** Structural design of buildings and other structures shall recognize the potential for subsidence and hydroconsolidation and provide mitigation recommendations for structures that may be affected. (RDR) *[Source: Existing GPP Policy 2.9.2.2, modified]*
- ▶ **Policy HAZ-4.17: Earthquake Fault Hazard Zones.** The County should, where feasible, require that land in Earthquake Fault Hazard Zones and potentially active fault areas be designated Open Space or Agriculture on the General Land Use Diagram. (RDR) *[Source: Existing GPP Policy 2.2.2.4, modified]*

Oak Park Area Plan

- ▶ **Policy OP-65.2 Grading and Maintenance of Slopes Standards.** The County shall require all discretionary grading to be in accordance with the Grading and Maintenance of Slopes standards contained. *[Source: Existing Oak Park Policy 2.1.2.3]*

Ojai Valley Area Plan

- ▶ **Policy OJ-52.1 Seismic and Geologic Hazards.** The County shall require developers to provide all necessary information relative to seismic and geologic hazards which may affect their project. The County shall require the developer to specify how they intend to alleviate any and all identified hazards. *[Source: Existing Ojai Valley Policy 2.1.2.1]*

- ▶ **Policy P-60.2 Seismic and Geologic Hazard Mitigation.** The County shall prohibit development in seismic and geologic hazard areas where hazards cannot be mitigated without significant adverse environmental effects or where public expenditures for mitigating would not be cost-effective. *[Source: Existing Piru Policy 2.1.2.2]*
- ▶ **Policy P-60.3 Geologic-seismic Investigation Requirement.** The County shall require a geologic-seismic investigation be performed and reports submitted for the following types of projects located within the Piru Area of Interest:
 - (a) Essential facilities (e.g., hospitals, schools, major utility facilities, trunk lines, and storage facilities, etc.)
 - (b) High occupancy buildings (e.g., theaters, churches, etc.)
 - (c) Major projects (e.g., multi-story residential buildings, large commercial and industrial buildings and facilities, etc.) *[Source: Existing Piru Policy 2.1.2.3]*
- ▶ **Policy P-60.4 County Building Code Compliance.** The County shall require all development to the geologic and seismic requirements of the County's Building Code. *[Source: Existing Piru Policy 2.1.2.4]*

Lake Sherwood/Hidden Valley Area Plan

- ▶ **Policy LS-51.1 Seismic and Geologic Hazards Developers.** The County shall require developers to provide all necessary information relative to seismic and geologic hazards which may affect their project. The County shall require developers to specify how they intend to alleviate identified hazards. *[Source: Existing Lake Sherwood/Hidden Valley Policy 3.1.2.1]*

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.7-1: Result in Development within a State of California-Earthquake Fault Zone designated by the Alquist-Priolo Earthquake Fault Zoning Act or a County-Designated Fault Hazard Area that Exposes People or Structures to Fault Rupture Hazards or Directly or Indirectly Causes Fault Rupture

As described Section 11.1, "Geologic and Seismic Hazards," of the Background Report, several earthquake faults in the county are classified as active or potentially active according to CGS's Regional Geologic Hazards and Mapping Program. The major faults and fault systems located in the county are the Malibu Coast Fault System, Oak Ridge Fault System, Pine Mountain Thrust Fault and Big Pine Fault, San Cayetano-Red Mountain-Santa Susana Fault System, Semi-Santa Rosa Fault System, and Ventura-Pitas Point Fault. (See Figure 11-1 of the Background Report for the location of these faults and fault systems.) Although it does not run through the county, the San Andreas Fault is located just north of the county's boundary, in some areas less than 1 mile away (Appendix B). Of the faults located within or just outside the county, the Oak Ridge Fault System, the San Andreas Fault System, the Ventura Pitas Point Fault are mapped by the Alquist-Priolo Earthquake Fault Zoning Act (California Department of Conservation 2019). The Malibu Coast Fault System, Oak Ridge Fault System, Pine Mountain Thrust Fault, Big Pine Fault, San Andreas Fault, San Cayetano-Red Mountain-Santa Susana Fault System, Simi-Santa Rose Fault System, and Ventura-Pitas Point Fault are designed in the County's Multi-Hazard Mitigation Plan.

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

Adverse effects that could occur from future development within active fault areas include introduction of people or structures to areas where ground shaking, and ground failure could occur as a result of an earthquake. Implementation of the 2040 General Plan would accommodate future development, including habitable structures and non-residential development, within the vicinity of active faults. Under the 2040 General Plan, land within fault areas would largely be designated as Open Space or Agricultural. The Open Space land use designation allows for a maximum of five percent building lot coverage on a legal lot, intensity of one dwelling unit per parcel, while the Agricultural land use designation allows for one dwelling unit per 40 acres as well as five percent building lot coverage on a legal lot. Additional designations for lands that may intersect with fault lines in the county are Very Low Density Residential, Low Density Residential, and Rural, as well as very limited Industrial land use designations which allow for 50 percent building lot coverage for a legal lot. Maximum density allowed under the above residential land use designations ranges from six dwelling units per acre to one dwelling unit per 2 acres.

Damage and injury resulting from ground shaking, fault rupture, and ground failure, would be substantially lessened through zoning and following building permit construction standards and

review procedures. New construction conforming to the standards of the Ventura County Building Code (Ventura County 2016), which includes the California Building Code (CBC), would provide adequate protection from seismic events through following structural design guidelines for the prevention of seismic hazards. Future development under the 2040 General Plan would be required by law to conform to the Ventura County Building Code, and thus the CBC. The building and safety division of the County ensures that all new construction complies with State and local codes and ordinances through issuing permits and conducting field inspections of construction work for compliance with codes (Ventura County 2019a). Proper engineering, including compliance with the Ventura County Building Code and CBC, would minimize the risk to life and property. Future development within the Coastal Area Plan zone would be required to comply with Hazards Goal 1 of the County's Coastal Area Plan, which requires all new development to evaluate and mitigate impacts from geologic hazards. Oil and gas development in these areas would be required to comply with Section 30262 of the California Coastal Act, which is referenced in the Coastal Area Plan and requires that oil and gas development is performed consistent with the geological conditions of the site (Ventura County 2017). Future development that would fall within the Oak Park Area Plan, Ojai Valley Area Plan, Piru Area Plan, and Lake Sherwood/Hidden Valley Area Plan would also be subject to additional requirements to reduce potential geotechnical hazards such as restricting development in areas where seismic and geologic hazards cannot be mitigated, and requiring mitigation to reduce all seismic and geotechnical hazards. More specifically, Policy OP-65.1 of the Oak Area Plan, Policy OJ-52.1 of the Ojai Valley Area Plan, Policy P-60.1 of the Piru Area Plan, and Policy LS-51.1 of the Lake Sherwood/Hidden Valley Area Plan require developers to provide all necessary information relative to seismic and geologic hazards which may affect their project and identify how to alleviate these hazards. Further, Policy P-60.2 of the Piru Area Plan restricts development in seismic and geologic hazard areas where hazards cannot be mitigated without significant adverse environmental effects or where public expenditures for mitigation would not be cost-effective, while Policy P-60.2 requires geologic-seismic investigation to be performed for certain types of projects like hospitals, schools, high-occupancy buildings, and major projects such as multi-story residential buildings, large commercial and industrial buildings, and facilities.

Furthermore, 2040 General Plan Policies HAZ-4.1, HAZ-4.2, HAZ-4.3, HAZ-4.8, and HAZ-4.17 minimize primary hazards associated with ground shaking, fault rupture, and ground failure by identifying areas subject to these hazards or risks and directing development away from high-risk areas or requiring structural design that addresses these potential risks. For instance, Policy HAZ-4.1 prohibits habitable structures in Earthquake Fault-Rupture Hazard Zones unless a geologic investigation is performed and appropriate and sufficient safeguards, based on this investigation, are incorporated into the project design. Policy HAZ-4.2 is specific to linear projects and requires these projects, such as water, oil, and gas pipelines, to avoid intersecting active faults to the extent possible and, if avoidance is not possible, implement project design that would minimize the effects of any fault movement. Policy HAZ-4.3 requires all structures for human occupancy to incorporate engineering measures to reduce the risk of and mitigate against collapse from ground shaking. Policy HAZ-4.8 restricts development of habitable structures in areas prone to the effects of ground shaking, unless a geotechnical engineering investigation is performed and appropriate and sufficient safeguards, based on this investigation, are incorporated into the project design. Lastly, Policy HAZ-4.17 requires that the County shall designate land in Earthquake Fault Hazard Zones and potentially active fault areas as Open Space or Agriculture land uses on the land use diagram of the 2040 General Plan. With implementation of these policies, adverse effects that could occur from future development

within active fault areas would be substantially lessened. Adherence to existing regulations would safeguard future development under the 2040 General Plan from seismic activity and require that development is sited away from State of California– Earthquake Fault Zone designated by the Alquist-Priolo Earthquake Fault Zoning Act or County–Designated Fault Hazard Areas. The policies of the 2040 General Plan would further reduce the likelihood of impacts related to fault rupture, including ground shaking and ground failure. Implementation of the 2040 General Plan would not expose people or structure to fault rupture hazards, or directly or indirectly cause fault rupture. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.7-2: Have Potential to Expose People or Structures to the Risk of Loss, Injury, or Death involving Ground-Shaking Hazards

As discussed in Impact 4.7-1, the 2040 General Plan would allow future development which could expose people or structures to potential risk of loss, injury, or death from ground-shaking hazards. However, as discussed for Impact 4.7-1, damage and injury resulting from future development within areas subject to ground-shaking hazards would be substantially lessened through building permit review procedures and construction standards. For instance, future development would be required to conform to the standards of the Ventura County Building Code, which includes the CBC, which would provide adequate protection from seismic events, including ground-shaking hazards. The building and safety division of the County ensures that future development complies with State and local codes and ordinances (Ventura County 2019a). Future development within the Coastal Area Plan zone would be required to comply with Hazards Goal 1 of the County's Coastal Area Plan, which requires all new development to evaluate and mitigate impacts from geologic hazards. Oil and gas development in these areas would be required to comply with Section 30262 of California Coastal Act, also included in the County's Coastal Area Plan, which requires that oil and gas development is performed consistent with the geological conditions of the site (Ventura County 2017). Development that would fall within the Oak Park Area Plan, Ojai Valley Area Plan, Piru Area Plan, and Lake Sherwood/Hidden Valley Area Plan would also be subject to additional requirements to reduce potential geotechnical hazards such as restricting development in areas where seismic and geologic hazards cannot be mitigated requiring mitigation to reduce all seismic and geotechnical hazards (Ventura County 2015; Ventura County 2011). To specifically address potential hazards resulting from ground shaking, Policies HAZ-4.3 and HAZ-4.8 require structural design measures and incorporation of other safeguards into project design to protect people and property from impacts related to seismic ground shaking. Adherence to existing regulations and implementation of 2040 General Plan policies would safeguard that future development does not result in risk of loss, injury or death involving ground-shaking hazards. This discussion of potential exposure to risk involving ground-shaking hazards is provided for information purposes only and is neither required by CEQA nor subject to its requirements.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.7-3: Result In Development Within a State of California Seismic Hazards Zone that Exposes People or Structures to Liquefaction Hazards or Directly or Indirectly Cause the Risk of Loss, Injury, or Death Involving Liquefaction

Under the Seismic Hazards Mapping Act, the State of California has prepared Seismic Hazards Zone maps, which identify areas of liquefaction hazards, where landslides may occur during a strong earthquake. Areas with liquefaction potential have been identified throughout the county, particularly along the coast and associated with the Ventura River, the Santa Clara River and tributaries, and Calleguas Creek and tributaries (California Department of Conservation 2019). However, the most vulnerable locations are along the Santa Clara River and in the Oxnard Plain, especially the Preble and Olivas communities and Channel Island Harbor. Areas most prone to liquefaction are outlined in Figure 11-2 of the Background Report, in the County's Seismic Hazards Zone map for liquefaction, and the County's Multi-Hazard Mitigation Plan, and include areas surrounding Port Hueneme and Oxnard, and areas south of Ventura, as well as some areas north of Thousand Oaks and west of Moorpark (see Appendix B). Similarly, areas of the county are located within Seismic Hazard Zones for liquefaction hazards include unincorporated areas surrounding the Cities of Oxnard and Point Hueneme, as well as various areas surrounding the City of Thousand Oaks (CGS 2019).

Future development under the 2040 General Plan is described in Impact 4.7-1. Land use designations under the 2040 General Plan would largely be Open Space and Agricultural, with Residential, Mixed Use, Commercial, and Industrial land use designations concentrated within the Existing Community area designation and the Urban area designation. Land in the vicinity of the Santa Clara River and in the Oxnard Plain, where potential liquefaction hazards are most likely, and within areas mapped as Seismic Hazard Zones for landslide and liquefaction hazards would largely be designated Agricultural. However, there are some lands designated for other uses including Industrial, Commercial, Residential Beach, Rural, Very Low Density Residential, Low Density Residential, Medium Density Residential, and High Density Residential located within areas known to be prone to liquefaction and within Seismic Hazard Zone areas.

Nonetheless, the potential hazards associated with liquefaction and landslide in seismic hazard zones would be substantially lessened with building permit review procedures and construction standards, such as Ventura County Building Code and CBC requirements and CGS Special Publication 117A (CGS 2008). Measures such as soil improvement methods or removal or densification of liquefiable soils would be required for the design of individual future projects to reduce potential hazards from liquefaction. The Ventura County Building Code also requires a study of liquefaction potential for development within areas prone to liquefaction, and recommendations of this study shall be incorporated into project plans (Ventura County 2016). Furthermore, the 2040 General Plan includes policies intended to minimize the risks associated with seismic hazards, including liquefaction. More specifically, Policy HAZ-4.8 restricts development in liquefaction areas unless a geotechnical investigation is performed and appropriate and sufficient safeguards, based on this investigation, are incorporated into the project design. These policies would ensure that development is properly engineered to protect against potential liquefaction hazards.

Through adherence to requirements in the Ventura County Building Code, Special Publication 117A, and the Ventura County Building Code, all improvements and development would be designed to minimize potential risks related to liquefaction. Existing regulatory requirements specify mandatory and relatively prescriptive actions that must occur during project development and that would effectively reduce the inherent hazard. Adherence to existing

regulations and implementation of 2040 General Plan policies would ensure the risk of loss, injury or death from future development involving liquefaction would be reduced. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.7-4: Result in Development that Exposes People or Structures to Landslide or Debris flow Hazards as a Result of Mapped Landslides, Potential Earthquake-Induced Landslide Zones, and Geomorphology of Hillside Terrain or Directly or Indirectly Cause Landslides

The County's Hazards GIS database incorporates maps that depict locations of past landslide events and potential landslides, as well as areas where landslides may occur during a strong earthquake (Potential Earthquake-Induced Landslide Zones). The term landslide is used for varying phenomenon, including debris flow. Thus, debris flow could occur in the same areas where landslide potential exists. As shown in these maps, areas of actual, potential, and earthquake-induced landslides are scattered throughout the county (Ventura County 2019b). According to the Background Report, landslides have occurred in areas along the Rincon Fault, hillsides south of the Santa Clara River, and the east side of the Ventura River. The community of La Conchita, located just southeast of the Santa Barbara County line, has historically and more recently experienced large landslides. Further, several areas of the County are mapped as landslide hazard zones, as classified by CGS and shown in Figure 11-3 of the Background Report. Overall, a large majority of land in the county is located in a Very High Landslide Susceptibility area, as mapped by CGS (Appendix B).

Future development under the 2040 General Plan is described in Impact 4.7-1. Because areas prone to landslides are located throughout the county, it is likely that future development under the 2040 General Plan could be located within areas with landslide hazard potential. Land use designations that would allow future development within Very High Landslide Susceptibility areas include Open Space, Agricultural, Rural, Very Low Density Residential, and Low Density Residential.

Landslides result from a wide range of combinations of natural rock, soil, or artificial fill and may occur because of indiscriminate development of sloping ground or the creation of cut-or-fill slopes in areas of unstable geologic conditions. Future development under the 2040 General Plan that could occur within relatively steep slopes could also provide additional loading, causing landslides or slope failure from unstable soils or geologic units. The potential risks of landslides would be addressed largely through the integration of geotechnical information in the planning and design process to determine the local soil suitability for specific projects in accordance with standard industry practices and State requirements, such as Ventura County Building Code and thus CBC requirements and CGS Special Publication 117A for liquefaction and landslide hazards in seismic hazard zones. For instance, measures such as special grading techniques can be used to prepare stable building lots by providing a means of removing and replacing weak soils, stabilize landslides, improve drainage, minimize ground shaking hazards such as lateral spreading and liquefaction, and reduce differential settlement in order to reduce potential landslide hazards (CGS 2008). Further, the Hazards and Safety Element includes various policies that further reduce potential landslide hazards. For instance, Policy HAZ-4.6 requires development to minimize removal of vegetation to protect against soil erosion, rock slides, and landslides. Policy HAZ-4.8 and Policy HAZ-4.10 would direct development away from areas

away from areas prone to landslides or mapped landslide/debris flow hazard areas, or require geotechnical engineering investigations and sufficient safeguards if development in these areas does occur. Policy HAZ-4.9 requires geotechnical reports that demonstrate adequate slope stability and construction methods for building and road construction on slopes greater than 50 percent. Lastly, Policy HAZ-4.11 would restrict the alteration of land in landslide/debris flow hazard areas, including concentration of water through drainage, irrigation or septic systems, removal of vegetative cover, and undercutting of the bases of slopes or other grading activity unless demonstrated by geologic, geotechnical, and civil engineering analysis that the project will not increase the landslide/debris flow hazard. These 2040 General Plan policies would substantially lessen the potential for adverse impacts from landslide hazards.

Therefore, although implementation of the 2040 General Plan could accommodate future development in areas of high landslide susceptibility, with adherence to regulations such as the Ventura County Building Code, including the CBC, Special Publication 117A, Ventura County Building Code requirements, and 2040 General Plan policies, future development would be designed to minimize potential risks related to landslide and debris flow hazards, and would not directly or indirectly cause landslides. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.7-5: Result in Development that Exposes People or Structures to the Risk of Loss, Injury, or Death Involving Soil Expansion or Directly or Indirectly Cause Soil Expansion If Development Is Located within an Expansive Soils Hazard Zone or Where Soils with an Expansion Index Greater Than 20 is Present

The County's Hazards GIS database incorporates maps that show expansive soils hazard zones are present throughout the county. Most of the county is located within zones of medium expansive soil potential while areas with high expansive soil potential are scattered throughout the county, including areas surrounding Thousand Oaks and Simi Valley, Camarillo, Ojai, and areas south of Thousand Oaks and southeast of Port Hueneme (Ventura County 2019b).

Future development under the 2040 General Plan could occur within known expansive soils areas. Future development under the 2040 General Plan is described in Impact 4.7-1. Land use designations under the 2040 General Plan located in areas of high expansive soil potential include Rural, Very Low Density Residential, Low Density Residential, Medium Density, and Commercial.

Soils that exhibit expansive properties when exposed to varying moisture content over time could cause damage to foundations, walls, or other improvements located on those soils. Structures, including residential units and commercial buildings, could be damaged as a result of settlement where structures are underlain by expansive soils. However, future development under the 2040 General Plan would be required to comply with standard industry practices and State requirements, such as the CBC, also included in the Ventura County Building Code. Further, the Ventura County Building Code requires design standards such as special foundation design for development proposed within areas known to host critically expansive soils. Furthermore, the 2040 General Plan includes Policy HAZ-4.13, which would minimize risks associated with expansive soils by requiring geotechnical engineering investigations and incorporation of appropriate safeguards into the project design to prevent adverse effects from soil expansion. Future development under the 2040 General Plan could occur in areas where the expansion index is greater than 20. However, per Section 1803 of the Ventura County

Building Code, the classification and engineering properties of the soil at each building site shall be determined when required by the Building Official. When required by the Building Official, the expansive characteristics of soil shall be determined by procedures in accordance with Section 1803.3 of this Code and the soils shall be classified according to Table 1809.7 of the Ventura County Building Code. If expansive soils have been identified at a project site, foundations of structures shall require special design considerations in accordance with Section 1808.6 of the Ventura County Building Code. Thus, with compliance with existing regulations, impacts would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.7-6: Result in Development that Expose People or Structures to the Risk of Loss, Injury, or Death Involving Subsidence or Directly or Indirectly Cause Subsidence If Development Is Located within a Subsidence Hazard Zone

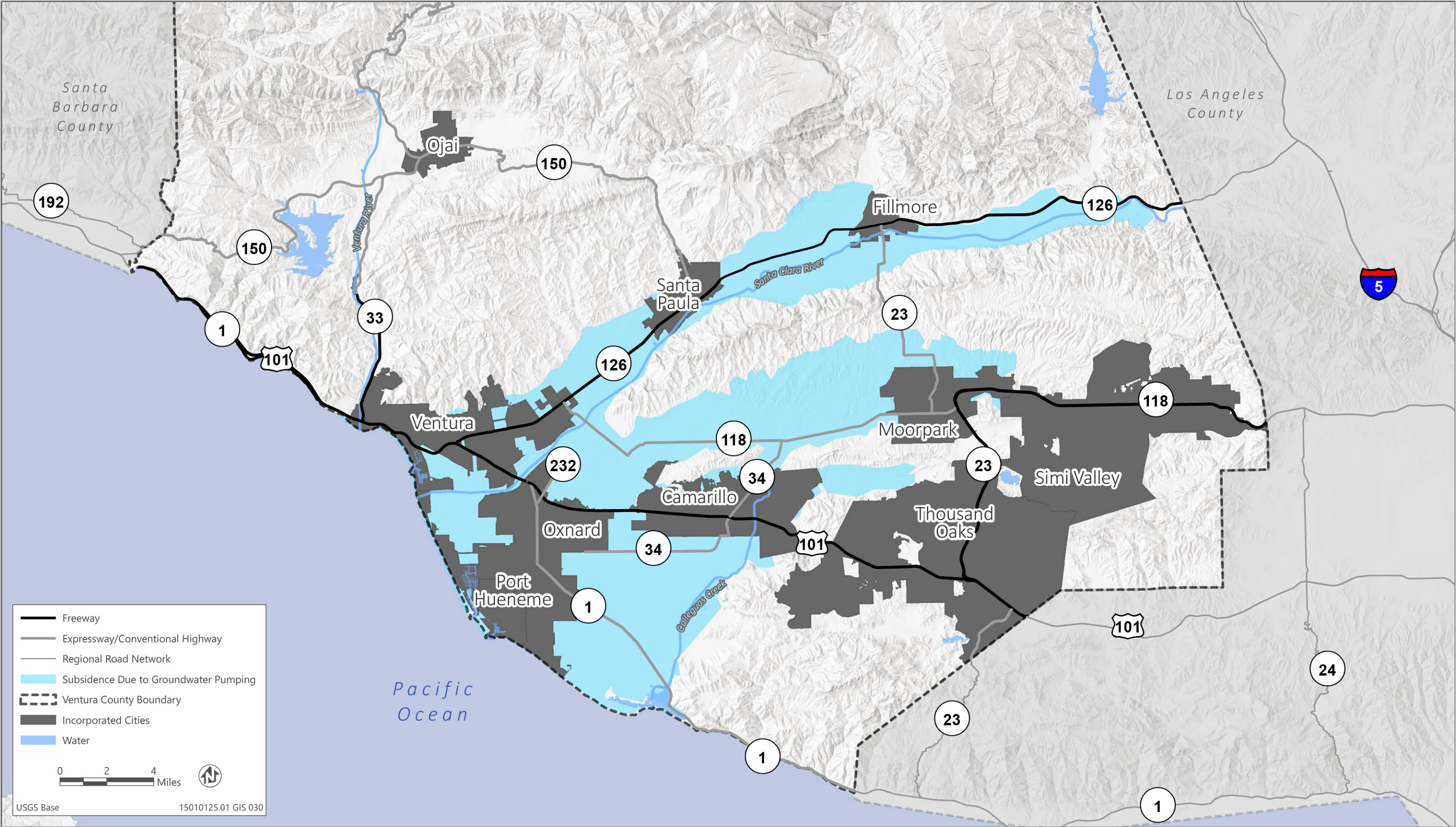
Subsidence is any settling or sinking of the ground surface over a regional area arising from surface or subsurface causes, such as earthquakes or fluid or gas extraction. The most common type of subsidence occurs involves the extraction of a large quantity of water from an unconsolidated aquifer. Subsidence can result in structural damage to buildings if they are not properly designed. As shown on Figure 4.7-1, subsidence hazard zones include the Santa Clara River Valley, Oxnard Plain, and Las Posas Valley. These areas experience subsidence because of groundwater extraction. Future development under the 2040 General Plan could occur within these subsidence areas. Future development under the 2040 General Plan is described in Impact 4.7-1.

Land prone to subsidence in the vicinity of the Santa Clara River and in the Oxnard Plain would be designated primarily Agricultural under the 2040 General Plan. However, areas known to be prone to subsidence located in subsidence hazard zones, including along the Santa Clara River, Ventura River, and surrounding Port Hueneme, Oxnard, and the southwestern portion of Camarillo include Agricultural, Open Space, Rural, Industrial, Commercial, Residential Beach, Very Low Density Residential, Low Density Residential, Medium Density Residential, and High Density Residential land use designations.

The risk of damage and injury resulting from future development within areas prone to subsidence or areas related to oil, gas, or groundwater withdrawal would be substantially lessened through building permit review procedures and construction standards. Future development must conform to the standards of the Ventura County Building Code, which includes the CBC. Policy HAZ-4.15 requires that potential ground surface subsidence be evaluated for new oil, gas, water or other extraction well drilling permits and that appropriate and sufficient safeguards are incorporated into project design and facility operation. Policy HAZ-4.16 requires that structural design of buildings and other structures shall recognize the potential for subsidence and hydroconsolidation and provides mitigation recommendations for structures that may be affected. Compliance with the CBC, the Ventura County Building Code, and 2040 General Plan policies would substantially lessen the risk of loss, injury, or death associated with future development located within a subsidence hazard zone, and safeguard future development from direct or indirect cause subsidence. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.



Source: Data adapted from USGS in 2019

Figure 4.7-1 Subsidence Due to Groundwater Pumping

4.8 GREENHOUSE GAS EMISSIONS

This section evaluates the potential effects of implementing the 2040 General Plan for greenhouse gas (GHG) emissions, including whether the project would conflict with applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions, or generate GHG emissions, either directly or indirectly, that would have a significant effect on the environment. As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

The County received 67 public comments in written or oral form pertaining to GHG emissions during the notice of preparation (NOP) comment period for this EIR, which occurred from January 14 through February 19, 2019. These comments provided insight on the conditions within the community, recommendations on approaches for analyzing emissions, and suggestions for new or revised policies and programs aimed at reducing GHG emissions. All comments were considered during preparation of the 2040 General Plan and some resulted in changes or additions to the version of the 2040 General Plan presented to the public, the Planning Commission, and the Board of Supervisors at hearings in August and September 2019. Themes of these public comments included support for densification of land use, carbon sequestration, land conservation, sustainable energy, GHG target setting, and encouraging alternative modes of transportation to reduce vehicle miles travelled (VMT). These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

4.8.1 Background Report Setting Updates

REGULATORY SETTING

In addition to the information provided in Chapter 12, “Climate Change,” of the Background Report (Appendix B), the following information is relevant to understanding the potential GHG impacts of the 2040 General Plan:

- ▶ Executive Order (EO) B-55-18, which calls for California to achieve carbon neutrality by 2045 and achieve and maintain net negative GHG emissions thereafter. These targets are in line with the scientifically established levels needed in the United States to limit the rise in global temperature to no more than 2 degrees Celsius (°C), the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected; these targets also pursue efforts to limit the temperature increase even further to 1.5 °C (United Nations 2015:3).
- ▶ The California Air Resources Board (CARB) has adopted GHG Regulations for Crude Oil and Natural Gas, which requires mandatory reporting for methane emissions associated with oil and gas production on State and private lands and requires retrofitting of associated equipment to reduce methane leakage (CARB n.d.). Enforcement of these regulations at

the local level is supported by the Ventura County Air Pollution Control District (VCAPCD), which has published Compliance Assistance Advisory for reporting (VCAPCD 2018a) and an Implementation and Enforcement Guide to provide guidance to VCAPCD staff, the public, and the regulated community when implementing, complying with, and enforcing CARB's GHG Regulations for Crude Oil and Natural Gas (VCAPCD 2018b). This guidance, issued November 2018, is applicable to existing wells as well as new wells that require permits from the VCAPCD Air Pollution Control Officer for construction and operation (VCAPCD 2019a,b).

- ▶ To protect public health and agriculture from the adverse effects of air pollution by identifying air pollution problems and developing a comprehensive program to achieve and maintain state and federal air quality standards, the Ventura County APCD Implementation and Enforcement Policy Guide provide guidance to both VCAPCD staff, the public, and the regulated community. The VCAPCD staff enforces the Greenhouse Gas Emission standards through both their own regulations and inspections and works with CARB's GHG staff and Enforcement Division staff. The policy guide provides a framework and guidance for enforcement procedures regarding the GHG regulation and VCAPCD's existing oilfield regulations in VCAPCD's Rules 71.1 and 74.10. The fugitive methane emissions are controlled through leak detection (VOC's measured as methane) and repair for ongoing leak surveys at subject facilities. These surveys are also conducted and recorded by the subject facility on a quarterly basis. Leak detection and repair requirements are also implemented during the VCAPCD facility inspections through various methods, including annual compliance, complaint investigation and follow-up, and break-down reports and follow-up. Compliance requirements include repair of subject equipment to leak-free status and confirmation of leak-free status via re-inspection by VCAPCD enforcement staff.
- ▶ California's 2017 Climate Change Scoping Plan (2017 Scoping Plan), prepared by the CARB, outlines the main strategies California will implement to achieve the target for statewide GHG reduction to 40 percent below 1990 levels by 2030, in accordance with Senate Bill (SB) 32. The 2017 Scoping Plan is also intended to "substantially advance toward our 2050 climate goals" in accordance with goals set in Executive Order (EO) S-3-05. The plan identifies the reductions needed by each GHG emission sector (e.g., transportation, industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste). To support the plan's goals of increasing carbon sequestration, in addition to GHG reduction, CARB and other State agencies are currently developing a Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal of Executive Order B-55-18.
- ▶ Updates to California's Title 24 Building Energy Efficiency Standards (Part 6) and Green Building Standards Code (Part 11) have been adopted by the California Energy Commission (CEC) and are scheduled to go into effect on January 1, 2020. The Building Energy Efficiency Standards are enforced at the local level through building departments and set the minimum code requirements for new commercial and residential building construction and major alterations. The adoption of this code is estimated to reduce GHG emissions by 700,000 metric tons of carbon dioxide equivalent (CO₂e) over the three years that the code will be in place until the next scheduled update. Additional information on the requirements of the Title 24 standards can be found in Section 4.6, "Energy," of this draft EIR.
- ▶ On August 2, 2018, the National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (EPA) proposed the Safer Affordable Fuel-Efficient

Vehicles Rule (SAFE Rule). This rule addresses emissions and fuel economy standards for motor vehicles and is separated in two parts as described below.

- Part One “One National Program” (84 FR 51310) revokes a waiver granted by EPA to the State of California under Section 209 of the Clean Air Act to enforce more stringent emission standards for motor vehicles than those required by EPA for the explicit purpose of GHG reduction, and indirectly, criteria air pollutant and ozone precursor emission reduction. This revocation became effective on November 26, 2019, restricting the ability of CARB to enforce more stringent GHG emission standards for new vehicles and set zero emission vehicle mandates in California. CARB has estimated the vehicle tailpipe and evaporative emissions impacts to criteria air pollutants from SAFE Rule Part One and has provided off-model adjustment factors to adjust emissions output from CARB’s Emission Factor (EMFAC) model.
- Part Two would address Corporate Average Fuel Economy (CAFE) standards for passenger cars and light trucks for model years 2021 to 2026. This rulemaking proposes new CAFE standards for model years 2022 through 2026 and would amend existing CAFE standards for model year 2021. The proposal would retain the model year 2020 standards (specifically, the footprint target curves for passenger cars and light trucks) through model year 2026, but comment is sought on a range of alternatives discussed throughout the proposed rule. This proposal addressing CAFE standards is being jointly developed with EPA, which is simultaneously proposing tailpipe carbon dioxide standards for the same vehicles covered by the same model years. As of January 10, 2020, Part Two is not final. The timing of a final SAFE Rule Part Two and the outcome of any pending or potential lawsuits (and how such lawsuits could delay or affect its implementation) are unknown at this time.

ENVIRONMENTAL SETTING

In addition to the information provided in Chapter 12, “Climate Change,” of the Background Report (Appendix B), the following information is relevant to understanding the potential GHG impacts of the 2040 General Plan:

- ▶ The Climate Action Plan (CAP) referenced in Section 12.1, “Greenhouse Gas Emissions,” of the Background Report has been integrated into the elements of the 2040 General Plan.

4.8.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

According to the County’s Initial Study Assessment Guidelines (ISAG), the primary concern for CEQA analyses pertaining to GHG emissions should be the cumulative impact of a project’s incremental GHG emissions when viewed in connection to past, current, and probable future project GHG emissions. The ISAG explain that under the State CEQA Guidelines, each lead agency may develop its own approach to performing a climate change analysis for projects that generate GHG emissions (Ventura County 2011:125). The ISAG also explain that CEQA compliance entails three basic steps:

- ▶ identify and quantify the GHG emissions;
- ▶ assess the significance of the impact on climate change; and,
- ▶ if the impact is found to be significant, identify alternatives and/or mitigation measures that will reduce the impact below significance.

Additionally, Section 6.10 of the 2040 General Plan explains that the CAP is integrated within the plan and will serve as a qualified “plan for the reduction of greenhouse gases” that could allow for the cumulative impacts analyses of GHG emissions for future projects in the County to tier from the GHG analysis contained in this draft EIR in accordance with CEQA Guidelines Section 15183.5. This section states that to be used for CEQA streamlining for future projects the plan must follow the steps listed below. Items underlined are requirements that overlap with the CEQA compliance steps in the ISAG.

- ▶ Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.
- ▶ Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable.
- ▶ Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area.
- ▶ Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.
- ▶ Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendments if the plan does not achieve specified levels.
- ▶ Be adopted in a public process following environmental review.

The actions described in the following sections were used during development of the integrated CAP to conform with the ISAG guidance and are therefore relevant to the methodology used for analyzing the environmental impacts of the 2040 General Plan’s GHG emissions. Supporting technical documentation for GHG inventory, forecasting and reduction measures are included in Appendix D of this draft EIR.

GHG Emissions Inventory

The GHG emissions inventory for the unincorporated county was updated from a base year of 2012 to 2015 during preparation of the 2040 General Plan to account for the availability of more current activity data and methods. This inventory update included GHG emissions from multiple sectors including agriculture, building energy, off-road equipment, solid waste, stationary sources, transportation, and water/wastewater. Consistent with guidance from the Governor’s Office of Planning and Research (OPR), the 2015 community-wide GHG inventory was prepared using the U.S. Community Protocol for Accounting and Reporting of GHG Emissions, Version 1.1 (International Council for Local Environmental Initiatives (ICLEI) 2013). In response to comments on the NOP, the inventory was updated to use global warming potential (GWP) values for methane and nitrous oxide from the Intergovernmental Panel on

Climate Change's (IPCC) Fifth Assessment Report (AR5). This is a change in GWP values from the IPCC Fourth Assessment Report (AR4), which were originally used in the inventory, and in Appendix B of the 2040 General Plan for consistency with the State's Scoping Plan. GWP values apply a weight to gases that have been determined by scientific studies to have increased GHG effects relative to the most common GHG, carbon dioxide (CO). These weighted gasses are combined with CO to form a common unit of measurement called CO_{2e}. For this analysis GWP values of 28 for methane and 265 for nitrous oxide were used for consistency with AR5 (Myhre et. al 2013). Table 4.8-1 shows the 2015 GHG emissions for Ventura County, which were used as the baseline for the integrated CAP.

Table 4.8-1 Baseline 2015 GHG Emissions for the Unincorporated County

Sector	MT CO _{2e}	% of countywide emissions ¹
Agriculture	260,849	13.7
Building Energy	322,048	17.0
Off Road Equipment	52	<0.1
Solid Waste	333,167	17.6
Stationary Source	275,096	14.5
Transportation	692,753	36.5
Water and Wastewater	13,148	<0.1
Total	1,897,112	

1: Percentages may not add to 100 percent due to rounding.

Projections

GHG emissions in the unincorporated area of the county were forecast through 2020, 2030, 2040, and 2050 using growth rates for population, employment, and housing prepared by the Southern California Association of Governments (SCAG) for the 2020 Regional Transportation Plan and Sustainability Communities Strategy (SCAG 2017). Transportation sector GHG emissions for on-road vehicles were projected using VMT forecasts obtained from the Ventura County Transportation Commission (VCTC). These VMT forecasts were adjusted using recommended methods from the SB 375 (2008) Regional Targets Advisory Committee and converted to CO_{2e} using emissions factors from CARB's Emissions Factor model. The business-as-usual forecasts were adjusted to account for State and federal legislative and regulatory actions that will reduce future emissions from activities within the unincorporated area, without any additional local government action. Legislation and regulations considered include:

- ▶ SB 100 (2018) Renewable Portfolio Standard (RPS) Program and Zero-Carbon Electricity Standards,
- ▶ CARB Oil and Natural Gas Regulations,
- ▶ AB 341 (2011) Solid Waste Diversion,
- ▶ SB 1383 (2016) Organic Waste Regulations,
- ▶ AB 1493 (2002) Clean Car Standards, and
- ▶ CARB Advanced Clean Car Standards (2012) regulatory update to AB 1493 (2002) Standards.

Legislative actions include existing or reasonably foreseeable regulations, programs, or a combination thereof that are required by State or federal legislation and will result in widespread mandatory reductions across various emissions sectors. Table 4.8-1 shows baseline emissions for 2015 and Table 4.8-2 provides forecast emissions in 10-year intervals from 2020 to 2050. Although 2050 is beyond the 2040 General Plan horizon, GHG emissions are projected through 2050 for the analysis to be consistent with State law, as described in the following section. The projections described in this document are contained in Appendix B, Section B.1.2, of the 2040 General Plan. These figures differ from the numbers contained in the preliminary public draft of the 2040 General Plan because the figures in this EIR analysis use AR5 GWP values rather than AR4. AR4 was previously used for consistency with the State's 2017 Scoping Plan but was changed in response to comments received during the public scoping period for the 2040 General Plan.

Table 4.8-2 Forecast GHG Emissions for Unincorporated Ventura County 2020 to 2050

Sector	Forecast Emissions ¹ (MT CO ₂ e)			
	2020	2030	2040	2050
Agriculture	256,223	248,882	241,541	234,200
Building Energy	308,629	285,079	225,567	197,996
Off Road Equipment	52	52	52	52
Solid Waste	302,811	278,381	270,289	262,560
Stationary Source	287,845	314,526	343,679	375,535
Transportation	625,263	487,058	446,355	450,232
Water and Wastewater	13,148	13,148	13,148	13,148
Total	1,793,971	1,627,124	1,540,630	1,533,723

Notes: MT CO₂e = metric tons of carbon dioxide equivalents, comprised of carbon dioxide, methane, and nitrous oxides. ¹Includes legislative reductions from State and federal programs.

Source: Ascent Environmental, 2019

Targets

The CAP contained in the 2040 General Plan sets GHG reduction targets at 10-year intervals that are aligned with the State's legislative GHG reduction targets and other reduction goals. As directed in Assembly Bill (AB) 32 (2006), SB 32 (2016), and EOs B-30-15 and S-3-05, the State aims to reduce annual statewide GHG emissions to 1990 levels by 2020, 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050. CARB's 2017 Scoping Plan recommends that local agencies establish community-wide GHG reduction goals for local climate action of GHG reduction plans that will help the State achieve its 2030 target and longer-term 2050 goal. Based on this guidance equivalent targets were calculated for the 2040 General Plan relative to the State's 2015 statewide baseline and targets. Specifically, the State's 2015 GHG emissions inventory was compared to the State's 2020, 2030, and 2050 mass emissions targets relative to its 1990 inventory, from which specific percent reductions relative to 2015 were developed. Therefore, consistent with the State's targets relative to 2015 levels, the 2040 General Plan's targets are expressed according to the percentage reductions in GHG emissions relative to the unincorporated county's 2015 community-wide GHG emissions levels as shown in Table 4.8-3.

Table 4.8-3 2040 General Plan Target Reduction from 2015 Baseline Emissions Levels, 2020 to 2050

	2020	2030	2040	2050
Target Percentage Below 2015 Baseline GHG Emission Levels	2.1%	41.3%	60.9%	80.4%
GHG Emissions Target (MT CO ₂ e)	1,856,620	1,113,972	742,648	371,324
GHG Reductions Needed from Forecast GHG Emissions to Meet Targets (MT CO ₂ e)	-62,649	513,153	797,982	1,162,398

Notes: the negative number for GHG reductions in 2020 means that the forecast GHG emissions for 2020 will be below the 2020 target.

Source: Ascent Environmental, 2019

Reduction Measures

The 2040 General Plan intends to reduce GHG emissions and improve local resilience to the anticipated impacts of climate change through approximately 150 policies and 77 programs focused on climate action. These policies and programs are included throughout each of the 2040 General Plan's elements and are denoted by a "CAP" icon. As provided below, 118 of the policies and 45 of the programs were designed to reduce GHG emissions. The plans and programs for GHG reduction address future development anticipated under the 2040 General Plan, as well as existing activities within the county contributing to GHG emissions as identified in the 2015 community GHG emissions inventory. The policies included in the 2040 General Plan serve as guidance for decision making, while the programs operationalize these policies into implementable actions. For this reason, the impact analysis in this draft EIR evaluated the GHG reducing effects of policies proposed for implementation by programs included in the 2040 General Plan.

The "2040 General Plan Policies and Implementation Programs" section below also provides a description of the reduction measures along with a reference to the sections of the 2040 General Plan where they can be found. The GHG reduction measures contained in the 2040 General Plan are designed to provide the GHG reductions necessary to address the gap between legislatively adjusted business-as-usual emissions and reduction targets as shown in the third row of Table 4.8-3, above. The analyses contained in the impact section of this draft EIR evaluate whether the GHG reduction benefits of these policies and programs are supported by substantial evidence as required in 15183.5 of the State CEQA Guidelines. Substantial evidence leading to estimates of GHG emissions resulting from implementation of the 2040 General Plan includes both qualitative and quantitative assessments, consistent with Section 15064.4(a) of the State CEQA Guidelines.

THRESHOLDS OF SIGNIFICANCE

As discussed in the "Approach to the Environmental Analysis" section, the thresholds used to determine the significance of the 2040 General Plan's impacts are based on Ventura County's adopted ISAG, which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides initial study checklist questions to consider when determining the significance of a project's impacts.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, GHG emissions are discussed in Section 24 of the ISAG, with subsection B referencing State CEQA Guidelines provisions related to the analysis of GHG emissions, including Section 15064.4 regarding the determination of significance of GHG emissions. The ISAG reference the State CEQA Guidelines as a source for establishing GHG thresholds through the following statement:

“Threshold of significance criteria for determining whether a project’s GHG emissions is significant, either project specifically or cumulatively, is set forth in CEQA Guidelines Sections 15064(h)(3), 15064.4, 15130(b)(1)(B) and (d), and 15183.5, all of which may be used individually, collectively or in combination with one another in making such a determination” (Ventura County 2011).

The ISAG does not establish a specific threshold for GHG emissions but describes preliminary research conducted by VCAPCD regarding GHG-related CEQA thresholds and proposed CEQA guidance from OPR’s “CEQA and Climate Change” Technical Advisory from 2008.

Ventura County Air Pollution Control District

Following publication of the ISAG in 2011, VCAPCD published a memorandum entitled *Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County* (VCAPCD 2011). This document explored programmatic thresholds based on variations of a no threshold approach, a zero-threshold approach, or a non-zero approach. While VCAPCD has not adopted the GHG thresholds explored as part of this non-binding informational document, the two options described below were included in the memorandum. Because ISAG describes the VCAPCD research into CEQA thresholds for GHG emissions, the contents of the VCAPCD memorandum are described below and were considered in the formulation of thresholds of significance for this draft EIR.

Threshold Option 2.2 Quantitative Threshold Based on Market Capture

This option employs a “bright line” threshold to capture of 90 percent or more of likely future discretionary developments. The objective is low enough to capture a substantial fraction of future residential and non-residential land use development expected to be constructed to accommodate future statewide population and job growth, while the emission threshold is high enough to exclude most small land use development projects that contribute a minor fraction of cumulative statewide GHG emissions. Another advantage of this option is that it is simple and easy to understand and implement.

Threshold Option 2.7: Efficiency-Based Thresholds

This option is based on efficiency metrics, such as GHG emissions per capita or employment, or some combination thereof, set to ensure consistency with AB 32 GHG emission reduction goals. GHG efficiency thresholds can be determined by dividing the estimated 2020 AB 32 GHG emissions inventory goal (allowable GHG emissions), by the estimated 2020 population and employment, referred to as the Service Population (SP). The service population for a residential project would be the number of new residents. The service population for a commercial project would be number of employees. The service population for a mixed-use project would be the number of residents plus employees. This calculation gives approximate efficiency threshold values of 4.6 MT CO₂e per SP for individual projects (housing developments, shopping centers, etc.), and 6.6 MT CO₂e per SP for general plans, etc. The benefit of an efficiency-based threshold is that it tends to encourage mixed-use, infill development over more traditional “sprawl-type” development (i.e., large suburban residential housing tracts or commercial shopping centers) that has been the norm in California for many decades.

In concluding remarks, VCAPCD states that establishing GHG thresholds for CEQA analyses poses a challenge because “CEQA was designed for and works best for projects with local to regional scale environmental effects, such as those on local roadways, waterways, wildlife habitats, and in areas that are relatively small and well defined. CEQA does not work as well or at all on a global scale. This is because micro-scale effects, such as additional vehicular traffic from a new shopping center, cannot be seen on large scales” (VCAPCD 2011). The district further concluded that it would continue to explore options for GHG thresholds in Ventura County “with preference for GHG threshold consistency with the South Coast AQMD (SCAQMD) and the SCAG region” (VCAPCD 2011).

The GHG thresholds in the current SCAQMD Air Quality Significance Threshold guidance focus exclusively on industrial facilities. In this guidance, GHG emissions from industrial facilities are considered significant if they exceed 10,000 MT CO_{2e} per year (SCAQMD 2019).

2019 CEQA Guidelines Amendments

Since the publication of the ISAG in 2011, the GHG-related provisions of the State CEQA Guidelines, which are referred to as proposed guidance in the ISAG, have been adopted. The most recent version of the State CEQA Guidelines became effective on December 28, 2018. Appendix G of the State CEQA Guidelines provides considerations for determining the significance of a project’s GHG impacts, in the form of initial study checklist questions.

Appendix G, Section VIII - Greenhouse Gas Emissions

Appendix G, Section VIII of the State CEQA Guidelines states that the potential significance of GHG emissions may be determined by lead agencies by evaluating whether the project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or, conflict with an applicable plan, policy, or regulation for the purpose of reducing the emissions of GHGs.

Section 15064(h)(3)

This section is intended to determine whether an EIR is required for a project based upon whether the project’s potential cumulative impacts are addressed by existing plans. Because an EIR is being prepared for the 2040 General Plan this section would not apply.

Section 15064.4

This section “Determining the Significance of Impacts from Greenhouse Gas Emissions” provides the following guidance to lead agencies:

A lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project. This effort can rely on quantification, qualitative analyses or performance-based standards at the discretion of the lead agency.

In determining the significance of a project’s GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project’s emissions to the effects of climate change. A project’s incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency’s analysis should consider a timeframe that is appropriate for the project. The agency’s analysis also must reasonably reflect evolving scientific knowledge and State regulatory schemes.

A lead agency should consider the following factors, among others, when determining the significance of impacts from GHG emissions on the environment: the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions; in determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable; a lead agency may use a model or methodology to estimate GHG emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use.

Section 15130(b)(1)(B)

This section states that the discussion of cumulative impacts should reflect the severity of the impacts and their likelihood of occurrence, including a summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

Section 15130(d)

This section states that previously approved land use documents, including, but not limited to, general plans, specific plans, regional transportation plans, plans for the reduction of GHG emissions, and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impacts analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or areawide cumulative impacts of the proposed project have already been adequately addressed, as defined in section 15152(f), in a certified EIR for that plan.

Section 15183.5

This section states that to be used for CEQA streamlining for future projects the plan must meet several conditions. The plan must quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area; establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable; identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area; specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level; establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and be adopted in a public process following environmental review.

Thresholds of Significance for this Draft EIR

The thresholds used to analyze potential environmental impacts in this draft EIR are based on the criteria set forth in Appendix G, Section VIII with the additional sections of the State CEQA Guidelines described in the previous headings used as indicators to determine consistency with the overarching objectives sought by the criteria.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant GHG emissions impact if it would:

- ▶ Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
- ▶ Conflict with an applicable plan, policy, or regulation for the purpose of reducing the emissions of GHGs.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs of the 2040 General Plan related to GHG emissions and, specifically, the thresholds of significance identified above, are included below.

Land Use and Community Character Element

- ▶ **Policy LU-1.1: Guidelines for Orderly Development.** The County shall continue to promote orderly and compact development by:
 - working with cities in Ventura County and the Ventura Local Agency Formation Commission (LAFCO) to promote and maintain reasonable city boundaries and Spheres of Influence to prevent growth-inducing urban development in unincorporated areas, and
 - require unincorporated urban development to be located in areas designated as Existing Communities and unincorporated urban centers consistent with the Guidelines for Orderly Development and as defined in Policy LU-1.2.
- ▶ **Policy LU-11.3: Design.** The County shall require new commercial and industrial developments to be designed to be generally compact, grouped and consolidated into functional units providing for sufficient off-street parking and loading facilities, maximize pedestrian and vehicle safety, reduce vehicle miles traveled (VMT), encourage electric vehicle charging, and minimize land use conflicts and traffic congestion. The County shall require that commercial and industrial discretionary development is designed to provide adequate buffering (e.g., walls, landscaping, setbacks) and operational conditions (e.g., hours of operation, and scheduling of deliveries) to minimize adverse impacts (e.g., noise, glare, and odors) on adjoining and adjacent residential areas.
- ▶ **Policy LU-11.4: Sustainable Technologies.** The County shall encourage discretionary development on commercial- and industrial- designated land to incorporate sustainable technologies, including energy- and water-efficient practices and low- or zero-carbon practices.

- ▶ **Policy LU-16.5: Multimodal Access to Commercial Development.** The County shall encourage discretionary commercial development to promote ease of pedestrian/bicycle access to encourage walk-in business, while providing sufficient off-street parking.
- ▶ **Policy LU-16.9: Building Orientation and Landscaping.** The County shall encourage discretionary development to be oriented and landscaped to enhance natural lighting, solar access, and passive heating or cooling opportunities to maximize energy efficiency.
- ▶ **Policy LU-18.5: Participation in Climate Change Planning.** The County shall encourage stakeholders in designated disadvantaged communities who are vulnerable to sea level rise or other climate change impacts to have the opportunity to learn about and participate in the decision-making process for adaptation planning within Ventura County.
- ▶ **Policy LU-22.2: Implementation Program Monitoring.** The County shall maintain and annually review the General Plan Implementation Programs before the preparation of the County's Annual Budget. As part of this process, the County shall update the prioritization of programs based on applicability, relevance, timing of initiation, and availability of funding.

Implementation Programs

- ▶ **Implementation Program A: Guidelines for Orderly Development Implementation.** The County shall continue to implement the Guidelines for Orderly Development and work with cities to promote orderly and compact, increased options for affordable housing, lower vehicle miles traveled, and limit sprawl.
- ▶ **Implementation Program P: Annual General Plan Implementation Review.** The County shall review the General Plan annually, focusing on the status and progress of program implementation. The County shall prepare a report to the Board of Supervisors summarizing the status of implementation programs and any recommendations for General Plan amendments

Circulation, Transportation and Mobility Element

- ▶ **Policy CTM-2.1: Complete Streets.** The County shall prepare and adopt Complete Streets Design Guidelines to be used when constructing new roadways or improving existing roadways where Complete Streets would be appropriate/feasible. The Complete Streets Design Guidelines shall employ a context-sensitive approach to planning and designing the road and street network to reflect the distinct agricultural, rural, or urban character of a particular location.
- ▶ **Policy CTM-2.2: Functional Classification.** The County shall plan a roadway system that has adequate capacity and is designed to provide reasonable and safe use by vehicles, public transportation, bicycles and pedestrians with minimum delay pursuant to LOS standards described in Policy CMT-1.2. The road system should follow Federal Highway Administration (FHWA) classification.
- ▶ **Policy CTM-2.3: County Road Access.** The County shall require discretionary development with access onto a County road to have the access point(s) designed and built to County standards.
- ▶ **Policy CTM-2.4: Transportation System Safety.** The County shall strive to provide safe operating conditions for all appropriate modes and uses of County roadways.

- ▶ **Policy CTM-2.5: Emergency Services.** The County shall coordinate the development and maintenance of all transportation facilities with emergency service providers to ensure continued emergency service operation and service levels.
- ▶ **Policy CTM-2.6: Regional Transportation Planning.** The County shall work with Caltrans, Southern California Association of Governments (SCAG), Ventura County Transportation Commission (VCTC), and cities in the county to plan, develop, and maintain regional transportation facilities and services, and to identify existing and future transportation corridors that should be linked across jurisdictional boundaries so that sufficient right-of-way may be preserved.
- ▶ **Policy CTM-2.7: Congestion Management Program.** The County shall coordinate with Ventura County Transportation Commission (VCTC) to implement and update the Congestion Management Program (CMP). The County shall also encourage consideration of multimodal performance measures as part of future updates to the CMP.
- ▶ **Policy CTM-2.8: Congestion Management Program and County Regional Network Consistency.** For those portions of the County's Regional Road Network currently not designated as part of the Congestion Management Program (CMP), the County shall coordinate with Ventura County Transportation Commission (VCTC) to formally designate applicable County maintained roadways as part of the CMP.
- ▶ **Policy CTM-2.9: State Route 118 Improvement in Saticoy Area.** The County shall work with the Ventura County Transportation Commission (VCTC) and Caltrans to reprioritize the re-striping of SR 118 from Vineyard Avenue to Darling Road on the Ventura County Congestion Management Plan and the Caltrans list of projects to provide for an additional lane in each direction of travel.
- ▶ **Policy CTM-2.10: Safe Routes to School.** The County shall work with public and private schools to identify and expand safe routes to school, where feasible.
- ▶ **Policy CTM-2.11: Efficient Land Use Patterns.** The County shall establish land use patterns that promote shorter travel distances between residences, employment centers, and retail and service-oriented uses to support the use of public transportation, walking, bicycling, and other forms of transportation that reduce reliance on single-passenger automobile trips.
- ▶ **Policy CTM-2.12: Countywide Bicycle Lane and Trail System.** The County shall coordinate with the cities in the county and Ventura County Transportation Commission (VCTC) to plan and implement a system of bicycle lanes and multi-use trails that link the cities, unincorporated communities, schools including colleges and universities, commercial/retail, employment centers, health care service facilities, public transportation, and other points of interest.
- ▶ **Policy CTM-2.13: Transportation System Connectivity.** The County shall strive to eliminate "gaps" in roadways, bikeways, and pedestrian networks by planning for and seeking funding to construct necessary improvements to remove barriers and improve transportation system connectivity as well as connections that support first and last mile accessibility to and from public transportation.

- ▶ **Policy CTM-2.14: Bicycle Facility Design.** When designing new bicycle facilities, or modifying existing roadways with bicycle facilities, the County shall prioritize and install features to improve the safety and visibility of bicyclists.
- ▶ **Policy CTM-2.15: Bicycle/Pedestrian Design.** The County shall rely on the guidelines and design standards for bicycle and pedestrian facilities established by the California Manual on Uniform Traffic Control Devices (CAMUTCD) and supporting guidelines provided the Federal Highway Administration, Caltrans, and the American Association of State Highway and Transportation Officials (AASHTO).
- ▶ **Policy CTM-2.16: Pedestrian Planning.** The County shall consider the safety and accessibility of pedestrians when preparing transportation plans, studies, and reports
- ▶ **Policy CTM-2.17: Support Regional Bicycle Infrastructure.** The County shall support regional bicycle efforts to improve infrastructure that will make biking more attractive to residents and tourists.
- ▶ **Policy CTM-2.18: Complete Streets Standards in Existing Communities.** The County shall require discretionary development in designated Existing Communities to construct roadways to urban standards and Complete Streets principles, including curb, gutter, sidewalks, and bike lanes when there is a nexus for improvement. The County shall rely on the guidelines and design standards for Complete Streets design established by the California Manual on Uniform Traffic Control Devices (CAMUTCD), Caltrans in the Highway Design Manual, and Complete Streets Guidelines (pursuant to Deputy Directive-64-R2), Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO).
- ▶ **Policy CTM-2.19: Safety Metrics.** The County shall continue to examine and update safety metrics for California Environmental Quality Act (CEQA) impact analysis as appropriate. Options include but are not limited to: queue spill-back at intersections; mid-block unprotected crossings; and, increased crossing distances.
- ▶ **Policy CTM-2.20: Safe Pedestrian Crossings.** The County shall improve pedestrian safety at intersections and mid-block locations in Existing Communities through approved features consistent with the California Manual on Uniform Traffic Control Devices (CAMUTCD), Highway Design Manual, Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO), and the National Cooperative Highway Research Program Report 498 (Application of Pedestrian Crossing Treatments for Streets and Highways).
- ▶ **Policy CTM-2.21: Pedestrian/Bicycle Conflicts along Overweight Vehicle Corridor and Surface Transportation Assistance Act (STAA) Truck Routes.** Within Existing Communities, the County shall provide/retrofit separated or buffered pedestrian and bicycle paths from the outside travel lane along County Road Network roads that are designated Overweight Vehicle Corridors and STAA designated Terminal Access Routes. Where the application or retrofitting of separated or buffered facilities is not feasible, the County shall prioritize alternative pedestrian and bicycle connections that encourage and attract pedestrian and bicycle traffic off designated Overweight Vehicle Corridors or STAA designated truck routes.

- ▶ **Policy CTM-2.22: Funding and Maintenance for Sidewalks.** The County shall seek funding sources first for construction of new sidewalks in designated disadvantaged communities and then for sidewalk maintenance, particularly in low-income areas.
- ▶ **Policy CTM-2.23: Intercommunity and Countywide Public Transportation System.** The County shall continue to work with Ventura County Transportation Commission (VCTC), Naval Base Ventura County, and local public transportation regional bus service providers to promote the expansion of a safe, efficient, convenient, integrated, and cost-effective intercommunity and countywide public transportation and bus service that provides county residents with access to employment, commercial services, health and medical facilities, social services, educational facilities and institutions, and personal business destinations.
- ▶ **Policy CTM-2.24: Non-Drivers Living in Rural Areas.** The County shall work with Ventura County Transportation Commission (VCTC) and local public transportation providers to address the needs of non-drivers living in rural areas to provide public transportation and paratransit service.
- ▶ **Policy CTM-2.25: Amtrak Service Improvements.** The County shall support the recommendations of the California State Rail Plan for Amtrak trains, including track and signalization upgrades, increasing service frequencies by adding additional round-trip service to regional destinations north and south of Ventura County, improving passenger information and comfort, and reducing travel time.
- ▶ **Policy CTM-2.26: Abandoned Railroad Rights-of-Way.** When railroad rights-of-way are abandoned, the County shall evaluate the feasibility of acquiring the land for public use as public transportation, bicycle, pedestrian, or equestrian paths.
- ▶ **Policy CTM-2.27: Discretionary Development and Conditions of Approval to Minimize Traffic Impacts.** The County shall require that discretionary development be subject to the following permit conditions of approval, where feasible, to minimize traffic impacts by incorporating pedestrian and bicycle pathways, bicycle racks and lockers, ridesharing programs, transit improvements (bus turnouts, shelters, benches), and/or transit subsidies for employees or residents of the proposed development.
- ▶ **Policy CTM-3.1: Bicycle Network Strategy and Prioritization.** The County shall identify and prioritize components of a bicycle network to increase public access and ridership on bicycle routes.
- ▶ **Policy CTM-3.2: Inclusive Bicycle Network.** The County shall develop a bicycle network for all user types and routes across the county.
- ▶ **Policy CTM-3.3: Regional Destination Focus for Bicycle Network.** The County shall encourage the development of a bicycle network that connects to regional destinations such as parks, trails, educational institutions, employment centers, transit, park and ride lots, and tourist destinations.
- ▶ **Policy CTM-3.4: Interjurisdictional Bicycle Network Connectivity.** The County shall promote bicycle network connectivity between Ventura County communities as well as Santa Barbara and Los Angeles Counties.

- ▶ **Policy CTM-3.5: Bicycle Routes in Rural Areas.** The County shall plan for bicycle network connectivity in rural, agricultural, and open space areas in a way that supports and complements business and agricultural activities in those areas.
- ▶ **Policy CTM-3.6: Coordination with Bicycle Wayfinding Plan.** The County shall support the Complete Streets effort by, when feasible, constructing bicycle lanes on County maintained roads listed in the Ventura County Transportation Commission Bicycle Wayfinding Plan.
- ▶ **Policy CTM-3.7: Bicycle Trail along Santa Paula Branch Line.** The County shall encourage the construction of a bicycle trail along the Santa Paula Branch Line Railroad in the unincorporated area between the cities of Ventura and Santa Paula.
- ▶ **Policy CTM-3.8: Bicycle Network Routes and Wayfinding.** The County shall use clear and consistent message and placement for on- and off-street regional bikeways and to regional destinations.
- ▶ **Policy CTM-3.9: Funding for Bicycle Network and Wayfinding Planning and Improvements.** The County shall actively pursue outside funding opportunities for bicycle network improvements.
- ▶ **Policy CTM-3.10: Bicycle Storage Facilities.** The County shall require adequate bicycle storage facilities (e.g., bicycle racks, lockers) for discretionary development as determined by allowable land uses at a given site.
- ▶ **Policy CTM-4.1: Reduce Vehicle Miles Traveled (VMT).** The County shall work with Caltrans and Ventura County Transportation Commission (VCTC) to reduce VMT by:
 - facilitating the efficient use of existing transportation facilities;
 - striving to provide viable modal choices that make driving alone an option rather than a necessity;
 - supporting variable work schedules to reduce peak period VMT; and
 - providing more direct routes for pedestrians and bicyclists.
- ▶ **Policy CTM-4.2: Alternative Transportation.** The County shall encourage bicycling, walking, public transportation, and other forms of alternative transportation to reduce Vehicle Miles Traveled (VMT), traffic congestion, and GHG emissions.
- ▶ **Policy CTM-4.3: Vehicle Occupancy.** The County shall work with a broad range of agencies (e.g., Caltrans, Ventura County Transportation Commission (VCTC), Amtrak, Ventura County Air Pollution Control District, public transportation providers and shared mobility vendors) to encourage and support programs that increase vehicle occupancy including the provision of traveler information, shuttles, and preferential parking for carpools/vanpools.

- ▶ **Policy CTM-4.4: Park-and-Ride Facilities.** The County shall coordinate with Caltrans and Ventura County Transportation Commission (VCTC) to identify future park-and-ride lots within the unincorporated areas of Ventura County to facilitate more carpooling, vanpooling, and public transportation use.
- ▶ **Policy CTM-6.1: Routine Use of Alternative Transportation Options.** The County shall support the integration of emerging technologies that increase the routine use of alternative transportation options to decrease single-passenger automobile travel.
- ▶ **Policy CTM-6.3: Permeable Pavement.** As part of new roadway planning and design as part of discretionary development, the County shall promote the use of permeable paving and other passive drainage features such as bio-swales to prevent flooding, particularly in urban areas.
- ▶ **Policy CTM-6.4: Facilities for Emerging Technologies.** The County shall support the development of alternative fueling stations (e.g., electric and hydrogen) and vehicle-to-infrastructure (V2I) technology for emerging technologies.
- ▶ **Policy CTM-6.5: Electric Vehicle Charging Stations.** The County shall support the installation of electric vehicle charging stations, where feasible, at County facilities, parking lots, park-and-ride lots, truck stops, and new development.
- ▶ **Policy CTM-6.6: Neighborhood Electric Vehicles.** The County shall encourage developments and street systems that support the use of properly licensed Neighborhood Electric Vehicles where appropriate.
- ▶ **Policy CTM-6.7: Shared Mobility Operations.** The County shall encourage and support car share operators at multimodal facilities including public transportation hubs, passenger rail stations, and park-and-ride lots.
- ▶ **Policy CTM-6.8: Micro-Mobility Operations.** The County shall evaluate the feasibility and work to establish requirements for shared micro-mobility (e.g., bike sharing) vendors within unincorporated areas.
- ▶ **Policy CTM-6.9: Mobility-as-a-Service Enterprises – Vehicle Operations.** The County shall encourage Mobility-as-a-Service providers to park between service calls versus driving within unincorporated communities.
- ▶ **Policy CTM-6.10: Mobility-as-a-Service Enterprises – Support Public Transportation.** The County shall encourage Mobility-as-a-Service providers to coordinate with public transportation providers that serve unincorporated areas to increase the attractiveness of public transportation through the provision of free or subsidized public transportation patron first and last mile connections within unincorporated communities.

Implementation Programs

- ▶ **Implementation Program A: Traffic Impact Mitigation Fee Program.** The County shall update its Traffic Impact Mitigation Fee program and perform a comprehensive update to the program every five (5) years pursuant to Government Code section 66000 et seq.

- ▶ **Implementation Program B: Initial Study Assessment Guidelines.** The County shall update and adopt its' Initial Study Assessment Guidelines to address Vehicle Miles Traveled (VMT) and safety metrics pursuant to CEQA Guidelines Section 15064.3.
- ▶ **Implementation Program C: Vehicle Miles Traveled (VMT) Reduction Program.** To support climate change related goals and CEQA related VMT policies per SB 743 (2013), the County shall develop a Vehicle Miles Traveled Reduction Program.
- ▶ **Implementation Program D: Regional Road Network Coordination.** The County shall continue to coordinate across its own agencies as well as with cities in Ventura and Los Angeles Counties and Caltrans to identify needed improvements to the Regional Road Network.

This will include identification of funds available and needed for County and cities inter-city road-building purposes to construct improvements

- ▶ **Implementation Program H: Complete Streets Guidelines.** The County shall prepare and adopt Complete Streets Design Guidelines/standards to be used when constructing new roadways or improving existing roadways where Complete Streets would be appropriate/feasible. Complete Streets Design Guidelines/standards should be consistent with the pedestrian and bicycle design guidelines and design standards established by Caltrans and supporting state/federal guidelines when designing bicycle/pedestrian facilities. These include the California Manual on Uniform Traffic Control Devices (CAMUTCD), Highway Design Manual, Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO).

The County shall improve pedestrian safety at intersections and mid-block locations in developed communities by providing pedestrian crossing treatments where appropriate

- ▶ **Implementation Program I: County Road Standards Update.** The County shall update Road Standards to include the Complete Street Design Guidelines/Standards
- ▶ **Implementation Program J: Vision Zero.** The County shall develop a Vision Zero strategy for the County of Ventura with the goal of reducing all traffic fatalities and severe injuries, while increasing safe, healthy, equitable mobility for all.
- ▶ **Implementation Program K: Safe Routes to School.** The County shall support the Safe Routes to School Program by identifying opportunities to support bike and pedestrian routes to schools, identify needed improvements and opportunities to increase public access and use of these routes
- ▶ **Implementation Program L: Master Bicycle Network Plan.** The County shall develop a master bicycle network plan that includes the recommendations from the Bicycle Wayfinding Study and the prioritized list of bike lanes from the Board approved criteria
- ▶ **Implementation Program M: Bicycle Wayfinding Plan Participation.** The County shall continue to participate in and support the Ventura County Transportation Commission in updates to the Bicycle Wayfinding Plan linking all Ventura County cities, unincorporated communities, and CSUCI.

- ▶ **Implementation Program N: Storage Facilities for Shared Mobility Enterprises.** The County shall analyze the feasibility of shared micro-mobility (e.g., bike sharing) vendors being required to provide storage/parking areas or facilities to be designated and/or physically placed outside of the public right-of-way if private shared mobility vendors are allowed to operate within the unincorporated areas of the county.
- ▶ **Implementation Program O: Mobility-as-a-Service Enterprises – Parking.** The County shall consider designating parking areas in County parking facilities for Mobility-as-a-Service (MaaS) vehicles to use between customer service runs and will work with cities to provide locations as well.

Public Facilities, Services and Infrastructure Element

- ▶ **Policy PFS-1.2: Resilient Facilities and Services.** The County shall monitor the projected impacts of climate change and natural disasters to make adaptive improvements and upgrades to public facilities and services.
- ▶ **Policy PFS-1.3: Location of New Essential Public Facilities.** The County shall review plans for constructing new essential public facility, such as a hospital, health care facility, emergency shelter, emergency command center, or emergency communications facility, so that these facilities are located outside of at-risk areas whenever feasible. If such a location is infeasible, then the County shall require the use of construction methods and site design features to minimize potential damage to these facilities.
- ▶ **Policy PFS-1.10: Efficient County Operation and Maintenance.** The County shall operate and maintain County facilities in an efficient manner that meets community needs while conserving financial and natural resources.
- ▶ **Policy PFS-2.1: Sustainable Plans and Operations.** The County shall encourage energy efficiency, GHG reduction features, and resiliency planning into County facility and service plans and operations.
- ▶ **Policy PFS-2.2: Sustainable Community Facility Design.** The County shall encourage the incorporation of sustainable design features in community facilities to reduce energy demand and environmental impacts, such as reflective roofing, permeable pavement, and incorporation of shade trees.
- ▶ **Policy PFS-2.3: Energy Efficient Facility Construction, Purchases, Leases, Retrofits, and Expansions.** The County shall prioritize energy efficiency and water conservation as key design features when constructing, purchasing, leasing, retrofitting or expanding County facilities.
- ▶ **Policy PFS-2.4: Recycling Receptacles and Biodegradable/Recycled-Materials Products.** The County shall provide recycling and composting receptacles and use of biodegradable or recycled-material products at County facilities and events, where feasible.
- ▶ **Policy PFS-2.5: County Employee Trip Reduction.** The County shall encourage its employees to reduce the number and distance of single-occupancy vehicle work trips.

- ▶ **Policy PFS-2.6: County Alternative Fuel Vehicle Purchases.** The County shall review market-available technologies for alternative fuel vehicles and prioritize purchase of vehicles to reduce GHG emissions where economically feasible.
- ▶ **Policy PFS-2.8: Electric Vehicle Charging Station Infrastructure.** The County shall include electrical vehicle charging station infrastructure in new County-initiated facility construction to the extent feasible. The County shall also look for opportunities to install EV charging stations as part of any major renovation, retrofit or expansion of County facilities.
- ▶ **Policy PFS-4.4: Groundwater Resource Protection.** The County shall encourage wastewater treatment facilities to provide the maximum feasible protection and enhancement of groundwater resources.
- ▶ **Policy PFS-4.6: Reclaimed Water.** The County shall encourage public wastewater system operators to upgrade existing wastewater treatment systems to reclaim water suitable for reuse for landscaping, irrigation, and groundwater recharge.
- ▶ **Policy PFS-5.4: Solid Waste Reduction.** The County shall support and promote solid waste reduction, recycling, and composting efforts, including food waste reduction in cases where consumable food can be redistributed rather than disposed.
- ▶ **Policy PFS-5.5: Agricultural Waste Reuse.** The County shall support the beneficial reuse of agricultural wastes for activities such as composting and energy generation.
- ▶ **Policy PFS-5.6: Value-Added Alternatives to Waste Disposal.** The County shall promote value-added alternatives to solid waste management, such as compost, energy, biochar, and wood products to avoid open burning of agricultural biomass wastes.
- ▶ **Policy PFS-6.3: Climate Change Impacts on Flood Control and Drainage Facilities – Capacity.** The County shall monitor projected climate change impacts, and coordinate with local, regional, state, and federal agencies to identify existing and potential projected impacts and develop strategies to maintain and improve flood control facilities accordingly.
- ▶ **Policy PFS-6.4: Climate Change Impacts on Flood Control and Drainage Facilities – Retention.** The County shall coordinate with local, regional, state, and federal agencies to identify existing and potential infrastructure improvements to increase water retention to respond to drought conditions.
- ▶ **Policy PFS-7.2: Reduce Transmission Facility Fire Hazard Risk.** The County shall work with utility companies to modernize and upgrade transmission lines and associated equipment to reduce the risk of fire in areas with a high wildfire hazard risk.
- ▶ **Policy PFS-7.6: Smart Grid Development.** The County shall work with utility providers to implement smart grid technologies as part of new developments and infrastructure projects.
- ▶ **Policy PFS-12.4: Consistent Fire Protection Standards for New Development.** The County, in coordination with local water agencies and the Fire Protection District, shall require new discretionary development to comply with applicable standards for fire flows and fire protection.

Implementation Programs

- ▶ **Implementation Program A: Infrastructure Improvements and Funding.** The County shall prepare, adopt, and periodically update capital improvement programs for all County-owned and operated facilities and services to maintain adequate levels of service and consistency with the General Plan.
- ▶ **Implementation Program C: Climate Change Impacts Monitoring.** The County shall conduct, and periodically update, Climate Change Impacts Monitoring reports to map locations of communication, energy, public service, transportation facilities, and infrastructure that are vulnerable to rising sea levels and coastal flooding.
- ▶ **Implementation Program D: Climate Change Adaptation Response.** Based on findings from the Climate Change Impact Monitoring reports, in cases where existing County facilities are found to be vulnerable to sea-level rise or coastal flooding, the County shall identify funding and create an action plan to protect, accommodate, or manage the retreat of County facilities to areas of higher elevation or reduced flood exposure. For facilities operated by other entities, the County shall work with these entities to create an action plan to protect, accommodate, or manage the retreat of their facilities to areas of higher elevation or reduced flood exposure.
- ▶ **Implementation Program E: County Procurement Guide.** The County shall update the County's Procurement Guide to prioritize the procurement of products made from recycled materials (e.g., office products and equipment, recycled asphalt use in roads and bike paths) and for reusing or sharing equipment/resources, when feasible.
- ▶ **Implementation Program F: Trip Reduction for County Staff.** The County shall provide support for the following trip-reduction methods for County staff members:
 - carpooling/vanpooling,
 - active transportation options (e.g., pedestrian or biking),
 - use of electric or alternative energy vehicles, and
 - public transit use.

These will be accomplished through incentives, such as dedicated parking areas, electric vehicle (EV) charging stations at County facilities, carpool/vanpool coordination, and flexible work shifts.

- ▶ **Implementation Program G: Local Agency Management Program.** The County shall review and update the Local Agency Management Program plan every five years consistent with the State Water Resources Control Board Onsite Wastewater Treatment Systems Policy.
- ▶ **Implementation Program J: Public Education of Onsite Wastewater Treatment Systems Care.** The County shall promote and support programs to educate homeowners on the care and maintenance of private onsite wastewater treatment systems and environmental implications of improper maintenance.

- ▶ **Implementation Program K: Coordination on Large Onsite Wastewater Treatment Systems Repairs.** The County shall coordinate with the Los Angeles Regional Water Quality Control Board to address compliance and repair issues for large onsite wastewater treatment systems (over 5,000 gallons) and package treatment systems.
- ▶ **Implementation Program L: Food Waste Reduction.** The County shall provide educational and informational materials to restaurants, grocery stores, and other food providers, as part of food handler permitting, to support donation of safe, unused food to non-profit service agencies.

Conservation and Open Space Element

- ▶ **Policy COS-1.13: Partnerships for Protection of Natural and Biological Resource.** The County shall continue to work in partnership with agencies, organizations, and entities responsible for the protection, management, and enhancement of the county's biological resources.
- ▶ **Policy COS-2.2: Beach Nourishment.** The County shall support activities that trap or add sand through beach nourishment, dune restoration, and other adaptation strategies to enhance or create beaches in areas susceptible to sea-level rise and coastal flooding.
- ▶ **Policy COS-2.10: Saltwater Intrusion.** The County shall work with Federal, State, and local jurisdictions, agencies, and organizations to monitor saltwater intrusion and take proactive steps to reduce intrusion, including:
 - working to maintain and restore coastal wetlands buffers;
 - enhancing groundwater management to prevent excessive pumping in order to restore groundwater levels needed to reduce saltwater intrusion; and
 - implementing mitigation measures to prevent saltwater intrusion into estuaries and groundwater basins including, but not limited to, implementation of reactive barriers and use of pumps to divert saltwater.
- ▶ **Policy COS-3.2: Tree Canopy.** The County shall encourage the planting of trees and the protection of existing urban forests and native woodlands, savannahs, and tree canopy throughout the county, including along State or County designated scenic roadways and in residential and commercial zones throughout the county but especially those located within designated disadvantaged communities.
- ▶ **Policy COS-3.3: Utility Undergrounding Priority.** The County shall give overhead utility undergrounding within high fire hazard areas and Scenic Resource Areas first priority when allocating County Utility Undergrounding Funds.
- ▶ **Policy COS-5.3: Soil Productivity.** The County shall encourage landowners to participate in voluntary programs that reduce soil erosion and increase soil productivity. To this end, the County shall promote coordination between the Natural Resources Conservation Service, Ventura County Resource Conservation District, University of California Cooperative Extension, and other similar agencies and organizations.

- ▶ **Policy COS-7.2: Oil Well Distance Criteria.** The County shall require new discretionary oil wells to be located a minimum of 1,500 feet from residential dwellings and 2,500 from any school.
- ▶ **Policy COS-7.4: Electrically-Powered Equipment for Oil and Gas Exploration and Production.** The County shall require discretionary development for oil and gas exploration and production to use electrically-powered equipment from 100 percent renewable sources and cogeneration, where feasible, to reduce air pollution and GHG emissions from internal combustion engines and equipment.
- ▶ **Policy COS-7.7: Conveyance for Oil and Produced Water.** 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-8.1: Reduce Reliance on Fossil Fuels.** The County shall promote the development and use of renewable energy resources (e.g., solar, thermal, wind, tidal, bioenergy, hydroelectricity) to reduce dependency on petroleum-based energy sources.
- ▶ **Policy COS-8.2: Incentives for Energy Efficiency.** The County shall encourage the State and energy utility companies to provide programs, rebates, and incentives for energy efficiency installation and retrofit projects.
- ▶ **Policy COS-8.3: Coordinate Climate Action Plan with Cities and Organizations.** The County shall facilitate the coordination of its Climate Action Plan implementation and maintenance with the cities in the county, the Air Pollution Control District, and other organizations to promote countywide collaboration on addressing climate change.
- ▶ **Policy COS-8.4: Clean Power Alliance.** The County, as a signatory to a legal entity created under a Joint Powers Authority with neighboring communities, shall continue to serve as an active member of the Clean Power Alliance or similar organization providing local customer access to electricity generated from low carbon renewable energy sources in excess of State requirements.
- ▶ **Policy COS-8.5: Decarbonize Communitywide Electricity Supplies.** The County shall work with utility providers to offer residents options to purchase and use renewable energy resources.
- ▶ **Policy COS-8.6: Zero Net Energy and Zero Net Carbon Buildings.** The County shall support the transition to zero net energy and zero net carbon buildings, including electrification of new buildings.
- ▶ **Policy COS-8.7: Sustainable Building Practices.** The County shall promote sustainable building practices that incorporate a “whole systems” approach for design and construction that consumes less energy, water, and other non-renewable resources, such as by facilitating passive ventilation and effective use of daylight.
- ▶ **Policy COS-8.8: Renewable Energy Features in Discretionary Development.** The County shall encourage the integration of features that support the generation, transmission, efficient use, and storage of renewable energy sources in discretionary development.

- ▶ **Policy COS-8.9: Urban Tree Canopy Improvements for Energy Conservation.** The County shall encourage discretionary development to include the planting of shade trees on each property and within parking areas to reduce radiation heat production.
- ▶ **Policy COS-8.10: Battery Energy Storage Systems.** The County shall encourage battery energy storage systems as an option for optimizing the management of electricity generated by renewable resources.
- ▶ **Policy COS-8.11: Improve Energy Conservation Awareness.** The County shall encourage community members to conserve energy and reduce greenhouse gas emissions and increase awareness about energy efficiency and climate change, to conduct targeted outreach to homeowners and contractors to encourage installation of electric appliances upon routine replacement of natural gas appliances and heaters and provide information regarding financial incentives.
- ▶ **Policy COS-9.1: Open Space Preservation.** The County shall preserve natural open space resources through:
 - the concentration of development in Urban Areas and Existing Communities;
 - use of cluster or compact development techniques in discretionary development adjacent to natural open space resources;
 - maintaining large lot sizes in agricultural areas, rural and open space areas;
 - discouraging conversion of lands currently used for agricultural production or grazing;
 - limiting development in areas constrained by natural hazards; and
 - encouraging agricultural and ranching interests to maintain natural habitat in open space areas where the terrain or soil is not conducive to agricultural production or grazing.
- ▶ **Policy COS-9.3: Open Space Preservation.** The County shall place a high priority on preserving open space lands for recreation, habitat protection, wildlife movement, flood hazard management, public safety, water resource protection, and overall community benefit.
- ▶ **Policy COS-10.1: GHG Reduction Strategy.** The County shall maintain and refer to the General Plan and its integrated GHG (GHG) Reduction Strategy as the County's comprehensive plan for reducing community-wide GHG emissions in the unincorporated County.
- ▶ **Policy COS-10.2: Community Greenhouse Gas Emissions Reduction Target for 2030.** The County shall achieve a community-wide GHG emissions reduction target of 41 percent below 2015 levels by 2030.
- ▶ **Policy COS-10.3: Community Greenhouse Gas Emissions Reduction Goals for 2040 and 2050.** The County shall work towards achieving longer-term, post-2030 community-wide GHG emissions reduction goals, as follows:

- 61 percent below 2015 levels by 2040, and
 - 80 percent below 2015 levels by 2050.
- **Policy COS-10.4: Greenhouse Gas Reductions in Existing and New Development.** The County shall reduce GHG emissions in both existing and new development through a combination of measures included in the GHG Strategy, which includes new and modified regulations, financing and incentive-based programs, community outreach and education programs, partnerships with local or regional agencies, and other related actions.

Implementation Programs

- **Implementation Program C: Update Tree Protection Ordinance.** The County shall update existing Tree Protection Regulations in the Non-Coastal Zoning Ordinance to further enhance conservation of our urban forests and the preservation of the County's oak woodland resources. Updates shall include incorporation of Board-adopted recommendations from the Ventura County Oak Woodlands Management Plan (2007), which include tree replacement offsets for ministerial development projects that remove protected trees, revisiting mitigation ratios for tree removal and oak woodland impacts for discretionary development projects. The update shall also evaluate existing protections for invasive, non-native trees and consider the degree to which they provide habitat for a species during critical life stages (e.g., colonial roost sites, breeding sites, etc.). In addition, the evaluation shall also include anticipated effects of climate change on the urban forest environment.
- **Implementation Program H: County Tree Planting Program.** The County shall plant at least one thousand trees annually on County property.
- **Implementation Program I: Grants for Climate Change Adaptation Activities.** The County shall apply for grants through the California Coastal Commission and other organizations for beach nourishment, dune restoration, and other adaptation activities to improve the resilience of county beaches to sea-level rise and coastal flooding.
- **Implementation Program M: Oil and Gas Tax.** The County shall evaluate the feasibility of establishing a local tax on oil and gas operations located in the unincorporated county.
- **Implementation Program N: Sustainable Building, Siting, and Landscaping Practice Guidelines.** The County shall prepare sustainable building, siting, and landscaping practice guidelines that promote a whole systems approach to building designs and construction techniques that reduce consumption of non-renewable resources such as oil, gas and water and promote renewable energy use.
- **Implementation Program O: Assessment of Land Near Electrical Transmission and Distribution Lines.** The County shall conduct a study and prepare a publicly available assessment of suitable undeveloped lands near electrical transmission and distribution lines that serve as priority areas for the development of utility-scale solar energy generation and storage projects. If suitable locations are identified, the County shall establish a new zone, called a Renewable Energy Priority Zone, for these sites in the County's Coastal and Non-Coastal Zoning Ordinances.

- ▶ **Implementation Program P: Study to Demonstrate Energy and Greenhouse Gas (GHG) Savings.** The County shall conduct a study that demonstrates the energy and greenhouse gas (GHG) savings of the options identified in Implementation Program COS-L using modeled building prototypes. To satisfy state regulatory requirements for Energy Reach Code adoption, the study shall also demonstrate long-term cost savings of the options through a life-cycle cost analysis that considers the initial costs of efficiency improvements offset by utility bill cost savings and other relevant factors.
- ▶ **Implementation Program Q: Incentives for Development in the Renewable Energy Priority Zone.** To incentivize the development of the Renewable Energy Priority Zone sites, the County shall consider waiving permit fees and providing a reduction on the annual property tax assessment for the portion of land used for renewable energy generation or storage.
- ▶ **Implementation Program R: Performance-Based Building Code for Green Building.** The County shall update the Building Code to establish performance-based standards that incentivize green building techniques.
- ▶ **Implementation Program S: Building Code Update.** The County shall update the Building Code to include a mandatory Energy Reach Code.
- ▶ **Implementation Program T: Energy Consumption Performance.** The County shall continue to review its energy consumption performance and implement programs designed to increase energy efficiency in County-owned buildings, including, but not limited to:
 - reduced operating hours for heating, ventilating and lighting systems,
 - installation of weather stripping on all openable doors and windows,
 - development of energy audit and energy management programs,
 - implementation of operation and maintenance programs which contribute to energy conservation,
 - develop energy audits and energy management programs for all County-owned facilities,
 - develop a plan to re-invest utility company rebates and utility savings into a long-range funding program for on-going conservation projects,
 - implement operational and maintenance programs which contribute to energy conservation,
 - investigate and implement new energy technologies such as solar and fuel cells,
 - install energy management systems in all County-owned facilities to control air conditioning and lighting systems where beneficial,
 - install ceiling, wall, and roof insulation whenever feasible,
 - install plumbing flow restrictors in toilets, lavatories and showers, and
 - provide energy conservation training and literature to all County agencies.

- ▶ **Implementation Program U: Solar Canopies in Non-Residential Projects.** The County shall amend the County's Coastal and Non-Coastal Zoning Ordinances to require parking lots for new non-residential construction projects, with floor area of greater than 50,000 square feet, to include solar canopies.
- ▶ **Implementation Program W: Energy Efficiency and Conservation Program.** The County shall develop a behavior change program for energy efficiency and conservation. This program would provide energy literacy training for low-income customers on buying energy-efficient products or using energy more efficiently; develop and offer digital applications offering real-time energy use information to residents and businesses; offer anonymized data on community energy use for residents to compare performance; and provide rewards or rebates for improved energy conservation.
- ▶ **Implementation Program X: GHG Strategy Implementation.** The County shall implement the General Plan GHG Strategy through specific policies, programs, and implementing actions integrated throughout the General Plan and summarized in Appendix B.
- ▶ **Implementation Program Y: GHG Strategy Monitoring.** The County shall implement, under the overall direction of the CEO and with support of RMA, PWA, GSA, AGC, FD, and other departments as appropriate, the GHG Strategy through specific policies, programs, and implementing actions integrated throughout the General Plan and summarized in Appendix B, Climate Action Plan, as well as other appropriate actions adopted from time to time. The GHG reduction strategy shall consist of a comprehensive program to systematically reduce GHG emissions to meet adopted emission reduction targets and deadlines from all sectors – transportation, buildings, solid waste, stationary sources, agriculture, water and wastewater, and off-road equipment.
- ▶ **Implementation Program Z: Public Reporting on GHG Strategy Progress.** The County shall prepare public reports on the results of GHG Strategy implementation and monitoring and present these reports to the Board of Supervisors. The first report shall be submitted to the Board of Supervisors two years after the approval of the General Plan, after which the Board of Supervisors will determine the appropriate reporting interval. The County shall also present a more detailed progress report to the Board of Supervisors, including results of the latest GHG inventory update, every five years.
- ▶ **Implementation Program AA: GHG Inventory Updates.** The County shall update the County's GHG emissions inventory at least every five years.
- ▶ **Implementation Program BB: GHG Strategy Amendments.** The County may amend the GHG Strategy to ensure that the County is on track to achieve its 2030 target and making substantial progress towards achieving its longer-term, post-2030 goals.
- ▶ **Implementation Program CC: Climate Emergency Council.** The County shall establish a Climate Emergency Council to advise the Board of Supervisors on climate action planning and implementation of the Climate Action Plan (CAP) goals, policies, and programs.
- ▶ **Implementation Program DD: Budget and Staffing Plan for CAP Implementation.** The CEO shall, within six months from the adoption of the General Plan Update and Climate Action Plan, present to the Board of Supervisors a proposed budget and staffing plan

(including qualified technical consultants) to implement the Climate Action Plan, and shall update the budget and staffing plan each year.

- ▶ **Implementation Program EE: Streamlining GHG Analysis for Projects Consistent with the General Plan.** Projects subject to environmental review under CEQA may be eligible for tiering and streamlining the analysis of GHG emissions, pursuant to CEQA Guidelines Section 15183.5, provided they incorporate applicable GHG reduction measures included in the GHG Strategy contained in the General Plan and Program EIR. The County shall review such projects to determine whether the following criteria are met:
 - Proposed project is consistent with the current General Plan land use designation and applicable zoning designations for the project site;
 - Proposed project incorporates all applicable GHG reduction measures (as documented in Appendix B to the General Plan and analyzed in the GHG Section of the Program EIR) into project design and/or as binding and enforceable mitigation measures in the project-specific CEQA document prepared for the project; and
 - Proposed project clearly demonstrates the method, timing and process for which the project will comply with applicable GHG reduction measures and/or conditions of approval.

The County may develop more specific tiering and streamlining tools or procedures, such as a consistency review checklist, or more detailed guidance for determining consistency with the GHG Strategy.

Similarly, the County may incorporate appropriate elements of such guidance and procedures into the County's Initial Study Assessment Guidelines (ISAGs).

Hazards and Safety Element

- ▶ **Policy HAZ-1.1: Fire Prevention Design and Practices.** The County shall continue to require development to incorporate design measures that enhance fire protection in areas of high fire risk. This shall include but is not limited to incorporation of fire-resistant structural design, use of fire-resistant landscaping, and fuel modification around the perimeter of structures.
- ▶ **Policy HAZ 1.2: Defensible Space Clear Zones.** The County shall require adherence to defensible space standards, or vegetation "clear zones," for all existing and new structures in areas that are designated as Hazardous Fire Areas by the Ventura County Fire Protection District and High Fire Hazard Severity Zones by the California Department of Forestry and Fire Protection.
- ▶ **Policy HAZ-1.3: Controlled Burns and Other Fire Prevention Measures.** The County shall continue to recognize the role of fire in local ecosystems by supporting controlled burns and other fire prevention measures.
- ▶ **Policy HAZ-1.4: Development in High Fire Hazard Severity Zones and Hazardous Fire Areas.** The County shall require the recordation of a Notice of Fire Hazard with the County Recorder for all new discretionary entitlements (including subdivisions and land use permits) within areas designated as Hazardous Fire Areas by the Ventura County Fire

Department or High Fire Hazard Severity Zones by the California Department of Forestry and Fire Protection (CAL FIRE).

- ▶ **Policy HAZ-1.6: Wildfire Risk Education.** The County shall continue to develop and distribute educational materials and conduct educational outreach activities informing the public about wildfire risk and protection strategies.
- ▶ **Policy HAZ-3.1: Sea Level Rise Planning and Adaptation.** The County shall continue to actively plan for sea level rise by using the best available science to analyze critical vulnerabilities, identify measures to conserve coastal resources, minimize impacts on residents and businesses, maintain public services, and strengthen resiliency.
- ▶ **Policy HAZ-3.2: County Infrastructure Projects and Sea Level Rise.** County-initiated infrastructure projects sited along or seaward of Highway 101, such as bridges and levees, that will provide 100 years or more of service, shall be planned with the potential to be easily modified to accommodate 100-years of projected sea level rise in accordance with the H++ extreme risk aversion sea level rise scenario.
- ▶ **Policy HAZ-3.3: Sea Level Rise Educational Outreach.** To the extent feasible, the County shall incorporate education elements into coastal adaptation projects to inform the public about the risks of sea level rise and options for adaptation.
- ▶ **Policy HAZ-10.1: Air Pollutant Reduction.** The County shall strive to reduce air pollutants from stationary and mobile sources to protect human health and welfare, focusing efforts on shifting patterns and practices that contribute to the areas with the highest pollution exposures and health impacts.
- ▶ **Policy HAZ-10.5: Air Pollution Impact Mitigation Measures for Discretionary Development.** The County shall work with applicants for discretionary development projects to incorporate bike facilities, solar water heating, solar space heating, incorporation of electric appliances and equipment, the use of zero and/or near zero emission vehicles and other measures to reduce air pollution impacts and reduce GHG (GHG) emissions.
- ▶ **Policy HAZ-10.6: Transportation Control Measures Programs.** The County shall continue to work with the Ventura County Air Pollution Control District (APCD) and Ventura County Transportation Commission (VCTC) to develop and implement Transportation Control Measures (TCM) programs consistent with the APCD's Air Quality Management Program (AQMP) to facilitate public transit and alternative transportation modes within the county.
- ▶ **Policy HAZ-10.7: Fuel Efficient County Vehicles.** When purchasing new County vehicles, the County shall give strong preference to fuel efficient vehicles, including the use of zero emission vehicles when feasible.
- ▶ **Policy HAZ-10.8: Alternative Transportation Modes.** The County shall promote alternative modes of transportation that reduce single-occupancy vehicle (SOV) travel and enhance "last-mile" transportation options to improve air quality.
- ▶ **Policy HAZ-11.1: Critical Vulnerable Infrastructure.** The County shall identify and protect critical infrastructure locations that are vulnerable to damage from extreme heat.

- ▶ **Policy HAZ-11.2: Climate Change-Related Partnerships.** The County shall partner with Southern California Association of Governments (SCAG), utilities, nonprofit organizations and other entities to implement future and ongoing heat-related climate change initiatives. The County's partnership in ongoing programs and future initiatives could include helping other organizations increase participation in existing programs through education and promotion, and by using and integrating them in County programs and activities, where feasible.
- ▶ **Policy HAZ-11.3: Limit Impacts of Climate Change on Designated Disadvantaged Communities.** The County shall work with public, private, and nonprofit partners to limit impacts of climate change on Designated Disadvantaged Communities by focusing planning efforts and interventions on communities with the highest need and ensuring representatives of these communities have a role in the decision-making process for directing climate change response.
- ▶ **Policy HAZ-11.4: Education and Outreach on Effects of Climate Change.** The County shall support efforts of agencies and organizations that provide effective education and outreach to Designated Disadvantaged Communities on the effects of climate change, including increasing temperatures, wildfires, flooding, sea level rise, poor air quality, extreme weather events, disease prevention, and other public health effects.
- ▶ **Policy HAZ-11.5: Outdoor Worker Protection.** The County shall work with State and County health agencies and local organizations to provide educational programs and resources targeted at reducing the impacts of exposure to sun and heat.
- ▶ **Policy HAZ-11.6: Accessible Cooling Centers.** The County shall expand partnerships with local governments, non-government organizations, churches, and businesses to provide additional cooling centers, particularly in designated disadvantaged communities.
- ▶ **Policy HAZ-11.7: Green Building Design Features.** The County shall encourage development to include retrofits to improve building performance and market value through strategic building design features, including insulation and strategic orientation of buildings to reduce energy usage, solar-reflective white roofs, solar panels, green roofs (vegetation on roofs), and battery storage for energy.
- ▶ **Policy HAZ-11.8: Undergrounding Utilities.** The County shall work with utility providers to underground overhead power lines (both existing and as part of discretionary development) to increase the resilience of the energy grid and reduce wildfire potential, especially in Existing Communities.
- ▶ **Policy HAZ-11.9: Urban Greening.** The County shall promote the use of urban greening techniques, such as cool pavement technology, parking lot shading, landscaping, and other methods to offset climate change impacts and reduce GHG emissions for discretionary development and County-initiated projects.
- ▶ **Policy HAZ-11.10: Solar Photovoltaic Carports.** The County shall promote the use of solar photovoltaic carports for discretionary development and County initiated projects.

Implementation Programs

- ▶ **Implementation Program A: Develop and Implement Educational Programs for Wildfire Resilience.** In coordination with federal, state, and local partners (e.g., CAL FIRE), the County shall update and maintain educational programs related to such issues as:
 - Learning how to recognize the first signs of fire and take appropriate action;
 - Living with the risks of fire within the wildland/urban interface; and
 - methods of improving the resilience of homes and other structures.
- ▶ **Implementation Program B: Wildfire Vulnerability Assessment and Mapping.** In collaboration with the federal, state, and local partners (e.g., CAL FIRE), U.S. Forest Service, other agencies involved in wildfire response planning), the County shall update and map new locations that may be vulnerable to wildfire hazards including: damage to electrical, transportation, and communication infrastructure; increased rates of erosion, landslide, and water quality degradation; loss of residential, commercial, and industrial structures; and ecological disturbance.
- ▶ **Implementation Program F: Develop Climate Change Impact Assessment.** The County shall work with the Naval Base Ventura County (NBVC), other jurisdictions, the Oxnard Harbor District (OHD), California Department of Conservation, and the Department of Defense (DOD) to develop a Climate Change Impact Assessment that addresses issues related to climate change and military installations, including sea level rise, wildfires, and stormwater runoff intensities.
- ▶ **Implementation Program G: Communication Program for Property Owners At-Risk from Sea Level Rise.** The County shall seek funding to prepare and implement a communication program that periodically provides updates to the Board of Supervisors, and other stakeholders regarding impacts from sea level rise and planning decisions to address those impacts.
- ▶ **Implementation Program H: Sea Level Rise Analysis in Siting and Design of New Development.** The County shall consider the feasibility of amending the Non-Coastal Zoning Ordinance and Coastal Zoning Ordinance to require technical analysis of projected sea level rise exposure for the siting and design of new discretionary development.
- ▶ **Implementation Program I: Estuaries, Wetlands, and Groundwater Basins Resilience.** The County shall coordinate with regional stakeholders to assess vulnerabilities from the effects of, and opportunities to enhance the resiliency to, sea level rise on estuaries, wetlands, and groundwater basins. This assessment should consider factors that influence the conditions of an estuary or wetland, including sea level rise, rainfall, surface heat budget, wind, and ocean acidification.
- ▶ **Implementation Program P: Identify Critical Infrastructure Vulnerable to Extreme Heat.** The County shall map locations of county-owned facilities and infrastructure that may be vulnerable to the effects of extreme heat. When necessary, the County will develop a plan to upgrade such infrastructure to be more resilient to periods of high heat, which may include the use of heat-tolerant, reflective, or other resilient types of materials.

- ▶ **Implementation Program Q: Standards for Solar Photovoltaic (PV) Carports in County Lots.** The County shall establish standards for inclusion of solar PV carports in County-owned parking lots.
- ▶ **Implementation Program R: Adaptation Grant Funding.** The County shall apply for grant funding for climate change adaptation planning efforts from available private and public sources.
- ▶ **Implementation Program S: Extreme Heat Education and Outreach.** The County shall provide multilingual education and outreach to residents and businesses to publicize the symptoms and dangers of heat-related illness, cooling center locations, how to sign up for the Ready Ventura County VC Alert Program, worker-related protections, and practical methods for preventing heat-related illness during periods of high heat.
- ▶ **Implementation Program T: Cool Roof Ordinance.** The County shall adopt a Cool Roof Ordinance that exceeds the prescriptive cool roof requirements of the 2019 California Building Energy Efficiency Standard for Residential and Nonresidential Buildings by 25 percent (California Energy Code). Under a Cool Roof Ordinance, the County would require new construction to replace or re-coat 2,500 square feet for nonresidential and 1,250 square feet of roof space for residential buildings, or 72.5 percent or more of roofs.
- ▶ **Implementation Program U: Incentive Program for Passive Solar Home Design and Use of Green Roofs and Rooftop Gardens.** The County shall develop incentive programs to promote passive solar home design and the use of green roofs and rooftop gardens. The program shall include but may not be limited to, permit streamlining and permit fee reductions to apply passive solar home design to future residential buildings.
- ▶ **Implementation Program V: Cool Pavements Standards.** The County shall incorporate cool pavement standards into the County's development standards for County and private development projects, in both new construction and changes to existing on-site paved surface areas (e.g., parking lots, private roadways, other hardscapes).
- ▶ **Implementation Program W: Incentive Programs for Solar Photovoltaic (PV) Carports.** The County shall establish incentive programs, which may include rebate programs, permit fee reductions, and tax deductions, to incentivize the installation of solar photovoltaic (PV) carports in existing and future parking lots.

Agriculture Element

- ▶ **Policy AG-1. 1: Agricultural Land Protection and Preservation.** The County shall continue to protect and preserve agricultural land by directing growth away from productive agricultural lands into cities, unincorporated urban areas, or existing communities and by supporting the acquisition or voluntary dedication of agriculture conservation easements.
- ▶ **Policy AG-3. 2: Integrated Pest Management Practices.** The County shall encourage and support the use of Integrated Pest Management practices to reduce pesticide use and human health risks.

- ▶ **Policy AG-3. 3: Public Education for Agricultural Products and Integrated Pest Management.** The County shall collaborate with the agricultural community to provide information on Integrated Pest Management and agricultural products and practices in Ventura County.
- ▶ **Policy AG-4. 1: Connections to Local Produce.** The County shall strive to enhance access to and consumption of fresh, local produce by encouraging direct connections between local farmers/ranchers and markets, restaurants, institutions, schools, hospitals, food banks, and other businesses.
- ▶ **Policy AG-4. 3: Technological Innovation.** The County shall encourage the use of technology that supports agricultural production, while enhancing environmental sustainability and natural resource conservation.
- ▶ **Policy AG-4. 4: Pest Management.** The County shall continue to monitor leading research findings on methods and technologies for reducing harm to the agricultural sector from invasive plants, pests, and diseases and modify and expand agricultural practices when appropriate and feasible.
- ▶ **Policy AG-5. 1: Inorganic Nitrogen Based Fertilizers.** The County shall encourage farmers to reduce fertilizer application and transition to products that reduce or avoid nitrous oxide emissions, such as organic composting and enhanced efficiency fertilizers.
- ▶ **Policy AG-5. 2: Electric- or Renewable-Powered Agricultural Equipment.** The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment, when feasible.
- ▶ **Policy AG-5. 3: Electric- or Renewable- Powered Irrigation Pumps.** The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar-power, and encourage electric utilities to eliminate or reduce stand-by charges.
- ▶ **Policy AG-5. 4: Alternative Irrigation Techniques.** The County shall encourage farmers to continue and enhance the water-saving irrigation techniques designed to reduce water consumption.
- ▶ **Policy AG-5. 5: Carbon Farming Practices.** The County shall encourage and support the efforts of resource conservation districts, farmers, and other stakeholders to expand carbon farming practices, such as reduced tilling, cover-cropping, composting, biochar, and other activities that both reduce GHG emissions and increase carbon sequestration and storage, when feasible.
- ▶ **Policy AG-6. 1: Monitor Climate Change Research.** The County shall support and monitor research on the effects of a changing climate on the agricultural industry within Ventura County.
- ▶ **Policy AG-6. 2: Crop Resiliency.** The County shall engage the agricultural sector to understand the tolerance of current crop mixes to withstand the impacts of climate change, including increased temperatures, disease, and pests, and explore options to diversify crops.

Implementation Programs

- ▶ **Implementation Program B: Regionally-Grown Products Sales Incentives.** The County shall develop a program that encourages sales and distribution of regionally-grown (in Ventura County or neighboring counties of Los Angeles, Santa Barbara, or Kern) produce to local retailers, restaurants, and markets, and encourage chain stores to develop local distribution centers. The program will encourage residents to select locally grown food products for freshness, local economic development benefits, and reduced GHG emissions.
- ▶ **Implementation Program C: County Procurement.** The County shall develop a program to identify opportunities to continue to provide organic and locally grown foods into cafeteria services, the jail, Ventura County Medical Center, and other County-sponsored services and events that provide food service, to the extent feasible.
- ▶ **Implementation Program D: Agricultural Tourism Development Standards.** The County shall revise the Non-Coastal Zoning Ordinance to include regulations and development standards for agricultural tourism while protecting both the grower and the public. Ordinance revisions may also include additional development standards for agricultural promotional uses, if necessary.
- ▶ **Implementation Program E: Specialty Farming Education.** The County shall continue to collaborate with and support the UC Cooperative Extension Office on education programs that inform and assist local farmers, ranchers, and agricultural managers in diversifying and establishing expertise in specialty agricultural products.
- ▶ **Implementation Program F: Enhanced Access to Locally Grown Products.** The County shall conduct a study to identify barriers to local farm stands and take action to remove these barriers as part of the next update to the Non-Coastal Zoning Ordinance.
- ▶ **Implementation Program G: Farm-to-Front Door.** The County shall study the feasibility of encouraging “Farm-to-Front Door” business model and its potential benefits to businesses and residents in Ventura County.
- ▶ **Implementation Program H: Nutrient Management Plans.** The County shall continue to collaborate with the UC Cooperative Extension Office and UC Agriculture and Natural Resources to implement Nutrient Management Plans for commonly grown local crops featuring best management practices for nitrous oxide emission reductions.
- ▶ **Implementation Program I: Fossil Fuel-Powered Equipment Replacement.** The County shall coordinate with the Air Pollution Control District and electric utilities to develop a program to establish a countywide fossil fuel-powered equipment conversion target, track progress on conversions to renewable energy sourced electric powered systems and provide technical assistance to users considering replacement of pumps.
- ▶ **Implementation Program J: Alternative Fuel Funding for Agricultural Operations.** The County shall coordinate with the Air Pollution Control District to develop a program to identify funding sources or develop financial or regulatory incentives to encourage the switch to electric or alternatively fueled agricultural equipment, when feasible.

- ▶ **Implementation Program K: Water-Saving Irrigation Techniques Program.** The County shall continue to collaborate with and support the UC Cooperative Extension Office on educational programs on irrigation techniques to maximize water use efficiency, when feasible.
- ▶ **Implementation Program L: Encourage and Facilitate Carbon Farming.** The County shall develop a program to encourage and facilitate carbon farming projects, including development of demonstration projects and site-specific carbon farm plans, to guide implementation of carbon farming practices throughout the county, when feasible.
- ▶ **Implementation Program M: Biogas Control Systems.** The County shall review and update regulations to allow the development of appropriate biogas facilities near the source of organic waste materials and develop a program to coordinate public-private local investment in biogas control systems to encourage their development.
- ▶ **Implementation Program N: Research on Effects of Climate Change.** The County shall research the potential effects of climate change on the county's existing agricultural industry as well as the resulting challenges and opportunities associated with these changes. Research partners may include the California Climate and Agriculture Network (CalCAN), University of California Cooperative Extension, Ventura County Farm Bureau, and the Agricultural Commissioner's Office. The research shall address, but may not be limited to, loss of chill hours, increased populations of or new species of pests, higher rates of evapotranspiration, and opportunities created by warmer climate to grow crops that were previously unsuitable based on historic climate conditions.
- ▶ **Implementation Program O: Subsidies for Resilient Crop Production.** The County should encourage programs and obtains grants to seek funding to subsidize efforts to breed crops that are resilient to high heat, shade crops and installation of light reflectors, and reduce rates of tilling to promote soil health and combat increased temperatures as recommended by federal, state, and local agencies.

Water Resources Element

- ▶ **Policy WR-3.1: Non-Potable Water Use.** The County shall encourage the use of non-potable water, such as tertiary treated wastewater and household graywater, for industrial, agricultural, environmental, and landscaping needs consistent with appropriate regulations.
- ▶ **Policy WR-3.2: Water Use Efficiency for Discretionary Development.** The County shall require the use of water conservation techniques for discretionary development, as appropriate. Such techniques include low-flow plumbing fixtures in new construction that meet or exceed the state Plumbing Code, use of graywater or reclaimed water for landscaping, retention of stormwater runoff for direct use and/or groundwater recharge, and landscape water efficiency standards that meet or exceed the standards in the California Model Water Efficiency Landscape Ordinance.
- ▶ **Policy WR-3.3: Low-Impact Development.** The County shall require discretionary development to incorporate low impact development design features and best management practices, including integration of stormwater capture facilities, consistent with County's Stormwater Permit.

- ▶ **Policy WR-3.4: Reduce Potable Water Use.** The County shall strive for efficient use of potable water in County buildings and facilities through conservation measures, and technological advancements.
- ▶ **Policy WR-4.1: Groundwater Management.** The County shall work with water suppliers, water users, groundwater management agencies, and groundwater sustainability agencies to implement the Sustainable Groundwater Management Act (SGMA) and manage groundwater resources within the sustainable yield of each basin to ensure that county residents, businesses, agriculture, government, and the environment have reliable, high-quality groundwater to serve existing and planned land uses during prolonged drought years.
- ▶ **Policy WR-4.3: Groundwater Recharge Projects.** The County shall support groundwater recharge projects and multi-benefit consistent with the Sustainable Groundwater Management Act and the Integrated Regional Water Management Plan to ensure the long-term sustainability of groundwater.
- ▶ **Policy WR-4.4: In-Stream and Recycled Water Use for Groundwater Recharge.** The County shall encourage the use of in-stream water flow and recycled water for groundwater recharge while balancing the needs of urban and agricultural uses, and healthy ecosystems, including in-stream waterflows needed for endangered species protection.
- ▶ **Policy WR-6.1: Water for Agricultural Uses.** The County should support the appropriate agencies in their efforts to effectively manage and enhance water quantity and quality to ensure long-term, adequate availability of high quality and economically viable water for agricultural uses, consistent with water use efficiency programs.
- ▶ **Policy WR-6.2: Agricultural Water Efficiency.** The County should support programs designed to increase agricultural water use efficiency and secure long-term water supplies for agriculture.
- ▶ **Policy WR-6.3: Reclaimed Water Use.** The County should encourage the use of reclaimed irrigation water and treated urban wastewater for agricultural irrigation in accordance with federal and state requirements in order to conserve untreated groundwater and potable water supplies.

Implementation Programs

- ▶ **Implementation Program C: Regional Collaboration on Water issues and Sustainability.** The County shall continue to provide data and staff resources to support collaboration on climate change and sustainability, and for planning and implementing projects that address local and regional water issues.
- ▶ **Implementation Program E: Well Guidelines Update.** The County shall coordinate with the local groundwater management agencies and local groundwater sustainability agencies to update County of Ventura Ordinance 4468 and related guidelines on the location, construction, and abandonment of water wells, if necessary.
- ▶ **Implementation Program F: Discretionary Development Review for Adequate Water and Wastewater.** The County shall verify that all discretionary development proposals demonstrate an adequate long-term supply of water, adequate methods for sewage disposal, provide adequate drainage to avoid flooding, prevent erosion, and prevent contamination of local water.

- ▶ **Implementation Program G: Water Conservation.** The County shall work with the state and local water suppliers to educate County residents and offer incentives for water conservation features, including drought-tolerant landscaping, removal of turf, graywater, and water-saving plumbing technologies.
- ▶ **Implementation Program H: County Water Efficiency.** The County shall review water usage at County-owned facilities and from County operations and develop recommendations for water saving practices and facility improvements, including turf removal to conserve water.

Economic Vitality Element

- ▶ **Policy EV-4.4: Renewable Energy Facilities.** The County shall identify appropriate locations to allow for development of renewable energy generation and storage facilities and encourage the development of innovative approaches to renewable energy deployment, including solar power, wind power, wave energy, distributed power systems and micro-grids, and other appropriate renewable sources and storage and distribution systems.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.8-1: Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and one dwelling unit per parcel. Other uses include uses such as composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres.

Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

Future development that would be accommodated by the 2040 General Plan, as described above, would result in construction and operation-related GHG emissions that contribute to climate change on a cumulative basis. Detailed construction information for individual projects is unknown at this time, but would typically involve the use of heavy-duty equipment, construction worker commute trips, material deliveries, and vendor trips. These activities would result in GHG emissions limited in duration for any given project, but when taken together over buildout of the 2040 General Plan, could be considerable. Long-term operational sources of GHG emissions associated with the 2040 General Plan would include mobile sources (e.g., vehicle exhaust), energy consumption (e.g., electricity and natural gas), solid waste (e.g., emissions that would occur at a landfill associated with solid waste decomposition), wastewater treatment, and water consumption (e.g., electricity used to deliver and treat water consumed by customers in the plan area). Because GHG emissions from vehicles are one of the largest sources of GHG emissions in the plan area (36 percent), VMT is an important metric to help measure progress toward reducing GHG emissions. Growth assumptions relied upon for the GHG emissions projections are presented in Table 4.8-4.

Table 4.8-4 Population, Employment, Housing, and Vehicle Miles Traveled in Unincorporated Ventura County, 2015 through 2040

	2015	2020	2030	2040
Population	97,733	99,755	100,918	101,832
Employment	32,889	32,988	34,556	35,875
Housing	32,191	32,446	32,959	33,472
VMT	1,807,658,790	1,837,739,017	1,897,899,472	1,958,059,926
VMT-per Capita	18,495	18,423	18,806	19,228

Under the business-as-usual scenario adjusted for federal and State climate and energy legislation, as described above in the methodology subsection, GHG emissions in unincorporated Ventura County are projected to decrease from 1,793,971 MT CO₂e in 2020 to 1,540,630 MT CO₂e in 2040, a decrease of 253,341 MT CO₂e or 14 percent (as shown in Table 4.8-2). Between 2015 and 2040, GHG emissions are projected to decrease from 1,897,112 MT CO₂e to 1,540,630 MT CO₂e, a decrease of or 356,482 MT CO₂e or 19 percent.

These GHG reductions are due to State and federal implementation of legislation with local benefits, such as increases to the pace and scale of renewable energy generation replacing fossil-fuel power plants in compliance with RPS mandates, local implementation of actions associated with CARB's Short-Lived Climate Pollutant Strategy, and improvements to the fuel economy of new motor vehicles resulting from implementation of the State's Advanced Clean Cars Program. While these regulations result in meaningful GHG reductions at the local level, additional actions, local or otherwise, would be needed to meet the GHG 2030 reduction target of 41 percent below 2015 levels by 2030, as identified in the 2040 General Plan under Policy COS-10.2.

To achieve these additional GHG reductions through local action, the 2040 General Plan includes 118 policies and 45 implementation programs that are intended to regulate activities contributing to GHG emissions in the county. These policies and programs regulate new development and/or existing activities, infrastructure, and facilities contributing to GHG emissions. Some of the policies addressing GHG emissions have been carried over from the Area Plans as described in Appendix B, Table B-10 of the 2040 General Plan. Of the CAP components, 46 policies and 31 implementation programs would have both GHG reduction and climate change adaptation co-benefits. Some degree of GHG reduction can be anticipated from these policies and implementation programs due to the reduction or modification of GHG-generating activities occurring countywide. These changes occur directly through the implementation of programs or through policies which provide a pathway for future discretionary development to occur with less GHG emissions than would likely occur under existing conditions. The policies and implementation programs contained within the 2040 General Plan are designed to reduce consumption patterns or transition consumption to resources that produce less CO₂e. The efficacy of these policies and programs is additionally supported by the examples of local actions that can be used to achieve the State's climate goals provided by CARB in Appendix B of the 2017 Scoping Plan (CARB 2017).

The actual benefit accrued for many of these policies and implementation programs cannot be quantified at this time and in advance of 2040 General Plan adoption because data are not available or the degree to which residences and businesses are likely to participate is unknown. Many of the policies and programs are designed to encourage, promote or support the public with performing certain actions because the County does not have the regulatory authority to require individuals to comply. The quantified measures shown in Table 4.8-5 are exceptions, where data on consumption and participation rates are available to estimate the GHG reductions associated with implementation of the actions by 2030.

Table 4.8-5 summarizes the policies and programs that would have quantifiable GHG reductions by 2030, and the assumptions made for estimating these GHG emissions reductions. However, as stated above, other policies and implementation programs would result in GHG reductions, but the specific amount cannot be determined at this time and would be speculative.

Table 4.8-5 Quantified GHG Reductions

Program / Policy	2030 GHG Reductions – MT CO₂e	Assumptions
AG-H: Nutrient Management Plans	33,830	Replace inorganic nitrogen fertilizer with organic fertilizer from locally sourced organic waste – 25 percent replacement by 2030.
COS-8.4: Clean Power Alliance	59,972	Community Choice Aggregation Program increases enrollment in Green Choice Program (100 percent renewable electricity) to 95 percent of all residential and commercial customers by 2030.
COS-H: County Tree Planting Program	354	Tree planting program, 1,000 annually for 10,000 new trees by 2030.
COS-S: Building Code Update	2,019	Enhance energy efficiency of new residential and commercial construction and major retrofits over standard Title 24 building code. All new residential construction all-electric by 2030 with solar photovoltaic panels sized to offset annual electricity demand.
COS-W: Energy Efficiency and Conservation Program	5,042	Behavior change energy efficiency program results in residential energy savings; 5 percent reduction in commercial building energy use.

Program / Policy	2030 GHG Reductions – MT CO ₂ e	Assumptions
CTM-B: Initial Study Assessment Guidelines	5,042	15 percent VMT reduction from new development (relative to a 2030 business as usual scenario) through incorporation of VMT thresholds into the ISAG pursuant to SB 743 implementation.
CTM-C: Vehicle Miles Traveled (VMT) Reduction Program	47,231	After accounting for the 15 percent VMT reduction from new development per CTM-B, this measure would achieve an additional 5 percent overall reduction in VMT by 2030, and 10 percent by 2040 (relative to 2030 and 2040 business as usual scenarios, respectively).
Total	151,903	

Implementation of the quantified policies and programs in Table 4.8-5 would collectively provide reductions of 151,903 MTCO₂e by 2030, an approximate 9 percent reduction from forecast 2030 levels and 30 percent of the reductions needed to meet a target of 1,113,972 MT CO₂e for consistency with emissions targets identified in Policy COS-10.2 (41 percent below 2015 levels by 2030). An additional 361,250MT CO₂e of reductions would be needed to close the gap with the 2030 target.

The 2040 General Plan's policies and programs contained in Table 4.8-6 provide qualitative GHG reduction benefits consistent with Section 15064.4 of the State CEQA Guidelines, which states that lead agencies may describe or estimate the amount of GHG resulting from a project based on qualitative analyses or performance-based standards at the agency's discretion. The aggregate GHG reduction benefits of qualitative and quantitative measures can be evaluated, and adjusted if needed in future years through the implementation and monitoring actions described in Program COS-Y, Program COS-BB, and Policy LU-22.2. This approach is in line with the State CEQA Guidelines, Section 15183.5, which explains in part that a GHG reduction plan's performance should be monitored and amendments should be made as necessary if specified levels of GHG reduction are not being achieved.

Table 4.8-6 provides an overview of 2040 General Plan programs that would result in additional GHG emissions reductions, and achieve additional progress toward meeting the 2030 GHG reduction target. This table also explains how these programs would result in GHG emissions reductions.

Table 4.8-6 CAP Programs with Qualitative GHG Reduction Benefits by Sector

Program ID	GHG-Emitting Sector							Analysis of Program's GHG Reduction Potential
	Agriculture	Building Energy	Off-Road	Waste	Stationary Sources	Transportation	Water	
AG-B	X					X		Reduce VMT by substituting food transported from outside of the county with locally produced food.
AG-C	X					X		Reduce VMT by substituting food transported from outside of the county with locally produced food. Organic growing techniques reduce the use of inorganic fertilizer with higher GHG emissions.
AG-E	X							Encourage farmers to adopt organic growing techniques.

Program ID	GHG-Emitting Sector							Analysis of Program's GHG Reduction Potential
	Agriculture	Building Energy	Off-Road	Waste	Stationary Sources	Transportation	Water	
AG-G	X							Feasibility study should also include an assessment of GHG emissions associated with the local distribution of products to individual households.
AG-I	X		X				X	Transition farm equipment to electrically powered equipment. Convert diesel-consuming water pumps to solar powered pumps.
AG-J	X						X	Transition farm equipment to electrically powered equipment. Convert diesel-consuming water pumps to solar powered pumps.
AG-K	X						X	Reduce the amount of water that needs to be treated, pumped and conveyed, which requires the use of energy.
AG-L	X			X				Encourage the capture and storage of concentrated carbon in soils from farm waste and woody biomass; practices, improve soil health and reduce the need to apply inorganic fertilizers.
COS-C	X	X		X				Improve the energy efficiency of buildings by reducing heat transfer into buildings and urban heat island effects. Preserving trees aids sequestration of carbon dioxide. Limits the disposal of woody biomass in landfills.
COS-H	X	X						Improve the energy efficiency of buildings by reducing heat transfer into buildings and urban heat island effects. Planting trees aids sequestration of carbon dioxide.
COS-M					X			Increased taxes on oil and gas facilities may reduce oil and gas production, and GHG emissions associated with the process.
COS-N		X					X	Increase the energy efficiency of buildings and using building products derived from recycled materials.
COS-O		X						Establish zones for the development of utility-scale renewable energy facilities.
COS-P		X						Study can be used to show GHG reduction benefits, cost-effectiveness, and energy savings potential of reach codes. These analyses are needed for adopting an Energy Reach Code.
COS-Q		X						Reduce costs for renewable energy development to expand local capacities for zero-carbon electricity generation.
COS-R		X						Enhance energy efficiency of new residential and commercial construction and major retrofits over standard Title 24 building code.
COS-S		X						Adopt a reach code that supports the construction of all-electric new residential buildings with consumption offset by solar photovoltaic panels.
COS-T		X						Reduce GHG emissions by reducing energy demand by improving the energy efficiency of county owned buildings.
COS-U		X						Expand local capacity for zero-carbon electricity generation.
CTM-A						X		Establish fees that encourage projects to be designed to minimize traffic impacts, specifically VMT reduction. Invest revenues generated from program into improvement projects that reduce VMT and associated consumption of fossil fuels from on-road vehicle use.
CTM-I						X		Complete Street Guidelines and Standards improve the safety and functionality of pedestrian and cycling infrastructure, encouraging residents to use alternative modes of transportation, replacing trips made by motor vehicles requiring the combustion of GHG emitting fossil fuels.

Program ID	GHG-Emitting Sector							Analysis of Program's GHG Reduction Potential
	Agriculture	Building Energy	Off-Road	Waste	Stationary Sources	Transportation	Water	
CTM-J						X		The Vision Zero initiative is intended to result in safer roadways and cycling infrastructure, to increase the appeal and participation in modes of transportation with zero carbon emissions as an alternative to motor vehicle use.
CTM-K						X		The Safe Routes to School programs is intended to result in safer roadways and cycling infrastructure, to increase the appeal and participation in modes of transportation with zero carbon emissions as an alternative to motor vehicle use.
CTM-L						X		The Master Bicycle Network plan is designed to expand the network of cycling lanes to important infrastructure and encourage modes of transportation with zero carbon emissions as an alternative to motor vehicle use.
CTM-M						X		The Bicycle Wayfinding Plan is designed to expand cycling infrastructure to neighboring communities and reduce VMT-related GHG emissions that occur as a result of trips between the unincorporated county and neighboring jurisdictions.
CTM-N						X		Provide micro-mobility options that encourage alternative modes of transportation by resolving the "last-mile" dilemma, which is a barrier to widespread use of public transportation and perpetuation of motor vehicles a preferred transportation mode.
CTM-O						X		Requires the county to prepare required feasibility studies for the adoption of energy reach codes, which reduce GHG emissions through energy efficiency and fuel substitution in newly constructed buildings.
HAZ-Q		X				X		Expand local capacity for zero-carbon electricity generation.
HAZ-T		X						Enhance energy efficiency of new residential and commercial construction and major retrofits over standard Title 24 building code.
HAZ-U		X						Enhance energy efficiency of new residential and commercial construction and major retrofits over standard Title 24 building code.
HAZ-V		X						Enhance energy efficiency of new residential and commercial construction and major retrofits over standard Title 24 building code.
HAZ-W		X						Expand local capacity for zero-carbon electricity generation.
LU-A		X				X		Improve the energy efficiency of buildings by promoting compact, multi-family housing. Improved energy efficiency reduces the consumption of fossil fuels which are combusted on-site using natural gas and propane, or to create electricity supplied via electrical grid. Limiting sprawl can also support GHG reductions by requiring less driving between destinations, thus reducing VMT and the fuel consumption associated with on-road transportation.
PFS-A		X				X		Requires the county to update capital improvement programs to include measures to reduce GHG emissions, in conformance the adopted programs and policies included in the General Plan targeting publicly owned facilities, including PFS-E, PFS-F, PFS-G, PFS-J, PFS-K, PFS-L, PFS-1.10, PFS-2.1, PFS-2.2, PFS-2.3, PFS-2.4, PFS-2.5, PFS-2.6, PFS-2.8, PFS-5.4, PFS-5.5, PFS-5.6, PFS-7.6, PFS-12.4.

Program ID	GHG-Emitting Sector							Analysis of Program's GHG Reduction Potential
	Agriculture	Building Energy	Off-Road	Waste	Stationary Sources	Transportation	Water	
PFS-E				X				By requiring the use of recycled materials in procurement purchases, the County is supporting the diversion of materials away from landfills where GHG emissions may be released as waste decomposes. Procurement of recycled materials also reduces the energy and water associated with manufacturing new goods from raw materials.
PFS-F		X				X		Reduce reliance on fossil fuels for transportation by providing electric vehicle charging at county facilities, supplementing vehicle fleets with electric vehicles, and encouraging employees to use alternative modes of transportation.
PFS-G							X	CAP implementation and updates in conformance with CEQA Guidelines Section 15183.5.
PFS-J							X	Reduce fugitive GHGs occurring from improperly functioning wastewater treatment systems at homes.
PFS-K							X	Reduce fugitive GHGs occurring from improperly functioning industrial-scale wastewater treatment systems.
PFS-L				X				Divert organic waste from landfills, where they decay over time and create methane emissions. Supplements waste recovery efforts of SB 1383 Statewide Organic Waste Diversion Program.
WR-C	X							Provisioning of water data and participation in stakeholder collaboration has been identified as an important component of achieving water conservation and sustainability goals (Cantor et. al 2018).
WR-G							X	Reduce the amount of water that needs to be treated, pumped and conveyed which requires the use of energy.
WR-H							X	Reduce the amount of water that needs to be treated, pumped and conveyed which requires the use of energy.

As shown in Table 4.8-6, each of the GHG-emitting sectors is addressed by implementation programs that target the activities within those sectors that result in GHGs.

For the agricultural sector, Implementation Programs AG-E and AG-H would be implemented to promote organic growing techniques that reduce reliance on inorganic fertilizers, which contain volatile nitrogen compounds that are potent GHGs, represented as nitrous oxides in the County's GHG accounting. Implementation Programs AG-B, AG-C, AG-G, AG-I, AG-K, and AG-J would reduce GHG emissions by targeting the GHG emissions associated with the hauling and production of food. Encouraging the local consumption of locally produced foods, as an alternative to foods that are shipped from other parts of the State, country, or from international sources can reduce the distance food products travel to reach the consumer, which translates into a decrease in GHG emissions (Weber and Matthews 2009). The use of electric-powered equipment for farming can reduce the use of fossil fuels from heavy-duty off-road equipment and from water pumping associated with crop production. Carbon sequestration is also present in Implementation Program AG-L, which directs the County to develop a carbon farming pilot program to capture and store concentrated carbon in soils, with the added benefit of improving soil health (Kane 2015, Marin Carbon Project 2018).

Programs to reduce GHG emissions from the Building Energy sector include guidelines and requirements for green building techniques in new construction in Implementation Programs COS-N, COS-R, HAZ-T, HAZ-U, and HAZ-V; landscaping to promote energy efficiency in Implementation Programs COS-C and COS-H; energy conservation programs for existing buildings through behavior modification and retrofitting in Implementation Programs COS-W; and energy reach codes in Implementation Programs COS-S and COS-P, which provide the requisite analyses for adopting the zero net energy and zero carbon building reach code as specified in Policy COS-8.6. Programs are also in place to increase local capacity for renewable energy for both utility-scale and distributed generation under Implementation Programs COS-O, COS-Q, COS-U, and HAZ-W. The increased production of renewable energy reduces the carbon intensity of electricity consumed by buildings.

The green building and retrofitting programs (Implementation Programs COS-N, COS-R, and COS-W) do not mention applicability to industrial buildings, though the GHG benefits of energy conservation applied through these programs to residential and commercial buildings, could be applied to industrial as well. Under Implementation Program COS-L, the County would evaluate the feasibility of an excise tax on oil and gas operations, which would be intended to partially fund the County's response to climate change impacts. These taxes would presumably be in addition to fees already collected by the County for these activities. Before an oil excise tax could be levied, it would need to be approved by both the Board of Supervisors and at least a majority vote of the electorate.

GHG emissions from on-road transportation are addressed by Implementation Programs CTM-B and CTM-C, which are designed to reduce new and existing VMT resulting from forecast growth that would be accommodated by the 2040 General Plan, as well as reductions to baseline VMT from the levels identified in the 2015 GHG Inventory. Encouraging alternative modes of transportation, with an emphasis on walking and cycling, are the focus of achieving GHG reductions under Implementation Programs CTM-A, CTM-I, CTM-J, CTM-K, CTM-L, CMT-M and CTM-O.

Programs supporting GHG reduction in the water sector are targeted at efficiency improvements and fuel substitution for water pumping and conveyance in the agricultural sector through Implementation Programs AG-I, AG-J, and AG-K. Water conservation in new construction is addressed through the "whole systems" approach to sustainable building practices promoted under Implementation Program COS-N and increased use of non-potable water for irrigation through Implementation Program WR-G. Improvements to the efficiency of wastewater treatment systems are addressed in Implementation Programs PFS-G, PFS-G, and PFS-K, which would reduce GHGs by reducing the intensive energy demands and methane emissions associated with these processes.

In addition to the programs described in Table 4.8-6, the 2040 General Plan also includes policies and programs to reduce wildfire hazards through Implementation Programs HAZ-A and HAZ-B. These programs are intended to protect assets, populations, and wildlife while reducing the future risk of catastrophic fires. Although wildfires are not included in the County's 2015 GHG inventory because a standard accounting protocol is not available and wildfires occur intermittently rather than year-to-year, they have been estimated to cause substantial GHG emissions in years when they do occur. The 2017 Thomas Fire, which covered large portions of the unincorporated County, was estimated to release 3.6 million metric tons of carbon dioxide into the atmosphere (Anderson 2018), double the 1.79 million metric tons CO_{2e} that are forecast to be generated from all major emissions sources in the County in 2020.

Thus, the prevention of wildfires, as addressed within the 2040 General Plan, can play a key role in minimizing future GHG emissions occurring within the county.

The planting of new trees under Implementation Program COS-H also has an important role in mitigating GHG emissions. This measure specifies the planting of 20,000 new trees on County-owned properties by 2040, which can reduce GHG emissions by increasing the energy efficiency of buildings (McPherson 1999) and has the potential to mitigate local GHG emissions by sequestering CO₂ from the atmosphere (USFS 2019).

While the programs included in the 2040 General Plan cover each of the sectors contributing to GHG emissions in the County, not all of the policies intended for GHG reduction have associated programs that would put these policies into action. Of the 118 policies identified for GHG reduction, 52 are not linked to an implementation program, as shown in Table 4.8-7.

Table 4.8-7 GHG-Reducing Policies Not Associated with Implementation Programs

GP Policy Element	Policy
Land Use	LU-11.3, LU-11.4, LU-16.5, LU-16.9, LU-18.5
Circulation, Transportation	CTM-2.5, CTM-2.6, CTM-2.7, CTM-2.8, 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, CTM-6.4, CTM-6.5, CTM-6.6, CTM-6.7
Public Facilities	PFS-1.10, PFS-2.2, PFS-2.3, PFS-2.6, PFS-5.5, PFS-5.6, PFS-6.4, PFS-7.2, PFS-7.6, PFS-12.4
Conservation	COS-1.13, COS-2.10, COS-3.3, COS-5.3, COS-7.2, COS-7.4, COS-7.8, COS-8.2, COS-8.3, COS-8.4, COS-8.10, COS-9.1, COS-9.3
Hazard	HAZ-10.1, HAZ-1.3, HAZ-1.4, HAZ-10.1, HAZ-10.5, HAZ-10.6, HAZ-10.7, HAZ-10.8, HAZ-11.9
Agriculture	AG-1.1, AG-3.2, AG-4.3, AG-4.4
Water	WR-4.4, WR-6.1, WR-6.2, WR-6.3
Economic Vitality	EV-4.4

Programs are necessary for estimating targeted GHG reductions for 2030 and beyond, because the programs provide steps that County staff would take to implement a policy and realize the reduction potential. Many of the policies identified would support GHG reduction measures as part of future development under the 2040 General Plan but would not, on their own, specify the detailed steps that would be needed to achieve GHG reduction. Though these policies do not have implementation programs associated with them, they are still appropriate for inclusion in the 2040 General Plan, which is a programmatic document intended to provide general guidance to local decision makers for future actions. As a result, the policies, while supportive of future GHG reduction measures, do not contain enough specificity for their numeric contribution to the established 2030 and 2040 targets to be quantified. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure GHG-1: New Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development

To support the proposed reach codes under COS-S, the 2040 General Plan shall include a new program in the Hazards and Safety element that prohibits the installation of new natural gas infrastructure in new residential construction through amendments to the Ventura County Building Code. This program shall also be extended to include commercial building types such as offices, retail buildings, and hotels where the use of natural gas is not critical to business operations and contain appliances that can be feasibility substituted with electricity powered equivalents.

Mitigation Measure GHG-2: New Implementation Program HAZ-X: Building Energy Saving Ordinance for Industrial Buildings

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program HAZ-X: Building Energy Saving Ordinance for Industrial Buildings

To address GHG emissions associated with electricity consumption by industrial buildings, which were not quantified in the GHG Inventory and Forecasting due to utility privacy rules, the County shall implement a program to adopt a Building Energy Saving Ordinance for industrial buildings over 25,000 square feet in size, modeled after the local benchmarking ordinances adopted in other local jurisdictions in California (CEC 2019). The County shall prepare reports showing the energy performance of industrial buildings relative to similar buildings in California and the United States and make these reports available to the public by request. The County, through their building department shall provide recommendations on energy efficiency retrofits and green building strategies to improve energy performance to property owners and tenants subject to the reporting requirements.

Mitigation Measure GHG-3: Do Not Include Implementation Program COS-EE in the 2040 General Plan

The County shall not include Implementation Program COS-EE in the 2040 General Plan.

► ~~**Implementation Program COS-EE: Streamlining GHG Analysis for Projects Consistent with the General Plan.** Projects subject to environmental review under CEQA may be eligible for tiering and streamlining the analysis of GHG emissions, pursuant to CEQA Guidelines Section 15183.5, provided they incorporate applicable GHG reduction measures included in the GHG Strategy contained in the General Plan and Program EIR. The County shall review such projects to determine whether the following criteria are met:~~

- ~~▪ Proposed project is consistent with the current General Plan land use designation and applicable zoning designations for the project site;~~
- ~~▪ Proposed project incorporates all applicable GHG reduction measures (as documented in Appendix B to the General Plan and analyzed in the GHG Section of the Program EIR) into project design and/or as binding and enforceable mitigation measures in the project-specific CEQA document prepared for the project; and,~~

- ~~Proposed project clearly demonstrates the method, timing and process for which the project will comply with applicable GHG reduction measures and/or conditions of approval.~~

~~The County may develop more specific tiering and streamlining tools or procedures, such as a consistency review checklist, or more detailed guidance for determining consistency with the GHG Strategy.~~

~~Similarly, the County may incorporate appropriate elements of such guidance and procedures into the County's Initial Study Assessment Guidelines (ISAGs).~~

Mitigation Measure GHG-4: New Implementation Program HAZ-X: Greenhouse Gas Reduction Policy Enhancement Program

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program HAZ-X: Greenhouse Gas Reduction Policy Enhancement Program

The Climate Emergency Council that would be established under COS-CC shall develop recommended subprograms which implement the 52 policies identified in Table 4.8-8 that do not have associated implementation programs in the 2040 General Plan. Any recommendations that would require amendments to the General Plan, including any subprograms that may include expansions to programs already proposed in the 2040 General Plan, shall be provided to the County Planning Director. The Planning Director shall include the recommendation in a report for consideration by the Planning Commission and Board of Supervisors.

Mitigation Measure CTM-1: New Implementation Program CTM-X: Interim VMT CEQA Assessment Criteria

Mitigation Measure CTM-2: Revised Implementation Program CTM-B: Initial Study Assessment Guidelines

Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program

Significance after Mitigation

Regarding Mitigation Measure GHG-1, Implementation Program COS-S directs the County to update the building code to include reach codes that require new construction and major alterations to existing structures to exceed the mandatory energy performance requirements set by the 2019 building code in Title 24. Mitigation Measure GHG-1 would implement Policy COS-8.6, which states that the County will encourage zero net carbon emissions building design, which was assumed for quantifying GHG reduction benefits of the program. Adoption of a reach code is predicated on approval of a cost-effectiveness study by the CEC, pursuant to Public Resources Code Section 25402.1(h)2. Reliance on a CEC approval before the County can approve a reach code places the decision making for implementation of this program outside of the County's control, and thus, it is not certain that the goals of Implementation Program COS-S and Policy COS-8.6 would otherwise be achieved. To support the proposed reach codes under Implementation Program COS-S, Mitigation Measure GHG-1 would prohibit the installation of new natural gas infrastructure in new residential construction through amendments to the County's zoning codes.

Mitigation Measure GHG-1 also would apply to commercial building types such as offices, retail buildings, and hotels where the use of natural gas is not critical to business operations and contain appliances that can be feasibility substituted with electricity powered equivalents. Mitigation Measure GHG-2 would reduce GHG emissions by achieving energy savings at existing and future industrial buildings through benchmarking of energy consumption and providing recommendations for energy efficiency retrofitting within large, energy intensive facilities operating in the county.

Regarding Mitigation Measure GHG-3, the 2040 General Plan has relied on validated assumptions from SCAG and VCTC about the scale and type of growth anticipated through 2040. For example, the GHG forecasting assumes that the County's housing stock would increase from 32,446 to 33,472 units between 2020 and 2040, a 3 percent increase. Environmentally preferable design features or alternatives from a GHG reduction standpoint may be overlooked if an individual project tiers to a programmatic EIR which evaluated impacts of GHG emissions at a county-wide scale. The types of emerging technologies that could be available when projects are considered for discretionary and ministerial approval over the next two decades cannot be determined at this time. For this reason, Mitigation Measure GHG-3 specifies that the CEQA streamlining provision proposed as COS-EE in the 2040 General Plan be removed, and that the potential GHG emissions impacts of future, discretionary projects be reviewed in accordance with the most recent adopted version of the ISAGs at the time of project-level environmental review.

Mitigation Measure GHG-3 could result in additional GHG emission reductions if improved technologies, design features, or the like that are infeasible or unavailable today become available and are included in future development or required as part of future project-level reviews. To the extent this were to occur, this mitigation measure would improve progress toward meeting the 2030 and post-2030 GHG reduction targets. However, it would be speculative to determine at this time whether and how Mitigation Measure GHG-3 would affect future GHG emissions in the county.

Programs are critical for estimating the 2040 General Plan's targeted GHG reductions for 2030 and beyond, because they provide more detail on the specific steps that the County will take to implement GHG reducing policies. Many of the policies would achieve GHG reductions from future development but do not, on their own, specify the proactive measures that would be implemented to achieve GHG reductions. As a result, the policies, while supportive of future GHG reduction measures, do not contain enough specificity for their numeric contribution to the established 2040 target to be quantified. In other cases, the future GHG reduction effectiveness of implementation programs of the 2040 General Plan cannot be reliably quantified at this program level of analysis, although evidence from other local governments demonstrates that these types of programs achieve GHG reductions.

Mitigation Measure GHG-4 could result in additional GHG emission reductions by prompting the County to explore subprograms based on the recommendations of a Climate Emergency Council that support the policies and implementation programs of the 2040 General Plan. This approach would allow the County to develop programs and actions with increased specificity using the latest available research, tools, and methodologies available in the evolving field of climate action planning and GHG reduction. Mitigation Measures CTM-1, CTM-2, and CTM-3 would reduce the rate of VMT associated with existing and future development in Ventura County, which would also reduce GHG emissions associated with vehicle travel. Policies and Implementation Programs of the 2040 General Plan and mitigation measures that would reduce the rate of VMT associated with existing and future development in the county are described further in Section 4.16, "Transportation and Traffic."

Most of the GHG reduction policies and implementation programs included in the 2040 General Plan, and the mitigation measures identified above, are targeted to future development (as opposed to existing development), because these are the activities where the County has the greatest ability to enforce regulations, ordinances, and design standards. The modest amount of forecasted growth that would be accommodated by the 2040 General Plan (i.e., 4,099 new people, 1,281 housing units, 2,986 new jobs relative to 2015) means that future development accounts for a small share of forecasted GHG emissions; a large share of future forecasted GHG emissions in the county are the result of existing development. As a result, the policies and programs and mitigation measures targeting the modest amount of forecasted growth would not achieve sufficient GHG reductions to meet the 2030 target.

With the modest amount of forecast future growth in the county, substantial GHG reductions would need to be derived from measures targeting existing development, infrastructure, and associated activity levels. Most emissions that are forecast to occur in the county are from energy use in existing buildings, vehicle use and travel behavior influenced by the existing land use pattern and transportation systems, landfilled waste, and established agricultural operations. While the County encourages and promotes the reduction of or changes to these activities contributing to GHG emissions, it does not have the authority to enforce measures that may potentially infringe upon private property rights, reduce the economic competitiveness of local businesses, or inhibit the ability for residents to travel between residences, jobs, and amenities. Pursuant to Section 15093 of the State CEQA Guidelines, CEQA requires the lead agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable. These factors constrain the ability for the County to reduce GHG emissions from existing activities through additional mitigation measures.

Furthermore, as described in the regulatory setting, the SAFE Rule proposed by the NHTSA and EPA would limit CARB's long-term ability for enforce State-specific GHG emissions and zero emission vehicle standards for vehicles sold in California, including within the county. As described in the methodology subsection, these regulations contribute to legislatively adjusted GHG reductions for the 2040 General Plan and emissions factors used to convert VMT into CO_{2e} emissions for GHG inventories and forecasting. If California is unable to implement its Advanced Clean Car Standards and zero emission vehicle program it would impair the ability for the County to achieve GHG reductions consistent with the State's 2030 goal, and it is not feasible for the County to establish GHG emissions and zero emission vehicle standards for vehicles sold in its jurisdiction. Therefore, for all the foregoing reasons, this impact would be **significant and unavoidable**.

Impact 4.8-2: Conflict with an Applicable Plan, Policy, or Regulation for the Purpose of Reducing the Emissions of GHGs

As noted in the 2017 Scoping Plan, the long-term goal of achieving a GHG emissions reduction of 80 percent below 1990 levels by 2050, represents the State's commitment to achieving its "fair share" of GHG emissions reductions required under the Paris Agreement, which identified scientifically-based global emissions levels required to put the world on track to limit global warming to below 2°C, thereby avoiding the most catastrophic and dangerous impacts of global climate change (CARB 2017:99).

Additionally, the 2030 target codified into State law per SB 32 was established consistent with the long-term trajectory of emissions reductions required to achieve the 2050 goal. The Statewide GHG reduction goals for 2050 have not been codified, and a plan for attaining the 2050 reduction target has not been developed by CARB or the State.

Implementation of the 2040 General Plan, in combination with State laws, regulations, and programs, would result in a downward GHG emissions reductions 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. The 2017 Scoping Plan identifies the State's approach for achieving the 2030 target, which consists of policies addressing renewable electricity, energy efficiency, low carbon fuels, zero and low emission vehicles, cleaner transit systems, VMT reduction, short-lived climate pollutants, sustainable goods movement, and a Cap-and-Trade Program. The largest proportion of reductions achieved to attain the 2030 target would come from the Cap-and-Trade Program, Short-Lived Climate Pollutants, Mobile Sources and Freight, Energy Efficiency, low carbon fuels (Biofuels) and renewable electricity. Most of these policies require State-level action, while local governments such as the County also have jurisdiction and influence over the built environment and its GHG emissions. Examples include renewable energy and energy efficiency, land use decisions, and local transportation infrastructure and policy. The State has not developed a plan or approach identifying the policies needed to meet the State's post-2030 reduction targets. While it does not describe a detailed approach to meeting the State's 2050 reduction target, the 2017 Scoping Plan does make clear that coordinated actions and significant, fundamental changes involving all levels of government, private industry, and residents are required for the State to achieve its GHG reduction goals.

As described in Impact 4.8-1, the 2040 General Plan includes several implementation programs with a quantifiable effect on future GHG emissions, and a substantial number of additional programs and policies in every GHG emission sector that would result in further GHG emissions, although their effect on GHG emissions cannot be quantified at this program level of analysis. The 2040 General Plan policies and programs complement the main area of local government influence over GHG emissions, including renewable energy and energy efficiency, land use decisions, and local transportation infrastructure and policy. The available information that can be quantified demonstrates that future emissions in the county would be on a downward trajectory through 2050. Qualitative evidence shows that the many policies and programs that cannot be quantified at this time would lead to further GHG reductions and additional progress toward State GHG reduction targets. However, for these reasons and those described in Impact 4.8-1, the County cannot meaningfully quantify the effect of all its 2040 General Plan policies and programs on future GHG emissions, and there, it cannot conclude, at this program level of analysis, that future GHG emissions in the county under the 2040 General Plan would be sufficiently reduced to meet the State's 2030 or post-2030 targets.

The 2040 General Plan includes Policy COS-10.3 that requires the County to achieve GHG emissions reductions by 2040 and 2050 that are consistent with State targets. Additionally, as stated in Implementation Program COS-AA, the County would conduct an update of its community-wide GHG emissions inventory every 5 years to assess progress to date in meeting the adopted targets, and periodically update the CAP through Implementation Program COS-AA to address post-2030 emissions reduction targets and associated updates to the Scoping Plan that could be approved by the State, in light of State's long-term 2050

emission reduction goal established by EO S-3-05 and guidance included in the 2017 Scoping Plan. Implementation Programs COS-Y, COS-Z, COS-AA, COS-BB, COS-CC, COS-DD and LU-P have also been included to regularly track progress, solicit input, and make updates to the climate actions included in the 2040 General Plan, consistent with the requirements of Section 15183.5 of the State CEQA Guidelines. Table 4.8-8 describes how each of these programs supports the ongoing administration of the CAP. During review of the climate policies and programs contained in the 2040 General Plan, new State or federal legislation can be evaluated to determine if GHG reductions are occurring from these actions within the county. As part of future monitoring activities, the County may also consider new technologies that support GHG reduction or CO₂ sequestration and determine the potential application of these within the county. Nevertheless, because the 2040 General Plan would likely not, on its own, result in a sufficient level of GHG reductions for the County to meet the longer-term goal for 2050 expressed in EO S-3-05, or the 2030 target established by SB 32, this impact would be **potentially significant**.

Table 4.8-8 Programs Supporting Implementation and Monitoring of GHG Reduction Strategy

Program	How Program Supports Implementation and Monitoring
COS-X	Implements overall GHG reduction strategy including all programs and policies included in the 2040 General Plan.
COS-Y	Provides opportunity to fine tune GHG reduction policies based upon performance.
COS-Z	Allows public feedback on the strategies used to reduce GHG emissions. Communication on the strategies needed to achieve GHG reduction may support increased public participation on sustainability programs.
COS-AA	Updates to GHG emissions inventory to track GHG reduction performance.
COS-BB	Allows adjustments to be made to plan based on actual performance.
COS-CC	Advisory committee providing input on plan performance and new program development.
COS-DD	Staffing and funding for the implementation of near-term policies and programs to stay on track with meeting 2030 goals.
LU-P	Supports ongoing CAP implementation and updates in conformance with CEQA Guidelines Section 15183.5.

Mitigation Measures

Mitigation Measure GHG-1: New Implementation Program HAZ-X: Prohibit Natural Gas Infrastructure in New Residential Development

Mitigation Measure GHG-2: New Implementation Program HAZ-X: Building Energy Saving Ordinance for Industrial Buildings

Mitigation Measure GHG-3: Do Not Include Implementation Program COS-EE in the 2040 General Plan

Mitigation Measure GHG-4: New Implementation Program HAZ-X: Greenhouse Gas Reduction Policy Enhancement Program

Mitigation Measure CTM-1: New Implementation Program CTM-X: Interim VMT CEQA Assessment Criteria

Mitigation Measure CTM-2: Revised Implementation Program CTM-B: Initial Study Assessment Guidelines

Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program

No additional feasible mitigation has been identified at this time beyond the mitigation measures identified above and the policies and implementation programs of the 2040 General Plan. Under the 2040 General Plan future GHG emissions in the county would be on a downward trajectory compatible with State plans, policies, and regulations that would also result in GHG reductions in the county. However, some reductions in the transportation sector cannot be assured due to uncertainties in State regulations affecting GHG emissions from the county's transportation sector, which represents the largest share of baseline and forecast GHG emissions (as shown in Tables 4.8-1 and 4.8-2). As described in the regulatory setting, the SAFE Rule proposed by the NHTSA and EPA would limit CARB's long-term ability to enforce State-specific GHG emissions and zero emission vehicle standards for vehicles sold in California, including within the county. As of December 2019, CARB has published guidance on adjusting emissions factors to account for the SAFE Rule Part One, but this guidance focuses specifically on criteria air pollutants and does not include GHGs such as carbon dioxide, methane and nitrous oxides. The repeal of CARB's waiver for enforcing vehicle emission standards will likely impair the ability for Ventura County to achieve GHG reductions consistent with the State's 2030 goal (with similar consequences for other local governments in California). However, the precise effects of this regulatory change on GHG emissions cannot be quantified at this time due to uncertainties about the implications of the policy at the state and regional level.

Additionally, longer term GHG reduction goals beyond 2030 established by State executive orders would necessitate additional or more stringent GHG reduction policies and programs beyond what is presented in the 2040 General Plan. However, due to the County's minimal growth, most of the forecast GHG emissions in 2030 and beyond are caused or influenced by from 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 enforce stringent actions resulting in GHG reductions beyond what have been already been included in the 2040 General Plan and the mitigation measures identified in Impact 4.8-2. Per Section 15093 of the State CEQA Guidelines, CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. Under this guidance, decision-making agencies may consider weighing the adverse and unavoidable impacts resulting from global GHG emissions, against mitigation measures that may reduce the economic productivity of established businesses, and/or impose limitations on technologies available for agricultural production, transportation, and construction. Although the 2040 General Plan would not conflict with State GHG reduction targets and recommended local actions established in the 2017 Scoping Plan, and the 2040 General Plan would set future GHG emissions on a downward trajectory consistent with State reduction targets, it cannot be determined at this program level of analysis that future emissions within the county meet State 2030 and post-2030 targets for GHG reduction. Therefore, this impact would be **significant and unavoidable**.

4.9 HAZARDS, HAZARDOUS MATERIALS AND WILDFIRE

This section evaluates the potential effects of implementing the 2040 General Plan on hazards, hazardous materials and hazardous waste, and wildfire including the transportation and use of hazardous materials that could create a significant health risk, exposure to hazards as result of proximity to contaminated sites, emission of hazardous materials in proximity to schools, the creation of hazards in relation to a project's proximity to airports, and the exposure of people and property to wildfire hazards. Please see Section 4.11, "Noise and Vibration," of this draft EIR for a discussion of airport noise, including airport noise contours and development restrictions. As described in the "Approach to the Environmental Analysis" section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan's potential impacts.

Comments on the notice of preparation included concerns regarding the use of pesticides and herbicides, airport safety zones, hazardous materials sites, evacuation routes, and oil and gas extraction hazards. These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

4.9.1 Background Report Setting Updates

REGULATORY SETTING

In addition to the information provided in Section 3.9, "Other Agency Plans;" Section 6.5, "Goods Movement;" Section 6.6, "Aviation Facilities and Services;" Section 11.3, "Wildfire Hazards;" Section 11.4, "Aviation Hazards;" Section 11.5, "Hazardous Materials;" and Section 12.2, "Climate Change Effects," of the Background Report (Appendix B), the following regulatory setting information is relevant to understanding the potential hazards, hazardous materials, hazardous waste, and wildfire impacts of the 2040 General Plan:

- ▶ **Ventura County Emergency Operations Plan.** The Emergency Operations Plan (EOP) addresses the County's planned response to extraordinary emergency situations and natural, human-caused or technological disasters (Ventura County 2016). The EOP does not address normal day-to-day emergencies, nor does it address the established and routine procedures used in coping with such emergencies. Instead, the operational concepts reflected in the EOP focus on potential large-scale disasters that can generate unique situations requiring unusual emergency responses. The EOP is a preparedness document, so it is designed to be read, understood, and exercised prior to an emergency. It designates the County as part of the California Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS).

Each element of the emergency management organization is responsible for assuring the preparation and maintenance of appropriate and current Standard Operating Procedures (SOPs) resource lists and checklists that detail how assigned responsibilities are performed to support implementation of the EOP and to ensure an effective response during a major disaster. Such SOPs should include the specific emergency authorities that designated officials and their successors can assume during emergency situations.

The EOP is to be updated tri-annually to ensure that plan elements are valid and current. Each responsible organization or agency will review and update its portion of the EOP and/or modify its SOP/EOP as required based on identified deficiencies experienced in drills, exercises or actual occurrences.

- ▶ **Ventura County Fire Code.** On October 15, 2019, the Ventura County Board of Supervisors adopted Ventura County Fire Protection District Ordinance No. 31 which repeals Fire District Ordinance No. 30, adopts by reference the 2019 California Fire Code (CFC), portions of the 2018 edition of the International Fire Code (IFC), and portions of the California Code of Regulations (CCR) Title 19, and incorporates by reference Fire District Ordinance No. 29. Fire District Ordinance No. 31 is known as the Ventura County Fire Code.

Prior to adoption of Ordinance No. 31, the Ventura County Fire Code in effect was adopted pursuant to Fire District Ordinance No. 30, which incorporated the 2016 edition of the CFC and the 2015 edition of the IFC, as amended by the Board in 2016. The IFC was created in the late 1990s when the three national regional "legacy" codes (National Building Code, Uniform Building Code, and Standard Building Code) were merged into a single model code. This task took several years, and the first edition of the IFC was published in 2000. Since that time, a growing number of jurisdictions across the country have adopted, modified, and called it their own. The State of California recently adopted and published the 2019 CFC, which is based on the 2018 IFC and becomes effective on January 1, 2020. All provisions of the 2019 CFC will be automatically applicable throughout the State on January 1, 2020, unless local jurisdictions amend one or more sections of the CFC.

Fire District Ordinance No. 29, also known as the Ventura County Fire Apparatus Access Code, establishes the minimum and cumulative design and maintenance standards for emergency fire access roads. These provisions permit emergency resources to respond to an incident in a safe and effective manner. The ordinance applies to all Fire Apparatus Access Roads, whether public or private, located within the jurisdictional boundaries of the Ventura County Fire Protection District. It includes road design, signage, and marking requirements and provisions for enforcement. Access roads subject to the requirements of Section 1270 of Title 14 of the CCR, as that section may be amended from time to time, shall comply with the most restrictive requirements.

ENVIRONMENTAL SETTING

In addition to the information provided in Section 3.9, "Other Agency Plans;" Section 6.5, "Goods Movement," Section 6.6 "Aviation Facilities and Services," Section 11.3 "Wildfire Hazards;" Section 11.4, "Aviation Hazards;" Section 11.5, "Hazardous Materials;" and Section 12.2, "Climate Change Effects;" of the Background Report (Appendix B), the following information is relevant to understanding the potential hazards, hazardous materials, hazardous waste, and wildfire impacts of the 2040 General Plan:

- ▶ **Thomas Fire.** On December 4, 2017, the Thomas Fire was started by power lines coming into contact during a high wind event (VCFD 2019). The Thomas Fire burned a total of 281,893 acres in Ventura and Santa Barbara Counties, destroyed 1,063 structures (409 within unincorporated Ventura County), and resulted in one civilian and one firefighter fatality (VCFD 2019).

- ▶ Woolsey Fire. The Woolsey Fire started on November 8, 2018 and burned 96,949 acres in Ventura and Los Angeles Counties (CAL FIRE 2019). The Woolsey Fire began in the county shortly after the start of the Hill Fire, also in the county, located 15 miles to the west. The Woolsey Fire destroyed 1,643 structures (208 within unincorporated Ventura County) and resulted in three civilian deaths (LACFD 2018).
- ▶ Table 11-4 of the Background Report listed the ten largest fires in the county between 1965 and 2015. The Thomas Fire, at 281,893 acres, should be included as the largest and most destructive fire in county history. The Woolsey Fire, at 96,949 acres, should now be included as the fourth largest fire.

4.9.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

This analysis includes a program-level, qualitative assessment of impacts related to hazards, hazardous materials, and wildfire. Specific methodologies for hazardous materials and hazardous waste, aviation hazards, and wildfire hazards are discussed below.

Hazardous Materials and Hazardous Waste

The assessment evaluates whether the project could use or transport hazardous materials, require the use of existing or future underground storage tanks, produce hazardous waste, or be located in an area of known contamination. The analysis discusses the applicable regulations that would reduce environmental effects.

Aviation Hazards

The analysis evaluates whether the project could occur within the sphere of influence (SOI) of any airport. If development may occur within an airport SOI, the analysis evaluates the compatibility of the proposed land uses with the County's adopted Airport Comprehensive Land Use Plan (Ventura County ALUC 2000).

Wildfire Hazards

Consistent with the recommended methodology in ISAG Section 18, "Fire Hazards," and Appendix G Section XX, "Wildfire," the analysis evaluates whether the project is located in or near an area designated as being at high risk for fire. Compliance with applicable building codes, including the fire code, would generally reduce potential effects, but site-specific constraints may require additional mitigation to reduce fire hazard risk.

In response to 2019 revisions to the State CEQA Guidelines (Public Resources Code Section 15126.2) and the 2015 California Supreme Court case, *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, impacts from exposure of a project to environmental hazards are not considered significant effects unless a project exacerbated the risks from such hazards. However, lead agencies retain the authority, separate and apart from CEQA, to include a review of potential impacts of the environment on a project when a project is undertaken by a lead agency, such as the 2040 General Plan. The 2040 General Plan is a comprehensive document that broadly establishes policy, not only related to the environment, but also related to public health and safety. Therefore, the analysis of hazards in this section considers whether the 2040 General Plan could cause or exacerbate hazards impacts and whether the 2040 General Plan could result in impacts from exposure to hazards. The discussion of potential impacts from exposure to geologic hazards is provided for information purposes only and is neither required by CEQA nor subject to its requirements.

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on the County’s adopted ISAG, which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project’s impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, the thresholds incorporate the following items: ISAG Section 18, “Fire Hazards;” ISAG Section 19, “Aviation Hazards;” ISAG Section 20a, “Hazardous Materials/Waste—Materials;” ISAG Section 20b, “Hazardous Materials/Waste—Waste;” ISAG Section 23, “Public Health;” Appendix G Section X, “Hazards and Hazardous Materials;” and Appendix G Section XX, “Wildfire.” Many of the thresholds contained in the ISAG require project-specific information, such as evaluation of whether a project meets applicable regulatory requirements (e.g., underground storage tanks compliant with California Health and Safety Code, Division 20, Chapter 6.7 and the California Code of regulations Title 23, Division 3, Chapter 16). Because the 2040 General Plan is a program-level planning document, it would be too speculative to determine at this time the project-specific nature of future development that may occur under the 2040 General Plan. As such, where the thresholds included in the ISAG are inherently project-specific in nature, the Appendix G threshold is provided to allow for a programmatic analysis.

This draft EIR includes as thresholds the following questions from Appendix G: question IX(a) regarding routine transport, use, or disposal of hazardous materials, question IX(b) regarding upset or accident conditions involving the release of hazardous materials, question IX(c) regarding hazardous emissions or materials in close proximity to schools, and question IX(d) regarding sites included on a list of hazardous materials sites. In addition, this draft EIR includes as threshold ISAG Section 19 and Appendix G question IX(e) regarding noise and safety effects resulting from land uses incompatible with airports, and ISAG Section 18 and Appendix G questions XX(a-c) and IX(f-g) regarding impacts related to wildfire.

Note that ISAG Sections 20a, 20b, and 23 include thresholds that are project-specific in nature, and therefore not expressly included in the thresholds of significance developed for this analysis. However, the ISAG thresholds are covered within the thresholds derived from the Appendix G questions.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant impact on hazards, hazardous materials, and wildfire if it would:

- ▶ Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

- ▶ Create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- ▶ Emit hazardous emissions or handle hazardous materials within 0.25 mile of an existing or proposed school.
- ▶ Create a significant hazard due to location on a site which is included on a list of hazardous materials sites.
- ▶ Locate inconsistent land uses within the sphere of influence of any airport, or otherwise result in excessive noise or a safety hazard for people residing or working near an airport.
- ▶ Expose people to risk of wildfire by locating development in a High Fire Hazard Area/Fire Hazard Severity Zone, substantially impairing an adopted emergency response plan or evacuation plan, exacerbate wildfire risk, expose people to pollutants from wildfire, or result in post-wildfire changes that could cause flooding, landslide, or drainage changes.

ISSUES NOT DISCUSSED FURTHER

The Area Plans for communities of El Rio/Del Norte, Lake Sherwood, North Ventura, Oak Park, Ojai, Piru, and Thousand Oaks were reviewed for policies and implementation programs specific to these Area Plans that would potentially have impacts on the environment with respect to hazards, hazardous materials, hazardous waste, and wildfire. The 2040 General Plan would not result in substantive changes to Area Plan policies and implementation programs related to transportation and use of hazardous materials that could create a significant health risk, exposure to hazards as result of proximity to contaminated sites, emission of hazardous materials in proximity to schools, the creation of hazards in relation to a project's proximity to airports, and the exposure of people and property to wildfire hazards. The Area Plan policies and implementation programs related to these issues are consistent with the policies and implementation programs of the 2040 General Plan, which are addressed in the following discussions. Therefore, the environmental effects of the Area Plan policies and implementation programs are not addressed separately in this section.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to hazards, hazardous materials, and wildfire and, specifically, the thresholds of significance identified above, include the following:

Circulation, Transportation, and Mobility Element

- ▶ **Policy CTM-5.1: Airport Effects.** The County shall strive to minimize adverse environmental and safety effects of County airports on the surrounding communities. (RDR, SO) *[Source: Existing GPP Goal 4.2.1.14, modified]*
- ▶ **Policy CTM-5.3: Private Airstrips and Agricultural Landing Fields.** The County shall require private airstrips and agricultural landing fields to be sited to minimize conflicts with the flight paths of existing airports and other areas that would present significant hazards or nuisances. (SO, JP) *[Source: Existing GPP Goal 4.2.1.13]*

- ▶ **Policy CTM-5.5: Airport Land Use Compatibility.** Discretionary development that would endanger the efficient, safe operation of an airport or would result in significant land use incompatibility impact with an airport shall be prohibited. (RDR, SO) *[Source: Existing GPP Policy 4.2.2.10, modified]*

Hazards and Safety Element

- ▶ **Policy HAZ-1.1: Fire Prevention Design and Practices.** The County shall continue to require development to incorporate design measures that enhance fire protection in areas of high fire risk. This shall include but is not limited to incorporation of fire-resistant structural design, use of fire-resistant landscaping, and fuel modification around the perimeter of structures. (RDR, PI) *[Source: Existing GPP Policy 2.13.2.2]*
- ▶ **Policy HAZ-1.2: Defensible Space Clear Zones.** The County shall require adherence to defensible space standards, or vegetation “clear zones,” for all existing and new structures in areas that are designated as Hazardous Fire Areas by the Ventura County Fire Protection District and High Fire Hazard Severity Zones by the California Department of Forestry and Fire Protection. (IGC, PI, RDR) *[Source: New Policy]*
- ▶ **Policy HAZ-1.3: Controlled Burns and Other Fire Prevention Measures.** The County shall continue to recognize the role of fire in local ecosystems by supporting controlled burns and other fire prevention measures. (IGC) *[Source: Existing Ojai Valley Area Plan Goal 1.4.1.3, Ojai Valley Area Plan Goal 2.3.1.3, Ojai Valley Area Plan Program 2.3.3.1, Piru Area Plan Goal 2.3.1.3, and Thousand Oaks Area Plan Goal 1.3.1.8]*
- ▶ **Policy HAZ-1.4: Development in High Fire Hazard Severity Zones and Hazardous Fire Areas.** The County shall require the recordation of a Notice of Fire Hazard with the County Recorder for all new discretionary entitlements (including subdivisions and land use permits) within areas designated as Hazardous Fire Areas by the Ventura County Fire Department or High Fire Hazard Severity Zones by the California Department of Forestry and Fire Protection (CAL FIRE). (RDR) *[Source: New Policy]*
- ▶ **Policy HAZ-1.5: Discouragement of Home-Building in Very High Fire Severity Zones.** The County shall discourage the building of homes in Very High Fire Severity Zones. (RDR) *[Source: New Policy]*
- ▶ **Policy HAZ-1.6: Wildfire Risk Education.** The County shall continue to develop and distribute educational materials and conduct educational outreach activities informing the public about wildfire risk and protection strategies. (PSR, IGC, PI) *[Source: New Policy]*
- ▶ **Policy HAZ-1.7: Post-Fire Community and Natural Resource Recovery.** The County shall assemble an interagency team as needed to maintain response plans and coordinate the management of resources following wildfire events. (PSR, IGC) *[Source: New Policy]*
- ▶ **Policy HAZ-1.8: Federal Fire Risk Management.** The County should collaborate with the federal agencies to better manage fuel loads on federally-owned or managed lands. (IGC) *[Source: New Policy]*
- ▶ **Policy HAZ-5.1: Hazardous Materials and Waste Management.** The County shall manage hazardous materials and wastes produced by County facilities and operations in such a way that waste reduction through alternative technology is the County’s first priority.

When not possible, the County's priorities will progress from recycling and reuse, then on-site treatment, and finally disposal as the last resort. (SO) *[Source: Existing GPP Policy 2.15.2.1, modified]*

- ▶ **Policy HAZ-5.2: Hazardous Materials and Waste Management Facilities.** The County shall require discretionary development involving facilities and operations which may potentially utilize, store, and/or generate hazardous materials and/or wastes be located in areas that would not expose the public to a significant risk of injury, loss of life, or property damage and would not disproportionately impact Designated Disadvantaged Communities. (SO) *[Source: Existing GPP Policy 2.15.1.2, modified]*
- ▶ **Policy HAZ-5.3: Preventing Contamination of Natural Resources.** The County shall strive to locate and control sources of hazardous materials to prevent contamination of air, water, soil, and other natural resources. (SO) *[Source: New Policy]*
- ▶ **Policy HAZ-5.4: Household Hazardous Waste.** The County shall continue to develop and distribute educational materials and conduct educational outreach to inform the public about household hazardous waste and the proper disposal methods. (PI) *[Source: New Policy]*
- ▶ **Policy HAZ-5.5: Hazardous Waste Reduction at the Source.** The County shall, as part of the discretionary review process, require that hazardous wastes and hazardous materials be managed in such a way that waste reduction through alternative technology is the first priority, followed by recycling and on-site treatment, with disposal as the last resort. (RDR) *[Source: Existing GPP Policy 2.15.1.1, modified]*
- ▶ **Policy HAZ-5.6: Hazardous Materials – County Regulatory Oversight.** The County shall continue to provide regulatory oversight for all facilities or activities that store, use, or handle hazardous materials. (SO) *[Source: Existing GPP Policy 2.15.2.3, modified]*
- ▶ **Policy HAZ-5.7: Presence of Hazardous Wastes.** Applicants shall provide a statement indicating the presence of any hazardous wastes on a site, prior to discretionary development. The applicant must demonstrate that the waste site is properly closed, or will be closed, pursuant to all applicable state and federal laws, before the project is inaugurated. (RDR) *[Source: Existing GPP Policy 2.15.2.4, modified]*
- ▶ **Policy HAZ-5.8: Siting Criteria for Hazardous Waste Generators.** The County shall require commercial or industrial uses which generate, store, or handle hazardous waste and/or hazardous materials to locate, operate, and maintain hazardous waste and/or hazardous materials in a manner that does not endanger public health and safety and is located based on objective criteria that do not disproportionately impact Designated Disadvantaged Communities. (RDR) *[Source: Existing GPP Policy 2.15.2.5, modified]*
- ▶ **Policy HAZ-6.1: Airport Land Use Plan.** The County shall regulate land use types, density, and intensity using guidance from the Ventura County Comprehensive Airport Land Use Plan, Point Mugu Air Installations Compatible Use Zones (AICUZ) study, State Aeronautics Act, and California Airport Land Use Planning Handbook guidelines. (RDR) *[Source: New Policy]*
- ▶ **Policy HAZ-6.2: Airport Safety Zones.** The County shall require density and allowed uses within the Airport Safety Zones to be as defined in the Ventura County Airport

Comprehensive Land Use Plan (ACLUP) and the current Point Mugu Air Installations Compatible Use Zones (AICUZ) study, as applicable to the project location. The County shall require any overrides of a determination of inconsistency with the ACLUP to be done in accordance with State law. (RDR) *[Source: New Policy]*

- ▶ **Policy HAZ-6.3: Airspace Protection.** The County shall use the current Ventura County Airport Comprehensive Land Use Plan (ACLUP) and Federal Aviation Administration (FAA) airport design standards and Part 77 surfaces to keep the airspace surrounding each airport or airfield free of objects affecting navigable airspace where required by the FAA or shall limit the height of objects as required by the FAA. The County shall also ensure obstruction clearance is provided for all enroute and terminal (airport) instrument procedures as per the United States Standard for Terminal Instrument Procedures (TERPS) to avert modifications to any planned or published instrument approach or instrument departure procedures at the affected airport or airfield. (RDR) *[Source: Existing GPP Policy 2.14.2.2(2), modified]*
- ▶ **Policy HAZ-6.4: Private Airstrips and Agricultural Landing Fields.** The County shall require private airstrips and agricultural landing fields be sited so as not to conflict with the flight paths of existing airports and outside of areas that would present significant hazard or an annoyance to existing or planned land uses. (RDR) *[Source: Existing GPP Policy 2.14.2.2(3), modified]*
- ▶ **Policy HAZ-6.5: Review by Ventura County Transportation Commission.** The County shall require discretionary development within the Airport Safety Zones, as defined in the Ventura County Airport Comprehensive Land Use Plan for (ACLUP), shall be reviewed by the Ventura County Transportation Commission (VCTC) for consistency with the ACLUP. (RDR) *[Source: Existing GPP Policy 2.14.2.2(4), modified]*
- ▶ **Policy HAZ-6.6: Recordation of a Notice of Aviation Hazard.** The County shall require the recordation of a Notice of Aviation Hazard with the County Recorder for new discretionary entitlements (including subdivisions and land use permits) within the Airport Safety Zones identified in the Ventura County Comprehensive Airport Land Use Plan. (RDR) *[Source: New Policy]*
- ▶ **Policy HAZ-6.7: Risk Reduction for Railroad and Trucking Hazards.** The County shall condition discretionary development to minimize, to the maximum extent practical through site design or setbacks, the risk for exposure to railroad and trucking hazards. (RDR) *[Source: Existing GPP Policy 2.14.2.3]*
- ▶ **Policy HAZ-6.8: Airport Safety Zones.** The County shall designate land located within the Airport Safety Zones, as defined in the current Airport Comprehensive Land Use Plan, as Agricultural or Open Space on the General Plan Land Use Diagram, and limit such land to the following uses:
 - Agriculture and agricultural operations;
 - Cemeteries;
 - Energy production from renewable resources;

- Mineral resource development;
 - Public utility facilities;
 - Temporary storage of building materials;
 - Waste treatment and disposal; or
 - Water production and distribution facilities. (RDR, MPSP) *[Source: Existing GPP Policy 2.14.2.2(1), modified]*
- **Policy HAZ-7.1: Oil Spill Prevention.** The County shall review and analyze all proposed oil and gas exploration and production projects, and shall condition all County discretionary permits for such projects, to require compliance with local, State, and federal oil spill prevention regulations. The County shall also provide input and comments on permit applications that are under the purview of an outside agency. (RDR, IGC) *[Source: Existing GPP Policy 2.14.2.4, modified]*
- **Policy HAZ-12.1: Access Points for New Subdivisions.** The County shall require new residential subdivisions to provide not less than two means of access for emergency vehicles and resident evacuation. A deviation from this policy is only allowed if a single proposed access road conforms to the County Road Standards, Ventura County Fire Department Access Standards, and when the County Fire Chief approves the proposed deviation. (RDR) *[Source: Existing GPP Policy 2.13.2.3, modified]*
- **Policy HAZ-12.2: Countywide Hazard Mitigation Planning.** The County shall continue to maintain and periodically update the Ventura County Emergency Operations Plan and the Ventura County Hazard Mitigation Plan covering hazards in the county. (MPSP, IGC, PI) *[Source: Existing GPP Program 2.1.3.5, modified]*
- **Policy HAZ-12.3: Siting of Essential Facilities.** The County should not site essential facilities, public safety or emergency service facilities, special occupancy structures, or hazardous materials storage facilities in areas subject to the following hazard areas, as defined in the County Multi-Hazard Mitigation Plan (Ventura County Sheriff's Office of Emergency Services), unless the structure is designed to mitigate the hazard:
- in tsunami hazard areas, as defined in the Operational Area Tsunami Evacuation Plan (Ventura County Sheriff's Office of Emergency Services);
 - geologic or seismic hazard areas;
 - areas subject to liquefaction, landslide, or seiche hazards; and
 - subsidence or hydroconsolidation. (RDR) *[Source: Existing GPP Policy 2.6.2.1, Existing GPP Policy 2.9.2.3, modified]*

Implementation Programs

- **Implementation Program A: Develop and Implement Educational Programs for Wildfire Resilience.** In coordination with federal, State, and local partners (e.g., CAL FIRE), the County shall update and maintain educational programs related to such issues as:

- Learning how to recognize the first signs of fire and take appropriate action;
 - Living with the risks of fire within the wildland/urban interface; and
 - Methods of improving the resilience of homes and other structures. *[Source: New Program]*
- ▶ **Implementation Program B: Wildfire Vulnerability Assessment and Mapping.** In collaboration with the federal, State, and local partners (e.g., CAL FIRE), U.S. Forest Service, other agencies involved in wildfire response planning), the County shall update and map new locations that may be vulnerable to wildfire hazards including: damage to electrical, transportation, and communication infrastructure; increased rates of erosion, landslide, and water quality degradation; loss of residential, commercial, and industrial structures; and ecological disturbance. *[Source: New Program]*
 - ▶ **Implementation Program C: Post-Fire Assessments.** Directly following a wildfire disaster, the County shall conduct a post-fire assessment to identify vulnerabilities and projects that address vulnerabilities. The goal of the post-fire assessment shall be to protect public safety, enhance access and evacuation, and reestablish essential functional needs to communities and ecosystems to minimize flooding, protect water quality, reduce landslide and debris flow occurrence, and limit pollution. *[Source: New Program]*
 - ▶ **Implementation Program J: Hazardous Materials Business Plan and Hazardous Materials Response Plans.** The County shall continue to require Hazardous Materials Business Plans and Hazardous Materials Response Plans for any business which handles hazardous material to ensure that plans for emergency response to a release or threatened release of a hazardous material and/or waste are maintained and monitored. *[Source: New Program]*
 - ▶ **Implementation Program K: Marine Oil Spill Response Planning.** County facilities that could potentially be the source of a marine oil spill and onshore oil spill shall develop, exercise, review, and share their prevention and response plans with regulatory and emergency agencies. *[Source: Existing Program 2.14.3.5]*
 - ▶ **Implementation Program L: Marine Oil Spill Response Plan.** The Sheriff's Office of Emergency Services shall annually review the County's Marine Oil Spill Response Plan. The County shall continue to participate in the U.S. Coast Guard Area Contingency Plan process. *[Source: Existing Program 2.14.3.4]*
 - ▶ **Implementation Program O: Solar Concentration Restriction.** The County shall modify the NCZO and CZO, if necessary, to prohibit the placement and use of facilities that use solar concentration for generation of commercial power that could generate glare and potential to disable pilots and impact flight or test operations at Naval Base Ventura County. *[Source: JLUS Strategies ED-1A, LG-1A, and LG-1D]*
 - ▶ **Implementation Program X: Countywide Hazard Mitigation Plan.** The County Sheriff's Department Office of Emergency Services (OES) shall continue to maintain and update the Ventura County Hazard Mitigation Plan every five years and periodically update the Ventura County Emergency Operations Plan. Updates will include including mitigation measures and preparedness, response, and recovery strategies for hazards identified in this Element. To the extent feasible, County agencies shall, and other public agencies are encouraged to, participate in joint emergency planning and response training, and cooperatively respond to emergencies when they occur. *[Source: Existing GPP Program 2.1.3.5, modified]*

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.9-1: Create a Significant Hazard to the Public or the Environment Through the Routine Transport, Use, or Disposal of Hazardous Materials or Hazardous Waste

A hazardous material (hazmat) is any solid, liquid, or gas that can harm people, other living organisms, property, or the environment (FEMA 2007). Chemicals that are considered hazardous materials are widely used in daily activities. They purify drinking water, increase crop production, and simplify household chores. Hazards can occur during production, storage, transportation, use, or disposal. Hazardous materials in various forms can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Many products containing hazardous chemicals are also routinely used and stored in homes. These products are also shipped daily on highways, railroads, waterways, and pipelines. Chemical manufacturers are one source of hazardous materials, but there are many others, including service stations, hospitals, and hazardous materials waste sites. Varying quantities of hazardous materials are manufactured, used, or stored at facilities in unincorporated Ventura County, including local dry-cleaning establishments and gardening supply stores. Hazardous materials come in the form of explosives, corrosives, flammable and combustible substances, poisons, and radioactive materials.

A hazardous waste is a waste with properties that make it dangerous or capable of having a harmful effect on human health or the environment (US EPA 2019). Hazardous waste is generated from many sources, ranging from industrial manufacturing process wastes to batteries and may come in many forms, including liquids, solids gases, and sludges.

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential e States and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells.

The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

Implementation of the 2040 General Plan would accommodate future development that could involve the use, storage, disposal and transportation of hazardous materials or hazardous waste. Although hazardous materials and hazardous waste can be associated with activities allowed to occur in all land use designations, those that are more likely to regularly use, store, dispose of, or transport hazardous materials or generate hazardous waste include agricultural, industrial, and commercial. Industrial land uses would likely have the highest potential to use, transport, store and dispose of hazardous materials or hazardous waste in quantities that could pose a significant risk to humans or the environment.

Additionally, the transportation of hazardous materials and hazardous waste may increase as a direct result of increased hazardous materials usage within the county. As described in Section 11.5, "Hazardous Materials," of the Background Report, there are over 2,600 facilities within the county that store and use hazardous materials or generate hazardous waste (Appendix B:11-64). The transportation of hazardous materials waste occurs mostly along major roadways; however, because hazardous material usage could occur anywhere in the county, potentially any roadway could be used to transport hazardous materials or waste. Therefore, it is likely that the transportation of hazardous materials or wastes would cross through or pass by all land use types in the county, including residential and other sensitive land uses.

In addition to existing State and federal laws and permitting processes, the 2040 General Plan would include several policies and implementation programs that would reduce potential impacts related to hazardous materials and hazardous waste. For example, Policies HAZ-5.1, HAZ-5.3, HAZ-5.4, HAZ-5.6, and HAZ-12.3 address hazardous materials by directing the County to manage its own hazardous materials and provide regulatory oversight for discretionary projects and all facilities that store, use, or handle hazardous materials. Policies HAZ-5.2, HAZ-5.5, HAZ-5.8, and HAZ-7.1 provide guidance for the location, operation, and management of discretionary developments, including oil and gas exploration and production sites such that future development would reduce potential impacts to public health and the environment. Implementation Program J protects people and the environment from hazardous materials and waste by requiring all businesses that handle hazardous materials to prepare Hazardous Materials Business Plans and Hazardous Materials Response Plans to ensure that emergency response plans for potential inadvertent release of hazardous materials or waste are maintained and monitored. Implementation Programs K and L require County facilities that could be the source of a marine or onshore oil spill to share their prevention and response plans with regulatory and emergency agencies.

Future development under the 2040 General Plan may result in the routine use, transport, or disposal of hazardous materials or hazardous waste. However, County activities and discretionary development would be required to comply with State law, federal law, and 2040 General Plan policies and implementation programs that would substantially lessen potential impacts related to the use, storage, transport, or disposal of hazardous materials or hazardous waste. Therefore, implementation of the 2040 General Plan would not create a significant hazard to the public or the environments related to the use, transport, or disposal of hazardous materials or hazardous waste. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.9-2: Create a Significant Hazard to the Public or the Environment Through the Reasonably Foreseeable Upset and Accident Conditions Involving the Release of Hazardous Materials or Hazardous Waste into the Environment

As described in Impact 4.9-1 above, hazardous materials and hazardous waste are regularly used and transported in the county. Although such activities involve strict regulations under State and federal law regarding monitoring and handling, accidental release of hazardous materials or hazardous waste due to natural disasters, human error or misuse is possible. Future development under the 2040 General Plan could accommodate activities in the agricultural, industrial, commercial and other land use designations that typically involve the use and storage of hazardous materials or generation of hazardous waste. Additionally, forecasted growth that would be accommodated by the 2040 General Plan could result in increased demand for existing goods and services, such as industrial manufacturing or drycleaners, which involve the use of hazardous materials and generation of hazardous waste,. Therefore, the number of facilities that use, store, or generate hazardous materials or hazardous waste, and/or the total amount of hazardous materials or waste that is used, stored, disposed of or generated, which may have the potential to result in a reasonably foreseeable upset or accident condition involving the release of hazardous materials or hazardous waste into the environment, could increase under the 2040 General Plan.

Implementation of the 2040 General Plan would have the potential to result in adverse impacts to the public and environment from an unplanned accidental release of hazardous materials or hazardous waste. Within the county, there are 300 hazardous materials sites, including permitted underground storage tanks, 273 sites that have undergone or are undergoing remediation, and one leaking underground storage tank designated for site assessment (Appendix B:11-64). Additionally, the public or environment could also inadvertently be exposed to hazardous materials or hazardous waste through construction activities which involve material removal such as asbestos, lead or underground storage tanks; during construction on properties with existing contamination; during transportation from facilities within the county to facilities outside the county; or in areas where established populations are located near facilities that use, store or dispose of hazardous materials or hazardous waste.

As noted in ISAG Section 23, two constituents associated with rocket engine testing, perchlorate and trichloroethylene (TCE), have been detected in southeast Ventura County at the Santa Susana Field Laboratory site. Due to these results, applicants for development projects within two miles of former or current rocket engine testing are required to test for the constituents perchlorate and TCE. Also, applicants for all discretionary projects proposing to utilize groundwater in any capacity that are located within two miles of the boundary of a former or current test site for rocket engines are required to test the groundwater for perchlorate and TCE. The degree of potential threat of off-site contamination of soil has not been established, therefore, applicants for discretionary development consisting of residential general plan amendments, zone changes and subdivisions that increase density are required to test the soil for perchlorate and TCE. If the constituents are found to be present in soil and/or groundwater, appropriate remediation actions would be required consistent with regulatory requirements for the land uses proposed.

Numerous federal, State, and local regulations exist to protect people and the environment from potential accidental release of hazardous materials or hazardous waste. Additionally, 2040 General Plan policies and implementation programs would also help protect people and the environment from accidental upset of hazardous materials or hazardous waste. For example, Policies HAZ-5.1, HAZ-5.3, HAZ-5.4, HAZ-5.6, and HAZ-12.3 address hazardous materials by directing the County to manage its own hazardous materials and provide regulatory oversight for discretionary development and all facilities that store, use, or handle hazardous materials, thus reducing the potential for accidental upset or spill. Policies HAZ-5.2, HAZ-5.5, HAZ-5.8, and HAZ-7.1 provide guidance for the location, operation, and management of discretionary developments, including oil and gas exploration and production sites, so as to minimize the potential for adverse effects to people and the environment in the event of accidental spills. Implementation Program J protects people and the environment from hazardous materials and waste by requiring all businesses that handle hazardous materials to prepare Hazardous Materials Business Plans and Hazardous Materials Response Plans to ensure that emergency response plans for potential inadvertent release of hazardous materials or waste are maintained and monitored. Implementation Programs K and L require County facilities that could be the source of a marine or onshore oil spill to share their prevention and response plans with regulatory and emergency agencies.

Implementation of the 2040 General Plan could accommodate an increase in activities that commonly store, use, and dispose of hazardous materials and hazardous waste, such as in the agricultural, industrial, open space, and commercial land use designations. Additionally, existing industries and businesses that use hazardous materials or generate hazardous waste may expand or increase in response to the forecasted growth accommodated by the 2040 General Plan. However, future development accommodated by the land use designations of the 2040 General Plan would be required to comply with applicable federal, State and local regulations, and 2040 General Plan policies related to the transportation, use, storage, and disposal of hazardous materials and hazardous waste. Compliance with such regulations would minimize the potential for an accidental release to occur and provide planning mechanisms for prompt and effective cleanup if an accidental release did occur. Therefore, the impact related to an accidental hazardous materials or waste release would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.9-3: Emit Hazardous Emissions or Handle Hazardous Materials Within One-Quarter Mile of an Existing or Proposed School

As described in Impacts 4.9-1 and 4.9-2 above, hazardous materials are regularly used and transported in the county, and activities allowed to occur under each land use designation of the 2040 General Plan have the potential to use, store, transport and dispose of hazardous materials or hazardous waste. Schools use, store, transport, and dispose of hazardous materials or hazardous waste, such as cleaning products and laboratory chemicals, that potentially pose a risk to people or the environment if not properly used, stored, disposed of or transported. Implementation of the 2040 General Plan could result in the use, storage, disposal, or transport of hazardous materials within 0.25 mile of an existing or proposed school.

Although hazardous materials can be associated with activities allowed to occur under all 2040 General Plan land use designations, those that are more likely to regularly use high quantities of hazardous materials include agricultural, industrial, and commercial. As noted in Section 11.5 of the Background Report, the county contains 231 schools divided among 21 school districts (Appendix B:7-97, 7-98). In addition, new schools could be constructed in the future under the 2040 General Plan, and their potential locations are not known at this time. Therefore, implementation of the 2040 General Plan could result in agricultural, commercial, or industrial uses, or the transport of hazardous materials to and from these uses, within 0.25 mile of an existing or proposed school. Federal and State regulations exist to protect public health and the environment from hazardous emissions and hazardous materials handling within 0.25 mile of an existing or proposed school. In the county, discretionary development projects are reviewed for potential hazardous emissions or substances under using the ISAG. Section 15186 of the State CEQA Guidelines establishes requirements for school projects, as well as projects near schools, to ensure that potential health impacts resulting from exposure to hazardous materials, wastes, and substances are examined and disclosed in an environmental document. State CEQA Guidelines Section 15186 also states that hazardous materials that must be considered a risk are those which may impose a health or safety hazard to persons who would attend or would be employed at the school. Specifically, when a project located within 0.25 mile of a school involves the construction or alteration of a facility that might emit or handle acutely hazardous materials in a quantity equal to or greater than that specified in Section 25536(a) of the Health and Safety Code, the lead agency must consult with the affected school district regarding the potential impact of the project when circulating the environmental document and notify the affected school district in writing prior to approval and certification of the environmental document. Moreover, all County permits that include storage, handling, transport, emission and disposal of hazardous substances must be in full compliance with local, State, and federal regulations. Hazardous materials are governed by regulations that require proper storage and handling, business and environmental management plans, spill contingency plans, employee and public noticing, and other emergency preventive and response measures to minimize the risk of accidental releases and related environmental effects. California Government Code Section 65850.2 requires that a final certificate of occupancy or its substantial equivalent cannot be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code Sections 25500 through 25520.

Additionally, 2040 General Plan policies and implementation programs would also help protect schools from hazardous emissions or the effects of hazardous materials. For example, Policies HAZ-5.1, HAZ-5.4, HAZ-5.6, and HAZ-12.3 protect schools from the effects of hazardous materials by directing the County to manage its own hazardous materials and provide regulatory oversight for discretionary development projects and all facilities that store, use, or handle hazardous materials. Policies HAZ-5.2, HAZ-5.5, HAZ-5.8, and HAZ-7.1 provide guidance for the location, operation, and management of discretionary developments, including oil and gas exploration and production sites to minimize the potential for affecting existing or future schools. Implementation Program J protects people and the environment from hazardous materials and waste by requiring all businesses that handle hazardous materials to prepare Hazardous Materials Business Plans and Hazardous Materials Response Plans to ensure that emergency response plans for potential inadvertent release of hazardous materials or waste are maintained and monitored. Implementation Programs K and L require County facilities that could be the source of a marine or onshore oil spill to share their prevention and response plans with regulatory and emergency agencies.

While the 2040 General Plan could accommodate future development with potential for hazardous materials usage or handling to be located within 0.25 mile of an existing or proposed school, compliance with federal and State regulations pertaining to hazardous wastes, as well as 2040 General Plan policies and implementation programs discussed above, would substantially lessen adverse public health and safety impacts. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.9-4: Create a Significant Hazard Due to Location on a Site Which is Included on a List of Hazardous Materials Sites

Sites contaminated with hazardous substances can potentially result in adverse human or environmental effects. Potential pathways of exposure to contaminants include direct ingestion of contaminated soils and/or ground water, inhalation of volatiles and fugitive dusts, potential explosion hazards associated with landfill gas, ingestion of contaminated groundwater caused by migration of chemicals through soil to an underlying potable aquifer, dermal absorption, ingestion of homegrown produce that has been contaminated via plant uptake, and migration of volatiles into basements and slabs. Potential exposure to contaminants could also occur to construction workers during site development and to the residents or workers that occupy the ultimate land use approved on the site.

Future development that could be accommodated under the land use designations of the 2040 General Plan is described in Impact 4.9-1. Some land use designations under the 2040 General Plan would be more likely to allow for activities that disturb existing hazardous material sites and increase potential pathways of exposure than others. For example, residential designations would have the potential to introduce human populations into areas that could have a history of contamination from nearby landfills, historic agricultural use, or other existing hazards. Construction activities could uncover buried underground storage tanks or other buried hazards.

As described in Section 11.5, "Hazardous Materials," of the Background Report, there were 300 hazardous materials sites in the county, as of November 2016 (Appendix B:11-64). Of that number, 27 were permitted underground storage tanks, 273 have undergone or are undergoing hazardous materials remediation, and one site contains a leaking underground storage tank (LUST) and is undergoing assessment (Appendix B 2018:11-64). Of the 273 sites that have or may undergo remediation, 162 have been designated as "Completed-Case Closed," including landfill sites and LUST sites (Appendix B:11-64). The Background Report also discusses ongoing hazardous waste cleanup sites in the county, including the Halaco Superfund site, Santa Susana Field Lab, USA Petrochem, and the Talley facility (Appendix B:11-69, 11-70).

As described in Section 23 of the ISAG, two constituents associated with rocket engine testing, perchlorate and TCE, have been detected in the southeast of the county at the Santa Susana Field Laboratory site. In August 2004, the Ventura County Board of Supervisors determined that to ensure consistent and complete assessment of specified development projects within two miles of former or current rocket engine testing facilities, applicants would be required to test for the constituents perchlorate and TCE.

The Ventura County Board of Supervisors further determined that groundwater is a more likely conduit for the spread of the identified toxic contaminants. As such, applicants for future discretionary development projects proposing to utilize groundwater in any capacity would be required to test the groundwater for perchlorate and TCE. The degree of potential threat of off-site contamination of soil has not been established, therefore, applicants for discretionary development consisting of residential general plan amendments, zone changes and subdivisions that increase density would be required to test the soil for perchlorate and TCE. If the constituents are found to be present in soil and/or groundwater, appropriate remediation actions would be required consistent with regulatory requirements for the land uses proposed.

Implementation of the 2040 General Plan could result in future development on or near a site identified in one of the regulatory databases, compiled pursuant to Government Code Section 65962.5, including those sites discussed above and identified in Section 11.5, "Hazardous Materials," of the Background Report. Federal and state regulations exist that prevent or reduce hazards to the public and environment from existing hazardous waste sites or hazardous substances release sites. These regulations include the Occupational Safety and Health Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Superfund Amendments and Reauthorization Act Title III; the Resource Conservation and Recovery Act; and the Toxic Substances Control Act. These regulations protect people and the environment through guidelines that require proper storage and handling, business and environmental management plans, spill contingency plans, employee and public noticing, and other emergency preventive and response measures to minimize the risk of accidental releases and related environmental effects. 2040 General Plan Policy HAZ-5.7 requires project applicants to indicate the presence of any hazardous wastes on a project site and demonstrate that the waste site is properly closed, pursuant to all applicable state and federal laws. Policies HAZ-5.2, HAZ-5.5, HAZ-5.8, and HAZ-7.1 provide guidance for the location, operation, and management of discretionary developments, including oil and gas exploration and production sites to minimize the potential for affecting people and the environment. While implementation of the 2040 General Plan could potentially accommodate future development on or near sites included on a list of hazardous waste sites or hazardous substances release sites, compliance with federal and state laws and regulations, as well as 2040 General Plan policies, would ensure that development would occur on sites that have been properly closed and remediated such that no remaining hazards from past contamination would remain. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.9-5: Locate Inconsistent Land Uses Within the Sphere of Influence of Any Airport, or Otherwise Result in a Safety Hazard to People Residing or Working Near an Airport

On the ground, aircraft hazards are generally produced by aircraft mishaps, either incident or accidents, which are associated with the operation of an aircraft. Ground-related incidents or accidents generally occur during take-off or landing. The most common type of take-off or landing accident is a runway incursion. A runway incursion is defined as an occurrence along the airport runway that creates a collision hazard or prevents an aircraft from taking off or landing. It can involve an aircraft, vehicle, person, or any other object that impacts an aircraft's ability to land or take-off. Hazards in the air jeopardize the safety of an airborne aircraft and expose passengers, pilots, and crews to danger.

Examples of hazards that interfere with air safety include tall structures, birds, glare-producing objects, or radio waves from communication centers. Essentially, there are two types of aviation-related safety concerns that affect land use near airports. The first is minimizing the severity of an aircraft accident by limiting the number of people and amount of property within airport hazard zones. The second is minimizing hazards in the air through restrictions on building heights and on uses that produce electronic or visual impairments to navigation or attract large numbers of birds.

As discussed in the Background Report, there are four airports in the county: two County-owned and operated airports at Camarillo and Oxnard, a private airport open to the public in Santa Paula, and the federally-operated Navy Base Ventura County (NBVC) Point Mugu (Appendix B:11-54). The *Airport Comprehensive Land Use Plan for Ventura County* (ALUCP) is intended to protect and promote the safety and welfare of people near the airports, as well as airport users, and applies to all four airports. The ALUCP includes noise compatibility standards, identifies safety zones and compatibility standards, and protects airspace through building height restrictions that guide nearby property owners and local jurisdictions in determining what types of proposed new land uses are appropriate around airports. Airport safety zones are any areas upon which an airport hazard might be created or established, if not prevented by regulations prohibiting certain uses or characteristics. The zones are based on Federal Aviation Regulations Part 77 (FAR Part 77), which provides guidance for the safe, efficient use and preservation of the navigable airspace. Airport safety zones identified in the ALUCP include Runway Protection Zone (RPZ), Outer Safety Zone (OSZ), Height Restriction Zone (HRZ), Traffic Pattern Zone (TPZ), and Extended Traffic pattern Zone (ETPZ). The ALUCP includes a table of uses and identifies whether they are acceptable, conditionally acceptable, or unacceptable land uses for each airport safety zone (Ventura County ALUC 2000:Table 6B).

The goal of the NBVC JLUS is to protect the viability of current and future operations, while simultaneously guiding community growth, sustaining the environmental and economic health of the region, and protecting public health, safety, and welfare (VCTC 2015:1-3). The JLUS includes the Air Installation Compatibility Use Zones (AICUZ) program, which is designed to protect the health, safety, and welfare of civilians and military personnel by encouraging land uses compatible with aircraft operations while protecting the public investment in the installation. The AICUZ program recommends compatibility measures for both the Navy and surrounding communities, and recommends land uses that are compatible with elevated sound level, accident potential zones, and obstruction clearance criteria associated with military airfield operations.

Future development that could be accommodated under the land use designations of the 2040 General Plan is described in Impact 4.9-1. The proposed land use designations of the 2040 General Plan would not introduce incompatible land uses within the airport safety zones. Some activities allowed to occur under the land use designations of the 2040 General Plan, such as future residential, commercial, and industrial development, would increase the number of people residing or working near an airport, who in turn could be exposed to aircraft hazards.

Federal and state regulations exist that prevent hazards to the public and environment near airports. These include FAA regulations, which establish safety standards for civil aviation, and the State Aeronautics Act, which establishes air safety standards (Caltrans 2011). The 2040 General Plan includes several policies aimed at reducing hazards associated with airports. For example, Policies CMT-5.1, CMT-5.3, CMT-5.5, and HAZ-6.4 direct the location of public or

private airports or airstrips to be located to minimize adverse safety effects on surrounding communities. Several policies require consistency with the ALUCP, including Policies HAZ-6.1, HAZ-6.2, HAZ-6.3, HAZ-6.5, and HAZ-6.8. Consistency with the ALUCP protects the public from adverse effects of aircraft noise, ensures that people and structures are not concentrated in areas susceptible to aircraft accidents, and ensures that no structures or activities encroach upon or adversely affect the use of navigable airspace (Ventura County ALUC 2000:1-2). For development within the Airport Safety Zones as identified in the ALUCP, Policy HAZ-6.6 requires recordation of a Notice of Aviation Hazard, which requires the grantor (i.e., property owner) to acknowledge the close proximity of the airport, present and future aircraft overflights, and aircraft noise such that the grantor accepts the present and future conditions.

Implementation of the 2040 General Plan could result in residential, commercial, or industrial development that is located near an airport. Because all future development would be required to comply with the land use and development standards, including the restrictions on uses within the airport safety zones, established in the adopted ALUCP, development within the immediate vicinity of an airport would not substantially increase the risk of people living or working in these areas to hazards associated with airport operations because incompatible uses would be restricted within the various airport safety zones. Further, compliance with federal and State laws and regulations regarding airport operations, as well as 2040 General Plan policies restricting incompatible land uses near airports, would ensure no land use compatibility impacts would occur. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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

As discussed in Section 11.3, “Wildfire Hazards,” of the Background Report, there are over 80 square miles of the county that are within the high fire hazard severity zone (FHSV) of State Responsibility Area (SRA) lands and more than 500 square miles in the very high FHSZ of Local Responsibility Area (LRA) lands (Appendix B:11-45). As part of the Ventura County Fire Code adopted on October 15, 2019, the County also defines Hazardous Fire Areas (HFAs) as a location within 500 feet of forest or brush, grass, or grain covered land, exclusive of small individual lots or parcels of land located outside of a brush, forest, or grass covered area. Also relevant to this discussion are areas of where wildlands are directly adjacent to urban development, known as wildland urban interface (WUI). Because high and very high FHSZs, HFAs, and WUIs generally overlap throughout the county, they are collectively referred to as “fire hazard areas” and all are considered in this analysis.

Although wildfires are natural processes necessary to the functioning of many ecosystems, a wildfire’s aftermath typically leaves land scorched and exposed. Until the land rehabilitates, the exposed soils may contribute to adverse environmental impacts including air and water pollution and unstable soils conditions such as mudslides, erosion, and debris flows. The end result of uncontrolled wildfire also includes debris from burned homes, some of which can be highly toxic, and can adversely affect the environment by polluting local waterways such as streams and rivers. Although natural conditions make wildfires common in the county, locating development adjacent to or within fire hazard areas could result in increased fire related risk to people and structures.

In addition to being located within fire hazard areas, economic and environmental barriers exist within the county that may challenge an adequate response to wildland fire events, such as was experienced during the Thomas Fire in December 2017 and the Hill and Woolsey Fires in November 2018. In the event of a major or multiple wildland fire events, adequate fire response staff may not be available within the county, requiring the need to enlist established mutual aid agreements with other neighboring fire agencies and the California Department of Forestry and Fire Protection. Additionally, response times for a wildland fire event may be inadequate due to insufficient access because of limited lane roads, inadequately maintained roads, and remote areas that need to be accessed. Fire response and access is discussed in Section 4.15, “Public Services and Recreation,” And as described therein, adequate fire facilities and personnel would be provided to meet increased demand for services as future development occurs. However, these services would likely be concentrated in the urban areas or developed communities of the county, where residents are located. Similarly, while sufficient water supplies and infrastructure, see Section 4.17, “Utilities,” would be in place to meet increased demand, these services and infrastructure would also be concentrated in urban and developed communities. Therefore, if a wildland fire were to occur in a more remote area of the county or at the urban-wildland interface, response times and infrastructure to combat the fires may be delayed.

The *2015 Ventura County Multi-Hazard Mitigation Plan* (MHMP) evaluates risks associated with agricultural, biological, climate change, dam failure inundation, drought, earthquake, flood, landslide, levee failure inundation, post-fire debris flow, tsunamis, wildfire, and winter storm hazards. The MHMP also identifies mitigation strategies. Implementation of the 2040 General Plan does not propose to change the plans or policies of the MHMP or any other emergency plan, although it is possible that future development implemented under the 2040 General Plan may require the updating of emergency plans. Construction activities associated with development occurring under the 2040 General Plan would not interfere with emergency plans and procedures as authorities would be notified in advance of construction and emergency routes would be maintained throughout construction activities.

Regarding wildfire hazards, mitigation strategies included in the MHMP include implementation of the following:

- ▶ a new vegetation management program that provides vegetation management services to elderly, disabled, or low-income property owners who lack the resources to remove flammable vegetation from around their homes;
- ▶ a fuel modification program for new construction by requiring builders and developers to submit their plans, complete with proposed fuel modification zones, to the local fire department for review and approval prior to beginning construction;
- ▶ a hazards fuel treatment program for areas that have been identified with overgrown/dead brush/trees to reduce the potential for tree-to-tree ignition. Ensure that a “maintenance now” component to provide continued fire resistance is part of the program; and
- ▶ post-fire debris flow hillslope and channel treatments.

The *Ventura County 2015 Emergency Operations Plan* (EOP) addresses the County's planned response to extraordinary situations and natural, human-cause, or technological disasters (Ventura County 2016). The EOP does not address normal day-to-day emergencies, nor does it address the established and routine procedures used in coping with such emergencies. Instead, the operational concepts reflected in the EOP focus on potential large-scale disasters that can generate unique situations requiring unusual emergency responses. The EOP is to be updated tri-annually to ensure that plan elements are valid and current. Implementation of the 2040 General Plan does not propose to change the plans or policies of the EOP or any other emergency plan, although it is anticipated that future development implemented under the 2040 General Plan would be reflected in the updating of the EOP. As the EOP provides structure for the handling of large-scale emergencies, it does not include specific guidance for wildfire events. Instead, the EOP provides guidance for the activation of various agencies and plans and describes the myriad mutual aid agreements.

Future development that could be accommodated under the land use designations of the 2040 General Plan is described in Impact 4.9-1. Where future development could interfere with an adopted emergency response or evacuation plan, such as the MHMP or EOP, it would result in an adverse physical effect to people or the environment by potentially increasing the loss of life and property in the event of a disaster. Development that includes large concentrations of people or special needs individuals, such as stadiums or hospitals, in an area with increased hazards, such as in fire hazard areas, could cause adverse effects related to the implementation of the MHMP. Failure to provide reasonable access for emergency equipment and evacuation of civilians can also result in the major loss of life, property, and natural resources. Additionally, certain tall structures can physically interfere with the implementation of an emergency response if the height of the structure or tower interferes with the ability of emergency air support services to carry out missions associated with an emergency response.

Federal, State, and local plans and regulations would reduce the risk of wildfire in the plan area by requiring vegetation management and compliance with applicable building codes that require access to adequate fire suppression infrastructure and specify the materials and construction methods for protection against exterior wildfire exposure. For example, pursuant to the Healthy Forest Restoration Act (Public Law 108–148), the Ventura County Fire Department has prepared and adopted the *Ventura County Community Wildfire Protection Plan*. This plan is intended to be used by communities to prioritize fuel reduction projects and reduce structural ignitability in at-risk communities. The Strategic Fire Plan for California establishes the levels of Statewide fire protection services for State Responsibility Area lands located in the county. These levels of service recognize other fire protection resources at the federal and local level that collectively provide a regional and Statewide emergency response capability. The State's Vegetation Management Program allows private landowners to enter into a contract with the California Department of Forestry and Fire Protection to use prescribed fire to accomplish a combination of fire protection and resource management goals. The main goals of the program are the reduction of conflagration fires, the optimization of soil and water productivity, and the protection and improvement of intrinsic floral and faunal values. Public Resources Code Section 4291 and Government Code Section 51182 require property owners in mountainous areas, forest-covered lands, or any land that is covered with flammable material to create, at minimum, a 100-foot defensible space (or to the property line) around their homes and other structures. Pursuant to VCFPD Ordinance 31, the Ventura County Fire Protection District Fire Hazard Reduction Program requires mandatory 100-feet of brush clearance around structures located in or adjacent to Hazardous Fire Areas.

Chapter 7A of the CFC, which was adopted with minor revisions as part of the Ventura County Fire Code, establishes minimum standards for the protection of life and property by increasing the ability of a building located in any FHSZ within SRAs or any WUI area to resist the intrusion of flames or burning embers projected by a vegetation fire and contributes to a systematic reduction in conflagration losses. Requirements of Chapter 7A include the use of noncombustible or ignition-resistant materials, ventilation, and the use of materials with specified minimum fire rating.

The 2040 General Plan also includes several policies related to wildfire and emergency response. For example, Policy HAZ-1.8 requires the County to collaborate with federal agencies to manage fuel lands on federally-owned or managed lands within the county. Policy HAZ-1.6 requires the County to develop and implement programs to educate the public about wildfire risk and protection strategies. Policies HAZ-1.1, HAZ-1.2, and HAZ-1.3 focus on wildfire prevention, including fire-resistant design and landscaping, defensible space clear zones, and controlled burning. Policies HAZ-1.4 and HAZ-1.5 discourage development of homes in very high FHSZs and requires recordation of a Notice of Fire Hazard for new discretionary entitlements in fire hazard areas, whether designated by Ventura County or CAL FIRE. Policy HAZ-1.7 requires Ventura County to maintain response plans and coordinate the management of resources following wildfire events. Policy HAZ-12.1 requires all new subdivisions to provide at least two points of access for emergency vehicles and resident evacuation.

Policy HAZ-12.2 requires the County to maintain and periodically update the Ventura County Emergency Operations Plan and the Ventura County Multi-Hazard Mitigation Plan. Independent of the 2040 General Plan the EOP is required to be updated every three years and MHMP every five years. In the event of a wildfire, people in the area of the wildfire would be subject to pollutant emissions. The size and location of the area in which people would be subject to pollutant emissions would depend on multiple factors such as the location and size of the wildfire, prevailing winds, and weather patterns. While smoke in the air is an obvious effect on people, wildfires emit substantial amounts of volatile and semi-volatile organic materials and nitrogen oxides that form ozone and organic particulate matter (NOAA 2019). Direct emissions of toxic pollutants could also affect first responders and local residents. In addition, the formation of other pollutants as the air is transported can lead to harmful exposures for populations in regions far away from the wildfires. One of the goals of the MHMP is to minimize loss of life and injury from wildfire through emergency preparedness, response, and recovery actions. As discussed above, Policy HAZ-12.2 requires periodic updates to the MHMP and EOP; which would help protect people from pollutant emissions during a wildfire event through prevention and quick, efficient response to wildfire events.

Implementation of the 2040 General Plan could accommodate future development in areas not currently developed. Future development in these areas would require new or upgraded roads and utility infrastructure. For future development in areas vulnerable to wildfire hazards, the installation of new or expanded roads in areas that are currently undeveloped would increase access and thereby human activities in these areas, which increase would exacerbate the risk of wildfire. The addition of more human activity, vehicles, and new utility infrastructure, such as overhead electrical lines, could exacerbate the risk of wildfire in currently undeveloped areas. Policies that would lessen the exacerbation of wildfire risk of from introducing human activity, new development, and new infrastructure to an area include Policy HAZ-1.6, which requires the County to develop and implement programs to educate the public about wildfire risk and

protection strategies. This policy is related to Implementation Program A, which directs the County to develop and implement education programs for wildfire resilience. By educating the public regarding wildfire risks and protection strategies, the County seeks to reduce the incidence of wildfire and mitigate wildfire impacts.

Policy HAZ-1.8 requires the County to collaborate with federal agencies to manage fuel lands on federally-owned or managed lands within the county. Managing fuel through activities such as vegetation removal and controlled burns, the County and other agencies would be directly reducing the chance of wildfire as well as fuels that would feed wildfires. Policies HAZ-1.1, HAZ-1.2, and HAZ-1.3 focus on wildfire prevention, including fire-resistant design and landscaping, defensible space clear zones, and controlled burning. The use of fire-resistant structural design, fire-resistant landscaping, and fuels modification helps reduce the risk of wildfire ignition as well as decrease the amount of fuels that feed wildfires. Defensible space requirements protect people and the environment by making structures less vulnerable to wildfire ignition and effects. Controlled burns reduce wildfire fuels, which can reduce the risk for wildfire ignition. These policies feed into Implementation Program B, which directs the County to collaborate with federal, State, and local agencies to identify areas vulnerable to wildfire hazards.

Policy HAZ 1.4 requires the County to require the recordation of a Notice of Fire Hazard for all new discretionary entitlements within fire hazard areas. By requiring this notice, prospective property owners would be informed that their property is in an area of wildfire danger and can make informed decisions regarding a purchase and the risks associated with the property. Pursuant to Policy HAZ 1.5, the County shall discourage the building of homes in very high fire severity zones. By discouraging development in these areas, the County seeks to reduce the incidence of wildfire and minimize wildfire effects. Policy HAZ 12.1 requires new residential subdivisions to have at least two access points for emergency vehicles. By ensuring adequate access for emergency vehicles, responders would be able to reach emergency areas in a timely manner, which could be critical in limiting the damage caused by emergent situations.

The aftermath of a wildfire could include conditions that could create downslope or downstream flooding or landslides, post-fire slope instability, or drainage changes. Policy HAZ-1.7 requires the County to maintain response plans and coordinate the management of resources following wildfire events. One of the goals of the MHMP is to minimize loss of life and injury from wildfire through emergency preparedness, response, and recovery actions. As discussed above, Policy HAZ-12.2 requires periodic updates to the MHMP and EOP, which would help reduce post-wildfire hazards by ensuring that the County's plans for handling large emergencies reflects current conditions to allow for efficient and safe operations during hazard or emergency events. These policies are related to Implementation Programs C and X which require the County to conduct post-wildfire assessments to identify vulnerabilities and periodically update emergency plans, respectively.

Implementation of the 2040 General Plan would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and exacerbate wildfire risk, because it would accommodate future development in or adjacent to high and very high FHSZs or Hazardous Fire Areas. By their designation, these areas are prone to wildland fires and have a higher potential for severe fire events. The County has adopted the MHMP, which identifies mitigation strategies to minimize fire hazard risks, has adopted the EOP that provides guidance for handling large-scale emergencies, discourages development in fire hazard areas, and requires development to implement a variety of best management practices and design

standards to ensure development is fire resistant. Nevertheless, future development would be allowed to occur at the urban-wildland interface, to increase access, human activity, and infrastructure in undeveloped areas of the county occurs and could result in the exacerbation of the potential for wildfires to occur. While Policy HAZ-12.2 requires periodic updates of emergency plans, there may be a gap between new development and plan update. Because implementation of the 2040 General Plan could result in development that exacerbates the potential for wildfires to occur and the resulting adverse environmental effects that are associated with these events, this impact would be **potentially significant**.

Mitigation Measures

The County has adopted and implemented programs to minimize wildfire risks including the MHMP. In addition, the *Ventura County CWPP* reduces hazardous fuels throughout the County and provide measures to reduce structural ignitability in at-risk communities. The Fire Hazard Reduction Program requires mandatory 100-feet of brush clearance around structures located in or adjacent to Hazardous Fire Areas. Many communities also have adopted their own emergency response plans. The 2040 General Plan includes a suite of policies and implementation programs that address a full spectrum of wildfire prevention standards for new development including vegetation management, fire suppression equipment, discouraging development in fire hazard areas, and education programs to prevent wildfires. Finally, existing federal and State building code standards, including the recently-adopted 2019 fire code, would require future development to be designed to minimize fire risk. Because the effects of a wildfire are not limited to development within high FHSZs but can easily spread to adjacent communities, any development in or adjacent to a designated FHSZs or near wildland areas is at risk for wildfire. While compliance with federal, State, and local requirements would limit risk, this risk cannot be completely eliminated. No other additional policies or programs are available that could eliminate the potential for wildfires or their environmental effects to occur because the only way to fully mitigate additional exposure of people to wildfire or exacerbation of wildfire risk is to prohibit all development in or near any areas that are at risk for wildfire. Based on the topography and vegetation characteristics of the county, very few if any such areas exist. Further, many existing developed areas already pose a wildfire risk because of their proximity to wildland areas. The County has undertaken a substantial effort to implement policies and implementation programs that would protect people and structures from the risk of wildfires while at the same time promoting the economic growth of the County. No additional feasible policies or implementation programs are available to reduce the risk of wildfire exposure, exacerbation, or resulting adverse environmental effects to less than significant.

Significance after Mitigation

This impact would be **significant and unavoidable**.

4.10 HYDROLOGY AND WATER QUALITY

This section evaluates the potential effects of implementing the 2040 General Plan on hydrology and water quality, including groundwater quantity and quality, surface water quantity and quality, hydraulic hazards, seiche and tsunami hazards, and flood control facilities and watercourses. As described in the “Approach to the Environmental Analysis” section, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments on the notice of preparation included concerns regarding establishing thresholds for analysis of hydrology and water quality. Comments on the notice of preparation also included concerns regarding groundwater infiltration, surface water quality, and flooding. These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

For additional discussion of impacts related to potential public health issues resulting from perchlorate and trichloroethylene (TCE) contamination of groundwater related to rocket engine testing in the county, refer to Section 4.9, “Hazards, Hazardous Materials and Wildfire.” For additional discussion of potential impacts to surface water quality related to erosion, refer to Section 4.7, “Geologic Hazards.”

4.10.1 Background Report Setting Updates

REGULATORY SETTING

The Background Report (Appendix B) accurately describes the regulatory setting for the purpose of this evaluation. Specifically, the pertinent regulations are provided in Section 10.2, “Legal and Regulatory Framework for Water Management,” of Chapter 10, “Water Resources.” In addition, Section 11.2, “Flood Hazards,” of Chapter 11, “Hazards and Safety” addresses regulations related to flood hazards. There is no additional information necessary to understand the potential hydrology and water quality impacts of the 2040 General Plan.

ENVIRONMENTAL SETTING

The Background Report (Appendix B) accurately describes the environmental setting for the purpose of this evaluation. Within Chapter 10, “Water Resources,” Section 10.1, “Major Findings,” addresses water quality and groundwater issues; Section 10.4, “Existing Conditions,” provides background information; and Section 10.5, “Trends and Future Conditions,” summarizes trends related to water supply. In Chapter 11, “Hazards and Safety,” Section 11.1, “Geologic and Seismic Hazards,” addresses seiche and Section 11.2, “Flood Hazards,” describes the existing potential for flooding. There is no additional information necessary to understand the potential hydrology and water quality impacts of the 2040 General Plan.

4.10.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

This program-level analysis evaluates hydrology and water quality conditions based on the location of where development would occur based on the proposed land use diagram for unincorporated Ventura County. Potential hydrology and water quality impacts are evaluated against existing conditions outlined in the Background Report. The evaluation of potential hydrological and water quality impacts is based on a review of documents pertaining to the plan area, including previous studies conducted for the County, topographic maps, previous EIRs, and published and unpublished hydrologic data and literature, as summarized in the Background Report.

In analyzing impacts to groundwater quantity, for the purposes of this program-level analysis, conditions of existing basins in the Background Report are outlined and compared against areas where future development under the 2040 General Plan is likely to occur to evaluate potential groundwater overdraft conditions. Pursuant to the methodology in the ISAG, potential surface water and groundwater quality impacts of discretionary projects Ventura County are typically compared to the water quality objectives in the applicable Basin Plan to determine whether the 2040 General Plan would degrade surface water and groundwater quality. Most of Ventura County falls within the *Basin Plan for the Coastal Watershed of Los Angeles and Ventura Counties* (LARWQCB 2019); however, the northwest corner of the county is within the *Water Quality Control Plan for the Tulare Lake Basin* (CVRWQCB 2018), and the western edge of the county is within the *Water Quality Control Plan for the Central Coast Basin* (CCRWQCB 2019). The analysis also considers potential stormwater quality impacts in accordance with the Municipal Separate Storm Sewer System (MS4) Permit or any other National Pollutant Discharge Elimination System (NPDES) Permit requirements.

The 2040 General Plan's impacts on surface water quantity and drainage are evaluated based on a review topographic maps, drainage studies performed for the County, and other geographic resources. The existing features and drainage are compared to the location of future development under the 2040 General Plan to determine if the project would increase or decrease the quantity of surface water or significantly alter drainage patterns. The analysis also evaluates, at the program-level, how anticipated changes in surface water flow would affect the beneficial uses listed in Section 2c-B of the ISAG.

To evaluate potential flooding impacts, the analysis includes a review of Federal Emergency Management Agency (FEMA) Digital Flood Insurance Rate Maps (DFIRMs); the Ventura County Floodplain Management Ordinance; Section 1612A, "Flood Loads," of the Ventura County Building Code adopted from the California Building Code (2019); Ventura County Flood Control District Design Manual, as amended; and the Watershed Protection District Hydrology Manual, as amended. Areas of potential flood hazards are compared against areas where future land use changes are likely to occur under the 2040 General Plan, to evaluate whether development would occur within flood hazard areas. The analysis also compares existing seiche and tsunami hazard areas with proposed land use and projected growth under the 2040 General Plan based on existing maps and reports.

In response to 2019 revisions to the State CEQA Guidelines (Public Resources Code Section 15126.2) and the 2015 California Supreme Court case, *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, impacts from exposure of a project to environmental hazards are not considered significant effects unless a project exacerbates the risks from such hazards. However, lead agencies retain the authority, separate and apart from CEQA, to include a review of potential impacts of the environment on a project when a project is undertaken by a lead agency, such as the 2040 General Plan. The 2040 General Plan is a comprehensive document that broadly establishes policy, not only related to the environment, but also related to public health and safety. Therefore, the analysis of seiche, tsunami, and flood hazards in this section considers whether the 2040 General Plan could cause or exacerbate impacts and whether the 2040 General Plan could result in impacts from exposure to such hazards. The discussion of potential impacts from exposure to seiche, tsunami, and flood hazards is provided for information purposes only and is neither required by CEQA nor subject to its requirements.

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on Ventura County’s adopted ISAG, which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project’s impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, ISAG Sections 17a, 17b, 29a and 31b are revised to condense the threshold discussions for purposes of the programmatic nature of the analysis. However, the analysis follows the methodologies outlined in ISAG. For additional discussion of impacts related to potential public health issues resulting from perchlorate and TCE, which could result from existing or former rocket engine testing in the county, refer to Section 4.9, “Hazards, Hazardous Materials, and Wildfire.” For additional discussion of impacts related to erosion, refer to Section 4.7, “Geologic Hazards.”

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant hydrology and water quality impact if it would:

- ▶ Directly or indirectly decrease the net quantity of groundwater in a groundwater basin that is overdrafted or create an overdrafted groundwater basin.
- ▶ Result in net groundwater extraction that causes overdraft in groundwater basins that are not overdrafted or are not in hydrologic continuity with an overdrafted basin.
- ▶ Result in any net increase in groundwater extraction from that groundwater basin and/or hydrologic unit, in areas where the groundwater basin and/or hydrologic unit condition is not well known or documented and there is evidence of overdraft based upon declining water levels in a well or wells.

- ▶ Degrade the quality of groundwater and cause groundwater to exceed groundwater quality objectives set by the applicable Basin Plan.
- ▶ Result in the use of groundwater, in any capacity, and would be located within 2 miles of the boundary of a site with documented groundwater contamination associated with a former or current test site for rocket engines.
- ▶ Increase surface water consumptive use (demand) in a fully appropriated stream reach, as designated by SWRCB, or where unappropriated surface water is unavailable.
- ▶ Increase surface water consumptive use (demand) including, diversion or dewatering downstream reaches, resulting in an adverse impact to one or more of the beneficial uses listed in the applicable Basin Plan.
- ▶ Degrade the quality of surface water, causing it to exceed the water quality objectives of the applicable Basin Plan.
- ▶ Cause stormwater quality to exceed water quality objectives or standards in the applicable MS4 Permit or any other NPDES Permits.
- ▶ Be located within 10 to 20 feet of vertical elevation from an enclosed body of water such as a lake or reservoir, resulting in a seiche hazard.
- ▶ Locate development in a mapped area of tsunami hazard.
- ▶ Result in erosion, siltation, or flooding hazards.
- ▶ Be located in a mapped area of flood hazards.
- ▶ Adversely affect flood control facilities and watercourses by obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water, resulting in exposing adjacent property and the community to increased risk of flood hazards, through activities such as:
 - Reducing the capacity of flood control facilities and watercourses. This includes the planting of any vegetation within the watercourse or on the banks thereof;
 - Eroding watercourse bed and banks due to high velocities, changes in adjacent land use, encroachments into the channel such as bridges, and loading the top of the channel embankment with structures;
 - Depositing any material of any kind in a watercourse; and
 - Placing a structure that encroaches on a flood control facility or that does not have sufficient setback from a watercourse.
- ▶ Result in conflicts with the Ventura County Watershed Protection District's (WPD) Comprehensive Plan through potential deposition of sediment and debris materials within existing channels and allied obstruction of flow; overflow of channels during design storm conditions; and increased runoff and the effects on Areas of Special Flood Hazard and regulatory channels both on- and off-site.

- ▶ Result in noncompliance with building design and construction standards regulating flow to and from natural and man-made drainage channels.
- ▶ Result in noncompliance with applicable requirements for onsite wastewater treatment systems (OWTS) .

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to hydrology and water quality and, specifically, the thresholds of significance identified above, include the following:

Public Facilities, Services, and Infrastructure Element

- ▶ **Policy PFS-6.1: Flood Control and Drainage Facilities Required for Discretionary Development.** The County shall require discretionary development to provide flood control and drainage facilities, as deemed necessary by the County Public Works Agency and Watershed Protection District. The County shall also require discretionary development to fund improvements to existing flood control facilities necessitated by or required by the development. (RDR) *[Source: Existing GPP Policy 4.6.2.2, modified]*
- ▶ **Policy PFS-6.2: Multi-Purpose Flood Control Projects.** The County shall encourage the integration of design features into flood control projects, when feasible: to address resource conservation and restoration and preservation of natural riparian habitats, to provide groundwater recharge, to enhance water quality, to protect scenic vistas, and to incorporate recreational areas or opportunities. (RDR, SO) *[Source: New Policy]*
- ▶ **Policy PFS-6.5: Stormwater Drainage Facilities.** The County shall require that stormwater drainage facilities are properly designed, sited, constructed, and maintained to efficiently capture and convey runoff for flood protection and groundwater recharge. (RDR) *[Source: New Policy]*
- ▶ **Policy PFS-6.6: Natural Drainage Courses.** The County shall retain drainage courses in their natural state to the extent feasible. (SO) *[Source: Existing Oak Park Area Plan Policy 2.2.2.3, modified]*
- ▶ **Policy PFS-6.7: Flood Control and Beach Sand Nourishment.** The County shall include beach sand nourishment as an important factor in the design and maintenance of flood control facilities. (SO) *[New Policy]*

Conservation and Open Space Element

- ▶ **Policy COS-2.10: Saltwater Intrusion.** The County shall work with Federal, State, and local jurisdictions, agencies, and organizations to monitor saltwater intrusion and take proactive steps to reduce intrusion, including:
 - working to maintain and restore coastal wetlands buffers;
 - enhancing groundwater management to prevent excessive pumping in order to restore groundwater levels needed to reduce saltwater intrusion; and
 - implementing mitigation measures to prevent saltwater intrusion into estuaries and groundwater basins including, but not limited to, implementation of reactive barriers and use of pumps to divert saltwater. (PSR, IGC, JP) *[Source: New Policy, OPR Sea-Level Rise Guidance]*

Hazards and Safety Element

- ▶ **Policy HAZ-2.1: Principal Floodway Purpose.** The County should limit land use in the regulatory floodway, as identified in the Ventura County Flood Plain Management Ordinance, limited to open space, agriculture, or passive to low intensity recreational uses, subject to the approval of the County Public Works Agency. The floodway's principal use should be maintained for safely conveying floodwater away from people and property while protecting ecological functions of the river. (RDR) *[Source: Existing GPP Policy 2.10.2.1, modified]*
- ▶ **Policy HAZ-2.8: Natural Flood Protection Solutions.** The County shall consider natural, or nature-based flood protection measures for discretionary development or County-initiated development, when feasible. (PSR, IGC) *[Source: New Policy, OPR Sea-Level Rise Guidance]*
- ▶ **Policy HAZ-4.12: Slope Drainage.** Drainage plans that direct runoff and drainage away from slopes shall be required for construction in hillside areas. (RDR) *[Source: Existing GPP Policy 2.7.2.3]*
- ▶ **Policy HAZ-4.14: Development in Seiche Hazard Areas.** The County shall not allow development in potential seiche hazard areas unless a geotechnical engineering investigation is performed and appropriate and sufficient safeguards, based on this investigation, are incorporated into the project design. (RDR) *[Source: Existing GPP Policy 2.5.2.2, modified]*
- ▶ **Policy HAZ-4.18: Preparation of Plans in Seiche Hazard Areas.** The County shall consider Seiche Hazard Areas during the preparation of regional and Area Plans and special studies and be used to guide future investigations of the hazard. (RDR) *[Source: Existing GPP Policy 2.5.2.1, modified]*

Implementation Programs

- ▶ **Program E: Update Tsunami Information.** The County shall update planning documents, maps, and the Operational Area Tsunami Evacuation Plan, when necessary to reflect the most current tsunami information, and identify actions necessary to mitigate property damage, and maintain evacuation readiness. (MPSP, SO) *[Source: New Program, NBVC JLUS Strategy MAR-3A]*
- ▶ **Program I: Estuaries, Wetlands, and Groundwater Basins Resilience.** The County shall coordinate with regional stakeholders to assess vulnerabilities from the effects of, and opportunities to enhance the resiliency to, sea level rise on estuaries, wetlands, and groundwater basins. This assessment should consider factors that influence the conditions of an estuary or wetland, including sea level rise, rainfall, surface heat budget, wind, and ocean acidification. *[Source: New Program]*

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.10-1: Directly or Indirectly Decrease the Net Quantity of Groundwater in a Groundwater Basin That Is Overdrafted or Create an Overdrafted Groundwater Basin

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of

incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

As described in Section 10, "Existing Conditions," in the Background Report, several groundwater basins exist within the county. The Sustainable Groundwater Management Act (SGMA) provides a framework for sustainable management of groundwater supplies by local authorities, with the potential for State intervention, if necessary. SGMA requires the formation of local groundwater sustainability agencies (GSAs) for high- or medium-priority basins, which include critically overdrafted basins. For critically overdrafted high- or medium-priority basins, GSAs are required to create and adopt groundwater sustainability plans (GSPs) by January 31, 2020. GSAs will require an assessment of the condition of groundwater basins, managing groundwater demand, and undertaking groundwater recharge projects to achieve long-term sustainability (Appendix B). As defined in SGMA, a basin is subject to critical overdraft when continuation of present water management practices would probably result in significant adverse overdraft-related environmental, social, or economic impacts (Appendix B). Three overdrafted basins are present in the county, as identified by the California Department of Water Resources (DWR). These include the Cuyama Groundwater Basin¹, Pleasant Valley Groundwater Basin, and the Oxnard Plain Basin. All three basins provide water potable and agricultural water supplies.

Groundwater from the Cuyama Groundwater Basin is primarily used to serve populations outside of the plan area, as well as some agricultural uses throughout the county (Appendix B).

¹ Although the basin as a whole is considered to be in overdraft, the U.S. Geological Survey estimates the portion in Ventura County not to be in overdraft (Appendix B).

The area overlaying the Cuyama Groundwater Basin would be designated as Open Space under the 2040 General Plan, which allows for development of one dwelling unit per approximately 10 acres (or 20 acres if the Open Space designation is contiguous with Agricultural land use). Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells.

The Pleasant Valley Groundwater Basin is located within the City of Camarillo and in the unincorporated area surrounding the City of Camarillo and provides water supply to various areas of the county for a variety of uses, including residential, municipal, industrial, and agricultural (Fox Canyon Groundwater Management Agency 2019a). Land use designations under the 2040 General Plan in the areas overlaying the Pleasant Valley Groundwater Basin would include Agricultural, Very Low Density Residential, and limited Rural and Low-Density Residential designations. The Agricultural land use designation allows for development of one dwelling unit per 40 acres, the Very Low Density Residential land use designation allows for four dwelling units per acre, the Rural land use designations allow for one dwelling unit per 2 acres, and the Low Density Residential allows for six dwelling units per acre.

The Oxnard Plain Groundwater Basin supplies large amounts of groundwater for municipal users including the City of Oxnard, the county's largest city, as well as more than half the county's agricultural industry (Appendix B). The Oxnard Plain Groundwater Basin is in the middle-south portion of the county and is overlaid by the City of Port Hueneme and the City of Oxnard, as well as unincorporated areas of the county surrounding these cities. Land use designations under the 2040 General Plan in the areas overlaying the Oxnard Plain Groundwater Basin include largely Agricultural uses, but also include the Naval Base Ventura County, which is designated as State or Federal Facility on the proposed land use diagram. In addition, a few areas outside of the City of Port Hueneme are proposed to be designated Commercial, ECU²-Open Space, and Residential Beach. Commercial land use designations under the 2040 General Plan would allow for 60 percent lot coverage, ECU-Open Space would allow for one dwelling unit per parcel, while Residential Beach would allow for 36 dwelling units per acre. However, Residential Beach areas would be limited to a small land area (approximately 185 acres for the entire planning area, although the majority of which would be located within the Oxnard Plain Groundwater Basin).

The Cuyama Groundwater Basin GSP is within the jurisdiction of the Cuyama Valley GSA, which includes the counties of Ventura, San Luis Obispo, and Kern, as well as the Santa Barbara County Water Agency, Cuyama Basin Water District, and Cuyama Community Services District. The Final Cuyama Valley Groundwater Basin GSP was released to the public in June 2019. The Cuyama Valley Groundwater Basin GSP incorporates monitoring methods, sustainability thresholds, and projects and management actions to ensure sustainability of the basin (Cuyama Basin Groundwater Sustainability Agency 2019). Both Pleasant Valley Groundwater Basin and the Oxnard Plain Groundwater Basin are under the jurisdiction of the Fox Canyon Groundwater Management Agency. The Draft GSPs for the Oxnard Subbasin and the Pleasant Valley Basin were both released to the public in July 2019 (Fox Canyon Groundwater Management Agency 2019a; Fox Canyon Groundwater Management Agency 2019b). Similar to the Cuyama Valley Groundwater Basin GSP, the Draft GSPs for the Oxnard Subbasin and the Pleasant Valley Basins include sustainable management criteria, monitoring networks and project and management actions to ensure sustainability of these basins (Fox Canyon Groundwater

² The acronym "ECU-" preceding a designation name refers to land use designations that apply only within the boundaries of an Existing Community.

Management Agency 2019a; Fox Canyon Groundwater Management Agency 2019b). Future development under the 2040 General Plan would be required to be consistent with these GSPs. The 2040 General Plan includes policies such as Policy COS-2.10, which requires the County to enhance groundwater management to prevent excessive pumping and reduce saltwater intrusion. Further, Program I, included in Section 7.13 of the 2040 General Plan, requires coordination with regional stakeholders regarding effects on, and opportunities to enhance, the resiliency of groundwater basins.

County Ordinance 4468 prohibits new wells for the extraction of groundwater in many groundwater basins. This prohibition applies to property that is both located in groundwater basins within the Ventura River Watershed, Santa Clara River Watershed, Cuyama River Watershed, or portion of the Calleguas Creek Watershed that includes the Oxnard Plain Basin, Pleasant Valley Basin, Los Posas Valley Basin, and Arroyo Santa Rosa Basin and within groundwater basins designated by the California Department of Water Resources (DWR) as High or Medium Priority Basins on or before January 31, 2015, pursuant to Water Code Section 10722.4, or in the event DWR did not make a priority designation by January 31, 2015, within groundwater basins designated as High or Medium Priority under DWR's California Statewide Groundwater Elevation Monitoring Program (CASGEM) Groundwater Basin Prioritization until a priority designation has been made pursuant to Water Code Section 10722.4.

Development that occurs over the planning period is anticipated to both increase water demand and introduce impervious features with potential to impair groundwater recharge. Through compliance with GSPs and Ordinance 4468, which prohibits new wells for the extraction of groundwater in many groundwater basins, and 2040 General Plan Policy COS-2.10, the 2040 General Plan would not directly or indirectly decrease the net quantity of groundwater in a groundwater basin that is overdrafted or create an overdrafted groundwater basin. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-2: Result in Net Groundwater Extraction That Causes Overdrafted Basins in Groundwater Basins That Are Not Overdrafted or Are Not in Hydrologic Continuity with an Overdrafted Basin

Aside from the overdrafted groundwater basins discussed under Impact 4.10-1, above, several additional groundwater basins are present throughout the county. These include the Ojai Valley Groundwater Basin, Simi Valley Groundwater Basin, and Piru Groundwater Basin. As discussed in Section 4.17, "Utilities," future development under the 2040 General Plan would increase demand for water supply. Water supply sources in the county include water from local lakes and reservoirs as well as groundwater, which is currently estimated to provide 67 percent of the water supply in the plan area (Appendix B).

However, as discussed under Impact 4.10-1, above, SGMA requires the formation of local GSAs for high- or medium-priority basins and preparation of GSPs to ensure sustainability of groundwater in these basins. Seven basins in the county are designated as medium priority, which include Ojai Valley, Upper Ventura River, Cuyama Valley, Arroyo Santa Rosa Valley, Mound, Santa Paula, and Filmore Groundwater Basins. Four high priority basins are also located within the county. These include Oxnard Plain, Pleasant Valley, Las Posas, and Piru Groundwater Basins. Two of the four high-priority basins (Oxnard Plain and Pleasant Valley

Basins) and one medium-priority basin (Cuyama Valley Basin) are also considered to be in critical overdraft and have been analyzed above, under Impact 4.10-1. As defined in SGMA, a basin is subject to critical overdraft when continuation of present water management practices would probably result in significant adverse overdraft-related environmental, social, or economic impacts such as persistent lowering of groundwater levels, drying of wells, reductions in groundwater storage, sea water intrusion, degradation of water quality, land subsidence, and reduction of water in streams and lakes (Appendix B). GSPs for all 11 basins must be completed and adopted by their respective GSA by January 31, 2022. Further, all high- and medium-priority groundwater basins must achieve sustainability within 20 years of GSP adoption (Appendix B). Through compliance with SGMA and adopted GSPs for these basins, the 2040 General Plan would not result in net groundwater extraction that results in the overdrafting of the basins or associated hydrologic units. Further, until adoption of these GSPs, Ordinance 4468 prohibits the installation of new groundwater wells in the unincorporated county for many groundwater basins. These prohibitions would not be removed until such time that GSAs are formed and GSPs are prepared in compliance with the SGMA (Appendix B). Lastly, the 2040 General Plan includes Policy COS-2.10, which requires that the County enhance groundwater management to prevent excessive pumping in coastal aquifers. Because new groundwater wells are restricted throughout the county until GSPs for each high priority basin are adopted, and because SGMA would manage groundwater resources in the future, development under the 2040 General Plan would not result in net groundwater extraction that results in overdrafting the groundwater basins or associated hydrologic units. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-3: Result in Any Increase in Groundwater Extraction in Areas Where the Groundwater Basin and/or Hydrologic Unit Condition Is Not Well Known or Documented and There Is Evidence of Overdraft Based upon Declining Water Levels in a Well or Wells
As discussed under Impacts 4.10-1 and 4.10-2, above, several groundwater basins are located throughout the county. Through compliance with SGMA and adopted GSPs for these basins, the 2040 General Plan would not result in groundwater extraction that results in the overdrafting of groundwater basins. Because of the programmatic nature of the 2040 General Plan, a precise, project-level analysis of impacts to underlying groundwater basins of any future development under the 2040 General Plan cannot be performed at this time. Also as discussed above, SGMA requires the evaluation and management of groundwater basins. In the future there will be more definitive information about groundwater basin conditions because of SGMA requirements. Therefore, it is anticipated that there will be less reliance on anecdotal evidence of overdraft, such as declining water levels in nearby wells, in the future. Currently, however, indirect indicators provide insight on areas of the county that may be incapable of supporting additional groundwater extraction. For example, there are areas of land subsidence (i.e., in the Oxnard Plain area) that have been attributed to a combination of tectonic movement, hydrocarbon extraction, and groundwater pumping, as discussed further in Section 4.7, "Geologic Hazards."

However, it is reasonable to assume that all future development subject to the County's discretionary approval during the plan horizon of the 2040 General Plan would be analyzed for potential impacts according to CEQA. This is currently guided by the County's ISAG. Section 2a of the ISAG provides specific methodology to determine whether a project would result in

any increase in groundwater extraction from a groundwater basin and/or hydrologic unit, and whether adverse impacts would occur. Project-level study of the groundwater conditions may be conducted to support this analysis.

Further, County Ordinance 4468 prohibits new water wells in the unincorporated county in many groundwater basins, limiting groundwater extraction within the county. These prohibitions would not be removed until GSAs are formed and have completed GSPs per the SGMA (Appendix B). The regulatory framework established by SGMA sets forth requirements under which groundwater basins will be characterized, monitored, and regulated. This is anticipated to substantially reduce the uncertainty of consequences associated with groundwater extraction. Further, because any additional groundwater extraction above existing conditions is limited by County Ordinance 4468, and because any future discretionary projects would be required to perform project-specific CEQA analysis that would include analysis of whether the project is proposed in an area where there is evidence of overdraft and little known about the groundwater condition, implementation of the 2040 General Plan would not result in a net increase in groundwater extraction that would adversely affect the underlying groundwater basins. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-4: Degrade the Quality of Groundwater and Cause Groundwater to Exceed Groundwater Quality Objectives Set by the Applicable Basin Plan

Pursuant to ISAG, potential effects on groundwater quality are determined in relationship to the objectives and beneficial uses in the applicable Basin Plan to ensure consistent and complete assessment of potential impacts. The Basin Plans contain the regulations adopted by the RWQCB to control the discharge of waste and other controllable factors affecting the quality of waters of the State. The Basin Plans, as amended periodically, establish the beneficial uses of water within the region; the water quality objectives necessary to protect those uses, including an antidegradation policy; the prohibitions, policies, and action plans, by which protections are implemented; and the monitoring, which is conducted to ensure attainment of water quality standards. The Basin Plan is adopted by the RWQCB and approved by the State Water Resources Control Board, and the Office of Administrative Law. The United States Environmental Protection Agency approves the water quality standards contained in the Basin Plan, as required by the Clean Water Act. The Basin Plan is used as a regulatory tool by the RWQCB. RWQCB orders cite the Basin Plan's water quality standards, prohibitions, and other programs of implementation applicable to a particular discharge or category of discharge.

The types of land uses that could be accommodated by the 2040 General Plan could generate new sources of pollution, which could enter groundwater from point sources (e.g., an industrial site or faulty septic system) or from nonpoint sources over a broad area (e.g., infiltration of water contaminated with pesticides in agricultural areas). During construction activities, materials such as gasoline, diesel fuel, lubricating oils, grease, solvents, and paint, could be accidentally spilled. Where the depth to groundwater is shallow or excavation has exposed the water table, such upset conditions could affect the groundwater table. As indicated above, most of the unincorporated county would remain designated as either Open Space or Agriculture under the 2040 General Plan. Specific land uses in these areas could include animal husbandry and oil and gas exploration and production. Following buildout pursuant to the 2040 General Plan, these uses have the potential to adversely affect groundwater quality if not properly managed.

As discussed in Section 10.4, “Existing Conditions,” of the Background Report, the *Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (LARWQCB 2019) provides detail on beneficial uses for specific Ventura River reaches. Objectives related to groundwater outlined in this Basin Plan include ensuring maintenance of healthy levels of ammonia, nitrates, bacteria such as coliform organisms, chemical constituents and radionuclides, inorganic constituents, and nitrogen. Further, groundwater cannot have taste or contain odor-producing substances in concentrations that cause a nuisance or adversely affect beneficial uses. All waste discharges, including discharges to groundwater, are subject to California Water Code Sections 13260 and 13263 and are issued Waste Discharge Requirements (WDRs) by the RWQCB. Water discharges are also subject to California Code of Regulations Title 23 (Los Angeles Regional Water Quality Control Board 2019). Compliance with applicable regulations (e.g., Municipal Permit, Construction General Permit, Stormwater Pollution Prevention Plans) governing the quality of groundwater would ensure that future development under the 2040 General Plan would not degrade the quality of groundwater and cause groundwater to exceed groundwater quality objectives set by the Basin Plans. The Low Impact Development designs and Best Management Practices required by existing federal and State laws, regulations, and permits would protect the quality of groundwater and promote infiltration of treated runoff to contribute to the replenishment of groundwater resources.

Various other groundwater quality regulations exist throughout the county. For instance, the County Subdivision Ordinance includes provisions meant to ensure adequate provision of water, to protect water supply, and to protect surface water and groundwater quality. Provisions to protect groundwater quality include requiring that water courses and existing or abandoned water wells be identified on tentative maps and requiring a description of the proposed method and plan for sewage disposal for each proposed lot (Appendix B). Further, Ordinance 4468 would protect groundwater quality by regulating the construction, maintenance, operation, use, repair, modification, and destruction of groundwater wells and engineering test holes in such a manner that the groundwater of the county will not be contaminated or polluted. Oil and gas development would be required to comply with Section 8107-5.6 of the Non-Coastal Zoning Ordinance, which requires that permittees for all oil and gas development projects submit a plan to the County for controlling oil spillage and preventing saline or other polluting or contaminating substances from reaching surface or subsurface waters, consistent with local, State, and federal regulations (Ventura County 2019a). Similarly, oil and gas development within the Coastal Zone must comply with Section 8175-5.7.8 of the Coastal Zoning Ordinance, which requires that any oil, produced water, drilling fluids, cuttings, and other contaminant associated with the drilling, production, storage, and transport of oil is contained on the site unless properly transported off-site or injected into a well, treated, or reused in an approved manner. All appropriate permits shall be secured and the permittee shall also submit a plan for preventing oil spillage and prevent saline or other polluting or contaminating substances from reaching subsurface waters (Ventura County 2017). Lastly, all oil and gas drilling activities are subject to the California Division of Oil, Gas, and Geothermal Resources (DOGGR) which outlines additional water quality requirements for oil, gas, and geothermal projects (Department of Conservation 2019). Further, 2040 General Plan Policy COS-2.10 requires monitoring of saltwater intrusion into groundwater basins.

As stated above, there are numerous regulations and requirements in place to protect groundwater quality. Compliance with these requirements would eliminate or substantially lessen the generation of pollutants that could degrade groundwater quality and exceed groundwater quality objectives of applicable Basin Plans. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-5: Result in the Use of Groundwater, in Any Capacity, and Would Be Located within 2 Miles of the Boundary of a Former or Current Test Site for Rocket Engines

As discussed under Impacts 4.10-1 through 4.10-3, above, Ordinance 4468 generally prohibits new water wells in the unincorporated county in many groundwater basins (Appendix B). Groundwater resources would be managed in a manner consistent with the SGMA, which provides guidance for sustainable groundwater management, including best management practices.

As discussed in Impact 4.9-2, in Section 4.9, “Hazards, Hazardous Materials and Wildfire,” two constituents associated with rocket engine testing, perchlorate and TCE, have been detected in southeast Ventura County at the Santa Susana Field Laboratory site. This location is a 2,850-acre site located to the southwest of the City of Simi Valley, that was previously utilized for research, development, and testing of rocket engines (Appendix B). No development is proposed to occur at this site as a result of the 2040 General Plan. This area and the areas that surround it would be designated as Open Space under the 2040 General Plan, which limits development to one dwelling unit per 10 acres, or 20 acres if contiguous with Agricultural land use. Permissible uses in Open Space include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas exploration and production. Further, if discretionary development in this limited area were to occur, the construction of any new groundwater wells associated with the proposal would be subject to County review, which would assess the location of the proposal relative to known sites of groundwater contamination. Also, as described in Impact 4.9-2 applicants for all discretionary projects proposing to utilize groundwater in any capacity that are located within 2 miles of the boundary of a former or current test site for rocket engines are required to test the groundwater for perchlorate and TCE. Therefore, the 2040 General Plan is not expected to result in the pumping of groundwater within 2 miles of areas used for rocket testing. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-6: Increase Surface Water Consumptive Use (Demand) in a Fully Appropriated Stream Reach, as Designated by SWRCB, or Where Unappropriated Surface Water Is Unavailable

Fully appropriated streams within the county include the Cuyama River, Piru Creek, Santa Ana Creek, Ventura River, Santa Clara River, San Antonio Creek, Thatcher Creek, and Reeves Creek. Lake Casitas and Lake Piru are also part of the fully appropriated stream reach, as designated by the State Water Resource Control Board (SWRCB) (SWRCB 1991). Fully appropriated stream systems (FASS) are those where there is insufficient supply, during specified months or year-round, for new water right applications. Pursuant to SWRCB Order WR 98-08, the SWRCB is precluded from accepting applications to appropriate water for consumptive use from a fully appropriated stream reach (SWRCB 1998).

Water supply sources in the county include water from local lakes and reservoirs, groundwater, and the State Water Project. Recently, because of decreased supply of groundwater and reservoirs due to drought, the County began purchasing water from Lake Casitas (Appendix B). Although project-specific details of future development under the 2040 General Plan are not known, it is assumed that water supply sources for future development could include the same sources of supply as existing conditions. Population growth is forecast to occur during the planning horizon of the 2040 General Plan, which would result in increased development and, thus, increased water demand. Depending on the conditions present (e.g., normal or dry year conditions), future development may rely on Lake Casitas to meet its water supply demands. Lake Casitas is part of a fully appropriated stream reach and is managed by the Casitas Municipal Water District (CMWD). The CMWD Urban Water Management Plan/Agricultural Water Management Plan (UWMP/AWMP) identifies and evaluates the reliability and quantity of available water supply sources. As discussed in the UWMP/AWMP, projected demand within CMWD would equal supply under a multiple dry year condition through 2040 (Casitas Municipal Water District 2016). Therefore, while Lake Casitas is part of a fully appropriated stream reach, CMWD has identified that sufficient water supplies are available to meet long-term projected growth within its service area. This CMWD assumption is based on the Southern California Association of Government's population estimates for the period between 2020 and 2040. Therefore, the population projections accommodated by the 2040 General Plan would be consistent with this plan.

As discussed further in Section 4.17, "Utilities," the Ventura County Waterworks Manual includes standards to address water availability for land development projects. Per Section 1.3.6 of the manual, water purveyors that serve or plan to serve any land development project subject to any approval by the County or a County-dependent special district must prepare a water availability letter declaring that the purveyor's water system has the necessary water capacity available to supply the domestic and firefighting requirements for the project or service area (PWA 2014). Through this process, a study of available water supply would be conducted that would determine whether there is sufficient water available without the presumed use of water from a fully appropriated stream reach.

Therefore, all future discretionary development that would occur in these areas would be required, to identify sources of water supply, including groundwater withdrawal or water allocation from a local water district. As described above, existing State regulations preclude the SWRCB from accepting applications for consumptive use in fully appropriated stream reaches. Where surface water is diverted for such use as agriculture, it is anticipated that this would be consistent with established water rights. As discussed under Impact 4.17-4, policies included in the 2040 General Plan also encourage various planning efforts, including: sustainable water supply plans for water suppliers and groundwater agencies (WR-1.1); development of a diverse water supply portfolio (WR-1.3); participation in regional planning committees to coordinate planning efforts for water and land use (WR-1.5); and, continued support and participation with the Watershed Coalition Ventura County in implementing and updating the Integrated Regional Water Management Plan (WR-1.10).

Because the appropriation of water occurs at the State level, the County cannot authorize additional consumptive use of these waters. Further, discretionary development is required to demonstrate provision of access to adequate water supply through the permit application process. Therefore, the 2040 General Plan would not increase demand for surface water consumptive use from a fully appropriated stream reach, or where unappropriated surface water is unavailable. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-7: Increase Surface Water Consumptive Use (Demand) Including Diversion or Dewatering Downstream Reaches, Resulting in an Adverse Impact on One or More of the Beneficial Uses Listed in the Applicable Basin Plan

As discussed under Impact 4.10-6, above, the County's water supply currently comes from lakes and reservoirs, including Lake Casitas, groundwater, and the State Water Project (Appendix B). Although project-specific details of future development under the 2040 General Plan are not known, it is assumed that water supply sources for future development would use the same sources of supply as existing conditions. Demand for water supply under implementation of the 2040 General Plan is described further in Impact 4.17-4 in Section 4.17, "Utilities."

As described above, the Basin Plans identify the beneficial uses of the waterbodies regulated by the plan. The Basin Plans are adopted by the applicable RWQCB, approved by the State Water Resources Control Board and the Office of Administrative Law, and used as a regulatory tool by the RWQCB. Beneficial uses of the *Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (LARWQCB 2019), which covers the majority of the plan area, include agricultural supply, industrial process supply, groundwater recharge, freshwater replenishment, navigation, and hydropower generation.

Future development under the 2040 General Plan would increase water demand. For the plan area, demand related to population growth would be approximately 491,900 gallons per day (approximately 550 acre feet per year), assuming a use rate of 120 gallons per day per capita. Increases to industrial and commercial areas would also increase water demand in the county. However, as discussed above under Impact 4.10-7, water purveyors that serve or plan to serve any land development project subject to approval by the County or a County-dependent special district must prepare a water availability letter declaring that the purveyor's water system has the necessary water capacity available to supply the domestic and firefighting requirements for the project or service area (PWA 2014). This determination would be consistent with State law, including consistency with the beneficial uses of the waterbodies, as identified in the applicable Basin Plan.

In the case of water purveyors classified as Urban Water Suppliers under the Urban Water Management Planning Act, the adoption of a current UWMP that has been accepted by the State Department of Water Resources, the County relies on the UWMP to verify water availability. These UWMPs would ensure that water supplies are properly managed and, thus, would not result in adverse effects to beneficial uses listed in the applicable Basin Plans. Further, State and local regulations require water rights for stream diversion. Therefore, through compliance with existing federal and State regulations, the 2040 General Plan would not result in diversion or dewatering downstream reaches that would result in an adverse impact on one or more of the beneficial uses listed in the Basin Plans. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-8: Degrade the Quality of Surface Water, Causing It to Exceed the Water Quality Objectives Contained in the Applicable Basin Plan

Future development under the 2040 General Plan has the potential to result in direct and indirect impacts on surface water quality. Construction materials, such as gasoline, diesel fuel, lubricating oils, grease, solvents, and paint, would be brought on various project sites and could result in accidental spills or increase the pollutant load in runoff that could adversely affect surface water quality. Development under the 2040 General Plan would increase impervious surfaces. Increased rates of surface water runoff associated with new impervious surfaces could promote increased erosion and sedimentation or other stormwater contamination and adversely affect surface water quality. The main sources of long-term stormwater pollution from development are roads, automobiles, landscaping, industrial activity, spills, and illegal dumping. Developed areas can produce stormwater runoff that contains oil, grease, and heavy metals, that can be carry sediment into drainage pathways, and ultimately to adjacent water bodies. Further, permitted uses under the Open Space, Agricultural, Residential, and Special Purpose Zones such as animal husbandry and agricultural uses and oil and gas exploration and production, could result in polluted stormwater runoff.

However, the purpose of the Basin Plans is to manage the quality of surface water and groundwater in Ventura County to provide the highest water quality reasonably possible. The Basin Plans include various objectives for the protection of surface water quality, including ensuring maintenance of healthy levels of ammonia, nitrates, bacteria such as coliform organisms, chemical constituents and radionuclides, inorganic constituents, and nitrogen. Further, future development would comply with Section 8109-0.5 of the County's Non-Coastal Zoning Ordinance, which requires compliance with Ventura Countywide Stormwater Quality Management Program (SQMP), the NPDES permit issued by the appropriate RWQCB, and the Ventura Stormwater Quality Management Ordinance. The SQMP would require future development to implement stormwater BMPs, such as treatment control measures during construction and implementation of biofiltration basins during operations, while compliance with the NPDES permit and the Ventura Stormwater Quality Management Ordinance would prohibit discharge of pollutants from any point source unless the discharge is in compliance with the NPDES permit (Ventura County 2019a).

Oil and gas development would be required to comply with Section 8107-5.6 of the Non-Coastal Zoning Ordinance, which requires that permittees for all oil and gas development projects submit a plan to the County for controlling oil spillage and preventing saline or other polluting or contaminating substances from reaching surface or subsurface waters, consistent with local, State, and federal regulations (Ventura County 2019a). Similarly, oil and gas development within the Coastal Zone shall comply with Section 8175-5.7.8 of the Coastal Zoning Ordinance, which requires that any oil, produced water, drilling fluids, cuttings, and other contaminant associated with the drilling, production, storage, and transport of oil be contained on the site unless properly transported off-site or injected into a well, treated, or reused in an approved manner on-site or, if allowed, on-site. All appropriate permits shall be secured and the permittee shall also submit a plan for preventing oil spillage and prevent saline or other polluting or contaminating substances from reaching surface waters (Ventura County 2017).

Further, all waste discharges, including discharges to surface water, are subject to California Water Code Sections 13260 and 13263, which requires that each RWQCB to prescribe discharge requirements for waste discharges. Water discharges are also subject to California Code of Regulations Title 23, which incorporates waste discharge requirements for discharges to surface water (Los Angeles Regional Water Quality Control Board 2019). Lastly, all oil and gas drilling activities are subject to the DOGGR which outlines additional water quality requirements for oil, gas, and geothermal projects (Department of Conservation 2019). Therefore, through compliance with existing federal and State regulations, as enforced through NPDES permit requirements, new point sources generated by future development under the 2040 General Plan would not result in degradation of surface water quality, causing it to exceed the water quality objectives contained in the Basin Plan. For these reasons, the 2040 General Plan also would not result in substantial risk of release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-9: Cause Stormwater Quality to Exceed Water Quality Objectives or Standards in the Applicable MS4 Permit or Any Other NPDES Permits

The SWRCB and the RWQCBs, through powers granted by the federal Clean Water Act, require specific permits for a variety of activities that have potential to discharge pollutants to waters of the State and adversely affect water quality. To receive an NPDES permit, a notice of intent to discharge must be submitted to the RWQCB and design and operational best management practices (BMPs) must be implemented to reduce the level of contaminated runoff (SWRCB 2004). BMPs can include the development and implementation of regulatory measures (local authority of drainage facility design), various practices, including educational measures (workshops informing public of what impacts result when household chemicals are dumped into storm drains), regulatory measures (local authority of drainage facility design), public policy measures (label storm drain inlets as to impacts of dumping on receiving waters), and structural measures (filter strips, grass swales, and retention basins). All NPDES permits also have inspection, monitoring, and reporting requirements (SWRCB 2004).

The NPDES program also regulates stormwater discharges from municipal separate storm sewer systems (MS4). Pursuant to the Federal Water Pollution Control Act (Clean Water Act) Section 402(p), storm water permits are required for discharges from an MS4 serving a population of 100,000 or more. The Municipal Storm Water Program manages the Phase I Permit Program (serving municipalities over 100,000 people), the Phase II Permit Program (for municipalities less than 100,000), and the Statewide Storm Water Permit for the State of California Department of Transportation. The SWRCB and RWQCB implement and enforce the Municipal Storm Water Program (SWRCB 2019). All stormwater discharge conveyance from future development under the 2040 General Plan would be required to occur within MS4 systems. For these reasons, the 2040 General Plan also would not result in substantial risk of release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone. Thus, through compliance with existing regulations and permits, such as NPDES and MS4 permits, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-10: Be Located within 10 to 20 Feet of Vertical Elevation from an Enclosed Body of Water Such as a Lake or Reservoir, Resulting in a Seiche Hazard

Projects located within about 10 to 20 feet of vertical elevation from an enclosed body of water such as a lake or reservoir are considered more likely to be exposed to a seiche hazard; the precise height of hazard above the water level is dependent on the ground motion intensity, duration of shaking, and subsurface topography of the lake or reservoir and surface topography of the shoreline (Ventura County 2011). Lakes and reservoirs within the plan area include the Matilija Reservoir, Lake Casitas, and Lake Piru Reservoir (Appendix B).

Development under the 2040 General Plan could occur within seiche hazard zones. However, the 2040 General Plan includes policies such as Policy HAZ-4.14, which restricts development in these areas unless a geotechnical investigation has been performed and appropriate standards are incorporated into project design to protect structures from seiche hazards.

Further, Policy HAZ-4.18 requires that the County considers Seiche Hazard Areas during the preparation of regional and Area Plans and special studies, and that these areas are used to guide future investigations of the hazard. Policies are in place that would ensure future development under the 2040 General Plan would incorporate appropriate measures to protect structures from seiche hazards. This discussion of potential exposure to risk involving seiche hazards is provided for information purposes only and is neither required by CEQA nor subject to its requirements.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-11: Be Located in a Mapped Area of Tsunami Hazard

The tsunami hazard zone extends along the coastal portion of the county (Ventura County 2019b). For most portions of the north and south coastal areas, the tsunami hazard does not extend to areas more than 30 feet above sea level. Land use designations within these areas would mostly consist of Open Space, with very limited areas designated as Industrial, Agricultural, Low-Density Residential, and Commercial. Although limited development is projected to occur within these areas under the 2040 General Plan, people and structures in may be located in areas at risk. County plans to assess and address these hazards are outlined in the *Tsunami Operational Area Response Guide* (Ventura County 2017) contained within the Ventura County Emergency Operations Plan. For tsunamis hazards, a warning system and evacuation plan is in place that is considered to provide adequate protection in the event of a major tsunami being generated beyond the Santa Barbara Channel. For projects subject to potential hazards from wave action or tsunamis, the owners are required to understand the potential hazards and to record a "Restrictive Covenant and Notice of Responsibilities" on the subject property (Ventura County 2011).

The County has roadways dedicated for tsunami evacuation routes (Ventura County 2019b). The 2040 General Plan incorporates Program E, which requires that the County update planning documents, maps, and the Tsunami Operational Area Response Guide (Ventura County 2017), when necessary to reflect the most current tsunami information, and identify actions necessary to mitigate property damage, and maintain evacuation readiness. This discussion of potential exposure to risk involving tsunami hazards is provided for information purposes only and is neither required by CEQA nor subject to its requirements.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-12: Result in Erosion, Siltation, or Flooding Hazards

Construction activities associated with future development under the 2040 General Plan would include grading, demolition, and vegetation removal which have the potential to temporarily alter drainage patterns. These activities could expose bare soil to rainfall and stormwater runoff, which could accelerate erosion and could result in sedimentation or siltation of stormwater and, eventually, water bodies. For example, removal of vegetation, excavation, grading, stockpiling of soils for new buildings, and building foundations would create soil disturbance that could accelerate erosion, especially during storm events. If not properly planned for, alteration of the existing drainage pattern could also result in increased runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. However, all future development under the 2040 General Plan would be required to comply with the Ventura Countywide Stormwater Quality Management Program (SQMP), meant to improve water quality and mitigate potential water quality impacts. Compliance with the SQMP would require implementation of stormwater BMPs, such as treatment control measures during construction (Appendix B).

During operation, future development under the 2040 General Plan could alter the existing drainage pattern of the site through the addition of impervious surfaces throughout the county. Increased rates of surface water runoff associated with new impervious surfaces could promote increased erosion and sedimentation or other stormwater contamination and negatively impact surface water and groundwater quality. Similar to potential construction impacts, the County's SQMP would require implementation of stormwater control BMPs, such as biofiltration basins, to ensure stormwater runoff from future development under the 2040 General Plan does not result in additional sources of polluted runoff (Appendix B). Finally, the 2040 General Plan incorporates comprehensive policies that require drainage studies and BMPs for future development projects. For instance, Policy PFS-6.1 requires that all discretionary development provides flood control and drainage facilities, as deemed necessary by the County Public Works Agency and Watershed Protection District, and that discretionary development projects fund improvements to existing flood control facilities necessitated by or required by the development. Policy HAZ-4.12 requires drainage plans that direct runoff and drainage away from slopes, for construction in hillside areas. These policies would ensure that alteration of drainage patterns do not result in erosion, siltation, or flooding hazards. Further, for all future development within the El Rio/Del Norte Area Plan, development would be required to fund a deficiency study to identify existing flooding and erosion or siltation problems and, if necessary, an improvement plan to determine appropriate flood control and drainage facilities necessary to reduce potential impacts. Development within the Oak Park Area Plan, Ojai Valley Area Plan, Piru Area Plan, and Lake Sherwood/Hidden Valley Area Plan is also required to incorporate design that would avoid aggravating flood hazards. With implementation of BMPs required under the County's SQMP, proposed policies under the 2040 General Plan, and Area Plans, future development under the 2040 General Plan would not result in substantial erosion, siltation, or flooding hazards. For these reasons, the 2040 General Plan also would not result in substantial risk of release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-13: Be Located in a Mapped Area of Flood Hazards

Various areas of the county are mapped as areas susceptible to flood hazards, as identified by FEMA's Ventura County DFIRM and Ventura County Watershed Protection District (Appendix B). Inundation hazards in the county include inundation because of location of development within a 100-year flood zone, as defined by FEMA, and dam failure inundation. Various dams, including 16 dams that constitute failure hazards exist throughout the county. These dams include Bouquet Canyon Dam, Casitas Dam, Castaic Dam, Matilija Dam, Pyramid Dam, and Westlake Reservoir Dam (Appendix B). Because of the programmatic nature of this draft EIR, project-specific evaluation of future development under the 2040 General Plan cannot be performed. However, various policies have been incorporated into the 2040 General Plan to reduce potential impacts related to flooding. These include Policy HAZ-2.1, which limits development within these zones, and HAZ-2.8, which requires that the County consider natural, or nature-based flood protection measures for discretionary development or County-initiated development, when feasible. Further, Policy PFS-6.1 requires discretionary developments to provide flood control facilities.

The DWR, Division of Dam Safety, is charged with the inspection of dams greater than 6 feet in height with impoundments of 50 acre-feet of water or more and all dams greater than 25 feet in height that impound more than 15 acre-feet of water. The State dam safety program includes an annual inspection program to ensure dams are safe and performing as intended, and includes an assessment of seismic, hydrologic, and static parameters. If reviews indicate any areas of concern, further studies are completed to fully understand the potential area of weakness and corrective actions are taken. For very large dams, daily visual inspections are also completed (DWR 2019). Further, to minimize loss of life, injury, property damage related to dam failure, the 2040 General Plan includes Policy HAZ-2.6, which requires the County to record a Notice of Dam Inundation Hazard with the County Recorder for new discretionary entitlements (including subdivisions and land use permits) within areas subject to flooding from a dam breach as identified by DWR's Dam Inundation Maps. This discussion of potential exposure to risk involving flood hazards is provided for information purposes only and is neither required by CEQA nor subject to its requirements.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-14: Impact Flood Control Facilities and Watercourses by Obstructing, Impairing, Diverting, Impeding, or Altering the Characteristics of the Flow of Water, Resulting in Exposing Adjacent Property and the Community to Increased Risk of Flood Hazards

The growth anticipated during the planning horizon for the 2040 General Plan could result in development that directly obstructs, diverts, or impedes the flow of water in a manner that could expose adjacent property or the community to increased risk of flood hazards. Further, future development projects would introduce impervious surfaces to sites that were previously undeveloped which could alter the flow of surface runoff in the area and potentially result in erosion and deposition of additional materials into watercourses (see Impact 4.10-12). Development that occurs during the plan horizon of the 2040 General Plan could place structures in locations that encroach on flood control facilities or that do not have sufficient setback from a watercourse. However, the 2040 General Plan incorporates Policy PFS-6.1, which requires discretionary developments to provide flood control facilities and drainage facilities, as deemed necessary by the County Public Works Agency and Watershed Protection District. Policy PFS-6.1 would ensure adequate flood control facilities are provided for future

development under the 2040 General Plan. Lastly, the County has existing regulations, such as the Ventura County Flood Plain Management Ordinance 4521, the Ventura County Flood Control District Design Manual and the Watershed Protection District Hydrology Manual 2006, that also address flood control and drainage facilities. Compliance with these would be required for all future development under the 2040 General Plan. These regulations incorporate design standards to reduce potential overflow of watercourses would occur that would result in flooding. Further, for all future development within the El Rio/Del Norte Area Plan, development would be required to fund a deficiency study to identify existing flooding and erosion or siltation problems and, if necessary, an improvement plan to determine appropriate flood control and drainage facilities necessary to reduce potential impacts. Development within the Oak Park Area Plan, Ojai Valley Area Plan, Piru Area Plan, and Lake Sherwood/Hidden Valley Area Plan is also required to incorporate design that would avoid aggravating flood hazards.

The 2040 General Plan would result in land use development that could adversely affect flood control facilities by reducing their capacity, introducing impervious surfaces that could increase erosion and sedimentation, and/or encroaching on flood control facilities. However, the 2040 General Plan incorporates Policy PFS-6.1, which would ensure that adequate flood control facilities are provided for future development, as deemed necessary by the County Public Works Agency and Watershed Protection District. The County's existing regulations, such as the Ventura County Flood Plain Management Ordinance 4521 the Ventura County Flood Control District Design Manual and the Watershed Protection District Hydrology Manual 2006, also address flood control and drainage facilities and implement design standards to ensure that no overflow of watercourses would occur that would result in flooding. Through compliance with existing regulations and implementation of policies incorporated into the 2040 General Plan, this impact on flood control facilities would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-15: Result in Conflicts With the Ventura County Watershed Protection District's Comprehensive Plan Through Potential Deposition of Sediment and Debris Materials within Existing Channels and Allied Obstruction of Flow; Overflow of Channels during Design Storm Conditions; and Increased Runoff and the Effects on Areas of Special Flood Hazard and Regulatory Channels Both On- and Off-Site, for Projects Not Located within the Ventura County Watershed Protection District's Comprehensive Plan

As discussed under Impact 4.10-12, future development under the 2040 General Plan could result in sedimentation into existing channels during both construction and operation. For instance, construction materials, such as gasoline, diesel fuel, lubricating oils, grease, solvents, and paint, would be brought on site. If existing drainage patterns are substantially altered, this could result in increase to the pollutant load, such as sediment and debris, in runoff, and eventually in nearby water bodies. Future development could also alter the existing drainage pattern of the site through the addition of impervious surfaces. Increased rates of surface water runoff associated with new impervious surfaces could promote increased sedimentation within existing channels that could obstruct flow. However, all future development under the 2040 General Plan would be required to comply with the Ventura Countywide SQMP. Compliance with the SQMP would result in implementation of stormwater BMPs, such as treatment control measures during construction as well as implementation of stormwater control BMPs, such as biofiltration basins, to ensure stormwater runoff from future development does not result in additional sources of polluted runoff during operation (Appendix B).

As discussed under Impact 4.10-13, various areas of the county are mapped as areas susceptible to flood hazards, as identified by FEMA's Ventura County DFIRM and Ventura County Watershed Protection District. In the absence of stormwater improvements at future development sites, alterations of the drainage pattern could substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. However, various 2040 General Plan policies are incorporated that require drainage studies and BMPs for future development projects. For instance, Policy PFS-6.1 requires that all discretionary development provides flood control and drainage facilities, as deemed necessary by the County Public Works Agency and Watershed Protection District and that discretionary development projects fund improvements to existing flood control facilities necessitated by or required by the development. Thus, the 2040 General Plan would not result in projects that would result in potential deposition of sediment and debris materials within existing channels and allied obstruction of flow, overflow of channels during design storm conditions, or increased runoff and the effects on Areas of Special Flood Hazard and regulatory channels both on- and off-site. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-16: Result in Noncompliance with Building Design and Construction Standards Regulating Flow to and from Natural and Man-Made Drainage Channels

As described in the ISAG, any project that does not comply with the applicable requirements of the listed regulations, manuals and standards is considered to have a potentially significant impact. These regulations include the Ventura County Building Code, Ventura County Land Development Manual, and the Ventura County Subdivision Ordinance, among others. Any future development under the 2040 General Plan would be required to comply with all applicable federal, State, and local regulations, including County regulations related to drainage. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.10-17: Be Designed to Meet All Applicable Requirements for Onsite Wastewater Treatment Systems

Areas not serviced by wastewater disposal service providers typically have septic systems, also referred to as onsite wastewater treatment systems (OWTS), for public sewer utility. Under the 2040 General Plan, proposed land uses would largely consist of Open Space and Agricultural uses. These land use designations allow for sparse development within large undeveloped land, which could result in the need for OWTS. Residential, Commercial, and Industrial land use designations are also proposed in some areas of the county and are generally located in the vicinity of existing cities, which generally have local or regional sewage disposal systems in place.

Certain areas of the county may have geologic features or soils that are incapable of supporting, or incompatible with, the installation of OWTS, thereby causing adverse groundwater impacts. The County requires OWTS be properly sited pursuant to the findings of a geotechnical report as part of the discretionary and ministerial review process required by the Local Agency Management Program for Onsite Wastewater Treatment Systems. If the moisture content and/or soil type differs at various locations, localized or nonuniform

movement may occur, which cause damage to the septic tank or alternative public sewer utility system. Damage caused by expansive soils can be slow and long term, and not attributable to any particular event. However, construction of OWTS would be required to comply with the existing local regulations including Ventura County Building Code, Articles 1 and 6, Ventura County Sewer Policy, Ventura County Ordinance Code, Division 4, California Plumbing Code, the Environmental Health Division Onsite Wastewater Treatment System Technical Information Manual, and the California Regional Water Quality Control Board Basin Plans (Ventura County 2011). Further, all future OWTS would be required to comply with the Local Agency Management Program for Onsite Wastewater Treatment systems, which includes requirements for permitting of OWTS and limitations of OWTS development (Ventura County Environmental Health 2018). The California SWRCB also adopted the Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems in 2012, which sets standards for OWTS that are constructed or replaced, that are subject to a major repair, that pool or discharge waste to the surface of the ground, and that have affected, or will affect, groundwater or surface water to a degree that makes it unfit for drinking water or other uses, or cause a health or other public nuisance condition (SWRCB 2019). Through adherence with these regulations, this impact related to construction of OWTS would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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4.11 LAND USE AND PLANNING

This section evaluates the potential effects of implementing the 2040 General Plan on land use and planning, including community character and established communities. This section also addresses compatibility with the Ventura County Comprehensive Airport Land Use Plan. For discussion of aircraft-related hazards, refer to Section 4.9, “Hazards, Hazardous Materials and Wildfire.” Refer to Section 4.13, “Noise and Vibration,” for discussion of aircraft-related noise impacts. As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments received on the notice of preparation included concerns regarding land use and zoning, conformance with the Guidelines for Orderly Development, and consistency with the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

4.11.1 Background Report Setting Updates

REGULATORY SETTING

The Background Report (Appendix B) accurately describes the regulatory setting for the purpose of this evaluation. Refer to Chapter 3, “Land Use,” and Section 8.3, “Scenic Resources.” There is no additional information necessary to understand the potential land use and planning impacts of the 2040 General Plan.

ENVIRONMENTAL SETTING

The Background Report (Appendix B) accurately describes the environmental setting for the purpose of this evaluation. Refer to Chapter 3, “Land Use,” and Section 8.3, “Scenic Resources.” There is no additional information necessary to understand the potential land use and planning impacts of the 2040 General Plan.

4.11.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

The evaluation of potential land use impacts is based on review of documents pertaining to the plan area, as well as potential compatibility of the 2040 General Plan with existing and planned land uses within the unincorporated county. As part of this review, the Background Report, land use plans for cities and Area Plans, geographic information system zoning and land use designations were reviewed to determine whether implementation of the 2040 General Plan would impede or conflict with those plans such that an environmental impact would occur.

In determining the level of significance, this analysis assumes that the 2040 General Plan would comply with relevant Guidelines for Orderly Development, greenbelt agreements, and the Save Open Space & Agricultural Resources (SOAR) initiative measure for Ventura County's unincorporated areas.

THRESHOLDS OF SIGNIFICANCE

As discussed in the "Approach to the Environmental Analysis" section, the thresholds used to determine the significance of the proposed GPU's impacts are based on Ventura County's adopted Initial Study Assessment Guidelines (ISAG), which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project's impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, ISAG Section 25, threshold 1, related to consistency of a land use or project activity with the community character policies and development standards in the Ventura County General Plan goals, policies and programs, or applicable Area Plan, is not used as a threshold in this analysis because this draft EIR is an evaluation of an update to the Ventura County General Plan goals, policies and programs, and Area Plans under which future projects would be evaluated. Future development and other physical changes would be required to demonstrate consistency with the 2040 General Plan.

In addition, ISAG Section 25, threshold 2 has been revised to delete references to project-specific and cumulative impacts to a community surrounding a project site. These revisions broaden the threshold to apply to program-level impacts with respect to established communities within the plan area. In addition, Appendix G question XI.a, which evaluates whether a project would physically divide an established community, and Appendix G question XI.b, which evaluates whether a project would cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation, are not addressed by ISAG thresholds. Therefore, these questions have been added as separate thresholds below.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant impact on land use and planning if it would:

- ▶ Result in physical development that is incompatible with existing land uses, architectural form or style, site design/layout, or density/parcel sizes within any communities.
- ▶ Result in the physical division of an established community.
- ▶ Cause a significant environmental impact due to a conflict with a regional plan, policy, or program adopted for the purpose of avoiding or mitigating an environmental effect.

ISSUES NOT DISCUSSED FURTHER

The Area Plans for communities of El Rio/Del Norte, Lake Sherwood/Hidden Valley, North Ventura Avenue, Oak Park, Ojai Valley, Piru, and Thousand Oaks were reviewed for updates to policies and implementation programs specific to these Area Plans that would potentially have impacts on the environment with respect to land use and planning. The 2040 General Plan would not result in substantive changes to area plan policies and implementation programs related to land use and planning. The Area Plan policies and implementation programs related to these issues are consistent with the 2040 General Plan policies and implementation programs, which are addressed in the following impact discussions. Therefore, the environmental effects of the Area Plan goals and policies are not addressed separately in this section.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to land use and community character and, specifically, the thresholds of significance identified above, include the following:

Land Use and Community Character Element

- ▶ **Policy LU-1.1: Guidelines for Orderly Development.** The County shall continue to promote orderly and compact development by:
 - working with cities in Ventura County and the Ventura Local Agency Formation Commission (LAFCO) to promote and maintain reasonable city boundaries and Spheres of Influence to prevent growth-inducing urban development in unincorporated areas, and
 - require unincorporated urban development to be located in areas designated as Existing Communities and unincorporated urban centers consistent with the Guidelines for Orderly Development and as defined in Policy LU-1.2. (RDR, IGC) *[Source: Existing GPP Goal 3.1.1.2 and Goal 3.1.1.5, modified]*
- ▶ **Policy LU-1.2: Area Designations.** For purposes of planning within the county and as used in this General Plan, the County establishes the following area designations:
 - **Urban.** Figure 2-1 indicates the boundary of the Urban area designation. All areas inside these boundaries are considered within the Urban area designation for purposes of this General Plan and implementation of the Guidelines for Orderly Development and Save Open Space & Agricultural Resources (SOAR). See Goal LU-2 and associated policies for further information on this designation.
 - **Existing Community.** Figure 2-1 indicates the boundary of the Existing Community area designation. All areas inside these boundaries are considered within the Existing Community area designation for purposes of this General Plan and implementation of the Guidelines for Orderly Development and Save Open Space & Agricultural Resources (SOAR). See Goal LU-3 and associated policies for further information on this designation.

- **Area Plans.** Area Plans are an integral part of the County's General Plan, providing the basis for future land use development in specifically defined areas. These plans govern the distribution, general location, and extent of uses of the land for housing, business, industry, open space, agriculture, and public facilities. In the General Plan, the Area Plan designation defines the boundary for the specific geographic areas of the county that are covered by an adopted Area Plan. Area Plans shall be consistent with the General Land Use Diagram, although the Area Plans may be more specific. Figure 2-2 indicates the areas covered by the Area Plans in the county.
- An **Area of Interest** is part of a plan adopted by Ventura Local Agency Formation Commission (LAFCO) which divides the county into major geographic areas that are reflective of community and planning identity. Within each Area of Interest there should be no more than one city or unincorporated urban center, but there will not necessarily be a city or unincorporated urban center in each Area of Interest. Figure 2-3 shows the Area of Interest boundaries for the county.
- An **Unincorporated Urban Center** is an existing or planned community which is located in an Area of Interest where no city exists. The unincorporated urban center represents the focal center for community and planning activities within the Area of Interest. For example, the Community of Piru represents the focal center in the Piru Area of Interest.
- A **Sphere of Influence**, as used in this General Plan, is an area determined by the Ventura Local Agency Formation Commission (LAFCO) to represent the "probable" ultimate boundary of a city. LAFCO also recognizes Spheres of Influence for special districts, which are not discussed in this Element. The adoption of Spheres of Influence is required by Government Code Section 56425. (RDR) *[Source: Existing GPP, Section 3.2, modified]*
- ▶ **Policy LU-1.3: Regional Housing Needs Allocations.** The County shall coordinate with Southern California Association of Governments (SCAG) to direct state regional housing needs allocations predominantly to cities to ensure consistency with the County's Save Open Space & Agricultural Resources (SOAR) initiative and the SCAG's Sustainable Communities Strategy. (RDR, IGC) *[Source: New Policy]*
- ▶ **Policy LU-1.4: Land Use Patterns.** The County shall ensure that new land use patterns emphasize efficient use of land and infrastructure, walkable neighborhoods, contemporary development practices, and sense of place consistent with the Guidelines for Orderly Development. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-1.5: Infill Development.** The County shall encourage infill development within Existing Communities and within or adjacent to existing development within unincorporated urban centers to maximize the efficient use of land and existing infrastructure. (RDR) *[Source: Existing GPP Policy 3.4.2.1 and Policy 4.1.2.2, modified]*
- ▶ **Policy LU-2.1: Urban.** The Urban area designation, referred to in the Save Open Space & Agricultural Resources (SOAR) initiative, is used to depict existing and planned urban centers which include commercial and industrial uses as well as residential uses where the building intensity is greater than one principal dwelling unit per two acres. This designation has been applied to all incorporated lands within a city's Sphere of Influence as established

by the Local Agency Formation Commission (LAFCO), and unincorporated urban centers within their own Areas of Interest which may be candidates for future incorporation. In this General Plan, this term is synonymous with the combination of the areas shown as “Cities” and “Unincorporated Urban Centers” on Figure 2-1. (RDR, MPSP) *[Source: Existing GPP Policy 3.2 Land Use Designations, modified, SOAR]*

- ▶ **Policy LU-3.1: Existing Community(ies).** The Existing Community area designation, referred to in SOAR, identifies existing urban residential, commercial, or industrial enclaves outside of incorporated areas and unincorporated urban centers. The Existing Community area designation recognizes existing land uses in unincorporated areas which have been developed with urban building intensities and urban land uses, contains these enclaves within specific areas so as to prevent further expansion, and limits the building intensity and land use to previously established levels. Thomas Aquinas College is newly designated in this initiative as Existing Community, with the intention that it be confined to its current boundaries with the understanding that it may continue to intensify its building for its educationally related purposes.

Figure 2-1 indicates the boundary of the Existing Community area designation. All areas inside these boundaries are considered within the Existing Community area designation for purposes of this General Plan and implementation of the Guidelines for Orderly Development and Save Open Space & Agricultural Resources (SOAR) initiative. This term is considered synonymous with “Urban Enclave” as used in other planning documents. (RDR, MPSP) *[Source: Existing GPP Policy 3.2 Land Use Designations, modified. SOAR]*

- ▶ **Policy LU-3.2: Areas Appropriate for the Existing Community Designation.** The County shall include existing unincorporated urban enclaves located outside cities and unincorporated urban centers within Existing Community designated boundaries. (MPSP) *[Source: Existing GPP Policy 3.2.2.2, SOAR, modified]*
- ▶ **Policy LU-3.3: Range of Uses in the Existing Community Designation.** The County shall recognize that the Existing Community area designation may cover the range of zones present in the area including, but not limited to, residential, commercial, and industrial, as well as the range of existing population densities and building intensities. The County shall allow the appropriate zoning, population densities, and building intensities based on the adopted Area Plan or, where no Area Plan exists, by the applicable Existing Community Map contained in Appendix A. Because of the degree of specificity on the Existing Community Maps, the County shall require a General Plan amendment for any zone change within an Existing Community. (MPSP) *[Source: Existing GPP Policy 3.2.2.2, SOAR]*
- ▶ **Policy LU-4.1: General Plan Land Use Diagram.** The County shall maintain and implement a Land Use Diagram for purposes of describing the types of allowed land uses by geographic location and the density and/or intensity of allowed uses within each designation.

The goals and locational descriptions set forth in this Element are general guidelines for determining whether land should be within a particular land use designation depicted on the General Plan Land Use Diagram (Figures 2-4 and 2-5). The land use designation applied to a specific parcel of land shall be as designated on the General Land Use Diagram, whether or not such parcel meets all of the applicable criteria.

The General Plan Land Use Diagram covers the mainland areas of the county. The following designations apply to Anacapa and San Nicholas islands and are incorporated into the Land Use Diagram by reference.

- Anacapa Island is designated “OS” as Open Space
- San Nicholas Island is designated “P” as State, Federal, Other Public Lands (RDR) *[Source: Existing GPP Policy 3.1.2.1, modified]*
- ▶ **Policy LU-4.2: Zoning Consistency.** The County shall ensure that zoning designations are consistent with the General Land Use Diagrams (Figures 2-4 and 2-5) and the Zoning Consistency Matrix (Table 2-1). The County shall apply the following factors to determine the appropriate zone classification (from among those consistent with the appropriate land use designation):
 - Recognizing the desirability of retaining existing uses and densities on the subject land;
 - Recognizing the desirability of accommodating anticipated uses on the subject land;
 - Maintaining continuity with neighboring zoning, land uses and parcel sizes;
 - Implementing the recommendations of specific zoning and land use studies of the area in question;
 - Recognizing and addressing the presence and significance of resources and hazards; and
 - Evaluating the ability to provide public services and facilities. (RDR) *[Source: Existing GPP Policy 3.1.2.2, Modified]*
- ▶ **Policy LU-4.3: Minimum Parcel Size.** The County shall require subdivisions of land to meet the minimum parcel size requirements established by Table 2-2, by the applicable Zoning Compatibility Matrix established by the respective Area Plans, or by the applicable Existing Community land use diagrams contained in Appendix A. Parcels smaller than the stated minimum may be allowed under the following circumstances:
 - A parcel may be created for the sole purpose of transferring, by lease or sale, possession of an agricultural water well and the land around the well as may be necessary for its operation. Such parcels, and the wells they contain, shall be used for agricultural purposes only.
 - Parcels for public purposes such as, but not limited to, fire, police, municipal water wells, flood control, and other public health and safety facilities.
 - Affordable and elderly housing developments that are eligible for density bonuses as specified in Article 16 of the County Non-Coastal Zoning Ordinance may be granted a reduction from the minimum parcel size requirements in accordance with the provisions of Article 16 or pursuant to state law.

- Parcels designated as Cultural Heritage Sites may be granted a reduction from the minimum parcel size requirements in accordance with the Non-Coastal Zoning Ordinance.
 - Parcels subdivided for resource conservation purposes in accordance with the conservation subdivision process established in the Ventura County Subdivision Ordinance.
 - Parcels subdivided for the perpetual maintenance of biotic or wildlife habitat in accordance with California Government Code section 66418.2.
 - Parcels of less than the prescribed minimum lot area may be allowed for farmworker housing complexes on land zoned Agricultural Exclusive (AE) within or adjacent to a city Sphere of Influence, provided the remaining non-farmworker housing complex parcel is a minimum of 10 acres. (RDR) *[Source: Existing GPP Policy 3.1.2.6, Modified]*
- **Policy LU-4.4: Nonconforming Parcel Size.** The County shall not prohibit the use or development of a parcel which is a legal lot for the purposes of the County Subdivision Ordinance, but which fails to meet the minimum parcel size requirements of the applicable land use designation, solely by reason of such failure. However, this policy shall not be construed to permit the division of any parcel into two or more lots if any of the new lots fail to meet the minimum parcel size requirements. (RDR) *[Source: Existing GPP Policy 3.1.2.7, modified]*
- **Policy LU-5.1: General Plan Land Use Amendments.** When reviewing proposed General Plan amendments to modify or change land use designations or the General Plan Land Use Diagram, the County shall consider if the proposal:
- maintains consistency with the General Plan Vision, Guiding Principles, and relevant goals, and policies;
 - maintains consistency with the Guidelines for Orderly Development;
 - minimizes the creation of a land use that is inconsistent with the policies, land uses, or development standards of surrounding parcels;
 - enhances compatibility with existing or planned uses in the area;
 - addresses new physical, social, or economic factors that are relevant and were not present at the time of the General Plan adoption;
 - reduces the potential for undesired, growth-inducing precedent;
 - demonstrates appropriate infrastructure and services are available, or amendment is conditioned on requirement to provide or appropriately fund needed infrastructure and services; and
 - demonstrates acceptable effect on the fiscal health of the County. (MPSP) *[Source: New Policy]*

- ▶ **Policy LU-5.2. Land Use Boundary Interpretation.** The County Planning Director shall have the interpretative authority, subject to appeal to the Planning Commission and Board of Supervisors, of the alignment of all land use boundaries depicted on the General Plan Land Use Diagram, consistent with the goals and policies of the General Plan. To the extent feasible, the boundaries on the Land Use Diagram should follow natural or human-made boundaries (including parcel lines), such as:
 - water courses
 - ridge lines
 - toes of slopes
 - lines marking changes in vegetation
 - lines marking changes in slope
 - parcel boundaries
 - roads
 - rail lines
 - utility corridors
 - lines separating different land uses
 - lines marking the separation between a group of large lots from a group of small lots
 - lines marking features or designations referenced in the definitions and criteria of the various land use categories. (RDR) *[Source: Existing GPP Policy 3.1.2.8, Existing Lake Sherwood/Hidden Valley Area Plan Policy 1.1.2.3, Oak Park Area Plan Policy 3.1.2.2, and Piru Area Plan Policy 3.1.2.2, modified]*
- ▶ **Policy LU-5.3: Concurrent Zoning Change Processing.** The County shall process zone changes, if necessary, concurrently with General Plan amendments to assure zoning consistency. (RDR) *[Source: Existing GPP Policy 3.1.2.9]*
- ▶ **Policy LU-6.1: Agricultural Buffers.** The County shall require non-agricultural land uses adjacent to agricultural uses to incorporate adequate buffers (e.g., fences, setbacks) to limit conflicts with adjoining agricultural operations. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-7.1: Areas Appropriate for the Rural Land Use Designation.** The County shall require that lands designated as Rural are those located outside areas designated Urban or Existing Community which are deemed suitable and appropriate for low-density rural residential or recreational development. (RDR) *[Source: Existing GPP Policy 3.2.2.3, SOAR]*

- ▶ **Policy LU-7.2: Minimal Parcel Size for the Rural Land Use Designation.** The County shall require that the smallest minimum parcel size consistent with the Rural land use designation is two acres. The County may require larger minimum parcel sizes based on the parcel's Non-Coastal Zoning Ordinance zoning classification. (RDR) *[Source: Existing GPP Policy 3.2.2.3, SOAR, modified]*
- ▶ **Policy LU-7.3: Maximum Lot Coverage Nonconforming Lots - Rural Land Use Designation.** The County shall require that the maximum lot coverage for lots of less than one acre (nonconforming) in area shall be as specified for the Rural designation, or 2,500 square feet plus 1 square foot for each 4.596 square feet of lot area over 5,000 square feet, whichever is greater. (RDR) *[Source: Existing GPP Figures 3.7a through 3.28b, Existing Community Building Intensity/Population Density Tables, Footnote No. 1]*
- ▶ **Policy LU-8.1: Areas Appropriate for the Agricultural Land Use Designation.** The County shall ensure that the Agricultural land use designation primarily includes lands that are designated as Prime Farmlands, Farmlands of Statewide Importance, or Unique Farmlands in the state's Important Farmland Inventory (IFI), although the County may not designate land as Agricultural if small areas of agricultural land are isolated from larger blocks of farming land. In such cases, the Agricultural land is to be assigned to the Open Space or Rural designation for consistency with surrounding properties. (MPSP) *[Source: Existing GPP Policy 3.2.2.4-1, SOAR]*
- ▶ **Policy LU-8.2: Land Uses Appropriate for the Agricultural Land Use Designation.** The County shall ensure that land designated as Agricultural is used for the production of food, fiber, and ornamentals; animal husbandry and care; uses accessory to agriculture; and limited temporary or public uses which are consistent with agricultural or agriculturally related uses. (RDR) *[Source: Existing GPP Policy 3.2.2.4-3, SOAR]*
- ▶ **Policy LU-8.3: Minimal Parcel Size for the Agricultural Land Use Designation.** The County shall ensure that the smallest minimum parcel size consistent with the Agricultural land use designation is 40 acres. The County may require larger minimum parcel sizes based on the zone classification. (RDR, MPSP) *[Source: Existing GPP Policy 3.2.2.4-2, SOAR]*
- ▶ **Policy LU-8.4: Maximum Lot Coverage Nonconforming Lots - Agricultural Land Use Designation.** The County shall ensure that the maximum lot coverage of lots of less than 10 acres (nonconforming) in area shall be as specified for the Agricultural designation, or 2,500 square feet plus 1 square foot for each 22.334 square feet of lot area over 5,000 square feet, whichever is greater. Greater lot coverage may be allowed under discretionary permits for Farmworker Housing Complexes and existing uses/structures listed in the Non-Coastal Zoning Ordinance under the heading of "Crop and Orchard Production." (RDR) *[Source: Existing GPP Figure 3.4 General Residential Building Intensity Standards/Population Density Range Table, Footnote No. 5, modified]*
- ▶ **Policy LU-9.1: Areas Appropriate for the Open Space Land Use Designation.** The County shall ensure that the Open Space land use designation includes areas of land or water that are set aside for the preservation of natural resources, including, but not limited to, areas required for the preservation of plant and animal life, including habitat for fish and wildlife species; areas required for ecologic and other scientific study purposes; rivers, streams, bays, wetlands, and estuaries; and coastal beaches, lakeshores, banks of rivers and streams, and important watershed lands. (MPSP) *[Source: Existing GPP Policy 3.2.2.5-1, SOAR]*

- ▶ **Policy LU-9.2: Preservation of Areas for Public Health and Safety.** The County shall designate areas of land or water which are set aside for public health and safety as Open Space, thereby safeguarding humans and property from certain natural hazards, including, but not limited to, areas which require special management or regulation because of hazardous or special conditions such as earthquake fault zones, unstable soil areas, flood plains, watersheds, areas presenting high fire risks, areas required for the protection of water quality and water reservoirs, and areas required for the protection and enhancement of air quality. (MPSP) *[Source: Existing GPP Policy 3.2.2.5-4, SOAR, modified]*
- ▶ **Policy LU-9.3: Minimal Parcel Size for the Open Space Land Use Designation.** The County shall ensure that the smallest minimum parcel size consistent with the Open Space land use category is 10 acres. The County may require larger minimum parcel sizes based on the zone classification. (RDR, MPSP) *[Source: Existing GPP Policy 3.2.2.5-6, SOAR]*
- ▶ **Policy LU-9.4: Minimal Parcel Size for the Open Space Contiguous with Agricultural.** The County shall require Open Space properties contiguous with Agricultural designated land to have a minimal parcel size of 20 acres. (RDR, MPSP) *[Source: Existing GPP Policy 3.2.2.5-7, SOAR]*
- ▶ **Policy LU-9.5: Recreational Areas Appropriate for the Open Space Land Use Designation.** The County shall designate areas appropriate for recreational activities as Open Space, including, but not limited to, use and enjoyment of recreational trails and areas for hunting and fishing. Preservation of open space also serves to protect areas of outstanding scenic, historic, and cultural value; areas particularly suited for park and recreation purposes, including access to lakeshores, beaches, and rivers and streams; and areas which serve as links between major recreation and open space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors. (MPSP) *[Source: Existing GPP Policy 3.2.2.5-3, SOAR, modified]*
- ▶ **Policy LU-9.6: Undeveloped Areas Appropriate for the Open Space Land Use Designation.** The County shall designate undeveloped natural areas as Open Space if they surround urban-designated areas which have been set aside to define the boundaries of the urban-designated areas, to prevent urban sprawl, and to promote efficient municipal services and facilities by confining the areas of urban development. (MPSP) *[Source: Existing GPP Policy 3.2.2.5-5, SOAR, modified]*
- ▶ **Policy LU-9.7: Natural Resource Areas Appropriate for the Open Space Land Use Designation.** The County shall designate areas set aside for managed production of resources as Open Space, including, but not limited to, forest lands, rangeland, agricultural lands not otherwise designated Agricultural; areas required for the recharge of groundwater basins; bays, estuaries, marshes, rivers, and streams which are important for the management of commercial fisheries; and areas containing major mineral deposits, including those in short supply. (MPSP) *[Source: Existing GPP Policy 3.2.2.5-2, SOAR, modified]*
- ▶ **Policy LU-9.8: Maximum Lot Coverage Nonconforming Lots – Open Space Land Use Designation.** The County shall ensure that the maximum lot coverage of lots of less than 10 acres (nonconforming) in area shall be as specified for the Open Space designation, or 2,500 square feet plus 1 square foot for each 22,334 square feet of lot area over 5,000 square feet, whichever is greater. Greater building coverage may be allowed under discretionary permits for Farmworker Housing Complexes and existing uses/structures

listed in the Non-Coastal Zoning Ordinance under the heading of “Crop and Orchard Production.” (RDR) *[Source: Existing GPP Figure 3.4 General Residential Building Intensity Standards/Population Density Range Table, Footnote No. 5, modified]*

- ▶ **Policy LU-9.9: Open Space Land Use Designation Interpretations.** The County shall ensure that Open Space Interpretations granted prior to May 17, 1983 permitting parcel sizes less than those specified in the General Plan shall be considered conforming to the General Plan. Zoning which is consistent with the purpose and intent of the Open Space Interpretations shall be considered conforming to the General Plan. (RDR) *[Source: Existing GPP Figure 3.2a Zoning Compatibility Matrix Non-Coastal Zones, Footnote Open Space Interpretations, modified]*
- ▶ **Policy LU-11.1: Location.** The County shall encourage mixed-use, commercial, and industrial discretionary development be located within cities, existing unincorporated urban centers, or designated Existing Communities where necessary public facilities and services can be provided to serve such development. (RDR) *[Source: Existing GPP Policy 3.4.2.1, modified]*
- ▶ **Policy LU-11.2: Applications Within Sphere of Influence.** The County shall direct all applicants for commercial and industrial discretionary development located within a city’s Sphere of Influence to that city for possible annexation and processing. (RDR) *[Source: Existing GPP Policy 3.4.2.2, modified]*
- ▶ **Policy LU-11.3: Design.** The County shall require new commercial and industrial developments to be designed to be generally compact, grouped and consolidated into functional units providing for sufficient off-street parking and loading facilities, maximize pedestrian and vehicle safety, reduce vehicle miles traveled (VMT), encourage electric vehicle charging, and minimize the land use conflicts and traffic congestion. The County shall require that commercial and industrial discretionary development is designed to provide adequate buffering (e.g., walls, landscaping, setbacks) and operational conditions (e.g., hours of operation, and scheduling of deliveries) to minimize adverse impacts (e.g., noise, glare, and odors) on adjoining and adjacent residential areas. (RDR) *[Source: Existing GPP Policies 3.4.2.3 and 3.4.2.4, modified]*
- ▶ **Policy LU-11.5: Mixed-Use Development.** The County shall require discretionary development on land designated mixed-use be developed under a single plan that details the full buildout of the development and any associated phasing for construction and includes specific design guidelines and standards that address the overall site design, scale of development, relationship to adjacent uses, circulation and parking, architecture, infrastructure, and landscaping. (RDR, PSP) *[Source: New Policy]*
- ▶ **Policy LU-11.6: Live-Work Development.** The County shall encourage mixed-use developments to include live-work floor plans for residents who desire office, commercial, or studio space adjacent to their living space. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-11.7: Density Exceptions – Mixed Use Land Use Designation.** The County shall exclude from the Mixed Use land use maximum density farmworker dwellings and accessory dwelling units pursuant to section 65852.2 of the Government Code. (RDR) *[Source: Existing GPP Figure 3.4 General Residential Building Intensity Standards/Population Density Range Table, Footnote No. 2, Modified]*

- ▶ **Policy LU-11.8: Location of Retails Sales and Service Type Commercial and Office Facilities.** The County shall encourage retail sales and service type commercial and office facilities to locate in shopping centers, established commercial areas, or planned mixed-use districts. (RDR) [Source: Existing GPP Policy 3.4.2.5]
- ▶ **Policy LU-12.1: Parks and Recreational Facilities.** The County shall support the development of parks and recreation facilities within areas designated as Existing Community, Area Plans, or Areas of Interest. (RDR) [Source: New Policy]
- ▶ **Policy LU-13.1: Areas Appropriate for the State, Federal, Other Public Lands Land Use Designation.** The County shall include state- or federally-owned lands on which a significant governmental use is located under the State, Federal, Other Public Lands land use designation, and which are under the control of the state or federal government. For state land within the coastal zone, the County has land use authority except for land under the California Coastal Commission's jurisdiction. All other areas are beyond the land use jurisdiction of the County. (MPSP) [Source: Existing GPP Policy 3.2.2.6]
- ▶ **Policy LU-15.1: Area Plan Requirements.** When the County comprehensively updates an Area Plan, the County shall ensure that the updated Area Plan includes specific policies and programs that address local issues, and a range of land use designations that accommodate the land uses appropriate to the area and commensurate with public infrastructure and services. Through the Area Plan Update process, the County shall ensure that all principles, goals, objectives, policies, and plan proposals set forth in the area plan are consistent with the County General Plan.

For consistency, the County shall organize the updated area plans using the following structure:

Introduction

- Purpose
- Area Plan Chronology
- Content and Organization

Local Setting

- Overview of Plan Area
- Community History

Area Plan Elements

- Land Use and Community Character
- Circulation, Transportation, and Mobility
- Public Facilities, Services, and Infrastructure
- Conservation and Open Space
- Hazards and Safety
- Water Resources (MPSP) [Source: New Policy]

- ▶ **Policy LU-15.2: General Plan and Area Plan Consistency.** Area Plans for specific geographic subareas of the County may be adopted as part of the County General Plan. Area Plans shall be consistent with the General Land Use Diagram (Figures 2-4 and 2-5), although the Area Plans may be more specific and provide additional direction and restrictions concerning future development and resource management. (MPSP) *[Source: Existing GPP Policy 3.1.2.4]*
- ▶ **Policy LU-15.3: General Plan and Area Plan Hierarchy.** Within locations covered by an area plan, where an inconsistency is identified between the General Plan and the Area Plan, the more restrictive of the two shall prevail. (RDR, MPSP) *[Source: New Policy]*
- ▶ **Policy LU-15.4: Complete Communities.** The County shall encourage the development of an appropriately-scaled land use mix in each designated Area Plan where these plans include this type of use, and each designated Existing Community that contributes to an adequate economic base to fund capital improvements, including long-term maintenance, and to meet the daily needs of residents, including grocery stores, local-serving restaurants, community facilities, and civic centers. (RDR, MPSP) *[Source: Lake Sherwood/Hidden Valley Area Plan Goal 1.1.1.4 and Oak Park Area Plan Goal 3.1.1.5, modified]*
- ▶ **Policy LU-15.5: Commercial and Industrial Land for Employment Uses.** The County shall provide sufficient commercially and industrially designated land to meet the employment needs of the community. (MPSP) *[Source: Existing El Rio/Del Norte Area Plan Goal 3.8.1.1 and Piru Area Plan Goal 3.3.1.1]*
- ▶ **Policy LU-15.6: Neighborhood Configurations to Promote a Variety of Lifestyles.** The County shall encourage the development of neighborhood configurations that encourage a variety of lifestyles, a central community focus, and distinct identity. (MPSP, RDR) *[Source: Existing Oak Park Area Plan Goal 3.3.1.3]*
- ▶ **Policy LU-15.7: Neighborhood Configurations to Preserve Natural Features.** The County shall encourage the development of neighborhood configurations that preserve the natural features of the site and minimize the requirements for grading. (RDR) *[Source: Existing Oak Park Area Plan Goal 3.3.1.4 and Thousand Oaks Area Plan Goal 3.3.1.2]*
- ▶ **Policy LU-15.8: Nonconforming Uses in Residential Areas.** The County shall continue to work with land owners to eliminate nonconforming land uses in residential areas, as appropriate. (SO) *[Source: Existing El Rio/Del Norte Area Plan Goal 3.6.1.4, modified]*
- ▶ **Policy LU-16.1: Community Character and Quality of Life.** The County shall encourage discretionary development to be designed to maintain the distinctive character of unincorporated communities, to ensure adequate provision of public facilities and services, and to be compatible with neighboring uses. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-16.2: Urban Design Standards for Commercial and Industrial Development.** The County shall require that discretionary commercial and industrial developments maintain high standards of urban design and environmental quality by incorporating compact form, maximizing pedestrian access and safety, and minimizing land use conflicts and traffic congestion. (RDR) *[Source: Existing GPP Goal 3.4.1.5 and Policy 3.4.2.3, modified]*

- ▶ **Policy LU-16.3: Mixed-Use Development.** The County shall support compatible, mixed-land use development in areas designated as Area Plans and Existing Communities, where these plans include this type of use. (MPSP, RDR) *[Source: New Policy]*
- ▶ **Policy LU-16.4: Live/Work Spaces.** In Area Plans and Existing Communities, the County shall encourage the development of flexible live-work spaces for residents who desire office, commercial, or studio space adjacent to their living space, where these plans include this type of use. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-16.5: Multimodal Access to Commercial Development.** The County shall encourage discretionary commercial development to promote ease of pedestrian/bicycle access to encourage walk-in business, while providing sufficient off-street parking. (RDR) *[Source: Existing El Rio/Del Norte Area Plan Goal 3.7.2.2, El Rio/Del Norte Area Plan Goal 3.7.1.4, Piru Area Plan Policy 3.2.2.6, and Oak Park Area Plan Policy 3.4.2.2]*
- ▶ **Policy LU-16.6: Strip Commercial Development Concerns.** The County shall discourage the development of new or expansion of existing strip commercial development. (RDR) *[Source: Existing El Rio/Del Norte Area Plan Goal 3.7.1.5 and Ojai Valley Area Plan Goal 3.6.1.3]*
- ▶ **Policy LU-16.8: Residential Design that Complements the Natural Environment.** The County shall encourage discretionary development that incorporates design features that provide a harmonious relationship between adjoining uses and the natural environment. (RDR) *[Source: Existing Lake Sherwood/Hidden Valley Area Plan Policy 1.1.2.5, Oak Park Area Plan Policy 3.3.2.3, modified]*
- ▶ **Policy LU-16.9: Building Orientation and Landscaping.** The County shall encourage discretionary development to be oriented and landscaped to enhance natural lighting, solar access, and passive heating or cooling opportunities to maximize energy efficiency. (RDR) *[Source: Existing GPP Policy 1.9.2.5, modified]*
- ▶ **Policy LU-17.4: New Incompatible Land Uses.** The County shall prohibit the introduction of new incompatible land uses and environmental hazards that would have health implications into or abutting existing residential areas, in particular within designated disadvantaged communities. (RDR, MPSP, PSR) *[Source: New Policy]*
- ▶ **Policy LU-17.5: Placement of New Residential Uses.** Within designated disadvantaged communities, the County shall discourage the establishment of new residential and other sensitive land uses near incompatible industrial land uses unless appropriate mitigations or design consideration can be included. (RDR, MPSP, PSR) *[Source: New Policy]*

Implementation Programs

- ▶ **Implementation Program A: Guidelines for Orderly Development Implementation.** The County shall continue to implement the Guidelines for Orderly Development and work with cities to promote orderly and compact, increased options for affordable housing, lower vehicle miles traveled, and limit sprawl. *[Source: New Program]*
- ▶ **Implementation Program B: General Plan Consistency.** The County shall review and amend, as necessary, applicable ordinances and regulations to ensure consistency with the General Plan, including the Zoning Ordinances and Building Code. *[Source: New Program]*

- ▶ **Implementation Program F: Comprehensive Area Plan Updates.** The County shall review and periodically prepare a comprehensive update to each of the Area Plans to ensure that they reflect community needs and expectations. *[Source: New Program]*
- ▶ **Implementation Program G: Update Coastal Area Plan.** The County shall move General Plan policies specific to the Coastal Zone to the Coastal Area Plan as part of the next Coastal Area Plan update. *[Source: New Program]*

Circulation, Transportation, and Mobility Element

- ▶ **Policy CTM-1.10: Direct Traffic to Highways to Preserve County Character.** The County shall strive to direct interregional traffic to federal and state highways. Improvement to County roadways shall not be for the primary purpose of relieving congestion on federal or state highways. (SO) *[Source: Existing GPP Policy 4.2.2.1, modified]*
- ▶ **Policy CTM-2.11: Efficient Land Use Patterns.** The County shall establish land use patterns that promote shorter travel distances between residences, employment centers, and retail and service-oriented uses to support the use of public transportation, walking, bicycling, and other forms of transportation that reduce reliance on single-passenger automobile trips. (RDR, MPSP) *[Source: New Policy]*

Public Facilities, Services, and Infrastructure Element

- ▶ **Policy PFS-5.2: Land Use Compatibility with Solid Waste Facilities.** The County shall review and condition discretionary development near landfills and other solid waste processing and disposal facilities (including facilities for composting, green waste, food waste) to avoid incompatible development and future nuisance complaints from encroachment by incompatible land uses. (RDR) *[Source: New Policy]*

Conservation and Open Space Element

- ▶ **Policy COS-4.2: Cooperation for Cultural, Historical, Paleontological, and Archaeological Resource Preservation.** The County shall cooperate with cities, special districts, other appropriate organizations, and private landowners to identify and preserve the county's cultural, historical, paleontological, and archaeological resources. (IGC) *[Source: Existing GPP Goal 1.8.1.2, modified]*
- ▶ **Policy COS-4.3: Historical Landmarks Preservation.** The County shall require all structures and sites that are designated, or being considered for designation, as County Historical Landmarks to be preserved as a condition of discretionary development, in accordance with the Secretary of the Interior Standards, unless a structure is unsafe or deteriorated beyond repair. The property owner shall place an appropriate marker on the site to describe the historical significance of the structure, site or event. (RDR) *[Source: Existing Oak Park Area Plan Policy 1.5.2.2, Ojai Valley Area Plan Policy 1.7.2.2, and Thousand Oaks Area Plan Policy 1.5.2.2, modified]*
- ▶ **Policy COS-4.4: Discretionary Development and Cultural, Historical, Paleontological, and Archaeological Resource Preservation.** The County shall require discretionary development be assessed for potential cultural, historical, paleontological, and archaeological resources by a qualified professional and be designed to avoid impacts to these resources whenever to the maximum extent feasible. Unavoidable impacts, whenever possible shall be reduced to a less than significant level and/or shall be mitigated by extracting maximum recoverable data. (RDR) *[Source: Existing GPP Policy 1.8.2.1,*

GPP Policy 1.8.2.2, Ojai Valley Area Plan Goal 1.7.1.2 and Policy 1.7.2.1, Thousand Oaks Area Plan Goal 1.5.1.4 and Policy 1.5.2.1, Oak Park Area Plan Policy 1.5.2.1, and Piru Area Plan Policy 1.4.2.2, modified]

- ▶ **Policy COS-4.5: Adaptive Reuse of Historic Structures.** The County shall encourage discretionary development to adaptively reuse architecturally or historically significant buildings if the original use of the structure is no longer feasible and the new use is allowed by the underlying land use designation and zoning district. (RDR) *[Source: New Policy]*
- ▶ **Policy COS-4.6: Architectural Design to Reflect Historic and Cultural Traditions.** The County shall encourage discretionary development to incorporate architectural designs and features that reflect the historical and cultural traditions characteristic to the area or community. (RDR) *[Source: Existing Piru Area Plan Policy 1.4.2.3, modified]*
- ▶ **Policy COS-6.5: Mineral Resource Land Use Compatibility.** The County shall ensure that discretionary development is compatible with mineral resources extraction and processing if the development is to be located in areas identified on the Mineral Resource Zone Maps prepared by the California Geological Survey or in County identified mineral resource areas. The County shall:
 1. Require an evaluation to ascertain the significance of the mineral resources deposit located in the area of a discretionary development and to determine if the use would significantly hamper or preclude access to or the extraction of mineral resources.
 2. Require discretionary development proposed to be located adjacent to existing mining operations to provide a buffer between the development and mining operations to minimize land use incompatibility and avoid nuisance complaints.
 3. Establish a buffer distance based on an evaluation of noise, community character, compatibility, scenic resources, drainage, operating conditions, biological resources, topography, lighting, traffic, operating hours, and air quality. (RDR) *[Source: New Policy]*

Hazards and Safety Element

- ▶ **Policy HAZ-1.4: Development in High Fire Hazard Severity Zones and Hazardous Fire Areas.** The County shall require the recordation of a Notice of Fire Hazard with the County Recorder for all new discretionary entitlements (including subdivisions and land use permits) within areas designated as Hazardous Fire Areas by the Ventura County Fire Department or High Fire Hazard Severity Zones by the California Department of Forestry and Fire Protection (CAL FIRE). (RDR) *[Source: New Policy]*
- ▶ **Policy HAZ-2.3: Incompatible Land Uses in Floodplains.** The County shall prohibit incompatible land uses and limit discretionary development within floodplains. (RDR) *[Source: Existing GPP Goal 2.10.1.3 and Policy 2.10.2.1, modified]*
- ▶ **Policy HAZ-4.10: Development in Landslide/Debris Flow Hazard Areas.** The County shall not allow development in mapped landslide/debris flow hazard areas unless a geologic and geotechnical engineering investigation is performed and appropriate and sufficient safeguards, based on this investigation, are incorporated into the project design. (RDR) *[Source: Existing GPP Policy 2.7.2., modified]*

- ▶ **Policy HAZ-6.1: Airport Land Use Plan.** The County shall regulate land use types, density, and intensity using guidance from the Ventura County Comprehensive Airport Land Use Plan, Point Mugu Air Installations Compatible Use Zones (AICUZ) study, State Aeronautics Act, and California Airport Land Use Planning Handbook guidelines. (RDR) *[Source: New Policy]*
- ▶ **Policy HAZ-6.2: Airport Safety Zones.** The County shall require density and allowed uses within the Airport Safety Zones to be as defined in the Ventura County Airport Comprehensive Land Use Plan (ACLUP) and the current Point Mugu Air Installations Compatible Use Zones (AICUZ) study, as applicable to the project location. The County shall require any overrides of a determination of inconsistency with the ACLUP to be done in accordance with state law. (RDR) *[Source: New Policy]*
- ▶ **Policy HAZ-9.6: Airport Noise Compatibility.** The County shall use the aircraft noise analysis prepared for local airports or the noise contours from the current Point Mugu Air Installations Compatible Use Zones (AICUZ) study, as most appropriate for a project location, as an accurate mapping of the long-term noise impact of the airport's aviation activity. The County shall restrict new discretionary residential land uses to areas outside of the 60 decibel Community Noise Equivalence Level (dB CNEL) aircraft noise contour unless interior noise levels can be mitigated to meet a maximum 45 dB CNEL. (RDR) *[Source: New Policy, NBVC JLUS]*

Agriculture Element

- ▶ **Policy AG-1.2: Agricultural Land Use Designation.** The County shall ensure that discretionary development located on land designated as Agricultural on the General Plan Land Use Diagram and identified as Prime Farmland or Farmland of Statewide Importance on the State's Important Farmland Inventory is planned and designed to remove as little land as possible from potential agricultural production and to minimize impacts on topsoil. (RDR, MPSP) *[Source: Existing GPP Policy 1.6.2.1, modified, SOAR]*
- ▶ **Policy AG-2.1: Discretionary Development Adjacent to Agriculturally Designated Lands.** The County shall ensure that discretionary development adjacent to Agriculturally designated lands does not conflict with agricultural use of those lands. (RDR) *[Source: Existing GPP Policy 1.6.2.6, SOAR]*

Economic Vitality Element

- ▶ **Policy EV-1.8: Encourage Development Efficiency.** The County shall coordinate and work with cities in the county to enhance the efficiency of development of remaining vacant commercial and industrial sites and encourage infill and revitalization of underutilized sites. (MPSP, IGC) *[Source: VCEVSP A5]*

Implementation Programs

- ▶ **Implementation Program C: Promote Infill and Revitalization.** The County shall prepare development standards, including those that provide for adequate infrastructure, for development on remaining vacant commercial and industrial sites to encourage infill and revitalization of underutilized sites. *[Source: VCEVSP A.5]*

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.11-1: Result in Physical Development That Is Incompatible With Land Uses, Architectural Form Or Style, Site Design/Layout, Or Density/Parcel Sizes Within Existing Communities

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

One of Ventura County's distinguishing characteristics is its open space and scenic character. Existing urban development within the county is focused near existing cities and within or near Existing Community boundaries to preserve the working and rural landscapes, agricultural lands, scenic vistas, natural resources, and recreational opportunities. Areas designated as greenbelts within the county protect open space and agricultural lands to prevent premature conversion to uses incompatible with agricultural uses. In addition, the Guidelines for Orderly Development and County's SOAR initiative promotes orderly and compact development within the county. The Guidelines for Orderly Development promote and maintain reasonable city boundaries and Spheres of Influence to prevent growth-inducing urban development in unincorporated areas and require unincorporated urban development to be located in areas within Existing Community boundaries and unincorporated urban centers. Urban development is defined as areas where the building intensity is greater than one principal dwelling unit per 2 acres.

The Existing Community designation identifies existing urban residential, commercial, or industrial enclaves located outside Urban-designated areas. The Existing Community designation applies to areas that include uses, densities, building intensities, and zoning designations that are normally found in Urban-designated areas, but which do not qualify as urban centers. The County established this designation to recognize existing uses in unincorporated areas that have been developed with urban building intensities and urban land uses; to contain these enclaves within specific areas to prevent further expansion; and to limit the building intensity and land use to previously established levels to minimize incompatible land uses in these areas. The unincorporated county contains a wide array of housing types – from urban multifamily complexes along the coast and in some Existing Communities to rural residential uses on large acreages. The various densities of residential development in the county not only provide housing choices, but their locations and designs play a critical role in the character and quality-of-life of county residents.

The 2040 General Plan would accommodate future development primarily within existing unincorporated communities. By making refinements to the Existing Community and Urban land use designations of the existing general plan, the 2040 General Plan would more clearly distinguish among land uses allowed within each designation and set forth maximum development density and intensity standards. Specifically, the 2040 General Plan would establish 13 new land use designations that provide more detailed information on the types of land uses (e.g., commercial, industrial, residential) that would be allowable within areas currently designated as Existing Community and Urban (Table 4.11-1). The refined land use designations of the 2040 General Plan would result in future development that is compatible with the land uses, densities, and parcel sizes of existing communities.

Table 4.11-1 Existing General Plan Land Use Designations and Proposed New General Plan Land Use Designations

Acronym	Land Use Designation	Max. Density/ Intensity	Min. Lot Size
Existing General Plan Land Use Designations to Remain			
RUR	Rural	1 du/2 ac (1 dwelling unit per each 2 acres)	2 acres
AG	Agricultural	1 du/40 ac	40 acres
OS	Open Space	1 du per parcel	10 acres, or 20 acres if contiguous w/Agricultural
P	State or Federal Facility (updated to State, Federal, and Other Public Lands)	N/A	None
Proposed New Land Use Designations (to be applied only to areas with current Existing Community or Urban land use designations)			
ECU-R	ECU-Rural	1 du/2 ac	2 acres
ECU-A	ECU-Agricultural	1 du/40 ac	40 acres
ECU-OS	ECU-Open Space	1 du per parcel	10 acres, or 20 acres if contiguous w/Agricultural
VLDR	Very Low Density Residential	3 du/ac	10,000 SF
LDR	Low-Density Residential	5 du/ac	6,000 SF
MDR	Medium-Density Residential	13 du/ac	3,000 SF
RHD	Residential High-Density	20 du/ac	No Minimum
RPD	Residential Planned Development	20 du/ac	No Minimum

Acronym	Land Use Designation	Max. Density/ Intensity	Min. Lot Size
MU	Mixed Use	20 du/ac; 60% coverage	No Minimum
C	Commercial	60% coverage	No Minimum
CPD	Commercial Planned Development	60% coverage	No Minimum
I	Industrial	50% coverage	10,000 SF
PR	Parks & Recreation	N/A	N/A

The 2040 General Plan would not make changes to the following existing land use designations:

- ▶ Agricultural, Open Space, or Rural land use designations located outside of Existing Community and Urban designated area (consistent with the SOAR initiative); and
- ▶ State and Federal Facility Designation since they apply to parcels owned by the State or federal government and are outside of the County's land use jurisdiction.

Potential impacts affecting architecture and style fall into three categories: historic character, architecture, and public spaces. Section 2.4 of the Land Use Element of the 2040 General Plan includes policies that focus on preserving agricultural, rural, and open space lands while actively investing in enhancing existing communities and urban areas. This section promotes attractive communities with a distinct sense of place. For example, Policy LU-16.1 encourages discretionary development to be designed to maintain the distinctive character of unincorporated communities, to ensure adequate provision of public facilities and services, and to be compatible with neighboring uses. This would ensure that future discretionary projects are developed with architecture character consistent with existing development. In addition, Policies COS-4.2 through COS-4.6 in the Conservation and Open Space Element would result in continued preservation and enhancement of the character of historic areas and resources within the plan area by requiring the County to cooperate with cities, special districts, other appropriate organizations, and private landowners to identify and preserve the county's cultural, historical, paleontological, and archaeological resources; require all structures and sites that are designated, or being considered for designation, as County Historical Landmarks to be preserved as a condition of discretionary development; and encourage discretionary development to incorporate architectural designs and features that reflect the historical and cultural traditions characteristic to the area or community.

Goal LU-16 of the 2040 General Plan is to enhance the character and design of unincorporated communities in the county to cultivate self-contained communities designed to meet the daily needs of Ventura County residents. Policy LU-11.3 encourages compatible site layout/design by requiring commercial and industrial discretionary development to be designed to provide adequate buffering (e.g., walls, landscaping, setbacks), and minimize adverse impacts (e.g., noise, glare, and odors) on adjoining and adjacent residential areas. Policies LU-15.5 through LU-15.8 and LU-16.1 through LU-16.6 encourage the development of an appropriately-scaled land use mix in each designated Area Plan and enhance the character and design of unincorporated communities in the county. In addition, Policies LU-16.8 and LU-16.9 require the County to encourage discretionary development to incorporate design features that provide a harmonious relationship between adjoining uses and the natural environment, and to orient and landscape to enhance natural lighting, solar access, and passive heating or cooling opportunities to maximize energy efficiency.

As shown under “2040 General Plan Policies and Implementation Programs,” above, numerous policies in the 2040 General Plan would minimize future incompatibilities by requiring consideration of density and/or intensity of allowed uses within each land use designation. For example, Policies LU-4.1 and LU-4.2 would reduce incompatible land uses by specifying densities and/or intensities of allowed uses within each land use designation and maintaining continuity with neighboring zoning, land uses, and parcel sizes. Policies LU-6.1, LU-7.1 through 7.3, and LU-8.1 -8.4 reduce incompatible uses within agricultural areas by specifying buffers, allowable coverage, and allowable uses within those areas. Policies LU-11.1 through LU-11.8 promote development of mixed-use, commercial, and industrial uses in areas that are appropriate for these uses, thereby reducing the potential for incompatible land uses by directing land uses that are consistent with the proposed development type and density.

The 2040 General Plan also includes policies addressing land use compatibility in the Public Facilities, Services, and Infrastructure Element; Conservation and Open Space Element; and Hazards and Safety Element related to locating public facilities such as solid waste facilities (Policy PFS-5.2), airports (Policies HAZ-6.1, HAZ-6.2, and HAZ-9.6), and natural resources such as mineral resources (Policy COS-6.5) near compatible land uses. These policies direct development of more intensive land uses that could affect adjacent land uses (e.g., noise, odors, traffic impacts) away from incompatible land uses or incorporate buffers to minimize incompatible uses. Policies HAZ-1.4 and HAZ-2.3 would discourage development of incompatible land uses in areas with designated safety hazards such as high fire hazard or flooding. In addition, Policy LU-17.4 states that the County shall prohibit the introduction of new incompatible land uses into or abutting existing residential areas, in particular within designated disadvantaged communities. Areas designated as greenbelts within the county protect open space and agricultural lands to prevent premature conversion to uses incompatible with agricultural uses. Through greenbelt agreements, cities express commitments not to annex any property within a greenbelt while the County agrees to restrict development to uses consistent with zoning designations.

Article 4: Permitted Uses of the Ventura County Coastal Zoning Ordinance and Article 4: Purposes of Zones of the Ventura County Non-Coastal Zoning Ordinance designate allowable uses. Article 5: Development Standards/Conditions of the Ventura County Coastal Zoning Ordinance and Article 6: Lot Area and Coverage, Setbacks, Height and Related Provisions of the Ventura County Non-Coastal Zoning Ordinance specifies standards for setbacks, building heights, and lot coverage, which further restrict the development allowed is compatible with surrounding land uses.

Because the policies and programs in the 2040 General Plan would not result in physical development that is incompatible with existing land uses, architectural form or style, site design/layout, or density/parcel sizes within existing communities, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.11-2: Result in Physical Development That Would Divide An Established Community
Established communities for the purpose of this analysis include unincorporated urban centers within the Urban area designation, and areas within the Existing Community area designation. Unincorporated urban centers within the Urban area designation have a building intensity greater than one principal dwelling unit per two acres.

The Existing Community area designation recognizes existing land uses in unincorporated areas with urban building intensities and urban land uses. Future development and other physical changes under the 2040 General Plan have the potential to divide an established community if infrastructure (e.g., roadways, utilities) or other incompatible land uses (e.g., airports) are developed within an established community. The 2040 General Plan would accommodate future development within established communities where public infrastructure and services already exist. As described above under Impact 4.11-1, there are numerous policies in the 2040 General Plan that would provide for land use compatibility to ensure that established communities remain intact while accommodating future development and other physical changes that would occur under the 2040 General Plan. The 2040 General Plan would retain the current boundaries assigned to the Existing Community and Urban land use designations to ensure consistency with the Guidelines for Orderly Development.

Policy LU-1.1 states the County shall continue to promote orderly and compact development. Policy LU-3.1 further states that the Existing Community area designation, referred to in the SOAR initiative, identifies existing urban residential, commercial, or industrial enclaves outside of incorporated areas and unincorporated urban centers. The Existing Community area designation recognizes existing land uses in unincorporated areas that have been developed with urban building intensities and urban land uses, contains these enclaves within specific areas to prevent further expansion, and limits the building intensity and land use to previously established levels.

Policy CTM-5.5 states that discretionary development that would endanger the efficient, safe operation of an airport or would result in significant land use incompatibility impact with an airport shall be prohibited. Policy HAZ-6.7 states that the County shall condition discretionary development to minimize, to the maximum extent practical through site design or setbacks, the risk for exposure to railroad and trucking hazards. Policy LU-17.4 states that the County shall prohibit the introduction of new incompatible land uses into or abutting existing residential areas, in particular within designated disadvantaged communities.

By promoting land use compatibility, the 2040 General Plan minimizes the potential for allowing future development or other physical changes that would physically divide an established community. Therefore, established communities would not be physically divided, but instead, growth and expansion would be facilitated and organized in an efficient manner. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.11-3: Cause an Environmental Impact Due To A Conflict With A Regional Plan, Policy, or Program

The 2040 General Plan is a policy document intended to guide land use decisions within the plan area (i.e., unincorporated Ventura County) through the year 2040. The RTP/SCS and Airport Comprehensive Land Use Plans are regional plans that have been adopted for the purpose of avoiding or mitigating environmental effects and are relevant to the plan area of the 2040 General Plan.

Additionally, a Regional Housing Needs Assessment (RHNA) is mandated by State housing law as part of the periodic process of updating local housing elements of the General Plan.

The State agency, California Department of Housing and Community Development (HCD), will assign an allocation of housing units to the SCAG region and SCAG will draft a methodology to distribute the allocated units to all the jurisdictions. The current 2014 –2021 Housing Element was certified by HCD on December 2013, which means that the County provided evidence of sufficient capacity to meet State requirements to accommodate housing needs. The next cycle of housing element updates for cities and counties within the SCAG area will cover the planning period from 2021 to 2029. As part of this process, SCAG will work with the County and the cities within the county to develop a methodology to distribute the RHNA as determined by HCD. Implementation of the 2040 General Plan policies and programs listed above, coordination of the RHNA with housing element updates, and compliance with applicable regulations would ensure that development under the 2040 General Plan is consistent with the RHNA.

SCAG is the metropolitan planning organization for the counties of Ventura, Imperial, Los Angeles, Orange, Riverside, and San Bernardino. In April 2016, SCAG adopted the 2016-2040 RTP/SCS, which is a long-range plan with a combination of transportation and land use strategies to achieve the region's goals of balancing future mobility and housing needs with economic, environmental, and public health goals. The preferred scenario in the 2016 RTP/SCS includes a significant portion of residential and commercial growth in High-Quality Transit Areas and Transit Priority Areas. For planning purposes, High-Quality Transit Areas are defined as an area within 0.5-mile of a well-serviced fixed guideway transit stop, and it includes bus transit corridors where buses pick up passengers every 15 minutes or less during peak commute hours. A Transit Priority Areas is defined as location where two or more high-frequency transit routes intersect. The RTP/SCS complements its focus on transit-oriented infill with a strong conservation framework that emphasizes redirecting growth from high-value agricultural and natural open space areas to existing urbanized areas. In doing so, it recognizes Ventura County's SOAR Initiative as an important safeguard in protecting agricultural and open space assets.

SCAG developed and adopted the 2016 RTP/SCS, which identifies regional transportation improvements needed to improve system maintenance and operations and mobility and accessibility countywide. The 2040 General Plan's Circulation, Transportation, and Mobility Element would be consistent with the goals of the 2016 RTP/SCS. Policies and programs in the Circulation, Transportation, and Mobility Element would require coordination with Caltrans, SCAG, Ventura County Transportation Commission, and cities to plan, develop, and maintain regional transportation facilities and services, and to identify existing and future transportation corridors (Policy CTM-2.6); provide a regional multimodal system (Policies CTM-2.11 through CTM-2.22); and discourage approval of projects that would have significant transportation impacts (Policy CTM-1.2). The environmental impacts of the 2040 General Plan Circulation, Transportation, and Mobility Element are addressed throughout Chapter 4 of this Draft EIR. Specifically, impacts relating to air quality, energy use, greenhouse gas emissions, noise, and traffic are addressed in Sections 4.3, "Air Quality;" 4.6, "Energy;" 4.8, "Greenhouse Gas and Climate Change;" 4.13, "Noise;" and 4.16, "Transportation and Circulation." In addition, although overall traffic levels are likely to increase with projected population growth, the 2040 General Plan includes goals, policies, and implementation programs that would address increases in traffic.

Future development under the 2040 General Plan would also be subject to the Land Use and Community Character Element policies and implementation programs that emphasize efficient use of land and infrastructure and walkable neighborhoods (Policy LU-1.4), encourage infill

development within Existing Communities and within or adjacent to existing development (Policy LU-1.5), and promote ease of pedestrian/bicycle access to encourage walk-in business (Policy LU-16.5). Furthermore, Policy LU-1.3 states the County shall coordinate with SCAG to direct State regional housing needs allocations predominantly to cities to ensure consistency with the County's SOAR initiative and the SCAG's SCS.

These policies and corresponding implementation programs promote mixed-use and infill development, reduce VMT, and promote the development, enhancement, and funding alternate methods of transportation. These policies are aligned with the goals of the RTP/SCS described above. Also, consistent with the RTP/SCS, the 2040 General Plan provides guidance in determining the appropriate or desirable locations for this growth, thereby preventing an unnecessarily scattered pattern of development, which often results in extraordinary demands on public services, above average public service costs and unnecessary and avoidable destruction or degradation of valuable resources.

The Ventura County Airport Land Use Commission adopted the Airport Comprehensive Land Use Plan for Ventura County in July 2000. The purpose of the Airport Comprehensive Land Use Plan for Ventura County is to promote the safety and welfare of residents near military- and public-use airports. The plan seeks to protect the public from the adverse effects of aircraft noise, to prevent concentration of people and facilities in areas that are susceptible to aircraft accidents, and to ensure that no structures or activities encroach upon or adversely affect the use of navigable airspace. The plan considers land use compatibility of surrounding land uses with airport noise levels, with respect to the safety of persons, and protection of airspace needed for safe navigation. Refer to Section 4.9, "Hazards, Hazardous Materials, and Wildfire," for discussion of aircraft-related hazards and Section 4.13, "Noise and Vibration," for discussion of aircraft-related noise impacts. In addition, the County has agreements with the Cities of Oxnard and Camarillo to work together to recommend standards for compatibility of land uses developed surrounding airports. The County and Cities also request input from the Airport on land use approvals. The Airport compares the proposed land uses to the Airport Comprehensive Land Use Plan and makes recommendations. Those recommendations are reviewed and approved by the Aviation Advisory Commission, Airport Authority, Caltrans Aeronautics, and the Airport Land Use Commission. The recommendations are then provided the County or City and incorporated as requirements for permit approval.

The 2040 General Plan includes policies to ensure compatible land use with airports consistent with the Airport Comprehensive Land Use Plan including Policies HAZ-6.1 through HAZ-6.8 and Policy HAZ-9.6 that require the County to regulate land use types, density, and intensity using guidance from the Ventura County Comprehensive Airport Land Use Plan, Point Mugu Air Installations Compatible Use Zones study, State Aeronautics Act, and California Airport Land Use Planning Handbook guidelines, and address airport noise and airport safety related to approving land uses adjacent to airports.

Because the 2040 General Plan includes policies consistent with the RHNA, RTP/SCS, and the Airport Comprehensive Land Use Plan and requires coordination with these regional plans and programs, implementation of the 2040 General Plan would not cause a significance environmental impact due to a conflict with an applicable regional plan, policy or program. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

4.12 MINERAL AND PETROLEUM RESOURCES

This section evaluates the potential effects of implementing the 2040 General Plan on mineral and petroleum resources, including the potential to hamper or preclude the extraction of, or access to, these resources. As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments on the notice of preparation (NOP) included concerns regarding the sustainability of the oil and gas industry; effects of oil and gas exploration and production on climate change, water quality, water supply, traffic, noise, odors, aesthetics, and hazards; renewal of drilling permits, compliance with new policies, and use of best management practices; and the effects of importing oil and gas compared to producing it locally in the county. These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

In addition, these topics are typically outside the aspects of impacts to petroleum and mineral resources evaluated in this section pursuant to the thresholds established below in accordance with the County of Ventura’s adopted Initial Study Assessment Guidelines (ISAG) and Appendix G of the State CEQA Guidelines. However, in order to have a comprehensive discussion of the potential environmental effects of new policies related to oil and gas development in the county, indirect effects in the areas of climate change, transportation, water supply and quality, noise, air quality, odors, aesthetics, and hazards are discussed in this section. To the extent that extraction of mineral resources under the 2040 General Plan could have effects on other environmental resources, these items are addressed in the respective resource sections of this draft EIR.

4.12.1 Background Report Setting Updates

REGULATORY SETTING

In addition to the information provided in Section 8.4, “Mineral Resources,” Section 8.5, “Energy Resources,” and Section 10.2 “Legal and Regulatory Framework for Water Management (Class II Underground Injection Control Program),” of the Background Report (Appendix B), the following information is relevant to understanding and evaluating the impacts of the 2040 General Plan on petroleum resources. This information goes beyond consideration of whether the laws and regulations pertain to precluding petroleum development, but they are included in this chapter for completeness.

Federal Laws and Regulations

Federal laws and regulations do not preclude access to petroleum resources, but are provided here to provide greater context on the regulatory framework governing oil and gas production and transport.

Gas Pipelines

Natural gas pipeline safety is managed by the Office of Pipeline Safety (OPS), U.S. Department of Transportation (DOT) Pipeline and Hazardous Material Safety Agency (PHMSA) and operators must follow the regulations in 49 CFR 192.1 to 192.1015, *Transportation of Natural and Other Gas by Pipeline*. OPS is responsible for regulating the safety of natural gas transportation pipelines, including safety aspects related to design, construction, operation, and maintenance. Minimum safety requirements for gas pipelines are described in the Code of Federal Regulations 49 CFR Parts 191, 192 and 193. Under 49 CFR 191, significant natural gas pipeline incidents are required to be reported to the PHMSA of the DOT.

Since 2003, OPS implemented the Integrity Management Program (IMP), described in 49 CFR 192 Subpart O. This regulation requires pipeline operators to assess, identify, and address the safety of pipeline segments that are located in areas where the consequences of a pipeline failure could be significant. Under the IMP, pipeline operators are required to: identify all segments of the pipeline that pass through a high consequence area, conduct a baseline assessment of the integrity of these segments, address any safety issues, reassess the integrity of the pipeline at intervals not to exceed 5 years, and establish performance measures to assess the program's effectiveness.

California Laws and Regulations

The following State laws address gas and liquid pipelines, oil and gas facilities, and hazardous materials and waste. With the exception of coastal and non-coastal zoning ordinances, these state laws and regulations do not preclude access to petroleum resources, but are provided here to provide greater context on the regulatory framework governing oil and gas production and transport.

California Pipeline Safety Act of 1981

This Act gives regulatory jurisdiction to the State Fire Marshal for the safety of all intrastate hazardous liquid pipelines and all interstate pipelines used for the transportation of hazardous or highly volatile liquid substances. The law establishes the governing rules for interstate pipelines to be the federal Hazardous Liquid Pipeline Safety Act and federal pipeline safety regulations.

Recent amendments require pipelines to include means of leak prevention and cathodic protection, with acceptability to be determined by the State Fire Marshal. All new pipelines must also be designed to accommodate passage of instrumented inspection devices (smart pigs) through the pipeline.

California Public Utilities Commission General Order No. 112-F, State of California Rules Governing Design, Construction, Testing, Operation, and Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems

The purpose of General Order No. 112-F is to establish, in addition to the Federal Pipeline Safety Regulations, minimum requirements for the design, construction, quality of materials, locations, testing, operations and maintenance of facilities used in the gathering, transmission, and distribution of gas to safeguard life or limb, health, property and public welfare and to provide that adequate service will be maintained by gas operators under the jurisdiction of the CPUC. General Order No. 112-F is incorporated in addition to the Federal Pipeline Safety Regulations, specifically, Title 49 of the Code of Federal Regulations (49 CFR), Parts 191, 192, 193, and 199, which also govern the Design, Construction, Testing, Operation, and

Maintenance of Gas Piping Systems in the State of California. General Order No. 112-F does not supersede the Federal Pipeline Safety Regulations, but rather supplements the federal regulations.

Ventura County Air Pollution Control District Rule No. 71.1 - Crude Oil Production and Separation and Rule No. 54 - Sulfur Compounds

The Ventura County Air Pollution Control District (VCAPCD) regulates flaring at oil and gas facilities through its rules, regulations, monitoring and permitting programs. VCAPCD Rule 71.1 applies to equipment used in the production, gathering, storage, processing, and separation of crude oil and natural gas from petroleum production permitted units. Pursuant to this rule, venting of organic gases to the atmosphere is prohibited; therefore, 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. Exemptions from this rule are provided, including those for tanks installed prior to 1978 and temporary tanks. Rule 54 applies to any person who discharges sulfur compounds into the atmosphere from any source whatsoever.

Primary (Non-Emergency) Flares

The VCAPCD has determined that flares rated at or greater than 1 million Btu per hour (MMBtu/hr) are considered “primary flares” subject to VCAPCD permit requirements and permitted emissions pursuant to VCAPCD Rule 29, “Conditions on Permits.” Rule 29 requires that the VCAPCD permit for a flare include permitted emissions and a permit condition that limits the annual gas consumption in both the flare, and the flare’s gas pilot, if applicable. The VCAPCD permit places a gas consumption limit on routine flaring and “planned flaring events” identified in the operator’s Planned Flaring Management Plan. These flaring events include, but are not limited to, routine flaring to comply with Rule 71.1, flaring due to planned maintenance performed on wells, equipment, or pipelines by the operator or performed by another operating accepting the produced gas. “Unplanned Flaring” or flaring events include the unplanned burning of gas for emergency or safety concerns as a result of an unforeseen process upset or an equipment malfunction or breakdown. Rule 54 stipulates that unplanned flaring events shall not exceed 24 hours in duration and if the flaring event exceeds 1 hour in duration, the operator shall: (1) notify the VCAPCD as soon as reasonably possible, but no later than 4 hours after its detection by the operator; (2) submit a report to the VCAPCD within one week after the flaring event with an estimate of sulfur emissions, and pictures or descriptions of the equipment or controls that failed; and (3) immediately undertake appropriate corrective measures to come into compliance with Rule 54 (B.1) and (B.2), which set forth the acceptable permitted levels of discharge of sulfur compounds and sulfur dioxide.

Emergency Flares

Flares rated at less than 1 MMBTU/hr and used exclusively for emergency standby for the disposal of process gases in the event of unavoidable process upsets, are considered “emergency flares” and exempt from VCAPCD permits (Rule 23.A.4 and Rule 23.C.1). While these flares are exempt from the requirements of Rule 29 permitted emissions, they may be listed on an oil and gas operator’s Permit to Operate for enforcement purposes.

Permitted Flaring Variances

In the event an oil and gas operator is required to conduct additional flaring from a primary or emergency flare above and beyond VCAPCD permitted levels, a variance may be granted on a case-by-case basis through the VCAPCD Hearing Board. This variance may be granted when

an VCAPCD permittee is out of compliance with a District Rule (permit condition etc.) and in addition to seven specific findings demonstrates that the conditions requiring excess flaring were beyond the reasonable control of the petitioner, the petitioner has given consideration to curtailing operations of the source in lieu of obtaining a variance, and the petitioner will reduce excess emissions to the maximum extent feasible during the requested variance period. A variance is granted for a specified time period during which the VCAPCD will not take further enforcement action based on flaring conducted in accordance with the variance. Variances in which oil and gas flaring is requested typically are a result of gas sales pipeline maintenance and/or to dispose of produced gas or transfer oil product to an oil sales pipeline.

Non-Coastal and Coastal Zoning Ordinances

Section 8107-5.5 of the Non-Coastal Zoning Ordinance (NCZO), and Section 8175-5.7.7 of the Coastal Zoning Ordinance (CZO), establish oil development guidelines, which are applied to oil development authorized by new discretionary permits or permit modifications whenever physically and economically feasible and practicable. NCZO Section 8107-5.5.5, and CZO Section 8175-5.7.7(e), state that pipelines should be used to transport petroleum products offsite to promote traffic safety and air quality. As feasible, pipelines must be consolidated with existing pipelines and routed to avoid important resource areas. NCZO Section 8107-5.5.7, and CZO Section 8175-5.7.7(g), state that gas from wells should be piped to centralized collection and processing facilities, rather than being flared, to preserve energy resources and air quality, and to reduce fire hazards and light sources. NCZO Section 8107-5.5.8, and CZO Section 8175-5.7.7(h), state that wells should be located a minimum of 800 feet from occupied sensitive uses and that private access roads to drill sites should be located a minimum of 300 feet from occupied sensitive uses, unless this requirement is waived by the occupant. NCZO Section 8107-5.6.1, and CZO Section 8175-5.7.8(a), require the following setbacks for well drilling and equipment:

- ▶ 100 feet from any dedicated public street, highway, or nearest rail of a railway being used as such, unless the new well is located on an existing drill site and the new well would not present a safety or right-of-way problem.
- ▶ 500 feet from any building or dwelling not necessary to the operation of the well, unless a waiver is signed allowing the setback to be reduced; in no case can the well be located less than 100 feet from said structures.
- ▶ 500 feet (under the NCZO) or 800 feet (under the CZO) from any institution, school, or other building used as a place of public assemblage, unless a waiver is signed allowing the setback to be reduced. However, in no case shall any well be located less than 300 feet from said structures.
- ▶ 300 feet from the edge of the existing banks of "Red Line" channels as established by the Ventura County Watershed Protection District and 100 feet from the existing banks of all other channels, including any marsh, small wash, intermittent lake, intermittent stream, spring or perennial stream, unless a qualified biologist determines that there are no significant biological resources present or that this standard setback should be adjusted.

Additionally, NCZO Section 8107-5.6.26 Application of Sensitive Use Related Standards requires that the imposition of regulations on petroleum operations, which are based on distances from occupied sensitive uses, shall only apply to those occupied sensitive uses which were in existence at the time the permit for the subject oil operations were approved.

ENVIRONMENTAL SETTING

In addition to the information provided in Section 8.4, “Mineral Resources,” and Section 8.5, “Energy Resources,” of the Background Report (Appendix B), the following information is relevant to understanding and evaluating the potential impacts of the 2040 General Plan on petroleum resources. The discussion goes beyond consideration of whether the 2040 General Plan would preclude access to petroleum resources in order to have a comprehensive discussion of the history and current conditions for petroleum production in the County.

History of Oil and Gas Permitting

The County of Ventura began requiring discretionary permits for oil and gas exploration and production activities and structures with adoption of the County's first zoning ordinance in 1947. Over time, the County's zoning ordinances and standard permits have become more stringent and detailed in their regulation of this land use. From 1947 through approximately 1966, the County granted discretionary "special use permits" (the predecessor to the County's "conditional use permits") authorizing oil and gas exploration and production. These permits describe, in general terms, the oil and gas-related activities and structures that are authorized under the permit and often apply to large permit areas. The permits typically do not state the maximum number or exact location of allowable wells or other structures, nor do they contain expiration dates by which the land use must end unless extended by the County.

From approximately 1966 through the 1970s, the County used a new discretionary conditional use permit form with more detailed and stringent conditions as compared to the special use permits. The conditional use permits from this era typically only authorize the drilling and operation of a limited number of drill sites, wells, and/or other structures; require discretionary County approval for all subsequent development; and contain permit expiration dates. Beginning in the early 1980's and continuing to the present, the County's conditional use permits typically specify the exact number and location of all authorized wells and other appurtenant structures; impose more detailed and comprehensive conditions; and contain permit expiration dates. When a permittee seeks to add new wells or otherwise engage in new development under conditional use permits granted by the County from approximately 1966 to present, the new development typically requires a discretionary permit modification.

There are currently 57 oil companies operating in Ventura County under the authority of 125 active County discretionary permits for oil and gas exploration and production. Of this total, approximately 35 have expiration dates during the planning period for the 2040 General Plan (i.e., 2020 through 2040) and approximately 75 permits have no specified expiration date. Ventura County Planning Division permit records indicate that the permits for the remainder of the operating wells either have expiration dates before 2020 or after 2040.

4.12.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

As described in Sections 8.4 and 8.5 of the Background Report, aggregates (sand and gravel) and petroleum (oil and gas) are the primary geological resources in Ventura County. Therefore, these resources are the focus of the following analysis. To determine the potential for the 2040 General Plan to conflict with the extraction of mineral resources, the proposed

land use diagram was compared to maps of aggregate resources maintained by the State (mineral resource zones mapped by the California Division of Mines and Geology [now known as the California Geological Survey]) and County (as Mineral Resource Protection [MRP] overlay zone) described in the Background Report. The potential for physical changes within identified mineral resource zones (MRZs) was determined using geographic information system software. Specifically, the analysis focused on MRZ-2 lands, which are identified in the County's NCZO with an MRP Overlay. Consistent with ISAG Section 3a, any land use proposed on or immediately adjacent to land zoned in the MRP Overlay designation or adjacent to a principal access road to a property with the boundaries of an existing conditional use permit for mineral (e.g., aggregate) resources extraction is considered to have the potential to hamper or preclude access to mineral resources.

Similarly, the evaluation of impacts on petroleum resources is based on the petroleum resources map (Figure 8-10 in the Background Report) and well data published by the State Division of Oil, Gas, and Geothermal Resources. These resources were compared to the proposed land use diagram in the geographic information system software to assess the overall proximity of potential land use changes to identified resource areas (i.e., oil fields and wells). Consistent with ISAG Section 3b, any land use designation that could result in development on or immediately adjacent to any known petroleum resource area, or adjacent to a principal access road to a property with an existing use permit for petroleum exploration and production, is considered to have the potential to hamper or preclude access to petroleum resources. The evaluation is program-level and identifies potential effects of the 2040 General Plan relative to existing conditions, based on reasonable inference and using readily available information. The evaluation also includes information about petroleum development and regulation in the County that is beyond the scope of evaluation of precluding access to petroleum resources, but is provided here to provide a comprehensive discussion.

THRESHOLDS OF SIGNIFICANCE

As discussed in the "Approach to the Environmental Analysis" section, the thresholds used to determine the significance of the 2040 General Plan's impacts are based on the County of Ventura's adopted ISAG, which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project's impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, the various thresholds provided in the ISAG were consolidated into a single impact statement for each of the resources. ISAG Section 3a, thresholds 1 and 2, and ISAG Section 3b, thresholds 1 through 3 regarding petroleum resources are evaluated together. In addition, language was added to emphasize that the analysis is relative to existing conditions. Appendix G questions XII(a) and XII(b) relate to availability of mineral resources and are evaluated as separate thresholds for mineral and petroleum resources.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant impact on mineral and petroleum resources if it 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.
- ▶ 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.
- ▶ 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.
- ▶ 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.

ISSUES NOT DISCUSSED FURTHER

The Area Plans for communities of El Rio/Del Norte, Lake Sherwood/Hidden Valley, North Ventura Avenue, Oak Park, Ojai Valley, Piru, and Thousand Oaks were reviewed for policies and implementation programs specific to these areas that would potentially have impacts on the environment with respect to mineral and petroleum resources. The 2040 General Plan would not result in substantive changes to Area Plan policies and implementation programs related to mineral and petroleum resources. The Area Plan policies and implementation programs related to these issues are consistent with the policies and implementation programs of the 2040 General Plan, which are addressed in the following impact discussions. Therefore, the environmental effects of the Area Plan policies and implementation measures are not addressed separately in this section.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to mineral and petroleum resources and, specifically, the thresholds of significance identified above, include the following:

Conservation and Open Space Element

- ▶ **COS-6.1: Balanced Mineral Resource Production and Conservation.** The County shall balance the development and conservation of mineral resources with economic, health, safety, and social and environmental protection values. (MPSP, IGC, RDR) [*Source: New Policy*]
- ▶ **COS-6.2: Significant Mineral Resource Deposits.** The County shall maintain maps of mineral resources deposits as identified by the California State Geologist as having regional or statewide significance and any additional deposits as may be identified by the County. The County shall provide notice to landowners and the general public on the

location of significant mineral resource deposits. (MPSP, PI) [Source: Existing GPP Goal 1.4.1.2, modified]

- ▶ **COS-6.3: Mineral Extraction Location Priority.** The County shall promote the extraction of mineral resources locally to minimize economic costs and environmental effects associated with transporting these resources. (IGC, JP) [Source: Existing GPP Goal 1.4.1.3, modified]
- ▶ **COS-6.4: Mineral Resource Area Protection.** Discretionary development within Mineral Resource Zones identified by the California Division of Mines and Geology shall be subject to the Mineral Resource Protection (MRP) Overlay Zone and is prohibited if the use will significantly hamper or preclude access to or the extraction of mineral resources. (RDR) [Source: Existing GPP Policy 1.4.2.8, modified]
- ▶ **COS-6.5: Mineral Resource Land Use Compatibility.** The County shall ensure that discretionary development is compatible with mineral resources extraction and processing if the development is to be located in areas identified on the Mineral Resource Zone Maps prepared by the California Geological Survey or in County identified mineral resource areas. The County shall:
 1. Require an evaluation to ascertain the significance of the mineral resources deposit located in the area of a discretionary development and to determine if the use would significantly hamper or preclude access to or the extraction of mineral resources.
 2. Require discretionary development proposed to be located adjacent to existing mining operations to provide a buffer between the development and mining operations to minimize land use incompatibility and avoid nuisance complaints.
 3. Establish a buffer distance based on an evaluation of noise, community character, compatibility, scenic resources, drainage, operating conditions, biological resources, topography, lighting, traffic, operating hours, and air quality. (RDR) [Source: New Policy]
- ▶ **COS-7.2: Oil Well Distance Criteria.** The County shall require new discretionary oil wells to be located a minimum of 1,500 feet from residential dwellings and 2,500 from any school. (RDR) [Source: New Policy]
- ▶ **COS-7.3: Compliance with Current Policies, Standards, and Conditions.** The County shall require new or modified discretionary development permits for oil and gas exploration, production, drilling, and related operations be subject to current State and County policies, standards, and conditions. (RDR) [Source: Existing GPP Policy 1.4.2.5, and Ojai Valley Area Plan Policy 1.3.2.9, modified]
- ▶ **COS-7.7: Conveyance for Oil and Produced Water.** 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. (RDR) [Source: New Policy]
- ▶ **COS-7.8: Gas Collection, Use, and Disposal.** 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. (RDR) [Source: Existing Ojai Valley Policy 1.3.2.2]

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.12-1: Result in Development on or Adjacent to Existing Mineral Resources Extraction Sites or Areas Where Mineral Resources Are Zoned, Mapped, or Permitted for Extraction, Which Could Hamper or Preclude Extraction of the Resources

As described in Section 8.4, “Mineral Resources,” of the Background Report, aggregate resources (i.e., construction-grade sand and gravel) are the primary mineral resources extracted in Ventura County. The State Geologist investigates and identifies lands in California underlain by mineral resources. Some of these lands are referred to the State Mining and Geology Board for MRZ designation based upon the known or inferred presence of mineral resources. The State Mining and Geology Board designates certain lands as MRZ-2 where they are underlain by mineral deposits of statewide significance. This designation information is transmitted to local governments for incorporation into general plans and implementing zoning ordinances.

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

Through Policy COS-6.2, the County would maintain maps of mineral deposits identified by the State Geologist as having regional or statewide significance and any additional deposits as may be identified by the County. MRZ-2 lands are identified in the County's NCZO with an MRP Overlay. As stated in NCZO Section 8104-7.2, the purpose of this overlay zone is to safeguard future access to the resources, facilitate the long-term supply of mineral resources in the county, and notify landowners and the public of the presence of the resources. As illustrated on Figure 8-9 of the Background Report, there is a band of MRZ-2 designated lands that roughly coincides with the Santa Clara River, extending from Piru, in the northeast, to Oxnard, in the southwest, that includes areas of Piru, Satcoy, and El Rio, which are designated for residential and industrial development in the proposed land use diagram.

Generally, the 2040 General Plan strives to balance the development and conservation of mineral resources with economic, health, safety, and social and environmental protection values (Policy 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 (Policy COS-6.3). As established in Policy COS-6.4, future discretionary development would continue to be subject to the provisions of the MRP Overlay, and such development would be prohibited if the use would substantially hamper or preclude access to, or the extraction of, mineral resources.

Pursuant to Policy COS-6.5, the County would promote mineral resource land use capacity by ensuring that discretionary development in areas designated MRZ-2 is compatible with mineral resources extraction and processing activities. Specifically, the County would require an evaluation of the significance of the mineral resources deposits located in the area of a proposed discretionary development and determine whether the use would significantly hamper or preclude access to, or the extraction of, mineral resources; and 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. This review would address discretionary development both on or adjacent to mineral extraction sites and adjacent to principal access roads to existing aggregate extraction or production sites.

With the implementation of policies proposed in the 2040 General Plan, the potential for development on or adjacent to mineral resources that are zoned, mapped, or permitted for extraction, which could hamper or preclude extraction of the resources, would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.12-2: 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

Future development that could be accommodated under the 2040 General Plan is described in Impact 4.12-1. Through 2040 General Plan Policies COS-6.1 and COS-6.3, the County seeks to balance the development and conservation of mineral resources with economic, health, safety, and social and environmental protection values while promoting the extraction of local mineral resources to minimize economic costs and environmental effects associated with importing

these resources from outside of the county, as discussed above. The 2040 General Plan would also include Policy COS-6.2, through which the County would maintain classification and designation reports and maps of mineral resources deposits recognized as having regional or statewide significance.

Also as stated above, the County's MRP Overlay, which prohibits discretionary development that would significantly hamper or preclude access to, or the extraction of, mineral resources corresponds to lands zoned MRZ-2. Although the County also includes approximately 225,112 acres of lands zoned MRZ-3 and MRZ-3a (over half of the plan area) that have not been fully evaluated and could contain valuable mineral resources, these areas are not afforded the same level of protection as MRZ-2 lands under the 2040 General Plan. However, because MRZ-3 and MRZ-3a areas have not been established as areas of value to the region or the State, it would be speculative to assess the potential effects of future development in these areas. Further, Policy COS-6.5 would require future discretionary development to conduct an evaluation to ascertain the significance of the mineral resource deposits located in the area of a proposed discretionary development based on the most current MRZ maps available at the time development is proposed (as updated pursuant to Policy COS-6.2). For these reasons, future development would not be anticipated to result in the loss of a known mineral resource that would be of value to the region and the residents of the State. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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

Under the County's current zoning ordinances, new oil and gas development must be authorized by a discretionary conditional use permit. Likewise, any material change to most existing modern-era (i.e., approximately post-1966) oil and gas permits requires County discretionary approval in the form of a permit modification. Future development that could be accommodated under the 2040 General Plan is described in Impact 4.12-1. There are several locations where the 2040 General Plan Land Use Diagram would allow for development in areas with existing oil wells or new oil well development that are identified as petroleum fields on Figure 8-10 of the Background Report. These include communities along Highway 150 between Ojai and Santa Paula, areas north of Camarillo and Oxnard and south of Highway 118, as well as in the unincorporated area of Simi Valley, that are designated for Very Low Density Residential. At the southern boundary of the county, west of Thousand Oaks, there are oil wells proximate to areas with Low-Density and Residential Planned Development designations. Similarly, there are wells in an unincorporated area of Thousand Oaks that is designated Low-Density Residential. Southwest of Santa Paula along Highway 126, north of the city of Ventura along Highway 33, and adjacent to Highway 101 along the coast, industrial designations would overlap with mapped oil fields. Residential designations would also coincide with existing wells along Highway 33 south of Highway 150.

The 2040 General Plan includes several policies intended to limit the potential for conflict between petroleum resource extraction uses (existing and proposed) and adjacent land uses. Although not all of these would potentially preclude petroleum development, they are described in this section to provide a comprehensive view of protections for petroleum production.

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. Additionally, NCZO Section 8107-5, Oil and Gas Exploration and Production and CZO Section 8175-5.7.8 Oil Development and Operational Standards, contain standards for siting of oil and gas development which include the requirement that drill sites and access roads shall not obstruct natural drainage courses (NCZO 8107-5.6.2 and CZO 8175-5.7.8(b)); and require that drill sites and roads or hauling routes located between the public right-of-way and the drill sites be maintained to prevent the emanation of dust, minimize erosion, prevent deterioration of vegetation and crops, and ensure adequate levels of safety (NCZO 8107-5.6.6 and CZO 8175-5.7.8(f)). Policy COS-7.2 would require that new oil wells subject to discretionary approval be located a minimum of 1,500 feet from residential dwellings and 2,500 feet from any school. Currently, the County's zoning standards state that wells should be located a minimum of 800 feet from sensitive uses (NCZO 8107-5.5.8 and CZO 8175-5.7.8), and must be located a minimum of 500 feet from dwelling units (NCZO 8107-5.6 and CZO 8175-5.7.8), 500 feet from schools in the non-coastal area (NCZO 8107-5.6), and 800 feet from schools in the Coastal Zone (CZO 8175-5.7.8), unless these setback requirements are waived by occupants of the sensitive uses.

Policies COS-7.2 and COS-7.3 are proposed 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 release of chemicals into the air from oil and gas activities can occur from surface operations, wells and pipelines, operation of diesel or gas-powered equipment and vehicles, and accidental releases. As discussed further below, health indicators such as adverse birth outcomes; cancer; and respiratory, neurological, gastrointestinal, dermatological, and psychological effects, have been associated with proximity to oil and gas extraction sites (County of Los Angeles 2018).

Oil and gas extraction sites may expose individuals to airborne emissions of nitrogen oxides, particulate matter, and volatile organic compounds (VOCs), such as benzene. Studies have shown that long-term exposure to elevated levels of benzene may increase the risk of developing cancer, particularly acute myelogenous leukemia. Particulate matter and VOCs can also lead to eye, nose, and throat irritation; exacerbations of asthma; and other respiratory conditions. VOCs have also been associated with adverse reproductive and developmental effects, as well as neurological effects such as headaches, dizziness, and other impacts to the central nervous system. In addition, the myriad chemicals associated with drilling fluids present public health concerns ranging from respiratory health effects to cancer, if not properly monitored and controlled. Hydrogen sulfide, which produces a smell similar to rotten eggs, occurs naturally in crude petroleum and natural gas and is also a by-product of desulfurization processes in oil and gas industries that may present a nuisance to nearby sensitive receptors. The ability to detect odors varies considerably among individuals, and the reaction can even sometimes be susceptible to odor fatigue (i.e., the phenomenon in which a person can become desensitized to odor). The physical manifestations of an individual's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache).

There are also a number of activities associated with oil and gas exploration and production that can elevate exterior noise levels, including well advancing and well pump operation. Noise generated by oil and gas extraction sites has been linked to sleep disturbance and may contribute to increased risk of depression, anxiety, and fatigue (County of Los Angeles 2018).

For additional discussion of the adverse health outcomes associated with exposure to toxic air contaminants and stationary noise sources, refer to Section 4.3, “Air Quality,” and Section 4.13, “Noise and Vibration,” respectively.

The benefits of siting oil and gas sites away from residences and sensitive receptors to reduce public health impacts has been identified in various studies. The California Council on Science and Technology (CCST) concluded that “[m]any of the constituents used in and emitted by oil and gas development can damage health and place disproportionate risks on sensitive populations” (CCST 2015:13). The study also found that “[t]he closer citizens are to these industrial facilities, the higher their potential exposure to toxic air emissions and higher risk of associated health effects.” For this reason, “the scientific literature supports the recommendations for setbacks” and the “need for setbacks applies to all oil and gas wells” (CCST 2015:431). Specifically, the CCST study states that, “Studies from outside of California indicate that community public health risks of exposures to toxic air contaminants (such as benzene and aliphatic hydrocarbons) are most significant within 0.5-mile (800 meters or 2,625 feet) from active oil and gas development. These risks will depend on local conditions and the types of gas and petroleum being produced. Actual exposures and subsequent health impacts in the Los Angeles Basin may be similar or different, but they have not been measured” (CCST 2015:213). Furthermore, a public health study completed in the State of Maryland recommended a 2,000-foot setback from well pads (University of Maryland 2014:91).

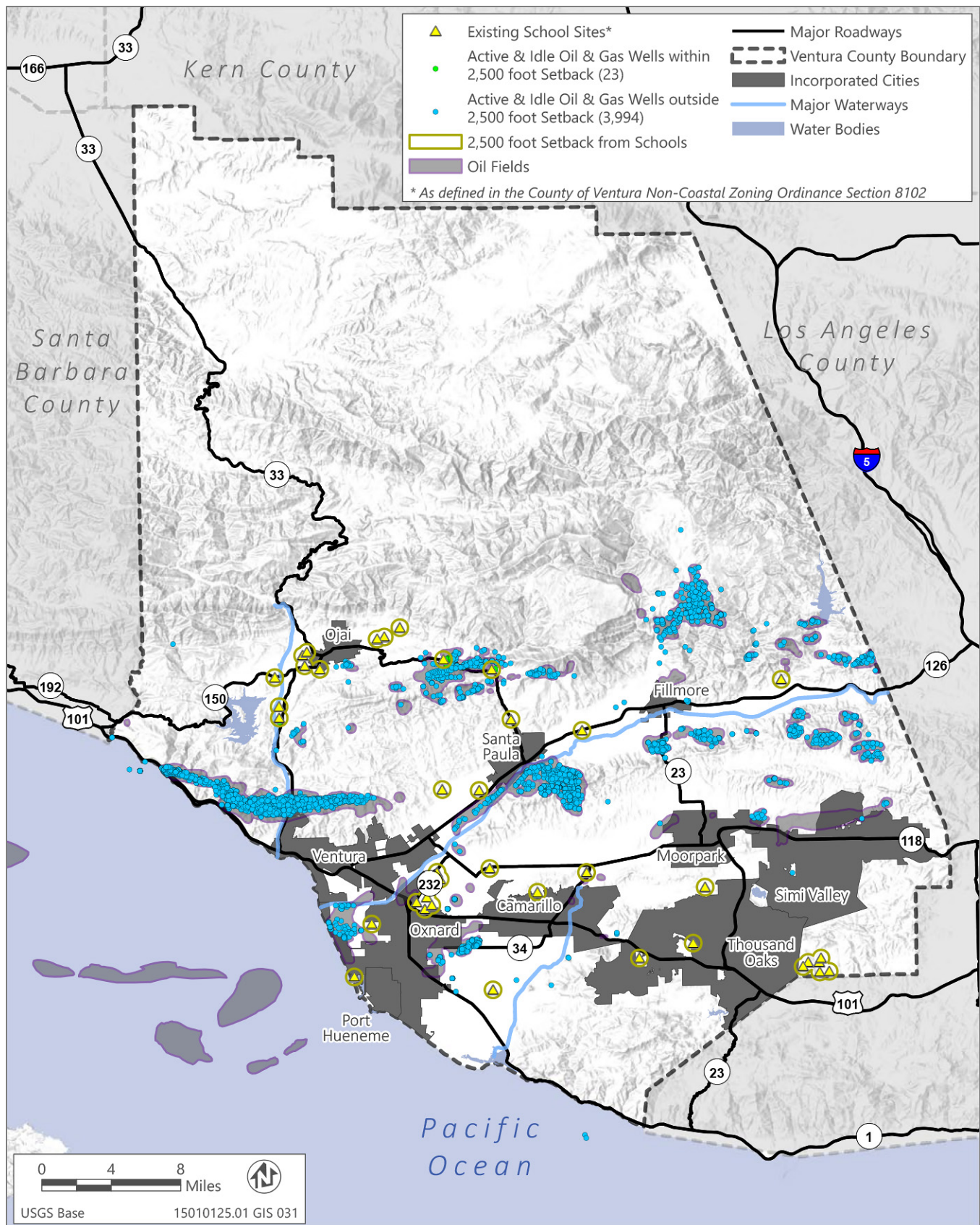
An evaluation of public health risks associated with oil and gas facilities, the Los Angeles County Department of Public Health (LACDPH) concluded that a setback distance of 1,500 feet would address the human health effects of air quality, noise, and odor associated with well operation such that additional mitigation would not be needed (County of Los Angeles 2018: Table 2). In February 2019, California Assembly Bill 345 (AB 345) was introduced to require, subject to specified variances, all new oil and gas-development or enhancement operations to be located at least 2,500 feet from a residence, school, childcare facility, playground, hospital, or health clinic. A variance request to reduce the 2,500-foot distance can be filed by an oil or gas well operator with the DOGGR State Oil and Gas Supervisor. Such a request may be approved if the operator can demonstrate that there is no other feasible means of accessing a legal subsurface right and provided that the variance provides as much distance to sensitive receptors as achievable and it would not endanger public health and safety. This purpose of this proposed bill is to establish “...a safe distance between drilling operations and vulnerable populations in order to avoid serious public health and safety risks and impacts” (California State Assembly 2019). The bill was removed from the docket for the 2019 legislative session but will be eligible for consideration again in 2020. The above discussion presents the potential benefits of the proposed setback policies designed to protect sensitive receptors from adverse health and safety outcomes related to nearby oil and gas development. Section 4.3, “Air Quality,” of this draft EIR evaluates air quality impacts on sensitive receptors. While these policies may serve to protect public health and safety, they also have the potential to hamper or preclude access to petroleum resources and which is the subject of this impact analysis.

Some policies of the 2040 General Plan do have the potential to preclude petroleum development, as follows. Through the 2040 General Plan, land use designations would be refined to reflect the existing zoning. There would be 13 land use designations established that more precisely distinguish among allowed land uses and set forth maximum development density and intensity standards. Properties that are currently zoned for petroleum extraction as a conditionally permitted land use would continue to be designated for this use as well as other land uses.

Likewise, properties where petroleum resources have been mapped (see Figure 8-10 of the Background Report) but existing conditions, such as existing development on the property, or existing zoning regulations, do not support or allow for the extraction of these resources, would continue to not support or allow for resource extraction under the 2040 General Plan. However, the increased setback requirements for new wells subject to discretionary permitting established in Policy COS-7.2 could hamper future petroleum extraction by prohibiting new discretionary wells within 1,500 feet of dwelling units and 2,500 feet of schools.

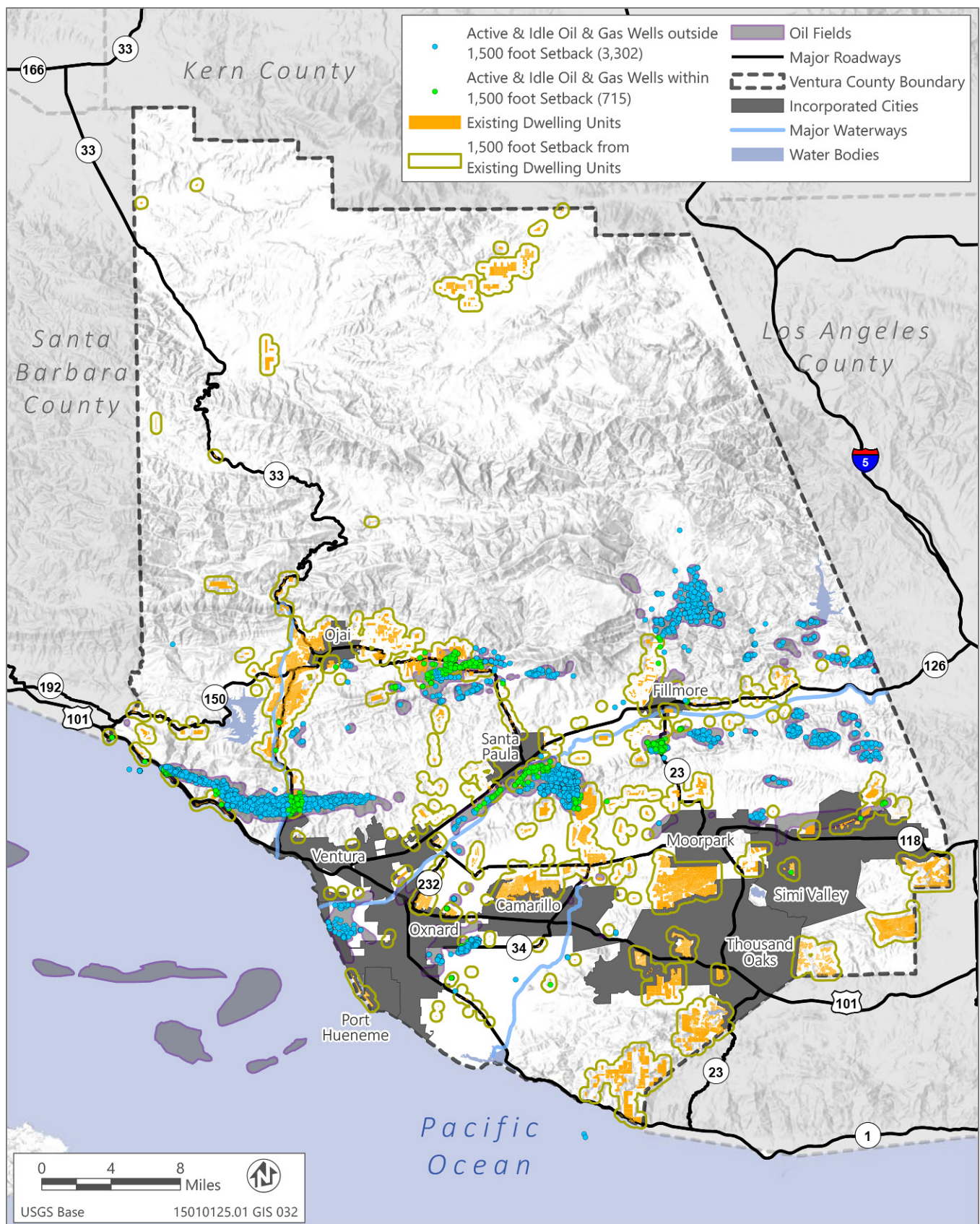
As described above, the 2040 General Plan aims to guide growth, including residential development and schools, to areas in the Existing Community area designation (boundary) and Urban area designation (boundary) where oil and gas extraction may currently be precluded by existing established land uses. Nonetheless, 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 oil and gas extraction subject to discretionary approval may be proposed during the planning horizon of the 2040 General Plan. As shown in Figures 4.12-1 and 4.12-2, there are currently 23 active and idle oil wells within 2,500 feet of existing schools and 715 active and idle oil wells within 1,500 feet of existing dwelling units in the unincorporated county.

The County's zoning ordinances include eleven zone classifications which allow for oil and gas exploration and production as a conditionally permitted land use that is potentially compatible with dwelling units and schools. A Conditional Use Permit (CUP) is required for the development of oil and gas exploration and production as a permitted use. A CUP is based upon a discretionary decision required prior to initiation of particular uses not allowed as a matter of right and may be denied on the grounds of unsuitable location or may be conditioned in order to be approved. The minimum parcel sizes, ranging from one to forty acres, for the Open Space/Coastal Open Space, Agricultural/Coastal Agricultural and Rural Agriculture zone classifications would likely not hamper or preclude access to petroleum reserves in the vicinity of these uses. This assumption is based on the larger minimum lot sizes, lot coverage restrictions, fire code issues such as lack of secondary access in remote or geologically restrictive areas, and more limited access to water, utilities and infrastructure, any or all which can effectively prohibit or increase the cost of future development for new dwelling units or schools, thereby reducing potential development of these sensitive uses in these zone classifications. Additionally, the larger minimal parcel sizes provide more flexibility in the siting of new oil and gas wells, required to comply with the setback distances prescribed in Policy COS-7.2. Conversely, future oil and gas extraction within compatible zone classifications with minimum parcel sizes of 10,000 and 20,000 square feet may be hampered or access to petroleum reserves precluded as these zones have smaller minimum lot sizes which provide less flexibility in the siting of allowed uses and allow for greater maximum lot coverage which may inhibit compliance with the setback distances prescribed in Policy COS-7.2. Figure 4.12-3 depicts the oil fields within Ventura County, active and idle oil and gas wells, and the zone classifications which potentially allow oil and gas exploration and production as a conditionally permitted use, and also allow dwelling units and schools.



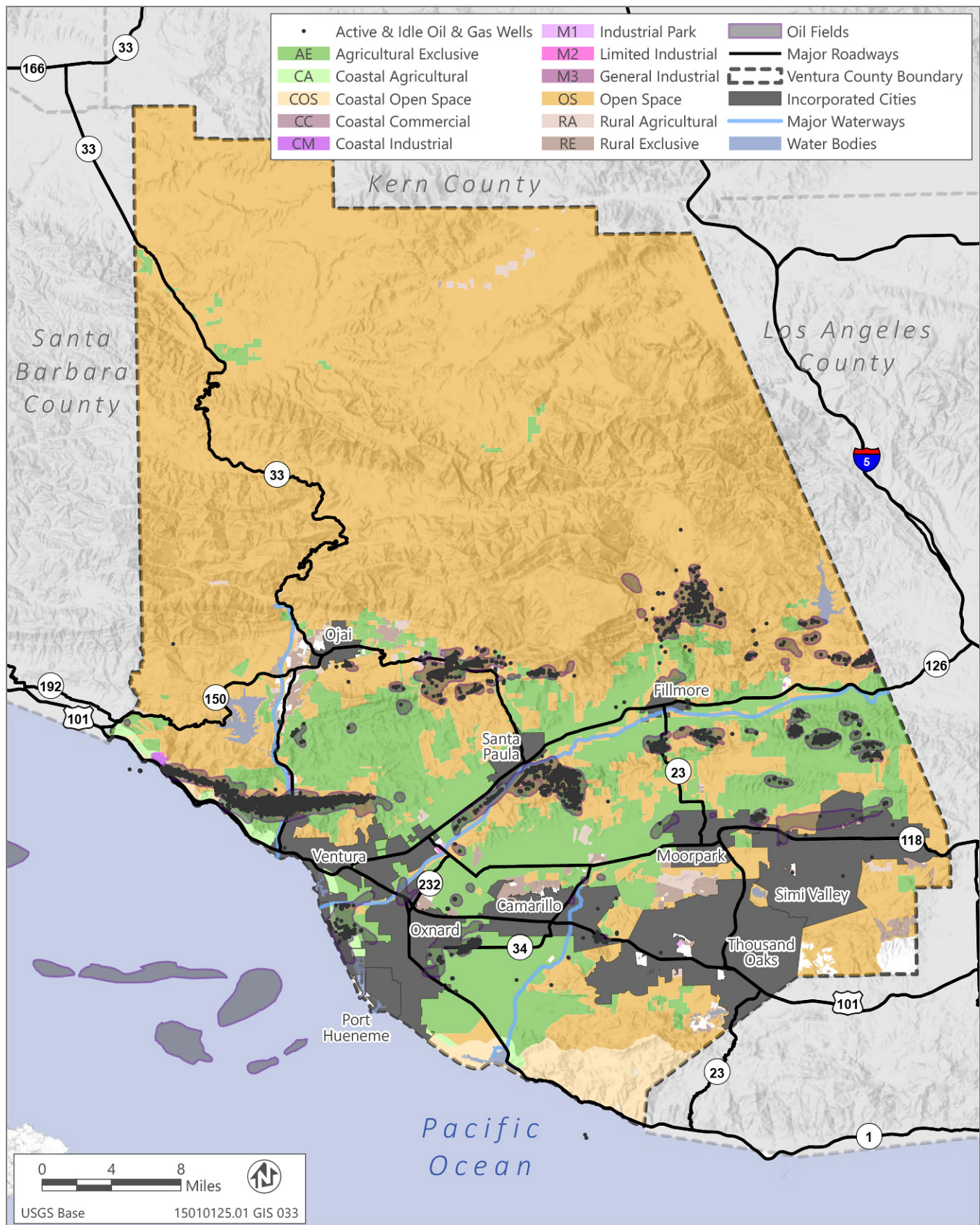
Source: Ventura County, 2016; CAL FIRE 2007 (State), 2008 (Local), and 2016 (Federal); USGS, 2013; DOGGR, 2019

Figure 4.12-1 Oil and Gas Well 2,500-ft Setback from Schools Map



Source: Ventura County, 2016; CAL FIRE 2007 (State), 2008 (Local), and 2016 (Federal); USGS, 2013; DOGGR, 2019

Figure 4.12-2 Oil and Gas Well 1,500-ft Setback from Dwelling Units Map



Source: Ventura County, 2016; CAL FIRE 2007 (State), 2008 (Local), and 2016 (Federal); USGS, 2013; DOGGR, 2019

Figure 4.12-3 Non-Coastal Zoning Ordinance & Coastal Zoning Ordinance Zone Classifications which allow Oil & Gas Exploration and Production & Dwelling Units

Future development of dwelling units and schools within compatible zone classifications with minimum parcel sizes of 10,000 and 20,000 square feet could affect the ability to develop new oil wells on neighboring parcels of approximately 0.25 to nearly 0.5 mile from these uses/structures. 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.

Policy COS-7.2 would notably increase the existing setback requirements for new oil and gas wells such that 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 resource. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure PR-1: Revised Policy COS-7.2: Oil Well Distance Criteria

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

COS-7.2: Oil Well Distance Criteria

The County shall require that new discretionary oil and gas wells ~~to be located~~ be sited a minimum of 1,500 feet from ~~the well head to residential dwellings dwelling units and 2,500 from any school~~ sensitive use structures which include dwellings, childcare facilities, hospitals, health clinics, and school property lines.

Significance after Mitigation

Mitigation Measure PR-1 would revise Policy COS-7.2 to include a broader range of sensitive uses than currently included in the County zoning ordinances' petroleum setback requirements for occupied sensitive uses which include dwellings, schools, and health care facilities. NCZO (Section 8102-0) and CZO (Section) 8172-1 define a dwelling as a building or portion thereof designed or occupied exclusively for residential purposes. NCZO (Section 8102-0) defines a schools as educational facilities for pre-college levels of instruction; specifically limited to elementary, middle school and high schools offering full curricula as required by State law. The CZO does not include a definition for schools. California Health and Safety Code Section 42705.5(5) defines sensitive receptors as hospitals, schools and day care centers, and such other locations as the district (Air Pollution Control District) or State board (California Air Resources Board) may determine. The revised policy includes childcare facilities (i.e. day care centers) and hospitals consistent with HSC Section 42705.5(5). Additionally, health clinics are included consistent with proposed AB 345 setback distance from oil and gas development or enhancement operations. With the proposed expansion of the types of uses considered "sensitive uses," the lesser of the minimum setbacks for Policy COS-7.2 (1,500 feet) is proposed to apply to all types of sensitive uses as part of Mitigation Measure PR-1. The minimum setback distance of 1,500 feet for future oil and gas wells is consistent with the recommended setback distance for sensitive populations described in the Los Angeles County LACDPH, *Public Health and Safety Risks of Oil and Gas Facilities in Los Angeles County* report (February 2018). This report includes a review of key public health and safety hazards and guidance for setback distance criteria that may reduce the health and safety risks associated with existing and new oil and gas operations in proximity to sensitive populations. The report also synthesizes information from multiple sources, including a review of epidemiological literature, environmental and health impact assessments, neighborhood health investigations, and consultations with various jurisdictions regarding oil and gas ordinances.

The report recommends that the County of Los Angeles, and local jurisdictions within that county, expand the current minimum setback distance beyond 300 feet and apply these requirements to both the siting of new wells and to the development of sensitive land uses near existing operations. The recommended setback distances were based on information compiled from scientific publications, environmental impact assessments, other environmental studies, and experiences in other jurisdictions. The report concludes that many of the environmental impact reports and health impact assessments reviewed for oil and gas development projects predicted significant impacts from air emissions, odors, noise, vibration and safety hazards; and provided site-specific mitigation measures to try to reduce or eliminate those impacts. In particular, effective mitigation measures were designed to substantially reduce or eliminate impacts from air emissions and noise. The report indicates that depending on operational and environmental conditions, odor impacts from routine operations and/or emergency events may not be possible to mitigate with currently available measures. Community Safety Plans and enhanced Emergency Response Plans are recommended to address the significant possible safety hazards associated with oil and gas activities and to prepare for leaks, seepage and other potential disasters. In addition to these preparedness plans and mitigation measures, the report recommends comprehensive and continuous environmental monitoring which will allow operators and regulatory agencies to develop evidence-based strategies to protect public health.

Based upon the potential toxic air emission, odors, noise, and safety hazard impacts related to oil and gas development noted above, the report recommends a range of setback distances including 600, 1,000, and 1,500 feet to address and mitigate for air quality, noise and odor impacts to sensitive populations. The report indicates that a 600-foot setback would reduce air quality impacts; however, air quality monitoring is advised. Furthermore, at this distance, additional mitigation and assessment would likely be needed to avoid noise, and safety hazards (e.g. fires, explosions and other emergencies) and odors may be unavoidable. This distance would not mitigate for safety hazards. A 1,000-foot setback would reduce air quality and noise impacts; however, additional mitigation and assessment may be needed to avoid certain noise impacts during some key operations, e.g. well advancement (drilling). Furthermore, odors may be unavoidable in loss of containment events, regardless of additional mitigation. This distance would not mitigate for safety hazards. A 1,500-foot setback would reduce air quality, noise and odor impacts. However, there remains some uncertainty as to whether additional mitigation may be needed due to gaps in long-term health and exposure data. This distance would not mitigate for safety hazards. The report further notes that a setback distance is not an absolute measure of health protection and additional mitigation measures must also be considered. For existing oil and gas operations, the report recommends a site-specific assessment at each facility throughout Los Angeles County to identify current distances to sensitive land uses and other site characteristics that can be used to inform whether further mitigation measures are warranted to reduce potential public health and safety risks.

In July 2019, the City of Los Angeles completed the *Oil and Gas Health Report* addressing the feasibility of establishing a setback distance of 1,500 feet from sensitive receptors on future oil and gas development. The report identifies oil and gas infrastructure within the City of Los Angeles, evaluates materials used at such sites, studies the peer reviewed scientific literature on human health and oil and gas development, and presents the findings based on report results.

The report concludes that if surface setback distance alone is established from sensitive receptors, it should be at least 600 feet due to the uncertainty of airborne chemicals of concern, or at least 500 feet which was the minimum threshold evaluated in the multiple epidemiological literature studies evaluated in the report. A surface setback distance of 600 feet would meet the minimum LACDPH report. However, in addition to a 600-foot surface setback, the City of Los Angeles report recommends best available emission control technologies and operational management approaches should be deployed on all oil and gas wells and ancillary infrastructure to limit emissions of toxic air pollutants. Furthermore, the report noted enhanced operating conditions, required engineering controls, annual inspections, and utilization of the best available technology can significantly reduce the need for potential setback distances.

Both reports noted above recommend surface setback distances of a minimum of 600 feet or, as specified by the LACDPH report, 1,500 feet from sensitive receptors, as a means to mitigate toxic air emission, odor, and noise impacts. The proposed setback distance of 2,500 feet identified in AB 345 relies on the CCST study as recommending “a health and safety buffer zone between sensitive land uses and oil and gas wells in order to protect communities where neighborhood drilling occurs” (California State Assembly 2019). However, the CCST study does not include a recommendation of 2,500 feet from the sensitive receptors included AB 345. Rather the study provides an overarching recommendation to “conduct studies in the Los Angeles Basin and throughout California to document public health risks and impacts as a function of proximity to all oil and gas development—not just those that are stimulated—and promptly develop policies that decrease potential exposures. Such policies might incorporate, for example, increased air pollutant emission control technologies, as well as science-based minimum surface setbacks between oil and gas development and places where people live, work, play and learn” (CCST 2015:259).

Based on review of literature for this impact analysis and to be more protective of a broader definition of sensitive uses and reduce air quality, noise and odor impacts from well operations, Mitigation Measure PR-1 would expand the types of sensitive uses that would be required to have minimum setback distances from oil and gas wells. A minimum of a 1,500-foot setback has been proposed to create greater protections for a larger number of sensitive land uses in the county and this buffer distance is greater than the current buffer distance of 600-feet for residential dwellings established by the current general plan. However, the change in Mitigation Measure PR-1 would reduce the setback required for schools from 2,500 feet to 1,500 feet. While oil and gas wells could now operate at a closer distance to schools relative to Policy COS-7.2, data suggests that the 1,500-foot setback requirement would be sufficient to minimize air, noise, and odor impacts from well operations. Further, a greater number of land uses would be subject to this 1,500-foot requirement and would result in greater public health protections for sensitive populations consistent with recommendations from available data and science. Further, this policy change would reduce the magnitude of access impacts for petroleum operators compared to the 2040 General Plan because the buffer for schools would be reduced significantly thereby opening up potential land area that could support well operations. By doing this, this mitigation would satisfy the requirements of CEQA to “reduce” the significant effects of the project. However, it should be acknowledged that this policy change could also result in other areas of the county that would be subject to setback requirements because of the expanded sensitive land uses that would be protected, though it is too speculative to determine this at this time.

While the amended policy would put limitations on the placement of new discretionary oil and gas wells, it would not necessarily prohibit access to the oil and natural gas resources being sought. In resource locations near sensitive land uses, directional drilling (including horizontal drilling) techniques could be utilized. Modern directional drilling utilizes drill bits that can bend at a multitude of angles, allowing operators to access underground resources without having to locate a drill site directly above a subsurface reservoir that might otherwise be located in the setback distance. According to the International Association of Drilling Contractors, this drilling method has been utilized by the oil and gas industry since the 1920s, and is currently used in oil fields worldwide (IADC 2015). This method is also used by various oil operators throughout the county.

Mitigation Measure PR-1 would implement permitting challenges that may affect the feasibility of local oil and gas production and, in turn, would increase the reliance on foreign imports from outside of the 2040 General Plan area. Overall crude demand has held steady in California for the past 20 years, but the percent of domestic (California) production has declined. Foreign and Alaskan crude oil imports have offset the decline of California production over the last two decades (City of Los Angeles 2019 EIA 2019). Because California does not have any interstate pipelines that supply crude oil to the State from other states, it is isolated from the larger national petroleum network and therefore must rely on foreign and Alaskan sources of oil that are transported by marine tankers. Any reduction in supply from Ventura or elsewhere in California cannot be offset by increasing imports from another state.

As discussed in the City of Los Angeles report (2019), in 2018, the energy demand for California required approximately 642,000 barrels of crude oil per day from refineries across the State. The State imports nearly 60 percent of the crude oil used at refineries in San Francisco Bay and Los Angeles/Long Beach Port Complex. As of 2016, Ventura County crude oil production accounted for four percent of overall crude oil production onshore within the State of California and 0.1 percent of offshore production (see Appendix B). The report noted that in 2018, the California Energy Commission (CEC) reported that California refineries received 31 percent of their crude oil from domestic California production, 11 percent from domestic Alaska production, and 58 percent from foreign countries. The CEC and U.S. Energy Information Administration report that foreign sources of crude oil imported to California totaled 364 million barrels in 2018, mainly coming from North America, Latin America, Africa, and the Middle East, Saudi Arabia, Ecuador and Columbia.

To the extent the amended policy would contribute to a reduction of new oil and gas production in the unincorporated county, and to the extent the new oil and gas that would have been produced in the unincorporated area would also have been consumed in California, the demand for California-produced oil and gas would be satisfied through the importation of additional oil and gas from other countries and Alaska, which in turn could have indirect environmental impacts such as those associated with transporting the oil and gas from outside of Ventura County. Such impacts, however, would largely occur outside the 2040 General Plan project area.

Including additional sensitive uses such as childcare facilities, hospitals, and health clinics in Mitigation Measure PR-1 would increase the policy's potential impact on the ability of oil operators to access petroleum resources near these additional uses. Mitigation Measure PR-1 would hamper or preclude access to petroleum resources for new discretionary oil and gas wells that cannot comply with the setback criteria set forth in this policy for occupied sensitive uses that exist at the time of a proposed new discretionary well.

Based on the conclusions presented in the LACPHD report discussed above, any revisions to COS-7.2 that would reduce the minimum 1,500-foot setback requirements for new oil and gas wells from sensitive receptors could reduce the beneficial impact of this setback related to toxic air emissions, odor, noise and safety hazards on these uses. The literature reviewed for this analysis did not recommend a 2,500-foot setback specifically from schools for new oil and gas wells. Rather, schools are considered within the class of sensitive receptors and included in the recommended 1,500-foot setback distance from new oil and gas wells and production (County of Los Angeles 2018). Therefore, a reduction from 2,500 feet to 1,500 feet for schools from new oil and gas wells would not likely increase the potential impacts from toxic air emissions, odor, noise and safety hazards on schools.

As discussed above, Figure 4.12-3 depicts the oil fields within Ventura County, active and idle oil and gas wells, and the eleven zone classifications which allow for oil and gas exploration and production as a conditionally permitted land use that is potentially compatible with dwelling units and schools. Future oil and gas extraction within compatible zone classifications with minimum parcel sizes of 10,000 and 20,000 square feet may be hampered or access to petroleum reserves precluded as these zones have smaller minimum lot sizes which provide less flexibility in the siting of allowed uses and allow for greater maximum lot coverage which may inhibit compliance with the setback distances prescribed in Policy COS-7.2. Furthermore, as shown in Figures 4.12-1 and 4.12-2, there are currently 23 active and idle oil wells within 2,500 feet of existing schools and 715 active and idle oil wells within 1,500 feet of existing dwellings in the unincorporated county. Future discretionary expansion of oil production within the setback distances depicted on Figures 4.12-1 and 4.12-2 would be prohibited pursuant to Policy COS-7.2. Policy COS-7.2 could theoretically affect local oil and gas exports and increase the reliance on imports from outside of the 2040 General Plan area. There are no actions or policies that the County could feasibly mandate to fully reduce the impact that Policy COS 7.2 would have on hampering or precluding access to petroleum resources. This impact would remain **significant and unavoidable**.

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

Under the County's current zoning ordinances, new oil and gas development must be authorized by a discretionary conditional use permit. Likewise, any material change to most existing modern-era (i.e., approximately post-1966) oil and gas permits requires County discretionary approval in the form of a permit modification. The County is considering amending its zoning ordinances to similarly require a discretionary permit modification to authorize new oil and gas development under "antiquated" use permits that lack expiration dates, well limits, and other development parameters (i.e., approximately pre-1966).

There are two policies proposed in the 2040 General Plan that would result in new requirements that would apply to new projects subject to discretionary action by the County that could limit petroleum extraction without placing a physical limitation on location or access: Policy COS-7.7 would require oil wells to use pipelines to convey oil and produced water offsite (rather than trucking) and Policy COS-7.8 would require that gases emitted from all new discretionary oil and gas wells be collected and used or removed for sale or proper disposal (rather than flaring) except for cases of emergency or for testing purposes. Both policies provide potential environmental benefits in the form of increased traffic safety, fewer toxic air contaminants and reduced greenhouse gas emissions (from avoided flaring and trucking). Combined, these policies support attainment of the following 2040 General Plan Guiding Principles:

- ▶ **Hazards and Safety:** Minimize health and safety impacts to residents, businesses and visitors from human-caused hazards such as hazardous materials, noise, air, sea level rise, and water pollution, as well as managing lands to reduce the impacts of natural hazards such as flooding, wildland fires, and geologic events.
- ▶ **Climate Change and Resilience:** Reduce greenhouse gas emissions to achieve all adopted targets, proactively anticipate and mitigate the impacts of climate change, promote employment opportunities in renewable energy and reducing greenhouse gases, and increase resilience to the effects of climate change.
- ▶ **Environmental Justice:** Commit to the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies, protect disadvantaged communities from a disproportionate burden posed by toxic exposure and risk, and continue to promote civil engagement in the public decision-making process.

Conversely, these policies reduce attainment of the following 2040 General Plan Guiding Principle:

- ▶ **Economic Vitality:** Foster economic and job growth that is responsive to the evolving needs and opportunities of the County's economy and preserves land use compatibility with Naval Base Ventura County and the Port of Hueneme, while enhancing quality of life and promoting environmental sustainability.

As discussed further below, the use of pipelines for the conveyance of crude oil and gas is currently required under the County's zoning ordinances, where feasible. The NCZO (Section 8107-5.5.5(a)) and CZO (Section 8175-5.7.7(e)) establish that pipelines should be used to transport petroleum products offsite to promote traffic safety and air quality, except when infeasible or impractical. There are a variety of logistical challenges associated with piping crude oil. Existing oil pipelines in the county are privately owned and pipeline owners and operators are required to comply with a variety of regulations, including periodic safety testing. As discussed in the Regulatory Setting above, safety testing of oil and gas pipelines is required to comply with federal, State, or local regulations (i.e., Pipeline and Hazardous Material Safety Agency and State Fire Marshall safety testing of pipelines; DOGGR safety testing of oil and gas wells, and the CPUC safety testing of facilities used in the gathering, transmission and distribution of gas). This safety testing may require the removal and transport via truck of oil, gas or produced water in order to execute the requisite testing protocols. To transport produced oil via pipeline, the oil operator must first identify potential interconnection options for the subject production facility. Once identified, the interconnection is subject to agreement between the oil operator and pipeline owner, including the fees which must be paid to the pipeline owner.

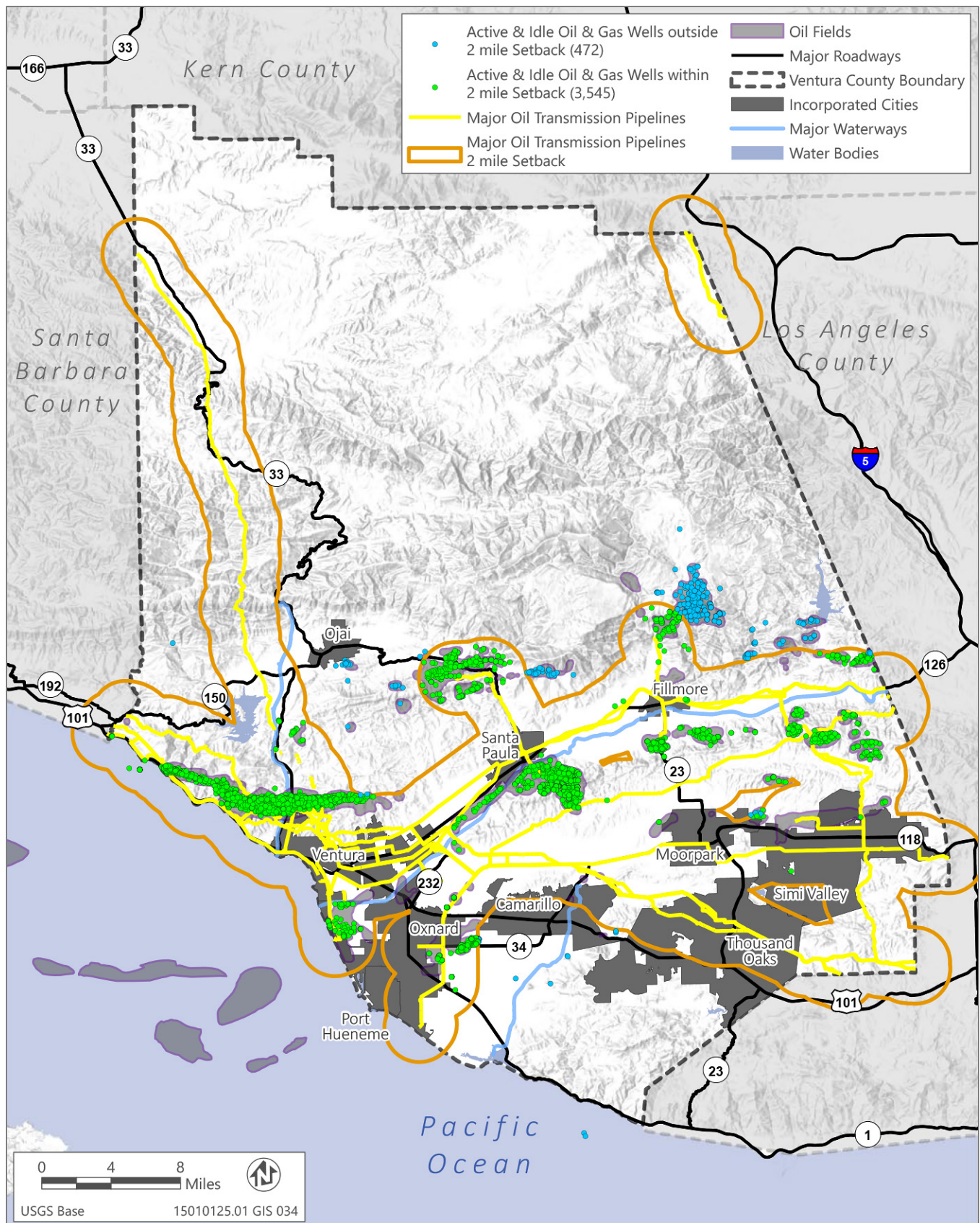
The Renaissance Petroleum LLC., *Cabrillo Oil Field Options and Economic Feasibility Study* (Traut 2016), completed for the Ventura County Planning Division as part of a requested oil and gas development permit modification, evaluated the economic feasibility of constructing a pipeline to transport crude oil from the Cabrillo Oil Field Naumann Drillsite to market by way of a pipeline instead of tanker truck. The study noted that an estimated tariff to transport crude oil via pipeline is \$0.50 per barrel. The estimated net savings realized by utilizing a pipeline for crude oil transport instead of truck transport is \$2.00 per barrel. It was concluded that constructing pipelines to transport produced oil at a distance of approximately 6 to 10 miles

would not be economically feasible or justifiable. Specifically, it was estimated that the three available pipeline interconnection points for a proposed drilling site would require the construction of between 6.6 and 10.6 miles of new pipeline at 1.2 to 1.5 million dollars per mile and a total cost of 11.4 million dollars for permitting design, engineering, and construction. The necessary lead time for these actions would be 4 to 5 years (Traut 2016). The study indicated that the economic feasibility of any pipeline project would be based on the differential savings between the cost of transporting oil by pipeline versus the cost of transporting oil by tanker truck, after consideration of the capital investment of pipeline construction. A series of discounted cash flow analysis were performed to determine the net present value (NPV) of the pipeline project based on the Renaissance Petroleum's 2016 annual production of approximately 1,800 barrels of oil per month forecasted out for 25 years. For a pipeline project to be considered economically feasible, the NPV would have to be no less than \$0, which equates to a 5 percent rate of return on the original capital investment. The study concluded that the initial annual production rate for Renaissance Petroleum required to drive the NPV to \$0 was 1,305,808 barrels of oil, a volume more than 16 times the annual production peak of 80,221 realized in the Cabrillo Oil Field in 2011. Although the per barrel cost of piping oil noted in the study may be less than trucking, an oil operator would need a large volume of oil production to realize the economic feasibility of installing oil pipelines as a replacement for conveying crude oil by tanker truck. For many smaller volume oil operators in the county, the payback period for construction a crude oil pipeline could render the investment in pipeline construction infeasible.

Once connected to a major oil transmission pipeline, transporting oil through these pipelines requires compliance with the pipeline carrier's thresholds and not to exceed standards for acceptable API gravity. API gravity is a measure of how heavy or light a petroleum liquid is compared to water. For example, if API gravity is greater than 10, it is lighter and floats on water; if less than 10, it is heavier and sinks. API gravity is thus an inverse measure of a petroleum liquid's density relative to that of water (also known as specific gravity) and is used to compare densities of petroleum liquids. The major oil transmission pipelines depicted in Figure 4.12-4 maintain rules and regulations governing the gathering and transportation of crude oil in the county. For example, the Crimson California Pipeline, L.P. (CCP), which serves as a major oil transmission pipeline for conveyance of oil for processing out of the county, has established rules and regulations regarding acceptable API gravity thresholds required to convey oil (CCP 2016). These thresholds stipulate that CCP reserves the right to reject any and all shipments of oil whose API gravity are such that it is not readily susceptible to transportation through their pipeline. Consequently, assuming an oil producer has the ability to connect to a major oil transmission pipeline, they must ensure that the oil from their operations meets the pipeline carrier's thresholds and not to exceed standards for acceptable API gravity. Meeting these thresholds and standards may require oil operators install additional on-site production facilities to process crude oil in order to meet API gravity thresholds, which may not be technologically or economically feasible to install in order to connect to a major oil transmission pipeline.

Conveyance of Crude Oil

Figure 4.12-4 depicts the major oil transmission pipelines and location of active and idle oil wells located in the unincorporated county. This map illustrates that most oil wells in the county are clustered within approximately 2 miles of major oil transmission pipelines, which transport oil from local operators out of the county for processing. For purposes of the following analysis and based on the estimated per mile cost to install pipelines, it is assumed that any



Source: Ventura County, 2016; CAL FIRE 2007 (State), 2008 (Local), and 2016 (Federal); USGS, 2013; DOGGR, 2019

Figure 4.12-4 Major Oil Transmission Pipelines Map

existing oil wells located within a 2-mile radius of a major oil or gas transmission pipeline are connected to these transmission lines through smaller gathering or minor pipelines. Furthermore, it is assumed these oil operators have the operational ability to meet the API gravity thresholds and standards required to convey their oil through a major oil transmission pipeline. It is also assumed that any oil wells located beyond a 2-mile radius of a major transmission pipeline are not connected to these lines. Additionally, it is assumed that these oil operators would not have the operational ability to meet the API gravity thresholds and standards required to convey their oil through a major oil transmission pipeline. Therefore, it is assumed that most operators located beyond the two-mile radius of a major transmission pipeline would not be able to comply with the pipeline requirements of Policy COS-7.7 due to the technological and economic infeasibility of installing lengthier pipelines greater than two miles from new oil wells to a major oil transmission line or due to the additional on-site production facilities to process crude oil in order to comply with API gravity thresholds and standards in order to convey oil through a major oil transmission pipeline.

Figure 4.12-4 depicts 472 active and idle oil wells located outside of the 2-mile radius of a major oil transmission line. The oil operators located beyond the two-mile radius, and in more remote locations, likely consist of smaller oil producing operations that are not extracting a large amount of oil. Additionally, Figure 4.12-4, depicts 3,545 current active and idle oil wells located within the two-mile of a major oil transmission pipeline. The larger clustering of these operations is likely a function of greater opportunities for oil extraction and technological or economically feasible access to a major oil transmission line. However, those oil operators within the two-mile radius of a major oil transmission pipeline may be effectively prohibited by Policy COS-7.7 if connection to existing smaller gathering or minor pipelines, which can connect to a major oil transmission pipeline, or additional on-site production facilities to process crude oil in order to comply with API gravity thresholds and standards in order to convey oil through a major oil transmission pipeline, are not technologically or economically feasible.

Conveyance of Produced Water

Oil operators would be required to comply with Policy COS-7.7 for new discretionary oil wells that require the transport of produced water, which pursuant to the policy, must be conveyed via pipeline. According to DOGGR, approximately 15 times more water than oil is produced from California's oil and gas fields. Crude oil is a heterogeneous mixture of solids, liquids, and gases. This mixture includes sediments, water and water vapor, salts, and acid gases, including carbon dioxide and, sometimes, hydrogen sulfide. Water that is part of the fluid produced from the well is called "produced water" and contains many of the same components found in crude oil. Conveyance of produced water via pipeline from an oil operation requires connection to a receiving location (e.g. oilfield waste management company) for processing and disposal. Currently, there are no major produced water transmission pipelines in the county. Produced water may also be used on-site through such technologies as steam generated electricity. Finally, produced water may be disposed of through Class II injection wells permitted by DOGGR. These wells are used for waterflood, steam flood, cyclic steam, and to dispose of the salt and fresh water produced in the process of extracting oil and gas. Use of a Class II injection well for water disposal requires review and approval by DOGGR that the geology of the area and the injection zone is appropriate for the disposal of produced water. Based upon Policy COS-7.7, oil operators would be required to convey produced water separated from oil and gas at the oil and gas extraction (well) to the Class II injection well underground injection site. From there, the water is transferred to holding tanks and filtered

and pumped down a Class II injection well. The injection zone where this produced water may be injected is usually composed of sandstone, a rock porous and permeable enough to accept injected fluids. Rock beds chosen for injection zones are covered by impermeable beds, like shale, that act as cap rocks, confining injected liquids in the porous beds.

Oil operators may not be able to comply with requirements of Policy COS-7.7 to convey produced water via pipeline due to the technological and economic infeasibility of installing Class II injection well(s) and associated infrastructure needed to convey produced water from an oil and gas well site(s) to the of the injection zone. Similarly, oil operators may not be able to comply with requirements of Policy COS-7.7 due to the technological and economic infeasibility of installing a produced water pipeline from the oil and gas well site(s) to a receiving location (e.g. oilfield waste management company) for processing and disposal.

Therefore, it is assumed that oil facilities located beyond the two-mile radius of a major transmission pipeline, would not be able to comply with the pipeline requirements of Policy COS-7.7 due to the technological and economic infeasibility of installing new Class II injection wells to inject produced water underground or convey produced water to a major transmission pipeline.

Flaring of Produced Gas

The NCZO (Section 8107-5.5.7) and the CZO (Section 8175-5.7.7(g)) also currently indicate that gas should be piped offsite rather than flared, unless the permit applicant can demonstrate that doing so would not be feasible or practicable. In addition, VCAPCD regulates flaring at oil and gas facilities through its rules, regulations, monitoring and permitting programs. VCAPCD Rule 71.1 prohibits venting of organic gases to the atmosphere; therefore, 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. 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.

Based upon VCAPCD permit information, there are currently 24 VCAPCD permits to operate non-emergency flares covering 17 oil and gas operations as shown on Figure 4.12-5. Policy COS-7.8 would prohibit new oil and gas wells from using non-emergency flaring (i.e., primary flares) of gases produced during resource extraction, except in cases of emergency and for testing.

If gases are not allowed to be continuously flared, depending on the volume of gas produced, this gas could be converted to electricity for connection to the electric grid or used to run equipment onsite (e.g. heater treaters, separators, glycol reboilers, compressors, vapor recovery units) which is typically done in conjunction with flaring. The gas produced by extraction activities may either not be needed for production onsite (e.g. used for equipment) or may far exceed the quantity that can be utilized onsite and would require flaring transport via tanker truck or sale through a major gas transmission pipeline. Consequently, the most economically feasible option for the drilling of new oil wells would be at facilities with existing smaller gathering or minor pipelines which feed into the gas transmission network, which is operated locally by Southern California Gas Company (SoCalGas).

There are several challenges involved with injecting gas into the intrastate transmission network. First, the gas must be of a sufficient quality for SoCalGas to accept the injection. In some areas of the county, the gas extracted naturally meets these standards, in other areas onsite treatment would be required. Also, as shown in Figure 4.12-5, oil and gas resources may be in areas that are located some distance from the interstate backbone of transmission. In these cases, operators would need to construct pipelines to achieve connections or identify existing gathering lines and negotiate connection with the owner of those lines. Finally, there is no guarantee that SoCalGas would accept the gas generated by the wells. The utility's ability to receive gas while maintaining appropriate system pressures within the pipes, as mandated for safety by the California Public Utilities Commission, is dependent on flows from all points of receipt, physical pipeline and storage conditions, and end-use demand. If needed, transmitted gas may be stored by SoCalGas in one of the four underground storage facilities located in Southern California, the closest to Ventura County being the La Goleta Natural Gas Storage Facility, located in Goleta, California.

In 2016, the Bentley Family Limited Partnership prepared a *Gas Disposal/Utilization – Viability and Analysis of Alternatives to Flaring Study*. The study was completed as part of a permit modification for the Ventura County Planning Division for the continued operation of nine existing oil and gas wells and associated equipment within an existing oil and gas production facility located near the city of Ojai in the unincorporated county (Permit case no. PL15-0187). The study concluded that alternatives to the facility's existing practice of continuous primary flaring of approximately 15 to 42 Mcf/day of gas, which if sold at a total natural gas price of \$30.00 to \$80.00 per day, would not support the costs associated with transporting produced gas to market or other beneficial uses as an alternative onsite flaring. These alternatives included the following:

1. **Transport via Truck as Compressed Natural Gas (CNG) or Liquefied Natural Gas (LNG):** This alternative was determined to be economically infeasible as there are limited numbers of local companies that can physically transport methane gas at the pressures required and no infrastructure exists to off load these gases at receiving facilities. Both CNG and LNG would require the construction of an onsite processing facility. In addition, the processing of LNG requires energy to continually process and freeze to -260F in order to turn it into a liquid, which would result in higher processing and facility costs.
2. **Sales through Utility Pipeline Access:** This alternative was determined to be economically infeasible as the estimated cost of constructing metering, monitoring, processing, gas conditioning and compression facilities would total \$ 1 million to \$1.5 million. In addition, easements would need to be obtained from public and private property owners to install the required pipeline needed to connect to the Southern California Gas distribution system located several miles from the project site. The value of gas generated at the project site (\$80.00) per day would not support the costs associated with this alternative.
3. **Electrical Generation/Micro Turbines:** This alternative was determined to be infeasible as there is insufficient electrical load on the property to justify the installation of micro turbines or other types of electrical generating equipment. This alternative would require either an electrical load on the property, utility access, or both. As of the date of the study, the California Public Utilities Commission did not allow small (less than 1 Mcf) electricity operators (other than solar) access to connect to the electrical grid. Therefore, there exists insufficient electrical load on the property to justify the installation of micro turbines or other types of electrical generating equipment.

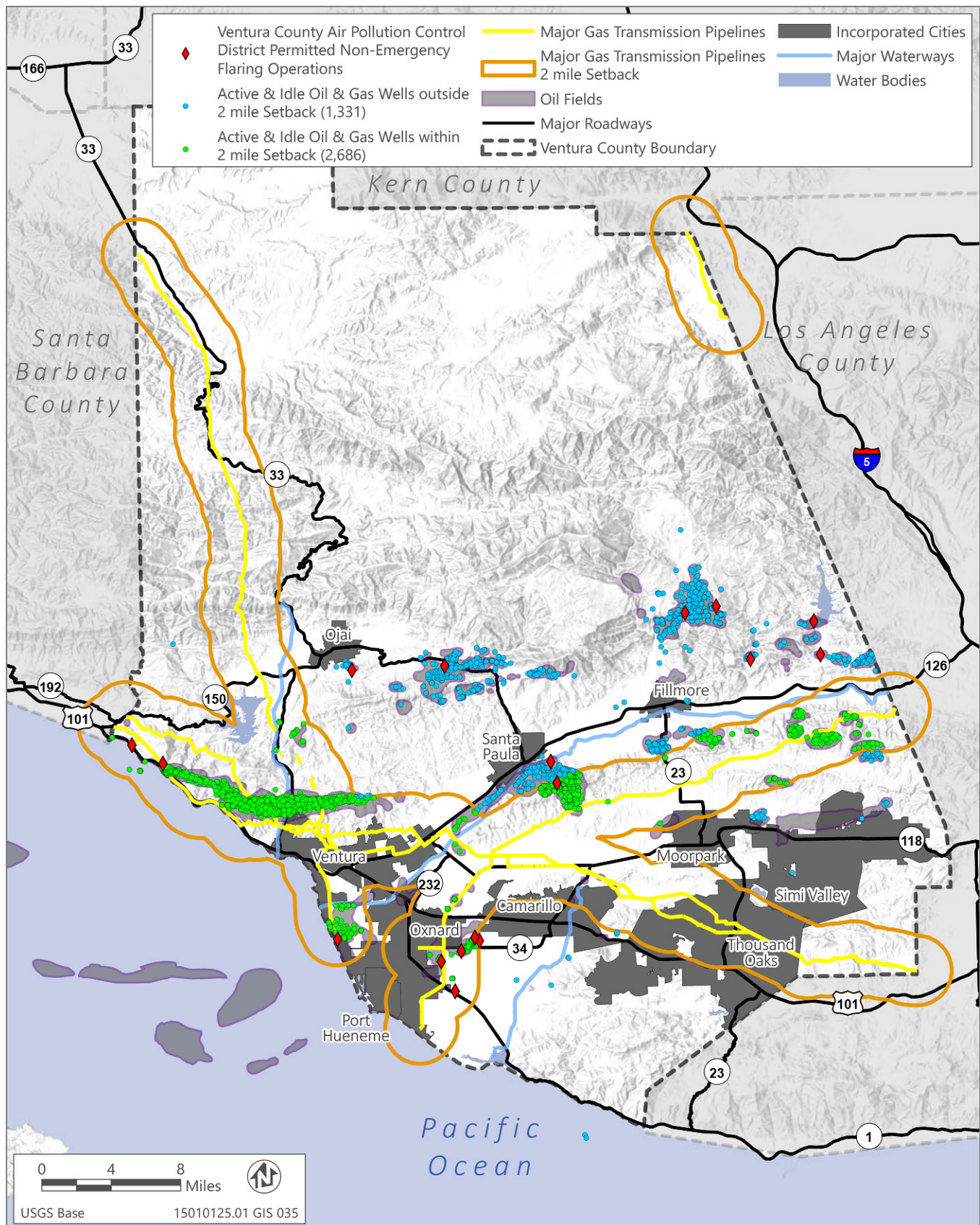


Figure 4.12-5 Major Gas Transmission Pipelines Map

4. **Agricultural or Industrial Use on the Property:** This alternative was determined infeasible as there is no need for commercial scale heating, such as would be required by a greenhouse or commercial enterprise.
5. **Reactivation of Sales through Private Vintage/CRC Former Gas Pipeline:** This alternative was determined to be infeasible as this pipeline is not owned by the oil operator and reactivation of this pipeline is beyond their control and it is unknown whether this former gas pipeline would be reactivated.

As discussed above, for purposes of this analysis it is assumed that oil operators located beyond the two-mile radius of a major gas transmission pipeline 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. Figure 4.12-5 depicts 1,331 active and idle oil wells located outside of a two-mile radius of a major gas transmission line. These operators located beyond the two-mile radius, and in more remote locations, likely consist of smaller oil producing operations that are not extracting a large amount of oil and therefore not producing a large amount of gas. The clustering of a larger volume of active and idle oil wells can be seen on Figure 4.12-5, which depicts 2,686 active and idle oil wells located inside of the two-mile of a major gas transmission line. The larger clustering of these operations is likely a function of greater opportunities for oil extraction and technological or economically feasible access to a major gas transmission line. However, those oil operators within the two-mile radius of a major gas transmission pipeline which currently rely upon flaring to dispose of produced gas may be effectively prohibited by Policy COS-7.8 if connection to existing smaller gathering or minor pipelines is not technologically or economically feasible for future discretionary oil and gas wells.

Therefore, Policy COS-7.8 could effectively prohibit the development of new discretionary oil and gas wells located outside of a two-mile radius of a major gas transmission pipeline by most operators due to the costs and technical complexities associated with treating the gas onsite, constructing pipeline interconnections, and connecting to the SoCalGas transmission line which does not guarantee the acceptance of gas on a daily basis, or limitations on the minimal amount of gas that can be used onsite. However, the volume of loss for this petroleum resource would likely be at a smaller scale for oil operators located outside of a two-mile radius of a major gas transmission pipeline due to the presumably small size of these operations.

In some cases, however, pipelines may be constructed to meet the requirements in Policies COS-7.7 and COS-7.8. The NCZO and CZO both encourage the construction of pipelines to convey oil. The County has authority to issue permits for construction of pipelines on non-federal land in the unincorporated county and for all of the Coastal Zone except for the ocean-adjacent portion of the Coastal Zone located within the California Coastal Commission's (CCC) original jurisdiction. Development of oil and gas resources on existing leases in tidelands and submerged areas is subject to the regulatory authority of the California State Lands Commission. In addition, the CCC issues permits in the portion of the Coastal Zone located within its original jurisdiction, and the California Department of Transportation issues permits for oil pipelines intruding into the rights of way for State highways.

All of these types of discretionary permits are subject to CEQA or other environmental review. Anticipated effects of pipeline construction would be consistent with the overall land disturbance described for physical development anticipated with implementation of the 2040 General Plan. As discussed above, due to the technical and economic infeasibility of constructing new oil, gas or produced water pipelines, the County does not anticipate these policies would result in the construction of a large number of new pipelines and thus does not anticipate that these construction-related impacts would occur often. However, potential environmental impacts from pipeline construction on traffic and circulation, air and water quality, and cultural, archeological and paleontological resources may occur. Additionally, construction activities and risks associated with pipeline operation may result in potential impacts on biological resources; however, NCZO 8107-5.5.5(d) and CZO 8175-5.7.7(e)(3) require pipelines to be routed away from sensitive biological habitats and other areas when feasible. These programmatic effects are included in the environmental impact analyses of this draft EIR.

Policies COS-7.7 and COS-7.8 could result in the loss of known petroleum resources of value to the region and the State because Policies COS-7.7 and COS-7.8 would mandate infrastructure that may be technologically or economically infeasible to install. However, based on the analysis above, the volume of loss for this petroleum resource would likely be at a smaller scale and concentrated on oil operators located outside of a two-mile radius of a major oil or gas transmission pipeline. The policies would nonetheless render a substantial quantity of petroleum resources inaccessible and result in the loss of availability of known petroleum resources of value to the region and the State in at least some parts of the plan area. This impact would be **potentially significant**.

Mitigation Measures

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 or and for testing purposes consistent with federal, State, and local regulations.

Significance after Mitigation

As proposed in the 2040 General Plan, Policies COS-7.7 and COS-7.8 could benefit air quality, limit the release of greenhouse gases and avoid other environmental impacts that could result from new oil and gas development that would not be authorized under the policies. Conversely, the policies could limit access to petroleum resources in the plan area by effectively restricting the locations where new oil and gas development could occur. Mitigation Measures PR-2 and PR-3 would revise these policies by allowing the County to approve new 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. This flexibility is reflected in the County's current zoning ordinances. The proposed revision to Policy COS-7.7 would also allow trucking during emergencies and for testing purposes, consistent with the County's existing zoning ordinances.

In particular, Mitigation Measure PR-3 would revise Policy COS-7.8 to allow the County to approve new oil and gas wells that utilize flaring or venting of produced gas during exploration and production operations if the County determines that collecting, using or removing gases emitted from new oil and gas wells and production facilities without flaring or venting is technologically, economically, or otherwise infeasible. And Mitigation Measure PR-2 would revise Policy COS-7.7 to allow the County to approve new oil and gas wells that utilize trucking of crude oil and produced water during exploration and production operations if the County determines that it is infeasible for the operator to convey the oil and dispose the produced water without trucking. Mitigation Measure PR-2 would also revise Policy COS-7.7 to authorize trucking in cases of emergency and for safety testing purposes, as may be necessitated by operators to comply with federal, state and local regulations (i.e., Pipeline and Hazardous Material Safety Agency and the State Fire Marshall safety testing of pipelines, DOGGR safety testing of oil and gas wells, and the CPUC safety testing of facilities used in the gathering, transmission and distribution of gas). Without allowing conveyance of crude oil and produced water via truck for testing purposes, Policy COS-7.7 would effectively prohibit an operator's ability to secure any federal, State, or local agency's permits which require such testing thereby rendering oil operations infeasible.

The County Board of Supervisors, in considering Mitigation Measures PR-2 and PR-3, must weigh the importance of allowing access to local oil and gas resources with the known local environmental consequences of oil and gas production operations. Under CEQA, the decision-making authority must balance, as applicable, the environmental, economic, legal, social, technological, or other benefits of a project against its unavoidable environmental impacts when determining whether to approve the project. 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 which may be caused by new oil and gas production, could also 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 petroleum. As lead agency, the County must consider and balance these competing environmental, economic, social and other interests in determining whether to adopt, reject or revise Mitigation Measures PR-2 and PR-3 which, as explained above, would provide more flexibility for the County to approve new oil and gas development compared to Policies COS-7.7 and COS-7.8.

By continuing to allow the County's approval of new oil and gas wells that utilize flaring or venting of produced gas and/or trucking of oil and produced water in situations where there is no feasible alternative, 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. This impact would be reduced to **less than significant**.

4.13 NOISE AND VIBRATION

This section evaluates the potential effects of implementing the 2040 General Plan on existing noise and vibration levels related to construction, traffic, industrial, commercial, agricultural uses, railroads, and airports. As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based primarily on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments on the notice of preparation included concerns regarding noise source from airports, rail, and agriculture operations, as well as, concerns regarding noise impacts related to exploration for and production of oil and gas. These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

4.13.1 Background Report Setting Updates

REGULATORY SETTING

The Background Report (Appendix B) accurately describes the regulatory setting for the purpose of this evaluation in Section 11.6, “Noise and Vibration.” There is no additional information necessary to understand the potential noise and vibration impacts of the 2040 General Plan.

ENVIRONMENTAL SETTING

In addition to the information provided in Section 11.6, “Noise and Vibration,” of the Background Report (Appendix B), the following information is relevant to understanding and evaluating the potential noise and vibration impacts of the 2040 General Plan.

The existing traffic noise evaluation included in the Background Report (Appendix B) analyzed a number of roadway segments that are located outside of the County’s jurisdiction. In addition, the traffic noise assessment included in the Background Report (pages 11-88 to 11-97) was based on traffic data from 2014 and 2015. Since the preparation of the Background Report, more recent traffic data are available. For the purposes of the analysis, the traffic noise modeling was updated to only evaluate roadway and highway segments within the unincorporated portions of the county that are regularly counted by the County’s Public Works Agency and to include updated traffic counts conducted in 2017 and 2018. Table 4.13-1 provides the modeled existing noise levels at 50 feet from the roadway, as well as distances to the 60, 65, and 70 A-weighted decibel (dBA) community noise equivalent level (CNEL) contour for all modeled roadways. Detailed noise modeling inputs are provided in Appendix E.

Table 4.13-1 Existing Noise Levels and Noise Contour Distances

Corridor and Segment		Noise (dBA CNEL) at 50 feet from Roadway	Noise Contour Distance in Feet		
			60 dBA	65 dBA	70 dBA
1	Aggen Road north of Los Angeles Avenue (SR 118)	54.7	29	9	3
2	Balcom Canyon Road south of South Mountain Road	56.4	44	14	4
3	Balcom Canyon Road north of Los Angeles Avenue (SR 118)	56.4	44	14	4
4	Bardsdale Avenue east of Sespe Street	56.7	47	15	5
5	Beardsley Road north of Central Avenue	61.2	133	42	13
6	Box Canyon Road south of Santa Susana Pass Road	58.4	69	22	7
7	Bradley Road north of Los Angeles Avenue (SR 118)	62.2	165	52	16
8	Briggs Road south of Telegraph Road	62.9	197	62	20
9	Briggs Road north of Telegraph Road	58.7	74	24	7
10	Bristol Road west of Montgomery Avenue	65.0	317	100	32
11	Broadway Road west of Grimes Canyon Road (SR 23)	58.3	68	21	7
12	Burnham Road south of Baldwin Road (SR 150)	55.8	38	12	4
13	Burnham Road east of Santa Ana Road	54.9	31	10	3
14	Calle Yucca north of Camino Manzanitas	54.2	26	8	3
15	Camino Dos Rios west of Lynn Road	56.8	48	15	5
16	Canada Larga Road east of Ventura Avenue	53.0	20	6	2
17	Casitas Vista Road west of Ojai Freeway (SR 33)	55.8	38	12	4
18	Center School Road south of Los Angeles Avenue (SR 118)	56.0	40	13	4
19	Center Street (Piru) west of Telegraph Road (SR 126)	54.2	26	8	3
20	Central Avenue west of Ventura Freeway (US 101)	67.0	505	160	51
21	Central Avenue west of Santa Clara Avenue	66.7	468	148	47
22	Central Avenue east of Vineyard Avenue (SR 232)	63.5	224	71	22
23	Channel Islands Boulevard west of Rice Avenue	67.6	579	183	58
24	Creek Road east of Country Club Drive	53.1	20	6	2
25	Creek Road east of Ventura Avenue (SR 33)	59.9	97	31	10
26	Donlon Road north of La Cumbre Road	51.1	13	4	1
27	Doris Avenue east of Victoria Avenue	63.7	234	74	23
28	El Roblar Drive west of Maricopa Highway (SR 33)	57.3	53	17	5
29	Etting Road east of Dodge Road	60.5	112	35	11
30	Fairview Road east of Maricopa Highway (SR 33)	51.2	13	4	1
31	Fairway Drive north of Valley Vista Drive	56.6	45	14	5
32	West Fifth Street east of North Harbor Boulevard	59.0	79	25	8
33	Foothill Road west of Peck Road	61.1	128	40	13
34	Foothill Road west of Briggs Road	56.2	42	13	4
35	Foothill Road east of North Wells Road	61.7	149	47	15
36	Foothill Road east of Saticoy Avenue	63.2	207	66	21
37	Gonzales Road east of North Harbor Boulevard	63.3	213	67	21
38	Grimes Canyon Road north of Los Angeles Avenue (SR 118)	61.5	140	44	14
39	Guiberson Road east of Chambersburg Road (SR 23)	57.3	53	17	5
40	Harbor Boulevard north of Gonzales Road	70.6	1153	365	115
41	Harbor Boulevard south of Gonzales Road	70.3	1074	340	107
42	Howe Road east of Torrey Road	50.7	12	4	1
43	Hueneme Road east of Las Posas Road	67.1	512	162	51
44	Hueneme Road east of Nauman Road	66.6	452	143	45
45	Hueneme Road east of Wood Road	66.1	412	130	41

Corridor and Segment		Noise (dBA CNEL) at 50 feet from Roadway	Noise Contour Distance in Feet		
			60 dBA	65 dBA	70 dBA
46	Hueneme Road east of Olds Road	67.9	620	196	62
47	Kanan Road east of Lindero Canyon Road	66.0	399	126	40
48	Kanan Road east of Hollytree Drive/Oak Hills Drive	66.0	399	126	40
49	Kanan Road south of Tamarind Street	67.7	590	187	59
50	La Luna Avenue south of Lomita Avenue	56.4	44	14	4
51	Laguna Road east of Pleasant Valley Road	60.0	101	32	10
52	Las Posas Road north of East Fifth Street (SR 34)	67.1	510	161	51
53	Las Posas Road south of East Fifth Street (SR 34)	67.3	537	170	54
54	Las Posas Road south of Hueneme Road	65.6	361	114	36
55	Lewis Road south of Pleasant Valley Road	69.0	788	249	79
56	Lewis Road north of Potrero Road	67.9	617	195	62
57	Lockwood Valley Road west of Kern County Line	56.8	48	15	5
58	Lockwood Valley Road east of Maricopa Highway (SR 33)	47.3	5	2	1
59	Lomita Avenue east of Tico Road	58.0	63	20	6
60	Main Street (Piru) north of Telegraph Road (SR 126)	55.8	38	12	4
61	Moorpark Road north of Santa Rosa Road	70.4	1100	348	110
62	Old Telegraph Road west of Grand Avenue	57.8	60	19	6
63	Olds Road north of Hueneme Road	60.0	101	32	10
64	Olivas Park Drive west of Victoria Avenue	68.2	659	208	66
65	Pasadena Avenue east of Sespe Street	50.7	12	4	1
66	Patterson Road south of Doris Avenue	51.9	15	5	2
67	Pleasant Valley Road south of East Fifth Street (SR 34)	69.4	861	272	86
68	Pleasant Valley Road west of Las Posas Road	57.8	60	19	6
69	Portero Road east of Lake Sherwood Drive East	62.6	180	57	18
70	Portero Road west of Stafford Road	58.7	73	23	7
71	Portero Road west of Hidden Valley Road	50.6	12	4	1
72	Portero Road at Milepost 2.75	57.4	55	18	6
73	Portero Road east of Lewis Road	62.7	188	59	19
74	Rice Avenue south of East Fifth Street (SR 34)	71.7	1468	464	147
75	Rice Avenue north of Channel Islands Boulevard	70.8	1200	379	120
76	Rice Avenue north of Hueneme Road	59.8	96	30	10
77	Rice Road south of Lomita Avenue	59.0	80	25	8
78	Rose Avenue south of Los Angeles Avenue (SR 118)	62.8	191	60	19
79	Rose Avenue south of Central Avenue	63.7	233	74	23
80	Rose Avenue north of Collins Street	65.9	388	123	39
81	Santa Ana Boulevard east of Ventura River	58.5	70	22	7
82	Santa Ana Road south of Baldwin Road (SR 150)	53.1	21	6	2
83	Santa Ana Road south of Santa Ana Boulevard	57.9	62	19	6
84	Santa Clara Avenue north of Friedrich Road	69.0	803	254	80
85	Santa Clara Avenue south of Los Angeles Avenue (SR 118)	69.9	983	311	98
86	Santa Rosa Road west of Moorpark Road	70.7	1175	371	117
87	Santa Rosa Road west of East Las Posas Road	69.0	787	249	79
88	Santa Susana Pass Road east of Katherine Road	58.2	66	21	7
89	Sespe Street north of South Mountain Road	61.6	144	45	14
90	Sespe Street south of Pasadena Avenue	55.7	37	12	4
91	South Mountain Road east of Balcom Canyon Road	54.9	31	10	3

Corridor and Segment		Noise (dBA CNEL) at 50 feet from Roadway	Noise Contour Distance in Feet		
			60 dBA	65 dBA	70 dBA
92	South Mountain Road south of Santa Clara River	56.1	41	13	4
93	Stockton Road east of Balcom Canyon Road	51.6	15	5	1
94	Sturgis Road west of Pleasant Valley Road	63.8	239	76	24
95	Tapo Canyon Road south of Bennett Road	52.8	19	6	2
96	Telegraph Road west of Briggs Road	64.8	304	96	30
97	Telegraph Road west of Olive Road	64.7	292	92	29
98	Tico Road north of Ventura Avenue (SR 150)	56.4	44	14	4
99	Tierra Rejada Road east of Moorpark Freeway (SR 23)	71.2	1323	419	132
100	Torrey Road south of Telegraph Road (SR 126)	56.0	40	13	4
101	Valley Vista Drive south of Calley Aurora	59.0	80	25	8
102	Ventura Avenue north of Canada Larga Road	56.8	48	15	5
103	Ventura Avenue north of Shell Road	59.0	80	25	8
104	Victoria Avenue south of Olivas Park Drive	73.8	2386	755	239
105	Walnut Avenue north of Los Angeles Avenue (SR 118)	53.3	21	7	2
106	Wendy Drive north of Gerald Drive	63.2	207	65	21
107	Wood Road south of Hueneme Road	58.7	74	24	7
108	Wood Road south of East Fifth Street (SR 34)	67.3	537	170	54
109	Wooley Road west of Rice Avenue	67.4	547	173	55
110	Yerba Buena Road north of Pacific Coast Highway (SR 1)	49.4	9	3	1
Freeways					
111	SR 1 at Calleguas Creek	70.7	1179	373	118
112	SR 1 at Seacliff Colony, Junction SR 101	66.9	488	154	49
113	SR 1 at Las Cruces, SR 101, Mobil Oil Pier	59.0	80	25	8
114	SR 23 at Grimes Canyon Road	68.6	726	229	73
115	SR 23 at Junction SR 126, Ventura Road	67.1	508	161	51
116	SR 33 at West Junction SR 150, Baldwin Road	66.7	465	147	47
117	SR 33 at Los Padres National Forest Boundary	55.1	33	10	3
118	SR 33 at Sespe Gorge Maintenance Station	50.0	10	3	1
119	SR 33 at Ventura/Santa Barbara County Line	53.3	21	7	2
120	SR 34 at Junction SR 118, Los Angeles Avenue	67.7	590	187	59
121	U.S. Highway 101 at Victoria Avenue	80.9	12207	3860	1221
122	U.S. Highway 101 at Ventura/Santa Barbara County Line	78.9	7798	2466	780
123	SR 118 at Junction SR 232 (Westbound)	74.6	2882	912	288
124	SR 118 at SR 34, Somis Road (Westbound)	71.8	1530	484	153
125	SR 118 at Grimes Canyon Road	72.1	1632	516	163
126	SR 118 at West Junction SR 23, Moorpark Avenue	71.7	1475	466	147
127	SR 150 at Santa Barbara/Ventura County Line	n/a			
128	SR 150 at Junction SR 33 South (South)	63.0	197	62	20
129	SR 150 at Santa Paula North City Limit	57.7	58	18	6
130	SR 232 and Junction SR 118	64.8	303	96	30

Notes: SR = State Route; dBA = a-weighted decibels

Gray shaded cells reflect roadway segments exceeding 60 dBA CNEL at 50 feet from the roadway centerline.

All modeling assumes average pavement, level roadways (less than 1.5 percent grade), constant traffic flow, and does not account for shielding of any type or finite roadway adjustments. All noise levels are reported as A-weighted noise levels.

Source: Modeled by Ascent Environmental in 2019; based on traffic data provided by GHD (2019).

4.13.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

Construction

To assess potential short-term noise and vibration impacts that could result from construction activities associated with future development under the 2040 General Plan, typical construction source noise and vibration levels were determined based on methodologies, reference noise levels, and usage factors from the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment* (FTA 2006) and the Federal Highway Administration (FHWA) *Roadway Construction Noise Model User's Guide* (FHWA 2006). Reference levels are noise and vibration levels for specific equipment or activity types that are well documented in the field of acoustics.

Specific equipment and construction site locations of future development are not available at this time. However, to evaluate potential construction noise and vibration impacts, typical construction equipment used for general construction phases, such as site preparation/foundation work, utility improvements, roadway improvements, and vertical construction, were analyzed.

Operations

Assessment of potential long-term (operational) noise impacts resulting from increases in traffic volumes on State highways and County-operated roadways in the unincorporated areas was conducted using modeling based on the California Department of Transportation's (Caltrans) traffic noise analysis protocol and technical noise supplement (Caltrans 2013), and the 2016 Ventura County Transportation Commission countywide travel demand model. Traffic assumptions were based on an analysis provided by GHD, which used the 2018 Baseline Model for Ventura County as well as the 2040 Ventura County General Plan Land Use Model, allowing for an analysis of growth trends within the unincorporated county roadways (GHD 2019). To assess noise impacts, traffic noise levels under existing and forecasted growth (year 2040) conditions for affected roadway segments were modeled. The modeling conducted does not account for the acoustic dampening effects of any natural or human-made shielding (e.g., the presence of vegetation, berms, walls, or buildings) and, consequently, represents worst-case noise levels.

To assess noise and vibration impacts from railroads, the *Transit Noise and Vibration Impact Assessment* (FTA 2006) was used to determine approximate vibration levels in close proximity to rail lines. Railroad data (e.g., engine type, trains per day) for the county were obtained from Amtrak (2016), Metrolink (2014), and the Multi-County Goods Movement Action Plan (2008). Using this data, railroad noise generated by Amtrak and Metrolink commuter diesel locomotives and general freight movement was modeled based on Noise Impact Assessment Guidelines for assessing railroad and transit noise (FTA 2006, Amtrak 2016, cited in Ventura County 2018; Metrolink 2014, cited in Ventura County 2018; Los Angeles County Metropolitan Transportation Authority et. al 2008).

Aircraft noise impacts on existing and future noise-sensitive land uses were evaluated using noise contours provided in the *Airport Comprehensive Land Use Plan for Ventura County* (ACLUP; Ventura County Airport Land Use Commission 2000), the *Naval Base Ventura County Point Mugu Air Installations Compatible Use Zones Program* and the land uses identified in the General Plan Land Use Diagram.

Stationary sources, primarily from agricultural and industrial land uses, were also evaluated based on the County's noise standards. Long-term (operational) impacts were based on reference noise emission levels, measured noise levels for activities and equipment associated agricultural and industrial land uses within the plan area, and standard attenuation rates and modeling techniques.

In response to 2019 revisions to the State CEQA Guidelines (Public Resources Code Section 15126.2) and the 2015 California Supreme Court case, *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, impacts from exposure of a project to environmental hazards are not considered significant effects unless a project exacerbated the risks from such hazards. However, lead agencies retain the authority, separate and apart from CEQA, to include a review of potential impacts of the environment on a project when a project is undertaken by a lead agency, such as the 2040 General Plan. The 2040 General Plan is a comprehensive document that broadly establishes policy, not only related to the environment, but also related to public health and safety. Therefore, the analysis of noise impacts in this section considers whether the 2040 General Plan could cause or exacerbate noise impacts and whether the 2040 General Plan could result in impacts from exposure to noise. The discussion of potential impacts from exposure to noise is provided for information purposes only and is neither required by CEQA nor subject to its requirements.

THRESHOLDS OF SIGNIFICANCE

As discussed in the "Approach to the Environmental Analysis" section, the thresholds used to determine the significance of the 2040 General Plan's impacts are based on the County's adopted Initial Study Assessment Guidelines (ISAG), which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project's impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, the noise threshold in ISAG Section 21 was modified into two separate thresholds; one threshold related to temporary construction noise based on the *Ventura County Construction Noise Threshold Criteria and Control Plan* (Advanced Engineering Acoustics 2005), and one threshold related to permanent noise based on the County's noise standards identified within the 2040 General Plan.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant noise or vibration impact if it would:

- ▶ Generate a substantial temporary increase in ambient noise levels at noise-sensitive land uses in excess of the following standards established by the *Ventura County Construction Noise Threshold Criteria and Control Plan*:
 - 75 dBA hourly equivalent noise level (L_{eq}) during daytime hours (7:00 a.m. to 7:00 p.m. weekdays or 9:00 a.m. to 7:00 p.m. weekends and holidays), or an increase of 3 dBA L_{eq} above ambient levels, when construction lasts 0 to 3 days.

- 70 dBA L_{eq} during daytime hours (7:00 a.m. to 7:00 p.m. weekdays or 9:00 a.m. to 7:00 p.m. weekends and holidays), or an increase of 3 dBA L_{eq} above ambient levels, when construction lasts 4 to 7 days.
- 65 dBA L_{eq} during daytime hours (7:00 a.m. to 7:00 p.m. weekdays or 9:00 a.m. to 7:00 p.m. weekends and holidays), or an increase of 3 dBA L_{eq} above ambient levels, when construction lasts 1 to 2 weeks.
- 60 dBA L_{eq} during daytime hours (7:00 a.m. to 7:00 p.m. weekdays or 9:00 a.m. to 7:00 p.m. weekends and holidays), or an increase of 3 dBA L_{eq} above ambient levels, when construction lasts 2 to 8 weeks.
- 55 dBA L_{eq} during daytime hours (7:00 a.m. to 7:00 p.m. weekdays or 9:00 a.m. to 7:00 p.m. weekends and holidays), or an increase of 3 dBA L_{eq} above ambient levels, when construction lasts more than 8 weeks.
- 50 dBA L_{eq} during the hours of 7:00 p.m. to 10:00 p.m. or an increase of 3 dBA L_{eq} above ambient levels.
- 45 dBA L_{eq} during the hours of 10:00 p.m. to 7:00 p.m. weekdays or 10:00 p.m. to 9:00 a.m. weekends and holidays, or an increase of 3 dBA L_{eq} above ambient levels.
- ▶ Generate a substantial permanent increase in ambient noise levels at noise-sensitive land uses in excess of the following standards:
 - For noise generated from traffic on roadways and heavy industrial activities, indoor noise levels in habitable rooms must not exceed 45 dBA CNEL or outdoor noise levels must not exceed 60 dBA CNEL or 65 dBA L_{eq} during any one hour.
 - For noise generated from railways, indoor noise levels habitable rooms must not exceed 45 dBA CNEL or outdoor noise levels must not exceed 60 dBA CNEL or 65 dBA L_{eq} during any one hour and outdoor noise levels must not exceed 60 dBA sound level exceeded 10 percent of the time (L_{10}) during any one hour.
 - For noise generated from stationary sources, ongoing noise levels near sensitive receptors, as measured at the exterior wall of the building, must not exceed:
 - 55 dBA L_{eq} or ambient noise level plus 3 dBA, whichever is greater, during the hours of 6:00 a.m. to 7:00 p.m.
 - 50 dBA L_{eq} or ambient noise level plus 3 dBA, whichever is greater, during the hours of 7:00 p.m. to 10:00 p.m.
 - 45 dBA L_{eq} or ambient noise level plus 3 dBA, whichever is greater, during the hours of 10:00 p.m. to 6:00 a.m.
- ▶ Expose noise-sensitive land uses to excessive aircraft noise by locating new discretionary residential land uses within a 60 dBA CNEL aircraft noise contour unless interior noise levels can be mitigated to a maximum 45 dBA CNEL.
- ▶ Include construction activities involving blasting, pile-driving, vibratory compaction, demolition, and drilling or excavation which exceed the vibration threshold criteria provided in the Transit Noise and Vibration Impact Assessment, as detailed below:
 - Generate excessive groundborne vibration or groundborne noise that exceeds the construction vibration damage criteria listed in Table 4.13-2 and could result in damage to nearby buildings.

Table 4.13-2 Construction Vibration Damage Criteria

Building Category	PPV (in/sec)	Approximate Lv
Reinforced-concrete, steel or timber (no plaster)	0.5	102
Engineered concrete and masonry (no plaster)	0.3	98
Non-engineered timber and masonry buildings	0.2	94
Buildings extremely susceptible to vibration damage	0.12	90

Notes: RMS velocity in decibels (VdB) re 1 micro-inch/second.

PPV = peak particle velocity; in/sec = inches per second; Lv = velocity level in decibels

Source: Transit Noise and Vibration Impact Assessment, Table 12-3.

- Generate excessive groundborne vibration or groundborne noise that exceeds the following maximum-acceptable vibration criteria for annoyance or interference with vibration-sensitive activities (FTA 2006):
 - 65 vibration decibels (VdB), referenced to 1 micro-inch per second and based on the RMS velocity amplitude, for land uses where low ambient vibration is essential for interior operations (e.g., hospitals, high-tech manufacturing, laboratory facilities).
 - 80 VdB for residential uses and buildings where people normally sleep.
 - 83 VdB for institutional land uses with primarily daytime operations (e.g., schools, churches, clinics, offices) (FTA 2006).
- Generate new or additional transit uses or heavy vehicle (e.g., semi-truck or bus) trips on uneven roadways located within proximity to sensitive uses that has the potential to either individually or when combined with other recently approved, pending, and probable future projects, exceed the threshold criteria of the transit use thresholds shown in Table 4.13-3 below.

Table 4.13-3 Screening Distances for Vibration Assessment

Vibration-Generating Transit Use	Critical Distance for Land Use Categories* (Distance in feet from Right-of-Way or Property Line)		
	Category 1	Category 2	Category 3
Steel-Wheeled/Steel-Rail Vehicle Transit Uses			
Conventional Commuter Railroad	600	200	120
Rail Rapid Transit	600	200	120
Light Rail Transit	450	150	100
Intermediate Capacity Transit	200	100	50
Rubber-Tire Heavy Vehicle Uses			
Rubber-Tire Heavy Vehicle Uses (if not previously screened out)	100	50	—

Notes:

* Category 1: Buildings where vibration would interfere with operations within the building, including levels that may be well below those associated with human annoyance. Examples include: concert halls; vibration-sensitive research and manufacturing; hospitals with vibration-sensitive equipment; and, university research operations.

Category 2: All residential land uses and any buildings where people sleep, such as hotels and hospitals.

Category 3: Schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference.

For the purposes of screening procedures, concert halls and television studios should be evaluated as Category 1, and theaters and auditoriums should be evaluated as Category 2.

Source: Transit Noise and Vibration Impact Assessment, Table 9.2

ISSUES NOT DISCUSSED FURTHER

The Area Plans for communities of El Rio/Del Norte, Lake Sherwood/Hidden Valley, North Ventura Avenue, Oak Park, Ojai Valley, Piru, and Thousand Oaks were reviewed for policies and implementation programs specific to these Area Plans that would potentially have impacts on the environment with respect to noise. The 2040 General Plan would not result in substantive changes to Area Plan policies and implementation programs related to noise or vibration generated by construction, traffic, or airport and rail operations. The Area Plan policies and implementation programs related to these issues are consistent with the policies and implementation programs of the 2040 General Plan, which are addressed in the following discussions. Therefore, the environmental effects of the Area Plan policies and implementation programs are not addressed separately in this section.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to noise and, specifically, the thresholds of significance identified above, include the following:

Hazards and Safety Element

- ▶ **Policy HAZ-9.1: Limiting Unwanted Noise.** The County shall prohibit discretionary development which would be impacted by noise or generate project-related noise which cannot be reduced to meet the standards prescribed in Policy Haz-9.2. This policy does not apply to noise generated during the construction phase of a project. (SO) *[Source: Existing GPP Policy 2.16.2.2]*
- ▶ **Policy HAZ-9.2: Noise Compatibility Standards.** The County shall review discretionary development for noise compatibility with surrounding uses. The County shall determine noise based on the following standards:
 1. New noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed CNEL 60 or $L_{eq}1H$ of 65 dB(A) during any hour.
 2. New noise sensitive uses proposed to be located near railroads shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed L_{10} of 60 dB(A)
 3. New noise sensitive uses proposed to be located near airports:
 - a. Shall be prohibited if they are in a Community Noise Equivalent Level (CNEL) 65 or greater, noise contour; or
 - b. Shall be permitted in the Community Noise Equivalent Level (CNEL) 60 to CNEL 65 noise contour area only if means will be taken to ensure interior noise levels of CNEL 45 or less.
 4. New noise generators, proposed to be located near any noise sensitive use, shall incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor, measured at the exterior wall of the building, does not exceed any of the following standards:

- a. $L_{eq}1H$ of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.;
 - b. $L_{eq}1H$ of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.; and
 - c. $L_{eq}1H$ of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m.
5. Construction noise shall be evaluated and, if necessary, mitigated in accordance with the Construction Noise Threshold Criteria and Control Measures (Advanced Engineering Acoustics 2005).

(RDR) *[Source: Existing GPP Policy 2.16.2.1, modified]*

- ▶ **Policy HAZ-9.3: Development Along Travel Routes.** The County shall evaluate discretionary development for noise generated by project-related traffic along the travel route to the nearest intersection which allows for movement of traffic in multiple directions. In all cases, the evaluation of project-related roadway noise shall be evaluated along the travel route(s) within 1,600 feet of the project site. (RDR) *[Source: New Policy]*
- ▶ **Policy HAZ-9.4: Acoustical Analysis Required.** The County shall require an acoustical analysis by a qualified acoustical engineer for discretionary development involving noise exposure or noise generation in excess of the established standards. The analysis shall provide documentation of existing and projected noise levels at on-site and off-site receptors and shall recommend noise control measures for mitigating adverse impacts. (RDR) *[Source: Existing GPP Policy 2.16.2.1, modified]*
- ▶ **Policy HAZ-9.5 Site and Building Design.** The County shall require discretionary development and County-initiated projects to comply with adopted noise standards through proper site and building design features, such as building location and orientation, setbacks, natural barriers and vegetation, and building construction. The County shall only consider sound walls if noise mitigation measures have been evaluated or integrated into the project and found infeasible. (RDR) *[Source: New Policy]*
- ▶ **Policy HAZ-9.6: Airport Noise Compatibility.** The County shall use the aircraft noise analysis prepared for local airports or the noise contours from the current Point Mugu Air Installations Compatible Use Zones (AICUZ) study, as most appropriate for a project location, as an accurate mapping of the long-term noise impact of the airport's aviation activity. The County shall restrict new discretionary residential land uses to areas outside of the 60 decibel Community Noise Equivalence Level (dB CNEL) aircraft noise contour unless interior noise levels can be mitigated to meet a maximum 45 dB CNEL. (RDR) *[Source: New Policy, NBVC JLUS]*
- ▶ **Policy HAZ-9.7: Noise Control Priorities.** The priorities for noise control for discretionary development shall be as follows:
 1. Reduction of noise emissions at the source.
 2. Attenuation of sound transmission along its path, using barriers, landform modification, dense plantings, building orientation and placement, and the like.
 3. Rejection of noise at the reception point using noise control building construction, hearing protection or other means.

(RDR) *[Source: Existing GPP Policy 2.16.2.3, modified]*

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.13-1: Expose Sensitive Receptors to Construction Noise Levels That Exceed Applicable Standards

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

Future development under the 2040 General Plan would generate temporary noise level increases on and adjacent to individual construction sites. Because there are no specific plans or time scales for individual, future development projects, it is not possible to determine exact noise levels, locations, or time period for construction. Although the 2040 General Plan would preserve 88 percent of the county as open space, it would allow for development in close proximity to existing communities. Demolition and construction activity may occur near existing residences and noise-sensitive receptors and could extend over the course of eight or more weeks. In order to provide the most conservative assessment, this analysis evaluates whether future demolition and construction activity would potentially exceed the County's daytime construction noise standard of 55 dBA L_{eq} from 7:00 a.m. to 7:00 p.m. on weekdays or 9:00 a.m. to 7:00 p.m. on weekends and holidays. This analysis also evaluates the potential for construction noise to exceed the County's evening and nighttime noise standards of 50 dBA L_{eq} during the hours of 7:00 p.m. to 10:00 p.m.; 45 dBA L_{eq} during the hours of 10:00 p.m. to 7:00 p.m. on weekdays or 10:00 p.m. to 9:00 a.m. on weekends and holidays; or an increase of 3 dBA L_{eq} above ambient noise levels.

Construction noise can be characterized based on the type of activity and associated equipment needed and, in this analysis, is evaluated by considering noise levels associated with site preparation/foundation work, utility improvements (e.g., trenching, pipe/transmission line installation), roadway improvements (e.g., grading, paving), and vertical construction (e.g., residential, commercial, or other structures), with and without pile driving. Reference noise levels for typical construction equipment required for these activities are shown below in Table 4.13-4.

Table 4.13-4 Reference Noise Levels from Typical Construction Equipment

Equipment Type	Typical Noise Level (L _{max} dBA) @ 50 feet
Backhoe	80
Concrete Mixer	85
Compactor	80
Crane/Lift	85
Dozer	85
Dump Truck	84
Excavator	85
Flat Bed Truck	84
Front End Loader	80
Generator	70
Grader	85
Impact Pile Driver	95
Paver	89
Roller	85
Pickup Trucks	55

Note: Assumes all equipment is fitted with a properly maintained and operational noise control device, per manufacturer specifications. Noise levels listed are manufacture-specified noise levels for each piece of heavy construction equipment.

L_{max} = maximum instantaneous noise level

Source: FTA 2006

Assuming simultaneously operating equipment and typical reference noise levels for construction equipment, representative noise levels for the various types of construction activity are shown below in Table 4.13-5. Based on reference noise levels for typical construction equipment and activities, building construction noise without pile driving could range from approximately 86 dBA L_{eq} to 91 dBA maximum instantaneous noise level (L_{max}) at 50 feet from the source and with pile driving could range from approximately 91 dBA L_{eq} to 97 dBA L_{max} at 50 feet from the source. Refer to Appendix E for modeling inputs and results.

Table 4.13-5 Noise Levels from Construction Activities

Construction Activity	Noise Level (L _{eq} dBA) @ 50 feet	Noise Level (L _{max} dBA) @ 50 feet
Site Preparation/Foundation Work	87.5	91.5
Building Construction	86.2	90.9
Building Construction with Pile Driving	90.5	96.6
Roadway Construction/Improvements	87.2	91.1
Utility Installation/Improvements	88.1	92.1

Note: Assumes all equipment is fitted with a properly maintained and operational noise control device, per manufacturer specifications. Noise levels listed are manufacture-specified noise levels for each piece of heavy construction equipment.

L_{eq} = equivalent noise level; L_{max} = maximum instantaneous noise level

Source: FTA 2006

Noise levels from point sources such as construction sites typically attenuate at a rate of about 6 dBA per doubling of distance from the source. Therefore, considering building construction noise of 96.6 dBA L_{max} , areas within 6,033 feet of a construction site with heavy-duty equipment may be exposed to noise levels exceeding the County's daytime noise standard of 55 dBA L_{max} . In addition, some construction work, such as utility installation and roadway improvements may occur during nighttime hours to reduce traffic impacts and could expose existing or future sensitive receptors to noise levels that may disrupt sleep and exceed the applicable evening and nighttime exterior construction noise threshold of 50 dBA L_{max} and 45 dBA L_{max} , within 6,356 feet and 11,303 feet, respectively.

2040 General Plan Policy HAZ-9.4 requires that an acoustical analysis be conducted by a qualified acoustical engineer for discretionary development that would recommend noise control measures for mitigation of adverse impacts. In addition, Policy HAZ-9.2 requires construction noise be evaluated and, if necessary, mitigated in accordance with the Construction Noise Threshold Criteria and Control Plan (Advanced Engineering Acoustics, November 2005). Future development under the 2040 General Plan would be required to comply with the following construction equipment noise control measures identified in the *Construction Noise Threshold Criteria and Control Plan*, which would substantially lessen construction noise levels. In addition, the permitting agency/department would review the construction noise reduction measures and confirm compliance with the County's noise threshold criteria.

1. Minimize the use of impact devices, such as jackhammers, pavement breakers, and hoe rams. Where possible, use concrete crushers or pavement saws rather than hoe rams for tasks such as concrete or asphalt demolition and removal.
2. Pneumatic impact tools and equipment used at the construction site shall have intake and exhaust mufflers recommended by the manufacturers thereof, to meet relevant noise limitations.
3. Provide impact noise producing equipment, i.e. jackhammers and pavement breaker(s), with noise attenuating shields, shrouds or portable barriers or enclosures, to reduce operating noise.
4. Line or cover hoppers, conveyor transfer points, storage bins, and chutes with sound-deadening material (e.g., apply wood or rubber liners to metal bin impact surfaces).
5. Provide upgraded mufflers, acoustical lining or acoustical paneling for other noisy equipment, including internal combustion engines.
6. Avoid blasting and impact-type pile driving.
7. Use alternative procedures of construction and select a combination of techniques that generate the least overall noise and vibration. Such alternative procedures could include the following:
 - a. Use electric welders powered by remote generators.
 - b. Mix concrete at non-sensitive off-site locations, instead of on-site.
 - c. Erect prefabricated structures instead of constructing buildings on-site.
8. Use construction equipment manufactured or modified to reduce noise and vibration emissions, such as:
 - a. Electric instead of diesel-powered equipment.

- b. Hydraulic tools instead of pneumatic tools.
 - c. Electric saws instead of air- or gasoline-driven saws.
9. Turn off idling equipment when not in use for periods longer than 30 minutes.
10. Operate equipment so as to minimize banging, clattering, buzzing, and other annoying types of noises, especially near residential and other noise sensitive areas during the evening and nighttime hours.
11. To the extent feasible, configure the construction site in a manner that keeps noisier equipment and activities as far as possible from noise sensitive locations and nearby buildings.
12. All back-up alarms should be disarmed at 8:00 p.m. and not reactivated until 7:00 a.m. on weekdays and 9:00 a.m. on weekends and local holidays. Signal persons and strobe lights must be used during periods when the back-up alarms are disarmed.
13. Maximize physical separation, as far as practicable, between noise generators and noise receptors. Separation includes following measures:
- a. Provide enclosures for stationary items of equipment and noise barriers around particularly noisy areas at the project site.
 - b. Locate stationary equipment to minimize noise and vibration impacts on community.
14. Minimize noise-intrusive impacts during most noise sensitive hours.
- a. Plan noisier operations during times of highest ambient noise levels.
 - b. Keep noise levels relatively uniform; avoid excessive and impulse noises.
 - c. Turn off idling equipment.
 - d. Phase in start-up and shut-down of project site equipment.
15. Select truck routes for material delivery and spoils disposal so that noise from heavy-duty trucks will have a minimal impact on noise sensitive receptors. Proposed truck haul routes are to be submitted to the County Transportation Division for approval.
- a. Conduct truck loading, unloading, and hauling operations so noise and vibration are kept to a minimum.
 - b. Route construction equipment and vehicles carrying soil, concrete or other materials over streets and routes that will cause the least disturbance to residents in the vicinity of construction sites and haul roads.
 - c. Do not operate haul trucks on streets within 250 feet of school buildings during school hours or hospitals and nursing homes at any time, without a variance.
 - d. Submit haul routes and staging areas to the County Transportation Division for approval, at least 30 days before the required usage date.

If the above listed construction equipment noise control measures are not sufficient to reduce noise levels, the project would be required to install construction noise curtains, blankets, and barriers or receptor noise control barriers detailed in the *Construction Noise Threshold Criteria and Control Plan* to ensure noise levels are reduced below applicable County noise standards.

The 2040 General Plan policies and measures listed in the *Construction Noise Threshold Criteria and Control Plan* would require individual development projects to include numerous noise-reducing techniques and minimize noise at receiving land uses. The effectiveness of these measures would be ensured through Policies HAZ-9.4 and HAZ-9.2, which require the implementation of mitigation developed through project-level acoustical analyses. Because noise levels generated from construction under the 2040 General Plan would be temporary and reduction measures would be implemented to ensure construction noise would not exceed applicable standards at nearby receptors, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.13-2: Expose New Sensitive Land Uses to Traffic Noise

Future development under the 2040 General Plan would include new residential and other noise-sensitive uses that could be exposed to long-term noise exceeding the County's standard for noise generated from roadways of 45 dBA CNEL for indoor noise levels and 60 dBA CNEL for outdoor noise levels. Potential sources of noise exposure include: (1) traffic on U.S. Highway 101, State Route (SR) 23, SR 118, and SR 126, county-wide expressways arterial roadways, and collector and local roadways; and (2) transportation sources related to operations of commercial, industrial, and agricultural sites that are adjacent to or near noise-sensitive uses.

The 2040 General Plan anticipates population and housing would increase by approximately 4 percent above 2015 conditions and would include land use designations to allow growth within or near existing communities, as shown on Figure 3-2b. As such, development would likely occur adjacent to existing roadways and freeways could potentially expose new noise-sensitive receptors to traffic noise. Traffic noise modeling was conducted for the 2040 plan horizon and included projected noise levels at 50 feet from roadway segments as well as distances to the 60, 65, and 70 dBA CNEL contours. Table 4.13-6 includes the calculated future noise levels at 50 feet from County roadways, as well as distances to the 60, 65, and 70 dBA CNEL noise contour for all modeled roadways. As shown in Table 4.13-7, under Impact 4.13-3, with only minor exceptions, traffic noise is expected to increase only slightly along major roadways in the county over the life of the 2040 General Plan.

The 2040 General Plan includes policies and implementation programs that address the placement of new noise-sensitive receptors near transportation noise sources. Specifically, Policy HAZ-9.1 prohibits development which would be impacted by noise or generate project-related noise which cannot be reduced to meet the standards prescribed in Policy HAZ-9.2. Policy HAZ-9.2 requires that new noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed 45 dBA CNEL and outdoor noise levels do not exceed 60 dBA CNEL or 65 dBA L_{eq} during any hour. In addition, Policy HAZ-9.4 requires an acoustical analysis be performed for discretionary development to determine existing and projected noise levels at on-site and off-site receptors and to recommend noise control measures for mitigating adverse impacts. Policy HAZ-9.5 requires proper site and building design features to comply with adopted noise standards.

Table 4.13-6 Projected 2040 Noise Levels and Contours

Corridor and Segment		Noise (dBA CNEL) at 50 feet from Roadway	Noise Contour Distance in Feet		
			60 dBA	65 dBA	70 dBA
1	Aggen Road north of Los Angeles Avenue (SR 118)	55.0	32	10	3
2	Balcom Canyon Road south of South Mountain Road	58.2	65	21	7
3	Balcom Canyon Road north of Los Angeles Avenue (SR 118)	57.1	51	16	5
4	Bardsdale Avenue east of Sespe Street	56.7	47	15	5
5	Beardsley Road north of Central Avenue	62.8	190	60	19
6	Box Canyon Road south of Santa Susana Pass Road	59.3	86	27	9
7	Bradley Road north of Los Angeles Avenue (SR 118)	62.2	166	52	17
8	Briggs Road south of Telegraph Road	62.9	197	62	20
9	Briggs Road north of Telegraph Road	58.8	75	24	8
10	Bristol Road west of Montgomery Avenue	65.9	387	123	39
11	Broadway Road west of Grimes Canyon Road (SR 23)	61.0	125	40	13
12	Burnham Road south of Baldwin Road (SR 150)	57.7	59	19	6
13	Burnham Road east of Santa Ana Road	57.3	54	17	5
14	Calle Yucca north of Camino Manzanitas	54.2	26	8	3
15	Camino Dos Rios west of Lynn Road	57.2	52	17	5
16	Canada Larga Road east of Ventura Avenue	54.4	28	9	3
17	Casitas Vista Road west of Ojai Freeway (SR 33)	58.6	72	23	7
18	Center School Road south of Los Angeles Avenue (SR 118)	56.2	42	13	4
19	Center Street (Piru) west of Telegraph Road (SR 126)	54.7	29	9	3
20	Central Avenue west of Ventura Freeway (US 101)	67.9	619	196	62
21	Central Avenue west of Santa Clara Avenue	67.9	620	196	62
22	Central Avenue east of Vineyard Avenue (SR 232)	64.5	284	90	28
23	Channel Islands Boulevard west of Rice Avenue	68.4	693	219	69
24	Creek Road east of Country Club Drive	55.8	38	12	4
25	Creek Road east of Ventura Avenue (SR 33)	62.6	181	57	18
26	Donlon Road north of La Cumbre Road	52.0	16	5	2
27	Doris Avenue east of Victoria Avenue	64.9	311	98	31
28	El Roblar Drive west of Maricopa Highway (SR 33)	57.7	58	18	6
29	Etting Road east of Dodge Road	62.0	159	50	16
30	Fairview Road east of Maricopa Highway (SR 33)	51.4	14	4	1
31	Fairway Drive north of Valley Vista Drive	57.3	53	17	5
32	West Fifth Street east of North Harbor Boulevard	59.6	92	29	9
33	Foothill Road west of Peck Road	61.1	128	40	13
34	Foothill Road west of Briggs Road	56.2	42	13	4
35	Foothill Road east of North Wells Road	62.1	161	51	16
36	Foothill Road east of Saticoy Avenue	63.3	211	67	21
37	Gonzales Road east of North Harbor Boulevard	63.3	213	67	21
38	Grimes Canyon Road north of Los Angeles Avenue (SR 118)	61.5	142	45	14
39	Guiberson Road east of Chambersburg Road (SR 23)	57.7	58	18	6
40	Harbor Boulevard north of Gonzales Road	70.6	1,153	365	115
41	Harbor Boulevard south of Gonzales Road	70.3	1,074	340	107
42	Howe Road east of Torrey Road	51.6	14	5	1
43	Hueneme Road east of Las Posas Road	67.1	512	162	51
44	Hueneme Road east of Nauman Road	66.9	495	156	49
45	Hueneme Road east of Wood Road	66.2	417	132	42

Corridor and Segment		Noise (dBA CNEL) at 50 feet from Roadway	Noise Contour Distance in Feet		
			60 dBA	65 dBA	70 dBA
46	Hueneme Road east of Olds Road	68.7	746	236	75
47	Kanan Road east of Lindero Canyon Road	66.6	460	145	46
48	Kanan Road east of Hollytree Drive/Oak Hills Drive	66.6	454	143	45
49	Kanan Road south of Tamarind Street	68.2	667	211	67
50	La Luna Avenue south of Lomita Avenue	56.4	44	14	4
51	Laguna Road east of Pleasant Valley Road	60.4	109	34	11
52	Las Posas Road north of East Fifth Street (SR 34)	67.7	587	186	59
53	Las Posas Road south of East Fifth Street (SR 34)	67.8	601	190	60
54	Las Posas Road south of Hueneme Road	65.6	361	114	36
55	Lewis Road south of Pleasant Valley Road	69.0	788	249	79
56	Lewis Road north of Potrero Road	67.9	617	195	62
57	Lockwood Valley Road west of Kern County Line	56.8	48	15	5
58	Lockwood Valley Road east of Maricopa Highway (SR 33)	49.0	8	3	1
59	Lomita Avenue east of Tico Road	59.1	82	26	8
60	Main Street (Piru) north of Telegraph Road (SR 126)	56.7	46	15	5
61	Moorpark Road north of Santa Rosa Road	70.7	1,168	369	117
62	Old Telegraph Road west of Grand Avenue	59.2	82	26	8
63	Olds Road north of Hueneme Road	61.4	137	43	14
64	Olivas Park Drive west of Victoria Avenue	68.9	769	243	77
65	Pasadena Avenue east of Sespe Street	50.7	12	4	1
66	Patterson Road south of Doris Avenue	52.5	18	6	2
67	Pleasant Valley Road south of East Fifth Street (SR 34)	69.4	861	272	86
68	Pleasant Valley Road west of Las Posas Road	68.2	663	210	66
69	Portero Road east of Lake Sherwood Drive East	62.8	193	61	19
70	Portero Road west of Stafford Road	59.9	97	31	10
71	Portero Road west of Hidden Valley Road	52.4	17	6	2
72	Portero Road at Milepost 2.75	58.6	73	23	7
73	Portero Road east of Lewis Road	62.7	188	59	19
74	Rice Avenue south of East Fifth Street (SR 34)	72.9	1,936	612	194
75	Rice Avenue north of Channel Islands Boulevard	71.9	1,559	493	156
76	Rice Avenue north of Hueneme Road	59.8	96	30	10
77	Rice Road south of Lomita Avenue	59.8	96	30	10
78	Rose Avenue south of Los Angeles Avenue (SR 118)	64.2	265	84	26
79	Rose Avenue south of Central Avenue	64.5	279	88	28
80	Rose Avenue north of Collins Street	67.3	540	171	54
81	Santa Ana Boulevard east of Ventura River	58.8	76	24	8
82	Santa Ana Road south of Baldwin Road (SR 150)	54.6	29	9	3
83	Santa Ana Road south of Santa Ana Boulevard	60.7	119	37	12
84	Santa Clara Avenue north of Friedrich Road	69.0	803	254	80
85	Santa Clara Avenue south of Los Angeles Avenue (SR 118)	69.9	983	311	98
86	Santa Rosa Road west of Moorpark Road	70.8	1,203	380	120
87	Santa Rosa Road west of East Las Posas Road	69.0	801	253	80
88	Santa Susana Pass Road east of Katherine Road	58.2	66	21	7
89	Sespe Street north of South Mountain Road	61.6	144	45	14
90	Sespe Street south of Pasadena Avenue	55.7	37	12	4
91	South Mountain Road east of Balcom Canyon Road	55.1	32	10	3

Corridor and Segment		Noise (dBA CNEL) at 50 feet from Roadway	Noise Contour Distance in Feet		
			60 dBA	65 dBA	70 dBA
92	South Mountain Road south of Santa Clara River	58.4	69	22	7
93	Stockton Road east of Balcom Canyon Road	56.4	43	14	4
94	Sturgis Road west of Pleasant Valley Road	65.4	350	111	35
95	Tapo Canyon Road south of Bennett Road	52.8	19	6	2
96	Telegraph Road west of Briggs Road	65.2	331	105	33
97	Telegraph Road west of Olive Road	64.7	292	92	29
98	Tico Road north of Ventura Avenue (SR 150)	56.6	46	14	5
99	Tierra Rejada Road east of Moorpark Freeway (SR 23)	71.8	1,526	483	153
100	Torrey Road south of Telegraph Road (SR 126)	56.9	49	16	5
101	Valley Vista Drive south of Calley Aurora	59.5	88	28	9
102	Ventura Avenue north of Canada Larga Road	57.5	57	18	6
103	Ventura Avenue north of Shell Road	60.2	105	33	10
104	Victoria Avenue south of Olivas Park Drive	73.8	2,386	755	239
105	Walnut Avenue north of Los Angeles Avenue (SR 118)	53.3	21	7	2
106	Wendy Drive north of Gerald Drive	63.6	229	72	23
107	Wood Road south of Hueneme Road	58.8	75	24	7
108	Wood Road south of East Fifth Street (SR 34)	67.8	601	190	60
109	Wooley Road west of Rice Avenue	68.4	694	219	69
110	Yerba Buena Road north of Pacific Coast Highway (SR 1)	49.4	9	3	1
Freeways					
111	SR 1 at Calleguas Creek	73.7	2,368	749	237
112	SR 1 at Seacliff Colony, Junction SR 101	66.9	488	154	49
113	SR 1 at Las Cruces, SR 101, Mobil Oil Pier	59.1	81	26	8
114	SR 23 at Grimes Canyon Road	69.9	987	312	99
115	SR 23 at Junction SR 126, Ventura Road	67.7	585	185	59
116	SR 33 at West Junction SR 150, Baldwin Road	66.7	465	147	47
117	SR 33 at Los Padres National Forest Boundary	55.5	35	11	4
118	SR 33 at Sespe Gorge Maintenance Station	51.0	13	4	1
119	SR 33 at Ventura/Santa Barbara County Line	53.9	25	8	2
120	SR 34 at Junction SR 118, Los Angeles Avenue	68.4	692	219	69
121	U.S. Highway 101 at Victoria Avenue	80.9	12,207	3,860	1221
122	U.S. Highway 101 at Ventura/Santa Barbara County Line	79.5	8,815	2,787	881
123	SR 118 at Junction SR 232 (Westbound)	75.8	3,761	1,189	376
124	SR 118 at SR 34, Somis Road (Westbound)	72.5	1,787	565	179
125	SR 118 at Grimes Canyon Road	72.8	1,919	607	192
126	SR 118 at West Junction SR 23, Moorpark Avenue	71.7	1,475	466	147
127	SR 118 at East Junction SR 23, Spring Road	72.5	1,780	563	178
128	SR 150 at Santa Barbara/Ventura County Line	49.1	8	3	1
129	SR 150 at Junction SR 33 South (South)	63.0	197	62	20
130	SR 150 at Santa Paula North City Limit	59.0	80	25	8
131	SR 232 and Junction SR 118	65.8	381	120	38

Notes: SR = State Route; dBA = a-weighted decibels;

Gray shaded cells reflect roadway segments exceeding 60 dBA CNEL at 50 feet from the roadway centerline.

All modeling assumes average pavement, level roadways (less than 1.5% grade), constant traffic flow, and does not account for shielding of any type or finite roadway adjustments. All noise levels are reported as A-weighted noise levels.

Source: Modeled by Ascent Environmental in 2019; based on traffic data provided by GHD (2019).

Implementation of these policies and programs would ensure that future development located in areas with noise levels that potentially exceed acceptable standards would be evaluated and that appropriate sound attenuation techniques would be implemented on a case-by-case basis. Depending on the nature of future development and the location and source of noise, sound attenuation techniques may include site design to shield noise-sensitive uses from noise, special building standards to reduce interior noise, or the use of barriers to reduce exterior noise. The specific location, design, orientation, and type of development projects are unknown at this time and site-specific noise levels at new development sites cannot be determined. However, with 2040 General Plan implementation, if noise levels at new noise-sensitive receptors cannot be reduced below the County's standards, such development would be prohibited by Policy HAZ-9.1. Therefore, future development under the 2040 General Plan would not be exposed to noise levels that exceed County noise standards. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.13-3: Expose Existing Sensitive Receptors to Traffic-Noise Increases

Future development under the 2040 General Plan would increase noise levels along area roadways over the life of the plan. Table 4.13-7 compares calculated noise levels along major roadways in the county under existing conditions to those that could occur with traffic levels associated with projected growth within the 2040 planning horizon. To provide a point of comparison for existing and future noise conditions, noise levels were calculated at a distance of 50 feet from the roadway centerline. Noise levels at receptors farther away from roadway noise sources, or in locations with intervening topography, vegetation, or structures, would be lower than shown in the table.

Table 4.13-7 Comparison of Existing and Future Noise Levels Along Road Segments

Corridor and Segment		Noise (dBA CNEL) at 50 feet from Roadway		
		Existing (2019)	Future (2040)	Change
1	Aggen Road north of Los Angeles Avenue (SR 118)	54.7	55.0	0.4
2	Balcom Canyon Road south of South Mountain Road	56.4	58.2	1.7
3	Balcom Canyon Road north of Los Angeles Avenue (SR 118)	56.4	57.1	0.7
4	Bardsdale Avenue east of Sespe Street	56.7	56.7	0.0
5	Beardsley Road north of Central Avenue	61.2	62.8	1.6
6	Box Canyon Road south of Santa Susana Pass Road	58.4	59.3	1.0
7	Bradley Road north of Los Angeles Avenue (SR 118)	62.2	62.2	0.0
8	Briggs Road south of Telegraph Road	62.9	62.9	0.0
9	Briggs Road north of Telegraph Road	58.7	58.8	0.0
10	Bristol Road west of Montgomery Avenue	65.0	65.9	0.9
11	Broadway Road west of Grimes Canyon Road (SR 23)	58.3	61.0	2.7
12	Burnham Road south of Baldwin Road (SR 150)	55.8	57.7	2.0
13	Burnham Road east of Santa Ana Road	54.9	57.3	2.5
14	Calle Yucca north of Camino Manzanitas	54.2	54.2	0.0
15	Camino Dos Rios west of Lynn Road	56.8	57.2	0.4
16	Canada Larga Road east of Ventura Avenue	53.0	54.4	1.4
17	Casitas Vista Road west of Ojai Freeway (SR 33)	55.8	58.6	2.8
18	Center School Road south of Los Angeles Avenue (SR 118)	56.0	56.2	0.2
19	Center Street (Piru) west of Telegraph Road (SR 126)	54.2	54.7	0.5
20	Central Avenue west of Ventura Freeway (US 101)	67.0	67.9	0.9

Corridor and Segment		Noise (dBA CNEL) at 50 feet from Roadway		
		Existing (2019)	Future (2040)	Change
21	Central Avenue west of Santa Clara Avenue	66.7	67.9	1.2
22	Central Avenue east of Vineyard Avenue (SR 232)	63.5	64.5	1.0
23	Channel Islands Boulevard west of Rice Avenue	67.6	68.4	0.8
24	Creek Road east of Country Club Drive	53.1	55.8	2.7
25	Creek Road east of Ventura Avenue (SR 33)	59.9	62.6	2.7
26	Donlon Road north of La Cumbre Road	51.1	52.0	0.9
27	Doris Avenue east of Victoria Avenue	63.7	64.9	1.2
28	El Roblar Drive west of Maricopa Highway (SR 33)	57.3	57.7	0.4
29	Etting Road east of Dodge Road	60.5	62.0	1.5
30	Fairview Road east of Maricopa Highway (SR 33)	51.2	51.4	0.2
31	Fairway Drive north of Valley Vista Drive	56.6	57.3	0.7
32	West Fifth Street east of North Harbor Boulevard	59.0	59.6	0.7
33	Foothill Road west of Peck Road	61.1	61.1	0.0
34	Foothill Road west of Briggs Road	56.2	56.2	0.0
35	Foothill Road east of North Wells Road	61.7	62.1	0.3
36	Foothill Road east of Saticoy Avenue	63.2	63.3	0.1
37	Gonzales Road east of North Harbor Boulevard	63.3	63.3	0.0
38	Grimes Canyon Road north of Los Angeles Avenue (SR 118)	61.5	61.5	0.1
39	Guiberson Road east of Chambersburg Road (SR 23)	57.3	57.7	0.4
40	Harbor Boulevard north of Gonzales Road	70.6	70.6	0.0
41	Harbor Boulevard south of Gonzales Road	70.3	70.3	0.0
42	Howe Road east of Torrey Road	50.7	51.6	0.9
43	Hueneme Road east of Las Posas Road	67.1	67.1	0.0
44	Hueneme Road east of Nauman Road	66.6	66.9	0.4
45	Hueneme Road east of Wood Road	66.1	66.2	0.1
46	Hueneme Road east of Olds Road	67.9	68.7	0.8
47	Kanan Road east of Lindero Canyon Road	66.0	66.6	0.6
48	Kanan Road east of Hollytree Drive/Oak Hills Drive	66.0	66.6	0.6
49	Kanan Road south of Tamarind Street	67.7	68.2	0.5
50	La Luna Avenue south of Lomita Avenue	56.4	56.4	0.0
51	Laguna Road east of Pleasant Valley Road	60.0	60.4	0.3
52	Las Posas Road north of East Fifth Street (SR 34)	67.1	67.7	0.6
53	Las Posas Road south of East Fifth Street (SR 34)	67.3	67.8	0.5
54	Las Posas Road south of Hueneme Road	65.6	65.6	0.0
55	Lewis Road south of Pleasant Valley Road	69.0	69.0	0.0
56	Lewis Road north of Potrero Road	67.9	67.9	0.0
57	Lockwood Valley Road west of Kern County Line	56.8	56.8	0.0
58	Lockwood Valley Road east of Maricopa Highway (SR 33)	47.3	49.0	1.7
59	Lomita Avenue east of Tico Road	58.0	59.1	1.1
60	Main Street (Piru) north of Telegraph Road (SR 126)	55.8	56.7	0.9
61	Moorpark Road north of Santa Rosa Road	70.4	70.7	0.3
62	Old Telegraph Road west of Grand Avenue	57.8	59.2	1.4
63	Olds Road north of Hueneme Road	60.0	61.4	1.3
64	Olivas Park Drive west of Victoria Avenue	68.2	68.9	0.7
65	Pasadena Avenue east of Sespe Street	50.7	50.7	0.0
66	Patterson Road south of Doris Avenue	51.9	52.5	0.6
67	Pleasant Valley Road south of East Fifth Street (SR 34)	69.4	69.4	0.0

Corridor and Segment		Noise (dBA CNEL) at 50 feet from Roadway		
		Existing (2019)	Future (2040)	Change
68	Pleasant Valley Road west of Las Posas Road	57.8	68.2	10.4
69	Portero Road east of Lake Sherwood Drive East	62.6	62.8	0.3
70	Portero Road west of Stafford Road	58.7	59.9	1.2
71	Portero Road west of Hidden Valley Road	50.6	52.4	1.8
72	Portero Road at Milepost 2.75	57.4	58.6	1.2
73	Portero Road east of Lewis Road	62.7	62.7	0.0
74	Rice Avenue south of East Fifth Street (SR 34)	71.7	72.9	1.2
75	Rice Avenue north of Channel Islands Boulevard	70.8	71.9	1.1
76	Rice Avenue north of Hueneme Road	59.8	59.8	0.0
77	Rice Road south of Lomita Avenue	59.0	59.8	0.8
78	Rose Avenue south of Los Angeles Avenue (SR 118)	62.8	64.2	1.4
79	Rose Avenue south of Central Avenue	63.7	64.5	0.8
80	Rose Avenue north of Collins Street	65.9	67.3	1.4
81	Santa Ana Boulevard east of Ventura River	58.5	58.8	0.3
82	Santa Ana Road south of Baldwin Road (SR 150)	53.1	54.6	1.4
83	Santa Ana Road south of Santa Ana Boulevard	57.9	60.9	3.0
84	Santa Clara Avenue north of Friedrich Road	69.0	69.0	0.0
85	Santa Clara Avenue south of Los Angeles Avenue (SR 118)	69.9	69.9	0.0
86	Santa Rosa Road west of Moorpark Road	70.7	70.8	0.1
87	Santa Rosa Road west of East Las Posas Road	69.0	69.0	0.1
88	Santa Susana Pass Road east of Katherine Road	58.2	58.2	0.0
89	Sespe Street north of South Mountain Road	61.6	61.6	0.0
90	Sespe Street south of Pasadena Avenue	55.7	55.7	0.0
91	South Mountain Road east of Balcom Canyon Road	54.9	55.1	0.2
92	South Mountain Road south of Santa Clara River	56.1	58.4	2.3
93	Stockton Road east of Balcom Canyon Road	51.6	56.4	4.7
94	Sturgis Road west of Pleasant Valley Road	63.8	65.4	1.7
95	Tapo Canyon Road south of Bennett Road	52.8	52.8	0.0
96	Telegraph Road west of Briggs Road	64.8	65.2	0.4
97	Telegraph Road west of Olive Road	64.7	64.7	0.0
98	Tico Road north of Ventura Avenue (SR 150)	56.4	56.5	0.0
99	Tierra Rejada Road east of Moorpark Freeway (SR 23)	71.2	71.8	0.6
100	Torrey Road south of Telegraph Road (SR 126)	56.0	56.9	0.9
101	Valley Vista Drive south of Calley Aurora	59.0	59.5	0.4
102	Ventura Avenue north of Canada Larga Road	56.8	57.5	0.7
103	Ventura Avenue north of Shell Road	59.0	60.2	1.2
104	Victoria Avenue south of Olivas Park Drive	73.8	73.8	0.0
105	Walnut Avenue north of Los Angeles Avenue (SR 118)	53.3	53.3	0.0
106	Wendy Drive north of Gerald Drive	63.2	63.6	0.4
107	Wood Road south of Hueneme Road	58.7	58.8	0.0
108	Wood Road south of East Fifth Street (SR 34)	67.3	67.8	0.5
109	Wooley Road west of Rice Avenue	67.4	68.4	1.0
110	Yerba Buena Road north of Pacific Coast Highway (SR 1)	49.4	49.4	0.0
Freeways				
111	SR 1 at Calleguas Creek	70.7	73.7	3.0
112	SR 1 at Seacliff Colony, Junction SR 101	66.9	66.9	0.0
113	SR 1 at Las Cruces, SR 101, Mobil Oil Pier	59.0	59.1	0.1

Corridor and Segment		Noise (dBA CNEL) at 50 feet from Roadway		
		Existing (2019)	Future (2040)	Change
114	SR 23 at Grimes Canyon Road	68.6	69.9	1.3
115	SR 23 at Junction SR 126, Ventura Road	67.1	67.7	0.6
116	SR 33 at West Junction SR 150, Baldwin Road	66.7	66.7	0.0
117	SR 33 at Los Padres National Forest Boundary	55.1	55.5	0.3
118	SR 33 at Sespe Gorge Maintenance Station	50.0	51.0	1.0
119	SR 33 at Ventura/Santa Barbara County Line	53.3	53.9	0.6
120	SR 34 at Junction SR 118, Los Angeles Avenue	67.7	68.4	0.7
121	U.S. Highway 101 at Victoria Avenue	80.9	80.9	0.0
122	U.S. Highway 101 at Ventura/Santa Barbara County Line	78.9	79.5	0.5
123	SR 118 at Junction SR 232 (Westbound)	74.6	75.8	1.2
124	SR 118 at SR 34, Somis Road (Westbound)	71.8	72.5	0.7
125	SR 118 at Grimes Canyon Road	72.1	72.8	0.7
126	SR 118 at West Junction SR 23, Moorpark Avenue	71.7	71.7	0.0
127	SR 150 at Santa Barbara/Ventura County Line	n/a	49.1	n/a
128	SR 150 at Junction SR 33 South (Southbound)	63.0	63.0	0.0
129	SR 150 at Santa Paula North City Limit	57.7	59.1	1.4
130	SR 232 and Junction SR 118	64.8	65.8	1.0

Notes: SR = State Route; dBA = a-weighted decibels; n/a = not available

Gray shaded cells indicate a change in noise levels of 3 dBA or greater.

Source: Modeled by Ascent Environmental in 2019; based on traffic data provided by GHD (2019).

As Table 4.13-7 indicates, traffic associated with projected growth would increase noise along many of the roadways and result in a slight decrease on some roadways. Traffic volume increases could result in traffic noise levels exceeding the County's standard of 60 dBA CNEL for outdoor noise levels at existing noise-sensitive uses along roadways. Further, the 2040 General Plan could result in a substantial increase of 3 dBA or greater at locations currently exceeding the County's traffic noise standards.

Table 4.13-7 indicates that roadway segments along Pleasant Valley Road, west of Las Posas Road, and along Santa Ana Road, south of Santa Ana Boulevard, would experience an increase of 3 dBA or greater and would exceed 60 dBA CNEL at 50 feet from the roadway centerline. The roadway segment at Stockton Road, east of Balcom Canyon Road, would also experience an increase of 3 dBA or greater, but would not exceed 60 dBA CNEL at 50 feet from the roadway center line. The roadway segments along Broadway Road, west of Grimes Canyon Road, and along Creek Road, east of Ventura Avenue, do not exceed the County standard under existing conditions, but would under the 2040 General Plan. However, the increase in traffic noise would not be substantial (i.e., 3 dBA or greater) at these segments. In addition, SR 1 at Calleguas Creek would also experience an increase of 3 dBA or greater but currently exceeds 60 dBA CNEL at 50 feet from the roadway center line under existing conditions and would continue to exceed the County standard under the 2040 General Plan. In all other cases, traffic noise increases are less than 3 dBA.

Policies HAZ-9.3, HAZ-9.4, and HAZ-9.5 would require noise-generating development to be evaluated and implementation of noise control measures to reduce noise levels to acceptable levels. However, it is uncertain if recommended noise control measures would be sufficient to reduce noise levels generated by future development to acceptable levels for all future types of development in all locations and circumstances and there are no further policies related to traffic noise impacts on existing noise-sensitive uses. Therefore, this impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure NOI-1: New Policy HAZ-X: Implement Noise Control Measures for Traffic Noise

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

Policy HAZ-X: Implement Noise Control Measures for Traffic Noise

The County shall require noise control measures to be implemented along roadways for new discretionary development generating traffic noise if either of the following circumstances would exist:

- ▶ The discretionary development would result in traffic noise levels above a County noise compatibility standard stated in Policy HAZ 9.2 in an area where traffic noise levels, under existing conditions, do not exceed the County noise compatibility standard; or,
- ▶ The discretionary development would result in an increase in traffic noise levels of 3 dBA or greater in an area where traffic noise levels under existing conditions exceed a County noise compatibility standard stated in Policy HAZ 9.2.

Noise control measures may include increased vegetation, roadway pavement improvements and maintenance, and site and building design features. If such measures are not sufficient to reduce a new discretionary development's fair share of traffic-generated noise at sensitive receptors, a sound wall barrier may be constructed. All feasible noise reduction measures shall be implemented to ensure the development's fair share of traffic-generated noise is reduced, consistent with Policy HAZ 9.2.

Significance after Mitigation

With implementation of Mitigation Measure NOI-1, the 2040 General Plan would require discretionary development to implement noise reduction measures to reduce project-generated traffic noise. In many cases noise reduction measures would reduce traffic noise levels generated by a discretionary development at existing noise sensitive receptors to less than significant levels. However, there may be cases where noise reduction measures are either infeasible or inadequate for reducing traffic noise to less than significant levels. For example, if a new discretionary development would result in high-traffic or truck volumes on roadways near noise-sensitive receptors and, due to limited space within the County roadway right-of-way, a soundwall cannot be built, then the new discretionary development may result in project-generated traffic noise above the County standard. Therefore, because there may be cases where discretionary development would result in project-generated traffic noise above the County standard and such project-generated noise could not be reduced, and would therefore, result in a substantial noise level increase that would exceed County standards at existing noise-sensitive receptors, this impact would be **significant and unavoidable**.

Impact 4.13-4: Expose Noise-Sensitive Land Uses to Operational Stationary Noise That Exceeds Applicable Standards

As discussed in Section 11.6, "Noise and Vibration," of the Background Report (Appendix B), the primary sources of stationary noise in the county consist of industrial and agricultural operations, and miscellaneous sources such as a shooting range in Holser Canyon and a motocross facility near Piru. Major industrial noise sources include concrete and rock batch plants, sand and gravel mines, and Pepsi Cola and oil supply facilities. The 2040 General Plan would designate industrial land use areas throughout the county.

However, the amount of industrial land use proposed under the 2040 General Plan would be minor, totaling approximately 1,400 acres and less than 1 percent of the total county area. In addition, 2040 General Plan Policy HAZ-9.2 would require new stationary noise generators proposed near any noise sensitive use, to incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor would not exceed 55 dBA L_{eq} during daytime hours, 50 dBA L_{eq} during evening hours, 45 dBA L_{eq} during nighttime hours, and would not result in an ambient noise level increase of 3 dBA or greater. In addition, Policy HAZ-9.5 would require development to comply with adopted noise standards through proper site and building design features and Policy HAZ-9.1 would prohibit any discretionary development that would not meet County noise standards. The County's Coastal Zoning Ordinance and the County's Non-Coastal Zoning Ordinance also set noise standards for specific land uses including oil and gas exploration and production and mining and reclamation uses. Development under the 2040 General Plan would be subject to the County's zoning ordinances. Because the 2040 General Plan would not result in a substantial increase in stationary noise-generating uses and would implement policies to ensure noise-sensitive land uses are not exposed to noise levels above County noise standards, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.13-5: Expose Noise-Sensitive Land Uses to Airport Noise That Exceeds the Standards in the Ventura County Airport Comprehensive Land Use Plan

As discussed in Section 11.6, "Noise and Vibration," of the Background Report (see Appendix B), four airports are located in Ventura County; Camarillo Airport, Santa Paula Airport, Oxnard Airport, and the Naval Base Ventura County Point Mugu. The 2040 General Plan land use designations would not propose residential land uses, or any other sensitive land use, within a 60 CNEL aircraft noise contour of the Camarillo Airport, Santa Paula Airport, and Oxnard Airport, as outlined in the ACLUP. An existing residential community is located within the Naval Base Ventura County Point Mugu 60 – 65 dBA CNEL aircraft noise contour. Future residential development under the 2040 General Plan could occur in this existing community. All other land uses proposed within a 60 dBA CNEL aircraft noise contour consist of agricultural, open space, and State or federal facility land uses, which allow for minimal development of noise-sensitive uses (i.e., dwelling units with maximum densities ranging from 1 dwelling unit per 10 acres to 1 dwelling unit per 40 acres). However, 2040 General Plan Policy HAZ-9.6 would prohibit development within 60 CNEL noise contour unless interior noise levels can be mitigated to meet a maximum of 45 dBA CNEL. The 2040 General Plan policies would continue to apply if the ACLUP is updated and noise contours are recalculated. The 2040 General Plan would be consistent with the ALCUP and would not expose any noise-sensitive receptors to aircraft noise that exceeds ACLUP standards. This discussion of potential exposure to aircraft noise is provided for information purposes only and is neither required by CEQA nor subject to its requirements.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.13-6: Expose Sensitive Receptors to Construction Vibration Levels That Exceed Applicable Standards

Construction-related vibration has the potential to damage structures, cause cosmetic damage (e.g., crack plaster), or disrupt the operation of vibration-sensitive equipment. Vibration can also be a source of annoyance to individuals who live or work close to vibration-generating activities. Typical construction activities, such as the use of jackhammers, blasting, other high-power or vibratory tools, compactors, and tracked equipment, may generate substantial vibration (i.e., greater than 0.2 inch per second PPV) in the immediate vicinity, typically within 15 feet of the equipment.

Heavy construction operations such as large bulldozers, blasting, and pile drivers have the potential to generate the highest vibration levels and are the primary concern for structural damage when they occur in close proximity to structures. As shown in Table 4.13-8, the highest impact caused by equipment such as large bulldozers, blasting, and pile drivers can generate vibrations of 0.089, 1.130, and 1.518 inches per second of PPV at a distance of 25 feet, respectively. Regarding disruptive vibration levels, large dozers can result in vibration-noise levels of up to 87 VdB, blasting can result in vibration-noise levels of up to 109 VdB, and pile drivers in levels of up to 112 VdB. In addition, similar to construction noise, vibration levels would be variable depending on the type of construction project and related equipment use. Reference vibration levels for typical impact equipment are shown in Table 4.13-8.

Blasting is generally used to remove large rock outcroppings. Vibration levels generated by blasting activities would vary depending on project conditions, such as soil conditions, construction methods, and equipment used. Based on FTA's recommended procedure for applying a propagation adjustment to reference levels for blasting, vibration levels could exceed the threshold of significance of 0.2 inch per second PPV for structural damage within 80 feet of blasting activities (refer to Appendix E for modeling details).

Table 4.13-8 Construction Equipment Vibration Levels

Equipment		Peak Particle Velocity (PPV) at 25 Feet (Inches per Second)	Root Mean Square at 25 Feet (VdB)
Pile Driver (Impact)	Upper Range	1.518	112
	Typical	0.644	104
Pile Driver (Sonic)	Upper Range	0.734	105
	Typical	0.170	93
Vibratory Roller		0.210	95
Blasting		1.130	109
Clam Shovel Drop (Slurry Wall)		0.202	94
Hydrol Mill (Slurry Wall)	In Soil	0.008	66
	In Rock	0.017	75
Large Bulldozer		0.089	87
Caisson Drilling		0.089	87
Loaded Trucks		0.076	86
Jackhammer		0.035	79
Small Bulldozer		0.003	58

Source: FTA 2006

Regarding vibration annoyance, 65 VdB is conservatively used in this analysis, as it is unknown where construction activity would take place and what land use types could be affected. Based on FTA's recommended procedure for applying propagation adjustments to reference levels for blasting, vibration levels could exceed the threshold of significance within 730 feet of a sensitive land use (refer to Appendix E for modeling details).

Pile driving is used to provide foundation support for buildings and other structures. Based on FTA's recommended procedure for applying a propagation adjustment to reference levels for pile driving, vibration levels could exceed the threshold of significance of 0.2 inch per second PPV for structural damage within 100 feet of pile driving activities and could exceed the threshold of significance of 65 VdB for vibration annoyance or disturbance within 925 feet of a sensitive land use (refer to Appendix E for modeling details).

Much of the future development under the 2040 General Plan would occur near or within existing communities and would likely not require blasting or pile driving activities. In addition, adherence to the County's *Construction Noise Threshold Criteria and Control Plan*, as required by 2040 General Plan Policy HAZ-9.2, would require project contractors to avoid blasting and impact-type pile driving, to use alternative procedures of construction and select a combination of techniques that would generate the least overall noise and vibration, and to use construction equipment manufactured or modified to reduce noise and vibration emissions.

Compliance with the vibration reduction measures included in the *Construction Noise Threshold Criteria and Control Plan* would help minimize construction vibration; however, development under the 2040 General Plan could still result in vibration impacts if blasting and/or pile driving occur. In addition, 2040 General Plan Policy HAZ-9.1 includes an exemption for noise generated during construction and, therefore, does not prohibit discretionary development that would exceed the County's noise standards, listed in 2040 General Plan Policy HAZ-9.2, during construction. No policies or implementation programs are proposed that specifically address vibration impacts or pile driving and blasting activities. Therefore, it is possible that construction activities involving pile driving or blasting could occur and could result in vibration levels that disrupt nearby receptors and/or potentially damage nearby structures.

Although the *Construction Noise Threshold Criteria and Control Plan* would require individual construction projects to include numerous vibration-reducing techniques and minimize exposure at receiving land uses, at this time the location, intensity, and timing of future construction activities under the 2040 General Plan, as well as relative vibration levels at nearby receptors is unknown. Further no specific policies are in place or proposed that would avoid or minimize potential adverse effects from blasting and/or pile driving activities. Therefore, it cannot be determined if future development under the 2040 General Plan would generate vibration levels that would exceed applicable standards at nearby receptors, and this impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure NOI-2: Revised Policy HAZ-9.2: Noise Compatibility Standards

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

Policy HAZ-9.2: Noise Compatibility Standards

The County shall review discretionary development for noise compatibility with surrounding uses. The County shall determine noise based on the following standards:

1. New noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed CNEL 60 or $L_{eq}1H$ of 65 dB(A) during any hour.
2. New noise sensitive uses proposed to be located near railroads shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed L_{10} of 60 dB(A)
3. New noise sensitive uses proposed to be located near airports:
 - a. Shall be prohibited if they are in a Community Noise Equivalent Level (CNEL) 65 dB or greater, noise contour; or
 - b. Shall be permitted in the Community Noise Equivalent Level (CNEL) 60 dB to CNEL 65 dB noise contour area only if means will be taken to ensure interior noise levels of CNEL 45 dB or less.
4. New noise generators, proposed to be located near any noise sensitive use, shall incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor, measured at the exterior wall of the building, does not exceed any of the following standards:
 - a. $L_{eq}1H$ of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.;
 - b. $L_{eq}1H$ of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.; and
 - c. $L_{eq}1H$ of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m.
5. Construction noise and vibration shall be evaluated and, if necessary, mitigated in accordance with the Construction Noise Threshold Criteria and Control Measures Plan (Advanced Engineering Acoustics, November 2005).

Mitigation Measure NOI-3: New Implementation Program HAZ-X: Revise the Construction Noise Threshold Criteria and Control Plan

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program HAZ-X: Revise the Construction Noise Threshold Criteria and Control Plan

The County shall revise the Construction Noise Threshold Criteria and Control Plan to consider all potential vibration-inducing activities and include various measures, setback distances, precautions, monitoring programs, and alternative methods to traditional construction activities with the potential to result in structural damage or excessive groundborne noise. Items that shall be addressed in the plan include, but are not limited to, the following:

- ▶ Ground vibration-producing activities, such as pile driving and blasting, shall be limited to the daytime hours between 7:00 a.m. to 7:00 p.m. on weekdays or 9:00 a.m. to 7:00 p.m. on weekends and holidays.

- ▶ If pile driving is used, pile holes shall be predrilled to the maximum feasible depth to reduce the number of blows required to seat a pile.
- ▶ All construction equipment on construction sites shall be operated as far away from vibration-sensitive sites as reasonably possible.
- ▶ Earthmoving, blasting and ground-impacting operations shall be phased so as not to occur simultaneously in areas close to sensitive receptors, to the extent feasible. The total vibration level produced could be significantly less when each vibration source is operated at separate times.
- ▶ Minimum setback requirements for different types of ground vibration-producing activities (e.g., pile driving and blasting) for the purpose of preventing damage to nearby structures shall be established. Factors to be considered include the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the fragility/resiliency of the nearby structures. Established setback requirements (i.e., 100 feet) can be breached if a project-specific, site specific analysis is conducted by a qualified geotechnical engineer or ground vibration specialist that indicates that no structural damage would occur at nearby buildings or structures.
- ▶ Minimum setback requirements for different types of ground vibration producing activities (e.g., pile driving and blasting) for the purpose of preventing negative human response shall be established based on the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the type of sensitive receptor. Established setback requirements (i.e., 300 feet) can be breached only if a project-specific, site-specific, technically adequate ground vibration study indicates that the buildings would not be exposed to ground vibration levels in excess of 80 VdB, and ground vibration measurements performed during the construction activity confirm that the buildings are not being exposed to levels in excess of 80 VdB.
- ▶ All vibration-inducing activity within the distance parameters described above shall be monitored and documented for ground vibration noise and vibration noise levels at the nearest sensitive land use and associated recorded data submitted to Ventura County so as not to exceed the recommended FTA levels.
- ▶ Alternatives to traditional pile driving (e.g., sonic pile driving, jetting, cast-in-place or auger cast piles, nondisplacement piles, pile cushioning, torque or hydraulic piles) shall be considered and implemented where feasible to reduce vibration levels.

Significance after Mitigation

Implementation of Mitigation Measures NOI-2 and NOI-3 would require that pile driving and blasting not occur during sensitive times of the day (i.e., late evening through early morning). Additional measures would require the construction contractor to minimize vibration exposure to nearby receptors by locating equipment far from receptors, phasing operations, and predrilling holes for potential piles. Further, the County would revise the Construction Noise Threshold Criteria and Control Plan to include vibration control measures to further refine appropriate setback distances and identify and implement alternative methods to pile driving and blasting if required.

These vibration control measures would result in compliance with recommended levels to prevent structural damage. However, while these measures would substantially lessen human annoyance resulting from vibration levels, at this programmatic level of analysis it is not possible to conclude that vibration levels in all locations associated with all future development under the 2040 General Plan would be reduced below human annoyance levels; there could be future development that results in vibration levels that cause human annoyance. As a result this impact would be **significant and unavoidable**.

Impact 4.13-7: Expose Noise-Sensitive Land Uses to Railroad Noise and Vibration that Exceeds Applicable Standards

The 2040 General Plan does not propose new rail or transit uses, nor would the 2040 General Plan be expected substantially increase rail or transit demand resulting in the development of new transit uses within the county. As discussed further in Section 4.11, "Land Use and Planning," the 2040 General Plan and the Guidelines for Orderly Growth encourage development within the Existing Community and Urban area designations that and is compatible with the Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Strategy. Therefore, the moderate population growth anticipated through the planning horizon is not anticipated to generate substantial new demand for railroad and transit service and the 2040 General Plan would not generate an increase in railroad vibration.

However, several railways exist throughout the county, including Amtrak, Metrolink, Fillmore and Western Railway, Union Pacific Railroad, and Ventura County Railroad Company, and the 2040 General Plan would include residential land uses near existing rail lines. As stated in Section 11.6, "Noise and Vibration," of the Background Report (Appendix B), noise from railroads is generated by diesel locomotive engines, warning horns, and gate bells at railroad crossings. Noise-sensitive receptors within 165 feet of freight trains, 164 feet of the Metrolink rail line, and 154 feet of the Amtrak rail line would be exposed to noise levels above the County's standard of 60 dBA CNEL for outdoor noise levels (see Appendix B). The 2040 General Plan designates residential land uses along rail lines throughout the county and could expose noise-sensitive land uses to railroad noise above the County's standard of 60 dBA CNEL. However, 2040 General Plan Policies-HAZ-9.2 and HAZ-9.6 would ensure indoor noise levels in habitable rooms do not exceed 45 dBA CNEL and outdoor noise levels do not exceed 60 dBA L₁₀ and would require an acoustical analysis to determine noise levels and provide appropriate reduction measures. As required by 2040 General Plan Policy HAZ-9.1, the County would prohibit discretionary development which would be impacted by noise that cannot be reduced to meet the standards prescribed in Policy HAZ-9.2. Because no new transit or rail uses are anticipated and development would only be constructed within close proximity to rail lines if the County noise standard of 60 dBA CNEL for outdoor noise levels and 45 dBA CNEL for indoor habitable areas would be met, the 2040 General Plan would not expose sensitive land uses to railroad noise or vibration. This discussion of potential exposure to railroad noise and vibration is provided for information purposes only and is neither required by CEQA nor subject to its requirements.

Mitigation Measures

No mitigation is required for this impact.

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4.14 POPULATION AND HOUSING

This section evaluates the potential effects of implementing the 2040 General Plan on population and housing, including the potential to reduce affordable housing, displace substantial numbers of people or housing, induce substantial unplanned population growth, or result in low-income employment opportunities that could generate demand for low-income housing. As described in the “Approach to the Environmental Analysis” section, the following assessment of impacts is based on the characterization of existing environmental conditions and the regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments received on the notice of preparation included concerns regarding affordable housing, adequate workforce housing, and consistency with the County’s Regional Housing Needs Assessment (RHNA). These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

4.14.1 Background Report Setting Updates

REGULATORY SETTING

In addition to the information provided in Chapter 2, “Demographics and Economics,” and Chapter 5, “Housing,” the Background Report (Appendix B), the following information is relevant to understanding and evaluating the potential population, employment, and housing impacts of the 2040 General Plan.

Government Code Section 65863

Government Code Section 65863 requires that cities and counties ensure their housing elements make available sites for the remaining unmet share of regional housing needs. In addition, cities and counties are required to have no “net loss” of identified RHNA sites for lower and moderate-income dwelling units. Therefore, cities and counties may not take action that would reduce identified affordable housing sites for these income categories.

ENVIRONMENTAL SETTING

The Background Report (Appendix B) accurately describes the environmental setting for the purpose of this evaluation in Chapter 2, “Demographics and Economics,” and Chapter 5, “Housing.” There is no additional information necessary to understand the potential population, employment, and housing impacts of the 2040 General Plan.

4.14.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

The evaluation of potential impacts related to population and housing is based on information obtained from review of Chapter 2, “Demographics and Economics,” and Chapter 5, “Housing,” in the Background Report and available population, employment, and housing data and projections from the California Department of Finance. This evaluation includes review of the existing number of dwelling units, projected demand for housing units based on regional growth estimates, and whether any housing units, including affordable housing units would be eliminated or displaced under the 2040 General Plan. Affordable housing units are defined as moderate-income in the Coastal Zone and lower-income for the remainder of the plan area. (Lower-income is the term used to collectively refer to low-, very-low, and extremely-low income households.) Existing and future land uses were also evaluated to determine whether substantial unplanned population growth or displacement of a substantial number of people would occur. For purposes of analysis, substantial population growth is defined as growth exceeding the Southern California Association of Governments (SCAG) population projections for the county. Substantial displacement would occur if allowed land uses would displace more residences than would be accommodated through growth accommodated by the 2040 General Plan. In determining the level of significance, this analysis assumes that the 2040 General Plan would comply with the Guidelines for Orderly Development, greenbelt agreements, and the Save Open Space & Agricultural Resources (SOAR) measures for Ventura County’s unincorporated areas and eight cities.

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on the County of Ventura’s adopted Initial Study Assessment Guidelines (ISAG), which include threshold criteria to assist in the evaluation of significant impacts. Appendix G of the State CEQA Guidelines (“Appendix G”) also provides considerations for determining the significance of a project’s impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the Draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to consider the programmatic nature of a plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, ISAG Section 26, threshold 1, which evaluates the potential for elimination of affordable housing units has been combined with Appendix G question XIV(b) regarding displacement of substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere. ISAG Section 26, threshold 2, has been revised to delete references to project-specific and cumulative impacts related to providing adequate low-income housing for low-income employment opportunities. In addition, Appendix G question XIV(a), which evaluates whether a project would induce substantial unplanned population growth, is not addressed by ISAG thresholds. Therefore, this question has been added as a separate threshold below.

For the purpose of this Draft EIR, implementation of the 2040 General plan would have a significant population and housing impact if it would:

- ▶ Eliminate three or more affordable housing units (defined as moderate-income in the Coastal Zone, lower-income for the remainder of the plan area), or otherwise displace substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere.
- ▶ Induce substantial unplanned population growth either directly or indirectly.
- ▶ Result in low-income employment opportunities that could generate demand for new housing that exceeds the County's inventory of land to develop low-income housing.

ISSUES NOT DISCUSSED FURTHER

The Area Plans for communities of El Rio/Del Norte, Lake Sherwood/Hidden Valley, North Ventura Avenue, Oak Park, Ojai Valley, Piru, and Thousand Oaks were reviewed for policies and implementation programs specific to these Area Plans that would potentially have impacts on the environment with respect to population and housing. The 2040 General Plan would not result in substantive changes to Area Plan policies and implementation programs related to population and housing. The Area Plan policies and implementation programs related to these issues are consistent with the 2040 General Plan policies and implementation programs, which are addressed in the following impact discussions. Therefore, the environmental effects of the Area Plan policies and implementation programs are not addressed separately in this section.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to population and housing and, specifically, the thresholds of significance identified above, include the following:

Land Use and Community Character Element

- ▶ **Policy LU-1.1: Guidelines for Orderly Development.** The County shall continue to promote orderly and compact development by:
 - working with cities in Ventura County and the Ventura Local Agency Formation Commission (LAFCO) to promote and maintain reasonable city boundaries and Spheres of Influence to prevent growth-inducing urban development in unincorporated areas, and
 - require unincorporated urban development to be located in areas designated as Existing Communities and unincorporated urban centers consistent with the Guidelines for Orderly Development and as defined in Policy LU-1.2. (RDR, IGC) *[Source: Existing GPP Goal 3.1.1.2 and Goal 3.1.1.5, modified]*
- ▶ **Policy LU-1.3: Regional Housing Needs Allocations.** The County shall coordinate with Southern California Association of Governments (SCAG) to direct state regional housing needs allocations predominantly to cities to ensure consistency with the County's Save Open Space & Agricultural Resources (SOAR) initiative and the SCAG's Sustainable Communities Strategy. (RDR, IGC) *[Source: New Policy]*

- ▶ **Policy LU-1.6: Accommodating Future Growth.** The County shall ensure that the General Plan designates adequate land for urban development to accommodate projected population and employment growth in the unincorporated areas as determined by the Board of Supervisors. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-3.1: Existing Community(ies).** The Existing Community area designation, referred to in SOAR, identifies existing urban residential, commercial, or industrial enclaves outside of incorporated areas and unincorporated urban centers. The Existing Community area designation recognizes existing land uses in unincorporated areas which have been developed with urban building intensities and urban land uses, contains these enclaves within specific areas so as to prevent further expansion, and limits the building intensity and land use to previously established levels. Thomas Aquinas College is newly designated in this initiative as Existing Community, with the intention that it be confined to its current boundaries with the understanding that it may continue to intensify its building for its educationally related purposes. Figure 2-1 indicates the boundary of the Existing Community area designation. All areas inside these boundaries are considered within the Existing Community area designation for purposes of this General Plan and implementation of the Guidelines for Orderly Development and Save Open Space & Agricultural Resources (SOAR) initiative. This term is considered synonymous with “Urban Enclave” as used in other planning documents. (RDR, MPSP) *[Source: Existing GPP Policy 3.2 Land Use Designations, modified. SOAR]*
- ▶ **Policy LU-4.5: Jobs-Housing Balance.** The County shall evaluate employment generating discretionary development resulting in 30 or more new full-time and full-time-equivalent employees to assess the project’s impact on lower-income housing demand within the community in which the project is located or within a 15-minute commute distance of the project. At such time as the Housing Impact Mitigation Fee Program is completed, this policy shall no longer apply. (RDR) *[Source: Existing GPP Goal 3.4.2.9, modified]*
- ▶ **Policy LU-8.5: Farmworker Housing.** The County shall support the development of safe and quality farmworker housing that facilitates a reliable labor force and promotes efficient agricultural operations. Housing units shall include a variety of housing types, including group quarters and larger dwelling units that can accommodate a family. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-10.1: Accessory Dwelling Units.** The County shall permit accessory dwelling units as provided for in the Non-Coastal and Coastal Zoning Ordinances, even if such a dwelling would result in a density greater than the standard density specified for the residential land use designations. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-10.2: Density Exceptions – Residential Land Use Designation.** The County shall exclude from the Residential land use maximum density farmworker dwellings, and accessory dwelling units pursuant to section 65852.2 of the Government Code. (RDR) *[Source: Existing GPP Figure 3.4 General Residential Building Intensity Standards/Population Density Range Table, Footnote No. 2, Modified]*

- ▶ **Policy LU-10.3: Maximum Lot Coverage Nonconforming Lots - Residential Land Use Designations.** The County shall ensure that the maximum lot coverage for lots of less than one acre (nonconforming) in area shall be as specified for the Residential designation, or 2,500 square feet plus 1 square foot for each 4,596 square feet of lot area over 5,000 square feet, whichever is greater. *[Source: Existing GPP Figures 3.7a through 3.28b, Existing Community Building Intensity/Population Density Tables, Footnote No. 1, Modified]*
- ▶ **Policy LU-10.4: Range of Housing Choices.** The County shall facilitate the creation of a variety of housing types that meet the needs of all residents. (RDR) *[Source: New Policy]*
- ▶ **Policy LU-15.9: Area Plan Impacts on Jobs/Housing Balance.** The County shall require that as Area Plans are prepared or updated, planned industrial and commercial areas shall be evaluated to assess the impact on jobs/housing balance within the community and region. (RDR) *[Source: Existing GPP Policy 3.4.2.8]*

Implementation Programs

- ▶ **Implementation Program B: General Plan Consistency.** The County shall review and amend, as necessary, applicable ordinances and regulations to ensure consistency with the General Plan, including the Zoning Ordinances and Building Code. *[Source: New Program]*
- ▶ **Implementation Program C: Expansion of Allowed Housing Types.** The County shall research existing regulatory impediments to the creation of new housing types that have the potential to fulfill unmet housing needs (e.g., tiny homes, co-housing developments) and if necessary, shall amend applicable ordinances to allow for their development. *[Source: New Program]*

Economic Vitality Element

- ▶ **Policy EV-1.3: Housing Affordability.** The County shall continue to work with cities and community organizations to implement best practices, pursue funding, and implement programs that reduce the cost of housing to retain and attract employers and employees. (MPSP, IGC) *[Source: VCEVSP Policy F.1, modified]*

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.14-1: Eliminate Three or More Existing Affordable Housing Units or Displace Substantial Numbers of People or Housing Units

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

As discussed in Table 3-3 in Chapter 3, “Project Description,” the unincorporated county is projected to reach 101,832 residents, and 33,472 housing units by 2040; the 2040 General Plan would primarily direct this growth to areas in the Existing Community area designation. While housing or people could be displaced if redevelopment of an existing residential area occurred within the plan area, in the unlikely event that housing units were removed, it would not likely be a substantial number of units and it would be replaced with housing consistent with the residential land use designation of that area. The additional 1,281 housing units that would be accommodated under the 2040 General Plan would more than offset any minimal displacement of any existing housing units that could possibly be displaced in existing communities. In addition, in accordance with Government Code Section 65863, no affordable housing units would be displaced or removed.

State law requires that every jurisdiction prepares a housing element as part of its general plan. The California Department of Housing and Community Development determines the number of new housing units a region is projected to need at all income levels (very low-, low-, moderate, and above-moderate income) over the course of the housing element planning period to accommodate population growth and overcome existing deficiencies in the housing supply. This number is called RHNA. SCAG, which is the local Council of Government, then assigns a share of the RHNA to every city and county in the region based on a variety of factors. In preparing the housing element, the County must show how it plans to accommodate its share of the RHNA. The housing element must include an inventory of the sites already zoned for housing. If a community does not have enough sites within its existing inventory of residentially zoned land to accommodate its entire RHNA, then the community must adopt a program to rezone land.

To meet the lower-income portion of the RHNA (i.e., low-income, very-low income, and extremely low), the County can assume that land zoned with a density of at least 20 dwelling units per acre qualifies as suitable for development of housing affordable to lower-income households (Government Code, Section 65583.2(c)(3)(B)).

Further, the County can address a portion of its RHNA through the provision of accessory dwelling units (ADUs). As of 2018, the County permits ADUs on most lots that allow for residential development, including Open Space and Agricultural Exclusive zoned lots. ADUs are a valuable housing type that can facilitate affordability for a variety of housing needs. The 2040 General Plan also includes Policy LU-10.1 that states the County shall permit accessory dwelling units as provided for in the Non-Coastal and Coastal Zoning Ordinance even if such a dwelling would result in a density greater than the standard density specified for the residential land use designations. Farmworker housing is another source of lower-income housing that contributes to the County's lower-income housing needs. Policy LU-8.5 states that the County shall support the development of safe and quality farmworker housing.

The RHNA numbers for the 2014-2021 County of Ventura Housing Element are shown below in Table 4.14-1. A total of 1,015 units were allocated to unincorporated county. The California Department of Housing and Community Development certified the current County Housing Element on December 2013, which means that the Housing Element provided sufficient evidence of adequate capacity to meet the current RHNA allocation for housing at all income levels.

Table 4.14-1 2014-2021 RHNA for the Unincorporated County

Income Category	RHNA Allocation (DUs)
Extremely Low (<30% median)	123
Very Low (>30%-<50% median)	123
Low (>50%-<80% median)	168
Moderate (>80%-<120% median)	189
Upper (>120% median)	412
Totals	1,015

Source: Background Report (Appendix B)

The next cycle of housing element updates for cities and counties within the SCAG area will cover the planning period from 2021 to 2029. Identifying sufficient sites for this next cycle will be a challenge since a package of state laws, which passed in 2017 and went into effect in 2018, has made it more difficult to meet lower income inventory site requirements. Due to these new laws, a majority of the inventory sites identified for lower income housing in the current housing element will not be eligible to be reused in the upcoming housing element. It is anticipated that the County will have to identify additional land that would meet state standards for lower-income inventory site requirements, thus adding more opportunities for affordable housing.

Furthermore, the 2040 General Plan includes policies and programs to ensure future development within the plan area is consistent with the RHNA and can be accommodated by the land allocated to residential development. Policy LU-1.3 states the County shall coordinate with SCAG to direct state regional housing needs allocations, and Policy LU-1.6 would ensure that the 2040 General Plan designates adequate land for urban development to accommodate projected population and employment growth in the unincorporated areas. By coordinating with SCAG and ensuring adequate land for urban development, future development under the 2040 General Plan would be directed to designated areas and would not displace existing people or housing.

Policy LU-1.1 states the County shall continue to promote orderly and compact development, and Policy LU-3.1 further states that the Existing Community area designation, referred to in the SOAR initiative, identifies existing urban residential, commercial, or industrial enclaves outside of incorporated areas and unincorporated urban centers. The Existing Community area designation recognizes existing land uses in unincorporated areas that have been developed with urban building intensities and urban land uses, contains these enclaves within specific areas to prevent further expansion, and limits the building intensity and land use to previously established levels. Section 3.4.2 of the Piru Area Plan includes a policy that requires residential development within the Piru expansion area, but outside the Redevelopment area will ensure that 10.5 percent of the units will be maintained as affordable to low-income families. In addition, Section 3.3.2 of the Thousand Oaks Area Plan includes policies for providing bonuses to developers for qualified affordable housing developments, and requiring development permits involving 20 or more dwelling units to provide a variety of housing densities to meet the needs of diverse family income levels.

Therefore, implementation of the policies and programs in the 2040 General Plan and compliance with applicable regulations would ensure that future development could be accommodated within the plan area. The County has planned for future growth in areas near existing communities. While some housing could be displaced through development of areas near existing communities, these areas either would continue to be under residential land use designations or would add new residential areas (e.g., replace non-residential land uses) within the plan area such that a net gain in residential capacity would be achieved. Further, as has been past practice in the county, the County would continue to engage with SCAG through each RHNA planning cycle to ensure adequate land is available to meet its RHNA obligations. Overall, substantial numbers of people or housing, including affordable housing, would not be displaced through implementation of the 2040 General Plan. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.14-2: Induce Substantial Unplanned Population Growth

The existing population of unincorporated Ventura County (as of 2019) is 96,377. Growth projections employed in the preparation of the 2040 General Plan were estimated for 2020, 2030, and 2040 using county-specific demographic projections prepared by SCAG as described in Chapter 3, "Project Description." SCAG projections for Ventura County show a projected population of 101,832 residents by 2040. Although the 2040 General Plan is based upon the assumption that the unincorporated county will reach this projected population, it does not directly promote the growth of the county's population to that level. Moreover, and the rate of growth between 2019 and 2040, if a total population of 101,832 is to be reached, is a modest 0.4 percent per year.

This growth would be expected to occur without implementation of the 2040 General Plan. The philosophy of the 2040 General Plan is that the County would be prepared and able to accommodate projected growth, while adhering to policies that define where and how development would occur. The 2040 General Plan provides guidance in determining the appropriate or desirable locations for this growth, thereby preventing an unnecessarily scattered dispersed pattern of development, which often results in extraordinary demands on public services, above average public service costs, and unnecessary and avoidable destruction or degradation of valuable natural resources.

Section 2.1 of the Land Use and Community Character Element states that the County is dedicated to directing urban development to cities and existing unincorporated communities to preserve its working and rural landscapes, agricultural lands, scenic vistas, natural resources, and recreational opportunities. The 2040 General Plan would not make changes to the agricultural, open space, or rural land use designations located outside of Existing Community and Urban designated areas (consistent with the SOAR initiative). SOAR measures within cities establish voter-controlled urban growth boundaries, known as City Urban Restriction Boundaries. The County's SOAR measure, which is included as Appendix C and incorporated by reference into the 2040 General Plan, generally requires voter approval to re-designate land with Open Space, Agricultural, or Rural general plan land use designations, and to amend the goals and policies for these land use designations.

Policies and programs within the 2040 General Plan do not promote unplanned growth, but rather direct where and how projected growth within the unincorporated county is expected to occur. For example, Policy LU-1.1 states that the County shall promote orderly growth, and Policy LU-1.6 states that the County shall ensure that the General Plan designates adequate land for urban development to accommodate projected population and employment growth in the unincorporated areas. Policy LU-1.3 ensures that the County will coordinate with SCAG to direct state regional housing needs allocations predominantly to cities to ensure consistency with the County's SOAR initiative and the SCAG's Sustainable Communities Strategy. All of these policies are focused on managing and planning for the location of projected future growth within the county and maximizing efficient development patterns.

For additional discussion of population and economic growth, and analysis of the potential for the 2040 General Plan to remove obstacles to growth, refer to Chapter 7, "Other CEQA Considerations." Furthermore, the physical environmental impacts associated with the growth that would be accommodated by the 2040 General Plan have been analyzed and disclosed throughout Chapter 4 of this Draft EIR. The 2040 General Plan would not induce substantial unplanned population growth beyond the projections prepared by SCAG. Therefore, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.14-3: Result in Low-Income Employment Opportunities that could Generate Demand for New Housing that Exceeds the County's Inventory of Land to Develop Low-Income Housing

Employment opportunities within the unincorporated county are expected to increase in the future, including low-income employment opportunities. The Economic Vitality Element of the 2040 General Plan contains policies and programs that aim to retain and expand existing economic sectors, to help diversify the economy by developing new kinds of businesses, and to help improve economic resiliency. Ventura County's economy is diverse, offering specific strengths in agriculture, manufacturing, health care, retail trade, hospitality, and public administration. These industries are where Ventura County has large concentrations of employment. However, economic growth and the distribution of economic benefits have not kept pace with other areas in the Southern California region or state. County economic activity totaled more than \$70 billion in 2014, but this represented a decline in real dollar terms since 2007, during a period in which the state economy grew 10.1 percent.

While an increase in employment opportunities within the plan area is expected during the 2040 planning horizon, the county has adequate capacity to meet the current RHNA allocation for housing in all household income categories. In addition, policies and programs within the 2040 General Plan would ensure that housing needs, including future housing needs for the projected increase in low-income employment would be met. For example, Policy EV-1.3 states the County shall continue to work with cities and community organizations to implement best practices, pursue funding, and implement programs that reduce the cost of housing to retain and attract employers and employees. Policy LU-4.5 requires the County to evaluate employment generating discretionary development resulting in 30 or more new full-time and full-time-equivalent employees to assess the project's impact on lower-income housing demand within the community in which the project is located or within a 15-minute commute distance of the project. Furthermore, Policy LU-1.6 would ensure that the general plan designates adequate land for urban development to accommodate projected population and employment growth in the unincorporated areas, and Policy 8.5 states that the County shall support the development of safe and quality farmworker housing that facilitates a reliable labor force and promotes efficient agricultural operations. Article 16 of the Ventura County Non-Coastal Zoning Ordinance also includes provisions for the minimum required density of affordable housing. As further discussed in Impact 4.14-1, the 2040 General Plan would not displace or eliminate substantial numbers of any housing, including affordable housing.

Therefore, because the 2040 General Plan includes policies and programs to ensure adequate low-income housing for projected increases in low-income employment opportunities through the planning horizon, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

4.15 PUBLIC SERVICES AND RECREATION

This section evaluates the potential effects of implementing the 2040 General Plan on public services and recreational facilities, including law enforcement, fire protection, emergency services, schools, libraries, and parks and recreation. As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

One letter received in response to the notice of preparation provided comments on public services. This letter, from the City of Santa Paula, provides information regarding law enforcement, fire protection, and recreation facilities provided by the City, and comments on the need for cooperative planning for emergency services, recreation, and fire protection services. These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

4.15.1 Background Report Setting Updates

REGULATORY SETTING

The Background Report (Appendix B) accurately describes the regulatory setting for the purpose of this evaluation in Chapter 7, “Public Facilities, Services, and Infrastructure.” There is no additional information necessary to understand potential impacts on public services and recreation related to the 2040 General Plan. Specifically, this section of the draft EIR is based on the regulations provided in Section 7.5, “Law Enforcement,” Section 7.6, “Fire Protection,” Section 7.7, “Emergency Services,” Section 7.9, “Schools and Child Care,” Section 7.10, “Library Services,” and Section 7.11, “Parks and Recreation Services.”

ENVIRONMENTAL SETTING

The Background Report (Appendix B) accurately describes the environmental setting for the purpose of this evaluation in Chapter 7, “Public Facilities, Services, and Infrastructure.” There is no additional information necessary to understand the potential impacts on public services and recreation related to the 2040 General Plan. Specifically, this section of the EIR is based on the environmental setting provided in Section 7.5, “Law Enforcement,” Section 7.6, “Fire Protection,” Section 7.7, “Emergency Services,” Section 7.9, “Schools and Child Care,” Section 7.10, “Library Services,” and Section 7.11, “Parks and Recreation Services.”

4.15.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

This program-level analysis evaluates impacts on public services and recreation based on the potential for future development under the 2040 General Plan to create increased demands for public services and recreational facilities, which could result in the provision of new or physically altered facilities to maintain service ratios, response times, or other performance objectives, the construction of which could cause significant environmental impacts. Public services and recreational facilities evaluated in this section include law enforcement and emergency services, fire protection services, schools, libraries, and parks and recreation. The goals and policies of the 2040 General Plan were reviewed with respect to measures that would provide for oversight and approvals of the expansion of public services by the appropriate agency, promote actions that ensure the continued provision of adequate public services, and avoid or substantially lessen potential environmental impacts when the provision of new or physically altered facilities is required in response to increased demand. This analysis incorporates the principals of the methodology applied in the Initial Study Assessment Guidelines (ISAG), as discussed in detail below.

Law Enforcement and Emergency Services

The ISAG law enforcement threshold criterion lists categories of land uses that have the potential to increase demand for law enforcement or emergency services. The criterion also lists security measures needed to address potential increases in criminal activity (e.g., security lighting, window and door locks, defensible space) and concludes that projects that incorporate adequate security measures would have a less than significant impact on law enforcement and emergency services. However, at the general plan level project-specific security measures are not known. Future growth demands, especially high-density development or development that would be located far from existing developed areas, may increase demand for law enforcement services to a degree that new or physically altered law enforcement facilities would be required, even if future development includes adequate security measures. Therefore, the 2040 General Plan is evaluated with respect to goals and policies that address the provision of security measures for new or expanded development in the unincorporated county, and with respect to the potential need for additional law enforcement services as a result of growth.

Fire Protection Services

Under the ISAG, the determination of whether a project would have a significant environmental impact on fire protection services is based on the project's distance to a full-time fire station and corresponding response times. Additionally, equipment and facility concerns become significant when the magnitude of a project or the distance from existing facilities requires that a new facility or additional equipment be provided to serve the project. At the general plan level, the land use type and population density of future development would be factors in determining the impact on fire protection services. Large developments, high-density developments, or projects that are far from existing developed areas would be more likely to require expanded or new fire protection facilities.

Education - Schools

The ISAG methodology is specific to determining whether a project would interfere with an operating school or result in additional demand for school services. With respect to school enrollment, ISAG Section 34a notes that the development fees authorized by Senate Bill 50 are deemed to be “full and complete school facilities mitigation” pursuant to Section 65996 of the California Government Code. Therefore, the increase in student enrollment because of new development is not addressed further in this section. Rather, this analysis considers whether forecasted population growth over the life of the 2040 General Plan would result in development that could generate the need for new or expanded school facilities, the construction of which would result in substantial significant environmental impacts.

Education - Public Libraries

The ISAG states a project would have a significant project-specific impact on public library facilities and services if it would substantially interfere with the operations of an existing public library facility or put additional demands on a public library facility that is currently deemed overcrowded. Large developments or high-density developments would be more likely to cause overcrowding and create demand for new facilities, the construction of which could result in significant environmental impacts. Projects that are located outside of existing developed areas would be more likely to require expanded or new library facilities.

Recreational Facilities

A project would have a significant impact on recreation if it would cause an increase in the demand for recreation, parks, and/or trails and corridors or would cause a decrease in recreation, parks, and/or trails or corridors when measured against the ISAG standards. The ISAG standards for measuring impacts on recreational facilities are the provision of 5 acres per 1,000 population for local and regional parks and facilities and 2.5 miles per 1,000 population for regional trails and corridors. The standards also state that a project would have a significant impact on recreation if it would impede future development of recreation parks and facilities, or regional trails and corridors.

As with other public services, future residential development that would accommodate forecasted population growth would increase demand for parks and recreation facilities, which in turn could result in significant impacts.

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on the County’s adopted ISAG, which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project’s impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, the following thresholds were developed from the ISAG by deriving the performance objectives that could generate an effect on provision of public services and recreational facilities. Additionally, the potential for environmental impacts to result from actions needed to maintain acceptable service ratios was evaluated by expanding the thresholds to include the consideration of substantial adverse physical impacts associated with the provision of new or physically altered public facilities and recreational facilities in Appendix G questions XV.a and XVI.b.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant public services and recreation impact if it would:

- ▶ Result in development that would not include adequate security measures to address increased demand for law enforcement or emergency services such that there could be substantial adverse physical impacts associated with the provision of new or physically altered facilities;
 - Categories of projects that have the potential to increase demand for law enforcement or emergency services include: agricultural uses, amusement, recreation, and sport facilities, automobile impound yards, banks and financial institutions, bars, taverns and nightclubs, boarding houses and bed-and-breakfast inns, bus and train terminals, care facilities, cemeteries, clubhouses, conference centers/convention centers, dwellings, educational institutions, temporary events, government building, health services, including clinics, hotels, motels, hospitals, laboratories (research and scientific), libraries, manufacturing, ministorage, parking facilities, projects with walls or fences susceptible to graffiti, rental and leasing of durable goods, retail trade, and salvage yards.
 - Security measures considered adequate include: nighttime security lighting, cameras, alarms, fencing, window and door locks, private security patrols or special event security assistance, treatment of vulnerable surfaces with anti-graffiti coating or landscaping, removal of graffiti within a specified time period and/or other design measure to create defensible space.
- ▶ Result in development located in excess of 5 miles from a full-time paid fire department (distance measured from the apron of the fire station to the structure or pad of a proposed structure) or result in response times in excess of 12 minutes such that there could be substantial adverse physical impacts associated with the provision of new or physically-altered facilities.
- ▶ Require new fire prevention/suppression facilities or additional equipment as a result of the project magnitude or distance from existing facilities such that there could be substantial adverse physical impacts associated with the provision of new or physically altered facilities.
- ▶ Result in development that would substantially interfere with the operations of an existing school facility such that there could be substantial adverse physical impacts associated with the provision of new or physically altered facilities.
- ▶ Result in development that would generate the need for new or expanded school facilities, the construction of which would result in substantial significant environmental impacts.

- ▶ Result in development that would substantially interfere with the operations of an existing public library facility, put additional demands on a public library facility which is currently deemed overcrowded, or limit the ability of individuals to access public library facilities by private vehicle or alternative transportation modes such that there could be substantial adverse physical impacts associated with the provision of new or physically-altered facilities.
- ▶ Result in development that would cause an increase in the demand for recreational facilities, parks, and/or trails and corridors, or that would cause a decrease in recreation, parks, and/or trails or corridors, such that there could be substantial adverse physical impacts associated with the provision of new or physically-altered facilities, when measured against the following standards:
 - Local Parks/Facilities – 5 acres of developable land (less than 15-percent slope) per 1,000 population,
 - Regional Parks/Facilities – 5 acres of developable land per 1,000 population, and
 - Regional Trails/Corridors – 2.5 miles per 1,000 population.

ISSUES NOT DISCUSSED FURTHER

The ISAG threshold criterion for Education - Schools addresses potential project interference with operations of an existing school. The 2040 General Plan provides for orderly growth and future development, which would be concentrated within the Existing Community area designation (boundary) and Urban area designation (boundary). The proposed land use diagram geographically defines the nature of the future development that could occur over the life of the general plan. This type of programmatic land use planning would reduce the potential for interference with school operations.

With respect to school enrollment, ISAG Section 34a notes that the development fees authorized by Senate Bill 50 are deemed to be “full and complete school facilities mitigation” pursuant to Section 65996 of the California Government Code. These provisions would remain in place so long as subsequent State bonds are approved and available. The requisite school fees would be collected before issuance of building permits, which would ensure that potential impacts remain less than significant. Therefore, this topic is not addressed further in this section.

The Area Plans for communities of El Rio/Del Norte, Lake Sherwood/Hidden Valley, North Ventura Avenue, Oak Park, Ojai Valley, Piru, and Thousand Oaks were reviewed for policies and implementation programs specific to these Area Plans that would potentially have impacts on the environment with respect to public services and recreation. The 2040 General Plan would not result in substantive changes to Area Plan goals and policies related to law enforcement and emergency services, fire protection, libraries, schools, and parks and recreation facilities. The Area Plan policies and implementation programs related to these issues are consistent with the 2040 General Plan policies and implementation programs, which are addressed in the following discussions. Therefore, the environmental effects of the Area Plan goals and policies are not addressed separately in this section.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to public services and recreation and, specifically, the thresholds of significance identified above, include the following:

Land Use and Community Character Element

- ▶ **Policy LU-1.1: Guidelines for Orderly Development.** The County shall continue to promote orderly and compact development by:
 - working with cities in Ventura County and the Ventura Local Agency Formation Commission (LAFCO) to promote and maintain reasonable city boundaries and Spheres of Influence to prevent growth-inducing urban development in unincorporated areas, and
 - require unincorporated urban development to be located in areas designated as Existing Communities and unincorporated urban centers consistent with the Guidelines for Orderly Development and as defined in Policy LU-1.2. (RDR, IGC) [Source: Existing GPP Goal 3.1.1.2 and Goal 3.1.1.5, modified]
- ▶ **Policy LU 12.1. Parks and Recreation Facilities.** The County shall support the development of parks and recreation facilities within areas designated as Existing Community, Area Plans or Areas of Interest.

Public Facilities, Services, and Infrastructure Element

- ▶ **Policy PFS-9.1: Library Programs, Services, and Resources.** The County shall continue to provide access to library facilities and services throughout the county. Library programs, services, and resources shall be periodically evaluated to identify opportunities to expand vocational training, literacy, life skills, lifelong learning, health, and wellness programs. (SO) [Source: New Policy]
- ▶ **Policy PFS 9.5: Library Facilities as Part of Affordable Housing Projects.** The County shall consider opportunities to partner with affordable housing developers to leverage development or renovation of community library facilities as part of the housing development strategy. (IGC, JP, FB) [Source: New Policy]
- ▶ **Policy PFS-10.5: Parkland Dedication Requirement.** The County shall require discretionary development to provide new trails and/or parkland dedication, or equivalent in-lieu fees, based on a standard of five acres of local parkland per thousand population in accordance with the Quimby Act (Gov. Code, § 66477) and County Quimby Ordinance (contained in Ventura County Subdivision Ordinance). Any lands dedicated to meeting this requirement shall be accessible to the general public. (SO, RDR) [Source: Existing GPP Policy 4.10.2.1, modified]
- ▶ **Policy PFS-10.6: Additional Lands for Recreation Use.** As part of subdivision development, the County shall encourage developers to set aside unused open space for active and passive recreational uses. (RDR) [Source: Existing GPP Policy 4.10.2.3, modified]
- ▶ **Policy PFS-10.7: Parkland Development, Operation, and Maintenance.** The County shall require discretionary projects to provide funding for development, operation, and maintenance of park facilities appropriate to serve the needs of the project. (SO, RDR) [Source: Existing GPP Goal 4.10.1.2, modified]

- ▶ **Policy PFS-10.8: Discretionary Development near Trails.** The County shall require discretionary development near existing trails to mitigate or avoid adverse impacts to the existing trail system. (RDR) *[Source: Existing Ojai Valley Policy 4.7.2.1, modified]*
- ▶ **Policy PFS-11.1: Emergency Response.** The County shall maintain adequate staffing, equipment, and facilities to provide timely and effective responses to emergencies. (FB, SO) *[Source: New Policy]*
- ▶ **Policy PFS-11.4: Emergency Vehicles Access.** The County shall require all discretionary development to provide, and existing development to maintain, adequate access for emergency vehicles, including two points of access for subdivisions and multifamily developments. (RDR) *[Source: Existing Oak Park Area Plan Goal 4.5.1.2, modified]*
- ▶ **Policy PFS-11.8: Avoidance of Surveillance Interference.** The County shall condition discretionary development to avoid landscaping which interferes with police surveillance (e.g., landscaping must not cover any exterior door or window, landscaping at entrances and exits or at any parking lot intersection must not block or screen the view of a seated driver from another moving vehicle or pedestrian, trees must not be placed underneath any overhead light fixture which would cause a loss of light at ground level). (RDR) *[Source: Existing GPP Policy 4.7.2.4, modified]*
- ▶ **PFS 12.2: Fire Station Locations.** The County shall work with the Fire Protection District to site fire stations in locations **Policy** central to the area served and on or near arterial highways to minimize call response time. (IGC) *[Source: Existing GPP Policy 4.8.2.2, modified]*
- ▶ **Policy PFS-12.3: Adequate Water Supply, Access, and Response Times for Firefighting Purposes.** The County shall prohibit discretionary development in areas that lack and cannot provide adequate water supplies, access, and response times for firefighting purposes. (RDR) *[Source: Existing GPP 4.8.2.1, modified and Existing Oak Park Area Plan Goal 4.5.1.2, modified]*
- ▶ **Policy PFS-12.4: Consistent Fire Protection Standards for New Development.** The County, in coordination with local water agencies and the Fire Protection District, shall require new discretionary development to comply with applicable standards for fire flows and fire protection. (RDR, IGC) *[Source: New Policy]*

Implementation Programs

- ▶ **Implementation Program N: Open Space Zone for Parks and Recreation.** The County shall amend the Non-Coastal Zoning Ordinance to create a new Open Space zone for public lands that will be limited to parks and recreational uses. *[Source: New Program]*
- ▶ **Implementation Program O: Crime Prevention Programs.** The County shall continue to support efforts to organize neighborhood, rural, and industrial crime prevention programs. *[Source Existing GPP Program 4.7.3.1, modified]*
- ▶ **Implementation Program P: Adequate Fire Flow.** The County shall work with mutual water districts/companies to identify and address the capabilities of each entity to provide adequate fire flows to address existing and potential development (including the anticipated growth of accessory dwelling units), within their service areas. *[Source: New Program]*

- ▶ **Implementation Program Q: Adequate Fire Flow.** The County shall continue to review all new development to ensure that an adequate level of water for fire flow and fire protection can be provided. *[Source Existing GPP Program 4.8.3.1, modified]*

Conservation and Open Space Element

- ▶ **Policy COS-2.7: Preserve Public Access.** The County shall work with federal, State, and local jurisdictions, agencies, and organizations to assess the vulnerability of public coastal access points and prioritize protection for those that provide the greatest benefits to residents and visitors. (PSR, IGC, JP) *[Source: New Policy, OPR Sea-Level Rise Guidance]*
- ▶ **Policy COS-9.2: Public Open Space.** The County shall explore possible resources for public acquisition of permanent open space for public use. (IGC, JP) *[Source: New Policy]*
- ▶ **Policy COS-9.3 Open Space Preservation.** The County shall place a high priority on preserving open space lands for recreation, habitat protection, wildlife movement, flood hazard management, public safety, water resource protection, and overall community benefit. (PSP) *[Source: New Policy]*

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

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

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells.

The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

According to the ISAG, land use types that require security measures (e.g., nighttime security lighting, cameras, alarms, fencing, window and door locks, private security patrols, or design measure to create defensible space) include most urban land uses, including Residential, Mixed Use, Commercial, and Industrial land uses. Because of the programmatic nature of the 2040 General Plan, it is unknown whether specific future projects would include these security measures. The 2040 General Plan does not directly require the provision of security measures associated with discretionary projects as described in the ISAG; however, the 2040 General Plan is consistent with the Guidelines for Orderly Development, which require unincorporated urban development to be located within areas of the county within Existing Community or Urban area designations (Policy LU-1.1). This would concentrate future development in areas with or close to existing public services, which minimizes the need for new or expanded law enforcement or emergency response facilities to serve new development. Policy PFS-11.8 would require that all development provide adequate access for emergency vehicles and maintain conditions necessary to allow adequate police surveillance. Implementation of Policy PFS-11.1 would ensure that adequate staffing, equipment, and facilities are available to provide timely and effective responses to emergencies, while Implementation Program O requires that the County continue to support efforts to organize neighborhood, rural, and industrial crime prevention programs.

Implementation of the 2040 General Plan could allow for future development that does not include the adequate provision of security measures, which could result in adverse effects to the environment due to the provision of new or expanded law enforcement and emergency services that would be needed as a result of inadequate security measures. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure PS-1: New Implementation Program PFS-X: Review Future Projects for Incorporation of Law Enforcement Security Measures and Emergency Services Access Need

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program PFS-X: Review Future Projects for Incorporation of Law Enforcement Security Measures

Future discretionary projects shall be reviewed by the County Sheriff's Department to determine whether the project includes adequate security measures and access so as not to exacerbate the need for new law enforcement/emergency services. Security measures considered adequate include but are not limited to: nighttime security lighting, cameras, alarms, fencing, window and door locks, private security patrols or special event security assistance, treatment of vulnerable surfaces with anti-graffiti coating or landscaping, removal of graffiti within a specified time period and/or other design measure to create defensible space.

Significance after Mitigation

With implementation of Mitigation Measure PS-1 future discretionary projects would be required to demonstrate the provision of adequate security measures prior to approval by the County. As a result, future development under the 2040 General Plan would not increase demand for new or expanded law enforcement and emergency vehicles as a result of inadequate provision of security measures. Therefore, this impact would be **less than significant**.

Impact 4.15-2: Require Expansion or Construction of New Facilities to Support Law Enforcement and Emergency Services

As noted in Section 7.5, “Law Enforcement,” of the Background Report (Appendix B), the County Sheriff employs 1,200 staff members, including 700 sworn positions. The Patrol Division operates seven patrol stations that serve the unincorporated areas of the county, as well as five contract cities. As estimated by SCAG (SCAG 2017), population growth would be approximately 4 percent between 2015 and 2040, resulting in 4,099 new residents (see Chapter 3, “Project Description”).

While the 2040 General Plan land use diagram and policies would concentrate future growth in the Existing Community and Urban area designations, the land use diagram also would provide for approximately 1,050 acres of land designated Low-Density Residential and approximately 7,572 acres of land designated Very Low-Density Residential. Future development of these land use types in these areas would generally be on the edges of existing urban development, which may increase response times for law enforcement and emergency services. The 2040 General Plan requires that the County provide adequate law enforcement and emergency services to county residents (Policy PFS-11.1), and future development, in particular on the edges or outside of existing developed areas, could result in the need for construction of new or expanded law enforcement and emergency response facilities in order to maintain adequate service ratios and other performance standards. The construction of new or expanded facilities could, in turn, result in adverse impacts on the environment, depending on the location of the new facilities.

The potential physical environmental impacts resulting from the construction of new or expanded law enforcement and emergency services facilities within the county are evaluated throughout this draft EIR within the programmatic scope of growth and future development accommodated by the 2040 General Plan. The physical environmental impacts that would result from development of new or expanded utility infrastructure are similar to the impacts of other types of future development that would be accommodated by the 2040 General Plan (e.g., air quality, noise, water quality). Each of these environmental impact areas have been evaluated throughout this draft EIR, and in some cases, these impacts would result in potentially significant impacts. Therefore, this impact would be **potentially significant**.

Mitigation Measures

The construction of new or expanded law enforcement and emergency services facilities could result in the types of potential adverse physical changes to the environment already evaluated and identified throughout this draft EIR. Where impacts are potentially significant, the draft EIR identifies potentially feasible mitigation measures to avoid or substantially lessen the impact. As a result, no additional mitigation measures are identified in this section to address the potentially significant impacts of constructing new or expanded law enforcement and emergency services facilities.

Significance after Mitigation

This draft EIR includes a programmatic evaluation of potential adverse physical changes to the environment as a result of forecasted growth and future development under the 2040 General Plan, which includes the construction of new or expanded law enforcement and emergency services facilities to serve this growth and development. These environmental impacts are analyzed in Sections 4.1 through 4.17 of this draft EIR. As discussed herein, future development would be subject to applicable laws and regulations, the policies and implementation programs in the 2040 General Plan, and mitigation measures identified throughout this draft EIR. The adverse physical impacts associated with construction of new or expanded law enforcement and emergency services facilities would be consistent with the impacts of the types of development evaluated in this draft EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases mitigation measures would reduce impacts to less than significant; in other cases impacts would remain significant and unavoidable after mitigation. Because not all potentially significant impacts of the 2040 General Plan can be reduced to less than significant, and some significant and unavoidable impacts would result, the impact of constructing new or expanded law enforcement and emergency services facilities in response to increased demand under the 2040 General Plan would be **significant and unavoidable**.

Impact 4.15-3: Require Expansion or Construction of New Fire Protection Facilities and Services as a Result of Excessive Response Times, Project Magnitude, or Distance from Existing Facilities

As noted in Section 7.6, “Fire Protection,” of the Background Report (Appendix B), the Ventura County Fire Department (VCFD) provides a range of programs and services aimed at protecting lives and property from the adverse effects of fires, sudden medical emergencies, exposure to hazardous materials, and other dangerous conditions. It provides a network of fire stations, personnel, and equipment, including 32 stations, 583 personnel, and a fleet of approximately 371 emergency and nonemergency vehicles.

As described above, the 2040 General Plan land use diagram and policies would concentrate future growth in the Existing Community and Urban area designations, the land use diagram also would provide for 1,050 acres of land designated Low-Density Residential and 7,572 acres of land designated Very Low-Density Residential. Future development of these land use types in these areas would generally be on the edges of existing urban development, which may increase response times for law fire protection services. Expansion or construction of new fire protection facilities and services may be required to maintain acceptable response times, depending upon the actual location and magnitude of future development under the 2040 General Plan.

The 2040 General Plan incorporates the Guidelines for Orderly Development, which require unincorporated urban development to be located within areas of the county within Existing Community or Urban area designations (Policy LU-1.2). The 2040 General Plan further contains policies that, when implemented, would maintain adequate staffing, equipment, and facilities to provide timely and effective responses to emergencies (Policy PFS-11.1) and would require all discretionary development to provide, and existing development to maintain, adequate access for emergency vehicles. Additionally, the 2040 General Plan encourages investment in facilities and infrastructure and services to ensure public safety and improve quality of life, and requires adequate emergency vehicle access in new discretionary development (Policy PFS-11.4).

However, as discussed above, these policies do not completely prohibit future development outside of these communities, and the land use designations established in the 2040 General Plan would allow for low intensity development throughout much of the county. Therefore, the 2040 General Plan could accommodate future development located in excess of 5 miles from a full-time paid fire department or result in response times in excess of 12 minutes. As a result, new or physically altered fire protection facilities could be required to adequately serve future development, the construction of which could result in substantial adverse physical impacts.

The potential physical environmental impacts resulting from the construction of new or expanded public facilities within the county are evaluated throughout this draft EIR within the programmatic scope of growth and future development accommodated by the 2040 General Plan. The physical environmental impacts that would result from development of new or expanded fire protection facilities are similar to the impacts of other types of future development that would be accommodated by the 2040 General Plan (e.g., air quality, noise, water quality). Each of these environmental impact areas have been evaluated throughout this draft EIR, and in some cases, these impacts would result in potentially significant impacts. Therefore, this impact would be **potentially significant**.

Mitigation Measures

The construction of new or expanded fire protection facilities could result in the types of potential adverse physical changes to the environment already evaluated and identified throughout this draft EIR. Where impacts are potentially significant, the draft EIR identifies potentially feasible mitigation measures to avoid or substantially lessen the impact. As a result, no additional mitigation measures are identified in this section to address the potentially significant impacts of constructing new or expanded fire protection facilities.

Significance after Mitigation

This draft EIR includes a programmatic evaluation of potential adverse physical changes to the environment as a result of forecasted growth and future development under the 2040 General Plan, which includes the construction of new or expanded fire protection facilities to serve this growth and development. These environmental impacts are analyzed in Sections 4.1 through 4.17 of this draft EIR. As discussed herein, future development would be subject to applicable laws and regulations, the policies and implementation programs in the 2040 General Plan, and mitigation measures identified throughout this draft EIR. The adverse physical impacts associated with construction of new or expanded fire protection facilities would be consistent with the impacts of the types of development evaluated in this draft EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases mitigation measures would reduce impacts to less than significant; in other cases impacts would remain significant and unavoidable after mitigation. Because not all potentially significant impacts of the 2040 General Plan can be reduced to less than significant, and some significant and unavoidable impacts would result, the impact of constructing new or expanded fire protection facilities in response to increased demand under the 2040 General Plan would be **significant and unavoidable**.

Impact 4.15-4: Require Expansion or Construction of New Public Libraries or Other Facilities to Meet New Demand or Address Overcrowding and Accessibility

As noted in Section 7.10, “Library Services,” of the Background Report (Appendix B), the County Library System provides services to all residents and serves unincorporated areas and cities, or areas within cities, that are neither served by a city library nor within the boundaries of an independent library district. It operates 12 library branches located in Oxnard, Fillmore, Piru, Oak Park, Ojai, Oak View, Port Hueneme, and Ventura.

As described in Impact 4.15-1, the 2040 General Plan would be consistent with the established Guidelines for Orderly Development, which require unincorporated urban development to be located within areas of the county within Existing Community or Urban area designations (Policy LU-1.1). However, the 2040 General Plan would allow for some low levels of future development, including 1,050 acres of land designated Low-Density Residential and 7,572 acres of land designated Very Low-Density Residential. Future development of these land use types in these areas would generally be on the edges of existing urban development, which may increase demand for library services.

Implementation of the 2040 General Plan would require that the County continue to provide access to library facilities and services throughout the county (Policies PFS-9.1 and PFS-9.5). Therefore, forecasted population growth that would be accommodated by future development under the 2040 General Plan could require expansion of existing facilities or construction of new facilities to meet increased demand or address overcrowding of adverse effects to accessibility. The construction of new or expanded library facilities could result in substantial adverse physical impacts. However, because of the programmatic nature of the general plan, project-specific impacts cannot be predicted at this time. It is possible that future development that could occur over the life of the 2040 General Plan could result in adverse effects to library and other facility impacts depending on their location.

The potential physical environmental impacts resulting from the construction of new or expanded public facilities within the county are evaluated throughout this draft EIR within the programmatic scope of growth and future development accommodated by the 2040 General Plan. The physical environmental impacts that would result from development of new or expanded library facilities are similar to the impacts of other types of future development that would be accommodated by the 2040 General Plan (e.g., air quality, noise, water quality). Each of these environmental impact areas have been evaluated throughout this draft EIR, and in some cases, these impacts would result in potentially significant impacts. Therefore, this impact would be **potentially significant**.

Mitigation Measures

The construction of new or expanded library facilities could result in the types of potential adverse physical changes to the environment already evaluated and identified throughout this draft EIR. Where impacts are potentially significant, the draft EIR identifies potentially feasible mitigation measures to avoid or substantially lessen the impact. As a result, no additional mitigation measures are identified in this section to address the potentially significant impacts of constructing new or expanded public facilities.

Significance after Mitigation

This draft EIR includes a programmatic evaluation of potential adverse physical changes to the environment as a result of forecasted growth and future development under the 2040 General Plan, which includes the construction of new or expanded library facilities to serve this growth and development. These environmental impacts are analyzed in Sections 4.1 through 4.17 of this draft EIR. As discussed herein, future development would be subject to applicable laws and regulations, the policies and implementation programs in the 2040 General Plan, and mitigation measures identified throughout this draft EIR. The adverse physical impacts associated with construction of new or expanded library facilities would be consistent with the impacts of the types of development evaluated in this draft EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases mitigation measures would reduce impacts to less than significant; in other cases impacts would remain significant and unavoidable after mitigation. Because not all potentially significant impacts of the 2040 General Plan can be reduced to less than significant, and some significant and unavoidable impacts would result, the impact of constructing new or expanded library facilities in response to increased demand under the 2040 General Plan would be **significant and unavoidable**.

Impact 4.15-5: Require Expansion or Construction of New Parks and Recreation Facilities and Services or Cause Substantial Physical Deterioration of Parks and Recreation Facilities Because of Overuse

As noted in Section 7.11, “Parks and Recreation Services,” of the Background Report (Appendix B), there are approximately 640,000 acres of open space in the county that are managed by federal, State, County, special district, local, and nonprofit agencies. A portion of these open spaces are accessible to the public and offer a variety of recreational opportunities in different settings. The County owns 5,321 acres of parks, open space, and golf courses; as well as 23.25 miles of trails. A variety of recreational opportunities are also provided through special districts like the Conejo, Pleasant Valley, and Rancho Simi Recreation and Parks Districts. However, distance to open space and access vary throughout the county. Some residents of the plan area do not have access to open space/park resources within walking distance (0.5 mile) of their residence.

As described in Impact 4.15-1, the 2040 General Plan would be consistent with the established Guidelines for Orderly Development, which require unincorporated urban development to be located within areas of the county within Existing Community or Urban area designations (Policy LU-1.1). In addition, the 2040 General Plan would allow for some low levels of future development, including 1,050 acres of land designated Low-Density Residential and 7,572 acres of land designated Very Low-Density Residential. Future development in these areas may be distant from existing parks and recreation facilities and may necessitate construction of new facilities.

The 2040 General Plan guides new urban growth to cities or parts of the plan area within the Existing Community area designation and encourages investment in facilities and infrastructure and services to improve quality of life. The 2040 General Plan includes the Guidelines for Orderly Development, which require unincorporated urban development to be located within areas of the county that are within the Existing Community or Urban area designation (Policy LU-1.1). The 2040 General Plan also requires the county to support development of parks and recreation facilities with areas designated as Existing Community, Area Plans, or Areas of Interest (Policy LU-12.1) and provides for the Parks and Recreation land use designation from the 2040 General Plan.

Implementation of the policies in the 2040 General Plan, described above, would require approved subdivisions not otherwise exempted under the County Subdivision Ordinance to provide new trails and/or parkland dedication, or equivalent in-lieu fees, based on a standard of 5 acres of local parkland per 1,000 population in accordance with the Quimby Act (Government Code, Section 66477) and County Quimby Ordinance. Any lands dedicated to meeting this requirement would be accessible to the general public. These policies apply to all Area Plans, and some Area Plans contain additional goals, policies, and/or programs to maintain adequate park and recreation facilities in these communities.

As described in Chapter 3, "Project Description," future development under the 2040 General Plan would accommodate forecasted population growth of 4,099 people between 2015 and 2040. The increase in population may result in physical deterioration of existing parks and recreation facilities if increased recreation demand results in overuse of parks and recreational facilities. Implementation of the 2040 General Plan Policies related to Parks in Recreation would require the expansion of existing park and recreation facilities or construction of new facilities in order to avoid physical deterioration from overuse and to maintain an acceptable ratio of parklands to population. The expansion of existing or the construction of new facilities in response to increased demand could result in adverse effects on the environment. The Ventura County Coastal Zoning Ordinance Section 8178-2.3, addressing development of recreational projects in Environmentally Sensitive Habitat Areas requires management programs to control the types, intensities, and locations of uses to preserve habitat resources to the maximum extent feasible. Compliance with this ordinance would lessen, but may not totally avoid, adverse effects of development.

The potential physical environmental impacts resulting from the construction of new or expanded public facilities within the county are evaluated throughout this draft EIR within the programmatic scope of growth and future development accommodated by the 2040 General Plan. The physical environmental impacts that would result from development of new or expanded parks and recreation facilities are similar to the impacts of other types of future development that would be accommodated by the 2040 General Plan (e.g., air quality, noise, water quality). Each of these environmental impact areas have been evaluated throughout this draft EIR, and in some cases, these impacts would result in potentially significant impacts. Therefore, this impact would be **potentially significant**.

Mitigation Measures

The construction of new or expanded parks and recreation facilities could result in the types of potential adverse physical changes to the environment already evaluated and identified throughout this draft EIR. Where impacts are potentially significant, the draft EIR identifies potentially feasible mitigation measures to avoid or substantially lessen the impact. As a result, no additional mitigation measures are identified in this section to address the potentially significant impacts of constructing new or expanded parks and recreation facilities.

Significance after Mitigation

This draft EIR includes a programmatic evaluation of potential adverse physical changes to the environment as a result of forecasted growth and future development under the 2040 General Plan, which includes the construction of new or expanded parks and recreation facilities to serve this growth and development. These environmental impacts are analyzed in Sections 4.1 through 4.17 of this draft EIR. As discussed herein, future development would be subject to applicable laws and regulations, the policies and implementation programs in the 2040 General Plan, and mitigation measures identified throughout this draft EIR.

The adverse physical impacts associated with construction of new or expanded parks and recreation facilities would be consistent with the impacts of the types of development evaluated in this draft EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases mitigation measures would reduce impacts to less than significant; in other cases impacts would remain significant and unavoidable after mitigation. Because not all potentially significant impacts of the 2040 General Plan can be reduced to less than significant, and some significant and unavoidable impacts would result, the impact of constructing new or expanded parks and recreation facilities in response to increased demand under the 2040 General Plan would be **significant and unavoidable**.

4.16 TRANSPORTATION AND TRAFFIC

This section evaluates the potential effects of implementing the 2040 General Plan on transportation and traffic, including vehicle miles traveled (VMT), safety, multimodal access, emergency access, rail operations, boat traffic, and pipeline circulation. As described in the “Approach to the Environmental Analysis” section,” the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

Comments on the notice of preparation (NOP) are also addressed as part of this draft EIR. Comments on the NOP included concerns regarding greenhouse gas emissions reductions; consistency with the Regional Transportation Plan/Sustainable Community Strategy; equitable mobility options for people who are economically, socially, or physically disadvantaged; balancing analysis of both level of service (LOS) and VMT; and the need to actively promote walking, bicycling, and transit as alternatives to driving and a strategy to reduce VMT and GHG emissions. These comments are addressed in this section, as appropriate. The NOP and comments on the NOP are included in Appendix A.

Relative to LOS analysis, Section 15064.3 was added to the State CEQA Guidelines effective December 28, 2018 as part of a comprehensive guidelines update and addresses the determination of significance for transportation impacts under CEQA. This section requires that transportation impact analysis be based on VMT instead of a congestion metric (such as LOS) and states that a project’s effect on automobile delay shall not constitute a significant environmental impact. Thus, LOS is not analyzed in this draft EIR.

4.16.1 Background Report Setting Updates

REGULATORY SETTING

In addition to the information provided in Chapter 6, “Transportation and Mobility,” of the Background Report (Appendix B), the following information is relevant to understanding the potential transportation impacts of the 2040 General Plan.

State

Senate Bill 743 - Transportation Impacts

Adopted in 2013, Senate Bill (SB) 743 changes how transportation impacts are evaluated under CEQA. Previously, CEQA analysis in the county was conducted using an LOS measurement that evaluated traffic delay. As specified under SB 743, and implemented under Section 15064.3 of the State CEQA Guidelines (effective December 28, 2018), VMT is the required metric to be used for identifying CEQA impacts and mitigation. In December 2018, OPR published a Technical Advisory on Evaluating Transportation Impacts, including guidance for VMT analysis. The Office of Administrative Law approved the updated CEQA Guidelines

and lead agencies were given until July 1, 2020 to implement the updated guidelines for VMT analysis.

VMT was chosen as the primary metric to better integrate land use and multimodal transportation choices, to encourage alternative transportation, promote greater efficiency, and reduce GHG emissions. The most recent technical guidance on analyzing the transportation impacts under CEQA, released by the Governor's Office of Research and Planning (OPR) in December of 2018, provides recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures. OPR offered a generalized recommendation of a 15 percent reduction below existing VMT as a threshold of CEQA significance. For the VMT analysis, OPR recommends using a trip-based assessment of VMT that captures the full extent of the vehicle trip length – even the portion that extends beyond the jurisdictional boundary (trips that extend into another county). This differs from the traditional boundary-based assessment of VMT impacts that quantifies only the length of the vehicle trips that occurs within the boundaries of a jurisdiction (only miles traveled within the Ventura County). Additionally, SB 743 also amended the State congestion management program statutes lifting the sunset clause for the designation of infill opportunity zones, where CMP LOS standards would no longer apply.

Assembly Bill 1266 - Traffic Control Devices: Bicycles (2019)

Assembly Bill (AB) 1266 requires the California Department of Transportation (Caltrans) to provide guidance on the ways in which to notify bicyclists that they are allowed to traverse straight through an intersection when a right-turn-only lane requires vehicles to turn. Caltrans will be required to develop standards on lane striping, regulatory signage, and pavement markings in these scenarios.

Assembly Bill 2615 - State Highway System: Parks and Recreation: Accessibility for Bicycles and Pedestrians (2018)

AB 2615 adds Section 133 to the Streets and Highways Code, relating to State highways. Existing law gives the Department of Transportation full possession and control of all State highways, including property within any portion of a State Park. The new section mandated by AB 1615 would require, where feasible and to the full extent possible, the Caltrans to coordinate with appropriate public agencies, including but not limited to the Department of Parks and Recreation, any federal department or agency, regional, local or public entity to develop plans and strategies to improve accessibility for bicyclists and pedestrians to federal, State, regional, and local parks connected to or adjacent to the State highway system.

Local Regulations

Ventura County Non-Coastal Zoning Ordinance

The following guidelines are included in the Ventura County Non-Coastal Zoning Ordinance and pertain to transportation and traffic.

- ▶ **Section 8108-4.8.1 – Reductions in Number of Motor Vehicle Parking Spaces Required.** Discusses an applicant's ability to reduce the minimum number of parking spaces required with a new development. This may be accomplished by an applicant-funded parking study, a Transportation Demand Management Plan, the provision of affordable or senior housing, as well as other means. The applicant's ability to fund and prepare a Transportation Demand Management Plan to reduce vehicle trips to the land use

could contribute to reduced VMT, encourage a shift to non-vehicular travel modes and support a more vibrant regional multimodal transportation network.

- ▶ **Sec. 8108-5 – Motor Vehicle Parking Design Standards; Sec. 8108-6 Bicycle Parking Design Standards; Sec. 8108-7 Drive-Through Facilities; and Sec. 8108-8 – Loading Areas.** These sections establish design standards to guide the development of safe parking and loading access for all modes and users.
- ▶ **Sec. 8109-0.7 – Transportation Demand and Trip Reduction Measures.** This section discusses the minimum requirements of the applicant prior to the approval of discretionary development as it relates to standards for transportation demand management and trip reduction measures. These standards provide an opportunity to reduce VMT and encourage mode shift to non-vehicular travel modes.
- ▶ **Article 6: Parking and Loading Requirements.** Article 6 discusses the requirements for the amount, location, and design of parking and loading access for motor vehicles and bicycles. Requirements and standards within this section intends to promote a balanced, safe, and accessible, and environmentally sound multimodal transportation network.
- ▶ **Article 12: Limitations on Issuance of Building Permits in the Ojai Valley to Protect Air Quality.** Restrictions on the development allowed to occur in this area places limitations on growth, the number of users and the number of vehicle trips on the County’s future road network within and beyond the Ojai Valley.

ENVIRONMENTAL SETTING

In addition to the information provided in Chapter 6, “Transportation and Mobility,” of the Background Report (Appendix B), the following information is relevant to understanding the potential transportation impacts of the 2040 General Plan.

Roadways and Functional Classifications

Figure 4.16-1 provides an update map of the roadway functional classifications in the unincorporated areas of Ventura County. This is an updated version of Figure 6-1 in the Background Report. Other information on roadway classifications can be found in Section 6.1 of the Background Report (Appendix B).

VMT Baseline Estimates

As stated earlier, OPR recommends the use of a trip-based based VMT analysis (includes miles traveled in other counties that start or end in Ventura County) over a boundary-based assessment that includes only the miles traveled inside of Ventura County. To develop a trip-based VMT analysis, this draft EIR estimated VMT that occurs within the county (boundary-based) and adds to this the additional VMT from trips that either begin or end in Ventura County that occurs outside the county to develop the full trip-based analysis.

Boundary-Based VMT

A VMT road inventory was provided in the Background Report based on information sourced from the Highway Performance Monitoring System (HPMS) using 2014 data. As part of the EIR analysis, this information was updated to the latest available, which is the 2016 HPMS (Caltrans 2017). The HPMS data source provided VMT for local and other unincorporated roadways.

The HPMS VMT estimates do not distinguish between incorporated versus unincorporated area VMT occurring on the State highway system of the county. To calculate the VMT associated with State highways within the unincorporated area, the 2017 Caltrans Post-Mile based State Highway Volume Report was used. This was computed by multiplying Average Daily Traffic (ADT) volumes for a given roadway segment by its segment length (VMT = volume x segment length). This calculation resulted in an unincorporated State highway baseline VMT estimate of 3,519,851. This was added to the HPMS VMT estimates for local and other unincorporated roadways to yield the total boundary-based unincorporated Ventura County VMT estimate of 4,936,831. Table 4.16-1 displays the boundary-based VMT estimates for the unincorporated county areas.

Table 4.16-1 2016 Ventura County Boundary-Based VMT Estimates

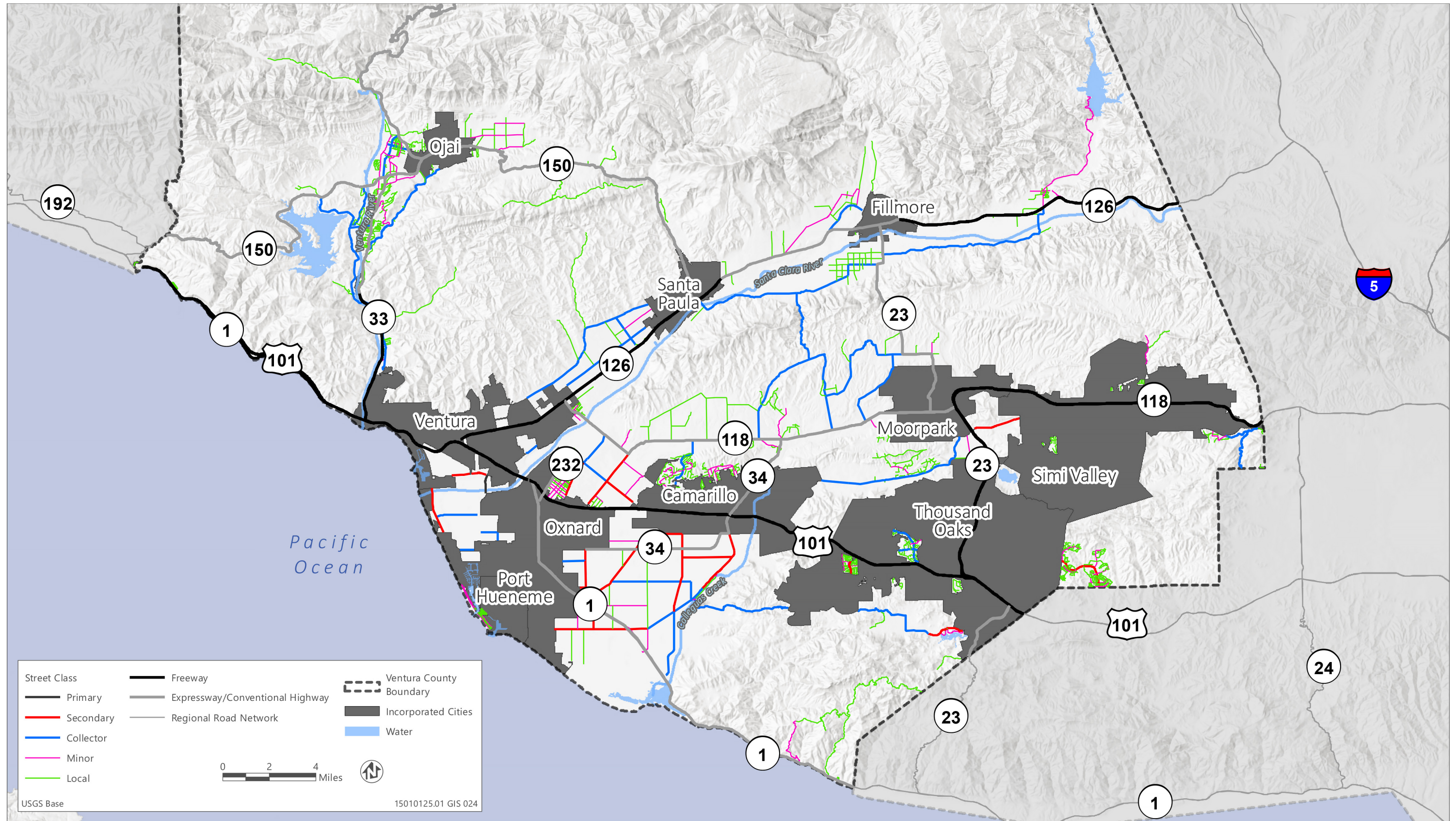
Trip Data Source	VMT
Total Countywide VMT (HPMS Boundary-based)	18,676,660
Unincorporated County Local Road VMT (HPMS Boundary-based)	1,394,030
Other Unincorporated VMT (HPMS Boundary-based)	22,950
Unincorporated County State Highway VMT (Caltrans ADT x SHS Miles)	3,519,851
Total Unincorporated VMT (HPMS Boundary-based)	4,936,831
Percent Unincorporated (4,936,831 / 18,676,660)	26.4%

Source: 2016 HPMS (Caltrans, 2017), GHD via 2017 Caltrans Volume Report

Trip-Based VMT

Pursuant to OPR guidance, trip-based VMT estimates are preferred over boundary-based VMT for evaluating transportation impacts and estimating greenhouse gas emissions from on-road mobile sources. To reflect the full length of interregional trips (i.e., trips that include travel in Ventura County but start or end in an adjacent county), the travel VMT that occurs outside of Ventura County must be added to the boundary-based totals shown in Table 4.16-1. To do this, the Ventura County Transportation Commission (VCTC) model was used for analyzing trips from/to counties east and south of Ventura County and the Santa Barbara County Association of Governments (SBCAG) model was used to analyze trips from/to counties north of Ventura County.

For determining the interregional VMT associated with the unincorporated county, the ratio of the total unincorporated VMT from Table 4.16-1 (4,936,831 miles) was divided by the total VMT in the county (18,676,660 miles). The result shows that 26.4 percent of VMT is attributable to the unincorporated county. This same percentage was applied to the interregional trip VMT from or to neighboring counties.



Source: Data received from Ventura County in 2016

Figure 4.16-1 Roadway Classifications

Adding the total unincorporated VMT from within the county boundaries (4,936,831 VMT from Table 4.16-1) to the interregional trips associated with the unincorporated county (2,563,418 VMT from Table 4.16-2) yields a total trip-based VMT estimate of associated with travel within and to unincorporated Ventura County. The trip-based VMT estimate is reported in Table 4.16-2. For more details regarding the technical approach toward deriving the boundary-based and trip-based VMT estimation, see Appendix F.

Table 4.16-2 2016 Ventura County Unincorporated Trip-Based VMT Estimates

Trip Data Source		VMT
Travel Within Ventura County (Unincorporated)		
Total Unincorporated Boundary-based VMT (from Table 4.16-1)	4,936,831	
Travel Outside of Ventura County that Starts or Ends in County		
Counties South and East of Ventura County Interregional VMT		7,880,729
Counties North of Ventura County Interregional VMT		+ 1,817,008
Total Travel Outside of Ventura County		= 9,697,737
% of Unincorporated Boundary-based VMT		X 26.4%
Total Unincorporated Interregional VMT to Unincorporated Areas ¹	+ 2,563,418	= 2,563,418
Total Unincorporated Trip-Based VMT (Boundary-based + Interregional VMT)	= 7,500,249	
Total Countywide Trip-Based VMT	28,377,397	

¹ Number is slightly different due to rounding.

Source: VCTC 2012 Baseline Model, SBCAG 2015 Baseline Model

4.16.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

OPR Guidelines - Analysis of Transportation Impacts: General Plan Updates

The latest technical guidance on analyzing transportation impacts under CEQA were released by the OPR in December of 2018. This guidance provides technical recommendations regarding assessment of VMT, thresholds of significance, and potential mitigation measures. Trip-based VMT analysis is recommended over boundary-based VMT analysis as the most appropriate methodology for analyzing VMT impacts under CEQA (OPR 2018). Trip-based VMT analysis captures the full extent of the vehicle trip length, even the portion that extends beyond the jurisdictional boundary. The OPR recommended thresholds for residential, office, and retail projects are as follows:

- **Recommended threshold for residential projects:** A proposed project exceeding a level of 15 percent below existing VMT per capita may indicate a significant transportation impact. Existing VMT per capita may be measured as regional VMT per capita or as city VMT per capita. Proposed development referencing a threshold based on city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the number of units specified in the Sustainable Community Strategy (SCS) for that city and should be consistent with the SCS.

- ▶ **Recommended threshold for office projects:** A proposed project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact.
- ▶ **Recommended threshold for retail projects:** A net increase in total VMT may indicate a significant transportation impact.

These thresholds are described in further detail in the following paragraphs.

VMT Impact Analysis

In order to generate the baseline (current) and future (2040) VMT resulting from the proposed 2040 General Plan, the recently updated VCTC countywide Travel Demand Model was used. The VCTC Travel Demand Model (TDM) is based on the Caliper TransCad modeling software. This model provides VCTC and its' member agencies, including the County of Ventura, the capability to generate technical information pertinent to understanding travel behavior and transportation network performance within the county. This information is critical to the analysis of environmental impacts, development, updating, and monitoring of the State and local transportation capital improvement programs, analysis of specific transportation projects and programs, development of transportation strategies and policies, and monitoring environmental factors such as air quality and climate change.

As part of the 2040 General Plan, the following two model scenarios were developed:

- ▶ 2012 Baseline Model – reflects the most recent validated baseline for Ventura County (i.e., existing land use and transportation network); and,
- ▶ 2040 Ventura County General Plan Land Use Model – this reflects the land use growth assumptions in the proposed Ventura County 2040 General Plan for the unincorporated areas and the future land use within the incorporated areas. The transportation network reflects all currently programmed transportation improvement infrastructure projects.

The source of the baseline and future 2040 land use for the VCTC model (for both unincorporated and incorporated areas) is SCAG's 2016 Regional Transportation Plan and SCS. The future land use within the unincorporated areas of Ventura County were reviewed by County staff for accuracy as part of the SCS process and were determined appropriate to be used in the transportation model.

With SB 743 in place (goes into effect July 1, 2020), measuring a project's vehicle congestion-based LOS at affected intersections and/or roadways segments is no longer required for CEQA. Instead, projects are assessed by the VMT generated relative to existing conditions. OPR recommends using the existing VMT of the surrounding region and/or city. This information is typically available from regional travel demand models. The operative countywide travel demand model for Ventura County is maintained by VCTC.

To determine whether VMT impacts are significant, OPR in certain cases recommends a threshold of 15 percent below the VMT per capita of the surrounding region and/or city. This was intended by OPR to achieve general consistency with both the Caltrans statewide target for VMT reduction (20 percent reduction by 2020 relative to a 2010 baseline) and the regional targets for greenhouse gas (GHG) reductions from passenger vehicles established for SCAG

by the California Air Resources Board under SB 375 (19 percent reduction in per capita carbon dioxide (CO₂) emissions from passenger vehicles by 2035 relative to a 2005 baseline).

While LOS is no longer a determination of significance under CEQA, the County will continue to rely on LOS for determining consistency with the General Plan (i.e., for discretionary development that may result in an unacceptable LOS to County roadways) and as the basis for developing project conditions of approval and applying fees on new development for transportation related improvements required to meet General Plan policy consistency.

Ventura County plans to adopt formal thresholds of significance under SB 743 prior to July 1, 2020. In lieu of adopted thresholds, VMT thresholds consistent with OPR's final technical guidance for implementation of SB 743 (OPR 2018) were applied. The selected thresholds for this analysis are provided in Table 4.16-3 and described in the following text.

Table 4.16-3 Analysis of Transportation Impacts Thresholds

Project Type	Metric Unit	Model Trip Types	Target	Baseline VMT	Threshold VMT
Residential	VMT/Capita	Average of all Home Based Trip Types	15% Reduction of Regional Average	9.66	8.21
Office	VMT/Employee	Home Based Work Trips	15% Reduction of Regional Average	13.52	11.49
Industrial	VMT/Employee	Home Based Work Trips	15% Reduction of Regional Average	13.52	11.49
Retail	Net Change in Unincorporated VMT	All Trip Types	No Net Increase	7,500,249	7,500,249
Agriculture	Net Change in Unincorporated VMT	All Trip Types	No Net Increase	7,500,249	7,500,249
Infrastructure	Net Change in Unincorporated VMT	All Trip Types	No Net Increase	7,500,249	7,500,249

For **residential** land uses, OPR recommends a VMT per capita threshold set at 15 percent below baseline levels. Using the VCTC model, the average trip length of all home-based model trip types was used as a surrogate for a per capita estimate. Based on the VCTC baseline model, the average trip length for all home-based trips is 9.66 miles. Applying the 15 percent reduction yields a VMT Threshold for residential land uses of 8.21 miles.

For non-residential land uses, OPR identifies three basic land use categories: office, retail, and mixed use. For **office**, the average trip length of home-based work trips was used as a surrogate for a per employee estimate. Based on the VCTC baseline model, the average trip length for home-based work trips are 13.52 miles. Applying the 15 percent reduction yields a VMT Threshold for office land uses of 11.49 miles. Given that **retail** land uses attract many kinds of trip types (i.e., home based and non-home based trips) and generally redistributes existing retail trips rather than creating new trips, OPR recommends using no net change in either project or regional VMT. Given this programmatic application, the unincorporated trip-based VMT estimate was used to establish this VMT threshold. For **mixed use** development (typically includes a combination of residential and retail/office), OPR guidance suggests applying the threshold of one (or more) of the land uses. Given that land use growth under the 2040 General Plan can be thought of as one holistic mixed-use development, application of the residential, office, and retail thresholds inherently reflects mixed-use development.

Given that the predominant non-residential land uses in Ventura County are industrial and agricultural, these land uses can be generally associated with the OPR non-residential land

use categories. For instance, industrial uses can be considered analogous with office uses in terms of associated work trips while agriculture is unique and would be treated similarly to retail: no net change in either project or regional VMT.

Lastly, OPR recommends the same no net change in either project or regional VMT for roadway improvement projects. The VCTC model includes currently programmed roadway improvement projects included in the Federal Transportation Improvement Program (as reported in the Background Report). Programmed improvements have an identified funding source and are therefore considered as part of the future baseline under CEQA. The VCTC model VMT output inherently captures the potential induced VMT associated by these projects (i.e., longer trip lengths associated with improved access; mode shifts from transit to auto; etc.). Note that the established thresholds for residential and office in this analysis are regionally based and therefore do not distinguish between incorporated versus unincorporated growth or reflect the added length of trips associated with inter-county trips.

THRESHOLDS OF SIGNIFICANCE

As discussed in Chapter 4, “Environmental Impact Analysis,” the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on Ventura County’s adopted Initial Study Assessment Guidelines (ISAG), which include threshold criteria to assist in the evaluation of significant impacts. Appendix G of the State CEQA Guidelines also provides criteria for determining the significance of a project’s impacts, in the form of Initial Study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately frame the programmatic level of analysis for the 2040 General Plan and account for recent revisions to the CEQA Guidelines and the Appendix G checklist.

Specifically, a VMT significance threshold has been added pursuant to State CEQA Guidelines Section 15064.3, which addresses the determination of significance for transportation impacts. It directs that a project’s effects on automobile delay (such as LOS) may no longer be considered a threshold for project transportation impacts, and further directs that VMT is generally the most appropriate measure of transportation impacts. Therefore, ISAG thresholds related to LOS and automobile delay, referenced in Sections 27a(1) and 27a(2) are not included in this analysis. A VMT threshold of significance has been added herein in accordance with CEQA Appendix G. Section 27a(2) discusses the impacts of increased traffic on the safety and design of public roads. This issue is discussed within the framework of VMT rather than LOS or auto delay, consistent with CEQA impact analysis guidelines.

ISAG thresholds related to safety hazards due to a geometric design features or incompatible uses, (27a(2); 27a (3)) emergency access (27a(4)), bicycle, pedestrian, and transit facilities (27b), railroads (27d), harbor facilities (27f); and pipelines (27g) are referenced in the impact significance criteria below. For the purpose of this draft EIR, the following criteria are used in this analysis to determine the level of significance of an adverse impact.

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant transportation impact if it would:

- ▶ Result in VMT exceeding the following thresholds:

- residential land uses: 8.21 mi average of all home-based trip types trip length (15 percent reduction of regional average),
 - office land uses: 11.49 mi average of all home-based-work trips trip length (15 percent reduction of regional average),
 - industrial land uses: 11.49 mi average of all home-based-work trips trip length (15 percent reduction of regional average),
 - retail land uses: 7,500,249 vehicle miles traveled (net increase to baseline unincorporated VMT),
 - agricultural land uses: 7,500,249 vehicle miles traveled (net increase to baseline unincorporated VMT), or
 - infrastructure: 7,500,249 vehicle miles traveled (net increase to baseline unincorporated VMT).
- ▶ Result in new trips along roadways facilities with collision or incident rates above Statewide averages and/or those identified by the Statewide Integrated Traffic Records System (SWITRS) as experiencing a high incident rate.
 - ▶ Result in inadequate emergency access.
 - ▶ Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.
 - ▶ Cause actual or potential barriers to existing or planned pedestrian/bicycle facilities.
 - ▶ Generate or attract pedestrian and/or bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities.
 - ▶ Cause a substantial interference with existing bus transit facilities and/ or routes.
 - ▶ Result in substantial increased demand for additional or new bus transit facilities/ services.
 - ▶ Result in interference with an existing railroad's facilities and/or operations.
 - ▶ Generate an increased demand for commercial boat traffic and/or adjacent commercial boat facilities.
 - ▶ Result in a substantial interference with or affect the operations of an existing pipeline.

ISSUES NOT DISCUSSED FURTHER

A project will have an impact on a harbor if the construction or operation of the project will increase the demand for commercial boat traffic and/or adjacent commercial boat facilities. No such increase is anticipated; however, in the event of such an increase, the significance of the impact (project and cumulative) and any mitigation measures must be determined by the following public entities: Ventura Port District (Ventura Harbor); Harbor Department, County of

Ventura (Channel Islands Harbor); or Oxnard Harbor District (Port of Hueneme). The 2040 General Plan does not address harbors and/ or boat traffic circulation. No impact would occur.

The Area Plans for the communities of El Rio/Del Norte, Lake Sherwood/Hidden Valley, North Ventura Avenue, Oak Park, Ojai Valley, Piru, and Thousand Oaks were reviewed for policies and implementation programs specific to these Area Plans that would potentially have impacts on the environment with respect to land use and planning. The 2040 General Plan would not result in substantive changes to Area Plan policies and implementation programs related to land use and planning. The Area Plan policies and implementation programs related to these issues are consistent with the 2040 General Plan policies and implementation programs, which are addressed in the following impact discussions. Therefore, the environmental effects of the Area Plan goals and policies are not addressed separately in this section.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to transportation and, specifically, the thresholds of significance identified above, include the following:

Circulation, Transportation and Mobility Element

- ▶ **Policy CTM-1.1: Vehicle Miles Traveled (VMT) Standards and CEQA Evaluation.** The County shall require evaluation of County General Plan land use designation changes, zone changes, and discretionary development for their individual (i.e., project-specific) and cumulative transportation impacts based on Vehicle Miles Traveled (VMT) under the California Environmental Quality Act (CEQA) pursuant to the methodology and thresholds of significance criteria set forth in the County Initial Study Assessment Guidelines. (RDR) *[Source: Existing GPP Policy 4.2.2.4, modified]*
- ▶ **Policy CTM-1.2: Projects with Significant Transportation Impacts.** County General Plan land use designation changes, zone changes, and discretionary development that would cause an individual (i.e., project-specific) or cumulative significant transportation impact based on Vehicle Miles Traveled (VMT) under the California Environmental Quality Act (CEQA) shall be prohibited unless:
 1. There are no feasible mitigation measures available that would reduce the impact to a less than significant level; and
 2. The County's decision making body, after balancing, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of the project against its unavoidable transportation impact and any other environmental risks, determines that the benefits of the project outweigh the unavoidable adverse environmental impacts and adopt a statement of overriding considerations pursuant to CEQA. (RDR) *[Source: Existing GPP Policy 4.2.2.5, modified]*
- ▶ **Policy CTM-1.7: Pro Rata Share of Improvements.** The County shall require discretionary development that would generate additional traffic to pay its pro rata share of the cost of added vehicle trips and the costs of necessary improvements to the Regional Road Network pursuant to the County's Traffic Impact Mitigation Fee Ordinance. (RDR) *[Source: Existing GPP 4.2.1.4, 4.2.1.5, 4.2.2.6, and 4.2.2.6, combined and modified]*

- ▶ **Policy CTM-1.8: Discretionary Development in Cities.** The County shall oppose discretionary development within cities, and annexation to cities for the purposes of discretionary development, where such development would individually or cumulatively cause:
 1. Any existing road within the County's Regional Road Network, or any existing County-maintained local road, that is currently functioning at an acceptable Level of Service (LOS) to function below an acceptable LOS pursuant to Policy CTM-1.2; or
 2. Any existing road within the County's Regional Road Network, or any existing County-maintained local road that is currently operating below an acceptable LOS, as determined pursuant to Policy CTM-1.2, to have a worsening of traffic conditions; or
 3. Any project that will create a significant unavoidable transportation impact pursuant to Policy CTM-1.1; or
 4. Any future road planned for addition to the County's Regional Road Network, or any planned future County-maintained local road, to function below an acceptable LOS as determined pursuant to Policy CTM-1.2).

This policy does not apply to those cities which have formally adopted General Plan policies, ordinances, or a reciprocal transportation impact mitigation fee agreement with the County similar to Policies CMT-1.3, CMT-1.4, and CMT-1.5. (RDR) *[Source: Existing GPP Policy 4.2.2.7]*

- ▶ **Policy CTM-1.9: National Highway System Performance Measure and Target Monitoring.** The County shall coordinate with Caltrans and Ventura County Transportation Commission (VCTC) to monitor the performance measures and targets established by Caltrans and Southern California Association of Governments (SCAG) for compliance with the National Performance Management Measures Rule for all roadways designated as part of the National Highway System in Ventura County, including some portions owned or maintained by the County. (SO) *[Source: New Policy]*
- ▶ **Policy CTM-1.10: Direct Traffic to Highways to Preserve County Character.** The County shall strive to direct interregional traffic to federal and state highways. Improvement to County roadways shall not be for the primary purpose of relieving congestion on federal or state highways. (SO) *[Source: Existing GPP Policy 4.2.2.1, modified]*
- ▶ **Policy CTM-1.11: Safe and Efficient Goods Movement.** The County shall coordinate with Caltrans and cities to ensure that truck routes are appropriately designed and designated for the safe and efficient movement of goods throughout the county, particularly to the Port of Hueneme. (IGC) *[Source: New Policy]*
- ▶ **Policy CTM-1.12: Surface Transportation Assistance Act Planning.** The County shall coordinate with Caltrans, cities, and major shipping entities to improve and enhance the Surface Transportation Assistance Act (STAA) Terminal Access routes and STAA network connectivity between and among goods movement modes and facilities (e.g., truck routes/terminals, railroads/yards, shipping lanes/ports, and air-transport/airports). This will include at a minimum adequate STAA Terminal "T" and "S" signage as appropriate to improve wayfinding and access to the National STAA Network. (IGC) *[Source: New Policy]*

- ▶ **Policy CTM-1.13: Grade Separations.** The County shall work with the Naval Base Ventura County (NBVC) to determine the feasibility of grade separations on unincorporated segments of NBVC mobilization corridors to increase mobility and allow for uninterrupted mission operations and military readiness. (IGC) *[Source: New Policy, NBVC JLUS Strategy RC-2B]*
- ▶ **Policy CTM-1.14: Railroad Grade Crossings.** The County shall work with Union Pacific Railroad, the Port of Hueneme, owner of the Ventura County Railroad, Caltrans, cities, and the Ventura County Transportation Commission (VCTC) to continue to enhance roadway safety along railroad grade crossing surfaces through improvements including the installation of concrete railroad grade crossing surface panels. (IGC, SO) *[Source: Existing GPP Goal 4.2.1.12, modified]*
- ▶ **Policy CTM-1.15: Mobilization Corridors.** The County shall work with Naval Base Ventura County (NBVC) and neighboring jurisdictions to enhance circulation for identified roadway mobilization corridors. (IGC) *[Source: New Policy, NBVC JLUS Strategy RC-2B]*
- ▶ **Policy CTM-2.1: Complete Streets.** The County shall prepare and adopt Complete Streets Design Guidelines to be used when constructing new roadways or improving existing roadways where Complete Streets would be appropriate/feasible. The Complete Streets Design Guidelines shall employ a context-sensitive approach to planning and designing the road and street network to reflect the distinct agricultural, rural, or urban character of a particular location. (MPSP) *[Source: New Policy]*
- ▶ **Policy CTM-2.2: Functional Classification.** The County shall plan a roadway system that has adequate capacity and is designed to provide reasonable and safe use by vehicles, public transportation, bicycles and pedestrians with minimum delay pursuant to LOS standards described in Policy CMT-1.2. The road system should follow Federal Highway Administration (FHWA) classification as identified on Figure 4-4. (MPSP) *[Source: New Policy]*
- ▶ **Policy CTM-2.3: County Road Access.** The County shall require discretionary development with access onto a County road to have the access point(s) designed and built to County standards. (RDR) *[Source: New Policy]*
- ▶ **Policy CTM-2.4: Transportation System Safety.** The County shall strive to provide safe operating conditions for all appropriate modes and uses of County roadways. (RDR, MPSP, SO) *[Source: New Policy]*
- ▶ **Policy CTM-2.5: Emergency Services.** The County shall coordinate the development and maintenance of all transportation facilities with emergency service providers to ensure continued emergency service operation and service levels. (IGC) *[Source: New Policy]*
- ▶ **Policy CTM-2.6: Regional Transportation Planning.** The County shall work with Caltrans, Southern California Association of Governments (SCAG), Ventura County Transportation Commission (VCTC), and cities in the county to plan, develop, and maintain regional transportation facilities and services, and to identify existing and future transportation corridors that should be linked across jurisdictional boundaries so that sufficient right-of-way may be preserved. (IGC) *[Source: New Policy]*

- ▶ **Policy CTM-2.7: Congestion Management Program.** The County shall coordinate with Ventura County Transportation Commission (VCTC) to implement and update the Congestion Management Program (CMP). The County shall also encourage consideration of multimodal performance measures as part of future updates to the CMP. (MPSP, IGC) *[Source: New Policy]*
- ▶ **Policy CTM-2.8: Congestion Management Program and County Regional Network Consistency.** For those portions of the County's Regional Road Network currently not designated as part of the Congestion Management Program (CMP), the County shall coordinate with Ventura County Transportation Commission (VCTC) to formally designate applicable County maintained roadways as part of the CMP network. (MPSP, IGC) *[Source: New Policy]*
- ▶ **Policy CTM-2.9: State Route 118 Improvement in Saticoy Area.** The County shall work with the Ventura County Transportation Commission (VCTC) and Caltrans to reprioritize the re-striping of SR 118 from Vineyard Avenue to Darling Road on the Ventura County Congestion Management Plan and the Caltrans list of projects to provide for an additional lane in each direction of travel. (IGC) *[Source: New Policy, Saticoy Area Plan Mobility Program 2 (MOB-P2), modified]*
- ▶ **Policy CTM-2.10: Safe Routes to School.** The County shall work with public and private schools to identify and expand safe routes to school, where feasible. (IGC) *[Source: New Policy]*
- ▶ **Policy CTM-2.11: Efficient Land Use Patterns.** The County shall establish land use patterns that promote shorter travel distances between residences, employment centers, and retail and service-oriented uses to support the use of public transportation, walking, bicycling, and other forms of transportation that reduce reliance on single-passenger automobile trips. (RDR, MPSP) *[Source: New Policy]*
- ▶ **Policy CTM-2.12: Countywide Bicycle Lane and Trail System.** The County shall coordinate with cities in the county and Ventura County Transportation Commission (VCTC) to plan and implement a system of bicycle lanes and multi-use trails that link the cities, unincorporated communities, schools including colleges and universities, commercial/retail, employment centers, health care service facilities, public transportation, and other points of interest. (MPSP, IGC) *[Source: Existing GPP Goal 4.2.1.10, modified]*
- ▶ **Policy CTM-2.13: Transportation System Connectivity.** The County shall strive to eliminate "gaps" in roadways, bikeways, and pedestrian networks by planning for and seeking funding to construct necessary improvements to remove barriers and improve transportation system connectivity as well as connections that support first and last mile accessibility to and from public transportation. (MPSP, PSR, FB) *[Source: New Policy]*
- ▶ **Policy CTM-2.14: Bicycle Facility Design.** When designing new bicycle facilities, or modifying existing roadways with bicycle facilities, the County shall prioritize and install features to improve the safety and visibility of bicyclists. (MPSP) *[Source: New Policy]*
- ▶ **Policy CTM-2.15: Bicycle/Pedestrian Design.** The County shall rely on the guidelines and design standards for bicycle and pedestrian facilities established by the California Manual on Uniform Traffic Control Devices (CAMUTCD) and supporting guidelines

provided the Federal Highway Administration, Caltrans, and the American Association of State Highway and Transportation Officials (AASHTO). (MPSP, PSR, SO) *[Source: New Policy]*

- ▶ **Policy CTM-2.16: Pedestrian Planning.** The County shall consider the safety and accessibility of pedestrians when preparing transportation plans, studies, and reports. (MPSP) *[Source: New Policy]*
- ▶ **Policy CTM-2.17: Support Regional Bicycle Infrastructure.** The County shall support efforts to improve regional infrastructure that will make biking more attractive to residents and tourists. (IGC, SO, JP) *[Source: New Policy]*
- ▶ **Policy CTM-2.18: Complete Streets Standards in Existing Communities.** The County shall require discretionary development in designated Existing Communities to construct roadways to urban standards and Complete Streets principles, including curb, gutter, sidewalks, and bike lanes when there is a nexus for improvement. The County shall rely on the guidelines and design standards for Complete Streets design established by the California Manual on Uniform Traffic Control Devices (CAMUTCD), Caltrans in the Highway Design Manual, and Complete Streets Guidelines (pursuant to Deputy Directive-64-R2), Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO). (RDR) *[Source: New Policy]*
- ▶ **Policy CTM-2.19: Safety Metrics.** The County shall continue to examine and update safety metrics for California Environmental Quality Act (CEQA) impact analysis as appropriate. Options include but are not limited to: queue spill-back at intersections; mid-block unprotected crossings; and, increased crossing distances. (RDR) *[Source: New Policy]*
- ▶ **Policy CTM-2.20: Safe Pedestrian Crossings.** The County shall improve pedestrian safety at intersections and mid-block locations in Existing Communities through approved features consistent with the California Manual on Uniform Traffic Control Devices (CAMUTCD), Highway Design Manual, Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO), and the National Cooperative Highway Research Program Report 498 (Application of Pedestrian Crossing Treatments for Streets and Highways). (RDR, SO) *[Source: New Policy]*
- ▶ **Policy CTM-2.21: Pedestrian/Bicycle Conflicts along Overweight Vehicle Corridor and Surface Transportation Assistance Act (STAA) Truck Routes.** Within Existing Communities, the County shall provide/retrofit separated or buffered pedestrian and bicycle paths from the outside travel lane along County Road Network roads that are designated Overweight Vehicle Corridors and STAA designated Terminal Access Routes. Where the application or retrofitting of separated or buffered facilities is not feasible, the County shall prioritize alternative pedestrian and bicycle connections that encourage and attract pedestrian and bicycle traffic off designated Overweight Vehicle Corridors or STAA designated truck routes. (MPSP) *[Source: New Policy]*
- ▶ **Policy CTM-2.22: Funding and Maintenance for Sidewalks.** The County shall seek funding sources first for construction of new sidewalks in low-income areas and then for sidewalk maintenance particularly in low-income areas. (FB) *[Source: New Policy]*

- ▶ **Policy CTM-2.23: Intercommunity and Countywide Public Transportation System.** The County shall continue to work with Ventura County Transportation Commission (VCTC), Naval Base Ventura County, and local public transportation regional bus service providers to promote the expansion of a safe, efficient, convenient, integrated, and cost-effective intercommunity and countywide public transportation and bus service that provides county residents with access to employment, commercial services, health and medical facilities, social services, educational facilities and institutions, and personal business destinations. (IGC) *[Source: Existing GPP Goal 4.2.1.7, modified]*
- ▶ **Policy CTM-2.24: Non-Drivers Living in Rural Areas.** The County shall work with Ventura County Transportation Commission (VCTC) and local public transportation providers to address the needs of non-drivers living in rural areas to provide public transportation and paratransit service. (IGC) *[Source: New Policy]*
- ▶ **Policy CTM-2.25: Amtrak Service Improvements.** The County shall support the recommendations of the California State Rail Plan for Amtrak trains, including track and signalization upgrades, increasing service frequencies by adding additional round-trip service to regional destinations north and south of Ventura County, improving passenger information and comfort, and reducing travel time. (IGC) *[Source: New Policy]*
- ▶ **Policy CTM-2.26: Abandoned Railroad Rights-of-Way.** When railroad rights-of-way are abandoned, the County shall evaluate the feasibility of acquiring the land for public use as public transportation, bicycle, pedestrian, or equestrian paths. (MPSP) *[Source: Existing GPP Policy 4.2.2.9, modified]*
- ▶ **Policy CTM-2.27: Discretionary Development and Conditions of Approval to Minimize Traffic Impacts.** The County shall require that discretionary development be subject to permit conditions of approval, where feasible, to minimize traffic impacts by incorporating pedestrian and bicycle pathways, bicycle racks and lockers, ridesharing programs, transit improvements (bus turnouts, shelters, benches), and/or transit subsidies for employees or residents of the proposed development. (RDR) *[Source: Existing GPP Goal 4.2.2.8, modified]*
- ▶ **Policy CTM-3.1: Bicycle Network Strategy and Prioritization.** The County shall identify and prioritize components of a bicycle network to increase public access and ridership on bicycle routes. (MSPR, SO) *[New Policy, 5/23/2017, Agenda Item No. 42, Board of Supervisors' Study Session of Standards for Prioritizing Construction of Future Bike Lane Improvements]*
- ▶ **Policy CTM-3.2: Inclusive Bicycle Network.** The County shall develop a bicycle network for all user types and routes across the county. (MPSR, SO, PI) *[Source: Ventura County Transportation Commission, Wayfinding Study]*
- ▶ **Policy CTM-3.3: Regional Destination Focus for Bicycle Network.** The County shall encourage the development of a bicycle network that connects to regional destinations such as parks, trails, educational institutions, employment centers, transit, park and ride lots, and tourist destinations. (IGC) *[Source: Ventura County Transportation Commission, Wayfinding Study]*

- ▶ **Policy CTM-3.4: Inter-jurisdictional Bicycle Network Connectivity.** The County shall promote bicycle network connectivity between Ventura County communities as well as Santa Barbara and Los Angeles Counties. (IGC) *[Source: Ventura County Transportation Commission, Wayfinding Study]*
- ▶ **Policy CTM-3.5: Bicycle Routes in Rural Areas.** The County shall plan for bicycle network connectivity in rural, agricultural, and open space areas in a way that supports and complements business and agricultural activities in those areas. (JP) *[Source: New Policy]*
- ▶ **Policy CTM-3.6: Coordination with Bicycle Wayfinding Plan.** The County shall support the Complete Streets effort by, when feasible, constructing bicycle lanes on County maintained roads listed in the Ventura County Transportation Commission Bicycle Wayfinding Plan. (SO, JP, IGC) *[Source: New Policy]*
- ▶ **Policy CTM-3.7: Bicycle Trail along Santa Paula Branch Line.** The County shall encourage the construction of a bicycle trail along the Santa Paula Branch Line Railroad in the unincorporated area between the cities of Ventura and Santa Paula. (SO, JP, IGC) *[Source: New Policy]*
- ▶ **Policy CTM-3.8: Bicycle Network Routes and Wayfinding.** The County shall use clear and consistent message and placement for on- and off-street regional bikeways and to regional destinations. (PI, SO) *[Source: Ventura County Transportation Commission, Wayfinding Study]*
- ▶ **Policy CTM-3.9: Funding for Bicycle Network and Wayfinding Planning and Improvements.** The County shall actively pursue outside funding opportunities for bicycle network improvements. (FB, JP) *[Source: New Policy]*
- ▶ **Policy CTM-3.10: Bicycle Storage Facilities.** The County shall require adequate bicycle storage facilities (e.g., bicycle racks, lockers) for discretionary development as determined by allowable land uses at a given site. (RDR) *[Source: New Policy]*
- ▶ **Policy CTM-4.1: Reduce Vehicle Miles Traveled (VMT).** The County shall work with Caltrans and Ventura County Transportation Commission (VCTC) to reduce VMT by:
 - Facilitating the efficient use of existing transportation facilities;
 - Striving to provide viable modal choices that make driving alone an option rather than a necessity;
 - Supporting variable work schedules to reduce peak period VMT, and
 - Providing more direct routes for pedestrians and bicyclists.

(MPSP, SO) *[Source: Existing GPP Goal 4.2.1.6, modified]*
- ▶ **Policy CTM-4.2: Alternative Transportation.** The County shall encourage bicycling, walking, public transportation, and other forms of alternative transportation to reduce Vehicle Miles Traveled (VMT), traffic congestion, and greenhouse gas emissions. (PI) *[Source: New Policy]*
- ▶ **Policy CTM-4.3: Vehicle Occupancy.** The County shall work with a broad range of agencies (e.g., Caltrans, Ventura County Transportation Commission (VCTC), Amtrak,

Ventura County Air Pollution Control District, public transportation providers and shared mobility vendors) to encourage and support programs that increase vehicle occupancy including the provision of traveler information, shuttles, and preferential parking for carpools/vanpools. (IGC, PI) *[Source: New Policy]*

- ▶ **Policy CTM-4.4: Park-and-Ride Facilities.** The County shall coordinate with Caltrans and Ventura County Transportation Commission (VCTC) to identify future park-and-ride lots within the unincorporated areas of Ventura County to facilitate more carpooling, vanpooling, and public transportation use. (IGC) *[Source: New Policy]*
- ▶ **Policy CTM-6.1: Routine Use of Alternative Transportation Options.** The County shall support the integration of emerging technologies that increase the routine use of alternative transportation options to decrease single-passenger automobile travel. (MPSP) *[Source: New Policy]*
- ▶ **Policy CTM-6.2: Autonomous Technology.** The County shall continue to consider and assess the implications of autonomous vehicles, alternative energy vehicles, and other transportation technological advancements on mobility planning and infrastructure. (MPSP) *[Source: New Policy]*
- ▶ **Policy CTM-6.3: Permeable Pavement.** As part of new roadway planning and design as part of discretionary development, the County shall promote the use of permeable paving and other passive drainage features such as bio-swales to prevent flooding, particularly in urban areas (RDR, SO) *[Source: New Policy]*
- ▶ **Policy CTM-6.4: Facilities for Emerging Technologies.** The County shall support the development of alternative fueling stations (e.g., electric and hydrogen) and vehicle-to-infrastructure (V2I) technology for emerging technologies. (SO) *[Source: New Policy]*
- ▶ **Policy CTM-6.5: Electric Vehicle Charging Stations.** The County shall support the installation of electric vehicle charging stations, where feasible, at County facilities, parking lots, park-and-ride lots, truck stops, and new development. (RDR, SO) *[Source: New Policy]*
- ▶ **Policy CTM-6.6: Neighborhood Electric Vehicles.** The County shall encourage developments and street systems that support the use of properly licensed Neighborhood Electric Vehicles (NEV), where appropriate. (MPSP) *[Source: New Policy]*
- ▶ **Policy CTM-6.7: Shared Mobility Operations.** The County shall encourage and support car share operators at multimodal facilities including public transportation hubs, passenger rail stations, and park-and-ride lots.
- ▶ **Policy CTM-6.8: Micro-Mobility Operations.** The County shall evaluate the feasibility and work to establish requirements for shared micro-mobility (e.g., bike sharing) vendors within unincorporated areas. (RDR) *[Source: New Policy]*
- ▶ **Policy CTM-6.9: Mobility-as-a-Service Enterprises – Vehicle Operations.** The County shall encourage Mobility-as-a-Service (MaaS) providers to park between service calls versus driving within unincorporated communities (RDR, SO) *[Source: New Policy]*
- ▶ **Policy CTM-6.10: Mobility-as-a-Service Enterprises – Support Public Transportation.** The County shall encourage Mobility-as-a-Service (MaaS) providers to coordinate with

public transportation providers that serve unincorporated areas to increase the attractiveness of public transportation through the provision of free or subsidized public transportation patron first and last mile connections within unincorporated communities (IGC, JP) *[Source: New Policy]*

- ▶ **Policy CTM-6.11: Mobility-as-a-Service Enterprises – Streetscape Design.** The County shall consider the need for designated curb space for Mobility-as-a-Service (MaaS) drop-off and pick-up activity in commercial/retail areas within unincorporated communities (SO) *[Source: New Policy]*
- ▶ **Policy CTM-7.1: Federal and State Funding.** The County shall identify, develop, and prioritize transportation projects to best compete for federal and state funds for roadway safety improvements, public transportation, bicycle and pedestrian improvements. (IGC) *[Source: New Policy]*
- ▶ **Policy CTM-7.2: Local Funding Mechanisms.** The County shall continue to use local financing mechanisms such as gas tax, vehicle registration fees, and Traffic Impact Mitigation Fees to help fund transportation projects. The County shall continue to support regional and county-wide measures for transportation funding. (FB) *[Source: New Policy]*

Implementation Programs

- ▶ **Implementation Program A: Traffic Impact Mitigation Fee Program.** The County shall update its Traffic Impact Mitigation Fee Program and perform a comprehensive update to the program every five (5) years pursuant to Government Code Section 66000 et seq. *[Source: New Program]*
- ▶ **Implementation Program B: Initial Study Assessment Guidelines.** The County shall update and adopt its' Initial Study Assessment Guidelines to address Vehicle Miles Traveled (VMT) and safety metrics pursuant to CEQA Guidelines Section 15064.3. *[Source: New Program]*
- ▶ **Implementation Program C: Vehicle Miles Traveled (VMT) Reduction Program.** To support climate change related goals and CEQA related VMT policies per SB 743 (2013), the County shall develop a Vehicle Miles Traveled Reduction Program. *[Source: New Program]*
- ▶ **Implementation Program D: Regional Road Network Coordination.** The County shall continue to coordinate across its own agencies as well as with cities in Ventura and Los Angeles Counties and Caltrans to identify needed improvements to the Regional Road Network.

This will include identification of funds available and needed for County and cities inter-city road-building purposes to construct improvements. *[Source: Existing GPP Program 4.2.3.2, modified]*

- ▶ **Implementation Program E: Pavement Management System.** The County shall continue to maintain its Pavement Management System (PMS) to identify Pavement Condition Index (PCI) and ensure that the County road network is kept in a state of good repair with an emphasis and priority on goods movement corridors (e.g., Surface Transportation Assistance Act, Overweight Vehicle corridor, or local County roadways designated as part

of the National Highway System). The PCI thresholds for pavement rehabilitation shall be based on guidance provided by the Board of Supervisors. *[Source: New Program]*

- ▶ **Implementation Program F: Overweight Vehicle Corridors.** The County shall designate its Overweight Vehicle Corridors as Surface Transportation Assistance Act (STAA) Terminal Access routes to connect to the National Network. *[Source: New Program]*
- ▶ **Implementation Program G: Grade Separations.** The County shall work with the Naval Base Ventura County (NBVC) to determine feasibility of grade separations for segments of the mobilization corridors to ease mobility and allow for uninterrupted mission operations and military readiness. *[Source: New Program, NBVC JLUS Strategy RC-2B]*
- ▶ **Implementation Program H: Complete Streets Guidelines.** The County shall prepare and adopt Complete Streets Design Guidelines/standards to be used when constructing new roadways or improving existing roadways where Complete Streets would be appropriate/feasible. Complete Streets Design Guidelines/standards should be consistent with the pedestrian and bicycle design guidelines and design standards established by Caltrans and supporting state/federal guidelines when designing bicycle/pedestrian facilities. These include the California Manual on Uniform Traffic Control Devices (CAMUTCD), Highway Design Manual, Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO).

The County shall improve pedestrian safety at intersections and mid-block locations in developed communities by providing pedestrian crossing treatments where appropriate. *[Source: New Program]*

- ▶ **Implementation Program I: County Road Standards Update.** The County shall update Road Standards to include the Complete Street Design Guidelines/Standards. *[Source: New Program]*
- ▶ **Implementation Program J: Vision Zero.** The County shall develop a Vision Zero strategy for the County of Ventura with the goal of reducing all traffic fatalities and severe injuries, while increasing safe, healthy, equitable mobility for all. *[Source: New Program]*
- ▶ **Implementation Program K: Safe Routes to School.** The County shall support the Safe Routes to School Program by identifying opportunities to support bike and pedestrian routes to schools, identify needed improvements and opportunities to increase public access and use of these routes. *[Source: New Program]*
- ▶ **Implementation Program L: Master Bicycle Network Plan.** The County shall develop a master bicycle network plan that includes the recommendations from the Bicycle Wayfinding Study and the prioritized list of bike lanes from the Board approved criteria. *[Source: New Program]*
- ▶ **Implementation Program M: Bicycle Wayfinding Plan Participation.** The County shall continue to participate in and support the Ventura County Transportation Commission in updates to the Bicycle Wayfinding Plan linking all Ventura County cities, unincorporated communities, and CSUCI. *[Source Existing GPP Program 4.2.3.7, modified]*
- ▶ **Implementation Program N: Storage Facilities for Shared Mobility Enterprises.** The County shall analyze the feasibility of shared micro-mobility (e.g., bike sharing) vendors being required to provide storage/parking areas or facilities to be designated and/or

physically placed outside of the public right-of-way if private shared mobility vendors are allowed to operate within the unincorporated areas of the county. *[Source: New Program]*

- ▶ **Implementation Program O: Mobility-as-a-Service Enterprises – Parking.** The County shall consider designating parking areas in County parking facilities for Mobility-as-a-Service (MaaS) vehicles to use between customer service runs and will work with cities to provide locations as well. *[Source: New Program]*

Land Use and Community Character Element

- ▶ **Policy LU-11.3: Design.** The County shall require new commercial and industrial developments to be designed to be generally compact, grouped and consolidated into functional units providing for sufficient off-street parking and loading facilities, maximize pedestrian and vehicle safety, reduce vehicle miles traveled (VMT), encourage electric vehicle charging, and minimize land use conflicts and traffic congestion. The County shall require that commercial and industrial discretionary development is designed to provide adequate buffering (e.g., walls, landscaping, setbacks) and operational conditions (e.g., hours of operation, and scheduling of deliveries) to minimize adverse impacts (e.g., noise, glare, and odors) on adjoining and adjacent residential areas. (RDR) *[Source: Existing GPP Policies 3.4.2.3 and 3.4.2.4, modified]*
- ▶ **Policy LU-16.5: Multimodal Access to Commercial Development.** The County shall encourage discretionary commercial development to promote ease of pedestrian/bicycle access to encourage walk-in business, while providing sufficient off-street parking. (RDR) *[Source: Existing El Rio/Del Norte Area Plan Goal 3.7.2.2, El Rio/Del Norte Area Plan Goal 3.7.1.4, Piru Area Plan Policy 3.2.2.6, and Oak Park Area Plan Policy 3.4.2.2]*

Public Facilities, Services, and Infrastructure Element

- ▶ **Policy PFS-2.6: County Employee Trip Reduction.** The County shall encourage its employees to reduce the number and distance of single-occupancy vehicle work trips. (SO) *[Source: New Policy]*
- ▶ **Policy PFS-F: Trip Reduction for County Staff.** The County shall provide support for the following trip-reduction methods for County staff members:
 - carpooling/vanpooling,
 - active transportation options (e.g., pedestrian or biking),
 - use of electric or alternative energy vehicles, and
 - public transit use.

These will be accomplished through incentives, such as dedicated parking areas, electric vehicle (EV) charging stations at County facilities, carpool/vanpool coordination, and flexible work shifts. *[Source: New Program]*

Hazards and Safety Element

- ▶ **Policy HAZ-10.6: Transportation Control Measures Programs.** The County shall continue to work with the Ventura County Air Pollution Control District (APCD) and Ventura County Transportation Commission (VCTC) to develop and implement Transportation Control Measures (TCM) programs consistent with the APCD's Air Quality Management Program (AQMP) to facilitate public transit and alternative transportation modes within the

county. (IGC, FB) [Source: Existing GPP Policy 1.2.2.4 and Existing El Rio/Del Norte Area Plan Program 1.1.3.1, modified]

- **Policy HAZ-10.8: Alternative Transportation Modes.** The County shall promote alternative modes of transportation that reduce single-occupancy vehicle (SOV) travel and enhance “last-mile” transportation options to improve air quality. (IGC, JP, PI) [Source: El Rio/Del Norte Area Plan Goal 1.1.1.2, modified]

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.16-1: Exceed VMT Thresholds

The land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water. Specifically, Policy COS-7.7 would require that new discretionary oil wells use pipelines to convey oil and produced water; oil and produced water shall not be trucked. The reduction of trucking of crude oil and produced water resulting from this policy would result in a potential reduction of VMT in the unincorporated county. Potential impacts on petroleum resources related to this policy are addressed in Section 4.12, “Minerals and Petroleum Resources,” of this draft EIR.

Forecasted VMT Estimates

Table 4.16-4 displays the 2040 projections of the trip-based VMT for Ventura County. This forecast is based on the 2040 VCTC and 2040 SBCAG travel demand model forecasts. Like the baseline calculations, the same 26.4 percent distribution was used to allocate interregional trips to unincorporated areas.

Total countywide trip-based VMT is estimated to be 30,936,520 per day. The amount of trip-based VMT associated with the unincorporated Ventura County is 8,173,937 per day.

Table 4.16-4 Ventura County Daily VMT Estimates (2040 Forecast)

Trip Data Source	VMT
Travel Within Ventura County (Unincorporated)	
Total Unincorporated Boundary-based VMT	5,337,751
Total Incorporated VMT (Boundary)	14,855,640
Travel Outside of Ventura County that Starts or Ends in County	
Counties South and East of Ventura County Interregional VMT	8,700,996
Counties North of Ventura County Interregional VMT	+ 2,042,133
Total Travel Outside of Ventura County	= 10,743,129
% of Unincorporated Boundary-based VMT	X 26.40%
Total Unincorporated Interregional VMT to Unincorporated Areas	+ 2,836,186
Total Unincorporated Trip-Based VMT (Boundary-based + Interregional VMT)	= 8,173,937
Total Countywide Trip-Based VMT	30,936,520

Source: VCTC 2040 Model, SBCAG 2040 Model, 2016 HPMS, GHD via 2017 Caltrans Volume Report

Table 4.16-5 displays the increment of VMT change associated with the growth identified in the 2040 General Plan for each land use type threshold, and results of the impact analysis conducted herein. Note that the established thresholds for the residential and office in this analysis are regionally based and therefore do not distinguish between incorporated versus unincorporated growth or reflect the added length of trips associated with inter-county trips.

Table 4.16-5 Transportation Thresholds

Project Type	Metric Unit	Target	Threshold	2040 General Plan	Impact
Residential	VMT/Capita	15% Reduction of Regional Average	8.21	9.96	Yes
Office	VMT/Employee	15% Reduction of Regional Average	11.49	14.51	Yes
Industrial	VMT/Employee	15% Reduction of Regional Average	11.49	14.51	Yes
Retail ¹	Regional Net Change in VMT	No Net Increase	7,500,249	8,173,937	Yes
Agriculture ¹	Regional Net Change in VMT	No Net Increase	7,500,249	8,173,937	Yes
Infrastructure ¹	Regional Net Change in VMT	No Net Increase	7,500,249	8,173,937	Yes

¹ The added VMT increment is not specifically attributable to this specific land use but is an aggregate estimate of VMT.

The 2040 General Plan includes policies and programs designed to reduce VMT to a reasonable extent. Several 2040 General Plan policies and programs address VMT directly while others support reduction through multimodal transportation improvements.

Policy CTM-1.2 is consistent with CEQA analysis and mitigation standards, with the goal of reducing VMT to the extent feasible. Policy CTM-4.1 and CTM Implementation Programs B and C were designed to specifically address VMT evaluation, analysis, and reduction standards for future projects. Inclusion of these items in the 2040 General Plan indicate a commitment to adequately and effectively analyze VMT transportation impacts in accordance with updates to the State CEQA Guidelines and implementation of SB 743. Relative to quantification of VMT reductions, CTM Implementation Program C requires the County to develop a VMT reduction program, which will identify strategies to reduce VMT through a variety of methods. CTM Implementation Program C would be a performance-based VMT reduction program to be developed following adoption of the 2040 General Plan. Under CTM Implementation Program C, the County is required to identify performance metrics to determine the efficacy of the program to reduce VMT. The program may include coordination internally between County departments and externally (e.g., VCTC, Caltrans, transit providers, etc.) toward the variety of potential measures identified by OPR, and the County shall continue to find ways to reduce VMT (OPR 2018:27). Many of these potential measures are referenced in the policies and programs proposed within the 2040 General Plan, including a commitment to improving access to and safety of non-vehicular travel modes, provision of and support for Transportation Demand Management (TDM) and Transportation System Management (TSM) programs, promoting the use of transit and other shared mobility options. While the actual measures are part of a program to be developed, CTM Implementation Program C should go further in specifying a minimum reduction level and providing potential reduction methods that can be included in the County's VMT Reduction Program. This program can serve as a resource to offset VMT impacts related to discretionary development relative to the VMT thresholds developed through Implementation Program CTM-B.

In addition to the policies and programs discussed above, many other policies and programs logically support the goal of VMT reduction through a variety of means, including: encouraging the access, connectivity, and safety of vehicle-alternative modes, including bicycle, pedestrian, public transit, and passenger rail modes; efficient land-use patterns that shorten travel distances; and travel demand and mobility programs that reduce single-occupancy vehicle use. These policies and programs include the following:

Policies:

- ▶ CTM-2.10: Safe Routes to School
- ▶ CTM-2.11: Efficient Land Use Patterns
- ▶ CTM-2.12: Countywide Bicycle Lane and Trail System
- ▶ CTM-2.13: Transportation System Connectivity
- ▶ CTM-2.17: Support Regional Bicycle Infrastructure
- ▶ CTM-2.23: Intercommunity and Countywide Public Transportation System
- ▶ CTM-2.25: Amtrak Service Improvements

- ▶ CTM-2.26: Abandoned Railroad Rights-of-Way
- ▶ CTM-2.27: Discretionary Development and Conditions of Approval to Minimize Traffic Impacts
- ▶ CTM-3.1: Bicycle Network Strategy and Prioritization
- ▶ CTM-3.2: Inclusive Bicycle Network
- ▶ CTM-3.3: Regional Destination Focus for Bicycle Network
- ▶ CTM-3.4: Inter-jurisdictional Bicycle Network Connectivity
- ▶ CTM-3.5: Bicycle Routes in Rural Areas
- ▶ CTM-4.2: Alternative Transportation
- ▶ LU-16.5: Multimodal Access to Commercial Development
- ▶ CTM-4.3: Vehicle Occupancy
- ▶ CTM-4.4: Park-and-Ride Facilities
- ▶ CTM-6.1: Routine Use of Alternative Transportation Options
- ▶ CTM-6.7: Shared Mobility Operations
- ▶ CTM-6.8: Micro-Mobility Operations
- ▶ PFS-2.6: County Employee Trip Reduction
- ▶ PFS-F: Trip Reduction for County Staff
- ▶ HAZ-10.6: Transportation Control Measures Programs
- ▶ HAZ-10.8: Alternative Transportation Modes

Implementation Programs:

- ▶ K Safe Routes to School
- ▶ L Master Bicycle Network Plan

The Ventura County Non-Coastal Zoning Ordinance also contains specific requirements designed to reduce VMT. Section 8108-4.8.1 requires an applicant funded Transportation Demand Management Plan to reduce vehicle trips if reduced parking is sought. Section 8109-0.7 also provides minimum requirements of the applicant prior to the approval of discretionary development as it relates to standards for transportation demand management and trip reduction measures. These standards provide an opportunity to reduce VMT and encourage mode shift to non-vehicular travel modes.

Future development and other physical changes under the 2040 General Plan would result in increased VMT beyond the applicable thresholds, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure CTM-1: New Implementation Program CTM-X: Interim Vehicle Miles Traveled CEQA

Assessment Criteria

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program CTM-X: Interim Vehicle Miles Traveled CEQA

Assessment Criteria

Following June 30, 2020 and prior to completion of Implementation Program CTM-B, all projects (not otherwise exempt from CEQA analysis) shall be evaluated for potential environmental impacts relative to VMT using the State's minimum reduction standards, as follows:

<u>Project Type</u>	<u>Measurement Unit</u>	<u>Model Trip Types</u>	<u>Minimum Criteria</u>	<u>Baseline VMT</u>	<u>Threshold VMT</u>
<u>Residential</u>	<u>VMT/Capita</u>	<u>Average of all Home Based Trip Types</u>	<u>15% Reduction of Regional Average</u>	<u>9.66</u>	<u>8.21</u>
<u>Office</u>	<u>VMT/Employee</u>	<u>Home Based Work Trips</u>	<u>15% Reduction of Regional Average</u>	<u>13.52</u>	<u>11.49</u>
<u>Industrial</u>	<u>VMT/Employee</u>	<u>Home Based Work Trips</u>	<u>15% Reduction of Regional Average</u>	<u>13.52</u>	<u>11.49</u>
<u>Retail</u>	<u>Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase in Regional VMT</u>	<u>7,500,249</u>	<u>7,500,249</u>
<u>Agriculture</u>	<u>Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase in Regional VMT</u>	<u>7,500,249</u>	<u>7,500,249</u>
<u>Infrastructure</u>	<u>Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase in Regional VMT</u>	<u>7,500,249</u>	<u>7,500,249</u>
<u>All Other Project Types</u>	<u>Unincorporated VMT</u>	<u>All Trip Types</u>	<u>No Net Increase in Regional VMT</u>	<u>7,500,249</u>	<u>7,500,249</u>

If a proposed project is found to have a significant impact on VMT, the impact must be reduced, as feasible, by modifying the project's VMT to a level below the established thresholds of significance and/or mitigating the impact through multimodal transportation improvements or mitigations to enhance transportation mode shift (use of alternative transportation modes). Following completion and adoption of VMT thresholds as part of the Ventura County ISAG, this implementation program shall no longer apply.

Mitigation Measure CTM-2: Revised Implementation Program CTM-B: Initial Study Assessment Guidelines

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

Implementation Program CTM-B: Initial Study Assessment Guidelines

The County shall update and adopt its' Initial Study Assessment Guidelines (ISAG) to address Vehicle Miles Traveled (VMT) and safety metrics pursuant to CEQA Guidelines Section 15064.3. This program shall consider inclusion of the following components:

- ▶ Establishment of screening criteria to define projects not required to submit detailed VMT analysis, such as infill projects, inclusion of locally serving commercial, transit supportive projects, or transportation enhancements that reduce VMT;

- ▶ Establishment of thresholds for identifying VMT related transportation impacts (to meet or exceed State requirements);
- ▶ Standard mitigation for significant transportation impacts; and
- ▶ Specify the County's procedures for reviewing projects with significant and unavoidable impacts, under CEQA, related to VMT.

Mitigation Measure CTM-3: Revised Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program
The County shall include the following revised implementation program in the 2040 General Plan.

Implementation Program CTM-C: Vehicle Miles Traveled (VMT) Reduction Program

To support climate change related goals and CEQA related VMT policies pursuant to SB 743 (2013), the County shall develop a VMT Reduction Program. This program should contain a range of project- and program-level mitigations and VMT reduction strategies, that could include:

- ▶ Preparation of a Transportation Demand Management (TDM) program to promote mode shifts from single occupant vehicle use to transit, ridesharing, active transportation, telecommuting, etc.; and,
- ▶ Transportation System Management applications such as park-and-ride lots, intelligent transportation system (ITS) field deployment, pavement management, etc.

During implementation of the 2040 General Plan, the County shall review and update the VMT Reduction Program as warranted to provide additional mitigations and programs.

Significance after Mitigation

Policies and implementation programs described in the 2040 General Plan provide a number of self-mitigating approaches to VMT impacts that would result from implementation of the 2040 General Plan. While the policies and implementation programs described in the 2040 General Plan herein indicate that the County is committed to VMT reduction, the County has identified Mitigation Measures CTM-1, CTM-2, and CTM-3 to provide better direction on the methods to be used to reduce VMT impacts to the extent feasible.

Mitigation Measures CTM-1, CTM-2, and CTM-3 would reduce the rate of VMT associated with existing and future development in Ventura County, but the impact would not be reduced to less than significant due to the increased development, new roadways, and increased numbers of users of the County's transportation system that would result from the growth accommodated by the 2040 General Plan. Project-level impact mitigation shall be analyzed in order to reduce the significance of VMT-related impacts. The County's VMT Reduction Program shall be continually improved and innovated to require VMT reduction to the extent feasible. This impact would be **significant and unavoidable**.

Impact 4.16-2: Transportation Infrastructure Needed to Accommodate Growth Would Result in Adverse Effects Related to County Road Standards and Safety

Implementation of the proposed 2040 General Plan would cause new trips to be added along existing substandard roadway facilities that do not comply with County road standards, producing safety concerns.

Changes to land use associated with the 2040 General Plan would result in new trips and increased VMT along a number of roadway facilities. These facilities may include those with collision or incident rates above statewide averages or those identified by the Statewide Integrated Traffic Records System as experiencing particularly high collision incidence rates. However, a quantitative analysis of collision rates on County roadways would need to occur in order to substantiate this statement. This type of analysis is more appropriate for a project-specific impact analysis. Because increased VMT may affect roadways with high collision incidence, a potentially significant impact may result.

Currently, there are five designated substandard roadway impact areas: (1) Upper Ojai; (2) Santa Susana; (3) Santa Susana Knolls; (4) Ventu Park; and, (5) Yerba Buena as shown in Figure 4.16-2. Many of the roadways in these areas were designed to facilitate moving agricultural products to market. Consequently, these roadways were not designed to accommodate commuter oriented or regional traffic. Using the VCTC travel demand model, the primary County roadways serving each of these substandard roadway impact areas were analyzed for unincorporated county roadway traffic growth. Baseline and 2040 daily traffic forecasts on identified roadways were generated and are shown in Table 4.16-6. Pursuant to the ISAG impact criteria, the net increase in daily traffic volumes on Box Canyon Road and portions of Katherine Road in the Santa Susana Knolls community and portions of Lynn Road, Ventu Park Road, and Haigh Road in the Ventu Park community would result in a safety impact.

Table 4.16-6 Substandard Roadways Impacted

Sub-Standard Area	Road	Location	Baseline ADT	Future ADT	Net ADT	Impact
Upper Ojai	Sulphur Mountain Road		n/a	n/a	n/a	n/a
Santa Susana	Santa Susan Pass Road	West of Box Canyon	10,608	10,138	-470	No
Santa Susana	Santa Susan Pass Road	East of Box Canyon	10,123	7,083	-3,040	No
Santa Susana	Box Canyon Road		6,991	8,174	1,183	Yes
Santa Susana Knolls	Katherine Road	West of Kuehner	1,474	1,705	231	Yes
Ventu Park	Lynn Road	West of Ventu	16,818	17,333	515	Yes
Ventu Park	Lynn Road	East of Ventu	17,607	18,979	1,372	Yes
Ventu Park	Ventu Park Road	North of Lynn	3,425	4,469	1,044	Yes
Ventu Park	Ventu Park Road	South of Lynn	1,194	1,408	214	Yes
Ventu Park	Ventu Park Road	South of Newbury	9,531	9,656	125	Yes
Ventu Park	Ventu Park Road	North of Newbury	7,658	8,211	553	Yes
Ventu Park	Haigh Road		3,312	3,399	87	Yes
Yerba Buena	Yerba Buena Road	South Side	834	762	-72	No
Yerba Buena	Yerba Buena Road	North Side	1,242	966	-276	No

Traffic generated by buildout of the proposed 2040 General Plan land use would not substantially increase existing traffic volumes. However, traffic generated by buildout of the 2040 General Plan would result in a net increase in traffic volumes within three of the County designated substandard roadway impact areas related to safety impacts.

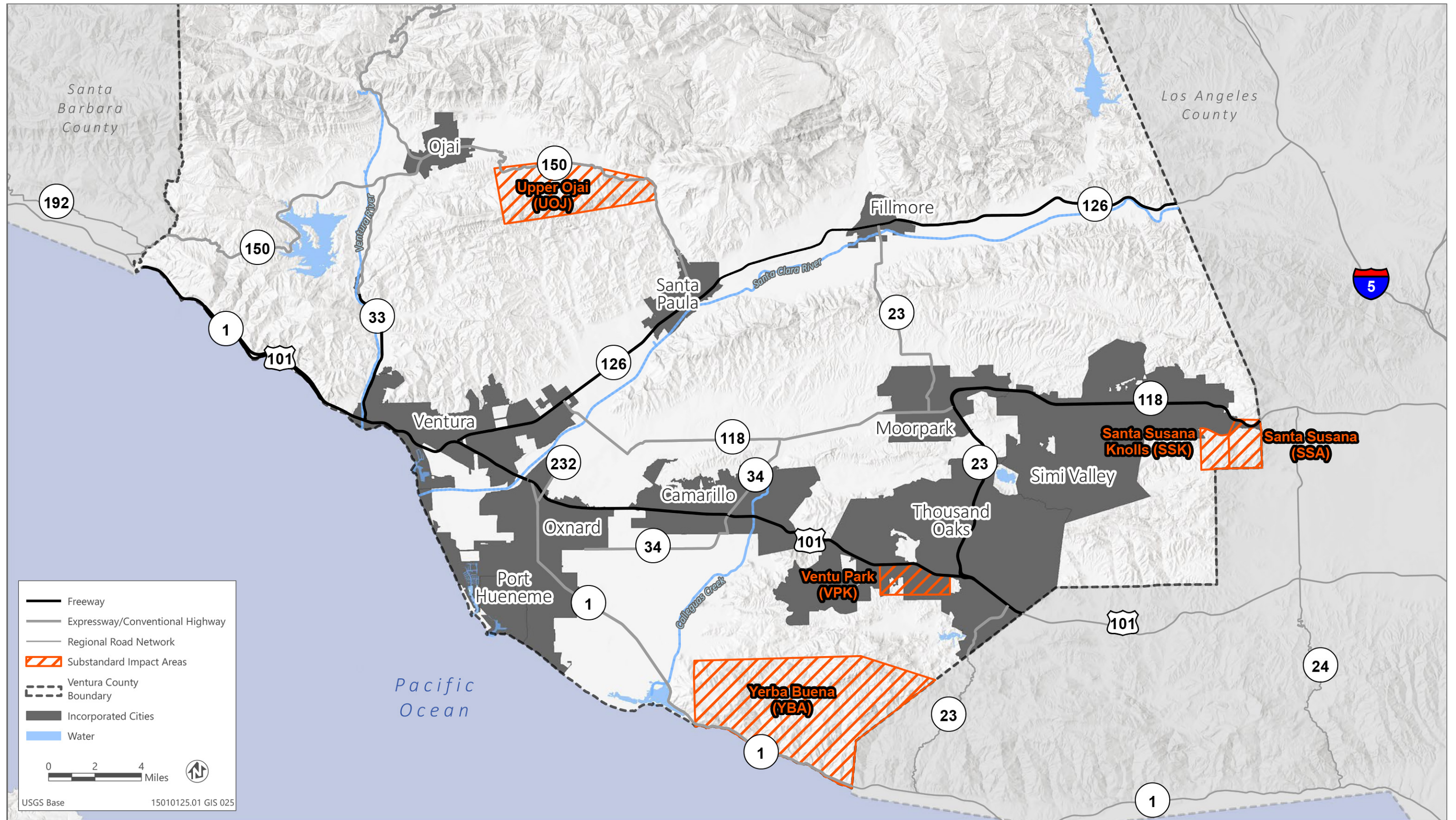
The County of Ventura maintains improvement standards that guide the construction of new transportation facilities to minimize design hazards for all users of the system. Through discretionary development and the environmental review processes, land use proposals that would add traffic to streets not designed to current standards are evaluated. Potential hazards can include poor sight distance, sharp roadway curvature, visibility of marked or unmarked crossings, and similar design conditions. If needed, mitigation measures are identified and the project is conditioned to construct or provide funding for an improvement that would minimize or eliminate the hazard. Typical roadway improvements include shoulder widening, adding turn pockets, adding sidewalks or marked crosswalks, realigning sharp curves, prohibiting certain turning movements, and signaling intersections, among other options. The 2040 General Plan also includes several policies and programs described below that are intended to result in roadway designs that safely accommodate all users and reinforce lower driving speeds where appropriate to enhance safety.

New and upgraded roadways needed to accommodate new development would be designed according to applicable Federal, State, and local design standards, and align with the policies and programs in the proposed 2040 General Plan. Use of and adherence to Complete Streets Policies would ensure that construction of new roadways or improvements to existing roadways minimize design hazards and improve safety for all road users (CTM-2.1; CTM Implementation Program H). Further, requirements of discretionary development to ensure consistency with County standards and commitment to improved multimodal access when constructing access points would assist in mitigating impacts related to geometric design hazards, such as road curvature, impediment to line of sight, etc. (CTM-2.3; LU-16.5).

Planning and design standards would improve safety and minimize impacts associated with geometric design hazard by providing guidance on the planning and design of safe bicycle and pedestrian facilities, consistent with state, federal and industry best-practices and regulations (CTM-2.14; CTM-2.15; CTM-2.16; CTM-2.19; CTM-2.20; CTM-2.21). Moreover, the areas plans included in the 2040 General Plan include policy commitment to road standards compliance, requiring all new roads to be designed and constructed in accordance with County and/or State standards. Lastly, CTM Implementation Program J would ensure the County develops a strategy to reduce fatal and severe traffic crashes by implementing a Vision Zero Program. This would ensure the County effectively measures performance as it relates to crash rates and sets achievable and implementable safety goals that result in improved safety and mobility for all road users on both existing and new roadways.

Thousand Oaks Area Plan – Policy/ Program Revision 4.16-2.2: Encourage support for and the passage of Thousand Oaks Area Plan Implementation Program C: Rural Road Improvements within the Ventu Park Neighborhood. This program requires the County to present a rural road improvement program to the County Board of Supervisors in conjunction with the Ventu Park Homeowners Association. The program would mitigate the effects of some substandard roads within the Ventu Park area, while allowing the Ventu Park neighborhood to maintain its rural community character.

For the reasons provided above, this impact would be **potentially significant**.



Source: Data received from Ventura County in 2016

Figure 4.16-2 Substandard Impact Areas

Mitigation Measures

Mitigation Measure CTM-4: New Implementation Program CTM-X: Updated Traffic Impact Fee Mitigation Program
The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program CTM-X: Updated Traffic Impact Fee Mitigation Program

The County shall require that development which adds traffic to roadways traversing within a County designated substandard roadway impact area contribute the fair share cost of any safety counter-measures that improve the safety of the impacted roadways by paying the applicable fees under the County's Traffic Impact Fee Mitigation program prior to issuance of Zoning Clearance.

Significance after Mitigation

Traffic volume would increase on existing roadways already identified as substandard facilities. Substandard roadways must be improved to meet County road standards to mitigate impact significance. Further, analysis of trips added by discretionary development to roadways identified as facilities with high collision/incidence rates must be explored at the project-level to ensure safety standards are met. No other feasible mitigation is available to eliminate safety concerns associated with the identified substandard roadways. Therefore, this impact would remain **significant and unavoidable**.

Impact 4.16-3: Result in Inadequate Emergency Access

Implementation of the 2040 General Plan would allow for increased development to accommodate projected increases in population, households, and jobs and result in increased numbers of users on the County's transportation system. New trips may affect adequate emergency access and response times by increasing the number of vehicles and demand on the County's existing transportation infrastructure. With these increases in development and number of users on the County transportation system, the need for emergency services would also increase.

To ensure adequate emergency access provisions are made to accommodate increased population and growth, the 2040 General Plan includes Policy CTM-2.5. This policy states that the County shall ensure coordination to develop and maintain all transportation facilities at an emergency service operation and service level that results in adequate emergency access. In the event of a scenario in which military mobilization is required, several policies and programs address the adequacy and effectiveness of military operations, including CTM-1.13, CTM-1.15 and CTM Implementation Program G. These policies and implementation program relate to the feasibility of grade separations and improved circulation within military mobilization corridors to ensure mission operations and readiness.

In addition to the policies and programs outlined in the 2040 General Plan, several of the Area Plans include policies and/ or programs that commit to the continued review of all discretionary development to ensure adequate emergency access, in the form of both fire protection, law enforcement and/ the provision of emergency services (LS-16.4; LS-31.1; LS-31.3; LS-31.5; LS-47.11; OP-40.1; OJ-34.1; P-DD). This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure CTM-5: New Policy CTM-X: Emergency Access

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

Policy CTM-X: Emergency Access

The County shall ensure that all new discretionary projects are fully evaluated for potential impacts to emergency access. Mitigation of these impacts shall be handled on a project-by-project basis to guarantee continued emergency service operations and service levels.

Mitigation Measure CTM-6: New Implementation Program CTM-X: Emergency Access Maintenance

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program CTM-X: Emergency Access Maintenance

The County shall plan capital improvements needed to provide transportation infrastructure that is maintained and/or upgraded to provide appropriate emergency access.

Significance after Mitigation

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. Therefore, this impact would remain **significant and unavoidable**.

Impact 4.16-4: Conflict With Adopted Policies, Plans, or Programs Regarding Public Transit, Bicycle, or Pedestrian Facilities, or Otherwise Decrease the Performance or Safety of Such Facilities

Implementation of the 2040 General Plan would improve the existing bicycle and pedestrian circulation infrastructure in Ventura County and would require future development to provide multimodal circulation improvements. Increases in the County's population and employment that could result under implementation of the 2040 General Plan would also likely lead to increases in pedestrian and bicycle travel compared to current levels.

Several policies place an emphasis on the planning, improvement and funding of safe and accessible bicycle and pedestrian facilities, which would not conflict with existing policies, plans or programs. Further, these policies would result in increased performance of these facilities by encouraging the development and improvement of these facilities (CTM-2.12; CTM-2.16; CTM-2.18; CTM-2.20; CTM-2.21; CTM-2.22; CTM-3.1; CTM-3.2; CTM-3.3; CTM-3.4; CTM-3.5; CTM-3.6; CTM-3.7; CTM-3.8; CTM-3.9). Complete Streets and Bicycle and Pedestrian Facility design policies such as CTM-2.1, CTM-2.14, and CTM-2.15 would ensure that planned improvements do not decrease the performance and/ or safety of active transportation facilities.

New trips and increased VMT may result in an interference with the operations of existing transit services and/ or routes. However, several policies included in the 2040 General Plan address these impacts by encouraging the coordination, expansion and access improvements of public transportation facilities needed to mitigate these impacts, including CTM-2.23 and CTM-2.25. These policies state the County's commitment to expand access and safety of public transportation options that may be affected. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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

Implementation of the 2040 General Plan would be unlikely to allow for development that would significantly interfere with existing railroad facility integrity or operations. However, future development that would result from the 2040 General 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, either temporarily during construction or permanently. It is not anticipated that trips generated by future development allowed under the 2040 General Plan would interfere with existing rail facilities or operations.

The 2040 General Plan includes several policies that encourage facility and service improvements to railroads, passenger rail and railroads/yards as it relates to goods movement. These policies include CTM-1.15, CTM-2.23, and CTM-1.13. However, because project-specific details regarding future development under the 2040 General Plan are not available at this time, potential temporary or permanent interference with railroad facility integrity or operations cannot be precluded at this program level of analysis. Therefore, this impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure CTM-7: New Policy CTM-X: Railroad Safety Assessment

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

Policy CTM-X: Railroad Safety Assessment

The County shall require that all new discretionary development is evaluated for potential impacts to existing railroad facilities and operations and identify appropriate mitigation measures, as warranted therein.

Significance after Mitigation

With implementation of Mitigation Measure CTM-7, which requires review and mitigation of project impacts on railroad facilities and operations, the potential impact is substantially reduced. This impact would be reduced to **less than significant**.

Impact 4.16-6: Substantially Interfere with or Compromise the Operations or Integrity of an Existing Pipeline

Investigation of the type, location, and operations of existing or future pipelines for the 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 project applicants would work with utility owners during design and construction of the project to relocate utilities, abandon the utilities in place, or protect the utilities in place, as required to protect the operations and integrity of the pipelines. Unknown utility facilities could also be encountered during excavation and other earth-moving activities. However, California Government Code Section 4216 requires contractors to contact DigAlert, which notifies utility companies of proposed excavation sites. Utility companies are required to mark where underground pipelines and transmission lines are located, to ensure they are not affected during construction.

Relocations and reinstallation of utilities would be conducted in cooperation with the utility service providers in accordance with design standards and regulatory requirements. Where pipelines that underly or are near proposed development are left in place based on coordination with the utility owner, no effect on operations of the pipeline would be expected. It is common practice that utility districts coordinate and schedule in advance any field visits to their facilities with the owner of the property within which their facilities lie. For additional discussion of the potential for development to conflict with existing utilities, refer to Impact 4.17-1 in Section 4.17, "Utilities."

The Ventura ISAG (Ventura County 2011) require staff to evaluate pipeline locations and operations as part of standard project review. Section 27g. of the ISAG requires County staff to perform the following:

"The County staff person responsible for administering the project shall consult the GIS Oil and Gas Pipeline data layer to determine if the project would be located over a pipeline facility or route. Consistent with the directions of the Federal Office of Homeland Security, the GIS Oil and Gas Pipeline data layer may not be released to the public. If the project is located over such a facility, it will be necessary to contact the appropriate facility owner to discuss the project and determine the potential project impact on the pipeline. If there is any disagreement between the County staff person and pipeline owner/operator, the staff member responsible for administering the project will bring the issue before the Planning Director or the staff member's supervisor, as appropriate, for a determination."

Given the procedures in place to avoid such impacts to pipelines, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

4.17 UTILITIES

This section evaluates the potential effects of implementing the 2040 General Plan on utilities, including water supply, wastewater treatment, solid waste, and gas, electric, and telecommunications infrastructure. As described in the “Approach to the Environmental Analysis” section, above, the following assessment of impacts is based on the characterization of existing environmental conditions and regulatory setting provided in Section 7 of the January 2020 Background Report (Appendix B). Where necessary, each section identifies changes (e.g., new information, regulatory changes) to the environmental and regulatory setting included in the Background Report that are relevant to understanding the 2040 General Plan’s potential impacts.

No comments regarding utilities were received in response to the notice of preparation (NOP). The NOP and comments on the NOP are included in Appendix A.

4.17.1 Background Report Setting Updates

REGULATORY SETTING

In addition to the information provided in Section 7 of the Background Report (Appendix B), the following information is relevant to understanding the potential utilities impacts of the 2040 General Plan:

- ▶ **Ventura County Sewer Policy:** The Ventura County Sewer Policy (Sewer Policy) requires connection to the public sewer for all subdivisions, and for discretionary projects requiring new onsite wastewater treatment systems (OWTS, e.g., “septic systems”) or increasing the volume of sewage on existing OWTSs. For example, a commercial development on a vacant lot is subject to the Sewer Policy. Additionally, a nonresidential project on a site with an existing OWTS that will add building(s) with plumbing or increase the number of employees such that the OWTS will have to be enlarged is also subject to the Sewer Policy. Projects that are the construction of a single-family dwelling, a duplex, and/or second dwelling unit are exempt from the Sewer Policy (but not Building Code which also has prescriptive requirements for connecting to public sewer). If obtaining a public sewer service is not feasible, the County may issue an exemption or waiver from the Sewer Policy.
- ▶ **California Government Code Section 4216:** California Government Code Section 4216 requires consultation with DigAlert, which notifies utility companies of proposed excavation sites.

ENVIRONMENTAL SETTING

In addition to the information provided in the Background Report (Appendix B), the following information is relevant to understanding the potential utilities impacts of the 2040 General Plan:

Wastewater Treatment Capacity

The summary of wastewater service providers has been updated, as provided in Table 4.17-1.

Table 4.17-1 Wastewater Treatment Capacity, Ventura County

Agency	Total Number of Connections	Rated Capacity (MGD ¹)	ADWF ² (MGD)	Treatment Level
County Service Area No. 29	307	N/A	0.085	Tertiary
County Service Area No. 30	274	N/A	0.2	Tertiary
County Service Area No. 32	N/A	N/A	N/A	N/A
County Service Area No. 34	1,364	N/A	N/A	Tertiary
Camarillo Utility Enterprise	57	N/A	0.0356	Tertiary
Todd Road Jail	N/A	0.08	0.044	Secondary
Ventura County Waterworks District No. 1	10,000 (37,000 population)	5	2	Tertiary
Ventura County Waterworks District No. 16	544 (2,000 population)	0.5	N/A	Secondary
Camarillo Sanitary District	70,000 (population, city and unincorporated)	7.25	4	Tertiary
Ojai Valley Sanitary District	20,000 (customers)	3	1.4	Tertiary
Saticoy Sanitary District	271	0.25	0.1	Secondary
Triunfo Sanitation District	12,300	16	9	Tertiary
Camrosa Water District	6,900	1.5	1.4	Tertiary
Channel Islands Beach Community Services District	1,800	N/A	N/A	N/A
City of Oxnard	40,000	32.7	17	Tertiary
City of Simi Valley	40,000 (527 unincorporated)	12.5	7.8	Tertiary
City of Thousand Oaks	130,000 (population)	14	8	Tertiary
City of Ventura	25,528	14	7.1	Tertiary

Notes: N/A= data is not available because the County does not provide sewer service or treatment; MGD=Million Gallons per Day; ADWF= Average Dry Weather Flow.

Source: Appendix B (Table 7-2) with updated service connection numbers from Public Works Agency Water and Sanitation customer database and updated treatment plant levels provided by Joseph Pope, Director, Water and Sanitation Department.

4.17.2 Environmental Impacts and Mitigation Measures

METHODOLOGY

This analysis includes a program-level, qualitative assessment of impacts related to water supply, wastewater, solid waste, and electricity, natural gas, and telecommunications infrastructure. The analysis is qualitative and focuses on existing regulations, standards, and the policies of the 2040 General Plan.

Consideration of wastewater includes a general evaluation of available treatment capacity in the county. This information is used to determine if treatment capacity is generally available for future development under the 2040 General Plan. The assessment of available water supply considers the current regional demand and supply of water based in part on analyses available in current Urban Water Management Plans (UWMPs) for major water providers and available groundwater resources. This information is used to determine if supplies are available for future development under the 2040 General Plan.

The water supplies provided in the UWMPs, groundwater resources information, and estimated demands provided in the Background Report (Appendix B) inform the analysis of where additional demand may exceed the capacity within different watersheds in the county. Impacts related to solid waste are based on the following generation rates compiled by CalRecycle: 10.53 pounds (lbs)/employee/day, assuming commercial employment; and 12.23 lbs/household/day (CalRecycle 2019b). Generation and disposal quantities are assumed to be the same for this analysis and consist of waste that is disposed of at landfills and transformation facilities, or exported from the State.

Water supply assumptions were based on the 2015 UWMP for the Ventura County Waterworks District No. 1, which indicates that residents demand an average of 120 gallons of water per day (Ventura County Waterworks District No. 1. 2016).

THRESHOLDS OF SIGNIFICANCE

As discussed in the “Approach to the Environmental Analysis” section, the thresholds used to determine the significance of the 2040 General Plan’s impacts are based on Ventura County’s adopted Initial Study Assessment Guidelines (ISAG), which include threshold criteria to assist in the evaluation of significant impacts for individual projects. Appendix G of the State CEQA Guidelines also provides considerations for determining the significance of a project’s impacts, in the form of initial study checklist questions.

To develop thresholds of significance for this section of the draft EIR, the County has deviated from the ISAG threshold criteria, where appropriate, to appropriately consider the programmatic nature of a general plan for the entire unincorporated area and to incorporate the 2019 revisions to the Appendix G checklist.

Specifically, ISAG Section 29c, related to solid waste treatment and disposal facilities, has been combined with Appendix G question XIX(d). ISAG Section 30, Threshold 2, which addresses increased demand for gas, electric, and communications facilities, has been combined with Appendix G question XIX(a) to include water supply and wastewater. ISAG Section 30, Threshold 1, related to disruption of existing facilities, is included as a separate threshold. ISAG Section 28b, Threshold 3, regarding water supply, has been combined with Appendix G question XIX(b) to consider whether sufficient water supplies would be available during normal, single-dry, and multiple-dry year scenarios. ISAG Section 28b, Thresholds 1 and 2 address impacts on water supply based on consistency with the existing general plan. Thresholds related to consistency with the Ventura County General Plan Goals, Policies and Programs or applicable Area Plan, are not discussed in this analysis because this draft EIR is an evaluation of an update to the Ventura County General Plan Goals, Policies, and Programs. Area Plans were updated to maintain consistency with the General Plan. Future projects would be required to demonstrate consistency with the 2040 General Plan, and the ISAGs provide for a project-level evaluation of discretionary projects by County staff on a case-by-case basis.

Issues pertaining to groundwater, stormwater drainage, and OWTS are addressed in Section 4.10, “Hydrology and Water Quality.”

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant impact on utilities if it would:

- ▶ Be inconsistent with any applicable water supply quality requirements included in the California Health and Safety Code, California Code of Regulations, Ventura County Building Code, and the NCZO.
- ▶ Be inconsistent with fire flow requirements based on the Ventura County Fire Code and the Ventura County Water Works Manual.
- ▶ Be inconsistent with sewage collection and treatment regulations included in the California Water Code, the California Code of Regulations, Title 22, the California Regional Water Quality Control Board Basin Plans, the California Plumbing Code, and the Ventura County Building Code.
- ▶ Be inconsistent with applicable solid waste facility requirements included in the California Health and safety Code, California Code of Regulations, California Public Resources Code, and Ventura County Ordinance Code.
- ▶ Cause a disruption or rerouting of an existing utility facility.
- ▶ Increase demand on a utility that results in the relocation or construction of new or expansion of existing water, wastewater, electric power, natural gas, or telecommunications infrastructure, resulting in the potential for significant environmental impacts.
- ▶ Result in insufficient water supplies available to serve the plan area during normal, single-dry, and multiple-dry years.
- ▶ Result in inadequate wastewater treatment capacity to serve the 2040 General Plan's projected demand, in addition to the provider's existing commitments.
- ▶ Result in a direct or indirect adverse effect on a landfill's disposal capacity, such that it reduces its useful life to less than 15 years or is not consistent with federal, State, and local management and reduction statutes related to solid waste.

ISSUES NOT DISCUSSED FURTHER

The Area Plans for communities of El Rio/Del Norte, Lake Sherwood, North Ventura Avenue, Oak Park, Ojai, Piru, and Thousand Oaks were reviewed for policies and implementation programs specific to these Area Plans that would potentially have impacts on the environment with respect to utilities. The 2040 General Plan would not result in substantive changes to Area Plan policies and implementation programs related to utilities. The Area Plan goals and policies related to these issues are consistent with the 2040 General Plan policies and implementation programs, which are addressed in the following discussions. Therefore, the environmental effects of the Area Plan policies and implementation programs are not addressed separately in this section.

Water Supply - Quality

Future development under the 2040 General Plan would be required to be consistent with all applicable water supply quality requirements for the California Health and Safety Code,

California Code of Regulations, Ventura County Building Code, and Ventura County Ordinance Code. Therefore, issues related to water supply quality requirements are not addressed further.

Water Supply - Fire Flow Requirements

Future development under the 2040 General Plan would be required to be consistent with fire flow requirements based on the Ventura County Fire Code and the Ventura County Water Works Manual, the latter of which requires proof of water availability for fire flow. Therefore, issues related to fire flow requirements are not addressed further.

Waste Treatment and Disposal Facilities - Sewage Collection/Treatment Facilities

Future development under the 2040 General Plan would be consistent with sewage collection and treatment regulations included in the California Water Code, the California Code of Regulations, Title 22, the California Regional Water Quality Control Board Basin Plans, the California Plumbing Code, and the Ventura County Building Code. Therefore, issues related to sewage collection and treatment regulations are not addressed further.

Waste Treatment and Disposal Facilities - Solid Waste Facilities

Future development under the 2040 General Plan would be required to be consistent with applicable solid waste facility requirements included in the California Health and safety Code, California Code of Regulations, California Public Resources Code, and Ventura County Ordinance Code. Therefore, issues related to solid waste facility requirements are not addressed further.

2040 GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAMS

Policies and implementation programs in the 2040 General Plan related to utilities and, specifically, the thresholds of significance identified above, include the following.

Public Facilities, Services, and Infrastructure Element

- ▶ **Policy PFS 1.7: Public Facilities, Services, and Infrastructure Availability.** The County shall only approve discretionary development in locations where adequate public facilities, services, and infrastructure are available and functional, under physical construction, or will be available prior to occupancy. (RDR) *[Source: Existing GPP Policy 4.1.2.2]*
- ▶ **Policy PFS-4.1: Wastewater Connections Requirement.** The County shall require development to connect to an existing wastewater collection and treatment facility if such facilities are available to serve the development. An onsite wastewater treatment system shall only be approved in areas where connection to a wastewater collection and treatment facility is deemed unavailable. (RDR) *[Source: Ventura County Sewer Policy, and Existing GPP Policy 4.4.2.1, modified]*
- ▶ **Policy PFS-4.5: Onsite Water Reuse.** The County shall encourage on-site water reuse for landscape irrigation and groundwater recharge consistent with health standards, to reduce demand for potable water, and increase drought and disaster resiliency. (SO, RDR) *[New Policy]*
- ▶ **Policy PFS-4.6: Reclaimed Water.** The County shall encourage public wastewater system operators to upgrade existing wastewater treatment systems to reclaim water suitable for reuse for landscaping, irrigation, and groundwater recharge. (SO, IGC) *[Source: New Policy]*

- ▶ **Policy PFS-4.7: Design to Minimize Inflow/Infiltration.** The County shall require that new wastewater lateral and trunk collection lines be designed to allow the minimum feasible amount of inflow and infiltration into the wastewater collection system. (RDR) [Source: Existing GPP Policy 4.4.2.3]
- ▶ **Policy PFS-5.3: Solid Waste Capacity.** The County shall require evidence that adequate capacity exists within the solid waste system for the processing, recycling, transmission, and disposal of solid waste prior to approving discretionary development. (RDR) [Source: New Policy]
- ▶ **Policy PFS-5.4: Solid Waste Reduction.** The County shall support and promote solid waste reduction, recycling, and composting efforts, including food waste reduction in cases where consumable food can be redistributed rather than disposed. (SO) [Source: New Policy]
- ▶ **Policy PFS-5.5: Agricultural Waste Reuse.** The County shall support the beneficial reuse of agricultural wastes for activities such as composting and energy generation. (RDR, SO) [Source: New Policy]
- ▶ **Policy PFS-5.6: Value-Added Alternatives to Waste Disposal.** The County shall promote value-added alternatives to solid waste management, such as compost, energy, biochar, and wood products to avoid open burning of agricultural biomass wastes. (SO, PI) [Source: New Policy]
- ▶ **Policy PFS-5.9: Waste Reduction Practices for Discretionary Development.** The County shall encourage applicants for discretionary development to employ practices that reduce the quantities of wastes generated and engage in recycling activities to further reduce the volume of waste disposed of in landfills. (RDR, SO) [Source: Existing GPP Policy 4.4.2.6]
- ▶ **Policy PFS-7.1: Accessible Public Utilities.** The County shall work with utility companies and service providers to ensure that gas, electric, broadband, cellular mobile communications, cable television, and telephone utility transmission lines are located appropriately to provide for adequate services throughout the unincorporated area. (JP) [Source: New Policy]
- ▶ **Policy PFS-7.5: Broadband Service Access.** The County shall encourage broadband service providers to expand service areas and provide high quality access to broadband (high-speed internet) and cellular mobile communications services to residents and businesses, including unserved and underserved areas. (JP) [Source: New Policy]

Implementation Programs

- ▶ **Implementation Program A: Infrastructure Improvements and Funding.** The County shall prepare, adopt, and periodically update capital improvement programs for all County-owned and operated facilities and services to maintain adequate levels of service and consistency with the General Plan. [Source: New Program]
- ▶ **Implementation Program H: Ventura County Sewer Policy.** The County shall maintain a policy regarding the requirements and exemptions related to the connection to a wastewater treatment system. [Source: New Program, Ventura County Sewer Policy]

- ▶ **Implementation Program L: Food Waste Reduction.** The County shall provide educational and informational materials to restaurants, grocery stores, and other food providers, as part of food handler permitting, to support donation of safe, unused food to non-profit service agencies. *[Source: New Program]*

Water Resources Element

- ▶ **Policy WR-1.1: Sustainable Water Supply.** The County should encourage water suppliers, groundwater management agencies, and groundwater sustainability agencies to inventory and monitor the quantity and quality of the county's water resources, and to identify and implement measures to ensure a sustainable water supply to serve all existing and future residents, businesses, agriculture, government, and the environment. (IGC, SO) *[Source: Existing GPP Goal 1.3.1.1 and Lake Sherwood/Hidden Valley Area Plan Goal 4.2.1.1, modified]*
- ▶ **Policy WR-1.2: Watershed Planning.** The County shall consider the location of a discretionary project within a watershed to determine whether or not it could negatively impact a water source. As part of discretionary project review, the County shall also consider local watershed management plans when considering land use development. (MPSP, RDR) *[Source: New Policy]*
- ▶ **Policy WR-1.3: Portfolio of Water Sources.** The County shall support the use of, conveyance of, and seek to secure water from varied sources that contribute to a diverse water supply portfolio. The water supply portfolio may include, but is not limited to, imported water, surface water, groundwater, treated brackish groundwater, desalinated seawater, recycled water, and stormwater where economically feasible and protective of the environmental and public health. (IGC) *[Source: New Policy]*
- ▶ **Policy WR-1.4: State Water Sources.** The County shall continue to support the conveyance of, and seek to secure water from, state sources. (IGC) *[Source: New Policy]*
- ▶ **Policy WR-1.5: Agency Collaboration.** The County shall participate in regional committees to coordinate planning efforts for water and land use that is consistent with the Urban Water Management Planning Act, Sustainable Groundwater Management Act, the local Integrated Regional Water Management Plan, and the Countywide National Pollutant Discharge Elimination System Permit (stormwater and runoff management and reuse). (IGC) *[Source: New Policy]*
- ▶ **Policy WR-1.6: Water Supplier Cooperation.** The County shall encourage the continued cooperation among water suppliers in the county, through entities such as the Association of Water Agencies of Ventura County and the Watersheds Coalition of Ventura County, to ensure immediate and long-term water needs are met efficiently. (IGC) *[Source: Existing GPP Goal 4.3.1.3, modified]*
- ▶ **Policy WR-1.7: Water Supply Inter-Ties.** The County shall encourage the continued cooperation among water suppliers in the county, through entities such as Association of Water Agencies of Ventura County and the Watersheds Coalition of Ventura County, to establish and maintain emergency inter-tie projects among water suppliers. (IGC) *[Source: New Policy]*

- ▶ **Policy WR-1.8: Water Supplier Consolidation.** The County shall encourage the consolidation of water suppliers where necessary to ensure all residents are receiving water of adequate quality and quantity, to promote management efficiencies, and to encourage sharing of local resources and enhancement of managerial and technical expertise and capacity. (IGC) [*Source: New Policy*]
- ▶ **Policy WR-1.9: Groundwater Basin Use for Water Storage.** Where technically feasible, the County shall support the use of groundwater basins for water storage. (IGC) [*Source: New Policy*]
- ▶ **Policy WR-1.10: Integrated Regional Water Management Plan.** The County shall continue to support and participate with the Watersheds Coalition of Ventura County in implementing and regularly updating the Integrated Regional Water Management Plan. (IGC) [*Source: New Policy*]
- ▶ **Policy WR-1.11: Adequate Water for Discretionary Development.** The County shall require all discretionary development to demonstrate an adequate long-term supply of water. (RDR) [*Source: Existing GPP Policy 4.3.2.1, modified*]
- ▶ **Policy WR-1.14: Discretionary Development and Conditions of Approval – Golf Course Irrigation.** The County shall require that discretionary development for new golf courses shall be subject to conditions of approval that prohibit landscape irrigation with water from groundwater basins or inland surface waters identified as Municipal and Domestic Supply or Agricultural Supply in the California Regional Water Quality Control Board's Water Quality Control Plan unless:
 - The existing and planned water supplies for a Hydrologic Area, including interrelated Hydrologic Areas and Subareas, are shown to be adequate to meet the projected demands for existing uses as well as reasonably foreseeable probable future uses within the area; and
 - It is demonstrated that the total groundwater extraction/recharge for the golf course will be equal to or less than the historic groundwater extraction/recharge for the site as defined in the County Initial Study Assessment Guidelines.

Further, where feasible, reclaimed water shall be utilized for new golf courses. (RDR) [*Source: Existing GPP Policy 1.3.2.10, modified*]

- ▶ **Policy WR-3.1: Non-Potable Water Use.** The County shall encourage the use of non-potable water, such as tertiary treated wastewater and household graywater, for industrial, agricultural, environmental, and landscaping needs consistent with appropriate regulations. (RDR) [*Source: Existing GPP Goal 1.3.1.6, modified*]
- ▶ **Policy WR-3.2: Water Use Efficiency for Discretionary Development.** The County shall require the use of water conservation techniques for discretionary development, as appropriate. Such techniques include low-flow plumbing fixtures in new construction that meet or exceed the state Plumbing Code, use of graywater or reclaimed water for landscaping, retention of stormwater runoff for direct use and/or groundwater recharge, and landscape water efficiency standards that meet or exceed the standards in the California Model Water Efficiency Landscape Ordinance. (IGC, RDR) [*Source: New Policy*]

- ▶ **Policy WR-3.3: Low-Impact Development.** The County shall require discretionary development to incorporate low impact development design features and best management practices, including integration of stormwater capture facilities, consistent with County's Stormwater Permit. (RDR) *[Source: NBVC JLUS, Strategy BIO-1A]*
- ▶ **Policy WR-3.4: Reduce Potable Water Use.** The County shall strive for efficient use of potable water in County buildings and facilities through conservation measures, and technological advancements. (SO) *[Source: New Policy]*
- ▶ **Policy WR 4.1: Groundwater Management.** The County shall work with water suppliers, water users, groundwater management agencies, and groundwater sustainability agencies to implement the Sustainable Groundwater Management Act (SGMA) and manage groundwater resources within the sustainable yield of each basin to ensure that county residents, businesses, agriculture, government, and the environment have reliable, high-quality groundwater to serve existing and planned land uses during prolonged drought years. (IGC, RDR, SO) *[Source: New Policy]*
- ▶ **Policy WR 4.2: Important Groundwater Recharge Area Protection.** In areas identified as important recharge areas by the County or the applicable Groundwater Sustainability Agency, the County shall condition discretionary development to limit impervious surfaces where feasible and shall require mitigation in cases where there is the potential for discharge of harmful pollutants within important groundwater recharge areas. (IGC, RDR) *[Source: New Policy]*
- ▶ **Policy WR 4.3: Groundwater Recharge Projects.** The County shall support groundwater recharge and multi-benefit projects consistent with the Sustainable Groundwater Management Act and the Integrated Regional Water Management Plan to ensure the long-term sustainability of groundwater. (IGC, RDR, SO) *[Source: New Policy]*
- ▶ **Policy WR 4.4: In-Stream and Recycled Water Use for Groundwater Recharge.** The County shall encourage the use of in-stream water flow and recycled water for groundwater recharge while balancing the needs of urban and agricultural uses, and healthy ecosystems, including in-stream waterflows needed for endangered species protection. (RDR) *[Source: New Policy]*
- ▶ **Policy WR 4.5: Discretionary Development Subject to CEQA Statement of Overriding Considerations – Water Quantity and Quality.** The County shall require that discretionary development shall not significantly impact the quantity or quality of water resources within watersheds, groundwater recharge areas or groundwater basins. (RDR) *[Source: Existing GPP Policy 1.3.2.4, modified]*

Implementation Programs

- ▶ **Implementation Program F: Discretionary Development Review for Adequate Water and Wastewater.** The County shall verify that all discretionary development proposals demonstrate an adequate long-term supply of water, adequate methods for sewage disposal, provide adequate drainage to avoid flooding, prevent erosion, and prevent contamination of local water. *[Source: New Program]*

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 4.17-1: Cause a Disruption or Rerouting of an Existing Utility Facility

The proposed land use diagram of the 2040 General Plan would accommodate future development of relatively higher intensity residential, commercial, mixed use, and industrial land uses within the Existing Community area designation (boundary) and the Urban area designation (boundary). These are areas with existing residential, commercial, and/or industrial uses developed with urban building intensities generally located adjacent to the boundaries of incorporated cities or along highway corridors such as SR 33, SR 118, SR 126, and Highway 101. The residential, commercial, mixed use, and industrial land use designations of the 2040 General Plan would apply to approximately 1.2 percent of land in the unincorporated county. Potential uses within these designations include small- and large-lot detached single-family homes, one- to three-story attached single-family dwellings and lower density multifamily developments, mixes of commercial, office, residential, civic, and/or recreational uses, one- to two-story structures for retail and commercial services, and industrial employment-generating uses, such as production, assembly, warehousing, and distribution.

The Rural land use designation would allow for low-density and low-intensity land uses such as residential estates and other rural uses which are maintained in conjunction with agricultural and horticultural uses or in conjunction with the keeping of farm animals for recreational purposes, such as greenhouses, principal and accessory structures related to agriculture, and also oil and gas wells, and would apply to approximately 0.9 percent of land in the unincorporated county.

Approximately 97.1 percent of the unincorporated county would remain designated as either Open Space (approximately 88 percent) or Agriculture (approximately 9 percent) under the 2040 General Plan. The Open Space land use designation would allow low intensity development with a minimum parcel size of 10 acres and 1 dwelling unit per parcel. Other uses could include composting operations, greenhouses, correctional institutions, fire stations, and oil and gas wells. The Agriculture land use designation would allow for development of one dwelling unit per parcel and a minimum parcel size of 40 acres. Other uses could include greenhouses, principal and accessory structures related to agriculture, and composting operations. Proposed policies of the 2040 General Plan addressing flaring and trucking associated with new discretionary oil and gas wells could result in the construction and operation of new pipelines for the conveyance of oil, gas, or produced water.

As described above, future development under the 2040 General Plan could include new housing, commercial and industrial businesses, and other uses, which would require extension of utility facilities such as pipelines and powerlines to provide utility services. During construction, relocation of facilities and extension of existing supply lines could temporarily cause a disruption of service while connections are being completed. Unknown utility facilities could also be encountered during excavation and other earth-moving activities, which may affect provisions of water, wastewater, gas, electric, and telecommunication services. However, California Government Code Section 4216 requires contractors to contact DigAlert, which notifies utility companies of proposed excavation sites. Utility companies are required to mark where underground pipelines and transmission lines are located, to ensure they are not affected during construction.

Further, all utility connections would be constructed in accordance with all applicable building codes and applicable standards governing construction of utility infrastructure to ensure adequately sized and properly constructed systems. For instance, the California Public Utilities Commission (CPUC) is responsible for assuring California utility customers have safe, reliable utility services and regulates the planning and approval for the physical construction of electric generation, transmission, or distribution facilities; and the local pipelines of natural gas (CPUC Decision 95-08-038). In addition, design and construction standards for wastewater and water systems are provided in the Ventura County Sewerage Manual and the Waterworks Manual. Any necessary connections would be constructed before occupancy and in a manner that would minimize the potential for utility service disruption of existing uses. Thus, future development under the 2040 General Plan would not cause a substantial disruption or rerouting of utility facilities and this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

Impact 4.17-2: Increase Demand on a Utility that Results in the Relocation or Construction of New, or Expansion of Existing Water, Wastewater, Electric Power, Natural Gas, or Telecommunications Infrastructure, Resulting in the Potential for Significant Environmental Impacts

Future development that could be accommodated under the 2040 General Plan is described in Impact 4.17-2. Policies included in the 2040 General Plan limit approval of discretionary development to locations where adequate public facilities, services, and infrastructure are available and functional, before occupancy (PFS-1.7). This includes coordination between the County and utility companies and service providers to ensure that gas, electric, and communication services (broadband, cellular mobile communications, cable television, and telephone utility transmission lines) are located appropriately to provide for adequate services (PFS-7.1 and PFS-7.5). Similarly, the 2040 General Plan requires adequate provision of water supply for discretionary development (WR-1.11) and connections to existing wastewater collection and treatment facilities, if available (PFS-4.1). To maintain adequate levels of services, the County would be required to prepare, adopt, and periodically update capital improvement programs for all County-owned and operated facilities (PFS Implementation Program A).

Moreover, the Ventura LAFCo's authority to regulate the jurisdictional boundaries of public agency service providers helps to ensure that adequate water and wastewater service capacity is available to serve future development. Finally, the 2040 General Plan is consistent with the Guidelines for Orderly Development, which require unincorporated urban development to be located within Existing Community area designation (boundary) and Urban area designation (boundary). Concentrating future development within these areas already served by existing utilities limits the need for expansions or extensions of urban services. Thus, through compliance with the policies and implementation programs of the 2040 General Plan, future development could result in new or expanded water supply, wastewater, electric power, natural gas, and telecommunication infrastructure. This could include extension or upgrades to water supply conveyance, distribution, treatment and surface water or groundwater storage infrastructure; electricity generation, transmission, and distribution infrastructures; natural gas lines, and telecommunication towers.

Utility suppliers periodically prepare master plans for water and wastewater and would anticipate the need for increased service levels as part of their regular planning process. Likewise, electricity and gas companies prepare load forecasts to ensure the reliability of service. As future development under the 2040 General Plan would occur over an approximately 20-year period, the improvements to public utility infrastructure would be constructed in a coordinated manner concurrent with increases in projected demand.

The potential physical environmental impacts resulting from the construction of new or expanded utility infrastructure within the county are evaluated throughout this draft EIR within the programmatic scope of growth and future development accommodated by the 2040 General Plan. The physical environmental impacts that would result from development of new or expanded utility infrastructure are similar to the impacts of other types of future development that would be accommodated by the 2040 General Plan (e.g., air quality, noise, water quality). Each of these environmental impact areas have been evaluated throughout this draft EIR, and in some cases, these impacts would result in potentially significant impacts. Therefore, this impact would be **potentially significant**.

Mitigation Measures

The construction of new or expanded utility infrastructure could result in the types of potential adverse physical changes to the environment already evaluated and identified throughout this draft EIR. Where impacts are potentially significant, the draft EIR identifies potentially feasible mitigation measures to avoid or substantially lessen the impact. As a result, no additional mitigation measures are identified in this section to address the potentially significant impacts of constructing new or expanded utility infrastructure.

Significance after Mitigation

This draft EIR includes a programmatic evaluation of potential adverse physical changes to the environment as a result of forecasted growth and future development under the 2040 General Plan, which includes the construction of new or expanded utility infrastructure to serve this growth and development. These environmental impacts are analyzed in Sections 4.1 through 4.17 of this draft EIR. As discussed herein, future development would be subject to applicable laws and regulations, the policies and implementation programs in the 2040 General Plan, and mitigation measures identified throughout this draft EIR. The adverse physical impacts associated with construction of new or expanded utility infrastructure would be consistent with the impacts of the types of development evaluated in this draft EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases, mitigation measures would reduce impacts to less than significant; in other cases impacts would remain significant and unavoidable after mitigation. Because not all potentially significant impacts of the 2040 General Plan can be reduced to less than significant, and some significant and unavoidable impacts would result, the impact of constructing new or expanded utility infrastructure in response to increased demand under the 2040 General Plan would be **significant and unavoidable**.

Impact 4.17-3: Result in Inadequate Wastewater Treatment Capacity to Serve Future Demand, in Addition to the Provider's Existing Commitments

As discussed in the Background Report, the county is served by 16 wastewater collection, treatment, recycling, and disposal service providers, consisting of the County, county services areas, special districts, cities, and contract entities. The number of available connections and remaining capacity of the wastewater treatment systems varies among the service providers.

As indicated in Table 4.17-1, additional treatment capacity is generally available throughout the county with the exception of Camrosa Water District, which is nearing capacity.

As required by the Ventura County Sewer Policy, 2040 General Plan Policy PFS-4.1, and PFS Element Implementation Program H, development must be connected to an existing wastewater collection and treatment facility, unless the County determines that a connection is not feasible (i.e., too far from the nearest sewer main and service area). The Ventura County Building Code also contains sewer connection requirements. Because connection to wastewater collection and treatment facilities is generally required with new development in Ventura County, growth of residential and commercial areas allowed under the 2040 General Plan would increase wastewater connections. The location of new residential and commercial areas, the associated wastewater flows, and the applicable wastewater treatment collection and treatment facility that would accommodate new flows is unknown. It is not possible to determine how and where future development under the 2040 General Plan would change wastewater flows throughout the county without site-specific information, which is not available.

Various policies included in the 2040 General Plan would result in improved water management throughout the county (see Impact 4.17-4), which could limit the increase in new wastewater flows in the county related to future development. This would be primarily achieved through actions that would improve water use efficiency. For instance, WR-3.4, encourages the efficient use of potable water in County buildings and facilities. Policies also provide consideration of terms for approval of discretionary development that could also include water conservation components, including use of reclaimed water and low-flow plumbing fixtures (WR-3.2) and low-impact development (WR-3.3). In addition, 2040 General Plan Policy PFS-4.7 requires new wastewater lateral and trunk collection lines to be designed to allow the minimum feasible amount of inflow and infiltration into the wastewater collection system. These policies would provide for improved management of wastewater flows relative to the existing conditions.

Wastewater treatment facilities are subject to the National Pollutant Discharge Elimination System (NPDES) permit program, which protects the beneficial uses of surface water that could be used for drinking, fishing, swimming, agriculture, and other activities. The NPDES permitting, which also includes waste discharge requirements [WDRs] under State law, provides limitations on daily treatment and flows, as well as the allowable concentrations or total loads of various constituents of concern found in treated effluent to protect public health. Effluent treatment facilities must be constructed and operated to meet the WDRs. The agency responsible for effluent quality is charged with determining flows that can be accepted. Furthermore, Water Element Implementation Program F requires that all discretionary development proposals demonstrate adequate methods for sewage disposal. Thus, because implementation of the 2040 General Plan policies and implementation programs, and NPDES permitting requirements would require adequate wastewater services to be provided to new development, this impact would be **less than significant**.

Mitigation Measures

No mitigation would be required.

Impact 4.17-4: Result in Development That Would Adversely Affect Water Supply Quantities during Normal, Single-Dry, and Multiple-Dry Years

Adequate water supply is a current and ongoing concern in Ventura County, due to several related factors that include climate change and drought, the related declines in river flows and reservoir levels, historic overdraft of several local groundwater basins, curtailment of groundwater supplies in southern Ventura County, new groundwater well prohibitions, and reduced deliveries of imported water. As described in the Background Report, water supplies can be generally categorized into four watersheds: Ventura River Watershed, Cuyama Watershed, Santa Clara River Watershed, and Calleguas Creek Watershed. (The small portion of the Malibu Creek Watershed that falls in Ventura County is included with information on the Calleguas Creek Watershed for the purposes of this document.) These watersheds are described in more detail below.

Ventura River Watershed

Within the Ventura River Watershed, there are five major water suppliers and 11 mutual water companies. The major urban suppliers provide water to the cities of Ojai and Ventura and portions of the unincorporated county. The 11 mutual water companies provide water almost exclusively to residents and business in the unincorporated county. The major surface water features in the Ventura River Watershed are the Matilija Reservoir, Lake Casitas, and Ventura River. There are four major groundwater basins within the Ventura River Watershed: the Upper Ojai, Ojai Valley, Upper Ventura River, and Lower Ventura River. Total surface and groundwater supplies (37,700 – 44,400 acre-feet) generally exceed demand by a minimum of 5,00 acre-feet annually (see Table 4.17-2).

Cuyama Watershed

Water supplies within the Cuyama Watershed are limited to groundwater, which is primarily used for irrigation. The California Department of Water Resources (DWR) has categorized the groundwater basin that underlies the Cuyama Watershed, the Cuyama Groundwater Basin, as being in “critical overdraft” and a groundwater sustainability agency is being formed (Appendix B). The designation of critical overdraft indicates that water supplies are limited.

Santa Clara Watershed

Water is distributed throughout the Santa Clara Watershed among six municipal water districts and 74 smaller water systems and irrigation companies. The Santa Clara River Watershed contains two major surface water features: Lake Piru Reservoir and Santa Clara River, and is underlain by the Santa Clara River Valley groundwater basin. The Ventura County Watershed Protection District contracts with DWR for a State Water Project (SWP) allocation of 20,000 AF. The amount of SWP water allocated in each year depends on availability, and delivery is only allowed from November 1 through the end of February. The SWP contract expires in 2035, but negotiations are underway to extend the contract. To supplement water supplies, UWCD has periodically entered into annual agreements with Casitas Municipal Water District and the City of Ventura to purchase a portion of their unused SWP allocation; and the City of Oxnard purchases imported water from Calleguas Municipal Water District. In addition, recycled water is produced and delivered by the Cities of Fillmore, Oxnard, and Ventura. Depending on water available during a given year, water demands may exceed supplies within the Santa Clara River Watershed (Table 4.17-2).

Calleguas Creek Watershed

There are nine major water suppliers (entities serving more than 1,000 persons) in the Calleguas Creek Watershed as well as 52 smaller water systems and irrigation companies.

Within the Calleguas Creek Watershed, the major surface water features in the watershed are Lake Bard, the Arroyo Simi/Arroyo Las Posas/Calleguas Creek system, Conejo Creek system, and Honda Barranca/Beardsley Wash/Revolon Slough system. There are multiple groundwater basins within the Calleguas Creek Watershed, including: Pleasant Valley Basin, Arroyo Santa Rosa, Las Posas Valley, Simi Valley, Tapo/Gillibrand, and Tierra Rejada. Several smaller basins also exist in the watershed but provide only a minor amount of supply due to low production or poor water quality (less than 500 AFY each basin).

As indicated below in Table 4.17-2, existing water supplies in Ventura County are limited and demand may exceed supplies in some areas of the county.

Table 4.17-2 Existing Water Supplies and Demands

Watershed	Municipal Water Suppliers	Other Water Suppliers	Water Supplies	Annual Water Demand
Ventura River	Casitas Municipal Water District Ventura Water Golden State Water Company Ventura River Water District Meiners Oaks Water District	11 mutual water companies	23,051 AF Surface Water 14,600 to 21,300 AF Groundwater (37,700 – 44,400 AF total)	32,700 AF
Cuyama	None	None	22,000 AF	10,000 AF agriculture/8 AF domestic
Santa Clara River	Castaic Lake Water Agency City of Fillmore City of Oxnard City of Santa Paula United Water Conservation District Ventura Water	74 smaller water systems and irrigation companies	12,000 AF Imported Water 10,200 to 19,700 AF Recycled Water 136,400 to 171,000 AF Groundwater (158,400 – 202,700 AF Total)	182,600 AF
Calleguas Creek	Calleguas Municipal Water District City of Simi Valley/Ventura Co. Waterworks City of Oxnard City of Thousand Oaks City of Camarillo Port Hueneme Water Agency Camrosa Water District Ventura County Waterworks District No. 1 Ventura County Waterworks District No. 19 Triunfo Water and Sanitation District California American Water Company – Ventura District California Water Service Company – Westlake District Golden State Water Company – Simi Valley Pleasant Valley Mutual Water Company Crestview Mutual Water Company Zone Mutual Water Company	52 small water systems and irrigation companies	11,324 AF Surface Water 119,417 AF Imported Water 13,931 Recycled Water 51,300 to 82,300 AF Groundwater (196,000 – 227,000 AF total)	224,660 AF ¹

Note: AF=acre-feet.

1: Calleguas Municipal Water District imports water into the watershed through the State Water Project to meet basin demand in most years.

Source: Appendix B

Future development under the 2040 General Plan would increase water demand. The 2040 General Plan is anticipated to accommodate a population increase of 4,099 people and increase in employment of 2,986 jobs from 2015 through 2040.

For the plan area, water demand related to population growth would be approximately 491,900 gallons per day (approximately 550 acre feet per year), assuming a use rate of 120 gallons per day per capita. Industrial and commercial development would also increase water demand in the county. While the exact location of new development is unknown, based on the planned land use diagram it is reasonable to assume that it would primarily occur within the southern portion of the county overlying the Ventura River, Santa Clara River, and Calleguas Creek Watersheds near to existing urban development (e.g., incorporated cities). As discussed above and indicated in Table 4.17-2, water supplies are limited throughout these watersheds. Depending on the location of future development, adequate water supplies may not be available to meet future water demands under normal, single-dry, and multiple-dry year scenarios. New or expanded existing water supply infrastructure could be required to serve forecasted growth and future development with adequate water supplies. Examples include new or expanded conveyance pipelines to import water, including from State water sources, surface or groundwater storage, treatment facilities, facilities for the treatment, distribution, and storage of reclaimed water, and desalination facilities. Water conservation and efficiency measures, such as low-flow fixtures, drip irrigation, and native landscaping, could also be employed to serve future development and forecasted growth with adequate water supplies. Refer to Impact 4.17-2 for discussion of physical environmental impacts associated with constructing new or expanded utility infrastructure, including water supply conveyance, treatment, distribution, and storage infrastructure to serve future development and forecasted growth with adequate water supplies.

The Ventura County Waterworks Manual (VCWWM) includes standards to address water availability for land development projects. Per VCWWM Section 1.3.6, water purveyors that serve or plan to serve any land development project which is subject to any approval by the County or a County-dependent special district must prepare a letter, known as a water availability letter (WAL), declaring that the purveyor's water system has the necessary water capacity available to supply the domestic and firefighting requirements for the project or service area (PWA 2014). Receipt and acceptance of a WAL by the County is a prerequisite to a water purveyor issuing additional "will serve" letters (WSLs). A WSL is an agreement between a county resident and a water purveyor to provide water service. A WSL approved by the County Public Works Agency (PWA) is required for a property owner to obtain a building permit from the County. The WAL must be signed by a member of the purveyor's Board of Directors or General Manager and contain, among other things: maximum day average water demand, required domestic water storage volume, and number of water service connections. In the case of water purveyors classified as Urban Water Suppliers under the Urban Water Management Planning Act, the adoption of a current UWMP that has been accepted by the State Department of Water Resources satisfies the requirement for submission to and acceptance by the County of a WAL. The WAL requirement was implemented by the County to avoid incremental issuance of WSLs for additional services that would add connections to existing water systems without taking into account the cumulative effect of all previous additions (PWA 2019). Review of WSLs includes a verification of available connections and the water purveyor's ability to provide service. (Note that part of the project planning process includes a determination of fire flow requirements. The water district cannot issue a WSL without demonstration of sufficient fire flow.)

If either of the two above requirements are met, then a WSL may be submitted to the County PWA for review.

In addition to the existing VCWWM requirements to address water availability through WALs and WSLs for land development projects, the 2040 General Plan includes policies to address potential water supply shortfalls, that would strengthen water management in the county through improved water efficiency, planning efforts, and guidance for consideration of discretionary projects. Policies included in the 2040 General Plan that would guide improved water efficiency include encouraging the use of reclaimed water (PFS-4.6), encouraging on-site water reuse for landscape irrigation and groundwater recharge (PFS-4.5), encouraging use of groundwater basins for water storage where feasible (WR-1.9), using non-potable water for industrial, agricultural, environmental, and landscaping water needs (WR-3.1), striving for efficient use of potable water in County buildings and facilities (WR-3.4), supporting implementation of groundwater recharge projects (WR 4.3 and 4.4), and protection of groundwater recharge areas (WR 4-2). These actions would essentially increase available water supply, which could offset some demand throughout the county, depending on where conservation activities occur, the location of future demand, and how it would affect a particular water supplier.

Policies included in the 2040 General Plan also encourage coordinated planning efforts related to ensuring availability of adequate water supplies in the county, including: sustainable water supply plans for water suppliers and groundwater agencies (WR-1.1); development of a diverse water supply portfolio (WR-1.3); participation in regional planning committees to coordinate planning efforts for water and land use (WR-1.5); and continued support and participation with the Watersheds Coalition of Ventura County in implementing and updating the Integrated Regional Water Management Plan (WR-1.10). In addition, policies encourage coordination with water suppliers, water users, groundwater management agencies, and groundwater sustainability agencies to implement the Sustainable Groundwater Management Act (WR-4.1) (see Section 4.10, "Hydrology and Water Quality," for more information related to groundwater). The 2040 General Plan encourages the continued cooperation among water suppliers in the county, through entities such as the Association of Water Agencies of Ventura County and the Watersheds Coalition of Ventura County. This cooperation is aimed to ensure: immediate and long-term water needs are met efficiently (WR-1.6), development of emergency inter-tie projects among water suppliers (WR-1.7), and encouragement of consolidation of water suppliers (WR-1.8). Regional and countywide planning would help to promote management efficiencies and the sharing of local resources, which are intended improve water demand management and water supply availability in the county.

Furthermore, various policies the water supply impacts of discretionary development projects, such as whether a project is located within a watershed where a water source could be adversely affected (WR-1.2), including State water sources (WR-1.4) and if adequate long-term water supply can be demonstrated (WR-1.11). Policy WR.4.5 requires that discretionary development shall not significantly impact the quantity or quality of water resources within watersheds, groundwater recharge areas or groundwater basins. The 2040 General Plan also requires conditions of approval on water use at new golf courses (WR-1.14). Terms for approval of discretionary development could also include water conservation components, including use of reclaimed water, low-flow plumbing fixtures (WR-3.2), and low-impact development (WR-3.3). These policies support Water Element Implementation Program F, which requires that all discretionary development demonstrate an adequate long-term supply of water prior to project approval.

As indicated above, future development under the 2040 General Plan would increase water demand related to population growth by approximately 491,900 gallons per day, assuming a use rate of 120 gallons per day per capita plus additional increases to due to industrial and commercial uses.

For additional discussion of the reasonably foreseeable impacts of supplying water refer to Section 4.10, "Hydrology and Water Quality." Potential impacts from using groundwater for water supply are addressed in Impacts 4.10-1, 4.10-2, 4.10-3, and 4.10-4, which address the potential for groundwater extraction that results in an overdrafted basin, net decrease in the amount of groundwater within an overdrafted basin, and net annual increases in groundwater extraction that exceed 1.0 acre-foot. Impact 4.10-7 addresses increases in surface water consumptive use (demand) within a fully appreciated stream reach. Impact 4.10-8 addresses increases in surface water consumptive use (demand) including but not limited to diversion or dewatering of downstream reaches that adversely affect one or more beneficial uses of the surface water source.

Overall, the 2040 General Plan policies contain various methods of water conservation and water planning, which would improve water management in the county. Discretionary development would be required to demonstrate an adequate long-term supply of water prior to project approval. Although the 2040 General Plan would include policies to conserve water and result in adequate long-term water supplies for future development, existing County standards in the VCWWM do not guarantee that water supplies be available to serve all future development during normal, single-dry, and multiple-dry years. Thus, based on available information about water supplies and demand at this program level of analysis, future development accommodated by the 2040 General Plan could adversely affect available water supplies during normal, single-dry, and multiple-dry year scenarios from public water suppliers, with adverse effects being more likely during single- and multiple-dry year scenarios. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure UTL-1: New Implementation Program WR-X: Demonstrate Adequate Water Supply during Normal, Single-Dry, and Multiple-Dry Years

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program WR-X: Demonstrate Adequate Water Supply during Normal, Single-Dry, and Multiple-Dry Years

Water-demand projects (as defined in Section 15155 of the State CEQA Guidelines) that require service from a public water system shall prepare a water supply assessment prior to project approval. If the projected water demand associated with the project was not accounted for in the most recently adopted urban water management plan, or the public water system has no urban water management plan, the water supply assessment must address the public water system's total projected water supplies available during normal, single-dry, and multiple-dry water years for a 20-year projection. The assessment shall describe if the new water service will be sufficiently met under this 20-year projection. The water supply assessment shall be prepared to the satisfaction of and approved by the governing body of the affected public water system and the County. If, as a result of its assessment, the public water system concludes that its water supplies are, or will be, insufficient, the public water system shall provide to the County its plans for acquiring additional water supplies. A water-demand project that includes a new water service from a public water system shall not be approved unless adequate water supplies are demonstrated.

Significance after Mitigation

Water is a critical resource in the county and throughout California. Regulations related to water supply assessment and verification requirements for certain types of projects have been adopted by the California Legislature. (See Water Code Section 10910 et seq. [water supply assessments] and Government Code Section 66473.7 [water supply verifications].) As provided in Section 15155(f) of the State CEQA Guidelines, the degree of certainty required for analysis of a general plan is less than that appropriate for a specific development project and information contained in a water supply assessment or UWMP may be incorporated into the decision-making process. Mitigation Measure UTL-1 incorporates industry-standard adequacy principles to ensure that the County consistently develops the information needed to evaluate the impacts at the project-level associated with providing water supply to future water demand projects.

This mitigation measure, together with the County's existing WAL and WSL requirements and 2040 General Plan policies and programs, including the requirement for discretionary development to demonstrate an adequate long term supply of water prior to project approval, would reduce the potential for future development to adversely affect water supplies during normal, single dry, and multiple dry years. However, at this program level of analysis it is not possible to conclude that adequate water supplies would be available during normal, single-, and multiple dry years to meet future demand in all locations of the county for all potential project types through 2040. Therefore, this impact would be **significant and unavoidable**.

Impact 4.17-5: Result in a Direct or Indirect Adverse Effect on a Landfill's Disposal Capacity, Such That It Reduces Its Useful Life to Less Than 15 Years

As discussed in the Background Report, there are two active solid waste disposal/landfill sites in the county: Toland Road Landfill and Simi Valley Landfill and Recycling Center; and, two landfills located outside of the county that accept waste from Ventura County: Calabasas Landfill and Chiquita Canyon Landfill. Currently Simi Valley Landfill and Recycling Center has the longest estimated useful life through 2052, followed by Chiquita Canyon Landfill (estimated to cease operations in 2047), Calabasas Landfill (estimated to cease operations in 2029), and Toland Road Landfill (estimated to cease operations in 2027) (CalRecycle 2019a). Table 4.17-3 provides an overview of landfills that accept waste from the county, including daily throughput, remaining capacity, and maximum permitted capacity.

Table 4.17-3 Existing Landfill Capacity

Facility	Daily Throughput (tons/day)	Remaining Capacity (cubic yards)	Maximum Permitted Capacity (cubic yards)
Calabasas Landfill	3,500	14,500,000	69,300,000
Chiquita Canyon Landfill	12,000	60,408,000	110,366,000
Simi Valley Landfill and Recycling Center	9,250	88,300,000	119,600,000
Toland Road Landfill	1,500	10,571,820	30,000,000
Total	26,250	173,779,820	329,266,000

Source: CalRecycle 2019b

Future development under the 2040 General Plan would contribute to an increase in solid waste generation because of increased population levels and new businesses. Based on CalRecycle's generation rates, county solid waste quantities would increase by approximately 24 tons per day (10.53 lbs/employee/day for 2,986 employees and 12.23 lbs/household/day for 1,281 housing units).

This is a relatively small portion of the total throughput available at landfills that accept solid waste from Ventura County (26,250 tons/day). In addition, the 2040 General Plan policies promote solid waste reduction, recycling, and composting efforts, including redistribution of edible food that would otherwise be disposed of in landfills (PFS-5.4). Policies also direct the County to support beneficial reuse of agricultural waste for activities such as composting and energy generation (PFS-5.5), and value-added alternatives to waste disposal, such as compost, energy, biochar, and wood products (PFS-5.6). In addition, the County would encourage applicants for discretionary development to employ practices that reduce the quantities of waste generated and engage in recycling activities to further reduce the volume of waste disposed of in landfills (PFS-5.9). These policies would reduce disposal quantities to landfills, which could in turn promote an extension of the facilities' useful life. As provide in the Background Report, State statutes and requirements include diversion requirements related to organic waste and recyclable materials. The 2040 General Plan would support these regulations and would not conflict with waste reduction and diversion goals. Because there is substantial capacity available at the landfills that serve the county (as shown in Table 4.17-3), and because implementation of 2040 General Plan policies would aid in the long-term reduction of solid-waste generation in the county and State-mandated diversion requirements related to organic waste and recyclable materials would be supported, this impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

5 CUMULATIVE IMPACTS

CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable, or which can compound or increase other environmental impacts.” Section 15130 of the State CEQA Guidelines requires that an EIR evaluate potential environmental impacts that are individually limited but cumulatively considerable. These impacts can result from the proposed project alone, or together with other projects. The State CEQA Guidelines state: “The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects” (State CEQA Guidelines, Section 15355). A cumulative impact of concern under CEQA occurs when the net result of combined individual impacts compounds or increases other overall environmental impacts (State CEQA Guidelines, Section 15355). In other words, cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. CEQA does not require an analysis of incremental effects that are not cumulatively considerable nor is there a requirement to discuss impacts that do not result in part from the project evaluated in the EIR.

The State CEQA Guidelines Section 15130 describes the requirements for the discussion of cumulative impacts in an EIR. It states that an EIR must discuss cumulative impacts of a project “when the project’s incremental effect is cumulatively considerable, as defined in section 15065(a)(3).” (State CEQA Guidelines, Section 15130[a].) In other words, CEQA requires a lead agency to undertake a two-step analysis. First, the agency must consider whether the combined effects from the proposed project and other projects would be cumulatively significant. And second, if the answer is yes, the agency must then consider whether the proposed project’s incremental effects are cumulatively considerable. The EIR need not provide as much detail as is provided for the impacts attributable to the project alone. Instead, the discussion will reflect the severity of the impacts and their likelihood of occurrence. In addition, the State CEQA Guidelines allow for a project’s contribution to be rendered less than cumulatively considerable with implementation of appropriate mitigation.

5.1 METHODS OF ANALYSIS

The environmental analysis of the 2040 General Plan presented throughout this draft EIR is a cumulative analysis of impacts of future development under the 2040 General Plan, and this draft EIR contains detailed analysis of regional (cumulative) impacts at the county level. Additionally, the following discussion examines impacts associated with future development under the 2040 General Plan, plus future development for jurisdictions that neighbor the unincorporated areas of the county, to assess the potential for cumulative impacts from growth in the greater region. As shown in the analysis below, Ventura County is generally surrounded by other counties that expect varying degrees of growth.

When evaluating cumulative impacts, CEQA allows the use of either a list of past, present, and probable future projects (including projects outside the control of the lead agency), or a summary of projections in an adopted planning document, or a thoughtful combination of the two approaches. The cumulative analysis presented below uses a projections-based approach. As described in Chapter 3, “Project Description,” land use and growth projections for

Ventura County, which are the subject of analysis throughout this draft EIR, are combined with the growth projections for the incorporated cities and adjoining counties. The three counties adjacent to Ventura County— Santa Barbara, Kern, and Los Angeles counties—are shown in Figure 5-1 and described briefly below. The area that includes unincorporated Ventura County, the incorporated cities, and the adjoining counties is referred to in this analysis as the “cumulative impact area.”

As shown in Table 5-1, the population for the three counties surrounding Ventura County is projected to grow from approximately 11,640,000 people in 2018 to 13,200,000 people by 2040, an increase of 13 percent. Growth rates for Santa Barbara and Los Angeles counties would be similar to those forecasted for Ventura County, while Kern County’s population is projected to increase by more than five times that of Ventura County through 2040.

Table 5-1 Population Projections of Cumulative Impact Area 2018 – 2040

County	Population		Percentage Increase
	2018 ¹	2040 ²	
Santa Barbara	453,288	520,000	15%
Kern	907,518	1,469,500	62%
Los Angeles	10,278,836	11,514,000	12%
Ventura	855,489	966,000	13%
Total, Counties	12,495,131	14,469,500	16%

¹ 2018 population projects are derived from the California Department of Finance.

² Population projection for Kern County reflects 2042.

Sources: Santa Barbara County Association of Governments 2013; Kern Council of Governments 2018; SCAG 2016; California Department of Finance 2019

Incorporated Cities: Ten incorporated cities are located within Ventura County: Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Santa Paula, Simi Valley, Thousand Oaks, and Ventura. The County of Ventura has land use regulatory authority over most unincorporated land in the county, but lacks land use authority within the incorporated cities. Therefore, this draft EIR does not directly analyze and mitigate for impacts of future development in the incorporated cities. Future development in these cities is included in the draft EIR’s consideration of cumulative impacts. Table 5-2 provides projected population growth within the incorporated cities of Ventura County from 2018 to 2040.

Table 5-2 Forecasted Growth of Incorporated Cities within Ventura County

City	Population		Percentage Change
	2018	2040 ¹	
Camarillo	68,452	79,900	17%
Fillmore	15,840	21,800	38%
Moorpark	36,828	43,000	17%
Ojai	7,741	8,400	9%
Oxnard	209,269	237,300	13%
Port Hueneme	23,370	22,400	-4%
San Buenaventura (Ventura)	110,125	125,300	14%
Santa Paula	30,931	39,600	28%
Simi Valley	127,421	142,400	12%
Thousand Oaks	130,283	131,700	1%
Total, Incorporated Cities	760,260	851,800	12%

¹ Population projection for Kern County reflects 2042.

Sources: Santa Barbara County Association of Governments 2013; Kern Council of Governments 2018; SCAG 2016; California Department of Finance 2019



Source: Ventura County, 2016

Figure 5-1 Cumulative Impact Area

Santa Barbara County: Santa Barbara County is located north of Ventura County along the coast. Similar to Ventura County, developed areas are located primarily along State Route 101. The majority of Santa Barbara County is comprised of government or conservancy-owned lands, including Vandenberg Air Force Base and Los Padres National Forest.

The Santa Barbara County Association of Governments (SBCAG) adopted the Regional Growth Forecast 2010-2040 in December 2012. The purpose of the Regional Growth Forecast is to provide a consistent economic and population growth forecast to the year 2040 for use in long-range comprehensive planning. The 2040 projections indicate that the population in the SBCAG region is expected to grow by 96,165 people between 2010 and 2040. During this time period, employment within the region is expected to grow by 60,200 jobs and new households are expected to increase by 41,500 (SBCAG 2013).

Kern County: Kern County is located east of Ventura County and extends from the southern San Joaquin Valley into the Sierra Nevada and high desert region of California. Kern County is predominately comprised of rural lands such as open space and productive farming. The majority of Kern County's population lives within the metropolitan area of Bakersfield (Kern Council of Government [Kern COG] 2018).

The population is currently estimated to grow to 1,469,500 by 2042, the horizon year for the Kern COG's Regional Transportation Plan (RTP). Projections indicate that households would increase from 268,306 in 2017 to 443,700 in 2042; and employment rates would increase from 325,300 in 2017 to 483,500 in 2042 (Kern COG 2018).

Los Angeles County: Los Angeles County is located south and east of Ventura County along the coast. Population centers are located in the western portion of the county and more rural lands, located within the eastern portion of the county, are primarily within the Angeles National Forest.

The population of Los Angeles County is forecasted to increase from 9,923,000 in 2012 to 11,515,000 in 2040. Growth during this timeframe would also include an increase of 689,000 new households and 980,000 new jobs (SCAG 2016).

5.2 CUMULATIVE IMPACTS

The following analysis examines the cumulative effects of future development under the 2040 General Plan within the cumulative impact analysis area, unless otherwise noted. Because the 2040 General Plan could accommodate development across a large geographical area (unincorporated parts of Ventura County) over a long period of time (through 2040), the analysis presented throughout this draft EIR is inherently cumulative, as discussed above. The potential for cumulative effects associated with future development under the 2040 General Plan in combination with development of the incorporated cities within Ventura County and the surrounding counties are summarized qualitatively below for each of the resource topics analyzed in Chapter 4, "Environmental Impact Analysis."

The State CEQA Guidelines Section 15130(b)(3) directs lead agencies to define the geographic scope of the area affected by the cumulative effect and to provide a reasonable explanation for the geographic limitation used. The geographic scope defines the area within which a proposed project and related projects may contribute to a specific cumulative impact.

The geographic scope of the cumulative impact analysis varies depending upon the specific environmental issue being analyzed. The geographic scope for each environmental issue analyzed in this draft EIR is identified in Table 5-3. For many of the resource areas, including geologic hazards, noise and vibration, and public services and recreation, impacts would by their nature be location specific, and would not be expected to combine with the effects of development outside of the county to result in any additional impacts not already addressed in this draft EIR.

Table 5-3 Geographic Scope of Cumulative Impacts

Environmental Issue Area	Geographic Scope of Cumulative Analysis
Aesthetics, Scenic Resources, and Light Pollution	County and land in surrounding counties that have views of county land
Agriculture and Forestry Resources	County and surrounding counties
Air Quality	South Central Coast Air Basin
Biological Resources	County and surrounding counties (and statewide as appropriate)
Cultural, Tribal Cultural, and Paleontological Resources	Local (limited to plan area and off-site improvement areas), with regional implications
Energy	County and surrounding counties
Geologic Hazards	County (impacts are primarily localized)
Greenhouse Gas and Climate Change	Global
Hazards, Hazardous Materials, and Wildfire	County (impacts are primarily localized) for hazards and hazardous materials; regional for wildfire
Hydrology and Water Quality	County and shared watersheds, aquifers, and waterways of surrounding counties
Land Use and Planning	County (impacts are primarily localized)
Mineral and Petroleum Resources	County (impacts are primarily localized)
Noise and Vibration	County (impacts are primarily localized)
Population and Housing	County and surrounding counties
Public Services and Recreation	County and surrounding counties, local service areas for public services
Transportation and Traffic	County and surrounding counties
Utilities	Local service areas

Source: Prepared by Ascent in 2019

5.2.1 Aesthetics, Scenic Resources, and Light Pollution

Visual resources impacts associated with future development under the 2040 General Plan are analyzed in Section 4.1, “Aesthetics, Scenic Resources, and Light Pollution.” Effects on scenic resources generally occur at the interface between development and the scenic resources, and tend to be localized. The county has been growing and developing over many years and individual projects have been subject to General Plan policies, zoning, and other ordinances or regulations in place to protect scenic resources. As described in Section 4.1, impacts resulting from implementation of the 2040 General Plan associated with changes to scenic resources, visual character and quality, light and glare affecting day or nighttime views, and glare effects along Regional Road Network Roadways would be less than significant (with mitigation measures) at the county scale due to the designation of key resource areas as open space by the land use diagram of the 2040 General Plan, existing and proposed restrictions on development within established scenic resource protection zones, the Non-Coastal Zoning Ordinance (NCZO),

Coastal Zoning Ordinance (CZO), implementation of 2040 General Plan policies, and compliance with Area Plan policies that protect scenic resources. The incremental effects of the 2040 General Plan related to scenic resources, visual character and quality, and light and glare would not combine with development that would occur as a result of forecasted growth in adjacent counties to produce cumulatively considerable cumulative impacts because adjacent jurisdictions, including incorporated cities and adjacent counties, have general plan policies, zoning, and other ordinances or regulations in place to protect scenic resources and limit light and glare within their jurisdictions. Projected growth within these jurisdictions would be required to comply with applicable regulations pertaining to scenic resources and light and glare. The 2040 General Plan's incremental impacts related to aesthetics, scenic resources, and light and glare would not be cumulatively significant, and the project would not have a considerable contribution such that a new cumulatively significant impact would occur.

5.2.2 Agriculture and Forestry Resources

As described in Section 4.2, "Agriculture and Forestry Resources," as of 2016, the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) had inventoried over 555,000 acres of land in the county, classifying over 18,000 acres of land as Important Farmland. Overall, a total of 39 percent of the land within the county is designated as Important Farmland. Past development has resulted in the conversion of land from agricultural production to urban development, leading to a substantial loss of Important Farmland to other uses; this trend is expected to continue. Future development under the 2040 General Plan has the potential to result in conversion of land uses, including agricultural lands, to urban uses. Implementation of mitigation measures would require that discretionary development avoid Important Farmland as much as feasibly possible and require agricultural conservation easements as compensatory mitigation for the conversion of agricultural land to a non-agricultural use. While conservation easements would prevent other existing agricultural lands from future conversion, they would not prevent the loss of agricultural lands nor would they fully compensate for this loss. Further, implementation of cumulative development outside the county, particularly in Kern County where the majority of growth in the cumulative impact area would occur, would be expected to result in conversion of farmland, due to its location on the San Joaquin Valley floor, which contains large areas of Important Farmland. The potential for cumulative impacts related to agricultural resources is cumulatively significant, and the impact would be cumulatively considerable. The proposed mitigation measures, which would include avoiding development of agricultural land and conserving Important Farmland at a 2:1 ratio through conservation easements, provide the maximum feasible mitigation. While this mitigation would reduce the 2040 General Plan's incremental contribution to the cumulative impact, the 2040 General Plan would have a cumulatively considerable contribution to a cumulatively significant impact because there are no actions or policies to fully replace the loss of Important Farmland.

Forest lands, specifically the Los Padres National Forest, are also present in Ventura County; however, forestry resources are concentrated in the national forest, which is protected from future development. As described in Section 4.2, the 2040 General Plan would not conflict or result in a loss of land zoned as forestland, timberland, or Timberland Production Zone. Therefore, implementation of the 2040 General Plan, when taken together with other projected growth and development within the region, would not combine to create a cumulatively significant impact to forest resources.

5.2.3 Air Quality

Air quality impacts are assessed at the air basin level. As a result, the impacts identified in Section 4.3, "Air Quality," are inherently cumulative. Ventura County is located within the South Central Coast Air Basin (SCCAB), along with Santa Barbara and San Luis Obispo counties. Thus, for this cumulative analysis, the SCCAB and the regions that affect air quality within Ventura County define the geographic context.

With implementation of Mitigation Measure AQ-3, the development of individual discretionary projects associated with the 2040 General Plan would not result in the exposure of new sensitive receptors to a substantial increase in future operational toxic air contaminant (TAC) emissions from roadway traffic or stationary sources. While this is a localized impact, cumulative development within incorporated cities located adjacent to the plan area and elsewhere in the SCCAB could result in increased operational TAC emission sources. This would be a cumulatively significant impact. The 2040 General Plan includes a new policy that would protect sensitive receptors from exposure to TAC emissions. This policy would reduce the 2040 General Plan's contribution to this cumulatively significant impact to a level that is less than cumulatively considerable.

Ventura County is in nonattainment for ozone with respect to the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS), and nonattainment for particular matter 10 micrometers or less in diameter (PM₁₀) with respect to the CAAQS. Construction activities resulting from implementation of the 2040 General Plan could contribute substantially to Ventura County's nonattainment status for ozone and PM₁₀ and could result in an increase in the potential for adverse health impacts to occur from ozone and PM₁₀. Cumulative development within incorporated cities located adjacent to the plan area and elsewhere in the SCCAB would also result in increased criteria air pollutant emissions due to construction and operational activities, including increased ozone and PM₁₀ emissions. This is a cumulatively significant construction and operational impact. Implementation of mitigation measures described in Section 4.3, "Air Quality," would reduce construction-related air pollutant emissions. However, because Ventura County is in nonattainment for PM₁₀ with respect to the CAAQS, construction associated with the 2040 General Plan could further worsen this existing air quality condition. The 2040 General Plan's contribution to this cumulatively significant construction air quality impact would remain cumulatively considerable.

Additionally, because the number and nature of future development projects that could be under construction at the same time is unknown, reactive organic gases (ROG) and oxides of nitrogen (NO_x) emissions could exceed Ventura County Air Pollution Control District's (VCAPCD's) thresholds within the Ojai Valley. Furthermore, future development and other physical changes that could occur as a result of 2040 General Plan implementation would result in long-term operational emissions of ROG, NO_x, PM₁₀, and particular matter 10 micrometers or less in diameter (PM_{2.5}). While individual projects may be able to reduce emissions to levels below applicable thresholds, the total operational emissions attributable to forecasted growth accommodated under the 2040 General 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 included in the 2040 General Plan; therefore, the 2040 General Plan's incremental contribution to this significant cumulative operational air quality impact would remain cumulatively considerable.

The 2040 General Plan would have a less than significant odor impact, and when considered in combination with odors generated by cumulative development, would not result in a cumulatively significant odors impact affecting substantial numbers of people. Same as the 2040 General Plan, cumulative development would be subject to VCAPCD and other air district rules addressing the generation of odors. The 2040 General Plan would not have a cumulatively considerable contribution to a cumulatively significant odors impact.

5.2.4 Biological Resources

Past development in Ventura County has resulted in a substantial loss of native habitat to other uses, with adverse effect on native plants and animals. Although most future projects proposed in the region would be required to mitigate significant impacts on terrestrial biological resources, in compliance with CEQA, the federal Endangered Species Act (ESA), the California Endangered Species Act (CESA), and other State, local, and federal statutes, many types of common habitats and species are provided no protection. Therefore, it can be expected that the net loss of native habitat for plants and wildlife, agricultural lands, and open space areas that support important terrestrial biological resources in Ventura County will continue.

The effect of future development under the 2040 General Plan on biological resources is analyzed in Section 4.4, "Biological Resources." As noted in Section 4.4, implementation of the proposed land use diagram could result in adverse impacts on special-status species and sensitive habitats, such as riparian habitats, sensitive plant communities, Environmentally Sensitive Habitat Areas (ESHA), coastal beaches, sand dunes, and other sensitive natural communities. Compliance with federal, State, and local laws protecting biological resources as well as 2040 General Plan policies and programs would substantially lessen the likelihood of adverse effects on special-status species and sensitive habitats; however, because the exact location of future development is not known, and because countywide mapping or inventory of special-status species and habitats has not been conducted, impacts to these resources could still occur and would be significant and unavoidable. Similarly, development pursuant to other local and regional planning efforts within the greater cumulative impact area could also have impacts on special-status species and sensitive habitat, which could be significant even with compliance with federal, State, and local laws protecting biological resources. Regional development in surrounding counties may result in similar impacts, although cumulative development in some portions of the cumulative analysis area are expected to occur in areas with different habitat types (e.g., habitat associated with the San Joaquin Valley floor and surrounding existing urban areas such as Bakersfield). Because impacts on special-status species and sensitive habitats would remain significant and unavoidable even with mitigation measures, the potential for cumulative impacts related to special-status species and sensitive habitats would be cumulatively significant, and the project would have a cumulatively considerable contribution.

Future development under the 2040 General Plan may result in potential loss or degradation of State or federally protected wetlands and other waters. However, future development would be concentrated in the Existing Community area designation (boundary) and Urban area designation (boundary), and the 2040 General Plan includes several mitigation measures that would further reduce potential impacts on state or federally protected wetlands and other waters. Additionally, compliance with State law, federal law, and the Ventura County Coastal Area Plan would reduce potential impacts of future development under the 2040 General Plan and require project-level environmental review under CEQA to evaluate potential impacts on biological resources and mitigate significant impacts on wetland habitats.

Nonetheless, while these laws, policies, and implementation programs would reduce the likelihood of adverse effects on wetlands, the project would result in a significant and unavoidable impact due to the wide variety of future project types, site conditions, and other circumstances associated with future development. Because impacts on special-status species and sensitive habitats would remain significant and unavoidable even with mitigation measures, the potential for cumulative impacts related to State or federally protected wetlands and other waters would be cumulatively significant, and the project would have a cumulatively considerable contribution.

Implementing the 2040 General Plan could result in the potential loss or degradation of wildlife movement corridors or disturbances to wildlife nursery sites. Due to the wide variety of future project types, site conditions, and other circumstances associated with future development, this impact would be significant and unavoidable. Because impacts on wildlife movement corridors and wildlife nursery sites would remain significant and unavoidable even with mitigation measures, the potential for cumulative impacts related to wildlife movement corridors and wildlife nursery sites would be cumulatively significant, and the project would have a cumulatively considerable contribution.

Because applicants for projects requiring discretionary approval would be required to abide by the restrictions in and implement mitigation based on the Ventura County Oak Woodland Management Plan and Tree Protection Regulations, future development under the 2040 General Plan is not expected to conflict with these plans and ordinances. Similarly, other cumulative development would be required to adhere to these plans and ordinances. Thus, the incremental effects of the 2040 General Plan would not combine with cumulative development that would occur as a result of future growth to produce cumulatively considerable impacts related to potential conflicts with local policies or ordinances protecting biological resources.

5.2.5 Cultural, Tribal Cultural, and Paleontological Resources

As described in Section 4.5, “Cultural, Tribal Cultural, and Paleontological Resources,” the county is archaeologically and culturally significant, with many archaeological resources located near former water and food sources. Some of these resources could have regional significance, while for others the resources themselves are site-specific, and impacts to them are project-specific. For example, impacts to a subsurface archeological find at one project site are generally not made worse by impacts from another project to a cultural resource at another site. Rather, the resources and the effects upon them are generally independent. However, other resources, such as archaeological resources, tribal cultural resources, and paleontological resources, could have regional importance, and individual impacts to these resources could collectively result in greater, more adverse impacts. Because all significant cultural resources are unique and nonrenewable members of finite classes, meaning there are a limited number of significant cultural resources, all adverse effects erode a dwindling resource base. As a result, the potential for cumulative impacts related to cultural, tribal cultural, and paleontological resources is cumulatively significant, and the impact would be cumulatively considerable. The impacts of future development under 2040 General Plan would be individually significant even with the implementation of mitigation measures. Similarly, cumulative development would be required to implement similar mitigation to avoid or reduce impacts. Nonetheless, because the potential for permanent loss of known or unknown resources cannot be guaranteed, the impacts of the 2040 General Plan would combine with cumulative impacts to cultural, tribal cultural, and paleontological resources in the incorporated cities and surrounding counties to create cumulatively significant impacts, and the incremental impact of the 2040 General Plan would be cumulatively considerable.

5.2.6 Energy

Potential impacts related to increased energy consumption from future development under the 2040 General Plan are evaluated in Section 4.6, “Energy.” Construction that could occur with future development under the 2040 General Plan would result in a temporary increase in fuel consumption. However, it is anticipated that fuel would not typically be consumed in a wasteful manner during construction of individual projects under the 2040 General Plan, as it is in the interest of construction contractors to meet project schedules and minimize costs. This translates to various efficiencies, including in the use of energy resources. Through the policies and programs of the 2040 General Plan, transportation-related energy would be reduced through improved access to transit alternatives and innovative shared transportation models. Under the 2040 General 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 due to State regulations and energy efficiency measures would be integrated into new construction and existing buildings. In addition, the 2040 General Plan contains policies that include the use of biomethane produced from organic waste, installation of electric vehicle charging stations at public facilities to further transition vehicle ownership to zero emissions vehicles, and a robust set of vehicle miles traveled (VMT) reduction measures that encourage alternative modes of transportation to reduce overall motor vehicle use and associated gas and diesel consumption.

Development in surrounding counties will also consume energy; however, it is likely that the same or similar factors governing development in these areas would result in efficient energy use. For example, construction contractors would be encouraged to be energy efficient as a matter of best business practices, and would be required to adhere to air quality standards that require minimization of emissions and strict energy standards. Therefore, the potential for cumulative impacts related to energy would not be cumulatively significant on a regional scale. As such, despite other growth and development in the cumulative impact analysis area that could result in increases in the demand for energy, future development under the 2040 General Plan would not result in the wasteful or inefficient use of energy and its incremental contribution to cumulative energy impacts would not be cumulatively considerable.

5.2.7 Geologic Hazards

Impacts related to geologic hazards that may result from future development under the 2040 General Plan are analyzed in Section 4.7, “Geologic Hazards.”. Geology and soils impacts may be related to increased exposure to seismic hazards and increased risks associated with landslide, soil expansion, and subsidence. These effects would occur independently of one another and are related to site-specific and project-specific characteristics and conditions. Because these effects are generally localized, they typically do not combine to result in greater cumulative impacts. In addition, existing regulations specify mandatory actions that must occur during project development, which would adequately address the potential for effects from construction or operation of projects related to geology, soils, and seismicity. For example, construction of future projects would be subject to applicable codes and regulations and seismic safety requirements and recommendations contained in project-specific geotechnical reports. It is anticipated, therefore, that any potential impacts associated with geologic and soil conditions would be mitigated within the respective sites of these future projects.

As described in Section 4.7, impacts resulting from implementation of the 2040 General Plan associated with geologic hazards would be less than significant because future development under the General Plan would be required to adhere to existing regulations (including the Ventura County Building Code) and General Plan policies and programs. The incremental effects of the 2040 General Plan related to geologic hazards would not combine with development that would occur as a result of other forecasted growth to produce cumulatively considerable cumulative impacts because future projects would also be required to comply with applicable regulations to minimize geologic hazards. Therefore, the 2040 General Plan's incremental impacts related to geologic hazards would not be cumulatively significant, and the project's contribution to this impact would not be cumulatively considerable such that a new cumulatively significant impact would occur.

5.2.8 Greenhouse Gas Emissions

Climate change is an inherently cumulative issue and relates to development in the region, California, and, most of all, the world. Therefore, the impacts discussed in Section 4.8, "Greenhouse Gas Emissions," are also the cumulative effects of implementation of future development under the 2040 General Plan. The 2040 General Plan includes a number of policies and programs that would help to reduce greenhouse gas (GHG) emissions in all sectors, including policies and programs that would reduce GHG emissions from the two largest GHG sectors in the county: energy and mobile sources. However, while evidence demonstrates that the policies and programs of the 2040 General Plan would support GHG reductions, for several reasons as described in Section 4.8, the future GHG reduction effectiveness of 2040 General Plan implementation cannot be reliably quantified and compared to the State's 2030 target and post-2030 reductions. Several mitigation measures are identified to further lessen future GHG emissions, but not to a less than significant level. As a result, the 2040 General Plan would result in a significant and unavoidable impact. No additional mitigation or information regarding future available technology advancements or future State plans for achieving post-2030 emission reductions is available at this time that can be further quantified or estimated qualitatively. Thus, the 2040 General Plan's incremental contribution to cumulatively significant climate change effects would be cumulatively considerable.

5.2.9 Hazards, Hazardous Materials, and Wildfire

Impacts associated with hazards, hazardous materials, and wildfire related to future development under the 2040 General Plan are analyzed in Section 4.9, "Hazards, Hazardous Materials, and Wildfire." Topics addressed in this section are related to the transport, use, or disposal of hazardous materials or hazardous waste; reasonably foreseeable upset and accident conditions; hazardous emissions, particularly near schools; inclusion on a list of hazardous materials sites; proximity to airports; and risk of wildfires. Existing regulations specify mandatory actions that must occur during project development and operation related to the management and land use planning associated with hazardous materials and potential safety issues related to proximity to schools and airports. In addition, impacts related to hazardous materials and safety issues generally occur independently of one another and are related to site-specific and project-specific characteristics and conditions. Because these effects are generally localized, they typically do not combine to result in greater cumulative impacts.

As described in Section 4.9, impacts resulting from implementation of the 2040 General Plan associated with hazards and hazardous materials would be less than significant because County activities and discretionary development would be required to comply with federal, State, and local regulations as well as 2040 General Plan policies and implementation programs that would substantially lessen potential impacts. The incremental effects of the 2040 General Plan related to hazards and hazardous materials would not combine with development that would occur as a result of other forecasted growth to produce cumulatively considerable cumulative impacts because future projects would also be required to comply with federal, State, and local regulations to minimize hazards and hazardous materials impacts. With implementation of existing regulations, the 2040 General Plan's incremental impacts related to hazards and hazardous materials would not be cumulatively significant, and the project would not have a considerable contribution such that a new cumulatively significant impact related to hazards and hazardous materials would occur.

As discussed in Section 4.9, wildfires have caused destruction to large areas of rural and urban lands in Ventura County. Thus, wildfire risk within the county and cumulative impacts area is an existing significant cumulative condition, particularly within very high and high fire hazard severity zones (FHSVs). Implementation of the 2040 General Plan would result in a potentially significant impact from the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires because new residential, commercial, and industrial development would occur in or adjacent to high and very high FHSZs or Hazardous Fire Hazard Areas. Santa Barbara, Los Angeles, and Kern counties and incorporated cities in Ventura County also contain large areas of high and very high FHSZs and cumulative development in or adjacent to these areas would similarly be exposed to and would exacerbate wildfire risk and wildfire-related adverse effects. As discussed in Impact 4.9-6, implementation of 2040 General Plan policies and implementation programs and compliance with State and federal law would reduce fire hazard risks associated with development to the extent feasible. However, existing and future development would continue to remain and be added in fire hazard areas and, thus, complete elimination of those risks would not be feasible. As a result, implementation of the 2040 General Plan would have an incremental contribution to a cumulatively significant wildfire impact, and this impact would be cumulatively considerable.

5.2.10 Hydrology and Water Quality

Impacts associated with water resources related to future development under the 2040 General Plan are analyzed in Section 4.10, "Hydrology and Water Quality." Water resources impacts may be related to hydrology and water quality, including groundwater quantity and quality, surface water quantity and quality, hydraulic hazards, seiche and tsunami hazards, and flood control facilities and watercourses; these are discussed in more detail below. Existing regulations specify mandatory actions that must occur during project development, which would adequately address the potential for construction or operation of projects to affect water quality and potential water-related hazards, as noted throughout the impacts discussed in Section 4.10. These existing regulations and requirements governing hydrology and water quality would also apply to future development in the cumulative impact area.

Groundwater

Of the various groundwater basins that exist within the county, several are in overdraft. As described in Section 4.10, groundwater sustainability plans (GSPs) have been completed or are in development for these overdrafted groundwater basins, and future development under the 2040 General Plan would be required to be consistent with these GSPs. As such, the 2040 General Plan would not decrease the net quantity of groundwater in an overdrafted groundwater basin or create an overdrafted groundwater basin. Additionally, through compliance with the Sustainable Groundwater Management Act (SGMA) and adopted GSPs, the 2040 General Plan would not result in net groundwater extraction that results in the overdrafting the groundwater basins or associated hydrologic units. Further, because additional groundwater extraction above existing conditions is limited by County Ordinance 4468, implementation of the 2040 General Plan would not result in a net increase in groundwater extraction that would adversely affect the underlying groundwater basins. Regarding groundwater quality, implementation of the 2040 General Plan would not result in groundwater quality impacts that would exceed groundwater quality objectives set by the Basin Plans.

The incremental effects of the 2040 General Plan related to groundwater quantity and quality would not combine with development that would occur as a result of other forecasted growth to produce cumulatively considerable cumulative impacts because future projects would also be required to comply with the SGMA, adopted GSPs, County ordinances, and policies and programs of the 2040 General Plan. With implementation of these existing regulations, the 2040 General Plan's incremental impacts related to groundwater quantity and quality would not be cumulatively significant, and the project would not have a considerable contribution such that a new cumulatively significant impact related to groundwater quantity or quality would occur.

Fully Appropriated Streams

Several fully appropriated streams are located within the county. Because the appropriation of water occurs at the State level, the County cannot authorize additional consumptive use of these waters. Further, discretionary development is required to demonstrate provision of access to adequate water supply through the permit application process. Therefore, the 2040 General Plan would not increase demand for surface water from a fully appropriated stream reach, or where unappropriated surface water is unavailable. The incremental effects of the 2040 General Plan related to fully appropriated streams would not combine with development that would occur as a result of other forecasted growth to produce a cumulatively significant impact because future projects would also be required to comply with the permit application process. With implementation of these existing regulations, the 2040 General Plan's incremental impacts related to fully appropriated streams would not be cumulatively considerable, and the project would not have a considerable contribution such that a new cumulatively significant impact related to fully appropriated streams would occur.

Basin Plans

Through compliance with existing federal and State regulations, the 2040 General Plan would not result in diversion or dewatering downstream reaches that would result in an adverse impact on the beneficial uses listed in the Basin Plans, nor would it result in degradation of surface water quality, causing it to exceed the water quality objectives contained in the Basin Plans. The incremental effects of the 2040 General Plan related to the Basin Plans would not combine with development that would occur as a result of other forecasted growth to produce a cumulatively significant impact because future projects would also be required to comply with existing federal and State regulations.

Thus, the 2040 General Plan's incremental impacts related to the Basin Plans would not be cumulatively considerable, and the project would not have a considerable contribution such that a new cumulatively significant impact related to the Basin Plans would occur.

Stormwater Quality

Through compliance with existing regulations and permits, such as the National Pollutant Discharge Elimination System and Municipal Separate Storm Sewer System (MS4) permits, the 2040 General Plan would not cause stormwater quality to exceed water quality objectives or standards. The incremental effects of the 2040 General Plan related to stormwater quality would not combine with development that would occur as a result of other forecasted growth to produce a cumulatively significant impact because future projects would also be required to comply with existing regulations and permits. Thus, the 2040 General Plan's incremental impacts related to stormwater quality would not be cumulatively considerable, and the project would not have a considerable contribution such that a new cumulatively significant impact related to stormwater quality would occur.

Water-Related Hazards

Projects located within about 10 to 20 feet of vertical elevation from an enclosed body of water such as a lake or reservoir are considered more likely to be exposed to a seiche hazard. Adherence to General Plan policies would ensure that future development under the 2040 General Plan as well as other cumulative development is protected from seiche hazards as well as flood and dam inundation hazards.

With implementation of BMPs required under the County's Stormwater Quality Management Program, proposed policies under the 2040 General Plan, and Area Plan requirements, future development under the 2040 General Plan would not result in substantial erosion, siltation, or flooding hazards. Because of existing laws and regulations in adjacent incorporated cities and counties, the incremental impacts of the 2040 General Plan related to erosion, siltation, and flooding would not combine with the effects of cumulative development to create a cumulatively significant impact; the cumulative impact is less than significant. The incremental impact of the 2040 General Plan would be less than cumulatively considerable.

Flood Control and Drainage

Future development under the 2040 General Plan could result in sedimentation into existing channels, altered drainage patterns, increased pollutant load, and increased rates of runoff. However, future development under the 2040 General Plan would be required to comply with the Ventura Countywide Stormwater Quality Management Program and 2040 General Plan policies and programs that would ensure that stormwater runoff from future development does not result in additional sources of polluted runoff. The incremental effects of the 2040 General Plan related to flood control and drainage would not combine with development that would occur as a result of other forecasted growth to produce a cumulatively significant impact because future projects would also be required to comply with existing laws and regulations in adjacent cities and counties addressing flood control and drainage. Therefore, the 2040 General Plan's incremental impacts related to flood control and drainage would not be cumulatively significant, and the project would not have a considerable contribution such that a new cumulatively significant impact related to flood control and drainage would occur.

Onsite Wastewater Treatment Systems

The construction of onsite wastewater treatment systems (OWTS) can result in adverse groundwater impacts and damage to the septic tank or alternative public sewer utility system.

Construction of OWTSS as part of the 2040 General Plan, however, would be required to comply with existing local regulations. The incremental effects of the 2040 General Plan related to OWTSSs would not combine with development that would occur as a result of other forecasted growth to produce a cumulatively significant impact because future projects would also be required to comply with existing local regulations. Therefore, the 2040 General Plan's incremental impacts related to OWTSSs would not be cumulatively significant, and the project would not have a considerable contribution such that a new cumulatively significant impact related to OWTSSs would occur.

5.2.11 Land Use and Planning

Impacts involving land use plans or policies and zoning generally would not combine to result in cumulative impacts. The determination of significance for impacts related to these issues is whether a project would conflict with any applicable land use plan or policy adopted for the purpose of reducing or avoiding environmental impacts. Such a conflict is site-specific; it is addressed on a project-by-project basis. Land use and physical development impacts associated with future development under the 2040 General Plan are analyzed in Section 4.11, "Land Use and Planning." As described in Section 4.11, the 2040 General Plan would be consistent with the goals of the Regional Housing Needs Assessment, RTP/Sustainable Communities Strategy, and Airport Comprehensive Land Use Plan (ACLUP) and, therefore, would not contribute to a cumulative effect due to a conflict with one or more of these regional plans. Cumulative development also would not result in conflicts with these regional plans that would result in a significant environmental effect because future cumulative projects would be required to evaluate consistency with these regional plans in separate environmental compliance documents, and to mitigate significant impacts. Other land use and planning impacts evaluated (i.e., conflict with local plans and potential to result in division of a community) are site-specific and, therefore, the project would not contribute to or result in cumulative impacts beyond the plan area. As described in Section 4.11, no significant land use and planning impacts would result from future development under the 2040 General Plan. Further, the 2040 General Plan would accommodate future development and other physical changes primarily within the Existing Community area designation (boundary) and Urban area designation (boundary). The 2040 General Plan contains numerous policies that would promote compatible land uses, architectural form and style, site design and layout, and development densities and parcel sizes within the plan area. Thus, the 2040 General Plan would not have a considerable contribution such that a new cumulatively significant land use impact would occur.

5.2.12 Mineral and Petroleum Resources

Mineral and petroleum resources impacts are discussed in Section 4.12, "Mineral and Petroleum Resources." These types of impacts are associated with land use incompatibilities or other policies that would affect access to or extraction of these resources. No significant cumulative mineral or petroleum resources impacts currently exist.

The 2040 General Plan Land Use Diagram includes residential and industrial land use designations in areas of mapped mineral resources and in oils fields and near wells. With implementation of the 2040 General Plan, future discretionary development would continue to be subject to the Mineral Resource Protection (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.

Further, the 2040 General Plan would not be anticipated to result in the loss of a known mineral resource that would be of value to the region and the residents of the State. Because of existing laws and regulations in adjacent incorporated cities and counties protecting lands underlain by mineral resources of value to the region or the State the incremental impacts of the 2040 General Plan would not combine with the effects of cumulative development to result in a cumulatively significant impact on mineral resources. Thus, because the 2040 General Plan would not adversely affect access to mineral resources, the project would not have a considerable contribution such that a new cumulatively significant mineral resources impact would occur.

Future development of residential dwellings or schools accommodated by the 2040 General Plan could preclude access to petroleum resources that are mapped and zoned for extraction because Policy COS-7.2 would increase the setback between new discretionary oil wells and residential development and schools to 1,500 feet and 2,500, respectively; this project-level impact petroleum resources access would be significant and unavoidable because there are no actions or policies that the County could feasibly mandate to fully reduce to less than significant the impact that Policy COS 7.2 would have on hampering or precluding access to petroleum resources (Impact 4.12-3). Additionally, Policies COS-7.8 and COS-7.9 could result in the loss of known petroleum resources of value to the region and the State because these policies would render a substantial quantity of petroleum resources inaccessible and result in the loss of availability in some parts of the plan area; the impact (4.12-4) would be reduced to less than significant with mitigation measures. The 2040 General 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, to result in a significant cumulative impact. Because the 2040 General Plan's impacts on hampering or precluding access to petroleum resources would remain significant and unavoidable with mitigation measures, the 2040 General Plan's impacts related to hampering or precluding access to petroleum resources would be cumulatively considerable.

5.2.13 Noise and Vibration

Noise impacts associated with future development under the 2040 General Plan are analyzed in Section 4.13, "Noise and Vibration." Noise impacts are based on factors related to site-specific and project-specific characteristics and conditions, including distance to noise sources, barriers between land uses and noise sources, and other factors. On a cumulative basis, noise impacts are typically site-specific and only combine when cumulative development is in close proximity to one another. Overall, because of existing policies and programs that regulate noise, cumulative noise impacts within the county are less than significant.

Future development under the 2040 General Plan could include the construction of residences and other noise-sensitive land uses in close proximity to existing transportation noise sources, which may be exposed to noise levels exceeding the County's standard. However, 2040 General Plan policies and implementation programs would require new development to conduct site-specific acoustical analysis and include measures to minimize noise exposure and meet County noise standards. The incremental effects of the 2040 General Plan would not combine with development that would occur as a result of future growth to produce cumulatively considerable noise impacts because future development projects would also be required to comply with County noise standards.

Future development under the 2040 General Plan would increase noise along area roadways over the life of the plan. Proposed new policies in the draft EIR would reduce traffic noise levels that exceed the County standard at existing sensitive receptors by requiring the implementation of noise reduction measures; however, there may be cases where discretionary development would result in project-generated traffic noise above the County standard, and would, therefore, result in a substantial noise level increase that would exceed County standards at existing noise-sensitive receptors. This project-level impact would be significant and unavoidable. Noise associated with traffic generated by cumulative development in incorporated cities in Ventura County and adjacent counties would combine with traffic noise generated by the 2040 General Plan to result in a significant cumulative impact. Because traffic noise impacts of the 2040 General Plan would remain significant and unavoidable even with mitigation measures, the potential for cumulative impacts related to traffic noise would be cumulatively significant, and the project would have a considerable contribution.

In addition, as discussed in Section 4.13, 2040 General Plan policies would place prohibitions on development that could be affected by noise associated with airports and stationary sources. The 2040 General Plan would be consistent with the ALCUP and would not expose any noise-sensitive receptors to aircraft noise that exceeds ACLUP standards. The incremental effects of the 2040 General Plan would not combine with development that would occur as a result of future growth to produce cumulatively considerable airport noise impacts because future development projects would also be required to be consistent with ACLUP standards.

Although individual construction projects under the 2040 General Plan would be required to minimize vibration, at this time the location, intensity, and timing of future construction activities under the 2040 General Plan, as well as relative vibration levels at nearby receptors is unknown. Even with the implementation of mitigation measures, this project-level impact would be significant and unavoidable. Due to the distribution characteristics of sound, construction noise and vibration impacts are generally site-specific and do not combine with distant projects to create cumulative effects. Nonetheless, because vibration impacts would remain significant and unavoidable even with mitigation measures, the potential for cumulative impacts related to vibration would be cumulatively significant, and the project would have a considerable contribution.

5.2.14 Population and Housing

For population and housing, the cumulative setting includes Ventura County and adjacent counties. On a cumulative basis, population and housing impacts are regulated by the County through the implementation of its General Plan, and in adjacent counties by their respective general plans. Overall, because of existing policies and programs that regulate growth and development, cumulative population and housing impacts within the County are less than significant. As discussed in Section 4.14, "Population and Housing," future development under the 2040 General Plan would not result in substantial displacement of existing residents because implementation of the policies and programs in the 2040 General Plan would ensure that future development could be accommodated within the plan area; areas where displaced housing could occur would either continue to be under residential land use designations or would add new residential areas (e.g., replace non-residential land uses) within the plan area such that a net gain in residential capacity would be achieved; and the County would continue to engage with SCAG to ensure adequate residential land is available.

Additionally, future development under the 2040 General Plan would not induce substantial population growth inside or outside of the County because General Plan policies are focused on managing and planning for the location of projected future growth within the county and maximizing efficient development patterns. Finally, the 2040 General Plan includes policies and programs to ensure adequate low-income housing for projected increases in low-income employment opportunities through the planning horizon. Therefore, the project would not have a considerable contribution such that a new cumulatively significant population and housing impact would occur.

5.2.15 Public Services and Recreation

Impacts to public services and recreation related to future development under the 2040 General Plan are analyzed in Section 4.15, “Public Services and Recreation.” This assessment includes an analysis of the need for new facilities or modification to facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools, emergency services, police protection, fire protection, and other public facilities. Public schools are provided by school districts to areas within their jurisdictions. While districts may have cross-jurisdictional boundaries, school services are still provided at the local, rather than regional, level. Law enforcement, fire protection, and emergency services are provided by local governments or fire protection districts for areas within their jurisdiction, although mutual aid agreements between agencies do help spread resources. The U.S. Forest Service and California Department of Forestry and Fire Protection provide fire protection services within many rural areas. All of these agencies are responsible for providing services to meet demand within their service areas. Cumulative public services and recreation impacts would be less than significant.

The effects of future development under the 2040 General Plan would result in environmental impacts due to the need to develop new or expanded public services and recreation facilities. The potential physical environmental impacts resulting from the construction of new or expanded public facilities within the county are evaluated within the programmatic scope of growth and future development accommodated by the 2040 General Plan. Many of the physical environmental impacts that would occur with development of public facilities, would also occur with future development in general (e.g., effects on air quality, noise, water quality). Each of these environmental impact areas has been evaluated throughout this draft EIR, and in some cases, these impacts would result in potentially significant impacts. These effects would be reduced through the implementation of mitigation measures presented throughout this draft EIR. Ultimately, the project includes policies and implementation programs that would adequately plan for necessary public services and recreational facilities to meet future growth demands. The incremental effects of the 2040 General Plan would not combine with development that would occur as a result of future growth to produce cumulatively considerable cumulative impacts because future development projects would be site-specific and would be required, by local ordinances and State regulations, to evaluate the physical environmental impacts of constructing new or expanded public services infrastructure and recreation facilities, and to mitigate any significant impacts. Thus, the project would not have a cumulatively considerable contribution such that a new cumulatively significant public services and recreation impact would occur.

5.2.16 Transportation and Traffic

Impacts to transportation and traffic related to future development under the 2040 General Plan are analyzed in Section 4.16, "Transportation and Traffic." The travel demand model used to analyze the 2040 General Plan reflects the changes to future growth patterns assumed as part of the 2040 General Plan. The VMT impact analysis relies on existing and future growth accommodated through the 2040 General Plan and accounts for the projected growth of the incorporated cities and surrounding counties. Therefore, the transportation and traffic impacts identified in Section 4.16, are inherently cumulative. The VMT and County road standards and safety impacts would remain significant and unavoidable even with mitigation measures due to the increased development, new roadways, and increased numbers of users on the county's transportation system that would result from implementation of the 2040 General Plan. Therefore, the potential for cumulative impacts related to transportation and traffic would be cumulatively significant, and the project 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 include policies and/or 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.; however, the 2040 General Plan policies address these impacts by encouraging the coordination, expansion, and access improvements of public transportation facilities.

Implementation of the 2040 General 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 is less than significant, and the 2040 General Plan would not have a cumulatively considerable contribution to a significant cumulative impact.

5.2.17 Utilities

Impacts to utilities and services related to future development under the 2040 General Plan are analyzed in Section 4.17, "Utilities." This analysis includes an examination of potential impacts related to the availability and capacity of water supply, wastewater, and solid waste disposal; the need to develop new or expanded utility infrastructure; and the potential to disrupt utility services. Development associated with the 2040 General Plan would increase demand on water supply, wastewater, and solid waste disposal. Overall, the County and the local service providers within the County are responsible for ensuring the delivery of utility services in a safe, efficient, and reliable manner based on adopted plans for growth. Therefore, no cumulatively significant utilities impacts currently exist.

Construction of New or Expanded Utility Infrastructure

The effects of future development under the 2040 General Plan would result in environmental impacts due to the need to construct new or expanded utility infrastructure. The potential physical environmental impacts resulting from the construction of new or expanded public utilities within the county are evaluated within the programmatic scope of growth and future development accommodated by the 2040 General Plan. Many of the physical environmental impacts that would occur with development of public utilities, would also occur with future development in general (e.g., effects on air quality, noise, water quality).

Each of these environmental impact areas has been evaluated throughout this draft EIR, and in some cases, these impacts would result in potentially significant impacts. These effects would be reduced through the implementation of mitigation measures presented throughout this draft EIR; however, not all potentially significant impacts of the 2040 General Plan can be reduced to less-than-significant levels, and some significant and unavoidable impacts would result. Because impacts related to the construction or expansion of utilities infrastructure would remain significant and unavoidable even with mitigation measures, the potential for cumulative impacts related to utilities infrastructure would be cumulatively significant, and the project would have a considerable contribution.

Wastewater Treatment

As discussed in Section 4.17, “Utilities,” the county is served by 16 wastewater collection, treatment, recycling, and disposal service providers, consisting of the County, county services areas, special districts, cities, and contract entities. Additional treatment capacity is generally available throughout the county with the exception of Camrosa Water District, which is nearing capacity. As described in Impact 4.17-3, implementation of the 2040 General Plan policies and implementation programs, and National Pollutant Discharge Elimination System permitting requirements would require that adequate wastewater services are provided to new development. The incremental effects of the 2040 General Plan would not combine with development that would occur as a result of future growth to produce cumulatively considerable cumulative impacts because future development projects would either be accommodated by existing infrastructure, or project proponents would be required, by local ordinances and State regulations, to make wastewater infrastructure improvements. Thus, the impacts related to wastewater treatment capacity associated with the future development under the 2040 General Plan would not be cumulatively significant when combined with the effects of other projected growth and development in the region, and the project would not have a considerable contribution such that a new significant cumulative wastewater treatment capacity impact would occur.

Water Supply

Adequate water supply is a current and ongoing concern in Ventura County due to several factors, including climate change and drought, the related declines in river flows and reservoir levels, historic overdraft of several local groundwater basins, curtailment of groundwater supplies in southern Ventura County, new groundwater well prohibitions, and reduced deliveries of imported water. This condition is indicative of an existing significant cumulative impact related to water supply. Depending on the location of new development, adequate water supplies may not be available to meet future water demands under normal, single-dry, and multiple-dry year scenarios, resulting in a potentially significant impact. Implementation of policies and programs within the 2040 General Plan would improve water supply management in the County through water conservation and water planning, and would require that all discretionary development proposals demonstrate an adequate long-term supply of water. In addition, a new program included in the 2040 General Plan would require that adequate water supplies are demonstrated during normal, single-dry, and multi-dry years prior to project approval. However, because it is not possible to conclude that adequate water supplies would be available during normal, single, and multiple dry years to meet future demand in all locations of the county for all potential project types through 2040, this project-level impact would remain significant and unavoidable. Because impacts related to water supply would remain significant and unavoidable even with mitigation measures, the potential for cumulative water supply impacts would be cumulatively significant, and the project would have a considerable contribution.

Solid Waste

As discussed, Section 4.17, "Utilities," there are two active solid waste disposal/landfill sites in the county: Toland Road Landfill and Simi Valley Landfill and Recycling Center; and, two landfills located outside of the county that accept waste from Ventura County: Calabasas Landfill and Chiquita Canyon Landfill. The estimated useful life of these landfills range from 2027 to 2052. Future development under the 2040 General Plan would contribute to an increase in solid waste generation and need for disposal of solid waste at landfills that serve Ventura County. The increase in solid waste generation would represent a small portion of the total throughput available at landfills that accept solid waste from Ventura County. However, there is substantial capacity available at the landfills, and policies included in the 2040 General Plan would reduce disposal rates to landfills, which could in turn promote an extension of the facilities' useful life. The incremental effects of the 2040 General Plan would not combine with development that would occur as a result of future growth to produce cumulatively considerable cumulative impacts because there is substantial capacity available at the landfills; General Plan policies would reduce disposal rates to landfills; and future projects would be required to comply with federal, State, and local statutes and regulations related to solid waste. Thus, impacts related to landfill disposal capacity associated with the 2040 General Plan would not be cumulatively significant, and the project would not have a considerable contribution such that a new cumulatively significant landfill impact would occur.

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6 ALTERNATIVES

6.1 INTRODUCTION

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

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

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

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

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

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

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

6.2 2040 GENERAL PLAN DEVELOPMENT

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

6.3 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

6.3.1 Attainment of Project Objectives

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

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

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

6.3.2 Environmental Impacts of the 2040 General Plan

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

SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE 2040 GENERAL PLAN

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

Agriculture and Forestry Resources:

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

Air Quality:

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

Biological Resources:

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

Cultural, Tribal Cultural, and Paleontological Resources:

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

Greenhouse Gas Emissions:

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

Hazards, Hazardous Materials, and Wildfire:

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

Mineral and Petroleum Resources

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

Noise and Vibration

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

Public Services and Recreation:

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

Transportation and Traffic:

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

Utilities:

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

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

Aesthetics, Scenic Resources, and Light Pollution:

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

Air Quality:

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

Mineral and Petroleum Resources:

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

Public Services and Recreation:

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

Transportation and Traffic:

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

6.4 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

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

6.4.1 Alternative Locations

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

REASONS FOR REJECTION

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

6.4.2 No Development Alternative

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

REASONS FOR REJECTION

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

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

6.4.3 Downzoning Alternative

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

REASONS FOR REJECTION

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

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

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

REASONS FOR REJECTION

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

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

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

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

6.4.6 Carbon Neutrality Alternative

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

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

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

REASONS FOR REJECTION

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

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

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

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

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

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

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

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

6.5 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

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

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

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

6.5.1 Alternative 1: No Project-No General Plan Update

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

COMPARISON OF SIGNIFICANT ENVIRONMENTAL EFFECTS

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

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

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

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

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

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

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

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

CONSISTENCY WITH PROJECT OBJECTIVES

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

6.5.2 Alternative 2: Existing Community and Urban Area Designations Alternative

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

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

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

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

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

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

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

COMPARISON OF SIGNIFICANT ENVIRONMENTAL EFFECTS

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

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

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

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

CONSISTENCY WITH PROJECT OBJECTIVES

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

6.5.3 Alternative 3: Dense Cores Alternative

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

COMPARISON OF SIGNIFICANT ENVIRONMENTAL EFFECTS

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

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

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

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

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

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

CONSISTENCY WITH PROJECT OBJECTIVES

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

6.5.4 Alternative 4: Zero Net Energy Buildings Alternative

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

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

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

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

COMPARISON OF SIGNIFICANT ENVIRONMENTAL EFFECTS

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

CONSISTENCY WITH PROJECT OBJECTIVES

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

6.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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

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

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

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

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

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

SU = significant and unavoidable impacts

LTS = less-than-significant impacts

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

7 OTHER CEQA CONSIDERATIONS

This chapter discusses the potential to induce growth and significant and irreversible impacts on the environment. These are other issues for which CEQA requires analysis in addition to the specific issue areas discussed in Chapter 4, “Environmental Impact Analysis.”

7.1 GROWTH-INDUCING IMPACTS

In accordance with Section 15126.2(e) of the State CEQA Guidelines, “an EIR must discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” In addition, when discussing growth-inducing impacts of a proposed project, “it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment” (CEQA Guidelines, Section 15126.2(e)).

The following discusses ways in which the 2040 General Plan could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. Although growth inducement itself is not considered an environmental effect, it could potentially lead to environmental effects. In general, a project may foster spatial, economic, or population growth in a geographic area if the project removes an impediment to growth (e.g., the establishment of an essential public service, the provision of new access to an area, a change in zoning or general plan land use designation) or if economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base and employment expansion).

7.1.1 Population and Economic Growth

As discussed in Chapter 3, “Project Description,” the project is a comprehensive update to the Ventura County General Plan that establishes the community’s vision for the development of Ventura County through the year 2040 and will serve as the fundamental land use policy document for the County. It is important to acknowledge that the 2040 General Plan would not facilitate growth in the county; rather, it is intended to shape the location and type of development that would otherwise occur on land zoned and planned for certain uses. The 2040 General Plan would concentrate future growth in the county within Existing Community area designation (boundary) and Urban area designation (boundary), and the 2040 General Plan would not make changes to unincorporated areas within city spheres of influence, which are the probable future growth areas of the incorporated cities.

The growth projections used in the 2040 General Plan and this draft EIR are derived from forecasts published by the Southern California Association of Governments (SCAG) for the 2020 Regional Transportation Plan and Sustainable Communities Strategy (SCAG 2017). The SCAG forecast includes a net increase by 2040 of 4,099 people and 1,281 households above existing conditions (year 2015) that would be accommodated through incremental build-out of

the 2040 General Plan (as shown in Table 3-3 in Chapter 3, “Project Description”). This represents an approximately 4 percent increase in population and households by 2040 relative to existing conditions (2015).

The unincorporated county is also projected to have 2,986 additional employment opportunities by 2040. This would foster economic sustainability within the County. It would also result in greater employment-generating uses that may generate a secondary demand for goods and services to support new and expanding businesses. Thus, the 2040 General Plan would accommodate future development that could result in economic growth; however, the growth would be consistent with the regional growth forecasts that have been adopted for the County.

As described further in Section 4.14, “Population and Housing,” growth would be expected to occur without implementation of the 2040 General Plan. The philosophy of the 2040 General Plan is that the County would be prepared and able to accommodate forecasted growth, while adhering to policies that define where and how development would occur.

7.1.2 Removal of Obstacles to Growth

Growth in an area may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack of essential public services (e.g., water service), while planning impediments may include restrictive zoning and/or general plan designations.

The 2040 General Plan concentrates growth within the Existing Community area designation (boundary) and Urban area designation (boundary), which could intensify the uses over what currently exists in some areas. The 2040 General Plan would not, however, alter the Agricultural, Open Space, or Rural land use designations located outside of Existing Community and Urban area designations (consistent with the Save Open Space & Agricultural Resources [SOAR] initiative).

In general, and subject to certain exceptions, SOAR requires countywide voter approval of any (1) substantive change to the 2040 General Plan’s Agricultural, Open Space, or Rural land use goals or policies, and (2) redesignation of land with Agricultural, Open Space, or Rural land use designations. In November 2016, Ventura County voters renewed the County’s SOAR initiative and extended its provisions through 2050. Similarly, voters in eight of the county’s 10 cities renewed SOAR initiatives adopted by the respective jurisdictions that are applicable within their boundaries (the cities of Ojai and Port Hueneme have not adopted SOAR measures). SOAR measures within cities establish voter-controlled urban growth boundaries, known as City Urban Restriction Boundaries. The County SOAR initiative’s Agricultural, Open Space, and Rural goals and policies are included in the 2040 General Plan with only technical, non-substantive revisions for clarification and internal consistency with the rest of the 2040 General Plan.

The County of Ventura, cities within the county, and the Ventura Local Agency Formation Commission (LAFCo) adopted the Guidelines for Orderly Development to direct urban-level development and services to the incorporated cities. Through Policies LU-1.1 and LU-2.1 in the 2040 General Plan, the County would continue to work with these entities to promote and maintain reasonable city boundaries and spheres of influence to prevent growth-inducing

urban development in unincorporated areas, and require unincorporated urban development to be located in areas designated as Existing Communities and unincorporated urban centers consistent with the Guidelines for Orderly Development.

Similarly, greenbelt agreements, voluntary agreements between the County and one or more cities, are used to limit development of agricultural and/or open space areas within the unincorporated county. Through greenbelt agreements, cities express their commitment to not annex any property within a greenbelt while the County expresses its commitment to restrict development to uses consistent with existing agricultural or open space zoning. There are seven greenbelts in Ventura County totaling approximately 164,000 acres. The existing greenbelt agreements between the County and incorporated cities would be unaffected by adoption of the 2040 General Plan.

The 2040 General Plan includes policies and implementation programs to develop and maintain infrastructure to accommodate forecasted growth. This includes public facilities and services, transportation infrastructure, wastewater treatment and disposal, public utilities, electricity, and parks and recreation facilities. Future development consistent with the 2040 General Plan could necessitate the construction of additional distribution and collection systems in areas that are not currently served by public utilities. In addition, it is anticipated that upgrading/upsizing of existing utilities could occur in areas where there is significant reinvestment in vacant or underutilized areas. It is expected that utilities would be appropriately sized to accommodate future development, rather than oversizing for unforeseen development, which would be more costly and not supported by forecasted growth estimates.

7.1.3 Conclusion

Planning documents, such as general plans, serve as blueprints for future population and job growth that is projected to occur. The 2040 General Plan is designed to accommodate forecasted growth in population and jobs in the county by 2040. For the plan area, this increase is anticipated to be 4,099 additional residents, 1,281 housing units, and 2,986 additional employment opportunities by 2040 (or approximately 164 people, 51 housing units, and 119 jobs per year, averaged over the 25-year period between 2015 and the 2040 planning horizon). The 2040 General Plan includes a comprehensive policy framework designed, in large part, to control and focus forecasted growth and minimize potential environmental impacts associated with that growth. The 2040 General Plan does not include land use designations or policies or implementation programs that would promote growth beyond population projections. Therefore, because growth in the county will occur with or without approval of the 2040 General Plan, and because the 2040 General Plan would not in and of itself induce growth, but rather would control and focus growth, impacts related to growth inducement would be **less than significant**.

7.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

Section 15126.2(d) of the CEQA Guidelines requires a discussion of significant irreversible environmental changes that could result from implementation of the 2040 General Plan. Generally, a project would result in significant irreversible environmental changes if:

- ▶ the primary and secondary impacts would commit future generations to similar uses;

- ▶ the nature of the project would involve uses that could result in irreversible damage associated with potential environmental accidents;
- ▶ the project would involve a large commitment of nonrenewable resources; or
- ▶ the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

The 2040 General Plan would result in the long-term commitment of resources as a result of future development. While it would concentrate future development within the Existing Community area designation (boundary) and Urban area designation (boundary), the 2040 General Plan would allow future development in undeveloped areas that result in the conversion of undeveloped land to urbanized or other developed uses. These conversions are considered a permanent irreversible change and would occur directly through construction of land uses, infrastructure, and other physical improvements on undeveloped land. Future development could result in significant irreversible loss of sensitive vegetation communities that support rare, threatened, or endangered species, and impacts to these resources would be significant and irreversible. Direct loss of Important Farmland or classified farmland that could occur during 2040 General Plan implementation would also be significant and irreversible. Greenhouse gas emissions generated as a result of future development would be significant and irreversible because they would persist in the atmosphere well beyond the 2040 horizon year.

Construction and operational activities associated with future development under the 2040 General Plan would result in the irreversible consumption of nonrenewable resources, such as gasoline and diesel for on-road transportation and stationary engines and equipment, natural gas for space heating, cooking, and generating electricity, and water resources for indoor plumbing and outdoor landscaping. The irreversible commitment of limited resources is inherent in any development project, or in this case, a program of future development projects. Resources anticipated to be irreversibly committed over the horizon of the 2040 General Plan include but are not limited to: lumber and other forest products; sand, gravel, asphalt, and concrete; petrochemicals; construction materials; and steel, copper, lead, and other metals. As described in Section 4.6, “Energy,” the construction and operational activities associated with future development under the 2040 General Plan would not result in wasteful, inefficient, or unnecessary consumption of energy. The permanent and irreversible changes to the existing physical environment as a result of the 2040 General Plan have been described throughout this draft EIR.

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the project. While future development under the 2040 General Plan could result in the use, transport, storage, and disposal of hazardous wastes, as described in Section 4.9, “Hazards, Hazardous Materials, and Wildfire,” all such activities would be required to comply with applicable State and federal laws that strictly regulate transport, use, disposal, and storage of hazardous materials, which significantly reduces the likelihood and severity of accidents that could result in irreversible environmental damage.

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