

**FINAL
MITIGATED NEGATIVE DECLARATION
PRESSURE ZONE 538
RESERVOIR REPLACEMENT PROJECT**



Lead Agency:

Ventura County Public Works Water and Sanitation

6767 Spring Road

Moorpark, California, 93020

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FINAL MITIGATED NEGATIVE DECLARATION FOR THE PRESSURE ZONE 538 RESERVOIR REPLACEMENT PROJECT

PROJECT DESCRIPTION

The existing Pressure Zone 538 Reservoir is composed of a welded steel tank approximately 39 feet in diameter and 24 feet tall. The tank is painted green and is located within an 0.38 acre easement on APN 163-0-010-27. The reservoir site is fenced with chain-link fencing, and includes associated piping, valves and pumps. The site is accessed from a paved agricultural road along the east side of the easement.

The proposed project consists of the removal of the existing 210,000-gallon Pressure Zone 538 Reservoir and replacement with two 300,000 gallon above-ground tanks within the existing easement. Figure 2 provides a site plan for the tanks and associated facilities. The proposed project would be constructed in three phases:

- Phase 1. Construction of the common tank pad and Tank 1 to serve the Somis Ranch Farmworker Housing Project (about 12 months).
- Phase 2. Construction of the booster pump station (about nine months).
- Phase 3. Construction of Tank 2 to serve existing Waterworks District No. 19 customers (about 12 months).

Phase 1. Tank 1 would be constructed of steel, approximately 40.5 feet in diameter and 39 feet tall, and located on a level pad (539 feet in elevation) in the western portion of the existing easement (see Figure 2). Tank 1 would be painted green. This pad would be designed to accommodate later construction of Tank 2. Water inlet-outlet pipes (12-inch diameter) would be provided and connect to the existing pipelines near the existing access road along the eastern boundary of the easement.

The common tank pad would be surrounded by a curb and gutter and provided with a storm drain system comprised of V-ditches located on the south (upslope) side of the pad, and 8-inch diameter storm drain pipes that would discharge to a grouted riprap outlet structure at the northern corner of the easement. The tank overflow and drain/flush piping would connect to the storm drain system. Security lighting would be provided around the perimeter of the tank pad.

A two-foot-high retaining wall would be constructed along the eastern boundary of the tank pad. The tank pad would be surrounded with six-foot-high chain-link fencing with three strands of barbed wire at the top. The area surrounding Tank 1 and a 12-foot-wide driveway connecting to the existing access road would be paved with asphalt concrete.

Phase 2. The booster pump station would be constructed in Phase 2 in the southeastern corner of the existing easement (see Figure 2), following completion of construction of Tank 1. The booster pump station would consist of three pumps driven by 75 horsepower electric motors. One of the pumps would be designed as standby and not regularly used. The pumps would be used to fill the tanks as needed, typically during off peak hours (evening and nighttime) when electricity rates are lower. The estimated electrical demand for two pumps operating is 154 kilowatts. The operation of the pump station would vary seasonally and partially dependent on the implementation of the Somis Ranch Farmworker Housing Project. For the purposes of impact assessment, it was assumed the two pumps would operate an average of 8 hours per week. Security lighting would be provided at the booster pump station.

Phase 3. Tank 2 would be constructed of steel in the eastern portion of the existing easement, approximately 40.5 feet in diameter and 39 feet tall, and located on the level pad constructed in Phase 1. Tank 2 would be painted green. A retaining wall would be constructed along the southern boundary of the tank pad. Water inlet-outlet pipes (12-inch diameter) would be provided and connect to the existing pipelines near the existing access road along the eastern boundary of the easement. The tank overflow and drain/flush piping would connect to the storm drain system constructed during Phase 1. The driveway serving Tank 1 would be removed to provide space for Tank 2. The area surrounding Tank 2 would be paved with asphalt concrete.

A 350-kilowatt diesel engine-driven emergency generator would be installed in the southern portion of the existing easement (see Figure 2). The emergency generator would be provided with a 200-gallon integral diesel fuel tank located under the unit. The emergency generator would operate up to 24 hours per year for testing purposes.

Construction. Site preparation would involve tank pad construction including rough grading, excavation, and over-compaction in accordance with the recommendations of the project-specific geotechnical report (Geotechnical Report District 19 538 Pressure Zone Reservoir Project, Somis, California) prepared by Oakridge Geoscience (September 2021). The common tank pad would be constructed, and a concrete ring wall would be installed. Both tanks would be assembled on-site. Water and storm drain piping would then be installed. Traffic control measures would be used when construction activities may affect traffic flow on Worth Way or Upland Road. Temporary lane closure may be necessary during short periods when heavy equipment and materials are brought to the site. Standard traffic control methods acceptable to the Ventura County Public Works Agency would be implemented.

PROJECT LOCATION

The project site comprises the existing 0.38 acre tank site easement held by Ventura County in the southeast corner of APN 163-0-010-27. The tank site is located in unincorporated Ventura County near the community of Somis, approximately 1.25 miles southeast of the State Route 118/State Route 34 intersection (see Figure 1).

PROJECT PROPONENT AND LEAD AGENCY

Ventura County Public Works Water and Sanitation Department
P.O. Box 250
6767 Spring Road
Moorpark, California 93020

Contact: Ryan Lippincott (805) 378-3018

PROPOSED FINDINGS

The Water and Sanitation Department has prepared this Mitigated Negative Declaration (MND) pursuant to Sections 15070-15075 of the State Guidelines for the Implementation of the California Environmental Quality Act and the County of Ventura Administrative Supplement to the State CEQA Guidelines. This Mitigated Negative Declaration documents the Water and Sanitation Department's finding that there are no significantly adverse unavoidable impacts associated with the proposed project, and the project does not require the preparation of an Environmental Impact Report (EIR). The attached Initial Study identifies and discusses potential impacts, mitigation measures and residual impacts for identified subject areas.

PUBLIC COMMENTS

In compliance with Section 15073 of the State Guidelines for the Implementation of the California Environmental Quality Act, the Water and Sanitation Department accepted written comments on the adequacy of the information contained in the Draft MND during the public review period (June 16 through July 18, 2022). This Final MND includes public comments and responses to these comments (see Appendix B).

Due to the non-complex nature of this project, a separate environmental hearing will not be held. However, public testimony will be accepted at the MND approval hearing before the Board of Supervisors. For information regarding scheduling of this hearing, please contact Mr. Ryan Lippincott at (805) 378-3018.

MITIGATION MEASURES

The following mitigation measures have been integrated into the proposed project and would reduce impacts to a level of less than significant.

Air Quality

Air pollutant emissions reduction measures recommended by the Ventura County Air Pollution Control District (APCD) Air Quality Assessment Guidelines (revised 2003) have been incorporated into the project including:

- The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive 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 water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.

- All trucks shall be required to cover their loads as required by California Vehicle Code §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 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 shall be seeded and watered until plant 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 the APCD in determining 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, shall be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.
- Material stockpiles shall be enclosed, covered, stabilized, or otherwise treated as needed to prevent blowing fugitive dust off site.
- All project construction and site preparation operations shall be conducted in compliance with all applicable APCD Rules and Regulations with emphasis on Rule 50 (Opacity), Rule 51 (Nuisance), Rule 55 (Fugitive Dust) and Rule 10 (Permits Required).
- Signs displaying the APCD complaint line telephone number (805/303-3700 during business hours; 805/303-3708 after hours) shall be posted in a prominent location visible to the public.
- Off-road construction equipment shall utilize engines certified to the Federal Emissions Standard Category of Tier 3 or Tier 4, if available.

Archaeological Resources

The following mitigation measures have been incorporated into the project to prevent significant impacts, should resources be found during project-related earthwork:

- Should any buried archaeological materials be uncovered during project activities, such activities shall cease within 100 feet of the find. Prehistoric archaeological indicators include obsidian and chert flakes, chipped stone tools, bedrock outcrops and boulders with mortar cups, ground stone implements, locally darkened midden soils containing previously listed items plus fragments of bone and fire affected stones. Historic period site indicators may include fragments of glass, ceramic and metal objects, milled and split timber, building foundations, privy pits, wells and dumps, and old trails. All earth disturbing work within 100 feet of the find shall be temporarily suspended or redirected until Water and Sanitation has been notified and a qualified archaeologist meeting Secretary of Interior standards has completed an assessment of the find. Work on portions of the Project outside of the assessment area may continue during this assessment period. The appropriate tribes (including the Fernandeano Tataviam Band of Mission Indians) shall be contacted regarding the findings of the assessment, to provide tribal input with regards to significance and treatment.
- Should the find be deemed significant, as defined under the State CEQA Guidelines, Water and Sanitation shall retain a professional Native American monitor to observe all remaining ground-disturbing activities in proximity to the find including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work. After the find has been appropriately mitigated, work in the area may resume.
- Water and Sanitation shall, in good faith, consult with affected tribes (including the Fernandeano Tataviam Band of Mission Indians) on the disposition and treatment of any tribal cultural resources encountered.
- If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and deposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission.

Implementation of these measures would minimize potential adverse effects to discovered cultural resources and human remains, which would reduce archaeological resources impacts to a level of less than significant.

MITIGATION MONITORING AND REPORTING

Section 15074(d) of the State Guidelines for the Implementation of the California Environmental Quality Act and Section 21081.6 of the Public Resources Code, requires the lead agency (Water and Sanitation Department) to adopt a monitoring program to ensure mitigation measures are complied with during implementation of the project. In compliance with these requirements, a Mitigation Monitoring Program Implementation Table is provided below. This Table identifies the timing, monitoring methods, responsibility and compliance verification method for all mitigation measures identified in this MND. Monitoring would be conducted by the Water and Sanitation Department's project manager and qualified specialists under contract to the Water and Sanitation Department.

**PRESSURE ZONE 538 RESERVOIR REPLACEMENT PROJECT
MITIGATION MONITORING PROGRAM – IMPLEMENTATION TABLE**

Mitigation Measure	Implementation Timing	Monitoring Methods	Monitoring Frequency	Party Responsible for Monitoring	Method of Compliance Verification	Verification of Compliance		
						Signature	Date	Remarks
AIR QUALITY								
The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust.	Throughout the construction period	The construction inspector will observe work in progress	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will review inspection reports			
Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities	Throughout the construction period	The construction inspector will observe work in progress	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will review inspection reports			
All trucks shall be required to cover their loads as required by California Vehicle Code §23114.7.	Throughout the construction period	The construction inspector will observe work in progress	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will review inspection reports			
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.	Throughout the construction period	The construction inspector will inspect roadways and other exposed soils for excessive dust generation	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will review inspection reports			

**PRESSURE ZONE 538 RESERVOIR REPLACEMENT PROJECT
MITIGATION MONITORING PROGRAM – IMPLEMENTATION TABLE**

Mitigation Measure	Implementation Timing	Monitoring Methods	Monitoring Frequency	Party Responsible for Monitoring	Method of Compliance Verification	Verification of Compliance		
						Signature	Date	Remarks
AIR QUALITY (Continued)								
Graded and/or excavated inactive areas of the construction site shall be monitored 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	Throughout the construction period	The construction inspector will inspect dust control efforts and order additional measures as needed	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will review inspection reports			
Signs shall be posted on-site limiting off-road traffic speed to 15 miles per hour or less	Throughout the construction period	The construction inspector will ensure signs are posted and maintained	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will review inspection reports			
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 the APCD in determining when winds are excessive	Throughout the construction period	The construction inspector will coordinate with site supervisor to curtail construction operations as needed during high wind periods	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will review inspection reports			
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	Throughout the construction period	The construction inspector will ensure roads are swept as needed	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will review inspection reports			

**PRESSURE ZONE 538 RESERVOIR REPLACEMENT PROJECT
MITIGATION MONITORING PROGRAM – IMPLEMENTATION TABLE**

Mitigation Measure	Implementation Timing	Monitoring Methods	Monitoring Frequency	Party Responsible for Monitoring	Method of Compliance Verification	Verification of Compliance		
						Signature	Date	Remarks
AIR QUALITY (Continued)								
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	Throughout the construction period	The construction inspector will observe work in progress	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will review inspection reports			
Material stockpiles shall be enclosed, covered, stabilized, or otherwise treated as needed to prevent blowing fugitive dust off-site.	Throughout the construction period	The construction inspector will observe work in progress	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will review inspection reports			
All project construction and site preparation operations shall be conducted in compliance with all applicable Ventura County APCD Rules and Regulations with emphasis on Rule 50 (Opacity), Rule 51 (Nuisance), Rule 55 (Fugitive Dust) and Rule 10 (Permits Required).	Throughout the construction period	The construction inspector will observe work in progress	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will review inspection reports			
Signs displaying the APCD complaint line telephone number (805/303-3700 during business hours; 805/303-3708 after hours) shall be posted in a prominent location visible to the public.	Throughout the construction period	The construction inspector will ensure the signage is in place	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will review inspection reports			
Off-road construction equipment shall utilize engines certified to the Federal Emissions Standard Category of Tier 3 or Tier 4, if available.	Throughout the construction period	The construction inspector will ensure appropriate engines are used	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will review inspection reports			

**PRESSURE ZONE 538 RESERVOIR REPLACEMENT PROJECT
MITIGATION MONITORING PROGRAM – IMPLEMENTATION TABLE**

Mitigation Measure	Implementation Timing	Monitoring Methods	Monitoring Frequency	Party Responsible for Monitoring	Method of Compliance Verification	Verification of Compliance		
						Signature	Date	Remarks
CULTURAL RESOURCES								
Should any buried archaeological materials be uncovered during project activities, such activities shall cease within 100 feet of the find. Prehistoric archaeological indicators include obsidian and chert flakes, chipped stone tools, bedrock outcrops and boulders with mortar cups, ground stone implements, locally darkened midden soils containing previously listed items plus fragments of bone and fire affected stones. Historic period site indicators may include fragments of glass, ceramic and metal objects, milled and split timber, building foundations, privy pits, wells and dumps, and old trails. All earth disturbing work within 100 feet of the find shall be temporarily suspended or redirected until Water and Sanitation has been notified and a qualified archaeologist meeting Secretary of Interior standards has completed an assessment of the find. Work on portions of the Project outside of the assessment area may continue during this assessment period. The appropriate tribes (including the Fernandefio Tataviam Band of Mission Indians) shall be contacted regarding the findings of the assessment, to provide tribal input with regards to significance and treatment.	Throughout the construction period	The construction inspector will observe work in progress and ensure work is suspended as appropriate, the project manager will ensure evaluation of the find is completed	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will prepare an incident report to be included in the project inspection report			
Should the find be deemed significant, as defined under the State CEQA Guidelines, Water and Sanitation shall retain a professional Native American monitor to observe all remaining ground-disturbing activities in proximity to the find including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work. After the find has been appropriately mitigated, work in the area may resume.	When cultural resources are encountered	The Project manager shall ensure Native American monitors are utilized as required	Following discovery of the find	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will prepare an incident report to be included in the project inspection report			

**PRESSURE ZONE 538 RESERVOIR REPLACEMENT PROJECT
MITIGATION MONITORING PROGRAM – IMPLEMENTATION TABLE**

Mitigation Measure	Implementation Timing	Monitoring Methods	Monitoring Frequency	Party Responsible for Monitoring	Method of Compliance Verification	Verification of Compliance		
						Signature	Date	Remarks
Water and Sanitation shall, in good faith, consult with affected tribes (including the Fernandeño Tataviam Band of Mission Indians) on the disposition and treatment of any tribal cultural resources encountered.	When cultural resources are encountered	The Project manager shall ensure affected tribes are contacted as needed	Following discovery of the find	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will document tribal contacts and responses			
If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and deposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission.	Throughout the construction period	The construction inspector will observe work in progress and ensure work is suspended as appropriate, the project manager will notify the coroner	Initially and weekly thereafter	Ventura County Water and Sanitation Department	Water and Sanitation Department staff will prepare an incident report to be included in the project inspection report			

1.0 INTRODUCTION

1.1 PURPOSE AND LEGAL AUTHORITY

An Initial Study has been prepared for the Pressure Zone 538 Reservoir Replacement Project (proposed project), which has been proposed by the Ventura County Public Works Agency Water and Sanitation Department, the project proponent. Section 2.0 of this document provides a description of the proposed project. Water and Sanitation is also the “lead agency” for the proposed project. As defined by Section 15367 of the State California Environmental Quality Act (CEQA) Guidelines, the lead agency is “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant impact on the environment.” Based on the findings of the Impact Analysis (Section 4.0 of this Initial Study), it has been determined that the project would not have a significant impact on the environment. As such, a Mitigated Negative Declaration has been prepared for the project in accordance with CEQA.

1.2 PROJECT PROPONENT AND LEAD AGENCY

Ventura County Public Works Agency Water and Sanitation
6767 Spring Road
Moorpark, California 93020

Contact: Ryan Lippincott, (805) 378-3018

1.3 PROJECT LOCATION

The project site comprises the existing 0.38 acre tank site easement held by Ventura County in the southeast corner of APN 163-0-010-27. The tank site is located in unincorporated Ventura County near the community of Somis, approximately 1.25 miles southeast of the State Route 118/State Route 34 intersection (see Figure 1).

1.4 BACKGROUND

1.4.1 Waterworks District No. 19

Ventura County Waterworks District No. 19 (District) was created on November 4, 1980 and serves approximately 3,275 customers through 1,085 service connections. The District service area encompasses 14,400 acres and includes the Somis community and surrounding rural areas.

The District’s water supply comes from both imported and local sources. In 2020, 12 percent of its water supply came from the State Water Project via the Calleguas Municipal Water District. Local water is pumped from the Las Posas Basin by three groundwater wells owned and operated by the District. These wells produced approximately 88 percent of the District’s total supply in 2020. The District treats the water that is pumped from the wells, and then delivers it to its customers. Local and imported water is delivered through the District’s distribution system, which consists of eight reservoirs, seven booster pump stations, and approximately 46 miles of water lines. In 2020, the District supplied approximately 2,131 acre-feet of water for agricultural residential, industrial, commercial, institutional and fire protection purposes.

1.4.2 Existing Tank

The project site currently supports an above-ground 210,000-gallon welded steel water tank constructed in 1975. The tank stores potable water for distribution to the Somis area, including agricultural commercial and domestic customers.

1.5 PROJECT PURPOSE

The purpose of the project is to increase the storage capacity for the 538 Pressure Zone and provide storage capacity to serve the Somis Ranch Farmworker Housing Project to be constructed at 2789 Somis Road in Somis.

1.6 PREPARERS OF THE INITIAL STUDY

This document was prepared for Water and Sanitation by the following persons:

- Padre Associates: Matt Ingamells, Project Manager/Senior Biologist
- Padre Associates: Rachael Letter, Senior Archaeologist
- Padre Associates: Lucas Bannon, GIS Specialist

2.0 PROJECT DESCRIPTION

2.1 EXISTING FACILITIES

The existing Pressure Zone 538 Reservoir is composed of a welded steel tank approximately 39 feet in diameter and 24 feet tall. The tank is painted green and is located within an 0.38 acre easement on APN 163-0-010-27. The reservoir site is fenced with chain-link fencing, and includes associated piping, valves and pumps. The site is accessed from a paved agricultural road along the east side of the easement. Currently, a portable electrical generator is located at the site. The reservoir site is not lighted; however, a light is provided on the power pole located approximately 30 feet south of the site.

2.2 PROJECT CHARACTERISTICS

The proposed project consists of the removal of the existing 210,000-gallon tank and replacement with two 300,000 gallon above-ground tanks within the existing easement. Figure 2 provides a site plan for the tanks and associated facilities. The proposed project would be constructed in three phases:

- Phase 1. Construction of the common tank pad and Tank 1 to serve the Somis Ranch Farmworker Housing Project (about 12 months).
- Phase 2. Construction of the booster pump station (about nine months).
- Phase 3. Construction of Tank 2 to serve existing District customers (about 12 months).

2.2.1 Phase 1

Tank 1 would be constructed of steel, approximately 40.5 feet in diameter and 39 feet tall, and located on a level pad (539 feet in elevation) in the western portion of the existing easement (see Figure 2). Tank 1 would be painted green. This pad would be designed to accommodate later construction of Tank 2. Water inlet-outlet pipes (12-inch diameter) would be provided and connect to the existing pipelines near the existing access road along the eastern boundary of the easement.

The common tank pad would be surrounded by a curb and gutter and provided with a storm drain system comprised of V-ditches located on the south (upslope) side of the pad, and 8-inch diameter storm drain pipes that would discharge to a grouted riprap outlet structure at the northern corner of the easement. The tank overflow and drain/flush piping would connect to the storm drain system. Security lighting would be provided around the perimeter of the tank pad.

A two-foot-high retaining wall would be constructed along the eastern boundary of the tank pad. The tank pad would be surrounded with six-foot-high chain-link fencing with three strands of barbed wire at the top. The area surrounding Tank 1 and a 12-foot-wide driveway connecting to the existing access road would be paved with asphalt concrete.

2.2.2 Phase 2

The booster pump station would be constructed in Phase 2 in the southeastern corner of the existing easement (see Figure 2), following completion of construction of Tank 1. The booster pump station would consist of three pumps driven by 75 horsepower electric motors. One of the pumps would be designed as standby and not regularly used. The pumps would be used to fill the tanks as needed, typically during off peak hours (evening and nighttime) when electricity rates are lower. The estimated electrical demand for two pumps operating is 154 kilowatts. The operation of the pump station would vary seasonally and partially dependent on the implementation of the Somis Ranch Farmworker Housing Project. For the purposes of impact assessment, it was assumed the two pumps would operate an average of 8 hours per week. Security lighting would be provided at the booster pump station.

2.2.3 Phase 3

Tank 2 would be constructed of steel in the eastern portion of the existing easement, approximately 40.5 feet in diameter and 39 feet tall, and located on the level pad constructed in Phase 1. Tank 2 would be painted green. A retaining wall would be constructed along the southern boundary of the tank pad. Water inlet-outlet pipes (12-inch diameter) would be provided and connect to the existing pipelines near the existing access road along the eastern boundary of the easement. The tank overflow and drain/flush piping would connect to the storm drain system constructed during Phase 1. The driveway serving Tank 1 would be removed to provide space for Tank 2. The area surrounding Tank 2 would be paved with asphalt concrete.

A 350-kilowatt diesel engine-driven emergency generator would be installed in the southern portion of the existing easement (see Figure 2). The emergency generator would be provided with a 200-gallon integral diesel fuel tank located under the unit. The emergency generator would operate up to 24 hours per year for testing purposes. The emergency generator engine would require a permit to construct and permit to operate from the Ventura County Air Pollution Control District (APCD). Since the engine would operate less than 200 hours per year it would be exempt from the emissions limitations of APCD Rule 74.9.

2.3 PROJECT CONSTRUCTION

2.3.1 Methods

Site preparation would involve tank pad construction including rough grading, excavation, and over-compaction in accordance with the recommendations of the project-specific geotechnical report (Geotechnical Report District 19 538 Pressure Zone Reservoir Project, Somis, California) prepared by Oakridge Geoscience (September 2021). The common tank pad would be constructed, and a concrete ring wall would be installed. Both tanks would be assembled on-site. Water and storm drain piping would then be installed.

Estimates of cut, fill, import and export volumes for tank pad construction are provided in Table 1. It is anticipated that about 147 truck round trips would be required for mobilization and demobilization of equipment, import of construction materials, import of earth fill materials and export of tank demolition materials (Table 2). Worker vehicle trips would also be generated during the construction period.

Table 1. Estimate of Cut/Fill and Import/Export Earthwork Volumes

Parameter	Volume (cubic yards)
Estimated cut volume	172
Estimated fill volume	420
Import volume (difference)	248

Table 2. Estimate of Construction-related Truck Round Trips (all phases)

Task	Round Trips
Construction equipment transportation	10
Materials transportation (steel, concrete, aggregate, pipe, valves, pumps, electrical components, emergency generator)	100
Import earth materials	17*
Export tank demolition materials/sold waste	20
Total	147

*Average load of 15 cubic yards per truck trip

Traffic control measures would be used when construction activities may affect traffic flow on Worth Way or Upland Road. Temporary lane closure may be necessary during short periods when heavy equipment and materials are brought to the site. Standard traffic control methods acceptable to the Ventura County Public Works Agency would be implemented.

2.3.2 Equipment

The construction equipment anticipated to be required for the proposed project is listed below. Equipment likely to be required for the tank and pump station construction includes:

- Wheeled loader
- Backhoe
- Roller
- Dozer
- Grader
- Welding machines
- Tracked excavator
- Water truck
- Dump truck
- Crane
- Concrete truck
- Delivery trucks (equipment, materials)

2.3.3 Manpower

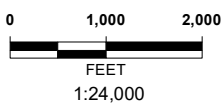
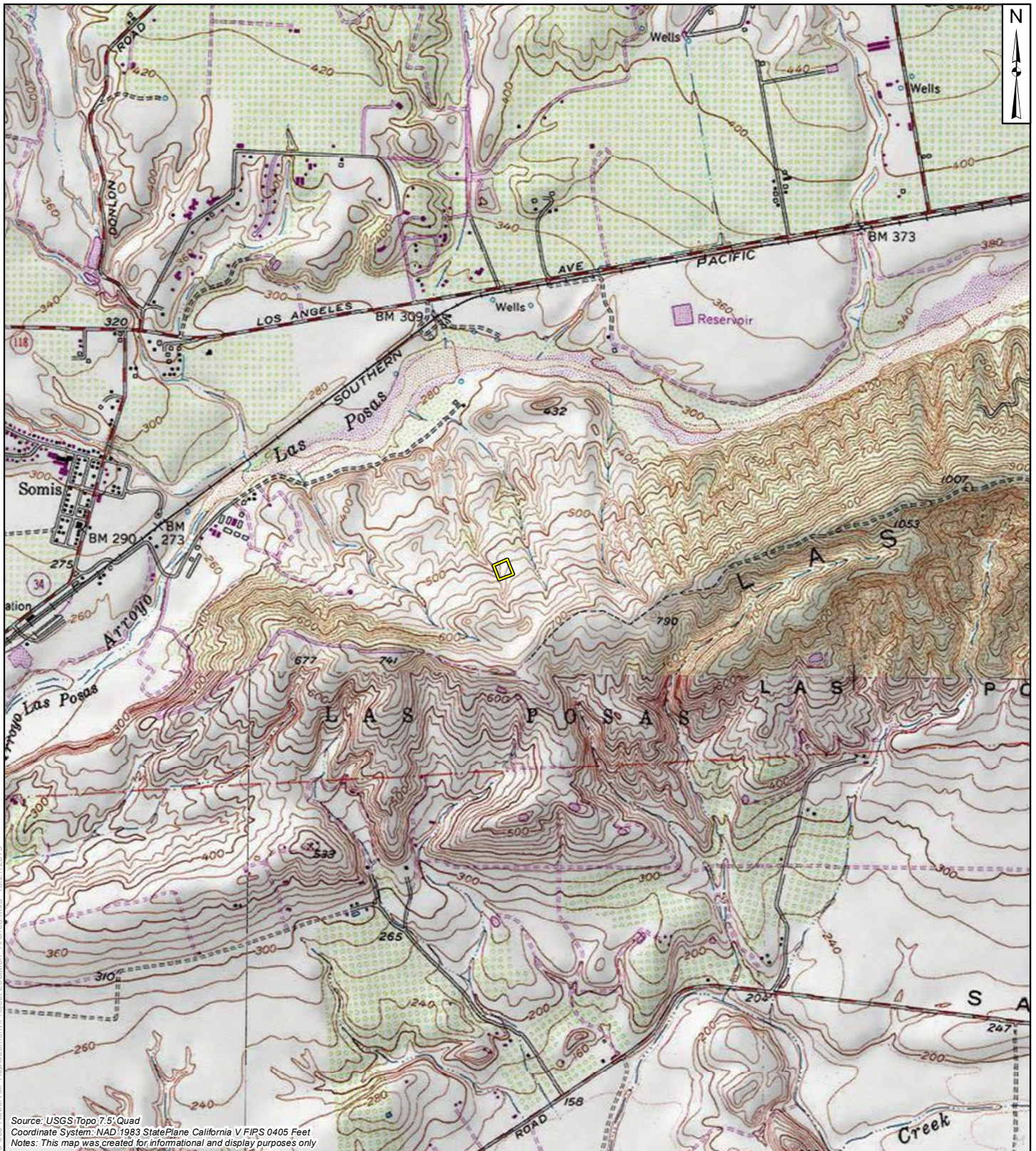
It is estimated that a crew of up to 16 personnel would be required for project construction with a maximum of 12 construction employees being required at any one time.

2.3.4 Construction Staging Areas

Staging of equipment and materials would occur within the existing easement. However, materials offloading may also occur along the existing access road and adjacent areas.

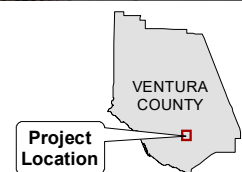
2.4 OPERATIONS AND MAINTENANCE

Long-term operations and maintenance requirements for the project would be minimal as the operation of the new tanks would be automated. The exterior of the reservoir and the site in general would be inspected on a weekly basis by District staff. Any necessary maintenance (e.g., weed abatement, coating of the tanks, emergency generator service and testing, pump maintenance) would be conducted when needed. The interior would be inspected once every five years by a consulting specialist. No new permanent employees would be required as a result of the project.



LEGEND:

Project Location



USGS 7.5' Quadrangle: Moorpark
Legal Description: T2N, R20W Sec.16

padre
associates, inc.
ENGINEERS, GEOLOGISTS &
ENVIRONMENTAL SCIENTISTS

PROJECT NAME: PRESSURE ZONE
538 RESERVOIR REPLACEMENT
VENTURA COUNTY, CA
PROJECT NUMBER: 1902-3831
DATE: October 2019

PROJECT LOCATION

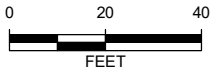
FIGURE
1



LEGEND:

- Existing Easement
- Tank Pad
- Phase 1 (Tank Pad and Tank 1)
- Phase 2 (Booster Pump Station)
- Phase 3 (Tank 2 and Emergency Generator)
- Existing Feature

MAP EXTENT:



Source: Esri Online Imagery Basemap, Jensen Design & Surveying, Inc. 2022
Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
Notes: This map was created for informational and display purposes only.

padre
associates, inc.
ENGINEERS, GEOLOGISTS &
ENVIRONMENTAL SCIENTISTS

PROJECT NAME: PRESSURE ZONE 538
RESERVOIR REPLACEMENT PROJECT
VENTURA COUNTY, CA
PROJECT NUMBER: 2202-0851
DATE: April 2022

SITE PLAN

FIGURE
2



a. View of the existing reservoir from the access road, facing south



b. View of the existing reservoir and easement, facing northwest



c. View of the proposed location of Tank 1, facing northeast



d. View of the existing reservoir, facing northwest

3.0 LAND USE SETTING

The project site comprises the existing tank site easement, which encompasses 0.38 acres on Assessor's Parcel Number 163-0-010-27. This 48.11 acre parcel is zoned AE-40 ac (Agricultural Exclusive, 40 acre minimum parcel size) with a Ventura County General Plan designation of Agriculture. The purpose of the Agricultural Exclusive zone is to preserve and protect commercial agricultural lands as a limited and irreplaceable resource, to preserve and maintain agriculture as a major industry in Ventura County and to protect these areas from the encroachment of nonrelated uses which, by their nature, would have detrimental effects upon the agriculture industry.

4.0 ENVIRONMENTAL IMPACT ANALYSIS

This section evaluates the potential environmental impacts of the proposed project. The analysis of potential impacts is consistent with methodology and impact threshold criteria presented in the Ventura County Initial Study Assessment Guidelines (Ventura County 2011). Impact analysis is organized by environmental topic (e.g., air quality, water resources, etc.). The determinations of significance for project-level and cumulative impacts are summarized in the Initial Study Checklist, which is attached to this document. Cumulative impacts were assessed to determine if the project's incremental contribution would be considerable, such that an environmental impact report would be required. Cumulative impacts were considered significant if project-specific impacts would be significant. Growth inducement is discussed in a separate section following cumulative impacts. In addition, a summary of project consistency with the policies of the Ventura County 2040 General Plan is provided as Table 7.

ISSUE 1: AIR QUALITY

Setting. Ventura County is located in the South-Central Coast Air Basin. The topography and climate of Southern California combine to make the basin an area of high air pollution potential. Ozone and particulate matter less than 10 microns (PM₁₀) are of particular interest in Ventura County because State air quality standards for these pollutants are periodically exceeded. The air quality of Ventura County is monitored by a network of five stations, operated by the California Air Resources Board (CARB) and the Ventura County Air Pollution Control District (APCD). The Thousand Oaks monitoring station is the nearest station to the project site, located approximately 6.7 miles to the southeast.

Table 3 lists the monitored maximum concentrations and number of exceedances of air quality standards for the years 2018 through 2020. As shown in Table 3, ozone concentrations monitored at the Thousand Oaks station exceeded the State 1-hour standard on only one day and rarely exceeded the State 8-hour ozone standard from 2018 through 2020. PM₁₀ concentrations exceeded the State 24-hour standard at the El Rio station (not monitored at the Thousand Oaks station) on 56 sampling days from 2018 through 2020. PM_{2.5} concentrations exceeded the Federal 24-hour standard at the Thousand Oaks station during two sampling events from 2018 through 2020.

Significance Thresholds. The APCD has prepared Air Quality Assessment Guidelines (2003) for the preparation of air quality impact analyses. The Guidelines indicate that projects within the County would have a significant impact on the environment if they would:

- Result in daily emissions exceeding 25 pounds of reactive organic compounds (ROC) or oxides of nitrogen (NO_x).
- Cause a violation or make a substantial contribution to a violation of an ambient air quality standard.
- Directly or indirectly cause the existing population to exceed the population forecasts in the most recently adopted Ventura County Air Quality Management Plan (AQMP).
- Be inconsistent with the AQMP and emit greater than 2 pounds per day ROC or NO_x.

Due to the temporary, short-term nature of construction emissions, the APCD does not apply the quantitative emissions thresholds for ROC and NO_x to construction activities. The APCD does require that emission reduction measures be implemented during construction to reduce exhaust emissions and fugitive dust generation.

Table 3. Air Quality Summary

Parameter	Standard	Year		
		2018	2019	2020
Ozone (O ₃) – parts per million (Thousand Oaks station)				
Maximum 1-hour concentration monitored (ppm)	0.095 ppm	0.080	0.082	0.097
Number of days exceeding State standard		0	0	1
Maximum 8-hour concentration monitored (ppm)	0.070 ppm	0.073	0.074	0.084
Number of days exceeding State & Federal 8-hour standard		1	2	7
Particulate Matter less than 10 microns (PM ₁₀) – micrograms per cubic meter (El Rio station)				
Maximum sample (µg/m ³)	50 µg/m ³	208.4	192.4	206.0
Number of samples exceeding State standard		21	14	21
Number of samples exceeding Federal standard	150 µg/m ³	2	2	2
Particulate Matter less than 2.5 microns (PM _{2.5}) – micrograms per cubic meter (Thousand Oaks station)				
Maximum sample (µg/m ³)	35 µg/m ³	41.5	24.5	36.3
Number of samples exceeding Federal 24-hour standard		1	0	1

Part 1.a Regional

Impacts (LS). Construction. The project would generate air pollutant emissions as a result of tank pad construction, tank construction and booster pump station installation, primarily exhaust emissions from heavy-duty trucks, worker vehicles and heavy equipment. Heavy equipment emissions were estimated for a peak day using the OFFROAD 2021 model developed by the CARB, focusing on tank pad construction. Emissions of on-road vehicles were estimated using the CARB's EMFAC 2021 model, assuming 40 one-way trips (10 auto, 22 light-duty truck, 8 heavy-duty truck) would occur on a peak work day. Estimated project peak day emissions are listed in Table 4. Although peak day NO_x emissions would exceed the 25 pounds per day threshold established by the APCD, due to the temporary, short-term nature of demolition and construction emissions, the APCD does not apply the quantitative emissions thresholds for ROC and NO_x to construction activities. The APCD does require that emission reduction measures be implemented during construction-type activities to reduce exhaust emissions and fugitive dust generation.

Table 4. Project Peak Day Construction Air Pollutant Emissions

Source	Pollutant, Pounds per Peak Day			
	ROC	NO _x	CO	PM ₁₀
Equipment exhaust	2.6	26.1	21.4	1.3
On-road vehicles	0.1	1.7	2.6	0.2
Fugitive dust*	0.0	0.0	0.0	72.2
Total	2.7	27.8	24	73.7

*With standard dust control mitigation

Projects that cause local populations to exceed population forecasts in the Air Quality Management Plan (AQMP) are considered inconsistent with the AQMP, as exceeding population forecasts can result in the generation of emissions beyond those which have been projected in the AQMP. The proposed project would not provide any housing or long-term employment opportunities; therefore, it would not result in any population growth. As such, the project would be consistent with the AQMP.

The combustion of diesel fuel in truck engines (as well as other internal combustion engines) produces exhaust containing a number of compounds that have been identified as hazardous air pollutants by U.S. Environmental Protection Agency (EPA) and toxic air contaminants by the CARB. Particulate matter (PM) from diesel exhaust has been identified as a toxic air contaminant, which has prompted CARB to develop a Final Risk Reduction Plan (released October 2000) for exposure to diesel PM. Based on CARB Resolution 00-30, full implementation of emission reduction measures recommended in the Final Risk Reduction Plan would result in a 75 percent reduction in the diesel PM Statewide inventory and the associated cancer risk by 2010, and an 85 percent reduction by 2020 in the diesel PM inventory and potential cancer risk.

The project area is agricultural and supports few residences in proximity to the project site. However, tank replacement would involve diesel exhaust emissions from heavy equipment and heavy-duty trucks as close as 1,100 feet from a residence. This residence is currently exposed to regional diesel exhaust emissions from motor vehicle traffic on State Route 34 and State Route 118, and rail traffic on the Union Pacific Railroad/Metrolink tracks. The proposed project would have a small, short-term contribution to existing diesel PM emissions associated with demolition and tank construction activities, and impacts are considered less than significant.

APCD Emissions Reduction Measures. Air emissions reduction measures recommended by the APCD Air Quality Assessment Guidelines (revised 2003) will be incorporated into the project including:

- The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive 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 water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.
- All trucks shall be required to cover their loads as required by California Vehicle Code §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 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 shall be seeded and watered until plant 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 the APCD in determining 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, shall be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.
- Material stockpiles shall be enclosed, covered, stabilized, or otherwise treated as needed to prevent blowing fugitive dust off site.
- All project construction and site preparation operations shall be conducted in compliance with all applicable APCD Rules and Regulations with emphasis on Rule 50 (Opacity), Rule 51 (Nuisance), Rule 55 (Fugitive Dust) and Rule 10 (Permits Required).
- Signs displaying the APCD complaint line telephone number (805/303-3700 during business hours; 805/303-3708 after hours) shall be posted in a prominent location visible to the public.
- Adjacent paved 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 these streets and roads by project-related equipment or truck traffic.
- 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.
- Off-road construction equipment shall utilize engines certified to the Federal Emissions Standard Category of Tier 3 or Tier 4, if available. Based on Federal exhaust emission standards, using Tier 3 certified engines instead of Tier 2 certified engines would reduce NO_x and non-methane hydrocarbon emissions by 39 percent.

Operation. Phase 2 of the proposed project includes installation of a diesel engine-driven emergency generator, which would be test-run periodically. Exhaust emissions associated with emergency generator testing were estimated based on a 350 kilowatt/hour generator, two hours operation on a peak day and manufacturer's emissions factors. Peak day air pollutant emissions would be 9.7 pounds NO_x and 0.2 pounds ROC. Peak day emissions would be less than the 25 pounds per day significance thresholds and are considered a less than significant impact to air quality.

Part 1.b Local

Impacts (LS). State 1-hour ambient standards for carbon monoxide (CO) are sometimes exceeded at urban roadway intersections during times of peak traffic congestion. These localized areas are sometimes called CO hotspots. Project-related traffic would utilize Upland Road and would contribute to CO emissions at local intersections. However, ambient CO levels in the region are low due to increasingly stringent vehicle emissions standards, use of oxygenated fuels, and relatively low population density.

The number of daily vehicle trips that would be generated by the project (up to 40 one-way trips per day) would not substantially add to traffic volumes on Upland Road or adjacent roadways. Considering the above, the project would not be expected to create or contribute substantially to the violation of CO standards.

Fugitive dust would be generated by the operation of heavy equipment and vehicles during tank demolition and removal and construction of the new tanks. Dust generation from these activities would be considered a significant impact if APCD Rule 51 is violated. 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 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.” Fugitive dust generated by the project may be considered a nuisance by land uses near the site or unpaved access roads. Therefore, fugitive dust reduction measures listed in Part 1.a above have been incorporated into the project.

ISSUE 2: WATER RESOURCES

Part 2.a Groundwater Quantity

Setting. The project site is located in the Las Posas Valley Groundwater Basin (LPVB), which is an alluvial groundwater basin located north of Camarillo, California. The Las Posas Valley ranges in elevation from approximately 100 feet above mean sea level in the southwest to more than 1,500 feet above mean sea level in the northeast. The primary surface water drainage in the Las Posas Valley is Arroyo Las Posas, which is named Arroyo Simi in the easternmost portion of the Las Posas Valley. Land use overlying the LPVB is divided between agricultural, urban uses, and open space.

Although the California Department of Water Resources has defined the LPVB as a single groundwater basin, the western and eastern parts of the basin are hydraulically separated from each other by the Somis Fault, a geologic feature that inhibits groundwater flow across it. As a result, groundwater conditions on the west side of the fault in the Fox Canyon Aquifer and Grimes Canyon Aquifer, two primary aquifers in the LPVB, differ from conditions on the east side of the fault.

Furthermore, the Epworth Gravels Aquifer, located on the east side of the fault is hydrologically separated from the Fox Canyon Aquifer and Grimes Canyon Aquifer. Hydrologic differences in the controls on, and responses to, both recharge and groundwater production necessitate the definition of three separate management areas in the LPVB. These three management areas are the West Las Posas Management Area, the East Las Posas Management Area, and the Epworth Gravels Management Area.

Historical groundwater production in the LPVB has resulted in chronic declines in groundwater levels and loss of groundwater in storage in parts of each of the three management areas. In the West Las Posas Management Area, the average rate of groundwater production between 2015 and 2017 was approximately 14,000 acre-feet per year. In the East Las Posas Management Area and the Epworth Gravels Management Area, the average rate of groundwater production between 2015 and 2017 was approximately 20,500 acre-feet per year and 1,500 acre-feet per year, respectively. Numerical groundwater simulations indicate that if these production rates were carried into the future, groundwater elevations in each of the management areas of the LPVB would not recover during multi-year cycles of drought and recovery.

The California Department of Water Resources has designated the LPVB as a high-priority groundwater basin under the Sustainable Groundwater Management Act. The majority of the LPVB is within the jurisdiction of the Fox Canyon Groundwater Management Agency (FCGMA) to manage and protect the aquifers within its jurisdiction for the common benefit of the public and all groundwater users. The FCGMA is one of three groundwater sustainability agencies (GSAs) that have jurisdiction over portions of the LPVB. The Camrosa Las Posas Valley GSA manages the Camrosa Water District Service area in the Las Posas Valley, and the Las Posas Outlying Areas GSA manages portions of the LPVB not within FCGMA or Camrosa jurisdiction.

The FCGMA prepared a Draft Groundwater Sustainability Plan in July 2019 which covers the entire LPVB, including all areas of the LPVB outside of FCGMA's jurisdiction. The LPVB Groundwater Sustainability Plan was approved by the California Department of Water Resources on January 13, 2022.

Significance Thresholds. The following significance thresholds are from the Ventura County Initial Study Assessment Guidelines (ISAG):

1. Any land use or project that will directly or indirectly decrease, either individually or cumulatively, the net quantity of groundwater in a groundwater basin that is overdrafted or creates an overdrafted groundwater basin shall be considered to have a significant groundwater quantity impact.
2. In groundwater basins that are not overdrafted, or are not in hydrologic continuity with an overdrafted basin, net groundwater extraction that will individually or cumulatively cause overdrafted basin(s), shall be considered to have a significant groundwater quantity impact.
3. 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, any proposed net increase in groundwater extraction from that groundwater basin and/or hydrologic unit shall be considered to cause a significant groundwater quantity impact until such time as reliable studies determine otherwise.

4. Regardless of items 1-3 above, any land use or project which would result in 1.0 acre-feet, or less, of net annual increase in groundwater extraction is not considered to have a significant project or cumulative impact on groundwater quantity.
5. Any project that is inconsistent with any of the policies or development standards relating to groundwater quantity of the Ventura County General Plan Goals, Policies and Programs or applicable Area Plan, may result in a significant environmental impact.

Impacts (LS). Construction. The project would require a small amount of water for dust control, soil compaction and concrete curing purposes during tank demolition, tank pad construction and construction of the two new tanks. Construction water needs would be met by Ventura County Waterworks District no. 19 (including some local groundwater) from the pipeline serving the existing tank or nearby fire hydrants. Due to the small volume required for project-related earthwork (maximum of a few thousand gallons per day for about 30 workdays), and temporary water demand, additional groundwater extraction would not be required to meet project construction demands. In any case, any project-related groundwater extraction would not result in overdraft of the LPVB or impede sustainable groundwater management of the LPVB.

Operation. The purpose of Tank 1 is to provide storage to serve the domestic and firewater needs of the Somis Ranch Farmworker Housing Project. Domestic water needs of this project have been estimated as 74.85 acre-feet per year (Rincon, 2020). The District has sufficient groundwater resources to supply this demand and provided a Water Availability Letter for this project on May 8, 2019. Although the proposed project would not create a demand for groundwater, it would facilitate water use by the Somis Ranch Farmworker Housing Project. Tank 2 would only provide additional water storage for existing District customers and would not result in or facilitate any increased water demand. Overall, groundwater use associated with the proposed project would not result in overdraft of the LPVB or impede sustainable groundwater management of the LPVB.

Part 2.b Groundwater Quality

Setting. Groundwater extracted from the LPVB periodically exceed water quality objectives for total dissolved solids, chloride, nitrate, boron and sulfate (FCGMA, 2019).

Significance Thresholds. The following significance thresholds are from the Ventura County ISAG:

1. Any land use or project proposal that will individually or cumulatively degrade the quality of groundwater and cause groundwater to exceed groundwater quality objectives set by the Basin Plan shall be considered to have a significant impact.
2. A land use or project shall be considered to have a significant impact on groundwater quality where there is evidence that the proposed land use or project could cause the quality of groundwater to fail to meet the groundwater quality objectives set by the Basin Plan.

3. Any land use or project that proposes the use of groundwater in any capacity and is located within two miles of the boundary of a former or current test site for rocket engines shall be considered to have a significant impact.
4. Any project that is inconsistent with any of the policies or development standards relating to groundwater quality of the Ventura County General Plan Goals, Policies and Programs or applicable Area Plan, may result in a significant environmental impact.

Impacts (NI). The project would not discharge any wastewater or other materials that may infiltrate to a groundwater basin and adversely affect groundwater quality. Fueling and maintenance of heavy equipment associated with the proposed project would be conducted in areas away from Arroyo Las Posas to prevent any inadvertent spillage from affecting any underlying groundwater. In addition, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared, which would include best management practices to be implemented which would also prevent discharges to surface waters.

Part 2.c Surface Water Quantity

Setting. The project site is located approximately 2,600 feet south of Arroyo Las Posas, which becomes Calleguas Creek as it crosses under Upland Road. Arroyo Las Posas near the project site is nearly perennial due to rising groundwater and discharge from dewatering wells upstream (Simi Valley) and periodic discharge of treated wastewater from the Moorpark Wastewater Treatment Plant (located approximately two miles upstream of the project site). A stream flow gauge (No. 841A) measures surface flow rates in Arroyo Las Posas upstream of Hitch Boulevard. The largest flow event recorded at this gauge was 9,520 cubic feet per second on March 12, 1995.

Significance Thresholds. The following significance thresholds are from the Ventura County ISAG:

1. Any project that will increase surface water consumptive use (demand), either individually or cumulatively, in a fully appropriated stream reach as designated by the State Water Resources Control Board or where unappropriated surface water is unavailable, shall be considered to have a significant adverse impact on surface water quantity.
2. Any project that will increase surface water consumptive use (demand) including but not limited to diversion or dewatering downstream reaches, either individually or cumulatively, resulting in an adverse impact to one or more of the beneficial uses listed in the Basin Plan is considered a significant adverse impact.
3. Any project that is inconsistent with any of the policies or development standards relating to surface water quantity of the Ventura County General Plan Goals, Policies and Programs or applicable Area Plan may result in a significant environmental impact.

Impacts (NI). The project would require a small amount of water for dust control and soil compaction purposes during tank demolition and removal and construction of the new tanks. Water would be supplied by the Ventura County Waterworks District no. 19 which includes local groundwater and imported water provided by the Calleguas Municipal Water District. Imported water (in part) originates as surface flows in the Sacramento River delta. The environmental impacts associated with obtaining this water have been fully addressed in CEQA documents prepared for the State Water Project. The proposed project would not result in any consumptive use of local surface water. The proposed project would be consistent with the Ventura County General Plan with regard to surface water uses.

Part 2.d Surface Water Quality

Setting. The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) has jurisdiction over waters between Rincon Point (at the western boundary of Ventura County) and the eastern Los Angeles County line. The Regional Board has developed a Water Quality Control Plan, or “Basin Plan”, to protect the quality of surface and groundwaters of the region. The Basin Plan designates beneficial uses of waters within the region, sets narrative and numerical water quality objectives to protect beneficial uses, and describes implementation programs intended to meet the Basin Plan objectives.

Beneficial uses established for surface water in Arroyo Las Posas are municipal supply (potential), industrial supply (potential), process supply (potential), agricultural supply (potential), groundwater recharge, warm freshwater habitat, cold freshwater habitat (potential), water contact recreation, non-water contact recreation and wildlife habitat (LARWQCB 1994, revised 2013).

Surface water of Arroyo Las Posas is considered impaired under Section 303(d) of the Clean Water Act, due to elevated levels of indicator bacteria, ammonia, nitrate, nitrite, chlordane, toxicity, chlorpyrifos, chloride, sedimentation/siltation, diazinon, DDT (sediment), dieldrin, sulfates and total dissolved solids (SWRCB 2021). A water body is impaired when data indicate that adopted water quality objectives are continually exceeded or that beneficial uses are not protected.

Significance Thresholds. The following significance thresholds are from the Ventura County ISAG:

1. Any land use or project proposal that is expected to individually or cumulatively degrade the quality of surface water causing it to exceed water quality objectives of the Basin Plan may have a significant impact.
2. Any land use or project development that directly or indirectly causes stormwater quality to exceed water quality objectives or standards in the County's Municipal Stormwater MS4 Permit or any other NPDES Permits may have a significant impact.

Impacts (LS). Although the project site is approximately 2,600 feet from Arroyo Las Posas, storm water run-off from the project site during the demolition and construction period may degrade surface water quality. The project would disturb less than one acre of land such that it would not require coverage under the National Pollutant Discharge Elimination System General Permit for Discharges of Storm Water Associated with Construction and Land Disturbance Activities (Water Quality Order 2009-0009-DWQ). However, the proposed project would be subject to the County's stormwater quality management program developed for the Ventura County Municipal Separate Storm Sewer System Permit (Order R4-2010-0108, NPDES Permit No. CAS004002) and standard conditions imposed by the Ventura County Public Works Agency, including implementation of stormwater best management practices which would prevent significant impacts to surface water quality.

ISSUE 3: MINERAL RESOURCES

Part 3.a Aggregate Resources

Setting. Aggregate resources are defined as construction grade sand and gravel. The project site is located in an area designated as MRZ-3 by the State of California Division of Mines and Geology (CDMG 1993). This designation indicates the significance of aggregate deposits cannot be evaluated based on available data. The nearest aggregate mining operation in the project area is the Grimes Rock quarry, located approximately 6.6 miles northeast of the project site.

Significance Thresholds. The following significance thresholds are from the Ventura County ISAG:

1. Any land use or project activity which is proposed to be located on or immediately adjacent to land zoned Mineral Resource Protection overlay zone, or adjacent to a principal access road to an existing aggregate Conditional Use Permit, and which has the potential to hamper or preclude extraction of or access to the aggregate resources, shall be considered to have a significant adverse impact on the environment.
2. A project would have a cumulative impact on aggregate resources if when considered with other pending and recently approved projects in the area, hampers or precludes extraction or access to identified resources.

Impacts (LS). The project site is not located within a Mineral Resource Protection overlay zone or an area that may contain significant aggregate deposits. The proposed project may require a small amount of aggregate resources for the new tank foundations and asphalt paving but would not generate any regional or long-term demand for aggregate resources or hamper future extraction of aggregate from the area. Therefore, the project would have a less than significant impact on aggregate resources.

Part 3.b Petroleum Resources

Setting. Petroleum resources are defined as oil and gas deposits. Known petroleum fields are mapped by the State of California Division Oil, Gas, and Geothermal Resources (DOGGR). According to DOGGR's on-line mapping system, the nearest well to the project site is an oil and gas well (Berylwood 2) operated by The Texas Company, located approximately 800 feet to the southwest (Somis Field). This well was plugged and abandoned in 1956. The nearest active oil or gas well is located approximately 4.2 miles to the northeast. There are no oil or gas processing facilities in the immediate project area.

Significance Thresholds. The following significance thresholds are from the Ventura County ISAG:

1. Any land use that is proposed to be located on or immediately adjacent to any known petroleum resource area, or adjacent to a principal access road to an existing petroleum CUP, has the potential to hamper or preclude access to petroleum resources.
2. If the subject property is not located on or adjacent to land located in an oil field or containing an oil extraction CUP, then the project would not cause a significant impact on the extraction of oil resources. If the subject property is located on or adjacent to land located in an oil field or containing an oil extraction CUP, then the state Division of Oil and Gas Regulation should be consulted for their review of the project application.
3. If the subject property is not located adjacent to a road used as a principal means of access to an existing CUP for oil extraction, and the proposed use is not sensitive to the effects of truck traffic to and from the oil CUP, then the project would not cause a significant impact on access to oil resources.

Impacts (NI). As indicated above, the project site is not located within or adjacent to a petroleum resource area or petroleum production facility. Project-related activities would only use a minor amount of petroleum products for heavy equipment and vehicle fuels and asphalt pavement and would not affect the supply of petroleum in the County. In addition, the proposed project would not create a barrier to the extraction of petroleum resources, if discovered near the project site. Therefore, the proposed project would not impact petroleum resources.

ISSUE 4: BIOLOGICAL RESOURCES

Part 4.a Species

Setting. The project site is entirely developed or disturbed (see Figure 3); however, the southwestern portion of the site (less than 2,000 square feet) supports weedy vegetation dominated by flax-leaved horse-weed (*Erigeron bonariensis*) and horse-weed (*Erigeron canadensis*). Areas surrounding the project site support orchard crops (avocado, lemon). The nearest native vegetation in the project area is willow riparian scrub in Arroyo Las Posas, approximately 0.5 miles to the north.

Wildlife observed in proximity to the project site during site visits on October 22, 2019 and April 5, 2022 included side-blotched lizard (*Uta stansburiana*), house finch (*Haemorrhous mexicanus*), spotted towhee (*Pipilo maculatus*), lesser goldfinch (*Spinus psaltria*), American crow (*Corvus brachyrhynchos*), Anna's hummingbird (*Calypte anna*), northern flicker (*Colaptes auratus*) and California ground squirrel (*Otospermophilus beecheyi*).

Table 5. Special-Status Species Reported within Five miles of the Project Site

Common Name (Scientific Name)	Status	Nearest Reported Location to the Project Site
Ojai navarretia (<i>Navarretia ojaiensis</i>)	List 1B	Near Wendy Drive, 4.2 miles to the southeast (CNDDDB, 2022)
Gerry's curly-leaved monardella (<i>Monardella sinuata ssp. gerryi</i>)	List 1B	Las Posas Hills, 2.2 miles to the east (CNDDDB, 2022)
Blochman's dudleya (<i>Dudleya blochmaniae ssp. blochmaniae</i>)	List 1B	Conejo Grade, 3.9 miles to the south (CNDDDB, 2022)
Chaparral ragwort (<i>Senecio aphanactis</i>)	List 2B	Conejo Mountain, 4.0 miles to the south (CNDDDB, 2022)
Verity's dudleya (<i>Dudleya verityi</i>)	FT, List 1B	Conejo Mountain, 4.0 miles to the south (CNDDDB, 2022)
Conejo buckwheat (<i>Eriogonum crocatum</i>)	SR, List 1B	Near Conejo Creek, 2.1 miles to the southeast (CNDDDB, 2022)
Conejo dudleya (<i>Dudleya parva</i>)	FT, List 1B	Near Camarillo Springs Road, 4.0 miles to the south (CNDDDB, 2022)
Lyon's pentachaeta (<i>Pentachaeta lyonii</i>)	FE, SE, List 1B	Hill Canyon, 3.6 miles to the southeast (CNDDDB, 2022)
California legless lizard (<i>Anniella sp.</i>)	CSC	Old Ranch Road, 1.8 miles to the south (CNDDDB, 2022)
Arroyo chub (<i>Gila orcuttii</i>)	CSC	Conejo Creek, 1.3 miles to the southeast (M. Ingamells, personal observation)
Western pond turtle (<i>Emys marmorata</i>)	CSC	Conejo Creek, 1.3 miles to the southeast (M. Ingamells, personal observation)
Coast horned lizard (<i>Phrynosoma blainvillii</i>)	CSC	Las Posas Hills, 2.4 miles to the east (CNDDDB, 2022)
Coastal western whiptail (<i>Aspidoscelis tigris stejnegeri</i>)	CSC	Tentative Tract Map 4410, 3.0 miles to the east (Padre Associates, 2014)
San Bernardino ring-neck snake (<i>Diadophis punctatus modestus</i>)	SA	Las Posas Hills, 3.2 miles to the east (CNDDDB, 2022)
Two-striped garter snake (<i>Thamnophis hammondi</i>)	CSC	Arroyo Las Posas, 0.5 miles to the north (Z. Abbey, personal observation)

Common Name (<i>Scientific Name</i>)	Status	Nearest Reported Location to the Project Site
Least Bell's vireo (<i>Vireo bellii pusillus</i>)	FE, SE	Arroyo Las Posas, 0.5 miles to the north (Z. Abbey, personal observation)
California gnatcatcher (<i>Poliophtila californica</i>)	FT, CSC	Rancho Conejo Open Space, 4.0 miles to the southeast (CNDDDB, 2022)
Yellow warbler (<i>Setophaga petechia</i>)	CSC (nesting)	Arroyo Las Posas, 0.5 miles to the north (Z. Abbey, personal observation)
Yellow-breasted chat (<i>Icteria virens</i>)	CSC (nesting)	Arroyo Las Posas, 0.5 miles to the north (Z. Abbey, personal observation)
San Diego desert woodrat (<i>Neotoma lepida intermedia</i>)	CSC	Western Moorpark, 4.0 miles to the northeast (CNDDDB, 2022)
American badger (<i>Taxidea taxus</i>)	CSC	Along Calleguas Creek, 4.2 miles to the southwest (CNDDDB, 2022)

Status Notes:

CSC	California Species of Special Concern (CDFW)
FE	Federal Endangered (USFWS)
FT	Federal Threatened (USFWS)
List 1B	Plants rare, threatened, or endangered in California and elsewhere (CNPS)
List 2B	Plants rare, threatened, or endangered in California but more common elsewhere (CNPS)
SA	Special animal (CDFW)
SE	California Endangered (CDFW)
SR	California Rare (CDFW)

Due to the lack of suitable habitat, special-status plant or wildlife species are not anticipated to occur on or near the project site.

Significance Thresholds. The following significance thresholds are from the Ventura County ISAG. A project will have a direct or indirect physical impact to a plant or animal species if a project, directly or indirectly:

- Reduces a species' population,
- Reduces a species' habitat,
- Increases habitat fragmentation, or
- Restricts reproductive capacity.

The determination of whether a project's impact is significant or not shall be based on both the current conservation status of the species affected and the severity or intensity of impact caused by the project. Endangered, rare and threatened species, as well as special-status species, are more susceptible to project impacts than a more common species. If a project's impact is severe or intense, it may cause a population of a more common species to decline substantially or drop below self-sustaining levels, which would be considered a significant impact.

Impacts (NI). Proposed tank demolition and removal and construction of new tanks would not adversely affect any special-status species. In addition, take of migratory birds protected under the Federal Migratory Bird Treaty Act of 1918 and Section 3513 of the California Fish and Game Code would not occur because vegetation removal (potential nesting habitat) is not required.

Part 4.b Ecological Communities

Setting. Native plant communities are lacking at the project site. Vegetation at the project site is limited to a small patch of weedy species within a periodically disturbed environment. Sensitive ecological communities do not occur at or near the project site.

Significance Thresholds. The following types of impacts to sensitive plant communities (critically imperiled, imperiled or vulnerable to extinction or extirpation) are considered potentially significant:

1. Construction, grading, clearing, or other activities that would temporarily or permanently remove sensitive plant communities. Temporary impacts to sensitive plant communities would be considered significant unless the sensitive plant community is restored once the temporary impact is complete.
2. Indirect impacts resulting from project operation at levels that would degrade the health of a sensitive plant community.

Impacts (NI). Proposed tank demolition and removal and new tank construction activities would occur within disturbed areas lacking native vegetation, and would avoid any sensitive communities.

Part 4.c Waters and Wetlands

Setting. The U.S. Army Corps of Engineers (Corps) has jurisdiction over waters of the United States (U.S.) under the authority of Section 404 of the Clean Water Act. The limit of jurisdiction in non-tidal waters extends to the ordinary high water mark and includes all adjacent wetlands. Waters of the U.S. are defined as:

"All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; including all interstate waters including interstate wetlands, all other waters such as intrastate lakes, rivers, streams, mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce."

The Arroyo Las Posas channel north of the project site is considered waters of the U.S. under the Clean Water Act. Arroyo Las Posas is also considered "waters of the State" as defined in Section 13050 of the California Water Code.

Arroyo Las Posas near the project site meets the definition of "stream" in Title 14 Section 1.72 of the California Code of Regulations. Therefore, any disturbance of Arroyo Las Posas would require a streambed alteration agreement under Section 1602 of the California Fish and Game Code.

The Corps and EPA define wetlands as:

"Those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas."

The Ventura County 2040 General Plan Policy Document defines wetlands as:

"Lands that are transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is periodically covered with shallow water. The frequency of occurrence of water is sufficient to support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands include marshes, bogs, sloughs, vernal pools, wet meadows, river and stream overflows, mudflats, ponds, springs and seeps."

Federal-defined wetlands, State-defined wetlands, County-defined wetlands and wetland habitat may occur within Arroyo Las Posas which is located at least 2,600 feet from the project site.

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts to waters and wetlands include:

1. 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 and/or any disturbance of the substratum.
2. 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.
3. 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.

4. 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. Ventura County General Plan Policy 1.5.2-4 requires a minimum buffer of 100 feet from significant wetland habitat. In accordance with this policy, buffer areas may be increased or decreased upon evaluation and recommendation by a qualified biologist and approval by the decision-making body. Factors to be used in determining adjustment of the 100-foot buffer include soil type, slope stability, drainage patterns, presence or absence of endangered, threatened or rare plants or animals, and compatibility of the proposed development with the wildlife use of the wetland habitat area.

Impacts (NI). The proposed project would not result in any loss or disturbance of Federal-defined wetlands, State-defined wetlands, County-defined wetlands or wetland habitat.

Part 4.d Coastal Habitat

Setting. The project site is not located within the Coastal Zone.

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts to Environmentally Sensitive Habitat Areas (ESHA) include:

1. Construction, grading, clearing, or other activities and uses that would temporarily or permanently remove ESHA 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).
2. Indirect impacts resulting from project operation at levels that would degrade the health of an ESHA.

Impacts (NI). No project-related impacts to ESHA or other coastal resources would occur.

Part 4.e Habitat Connectivity

Setting. Wildlife migration corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Migration corridors may be local such as between foraging and nesting or denning areas, or they may be regional in nature. Migration corridors are not unidirectional access routes; however, reference is usually made to source and receiver areas in discussions of wildlife movement networks. "Habitat linkages" are migration corridors that contain contiguous strips of native vegetation between source and receiver areas. Habitat linkages provide cover and forage sufficient for temporary inhabitation by a variety of ground-dwelling animal species. Wildlife migration corridors are essential to the regional ecology of an area as they provide avenues of genetic exchange and allow animals to access alternative territories as fluctuating dispersal pressures dictate.

The South Coast Wildlands Missing Linkages Project (Penrod et al., 2006) has identified the Santa Monica-Sierra Madre Landscape Linkage which connects the Santa Monica Mountains to the south and the Sierra Madre Ranges of the Los Padres National Forest to the north. The project site is located near the western end of the Las Posas Hills. The east end of Las Posas Hills meets the southwestern strand of the Santa Monica-Sierra Madre Landscape Linkage near Tierra Rejada Valley, approximately 8.0 miles east of the site, where the Linkage then heads toward the southwest through the western Simi Hills to Palo Comado Canyon and Point Mugu State Park. The Las Posas Hills are not mapped as part of the Santa Monica-Sierra Madre Landscape Linkage, and at its nearest point, the Linkage is located approximately 8.0 miles east of the site, and is separated by substantial development (residential and agricultural land uses).

Arroyo Las Posas may function as a local wildlife movement corridor as it provides riparian habitat and cover. However, regional wildlife movements along Arroyo Las Posas are not expected due to channelization and rarity of riparian vegetation and/or cover upstream (Moorpark) and downstream (Camarillo) of the project site.

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts to habitat connectivity include:

1. A habitat connectivity feature (e.g., a linkage, corridor, chokepoint or steppingstone) would be severed, substantially interfered with, or potentially blocked.
2. Wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction would be prevented or substantially interfered with.
3. Wildlife would be forced to use routes that endanger their survival. For example, constraining a corridor for mule deer or mountain lion to an area that is not well-vegetated or that runs along a road instead of through a stream corridor or along a ridgeline.
4. Lighting, noise, domestic animals, or other indirect impacts that could hinder or discourage fish and/or wildlife movement within habitat connectivity feature (e.g., a linkage, corridor, chokepoint or steppingstone) would be introduced.
5. 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.
6. 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 steppingstones, would not be maintained.

Impacts (NI). The project site is not located within or adjacent to the Santa Monica-Sierra Madre Landscape Linkage or a County-designated critical wildlife passage area. The proposed project would not involve any barriers to wildlife movement, remove native vegetation or introduce any incompatible land uses that would involve lighting, noise or domestic animals. In addition, highway crossing structures or steppingstones would not be adversely affected.

ISSUE 5: AGRICULTURAL RESOURCES

Part 5.a Agricultural Soils

Setting. The project site is located in an area mapped as “Unique” farmland by the California Department of Conservation. The soils of the project site have been mapped as Huerhuero very fine sandy loam (9-15 percent slopes) (Edwards et al. 1970).

Significance Thresholds. The project would have a significant impact if it would either directly or indirectly result in the loss of important agricultural soils exceeding thresholds in the Ventura County ISAG, including 5 acres of farmlands classified as “Prime” or “Statewide Importance” in agricultural areas. The significance threshold for “Unique” farmlands is 10 acres in agricultural areas.

Impacts (LS). All proposed facilities and project-related soil disturbance would be limited to the existing tank site (easement). However, a small number of citrus trees (~10) have been planted by the property owner within the easement and would be removed during tank pad construction. Loss of Unique farmlands would be less than 0.1 acres and considered less than significant.

Part 5.b Land Use Incompatibility

Setting. The project site is surrounded by actively cultivated farmland supporting avocado and lemon orchards. This area has been classified as “Unique” farmland by the California Department of Conservation and zoned as agricultural land (AE 40 ac).

Significance Thresholds. A proposed non-agricultural land use would have a potentially significant impact if it would be located within 300 feet of classified farmland (without vegetative screening) unless it qualified for a waiver or deviation from the distance standard. Issues to be considered in determining the significance of land use incompatibility include demolition/construction-related dust suppression, storage of wood that may spread sudden oak death disease and depletion of a water source intended for agricultural irrigation.

Impacts (LS). The proposed project involves a direct replacement of an existing water tank serving surrounding agricultural land uses. The project would not interfere with the existing cultivation practices, zoning or designated land uses for this area or adjacent properties. The project qualifies for a waiver from the 300-foot criterion, because the people would not be continuously present (waiver h) and it is a continuing industrial use with no substantial changes in existing land use incompatibility (waiver k).

In addition, demolition and construction-related dust would be suppressed as discussed under Issue 1 (Air Quality). Storage of firewood would not occur on the site, and the project would not consume agricultural water supplies. Therefore, the project would not result in significant impacts to agricultural operations due to land use incompatibilities.

ISSUE 6: SCENIC RESOURCES

Setting. There are no County-designated Scenic Resource Areas or scenic resource protection areas in the project area. The Ventura County 2040 General Plan Background Report designates State Route 118 as an eligible County Scenic Highway. The existing water tank on the project site is visible from State Route 118 but is unlikely to be observed by passing motorists due to its green color (blends in with surrounding orchards) and distance (at least 4,100 feet away). Public views of the project site are limited to motorists on State Route 118.

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts to scenic resources include:

1. Is located within an area that has a scenic resource that is visible from a public viewing location; and would physically alter the scenic resource either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects.
2. Would substantially obstruct, degrade, or obscure a scenic vista, either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable future projects.
3. Inconsistent with any of the scenic resources policies of the Ventura County General Plan Goals, Policies and Programs or policies of the applicable Area Plan.

Impacts (LS). The project would not adversely affect any scenic resources or be inconsistent with General Plan Policies (see Section 5). The proposed new water tanks would each be 15 feet taller and 1.5 feet wider than the existing tank. Similar to the existing tank, the new tanks would be painted green to blend into the surrounding viewshed from State Route 118 (orchards). Due to the distance from State Route 118 (at least 4,100 feet), the project-related change in tank height would be virtually unnoticeable and not significantly degrade the visual quality of views from this eligible scenic highway.

ISSUE 7: PALEONTOLOGICAL RESOURCES

Setting. A record search was conducted of the on-line collections data base of the University of California Museum of Paleontology. *Globothalamea* (foraminiferan, marine invertebrate) fossils have been reported from a road cut along Santa Rosa Road. The project site is underlain by the Saugus Formation (Dibblee, 1992), which considered of high paleontological importance in the ISAG.

Significance Thresholds. The project would have a significant impact if it would result in the loss of or damage to important paleontological resources. Paleontological resources are important if they are well preserved, identifiable, type/topotypic specimens, age diagnostic, useful in environmental reconstruction, represent rare and or endemic taxa, represent a diverse assemblage, or represent associated marine or non-marine taxa.

Impacts (NI). Ground disturbance associated with the tank demolition and removal and construction of the new tanks would extend approximately five feet below the current ground surface, within areas previously disturbed by construction of the existing tank and/or historical agricultural clearing and cultivation. The Saugus Formation lies approximately 35 feet below the ground surface at the project site (Oakridge Geoscience, 2021), such that it would not be affected. As such, project activities would not result in impacts to known or suspected paleontological resources.

ISSUE 8: CULTURAL RESOURCES

Part 8.a Archaeological Resources

Setting. The project site lies within the historic territory of the Native American Indian group known as the Chumash. The Chumash occupied the region from San Luis Obispo County to Malibu Canyon on the coast, and inland as far as the western edge of the San Joaquin Valley, and the four northern Channel Islands (Grant 1978). Chumash society developed within its historic boundaries for over 7,500 years based on the continuity of mortuary practices, as well as the development of artifacts used in social activities.

Prior to colonization by the Spanish, the long period of development of Chumash society was possible since the Santa Barbara Channel area contained a higher concentration of resources than adjacent areas, and the society occupying this area was more powerful than the surrounding societies. The length of time during which the indigenous Santa Barbara Channel society developed was long compared to the majority of extant societies, which acquired their territories more recently. At the time of the first European contact, Chumash society was uniquely adapted to its environments, and well organized as a result of their evolution over long periods of time.

Evidence of Earliest Occupation. Knowledge of occupations during the Pleistocene in the study area is very limited. This is due to the small size of early groups, and since charcoal, bones, and shells are not as likely to be preserved in earlier sites. Some early coastal sites were probably inundated or eroded away by the rise in sea level, associated with the melting of ice at the end of the Pleistocene. Also, it is difficult to define the earliest occupations at most early sites due to poor preservation of stratigraphic features.

The earliest date of human occupation in Ventura County has not been determined, although it is believed that the area was settled prior to 11,000 years ago, since archaeological evidence does exist elsewhere throughout North America. The end of the Pleistocene was marked by climatic warming and resulting changes in environmental conditions, which led to extinction or geographical displacement of most large Pleistocene animals. The changes in plants and animals caused by a changing environment, coupled with the growth of human populations, resulted in changes in subsistence patterns.

Early Period. This period dates to approximately 6000-600 B.C., is the first period identified by archaeologists in California that contains the preserved remains of permanent settlements with associated cemeteries. Types of ornaments, charms, and other artifacts changed little throughout the period, although the numbers of artifact types increased, indicating a growth in social complexity. Several cemetery and residential contexts have been excavated in Chumash territory that are approximately 7000 years old. Artifacts and food remains recovered from these contexts indicate that people living along the coast were fishing with bone hooks, using boats or rafts to trade with the Channel Islands, and occasionally were taking sea mammals and large fish. The presence of deer bones, other animal bones, stone points, and knives indicates that hunting was also important.

Most early settlements consisted of small hamlets defensively situated on elevated landforms. During the Early Period, some settlements increased in size with the largest containing several hundred people. Large settlements were often less defensively situated than their smaller predecessors. Analysis of artifacts used to maintain social relationships and their distribution in mortuary contexts indicates that political power was largely dependent on the acquisition of wealth and ritual power (King 1990 and 2000).

Differences in the contents of burial lots found at large and small Early Period settlements on Santa Cruz Island indicate that the occupants of large ceremonial centers had more valuable ceremonial regalia than those of small settlements. The inhabitants of small villages probably lived at more than one settlement during the year, and the inhabitants of large settlements may have maintained only one residence. Although the Early Period settlement pattern apparently resulted in the formation of many sites which were not continuously inhabited, the degree to which the population was sedentary may differ little from the Protohistoric Period.

Middle Period. The end of the Early Period and the beginning of the Middle Period (ca. 600 B.C.) is marked by changes in ornaments and other artifacts, as well as changes in the organization of cemeteries, which indicate the development of hereditary control of political and economic power. The presence of separate cemetery areas containing a predominance of either ritual objects or wealth objects at early Middle Period sites indicates the presence of a system of checks and balances between chiefs and priest-judge executioners. At the beginning of the Middle Period, the more powerful ritual objects, such as stone pipes, libation vessels, stone effigies, and pointed charmstones, were owned by people who were not political leaders but who had inherited rights to perform rituals. Similar systems of checks and balances were necessary to maintain stability in social systems throughout California, and these systems evolved shortly after the development of hereditary leadership positions. Similar changes in social organization occurred at the time of the Early-Middle period transition throughout North America and were accompanied by migrations into areas that were marginal to major population centers.

Late Period. Differentiation of bead types indicates the development of new economic subsystems. After ca. A.D. 1000, there was a rapid growth of systems which culminated in the highly developed economic system observed by the Spanish explorers. After the 1542 Cabrillo voyage, many small Chumash settlements were abandoned and some of the largest historic towns were founded. This change in population distribution can be attributed to growth in importance of trade centers and the development of more integrated political confederations, which were necessary to encourage trade. Since environments of people living in inland valleys lacked marine resources, fish and other sea foods were obtained from people living on the coast and from islanders trading at mainland coastal villages. The pooling of resources, which resulted from the development of their economic system, served to reduce the negative effects of local crop failures (King 1976 and 1990).

Religious institutions regulate behavior by molding perceptions of society and the physical world. Changes in the types and distributions of objects used in ritual contexts indicate corresponding changes in religious systems. The rarity of ritual objects in Late Period burial lots reflects control over religion by institutions that owned the ritual objects. By the Late Period, more powerful objects were controlled by institutions. Changes in whistles, historically used in the organization of ceremonies, indicate a growth in the importance of organized ceremonies. Objects associated with supernatural power, such as charmstones, effigies, and sunstick stones, did not change greatly over time. It appears that most Chumash religious ceremonies had their roots in the Early Period when objects similar to those used historically were regularly placed in mortuary associations and owned by religious leaders.

Ethnography. At the time of historic contact, the project area (Ventura County) was occupied by the Ventureño branch of the Chumash, who were a Hokan speaking people. The Chumash achieved a cultural complexity unique for hunter and gatherer groups in California. They possessed a stratified society containing an upper, middle, and lower class. Moreover, attributes usually attributed to chiefdom societies, such as ownership of resources/property, craft specialists, large permanent population centers (villages), a sodality consisting of religious elitists (Antap), and a market economy, were all a part of Chumash culture at the time of historic contact (Blackburn 1974).

Politically, there were at least six ethnographically known Chumash provinces. The following are the provinces from north to south and their corresponding capitals, respectively: 1) Gaviota (capital at *Shisholop* or *Upop*); 2) Dos Pueblos (capital at *Mikiw*); 3) Santa Barbara (capital at *Synhten*); 4) Ventura (capital at *Shishopop*); 5) Mugu (capital at *Muwu* or *Simomo*); and 6) Malibu (capital at *Humaliwu*). In addition, there were apparently two religious federations, *Muwu* and *Upop* (Hudson and Underhay 1978).

All high status (Wots and shamans) or wealthy people were required to join a religious sodality known as the *Antap*. The *Antap* was the principal religious cult which dominated all aspects of Chumash religious and political society at the time of Spanish contact. Chumash religion could be accurately described as celestial, revolving around the worship of the sun, and various stars and planets comprising the Chumash pantheon (Blackburn 1975).

Traditionally, the Chumash were noted by the Spanish for their large domed houses, wood and stone craftsmanship, basketry, and foremost for the plank canoe (*tomo*). The implementation of the Spanish Mission system brought about a precipitous decline in the Chumash culture, with a disruption of the traditional social structure and a steady demise of the native population, caused in part by European diseases. This cultural decimation continued and perhaps was amplified during the post mission or Mexican period, until their near cultural extinction in the later Anglo (American) period. Chumash culture has been documented by John P. Harrington and C. Hart Merriam, and well summarized by Blackburn, Hudson, and others.

Records Search. A records search conducted by the South-Central Coast Information Center was received on December 11, 2019. The records search included a review of all recorded historic-era and prehistoric archaeological sites within a 0.25-mile radius of the project site as well as a review of known cultural resource surveys and technical reports. The State Historic Property Data Files, National Register of Historic Places, National Register of Determined Eligible Properties, California Points of Historic Interest, and the California Office of Historic Preservation Archaeological Determinations of Eligibility also were analyzed. The records search did not identify any previously recorded cultural resources within the project site or within a 0.25-mile radius of the project site.

Tribal Consultation. On March 30, 2022, the District formally notified Ms. Julie Tumamait-Stenslie of the Barbareno/Ventureno Band of Mission Indians and Mr. Rudy Ortega of the Fernandeno-Tataviam Band of Mission Indians via certified mail of the decision to undertake the proposed project to allow the tribes to request consultation under Section 21080.3.1(d) of the Public Resources Code. These two tribal representatives are the only traditionally and culturally affiliated contacts that have requested consultation notification from Ventura County. On April 25, 2022, Mr. Jairo Avila with the Fernandeno-Tataviam Band of Mission Indians sent an email to Ryan Lippincott requesting additional information, which was provided by email on May 2, 2022. Mr. Jairo Avila submitted comments by email on May 2, 2022, which consisted of mitigation measures to be implemented if cultural resources were discovered during project construction. These measures have been integrated into the mitigation measures listed on page 34.

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts to archaeological resources include:

1. Demolishes or materially alters 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) requirements of Section 5024.1(g) of the Public Resources Code, 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; or

2. Demolishes or materially alters 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.

Impacts (PS-M). The record search did not identify any archaeological resources within the project's area of potential effect. The record search and notification of affiliated tribal contacts did not identify any tribal cultural resources near the project site. Ground disturbance associated with the demolition and removal of the existing tank and construction of the new tanks would extend approximately five feet below the current ground surface, within areas previously disturbed by construction of the existing tank and/or historical agricultural clearing and cultivation. Therefore, no disturbance of intact cultural deposits (burials, middens, Native American occupied sites) would occur. However, unknown buried cultural resources (such as isolated artifacts) may be encountered during excavation at the project site.

Mitigation. The following mitigation measures are consistent with the guidelines of the State Office of Historic Preservation and shall be incorporated into the project to prevent significant impacts, should resources be found during excavation.

- Should any buried archaeological materials be uncovered during project activities, such activities shall cease within 100 feet of the find. Prehistoric archaeological indicators include obsidian and chert flakes, chipped stone tools, bedrock outcrops and boulders with mortar cups, ground stone implements, locally darkened midden soils containing previously listed items plus fragments of bone and fire affected stones. Historic period site indicators may include fragments of glass, ceramic and metal objects, milled and split timber, building foundations, privy pits, wells and dumps, and old trails. All earth disturbing work within 100 feet of the find shall be temporarily suspended or redirected until Water and Sanitation has been notified and a qualified archaeologist meeting Secretary of Interior standards has completed an assessment of the find. Work on portions of the Project outside of the assessment area may continue during this assessment period. The appropriate tribes (including the Fernandeano Tataviam Band of Mission Indians) shall be contacted regarding the findings of the assessment, to provide tribal input with regards to significance and treatment.
- Should the find be deemed significant, as defined under the State CEQA Guidelines, Water and Sanitation shall retain a professional Native American monitor to observe all remaining ground-disturbing activities in proximity to the find including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work. After the find has been appropriately mitigated, work in the area may resume.
- Water and Sanitation shall, in good faith, consult with affected tribes (including the Fernandeano Tataviam Band of Mission Indians) on the disposition and treatment of any tribal cultural resources encountered.

- If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and deposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission.

Implementation of the above measures would reduce impacts to archaeological resources to a level of less than significant.

Part 8.b Historical Resources

Setting. By 1846, most of the arable land in Ventura County had been parceled out into nineteen large ranchos, ranging in size from Rancho Simi (113,000 acres) to the Tico lot in San Buenaventura (29 acres) (Triem 1985). These ranchos involved a hacienda system of economic organization relying for the most part on native labor bound in debt peonage. The primary product of the ranchos was cattle and, to a lesser extent, sheep. Between 1848 and 1856, during the Gold Rush in the Sierra Foothills, the cattle market peaked and generated considerable wealth for many of the Spanish and Mexican rancho families in Ventura County. Thereafter, the ranchos slowly declined with the arrival of Anglo settlers and traders who brought with them a more developed system of resource exploitation.

This, combined with the difficulties in providing legal title to the land grants with the advent of the Land Act of 1851, served to weaken Hispanic control over the local economy. By the 1870's, a majority of the rancho lands were in the hands of Anglos who transformed the face of Ventura County. The cattle industry declined and was quite rapidly replaced by agriculture and an increasing interest in oil exploration and production.

Until 1873, Ventura County was part of Santa Barbara County, but the difficulties of traveling to Santa Barbara and the natural geographic cohesiveness of the Ventura County region was recognized early on. With oil, agriculture and shipping taking the lead, the 1870's gave rise to much of the structure which characterizes the County to this day. Many of the communities were founded during the 1870's, including Santa Paula (which was the second largest town after San Buenaventura by 1879), and Port Hueneme. Thomas Bard, the County's only United States Senator, laid out the port in 1869 and had grand plans for a western rail hub. His wharf, completed in 1871, instead became a focus of harvest time agricultural shipments to the East. Oxnard did not get its start until 1889 with the completion of the Oxnard Brother's sugar beet factory, and was incorporated in 1903. The 1870's also saw Nordhoff laid out, later changed back to its original name of Ojai. The railroads, which arrived in 1886, spurred the growth of the Santa Clara River towns of Fillmore, Bardsdale and Piru, and helped increase County population from 5,073 in 1880 to 10,071 in 1890. Santa Paula also prospered from the railroad. The oil industry grew quickly in the 1880's, especially in and around the Ojai and Sespe fields, which continue in production today. Other important industries established prior to the turn of the century were citrus ranching, especially navel oranges, and tourism, centered on Ojai and Santa Paula's natural hot spring resorts.

A second tier of towns was laid out with the completion of a faster San Francisco - Los Angeles rail link through Santa Susana Pass in 1901. Camarillo, Moorpark and Santa Susana (later, Simi Valley) all were founded and grew up around the Southern Pacific depots of the railroad line. Newbury Park and the Conejo Valley had a somewhat different origin, having developed as dry farming and cattle ranching areas serviced by an overland stagecoach line.

In 1916, the Ventura oil field in the Ventura Avenue area, was discovered. This created a development boom in Ventura and to a lesser extent, in the Santa Paula and Fillmore areas which also increased their oil production. The decade of the 1920's saw increased building activity and the development of the California bungalow as a distinct architectural style as large areas were built up for oil field worker housing. The disaster of the stock market crash of 1929 was preceded by another disaster in Ventura County which has yet to be rivaled. On March 12, 1928, the Saint Francis Dam in San Francisquito Canyon near Castaic, gave way, killing 400 people and destroying more than 1,200 homes and 7,900 acres of farmland in the Santa Clara River Valley (Triem 1985).

The Depression of the 1930's, although difficult for Ventura County farmers and businesses, has left the County with a wealth of architectural monuments. Particularly, through the many New Deal relief programs instituted after 1933, a good deal of the County's infrastructure in the form of roads, post offices, fire stations, schools and public art works was created. In addition, an influx of immigrants from the hard hit central and southern United States put down roots in Ventura County during this period. And beginning in 1940 with the completion of the U.S. Navy's deep-water port facilities in Port Hueneme, the military and, to a lesser extent, the fishing industry, became important elements in the rich economic mix of southern Ventura County.

The nearest Ventura County designated landmarks are the Somis Thursday Clubhouse, Fulkerson Hardware and Somis School, located in Somis approximately 1.2 miles west of the project site.

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts to historic resources include:

1. Demolishes or materially alters 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.
2. Demolishes or materially alters 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 Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, 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.

3. Demolishes or materially alters in an adverse manner those physical characteristics of an 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.

Impacts (NI). No historic structures or properties would be adversely affected by implementation of the proposed project. The existing tank to be demolished is not considered a historic resource because it is less than 50 years old and does not exhibit any distinctive architectural features.

ISSUE 9: COASTAL BEACHES AND SAND DUNES

Setting. The nearest coastal beach (Thornehill Broome State Beach) is located approximately 12.3 miles to the south-southwest of the project site. The nearest sand dunes are located at Point Mugu State Park, approximately 12.5 miles south-southwest of the project site.

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts to coastal beaches and sand dunes include:

1. 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 Ventura County General Plan Goals, Policies and Programs.
2. Any project, when considered together with one or more recently approved, current, and reasonably foreseeable probable future projects, would result in a direct or indirect, adverse physical change to a coastal beach or sand dune.

Impacts (NI). The proposed project would not directly affect any beaches or sand dunes. The project would not indirectly affect beaches and sand dunes because it would not alter the volume or rate of sediment generated or transported to local beaches and sand dunes.

ISSUE 10: FAULT RUPTURE HAZARD

Setting. The entire Southern California region, including the Ventura County area, is located within a seismically active area. The nearest mapped fault (Simi) is located approximately 0.5 miles south of the project site (Dibblee, 1992). Surface evidence north of Simi Valley and within Santa Rosa Valley indicates this fault has been active during Holocene time (0-11,000 years before present). No faults are known to pass through the project site, and it is not located within a designated Alquist-Priolo Special Studies Zone.

Significance Thresholds. The project would have a significant impact if it would place persons or property at risk of loss of life or damage due to fault rupture.

Impacts (NI). As described above, the project site is not within an Alquist-Priolo Special Study Zone or seismic hazard zone. The proposed new tanks would be designed and constructed to safely withstand the predicted fault rupture hazard identified in the project-specific geotechnical study (Oakridge Geoscience, 2021), would not affect off-site fault rupture hazards, and would not increase the number of persons exposed to fault rupture hazards.

ISSUE 11: GROUND-SHAKING HAZARD

Setting. Ground-shaking is the cause of most damage during earthquakes. The project area has a 10 percent chance of exceeding a peak ground acceleration of 0.62 g (alluvium conditions) in 50 years (California Department of Conservation 2000).

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts related to ground-shaking hazard include:

- Proposed structures not designed to be built in accordance with all applicable requirements of the Ventura County Building Code, which has the potential to expose people or other structures to potential significant adverse effects, including the risk of loss, injury or death involving ground shaking hazards.
- Significant impacts from ground-shaking hazards would result for projects involving high-rise structures, critical facilities, and projects of unique design not covered by ordinary provisions of the Uniform Building Code. Such projects may subject persons and property to greater risk of loss of life or substantial damage during strong ground-shaking events.

Impacts (NI). The proposed new tanks would be designed and constructed to safely withstand the predicted ground-shaking identified in the project-specific geotechnical study (Oakridge Geoscience, 2021), would not affect off-site ground-shaking hazards, and would not increase the number of persons exposed to ground-shaking hazards.

ISSUE 12: LIQUEFACTION HAZARDS

Setting. Liquefaction occurs when strong, cyclic motions during an earthquake cause water-saturated soils to lose their cohesion and take on a liquid state. Liquefied soils are unstable and can subject overlying structures to substantial damage. The occurrence of liquefaction is highly dependent on local soil properties, depth to groundwater, and the strength and duration of a given ground-shaking event. The project site is not located within a liquefaction hazard zone as designated by the California Department of Conservation (2000).

Significance Thresholds. The project would have a significant impact if liquefaction hazards would subject persons or property to loss of life or substantial injury or damage. Projects located within liquefaction hazard areas identified by the California Department of Conservation may result in significant adverse effects.

Impacts (NI). The proposed new tanks would be designed and constructed to safely withstand the predicted liquefaction stresses identified in the project-specific geotechnical study (Oakridge Geoscience, 2021), would not affect off-site liquefaction hazards and would not increase the number of persons exposed to liquefaction hazards.

ISSUE 13: SEICHE AND TSUNAMI HAZARDS

Setting. Tsunamis are seismically induced sea waves that can be of sufficient size to cause substantial damage to coastal areas. The last major tsunami in Southern California was in 1812, generated by an earthquake in the Santa Barbara Channel. The largest tsunami wave amplitude recorded by modern instrumentation in Ventura County was 8.8 feet, associated with the Chilean earthquake of 1960. In 2010, an earthquake in Chile generated a tsunami which caused minor damage to structures and vessels in the Ventura Harbor. A tsunami generated by a volcanic eruption in Tonga in January 2022 caused minor damage to a few boats in the Ventura Harbor. The nearest tsunami inundation hazard area is located approximately 13.0 miles south of the project site near Sequit Point (California Emergency Management Agency 2009).

Seiches are oscillating waves that occur in enclosed or semi-enclosed bodies of water such as lakes and bays. Seiches are commonly caused by earthquakes. There is no record of a seiche occurring in Ventura County. The nearest body of water that may be subject to seiches is Lake Bard, located approximately 8.3 miles east of the project site.

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts related to seiche and tsunami hazards include:

1. The proposed project is located within about 10 to 20 feet of vertical elevation from an enclosed body of water such as a lake or reservoir. The 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.
2. The proposed project is located in a mapped area of tsunami hazard as shown on Tsunami Inundation Maps prepared by the California Emergency Management Agency.

Impacts (NI). The proposed project is not located in a tsunami hazard zone and would not increase the severity or the number of persons potentially affected by a tsunami. The proposed project is not located in a seiche hazard zone and would not increase the severity or the number of persons potentially affected by a seiche.

ISSUE 14: LANDSLIDES/MUDFLOW HAZARD

Setting. Areas of high landslide or mudflow potential are typically hillside areas with slopes of greater than 10 percent. The project site is located on a large landslide complex referred to as the Somis Landslide (Oakridge Geoscience, 2021) and is within a seismically-induced landslide hazard area (California Department of Conservation 2000).

Significance Thresholds. A project would have a significant impact if the project site would be affected by a landslide/mudflow hazard or contribute to landslides/mudslides that could not be mitigated. The threshold for landslide/mudflow hazard is determined by the Public Works Agency Certified Engineering Geologist based on the location of the site or project within, or outside of mapped landslides, potential earthquake induced landslide zones, and geomorphology of hillside terrain.

Impacts (LS). Removal of artificial fill and re-compaction at the project site as recommended by Oakridge Geoscience (2021) is sufficient to minimize the landslide hazard. Therefore, the project would not result in any hazards associated with landslides or mudslides.

ISSUE 15: EXPANSIVE SOILS HAZARDS

Setting. Expansive soils are primarily clay-rich soils subject to changes in volume with changes in moisture content. Based on the regional soil map, soils at the project site are mapped as Huerhuero very fine sandy loam with a moderate shrink-swell potential (Edwards et al. 1970). Soils encountered at the project site are considered to have a low expansion potential (Oakridge Geoscience, 2021).

Significance Thresholds. The determination of a significant soils expansion effect shall be based upon an inquiry of whether a proposed project will expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving soil expansion if it is located within an expansive soils hazard zone or where soils with an expansion index greater than 20 are present.

Impacts (NI). Soils at the project site are not highly expansive. The proposed new tank foundations would be designed to safely withstand predicted soil expansion and would not increase the number of persons exposed to these hazards.

ISSUE 16: SUBSIDENCE HAZARD

Setting. Subsidence is generally related to over-pumping of groundwater or petroleum reserves from deep underground reservoirs. Subsidence of up to 2.2 feet occurred in the Pleasant Valley area by the early 1970's due to over-pumping of groundwater in this area (Fox Canyon Groundwater Management Agency 2007). The project site is not located within a probable subsidence zone identified in the Ventura County 2040 General Plan Background Report.

Significance Thresholds. The determination of a significant subsidence effect is based upon an inquiry of whether a proposed project will expose people or structures to potential adverse effects, including the risk of loss, injury, or death involving subsidence if it is located within a subsidence hazard zone.

Impacts (NI). Groundwater levels in the area are not substantially declining and subsidence is not anticipated. As such, the project would neither cause nor be subjected to ground subsidence, and would have no impact.

ISSUE 17: HYDRAULIC HAZARDS

Part 17.a Non-FEMA (Erosion & Siltation)

Setting. Generally speaking, erosion is the wearing away of soil and rock by weathering, mass wasting, and the action of streams, glaciers, waves, wind and underground water. The process of deposition of sediment from a state of suspension in water or air is referred to as sedimentation or siltation. There are no non-FEMA flood control facilities in proximity to the project site.

Significance Thresholds. The project would have a significant impact if it would cause substantial erosion or siltation. Potential erosion/siltation hazards and flooding hazards are addressed through compliance with the Ventura County Watershed Protection District's Standards and Specifications Design Manual. Erosion/siltation hazards and the effects of flooding hazards are required to be considered within the existing framework of grading and building code ordinances, which apply to all sites and projects.

Impacts (NI). Proposed tank demolition and removal and new tanks construction activities would not occur within a floodway or floodplain or result in excessive erosion that may cause siltation of flood control facilities. Therefore, no impacts to non-FEMA facilities would occur.

Part 17.b FEMA

Setting. The project site is located approximately 2,600 feet from the FEMA-regulated floodway and floodplain (1% annual chance) of Arroyo Las Posas (Flood Insurance Rate Map panel 06111C0813E, effective January 20, 2010).

Significance Thresholds. Methodology to determine the significance of impacts is taken from the Ventura County ISAG:

- No Impact: If the entire development is located outside of the boundaries of a Special Flood Hazard Area and is located entirely within a FEMA-determined 'X-Unshaded' flood zone (beyond the 0.2% annual chance floodplain: beyond the 500-year floodplain).
- Less than Significant: If the entire development is located outside of the boundaries of a Special Flood Hazard Area and is located entirely within a FEMA-determined 'X-Shaded' flood zone (within the 0.2% annual chance floodplain: within the 500-year floodplain). If the proposed development, in part or in whole, is located within the boundaries of a Special Flood Hazard Area, but is located outside of the boundaries of the Regulatory Floodway, if it can be demonstrated that the proposed development can be designed and constructed, as part of the Floodplain Development Permit and Building Permit processes, to be in compliance with all applicable floodplain management standards and measures.
- Potentially Significant – Mitigation Incorporated: Potentially significant impacts from the 1% annual chance flood can be mitigated through project design or measures, such as but not limited to, relocating the proposed development elsewhere on the property where the risk of flood damage is potentially lower, implementing FEMA-supported building construction and grading technologies that mitigate flood damage and thereby reducing the risk of the flood hazard.
- Potentially Significant: If the proposed development, in part or in whole, is located within the boundaries of the Regulatory Floodway, as determined using the 'Effective' and latest available Flood Insurance Rate Maps.

Impacts (NI). The proposed project does not involve any activities or placement of structures or materials within the floodway or flood hazard area, and would not affect flood water elevations.

ISSUE 18: FIRE HAZARDS

Setting. Ventura County Building Code, Article III Section 702A identifies High Fire Hazard Areas/Fire Hazard Severity Zones as “geographical areas in unincorporated Ventura County designated by the Ventura County Fire Protection District pursuant to California Public Resources Codes Sections 4201 through 4204 and classified as Very High, High, or Moderate in State Responsibility Areas or as Local Agency Very High Fire Hazard Severity Zones designated pursuant to California Government Code, Sections 51175 through 51189. The Fire Code also defines Hazardous Watershed Fire Areas as a location within 500 feet of a 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.

The project site is located within a moderate fire hazard severity zone as designated by the California Department of Forestry and Fire Protection. The project site is served by Ventura County Fire Department Station 52, which includes two engines. Station 52 is located approximately 3.5 road miles from the project site (via Worth Way).

Significance Thresholds. Projects located within High Fire Hazard Areas/Fire Hazard Severity Zones or Hazardous Watershed Fire Areas may have a significant fire hazard impact. The fire hazard impact can be mitigated by compliance with Building and Safety requirements for structures and the Fire Protection District Hazard Abatement program which calls for the clearing of brush, flammable vegetation, or combustible growth located within 100 feet of structures or buildings. Projects not located within High Fire Hazard Areas/Fire Hazard Severity Zones or Hazardous Watershed Fire Areas will not have a significant impact.

Impacts (LS). The project site does not support flammable vegetation and surrounding areas support irrigated orchards. Project-related ignition sources may include heavy equipment and hand tools (including welders and grinders) and motor vehicles. All demolition and construction equipment and vehicles would be equipped with manufacturer-supplied mufflers as appropriate, and water applied for dust control (see emissions reduction measures under Issue 1.a) would minimize the potential for ignition of any vegetation. Overall, potential increases in fire hazard are considered less than significant.

ISSUE 19: AVIATION HAZARDS

Setting. The project site is located approximately 6.0 miles northeast of the Camarillo Airport, and outside the Airport’s sphere of influence.

Significance Thresholds. A review of a project's potential aviation hazards, as those hazards relate to proposed development of properties near County public airports, will focus on that project's compliance with the County's Airport Comprehensive Land Use Plan and pre-established federal criteria set forth in Federal Aviation Regulation Part 77 (Obstruction Standards), as well as those recommendations for good land-use planning made by state and county governments. The Airport Land Use Commission will give special attention to all residential development within the sphere of influence of County airports, as well as churches, schools and high commercial purpose buildings within the same sphere of influence. Projects which do not meet these applicable criteria may have the potential to cause a significant aviation impact.

Impacts (NI). The project would not adversely affect aircraft operations or implementation of the Airport Comprehensive Land Use Plan. The project would not involve any activities or structures that are incompatible with the safe operation of aviation facilities and impacts to aviation safety would not occur.

ISSUE 20: HAZARDOUS MATERIALS/WASTE

Part 20.a Materials

Setting. A "hazardous material" means any material that, because of its quantity, concentration, physical or chemical characteristics poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or environment. A review of the State Water Resources Control Board's GeoTracker data base identified nine leaking underground storage tank sites within two miles of the project site that had leaked gasoline, diesel fuel or oil. Each of these sites has been closed and would not have adversely affected the project site.

A Preliminary Environmental Assessment was conducted to assess the potential health risk for a new school proposed in Somis, which identified arsenic, acetone, butanone, DDT, lead and petroleum hydrocarbons in soil at the school site. However, the measured concentrations of these contaminants were considered to be below action levels. No other hazardous materials sites are located in the project area.

Significance Thresholds. Methodology to determine the significance of impacts is taken from the Ventura County ISAG:

- No Impact: the proposed project will not utilize hazardous materials.

- Less than Significant: A project will utilize hazardous materials that are subject to regulation by the Environmental Health Division and/or Ventura County Fire Protection District (VCFPD). Compliance with applicable state regulations enforced by the Environmental Health Division and/or VCFPD will reduce potential project related and cumulatively impacts to a less than significant level. A determination of less than significant will be made when the project will utilize hazardous materials and will be connected to an onsite sewage disposal system. For development in areas without public sewer service, intentional or unintentional discharges of hazardous materials into a building's plumbing system may result in groundwater contamination. State regulations have been enacted to ensure that public health, the environment and natural resources are protected from potential adverse impacts from the improper storage, handling and disposal of hazardous materials. Compliance with these State regulations will reduce potential impacts to a less than significant level.
- Potentially Significant - Mitigation Incorporated: Project related and cumulatively potentially significant impacts from hazardous material(s) can be successfully mitigated to a less than significant level by project design or measures using currently acceptable technology and/or through adoption of specific project condition. Compliance with applicable regulations enforced by the Environmental Health Division and through adoption of a specific project conditions will mitigate existing underground tanks not in compliance to a less than significant level.
- Potentially Significant: Project related and cumulatively significant or potentially significant impacts from hazardous materials cannot be feasibly mitigated to a less than significant level using currently available information.

Impacts (LS). Agricultural areas have the potential for soil contamination associated with recent and/or historical pesticide application and fueling and maintenance of farm equipment and vehicles. However, the project site has supported a water tank since 1975 such that activities that may cause soil contamination (pesticide application, vehicle fueling and maintenance) have been precluded since that time. In addition, soils to be exposed during tank demolition and removal and construction of the new tanks are mostly composed of clean fill utilized in construction of the existing tank. Overall, the potential for the discovery of substantial soil contamination and significant exposure of the public and the environment to hazardous materials during tank demolition and construction is not anticipated. In addition, storage of hazardous materials or hazardous waste is not proposed.

Part 20.b Hazardous Waste

Setting. Hazardous materials are defined as any substance, which if improperly handled, can be damaging to the health and well-being of humans or the environment. Hazardous materials become hazardous waste when the material has been used for its original intended purpose and is going to be discarded or recycled.

Significance Thresholds. Methodology to determine the significance of impacts is taken from the Ventura County ISAG:

- No Impact: The proposed project will not produce hazardous waste.
- Less than Significant: The project will produce hazardous waste that is subject to State regulations enforced by the Environmental Health Division. The project will produce hazardous waste and will be connected to an onsite sewage disposal system. A determination of less than significant will be made when the project will utilize hazardous materials and will be connected to an onsite sewage disposal system. For development in areas without public sewer service, intentional or unintentional discharges of hazardous materials into a building's plumbing system may result in groundwater contamination. State regulations have been enacted to ensure that public health, the environment and natural resources are protected from potential adverse impacts from the improper storage, handling and disposal of hazardous materials. Compliance with these State regulations will reduce potential impacts to a less than significant level.
- Potentially Significant - Mitigation Incorporated: The project will produce hazardous waste, and the Environmental Health Division identifies that a potentially project-related and cumulative significant impact is present which can be successfully mitigated to a less than significant level by project design or measures using currently acceptable technology and/or through adoption of specific project condition.
- Potentially Significant: If the Environmental Health Division finds that the character and quantity of the hazardous waste produced by the project and cumulative projects may seriously degrade groundwater that cannot be feasibly mitigated to a less than significant level.

Impacts (NI). The proposed project is limited to demolition and removal of an existing water tank and construction of new tanks. Therefore, no hazardous waste would be generated, and no impacts would occur.

ISSUE 21: NOISE AND VIBRATION

Setting. Noise is generally defined as unwanted or objectionable sound. Noise levels are measured on a logarithmic scale because of physical characteristics of sound transmission and reception. Noise energy is typically reported in units of decibels (dB). Noise levels diminish (or attenuate) as distance to the source increases according to the inverse square rule, but the rate constant varies with the type of sound source. Sound attenuation from point sources such as industrial facilities is about 6 dB per doubling of distance. Heavily traveled road with few gaps in traffic behave as continuous line sources and attenuate at 3 dB per doubling of distance. Noise from more lightly traveled roads is attenuated at 4.5 dB per doubling of distance.

Community noise levels are measured in terms of the A-weighted decibel (dBA). A-weighting is a frequency correction that correlates overall sound pressure levels with the frequency response of the human ear. Equivalent noise level (Leq) is the average noise level on an energy basis for a specific time period. The duration of noise and the time of day at which it occurs are important factors in determining the impact of noise on communities. Noise is more disturbing at night and noise indices have been developed to account for the time of day and duration of noise generation. The Community Noise Equivalent Level (CNEL) and Day-Night Average Level (DNL or Ldn) are such indices. These indices are time-weighted, and average acoustic energy values over a 24-hour period. The CNEL index penalizes nighttime noise (10 p.m. to 7 a.m.) by adding 10 dB and evening noise (7 p.m. to 10 p.m.) by adding 5 dB to account for increased sensitivity of the community during these hours. The Ldn index penalizes nighttime noise the same as the CNEL index but does not penalize evening noise.

The dominant source of noise in the project area is motor vehicle traffic on local roadways (primarily State Route 118, State Route 34), cargo and passenger rail traffic on the Union Pacific Railroad/Metrolink tracks, and occasional use of agricultural equipment. Consistent with the Ventura County ISAG, noise sensitive uses are considered dwellings, schools, hospitals, nursing homes, churches and libraries. Existing noise sensitive uses in proximity to the project site are limited to ten residences on the ridgeline to the south, and three residences near Arroyo Las Posas to the west-northwest of the project site. The nearest residence is approximately 1,100 feet southeast of the project site.

Noise levels were measured near the closest noise receptor (residence on Worth Way) on October 22, 2019 from 9:01 to 9:26 a.m. The measurement was conducted using a Larson-Davis LXT Type 1 Precision Integrating Sound Level Meter. The Meter was calibrated using a Larson-Davis CAL200 calibrator at 94 dBA. The measured noise value was 54.8 dBA Leq, indicating noise levels in the project vicinity are moderate and typical of daytime noise in a rural area. The primary noise sources during the noise measurement period were very light traffic (about 10 vehicles per hour) on Worth Way and wind in the eucalyptus trees along Worth Way.

Significance Thresholds. Policy HAZ-9.2 of the Ventura County 2040 General Plan provides the following thresholds:

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 Leq during any hour.

Noise generators proposed to be located near any noise sensitive use shall incorporate noise control measures so that ongoing outdoor noise levels received at the noise receptor, measured at the exterior wall of the building do not exceed any of the following standards:

- Leq1H of 55 dBA or ambient noise level plus 3 dBA, whichever is greater, during any hour from 6 a.m. and 7 p.m.

- Leq1H of 50 dBA or ambient noise level plus 3 dBA, whichever is greater, during any hour from 7 p.m. and 10 p.m.
- Leq1H of 45 dBA or ambient noise level plus 3 dBA, whichever is greater, during any hour from 10 p.m. and 6 a.m.

2040 General Plan Policy HAZ-9.2(5) requires construction noise to be evaluated and mitigated in accordance with the Construction Noise Threshold Criteria and Control Plan prepared by Advanced Engineering Acoustics (2010). Based on this document, noise-sensitive receptors include:

- Hospitals and nursing homes (sensitive 24 hours/day).
- Residences (sensitive during evening and nighttime – 7 pm to 7 am).
- Hotels and motels (sensitive during evening and nighttime).
- Schools, churches and libraries (daytime and evening, when in use).

Project-related demolition and construction activities are planned to be limited to 7 a.m. to 5 p.m.; therefore, local residences would not be considered noise-sensitive receptors. However, if evening or nighttime construction work occurs, the following noise thresholds would apply:

- 50 dBA Leq OR ambient noise level + 3 dBA, for evening construction (7 to 10 p.m.)
- 45 dBA Leq OR ambient noise level + 3 dBA, for nighttime construction (10 p.m. to 7 a.m.)

Impacts (LS). The proposed project would generate noise during proposed tank demolition and removal and tank construction. Potential noise sensitive receptors in the project area are limited to residences, located at least 1,100 feet from the project site. Peak day tank construction noise (foundation excavation) was estimated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model, composed of simultaneous operation of a dozer, excavator and wheeled loader. The results of the noise modelling indicates the peak day construction noise level would be 54.1 dBA Leq at the nearest residence, which is less than the ambient noise level measured on October 22, 2019. Work would not be conducted during the evening or nighttime; therefore, local residences are not considered noise-sensitive receptors and construction noise impacts are considered less than significant.

Construction-related vibration was estimated using methodology provided by the Federal Transit Administration (2006), which indicates construction-related vibration (based on use of a large dozer) at the nearest structure (1,100 feet away) would be 38 Lv¹, which is less than the vibration damage criteria for non-engineered timber and masonry buildings (94 Lv). Therefore, vibration impacts would be less than significant.

¹ Lv: Root mean square velocity in decibels referenced to 1 micro-inch/second

ISSUE 22: DAYTIME GLARE

Setting. Sources of light in the immediate project area are limited to exterior lighting at residential land uses, vehicle headlights on roadways (State Route 118, State Route 34) and lighting on trains. The project site does not have any existing lighting or reflective surfaces.

Significance Thresholds. The project would have a significant impact if:

- The proposed project would create a new source of disability glare or discomfort glare for motorists travelling on any road of the County's Regional Road Network.
- The post-project luminance histogram (generated by a computer-based comparison of before and after digital photographs) would be greater than 3 times the median background.

Impacts (NI). Proposed demolition and construction activities would be conducted during daytime and would not involve any reflective surfaces or lighting. The proposed new tanks would not have any reflective surfaces. Proposed security lighting would be shielded and directed towards the ground and would not affect any motorists.

ISSUE 23: PUBLIC HEALTH

Setting. A public health issue is defined by the County's ISAG as a human health related issue, such as, but not limited to, vectors, bioaerosols, and other pathogens or environmental factors that may pose a substantial present or potential hazard to public health. Note that hazardous materials or waste that may adversely affect human health are addressed under Issue 20.

Significance Thresholds. Significance for public health related impacts must be determined on a case-by-case basis, and is related to project type, location, and other environmental factors.

Impacts (NI). The project would not generate or benefit vectors, bioaerosols, and other pathogens or environmental factors that may pose a substantial present or potential hazard to public health.

ISSUE 24: GREENHOUSE GASES

Setting. Greenhouse Gases (GHGs), defined as any gas that absorbs infrared radiation in the atmosphere, include, but are not limited to, water vapor, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorocarbons. These GHGs trap and build up heat in the atmosphere near the earth's surface, commonly known as the Greenhouse Effect. The atmosphere and the oceans are reaching their capacity to absorb CO₂ and other GHGs, leading to significant global climate change in the future.

Unlike typical air pollutants, which are pollutants of regional and local concern, GHGs and climate change are a local, regional, and global issue. There is widespread international scientific consensus that human-caused increases in GHGs have and will continue to contribute to climate change, although there is uncertainty concerning the magnitude and rate of the warming.

CO₂ is also used as a reference gas for climate change. To account for different GHG global warming potentials, emissions are often quantified and reported as CO₂ equivalents (CO₂E). Currently, the CO₂ global warming potential is set at a reference value of 1, CH₄ has a global warming potential of 27.9 (i.e., 1 ton of methane has the same warming potential as 27.9 tons of CO₂), while nitrous oxide has a warming potential of 273.

Each of the last four decades has been successively warmer than any decade that preceded it since 1850. Global surface temperature in the first two decades of the 21st century (2001-2020) was 1.8°F higher than 1850-1900. Global surface temperature was 2.0°F higher in 2011–2020 than 1850–1900, with larger increases over land (2.9°F) than over the ocean (1.6°F). The current estimated increase in global surface temperature is greater than previous estimates principally due to further warming since 2003–2012.

Global mean sea level increased by 0.66 feet between 1901 and 2018. The average rate of sea level rise was 0.051 inches per year between 1901 and 1971, increasing to 0.075 inches per year between 1971 and 2006, and further increasing to 0.15 inches per year between 2006 and 2018. Human influence was very likely the main driver of these increases since at least 1971 (Intergovernmental Panel on Climate Change 2021).

In 2021, the average contiguous U.S. temperature was 54.5°F, 2.5°F above the 20th-century average and ranked as the fourth-warmest year in the 127-year period of record. The six warmest years on record have all occurred since 2012. The December 2021 contiguous U.S. temperature was 39.3°F, 6.7°F above average and exceeded the previous record set in December 2015.

Climate change is having and will continue to have widespread impacts on California's environment, water supply, energy consumption, public health and economy. Many impacts already occur, including increased fires, floods, severe storms, and heat waves. Documented effects of climate change in California include increased average, maximum, and minimum temperatures; decreased spring runoff to the Sacramento River; shrinking glaciers in the Sierra Nevada; sea-level rise at the Golden Gate Bridge and San Francisco Bay; warmer temperatures in Lake Tahoe, Mono Lake, and other major lakes; and plant and animal species found at changed elevations (California Governor's Office of Planning and Research 2018a).

The primary legislation affecting GHG emissions in California is the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32). AB 32 (Nuñez; Chapter 488, Statutes of 2006) focuses on reducing GHG emissions in California and required the State to reduce GHG emissions to 1990 levels by 2020. CARB prepared a Draft Scoping Plan for Climate Change in 2008 pursuant to AB 32. The Climate Change Scoping Plan was updated in May 2014, in November 2017 and a 2022 Climate Change Scoping Plan is in progress.

In 2016, the State met the AB 32 target, 4 years early. The State Legislature passed Senate Bill (SB) 32 (Pavley; Chapter 249, Statutes of 2016), which codifies a 2030 GHG emissions reduction target of 40 percent below 1990 levels. With SB 32, the Legislature passed companion legislation AB 197, which provides additional direction for developing the Scoping Plan. The 2017 update to the Scoping Plan focuses on strategies to achieve the 2030 target set by Executive Order B-30-15 and codified by SB 32.

As part of the Ventura County 2040 General Plan, a GHG emissions reduction strategy (which serves as the County's Climate Action Plan) was prepared and integrated with the General Plan as Appendix B. A baseline GHG inventory was prepared using a baseline year of 2015 and focusing on community-wide emissions. As indicated within General Plan Appendix B (Figure B-1), transportation (36%), solid waste (17%), building energy (17%), stationary source (16%), and agriculture (13%) made up the majority of GHGs in unincorporated Ventura County. The County's GHG emissions forecast predicts a 7.8 percent decrease from the 2015 baseline by the year 2050 for unincorporated Ventura County, based on implementation of existing state and federal regulations. Ventura County GHG reduction goals and targets are similar to the state targets, but are focused on reductions in the County's 2015 GHG inventory:

- Two percent below 2015 levels by 2020
- 41 percent below 2015 levels by 2030
- 61 percent below 2015 levels by 2040
- 80 percent below 2015 levels by 2050

Significance Thresholds. To date, GHG thresholds of significance have not been adopted by Ventura County. On November 8, 2011, the Ventura County APCD completed a staff report assessing several options and strategies in developing GHG thresholds for land development projects. Although no GHG thresholds were developed, the November 8, 2011 staff report stated that consistency with any GHG thresholds developed by the South Coast Air Quality Management District (SCAQMD) is preferred. On December 5, 2008, the SCAQMD governing board adopted an interim GHG significance threshold of 10,000 metric tons per year CO₂ equivalent (including amortized construction emissions) for industrial projects. Due to the lack of any other applicable threshold, this value is used in this analysis to determine the significance of the contribution of the project to global climate change.

Impacts (LS). Construction. GHG emissions associated with proposed tank demolition and removal and construction of the tank pad and new tanks were estimated using the OFFROAD 2021 and EMFAC 2017 models. These models were selected as they were developed by CARB for the preparation of emissions inventories and are appropriate for the emissions sources associated with the project. Peak year (tank pad and Tank 1 construction) greenhouse gas emissions would be 176.7 MT CO₂E. Since annual GHG emissions would be less than the significance threshold, global climate change impacts are considered less than significant.

Operation. Phase 2 of the proposed project includes a booster pump station and Phase 3 includes an emergency generator. Generation of electricity used by the proposed booster pump station by Southern California Edison would generate GHG emissions. GHG emissions associated with pump station electrical consumption were estimated (see Table 6) based on the planned operating schedule, average daily electrical demand and GHG emissions factors from the CalEEMod ver. 2020.4.0 emissions model.

Testing of the emergency generator would also generate GHG exhaust emissions. These emissions were estimated using the planned testing schedule and emissions factors from the California 2000-2014 GHG Inventory. Overall, operational annual GHG emissions would not exceed the 10,000 MT CO₂E significance threshold and are considered a less than significant impact to global climate change.

Table 6. Operational Annual GHG Emissions

Source	Estimated Annual Hours	Annual GHG Emissions (MT CO ₂ E)
Emergency generator testing	24	4.7
Booster pump station operation	416	11.4
Total		16.1
<i>Interim GHG significance threshold</i>		<i>10,000</i>

ISSUE 25: COMMUNITY CHARACTER

Setting. The project site is located within an agricultural area and surrounded by crops. Single-family residential areas are located at least 0.6 miles to the south (north of Upland Road), including The Pinnacle and Calarosa Ranch. A few large residential estates are located on large lots along the ridgeline south of the project site. The zoning of the project site is Agricultural-Exclusive (AE 40 ac).

Significance Thresholds. The project would have a significant impact to community character if it was:

1. A project that is inconsistent with any of the policies or development standards relating to community character of the Ventura County General Plan Goals, Policies and Programs or applicable Area Plan, is regarded as having a potentially significant environmental impact; and/or
2. A project has the potential to have a significant impact on community character, if it either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable probable future projects would introduce physical development that is incompatible with existing land uses, architectural form or style, site design/layout, or density/parcel sizes within the community in which the project site is located.

Impacts (NI). The project consists of the replacement of an existing water tank in an agricultural area and would not have any effect on the character of nearby communities.

ISSUE 26: HOUSING

Setting. The project site is located within an agricultural area and surrounded by crops. Single-family residential areas are located at least 0.6 miles to the south (north of Upland Road), including The Pinnacle and Calarosa Ranch. A few large residential estates are located on large lots along the ridgeline south of the project site.

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts to housing include:

1. Elimination of three or more dwelling units that are affordable to households with moderate income levels (coastal zone) or lower income (entire County) is considered a significant project-specific and cumulative impact on existing housing.
2. Projects that result in 30 or more new full-time-equivalent ("FTE") lower-income employees.

Impacts (NI). The project would not involve the removal of any existing housing. However, any project that would involve construction has the potential to generate a demand for construction worker housing. Any employment opportunities associated with proposed tank demolition and construction activities are not expected to generate demand for housing, due to the short-term nature and small number of workers needed (about 12 on average). Therefore, these services are anticipated to be supplied by existing construction workers within the County, and an impact on housing demand is not anticipated.

ISSUE 27: TRANSPORTATION/CIRCULATION

The following analysis is consistent with the Ventura County ISAG, which have not been updated to address revisions to the State CEQA Guidelines (Section 15064.3) regarding determining the significance of transportation impacts. These revisions focus on increases in vehicle miles travelled associated with proposed changes in land use. The proposed project does not involve any change in land use as the project site would remain a water storage tank site and would not generate any new vehicle miles.

Setting. The quality of traffic service provided by a roadway system can be described through the Level of Service (LOS) concept. LOS is a standardized means of describing traffic conditions by comparing traffic volumes in a roadway system with the system's capacity. An LOS rating of A-C indicates that the roadway is operating efficiently. Minor delays are possible on an arterial with a LOS of D. Level E represents traffic volumes at or near the capacity of the highway, resulting in possible delays and unstable flow.

The project site is accessed from Upland Road, a secondary 4-lane arterial within the City of Camarillo, which links State Route 34 (Lewis Road/Somis Road) to Santa Rosa Road. The Upland Road intersections at State Route 34 and Flynn Road currently operate at LOS A during a.m. and p.m. peak hour (Stantec, 2016).

Part 27.a Roads and Highways

County Roadway Significance Thresholds. Excluding five roadway segments, the minimum acceptable level of service for County maintained local roads is LOS C, and LOS D for County thoroughfares and state highways. The minimum acceptable level of service is LOS E for the portion of State Route 34 north of Camarillo, which is located approximately 1.2 miles west of the project site. A project would have a significant impact on roads and highways if it would:

- Add one or more peak hour trip to a roadway currently operating at an unacceptable LOS.

- Cause a roadway to fall below an acceptable LOS.

County Intersection Significance Thresholds. The project would have a significant impact on an intersection if it would:

- Increase volume/capacity ratios (V/C) by 0.20 for intersections operating at LOS A.
- Increase V/C by 0.15 for intersections operating at LOS B.
- Increase V/C by 0.10 for intersections operating at LOS C.

City of Camarillo Intersection Significance Thresholds. The project would have a significant impact on an intersection if it would:

- Reduce intersection LOS to D or below.
- Add 30 per lane peak hour critical movement trips at intersections operating at LOS D.
- Add 20 per lane peak hour critical movement trips at intersections operating at LOS E.
- Add 10 per lane peak hour critical movement trips at intersections operating at LOS F.

27.a(1) Roads and Highways Level of Service

Impacts (LS). The proposed project would generate construction-related vehicle traffic on Upland Road, with about 40 one-way trips on a peak day. However, many of these trips would occur during off-peak hours because proposed demolition and construction activities would generally begin prior to a.m. peak hour and typically end at or before p.m. peak hour. In any case, Upland Road operates at an acceptable LOS, and the project would not cause LOS to fall below acceptable levels or generate 30 per lane peak hour trips at intersections operating at LOS D. Therefore, project impacts to roadway level of service would be less than significant.

27.a(2) Safety and Design of Public Roads

Impacts (NI). The project does not involve construction of a public road; therefore, no impacts to the safety and design of public roads would occur.

27.a(3) Safety and Design of Private Access

Impacts (NI). The project does not involve construction of a private road; therefore, no impacts to the safety and design of private access roads would occur. Any project-related damage to private roadways (Worth Way) would be repaired to pre-project conditions by the construction contractor.

27.a(4) Tactical Access

Setting. Tactical access describes an organized system of roads that provides access to and from a project site in the event of any emergency or disaster. The project may have a significant impact with respect to tactical access if it would involve the construction of a public or private road with single access that is over 800 feet in length.

Impacts (NI). The project site does not support any habitable structures requiring emergency access. Private driveways would not be affected by the project. Therefore, adequate emergency access to the site and adjacent land uses would be provided.

Part 27.b Pedestrian/Bicycle Facilities

Setting. In the project area, Upland Road is provided with bike lanes along the roadway shoulder (Class II facility).

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts to pedestrian/bicycle facilities include:

1. A project that would cause actual or potential barriers to existing or planned pedestrian/bicycle facilities.
2. Projects that generate or attract pedestrian/bicycle traffic volumes meeting requirements to provide protected highway crossings or pedestrian and bicycle facilities (pedestrian overcrossings, traffic signals, and bikeways).

Impacts (NI). The proposed project would not adversely affect the use of Upland Road or any designated bikeways by bicyclists and pedestrians.

Part 27.c Bus Transit

Setting. Bus service in the project area is provided along U.S Highway 101, State Route 118, State Route 34, and the western portion of Upland Road (between State Route 34 and Woodcreek Road).

Significance Thresholds. A project may have a significant impact if it would substantially interfere with existing bus transit facilities or routes or create a substantial demand for bus transit facilities or services.

Impacts (NI). The project would not involve the construction of housing, provide long-term employment opportunities or otherwise increase the population in the area. Therefore, the project would not result in an increase in demand for bus transit services, or adversely affect bus transit facilities. Project-related tank removal and new tank construction activities would not hamper access to bus stops or bus service.

Part 27.d Railroads

Setting. The nearest tracks (Union Pacific Railroad/Metrolink) are located approximately 0.8 miles north of the project site.

Significance Thresholds. A project would normally have a significant impact on a railroad if it would substantially interfere with an existing railroad's facilities or operations.

Impacts (NI). The proposed project would not generate rail traffic or interfere with railroad operations. No impacts to railroads would occur.

Part 27.e Airports

Setting. The project site is located approximately 6.0 miles northeast of the Camarillo Airport, and outside the Airport's sphere of influence.

Significance Thresholds. Incompatible uses (such as tall buildings, residential units, refineries, churches and schools) within the airport sphere of interest may cause a significant impact. Generally, projects with the potential to generate complaints and concerns, or which are within the sphere of influence of a County-operated airport, would interfere with the County's mission and be deemed as having a significant project-specific and/or cumulative impact.

Impacts (NI). The project site is not located within the airport sphere of interest or height restriction zone. Therefore, the proposed project would not conflict with airport operations, or adversely affect airport facilities.

Part 27.f Harbor Facilities

Setting. The nearest harbor is in Port Hueneme, located approximately 15.0 miles to the southwest.

Significance Thresholds. The significance of impacts to harbors is determined by the harbor operator, which is the Oxnard Harbor District for the Port Hueneme harbor.

Impacts (NI). The project would not increase harbor traffic, or adversely affect harbor facilities.

Part 27.g Pipelines

Setting. Pipelines in proximity to the project site include water supply and irrigation distribution pipelines. A standard utility investigation (i.e., Digalert, utility company contact) would be conducted to identify any pipelines within construction work areas.

Significance Thresholds. A project would have a significant impact if it would substantially interfere with, compromise the pipeline integrity or otherwise affect the operations of an existing pipeline.

Impacts (NI). The project would not interfere with the operation of existing pipelines.

ISSUE 28: WATER SUPPLY

Setting. The potable water needs of the project vicinity are served by local groundwater and imported water provided by the Ventura County Waterworks District No. 19. Residential areas south of the project site are served by the Camrosa Water District.

Part 28.a Quality

Setting. Domestic water is defined by the County of Ventura ISAG as a supply of potable water used for human consumption or connected to domestic plumbing fixtures in which the supply is obtained from an approved individual water supply system or a public water system operating with an unrevoked permit from the Ventura County Environmental Health Division or the California State Water Resources Control Board, Division of Drinking Water.

Significance Thresholds. The project would have a significant impact if it would result in the use of domestic water that does not meet applicable State Drinking Water Standards as described in Title 22 of the California Code of Regulations, as well the Ventura County Building Code and Ordinance Code.

Impacts (NI). The proposed project would utilize water during demolition and construction activities provided by the Ventura County Waterworks District No. 19 that meets all applicable water quality standards. Therefore, no impacts to domestic water quality would result.

Part 28.b Quantity

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts to water supply include:

1. Projects without a demonstrated permanent supply of water.
2. Any project that is inconsistent with any County policies or development standards relating to water supply.
3. Either individually or cumulatively when combined with recently approved, current, and reasonably foreseeable probable future projects would introduce physical development that would adversely affect the water supply of the hydrologic unit in which the project site is located.

Impacts (NI). The proposed project would serve to increase the capacity of existing water storage on the project site and would not consume water. However, the proposed project would use small amounts of water on a temporary basis for dust control and compaction during demolition and construction activities.

Part 28.c Fire Flow

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts to fire water flow include:

1. Projects that cannot meet the required fire flow.
2. Served by a private water system that cannot meet flow, duration or reliability requirements of the Ventura County Waterworks Manual and VCFPD Code.

Impacts (NI). The project would not require fire protection or a source of fire water. As such, no impacts with respect to fire flow are expected.

ISSUE 29: WASTE TREATMENT AND DISPOSAL FACILITIES

Part 29.a Individual Sewage Disposal Systems

The project would not involve the use of any individual septic systems and would have no impacts in this respect.

Part 29.b Sewage Collection/Treatment Facilities

Setting. The project site does not generate sewage. Domestic wastewater produced by surrounding residences are treated by individual private septic systems.

Significance Thresholds. The project would have a significant impact if it would individually or cumulatively generate sewage effluent which would be discharged to and exceed the capacity of an existing sewer main or sewage treatment plant. If the project description includes improvements to existing, or construction of new sewer mains and/or sewage treatment plants which would then be capable of serving the project and other cumulative development, there would be a less than significant impact.

Impacts (NI). The proposed project would not contribute wastewater to any wastewater treatment or disposal facilities.

Part 29.c Solid Waste Management

Setting. Solid waste generated in the project area is disposed at the Toland Road Landfill by E.J. Harrison & Sons, with recyclables transported to the Gold Coast Transfer Station for sorting and recovery.

Significance Thresholds. Any project that generates solid waste would have an impact on the demand for solid waste disposal capacity in Ventura County. However, unless the County has reason to believe that there is less than 15 years of disposal capacity available for County disposal, no individual project would have a significant impact on the demand for solid waste capacity.

The Countywide Siting Element approved by the California Integrated Waste Management Board on June 20, 2001 demonstrates that the approval of extension of the existing Solid Waste Facility Permit for the Simi Valley Landfill and Recycling Center, combined with the existing permitted capacity of the Toland Road Landfill would provide Ventura County with sufficient disposal capacity beyond the 15-year planning period mandated by State law. Therefore, no individual project would have a significant impact on the demand for solid waste capacity.

Impacts (LS). The proposed project would generate solid waste associated with disposal of the existing tank following demolition, primarily metal. The project would comply with the requirements of the Ventura County Public Works Integrated Waste Management Division, including recycling demolition debris, using recyclable construction materials, segregation of green-waste, and recycling and reusing soil and green-waste. Solid waste impacts would be less than significant.

Part 29.d Solid Waste Facilities

Setting. Solid waste generated in the project area is disposed at the Toland Road Landfill.

Significance Thresholds. Solid waste facilities shall be in compliance with the following statutes and regulations and are subject to enforcement by the Ventura County Environmental Health Division, the Local Enforcement Agency:

- California Health and Safety Code, Parts 13 and 14.
- California Code of Regulations, Title 14.
- California Code of Regulations, Title 27.

- California Public Resources Code, Division 30.
- Ventura County Ordinance Code.

Impacts (NI). The proposed project does not involve a solid waste operation or facility and would not have an impact on solid waste facilities within the region.

ISSUE 30: UTILITIES

Energy: Impacts (LS). The proposed project would consume non-renewable energy in the form of fuels for vehicles and equipment used to conduct tank demolition and construction activities. This energy use would not be wasteful, inefficient or unnecessary.

Electricity: Impacts (NI). The project site is currently provided with electricity service, and no new service would be required to serve the proposed project. Therefore, no impacts to electricity service would result.

Natural Gas: Impacts (NI). The project site is not currently provided with natural gas service, and the proposed project would not require natural gas service. Therefore, no impacts to natural gas service would result.

Communications: Impacts (NI). The project site is not currently provided with communications service, and proposed tank demolition and construction activities would not require communications service. Therefore, no impacts to communications service would result.

ISSUE 31: FLOOD CONTROL FACILITIES/WATERCOURSES

Part 31.a Watershed Protection District Facilities/Watercourses

Setting. The nearest Watershed Protection District facility to the project site is Arroyo Las Posas located approximately 2,600 feet to the north.

Significance Thresholds. Significance thresholds are taken from the Ventura County ISAG. Potentially significant project impacts to County-maintained water courses include:

1. Reducing the capacity of flood control facilities and watercourses, including planting of vegetation within the watercourse or on the banks thereof.
2. 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.
3. Deposition of any material of any kind in a watercourse.
4. Placement of a structure that encroaches on a flood control facility or that does not have sufficient setback from a watercourse.

Impacts (NI). The proposed project does not involve the placement of any materials or structures within the floodway or floodplain and would have no impact on the capacity of Arroyo Las Posas or any other adverse effect.

Part 31.b Other Facilities/Watercourses

Setting. There are no other flood control facilities or watercourses in proximity to the project site.

Significance Thresholds. The project would have a significant impact if it would substantially change the flow rate (i.e., increased runoff), velocity, erosion potential, or capacity of flood control channels. In reviewing a project for impacts, the following are to be given consideration:

- Deposition of sediment and debris materials within existing channels and allied obstruction of flow.
- Capacity of the channel and the potential for overflow during design storm conditions.
- Increased runoff and the effects on areas of special flood hazard and regulatory channels both on and off site.

Impacts (NI). The proposed project would have no effect on other flood control facilities or watercourses.

ISSUE 32: LAW ENFORCEMENT/EMERGENCY SERVICES

Setting. The project area is served by the Ventura County Sheriff Department's Camarillo Station at 3701 East Las Posas Road, located approximately 5.1 road miles from the project site. Emergency (paramedic) services would be provided from Ventura County Fire Department Station 52, located approximately 3.5 road miles from of the project site.

Significance Thresholds. Projects that do not include adequate measures to address increased demand for law enforcement or emergency services would have a potentially significant project-specific and cumulative impact.

Impacts (NI). The proposed project does not involve any habitable structures or other facilities requiring law enforcement or emergency services.

ISSUE 33: FIRE PROTECTION SERVICES

Part 33.a Distance and Response

Setting. Fire protection services would be provided from Ventura County Fire Department Station 52, located approximately 3.5 road miles from the project site (via Worth Way).

Significance Thresholds. Projects located greater than five miles (measured from the apron of the fire station to the structure or pad of the proposed structure) from a full-time paid fire department is considered a significant impact.

Impacts (NI). The proposed project does not involve any habitable structures or other facilities requiring fire protection services.

Part 33.b Personnel, Equipment and Facilities

Impacts (NI). Additional Ventura County Fire Department personnel, equipment or facilities would not be needed to serve the proposed project.

ISSUE 34: EDUCATION

Part 34.a Schools

Setting. The term “schools” includes public elementary, secondary and college level educational facilities. This issue entails the direct impact to, and demand for school facilities. Schools in the project area include Somis Elementary, Dos Caminos Elementary, Las Colinas Middle School and St. John’s Seminary College. The nearest school is Somis Elementary, located approximately 1.2 miles west of the project site.

Significance Threshold. A project will normally have a significant impact on school facilities if it would substantially interfere with the operations of an existing school facility.

Impacts (NI). The proposed project is non-residential and would not provide any long-term employment opportunities, or otherwise create any demand for schools. The proposed project would not interfere with the operations of any school.

Part 34.b Public Libraries

Setting. The term “public libraries” includes public library facilities and services. This issue entails the direct impact to, and demand for, public library facilities and services. The nearest public library is the Camarillo City Library, located approximately 2.3 miles west-southwest of the project site.

Significance Threshold. A project has 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, 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. A project has a cumulative impact on public library facilities and services if the project, in combination with other approved projects in its vicinity, would cause a public library facility to become overcrowded.

Impacts (NI). The proposed project is non-residential and would not provide any long-term employment opportunities, or otherwise create any demand for public libraries or services. The proposed project would not interfere with the operations of any public library.

ISSUE 35: RECREATION FACILITIES

Local Parks/Facilities

Setting. The nearest local park in the area is Quito Park in the City of Camarillo, located approximately 1.0 miles south-southeast of the project site.

Significance Thresholds. A project would have a significant impact on recreation if it would cause an increase in the demand for recreation when measured against the following standards:

- Local Parks/ Facilities: 5 acres of developable land (less than 15% slope) per 1000 population.
- Regional Parks/Facilities: 5 acres of developable land per 1000 population.
- Regional Trails/Corridors: 2.5 miles per 1000 population.

A project would have a significant impact on recreation if it would impede future development of Recreation Parks/Facilities and/or Regional Trails/Corridors.

Impacts (NI). The proposed project is not a new or expanded development and would not create a demand for recreational facilities or affect access or future development of existing facilities. Therefore, the project would not impact local parks/facilities.

Regional Parks/Facilities

Setting. A regional park is defined as an extent of land that, by its unique, natural character or unusual or extensive development, offers recreation opportunities that attract patronage from beyond the local vicinity without regard to physical, political, or municipal boundaries. The nearest regional park in the project area is the City of Camarillo's Sports Park at Village at the Park, located approximately 3.6 miles southwest of the project site.

Impacts (NI). The proposed project would not create a demand for recreational facilities and would not impede the use of any park. Therefore, no impacts to regional parks would occur.

Regional Trails/Corridors

Setting. Regional trails are intended to accommodate non-motorized recreational travel through areas removed from vehicular traffic. Regional trails/corridors should link major park and recreation facilities. Regional trails in the project area include those in Wildwood Park and Conejo Canyons Open Space, located at least 2.2 miles southeast of the project site.

Impacts (NI). The proposed project would generate any demand for regional trails and would not adversely affect any trails.

5.0 CONSISTENCY WITH THE VENTURA COUNTY 2040 GENERAL PLAN

Section 15063(d) of the State CEQA Guidelines requires a discussion of the consistency of the proposed project with existing zoning, plans and other applicable land use controls. Table 7 provides a discussion of project consistency with the policies of the Ventura County 2040 General Plan Policy Document.

**Table 7. Summary of Project Consistency with Policies
of the Ventura County 2040 General Plan**

Policy Area	Consistency Determination
Land Use and Community Character Element	Consistent: the proposed project would not result in any change in land use and is consistent with existing zoning.
Housing Element	Consistent: the proposed project does not include any housing and would not generate any demand for new housing.
Circulation, Transportation and Mobility Element	Consistent: the proposed project would not generate any new vehicle trips (excluding construction) or demand for transit, or other local or regional multi-modal mobility resources.
Public Facilities, Services and Infrastructure Element	Consistent: the proposed project would not require any new public facilities or services, new infrastructure, wastewater treatment or disposal facilities, flood control facilities, new public utilities, library, parks or recreational facilities, law enforcement or fire protection services. The proposed project would be consistent with solid and hazardous waste policies (PFS-5.1 through 5.9) because it would not result in any long-term waste generation and solid waste generated by tank demolition would be recycled to the extent feasible.
Conservation and Open Space Element	Consistent: the proposed project would not adversely affect biological resources, coastal resources, soil or mineral resources, oil and gas resources, or open space areas. The proposed project would be consistent with scenic resource policies (COS-3.1 through 3.6) because it would not alter the visual character of the nearby scenic highway (State Route 118). The proposed project would be consistent with cultural resource policies (COS-4.1 through 4.8) because it would not adversely affect any known cultural resources and includes mitigation measures to avoid any discovered resources. The proposed project would be consistent with climate change policies (COS-10.1 through 10.4) because it is consistent with the Climate Action Plan and would not hinder achievement of GHG emissions reduction goals.
Hazards and Safety Element	Consistent: the proposed project would not increase existing wildfire hazards, flood hazards, coastal flooding, geologic and seismic hazards, hazardous materials impacts, transportation-related hazards, oil and gas production and transportation incidents, military compatibility conflicts, temperature increases, or affect emergency response. The proposed project would be consistent with noise policies (HAZ-9.1 through 9.8) because construction-related noise would not exceed noise compatibility standards and project operation would not generate noise (excluding monthly emergency generator testing). The proposed project would be consistent with air quality policies (HAZ-10.1 through 10.15) because air pollutant emissions would be temporary, the project is consistent with the AQMP and APCD rules, and air quality impacts were assessed using the APCD's Air Quality Assessment Guidelines.

Policy Area	Consistency Determination
Agriculture Element	Consistent: the proposed project would not result in any loss of agricultural land or conflict with adjacent agricultural operations, and would not affect agricultural land preservation, agricultural and urban area compatibility, innovative specialty agriculture, food security, sustainable farming and ranching or agricultural resilience.
Water Resources Element	Consistent: the proposed project would serve an approved residential development and provide additional water storage for existing Waterworks District no. 19 customers. Existing water supplies are adequate for this purpose and the proposed project would not conflict with the Groundwater Sustainability Plan for the Las Posas Valley Basin. Potential surface water quality impacts associated stormwater run-off during the construction period would be minimized through implementation of best management practices. The proposed project would not affect water conservation and reuse, watershed management, water for agriculture (existing agricultural customers would benefit from increased water storage) or water for the environment.
Economic Vitality Element	Consistent: the proposed project would not affect business and employment, diversification of the economy, economic foundations or labor force development.

6.0 CUMULATIVE IMPACTS

Cumulative impacts are defined as two or more individual effects which, when considered together are considerable, or which compound or increase other environmental impacts. Under Section 15064 of the State CEQA Guidelines, the lead agency must identify cumulative impacts, determine their significance and determine if the effects of the project are cumulatively considerable.

6.1 CUMULATIVE PROJECTS DESCRIPTION

The following provides a list of other planned or recently approved projects in adjacent areas of Ventura County and the City of Camarillo that may contribute to cumulative environmental impacts.

6.1.1 Ventura County

Based on the March 2, 2022 list of pending and approved projects, the only project within about 5 miles under review or recently approved by the Resource Management Agency involving substantial physical changes to the environment is a lumber yard expansion near Somis including detention basin, wastewater treatment system and parking reconfiguration (under review).

6.1.2 City of Camarillo

Based on the City's Monthly Report for January 2022, the following projects involving substantial physical changes to the environment located in eastern Camarillo are under review or have been recently approved:

- 281-unit senior housing development at St. John's Seminary (under construction).
- 385-unit apartment complex at Camino Ruiz (approved).
- Eight-unit townhome project on Glenn Drive (approved).
- Three storage buildings totaling 116,364 square feet on Camino Carillo (under construction).
- Two light industrial buildings totaling 70,615 square feet on Camino Carillo (approved).
- 56,450 square foot light industrial building on Camino Carillo (approved).
- 88,185 square foot light industrial building on Camino Carillo (approved).
- 20,832 square foot light industrial building on Balboa Circle (approved).
- 23,602 square foot light industrial building on Balboa Circle (approved).
- 14,430 square foot light industrial building on Camino Carillo (approved).
- 31,249 square foot church on Santa Rosa Road (under construction).

6.2 CUMULATIVE IMPACT ANALYSIS

6.2.1 Air Quality

Each of the projects listed in Section 6.1 would generate short-term construction emissions. Proposed tank removal and tank construction activities would contribute to cumulative short-term construction emissions, should construction of these projects occur at the same time as the proposed project. However, construction emissions of both the proposed project and other projects would be mitigated by standard measures required by the Ventura County APCD. Implementation of these measures is considered to prevent significant project-specific and cumulative air quality impacts from construction. Therefore, the incremental contribution of the project to cumulative air quality impacts from construction is considered less than significant.

Each of the projects listed in Section 6.1 would generate motor vehicle emissions associated with operation, and some of the industrial projects may generate point source air pollutant emissions. The proposed project would generate only minimal long-term emissions (emergency generator testing) and would not contribute to cumulative long-term vehicle emissions. Overall, the incremental contribution of the project to cumulative air quality impacts would not be considerable.

6.2.2 Water Resources

Each of the projects listed in Section 6.1 would involve construction and may result in storm water run-off during the construction period, contributing to surface water quality impacts. The proposed project would be conducted during the dry season and is unlikely to contribute to storm water-related surface water quality impacts. In any case, most of these projects would be subject to the General Permit for Discharges of Storm Water Associated with Construction and Land Disturbance Activities and would implement a SWPPP.

The cumulative projects would be subject to the County's stormwater quality management program developed for the Ventura County Municipal Separate Storm Sewer System Permit (Order R4-2010-0108, NPDES Permit No. CAS004002). Implementation of the storm water pollution prevention plan and monitoring required under the General Permit, and compliance with the Storm Sewer System Permit would prevent significant impacts to surface water quality.

Most of the projects listed in Section 6.1 would require a permanent potable water supply for domestic uses. The proposed project would not require a permanent potable water supply and would not incrementally contribute to the water supply demand.

6.2.3 Biological Resources

Some of the cumulative projects listed above would result in the loss of native vegetation and wildlife habitat, and may significantly impact special-status species, sensitive ecological communities or wetlands. The proposed project would not contribute to any of these impacts; therefore, the project's incremental contribution to cumulative impacts to biological resources would not be considerable.

6.2.4 Cultural Resources

Cumulative projects listed in Section 6.1 may adversely affect intact and/or known archaeological resources. In addition, similar to the proposed project, isolated and/or unreported resources may be inadvertently discovered during construction-related ground disturbance. The proposed project may contribute to this cumulative impact; however, mitigation measures are provided to avoid and minimize potential impacts to discovered archaeological resources.

The cumulative projects may adversely affect historic resources. The proposed project would not contribute to such impacts.

6.2.5 Noise

Most of the projects listed in Section 6.1 may generate both short-term construction noise and long-term traffic noise. The proposed project would contribute to short-term cumulative noise impacts. However, the proposed project is not located in close proximity to other projects and would not have a considerable incremental contribution to impacts at noise sensitive receptors affected by these projects.

6.2.6 Traffic and Circulation

The St. John's Seminary senior housing project located near the project site is under construction but is anticipated to be completed at the time the proposed project is implemented. This senior housing project would contribute up to 168 peak hour trips traffic on Upland Road (Stantec, 2016). Due to the current high level of service (LOS A) at nearby intersections, cumulative traffic volumes would not result in Upland Road operating at unacceptable level of service (LOS D). Therefore, the project's contribution to traffic impacts would not be cumulatively considerable.

7.0 GROWTH INDUCEMENT

Projects have the potential to foster economic or population growth, which may cause indirect impacts associated with construction of housing and/or community service facilities (Section 15126.2(d) of the State CEQA Guidelines). A project would have a significant impact if it would induce substantial growth. A project would have the potential to induce substantial growth if it would eliminate or remove an impediment to growth in the area. This includes both physical impediments (lack of roads, flood control facilities, sewers, water lines, etc.) and policy impediments (e.g., existing land use and zoning designations, General Plan policies, etc.).

The proposed project would not provide long-term employment opportunities or housing and would not draw people to the area and increase population.

The proposed project (Tank 1) would provide potable water storage for an approved residential project (Somis Ranch Farmworker Housing Project) but would not provide water storage to support any future development and would not induce population growth. The area (Pressure Zone 538) served by the proposed Tank 2 would not change and would not support any growth or increased water usage. In addition, the project would not require the amendment of existing land use designations, zoning designations, General Plan policies, ordinances, development guidelines, or any other policies that would allow for increased development of the area.

The proposed project does not include residential units or commercial land uses that may generate substantial employment opportunities; therefore, it would not directly increase population levels, or create a demand for goods or services. Since the proposed project would not affect existing physical and/or policy impediments to growth, it would not induce population growth.

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APPENDIX A

INITIAL STUDY CHECKLIST

INITIAL STUDY CHECKLIST

The Initial Study Checklist was prepared following the format adopted by the County of Ventura (2011).

ISSUE	PROJECT IMPACT DEGREE OF EFFECT *				CUMULATIVE IMPACT DEGREE OF EFFECT*			
	<u>N</u>	<u>LS</u>	<u>PS-M</u>	<u>PS</u>	<u>N</u>	<u>LS</u>	<u>PS-M</u>	<u>PS</u>
RESOURCES: 1. <u>Air Quality:</u>								
a. Regional	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Local	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. <u>Water Resources:</u>								
a. Groundwater Quantity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Groundwater Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Surface Water Quantity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Surface Water Quality	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. <u>Mineral Resources:</u>								
a. Aggregate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Petroleum	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. <u>Biological Resources:</u>								
a. Species	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Ecological Communities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Waters and Wetlands	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Coastal Habitat	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Habitat Connectivity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. <u>Agricultural Resources:</u>								
a. Soils	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Land Use Incompatibility	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. <u>Scenic Resources:</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. <u>Paleontological Resources:</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. <u>Cultural Resources:</u>								
a. Archaeological	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Historical	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. <u>Coastal Beaches & Sand Dunes:</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<u>ISSUE</u>		<u>PROJECT IMPACT DEGREE OF EFFECT*</u>				<u>CUMULATIVE IMPACT DEGREE OF EFFECT*</u>			
		<u>N</u>	<u>LS</u>	<u>PS-M</u>	<u>PS</u>	<u>N</u>	<u>LS</u>	<u>PS-M</u>	<u>PS</u>
HAZARDS:	10. <u>Fault Rupture Hazard:</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	11. <u>Ground-shaking Hazard:</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	12. <u>Liquefaction Hazard:</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	13. <u>Seiche & Tsunami:</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	14. <u>Landslides/Mudflow Hazard:</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	15. <u>Expansive Soils Hazard:</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	16. <u>Subsidence Hazard:</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	17. <u>Hydraulic Hazards:</u>								
	a. Non-FEMA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b. FEMA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	18. <u>Fire Hazards:</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	19. <u>Aviation Hazards:</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	20. <u>Hazardous Materials/Waste:</u>								
	a. Hazardous Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b. Hazardous Waste	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	21. <u>Noise and Vibration:</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	22. <u>Daytime Glare:</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	23. <u>Public Health:</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	24. <u>Greenhouse Gases:</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
LAND USE:	25. <u>Community Character:</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	26. <u>Housing:</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PUBLIC FACILITIES:	27. <u>Transportation/Circulation</u>								
	a. Roads and Highways								
	(1) Level of Service	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	(2) Safety/Design of Public Roads	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	(3) Safety/Design of Private Access	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	(4) Tactical Access	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b. Pedestrian/Bicycle	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	c. Bus Transit	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	d. Railroads	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	e. Airports	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	f. Harbor Facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	g. Pipelines	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<u>ISSUE</u>		<u>PROJECT IMPACT DEGREE OF EFFECT *</u>				<u>CUMULATIVE IMPACT DEGREE OF EFFECT *</u>			
		<u>N</u>	<u>LS</u>	<u>PS-M</u>	<u>PS</u>	<u>N</u>	<u>LS</u>	<u>PS-M</u>	<u>PS</u>
PUBLIC FACILITIES:	28. <u>Water Supply</u>								
	a. Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b. Quantity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	c. Fire Flow	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	29. <u>Waste Treatment/Disposal</u>								
	a. Individual Sewage Disposal System	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b. Sewage Collection/Treatment Facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	c. Solid Waste Management	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	d. Solid Waste Facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	30. <u>Utilities</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	31. <u>Flood Control/Watercourses</u>								
	a. WPD Facilities/Watercourses	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b. Other Facilities/Watercourses	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	32. <u>Law Enforcement/Emergency Svs.</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	33. <u>Fire Protection</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	a. Distance/Response Time	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b. Personnel/Equipment/Facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	34. <u>Education</u>								
	a. Schools	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b. Libraries	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	35. <u>Recreation</u>								
	1. Local Parks/Facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. Regional Parks/Facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. Regional Trails/Corridors	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*Explanation: Degree of Effect

N = No Effect

LS = Less Than Significant Effect

PS-M = Potentially Significant Impact Unless Mitigation is Incorporated

PS = Potentially Significant Impact

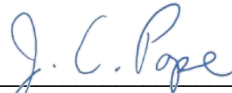
MANDATORY FINDINGS OF SIGNIFICANCE

	<u>Yes/Maybe</u>	<u>No</u>
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<u>X</u>	—
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term environmental goals? (A short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future).	—	<u>X</u>
3. Does the project have impacts which are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effect of other current projects, and the effect of probable future projects. (Several projects may have relatively small individual impacts on two or more resources, but the total of those impacts on the environment is significant).	—	<u>X</u>
4. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<u>X</u>	—

DETERMINATION OF ENVIRONMENTAL DOCUMENT

On the basis of this evaluation:

- ☐ I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION should be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described in Section 5.0 of the Initial Study will be applied to the project. A MITIGATED NEGATIVE DECLARATION should be prepared.
- ☐ I find that the proposed project, individually or cumulatively, MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required*.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been adequately addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Ventura County Public Works Water and Sanitation Director

6/06/2022

Date

APPENDIX B

PUBLIC COMMENTS AND RESPONSES

APPENDIX B
COMMENTS RECEIVED ON THE DRAFT
MITIGATED NEGATIVE DECLARATION

<u>Party</u>	<u>Date</u>
1. Pachowicz/Goldring Law Corporation	June 24, 2022
2. Ventura County Air Pollution Control District	July 13, 2022

PACHOWICZ | GOLDENRING

A Professional Law Corporation

Mailing Address:
6050 Seahawk Street, Ventura, CA 93003-6622

T: 805.642.6702
F: 805.642.3145

June 24, 2022

Via Mail and Email: ryan.lippincott@ventura.org
Ryan Lippincott, Project Manager
County of Ventura Public Works Department, Water and Sanitation
6767 Spring Road
Post Office Box 250
Moorpark, California 93020

Re: Draft Mitigated Negative Declaration for Pressure Zone 538 Reservoir
Replacement Project
Project No. 2202-0851

Dear Mr. Lippincott:

1. Please be advised that this office represents Placco, L.L.C. Placco L.L.C. is the underlying property owner in regard to the above referenced project. Prior to an email from Mr. Joe Pope on June 20, 2022 the County of Ventura and none of its department ever communicated to our client the existence of this proposed project, its scope or impact on our client's property. This lack of communication in fact what appears to be an affirmative hiding of the project from our client took place in the context of a number of communications between this office and the County of Ventura, specifically Mr. Pope, concerning matters that now in retrospect appear to be related to this underlying Project. Yet, throughout the entire process, Mr. Pope never disclosed the existence of this MND, nor the scope of the Project nor the impact on our client's property until I learned of this Project from a source other than Mr. Pope, made an inquiry and then on June 20, 2022, Mr. Pope then finally provided the link and disclosed the documents.

2. We provide the above comments so that you and the public record are clear that we do not believe the public noticing requirements, and the notice requirements to property owners directly affected by this project have been satisfied. In fact, it appears to us that the County of Ventura has purposely sought to hide this project, its existence and its scope, from interested parties to try and push through an MND that is otherwise fatally defective and deficient.

Our request is that the time period of response be extended and we be afforded an opportunity to obtain copies of underlying documents that form the basis of the MND so we can provide full and complete comments to this Project. Should the County of Ventura decline this request, the declination will constitute a violation of our client's rights and a violation of the

Camarillo Location:

4055 Mission Oaks Blvd., Suite A
Camarillo, CA 93012

T: 805.987.4975
F: 805.987.4980



Mr. Ryan Lippincott, Project Manager

Re: Draft Mitigated Negative Declaration for Pressure Zone 538 Reservoir
Replacement Project

Project No. 2202-0851

June 24, 2022

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applicable laws, rules and regulations governing this process. As a preliminary matter, based upon our review of the MND, it appears that the following fundamental flaws exist:

3. 1. The Project is located on our client's property. The easements do not support the project and to the extent there are easements that do exist, the County has lost various aspects of those easements under the law of prescriptive easement in favor of our client.
4. 2. On several occasions, the County of Ventura, has entered the blue line adjacent water channel, performed work and various activities including changing and altering that channel. My inquiries have confirmed that the scope clearly included entry into the channel and changes associated therewith, yet the County has confirmed that it has never obtained nor sought any permits from any regulatory agency governing the channel including, without limitation, the State of California Fish and Game, CalEPA and associated federal entities.
5. 3. The current configuration of the Project and what is contemplated appear to indicate that water will flow into the blue line channel. There does not appear to be any analysis or consideration thereof, nor any permits being obtained. The fact that this has occurred in the past can be documented. Further, to the extent the County seeks to avoid this by saying it will cause water to flow onto our client's property, the MND fails to address this issue. Further, there is no legal basis for this, and it would constitute a violation of our client's rights. In past when this has occurred, damages have accrued to our client's property and the road. This will not be tolerated in the future. The past misconduct will not be ignored, it is not disclosed in the MND, and the MND seems to assume that the future will be no different. This is a wholesale misrepresentation of the Project and its impact on surrounding property. The Project as described in the MND is fatally defective and misrepresents both the truth of what has occurred and what will continue to occur. The MND also fails to address storm water mitigation with regard to the channel, a channel that the County has altered without permits, which is necessary to be addressed.
6. 4. In the past, through its activities in the blue line channel which have changed the channel, and by working in the channel and on its slopes, the County has created alterations which have failed, and which as currently configured will likely fail again. This all ties back to the County pipes which are within the channel, to our understanding without permits, and this work has not been permitted nor performed properly. Preliminary investigation indicates that going into the blue line channel and doing the work performed that the County has over the several cycles may constitute a violation of both State and Federal law and regulation. Neither does the MND describe in detail nor with sufficient detail to analyze that there is even a modicum of compliance

Mr. Ryan Lippincott, Project Manager

Re: Draft Mitigated Negative Declaration for Pressure Zone 538 Reservoir
Replacement Project
Project No. 2202-0851

June 24, 2022

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6. with applicable rules and regulations. The Project description fails to address the storm drain system, storm water mitigation, what has occurred in the past, and how the future will be any different, because we know the past has been violative of the law.

7. 5. The MND speaks to a construction staging area and seems to suggest that the construction will occur within the easement area, but that materials may be staged along the existing access road and adjacent areas. That shocking statement is contrary to the law and the facts on the ground. The existing easement is insufficient for the construction as analyzed. 7. There is no authority for staging, offloading or use "along the existing access road and adjacent areas" and any such occurrences would be contrary to the express entitlements and rights of our client and constitute inverse condemnation. Neither does the MND even credibly analyze the impact of the Project on the road, our client's property and the deficiencies relative to the ability to even perform the Project as described without violating our client's property and legal rights, which are not mentioned or addressed in the MND.

8. 6. The MND is silent with respect to earthquake risk, faults and other geological impacts at the proposed site. It does seem to acknowledge that the Project is located within a landslide area and certainly it is located within the mud and water flow of the adjacent blue line creek, especially given the alteration of the blue line channel by the County without permits. Our investigation has confirmed that this whole area is subject to liquefaction, landslide and flooding. None of this is adequately addressed in the MND.

9. 7. The Project fails to address what occurs if either of the two tanks fail, its impact on the adjacent blue line channel and on our client's property.

10. These are only our preliminary concerns based upon the limited time we have had to review the previously hidden documents. In furtherance of the above referenced, and since the County hired the drafter of the MND for the benefit of the County and thus there is little confidence as to any arms length evaluation process or analysis, pursuant to the California Public Records Acts, we request the following:

1. All billings and time records by Padre Associates, Inc. with respect to Project No. 2202-0851. Since they are the County's consultant, the County is obligated to obtain and provide those records.

2. All communications between the County and Padre Associates, Inc. with respect to Project No. 2202-0851, including ESI, as that term is defined in the California Evidence Code.

Mr. Ryan Lippincott, Project Manager

Re: Draft Mitigated Negative Declaration for Pressure Zone 538 Reservoir
Replacement Project
Project No. 2202-0851

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Page 4

3. All drafts of the Mitigated Negative Declaration and any changes thereto, including redline or other comments by and between the County of Ventura and Padre Associates, Inc.

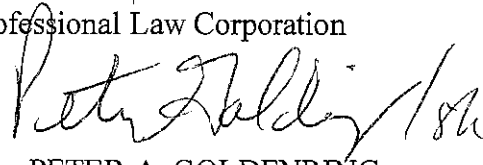
While the Public Records Act grants the responding public agency 10 days to provide this information, we hope it will happen faster in light of the any upcoming analysis or presentation to the Board of Supervisors.

Please also ensure that this office, on behalf of our client, receives copies of all communications, staff reports and advisement of agendizing of this matter before any agency governing body, including the Board of Supervisors.

Nothing herein shall be deemed to limit, modify, or alter our client's legal rights, all of which are reserved whether enumerated herein or not.

Very truly yours,

PACHOWICZ | GOLDENRING
A Professional Law Corporation

A handwritten signature in black ink, appearing to read "Peter A. Goldenring", is written over the printed name.

By: PETER A. GOLDENRING

PAG/sah

Commenter: Peter Goldenring, Pachowicz/Goldring Law Corporation

Date: June 24, 2022

Response:

1. The project plans were provided to your client (Mr. Petersen of Placco LLC) by the Water and Sanitation Department Director (Joseph Pope) on April 29, 2022. Placco LLC was sent a Notice of Intent to Adopt the Draft MND on June 14, 2022.
2. The Water and Sanitation Department sent a Notice of Intent to Adopt the Draft MND to the Placco LLC's mailing address, posted the MND to the State Clearinghouse, and ran a legal notice in the local newspaper. The Notice of Intent included the project manager's contact information to allow Placco LLC the opportunity to acquire and review the Draft MND. There are no extenuating circumstances or significant environmental issues identified in your comments which would necessitate the extension of the comment period.
3. This comment does not address the adequacy of the MND; therefore, a response is not required. This issue was addressed outside the scope of MND by a letter from Joseph Pope.
4. The proposed project does not include any components or work in drainage channels. This comment does not address the adequacy of the MND; therefore, a response is not required. This issue was addressed outside the scope of MND by a letter from Joseph Pope.
5. This comment focuses on past operational upsets of the existing reservoir. When a Water and Sanitation Department tank overflows, it is typically only in an emergency. They do not overflow as a part of normal operation. In 2015, automatic tank level controls were installed to prevent overflowing of the Water and Sanitation Department's tank on your client's property. If the automatic controls fail, the back-up altitude valve would turn off the flow of water into the tank. In the rare event that the tank filling controls fail and an overflow of water damages the road, the Water and Sanitation Department will make the requisite road repairs. The proposed new tanks will also be designed with automatic level controls (including a supervisory control and data acquisition system) and have a redundant hydraulic altitude valve to prevent overflow.
6. The proposed project does not include any components or work in drainage channels. The storm drain system proposed to serve the tank site was described in Section 2.2 of the Draft MND, and any impacts related to storm water were addressed in the text of the Draft MND. The proposed project would be subject to the County's Storm Sewer System Permit.

7. As stated on page 6 of the Draft MND, staging of equipment and materials would occur within the existing easement. However, materials offloading may also occur along the existing access road and adjacent areas. Along with the tank easement, the Water and Sanitation also has a 27-foot-wide easement over your client's property which can also be used for staging. This comment focuses on the legal standing of the easements and not the adequacy of the MND; therefore, a response is not required.
8. The Draft MND adequately addressed earthquake risk (see fault rupture and ground-shaking on pages 37 and 38), landslide/mudflow hazard (see page 39), liquefaction (see page 38) and flooding (see pages 41 and 58). The project has been designed in compliance with the recommendations of a project-specific geotechnical study. Therefore, significant impacts were not identified.
9. The project consists of replacement of an aging tank with two new tanks with state-of-the-art control systems. Therefore, the potential for tank failure and indirect impacts to adjacent drainages has been drastically reduced.
10. As stated in the above response to your comments, Placco LLC has been given the opportunity to review and comment on the Draft MND as required by law and was provided project plans for review months in advance of the release of the MND. Therefore, there are no "hidden documents". The public records act request does not address the adequacy of the MND; therefore, a response is not required.



AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Ryan Lippincott, Engineering Manager, VCPWA

DATE: July 13, 2022

FROM: Nicole Collazo, Air Quality Specialist, VCAPCD Planning Division

A handwritten signature in black ink, appearing to read 'NC', with a horizontal line extending to the right.

SUBJECT: Review of 538 Reservoir Replacement Project IS-MND

Air Pollution Control District (APCD) staff has reviewed the draft Initial Study and Mitigated Negative Declaration (MND), which analyzed the potential environmental impacts of a construction project to replace an existing potable water 210,000 gal tank with 2- 300,000 gal water tanks. The project is located in unincorporated Ventura County near the community of Somis, approximately 1.25 miles southeast of the State Route 118/State Route 34 intersection. The Lead Agency is the Ventura County Public Works Agency- Engineering Services Department.

APCD thanks the Ventura County Public Works Agency for addressing comment numbers 1, 2, and 3 from our comment letter dated May 13, 2022. APCD has the following remaining comments regarding the project's MND.

- 1) Although the phone numbers were updated in the MND Air Quality section, the old phone numbers still remain in the Mitigation Monitoring Program - Implementation Table (12th item down). Please also update the phone numbers in the table to ensure compliance with APCD nuisance-driven rules.
- 2) Due to the largest reduction in ozone precursor emissions resulting from the use of Tier 3 or Tier 4 off-road construction equipment, we recommend having this mitigation measure specifically as a condition of approval for the project's discretionary permit, if any, or grading permit, if applicable. This would ensure this measure is enforceable and in compliance with the County's General Plan Policy HAZ 10.13.
- 3) As commented during our first comment letter, it would be helpful to the public and those reviewing agencies, such as APCD, and for the purposes of full disclosure in CEQA to attach any emissions modeling reporting done for the project's operational and construction emissions to the DMND as part of its appendices. We could not conduct a thorough review of the methodology and assumptions used in CalEEMod air emissions model because it was not attached to the MND submitted. We also could not find the webpage for this project and its environmental documents online.

As also recommended prior, due to the lead agency's emission reduction measures that included the use of Tier 3 and Tier 4 off-road construction equipment, which can reduce NOx emissions by up to 85%, we also recommend quantifying the construction's emissions after Tier 3 equipment is applied to construction and disclosing it in the DMND. This is also to be consistent with the Ventura County Air Quality Assessment Guidelines, Sections 5.2, Calculating Ozone Precursor Emissions from Project Construction, and 7.4, Construction Mitigation.

A copy of our comment letter dated May 13, 2022 is found below.

Thank you for the opportunity to comment on the project. If you have any questions, you may contact me at nicole@vcapcd.org.



**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**
Memorandum

TO: Ryan Lippincott, Engineering Manager, VCPWA

DATE: May 13, 2022

FROM: Nicole Collazo, Air Quality Specialist, VCAPCD Planning Division

SUBJECT: Agency Request for Review of 538 Reservoir Replacement Project DIS-MND

Air Pollution Control District (APCD) staff has reviewed the draft Initial Study and Mitigated Negative Declaration (MND), which analyzed the potential environmental impacts of a construction project to replace an existing potable water 210,000 gal tank with 2- 300,000 gal water tanks. The project is located in unincorporated Ventura County near the community of Somis, approximately 1.25 miles southeast of the State Route 118/State Route 34 intersection. The Lead Agency is the Ventura County Public Works Agency- Engineering Services Department.

APCD has the following comments regarding the project's DMND.

- 1) Page 12. We recommend re-labeling Table 4 as Construction Peak Day Air Pollutant Emissions to avoid confusion with Peak Day Emissions estimated for significance determination of a project's operational air emissions.
- 2) Page 14. The APCD Complaint phone numbers have been recently changed to 805-303-3700 and 805-303-3708, respectively. Please update this contact information to ensure construction operations are in compliance with APCD's nuisance-driven rules.
- 3) The diesel-powered engine to the proposed generator will require an APCD Permit to Operate if it has a horse-power rating of 50 HP or greater. If so, the facility will need to obtain the proper permits, including an approved Authority to Construct *prior* to installation and construction of the generator. We recommend the facility contact APCD Engineering Division at 805-303-3683 as soon as possible to avoid any Notices of Violation for failure to obtain proper permits prior to construction and operation (APCD Rule 10, *Permits Required*). In addition, if the diesel engine will have a stationary source permit with APCD, those emissions should not be included in the significance determination for the project's operational emissions. A brief discussion is below.

The recently adopted Ventura County 2040 General Plan includes new policy HAZ-10.11 requiring the County to “*consider total emissions from both stationary and mobile sources, as required by the California Environmental Quality Act*” and to include APCD-permitted stationary source emissions in a CEQA air quality analysis of discretionary projects (i.e., CUP).

The County Planning Division implements this policy by requiring, during CEQA review, quantification and disclosure of the project's estimated ozone precursor emissions from both mobile sources and stationary sources (including emissions that are subject to APCD's permitting and regulatory program), and discussion of the APCD permit(s) and regulations that would apply to and address project emissions. In accordance with the AQAGs, the County considers APCD's permitting and regulatory program to constitute mitigation under CEQA for air quality impacts associated with APCD-permitted emissions (i.e., emissions from equipment or operations requiring APCD permits), and therefore, stationary emissions requiring an APCD permit, although disclosed for the purposes of CEQA, are not included in the significance determination (*Reference: County Board Letter August 6, 2019, Pages 21-22*).

4) It would be helpful to the public and for the purposes of CEQA to attach any emissions modeling reporting done for the project's operational and construction emissions to the DMND as part of its appendices. Due to the lead agency's emission reduction measures that included the use of Tier 3 and Tier 4 off-road construction equipment, which can reduce NOx emissions by up to 85%, we also recommend quantifying the construction's emissions after Tier 3 equipment is applied to construction and disclosing it in the DMND. This is also to be consistent with the Ventura County Air Quality Assessment Guidelines, Sections 5.2, Calculating Ozone Precursor Emissions from Project Construction, and 7.4, Construction Mitigation.

Thank you for the opportunity to comment on the project. If you have any questions, you may contact me at nicole@vcapcd.org.

Commenter: Nicole Collazo, Ventura County Air Pollution Control District

Date: July 13, 2022

Response:

1. The APCD's complaint telephone numbers have been updated in the mitigation monitoring program implementation table.
2. The use of construction equipment with engines certified to the Federal Emissions Standard Category of Tier 3 or Tier 4 was included as a mitigation measure. Since the Water and Sanitation Department is its own lead agency there are no conditions of approval.
3. Construction emissions were estimated using standard CARB models (OFFROAD 2021 and EMFAC 2021). Since quantitative emissions thresholds do not apply to construction emissions, a detailed review of emissions calculations is not needed. The Draft MND was mailed directly to the APCD. Other persons were instructed to contact the project manager in the Notice of Intent to obtain an electronic copy of the Draft MND. Since it is unknown what engines would be used in the construction equipment, quantification of the emissions reduction associated with use of Tier 3 or Tier engines is not possible. However, an estimate of the percent emissions reduction of using Tier 3 as compared to Tier 2 engines was provided in the Draft MND.