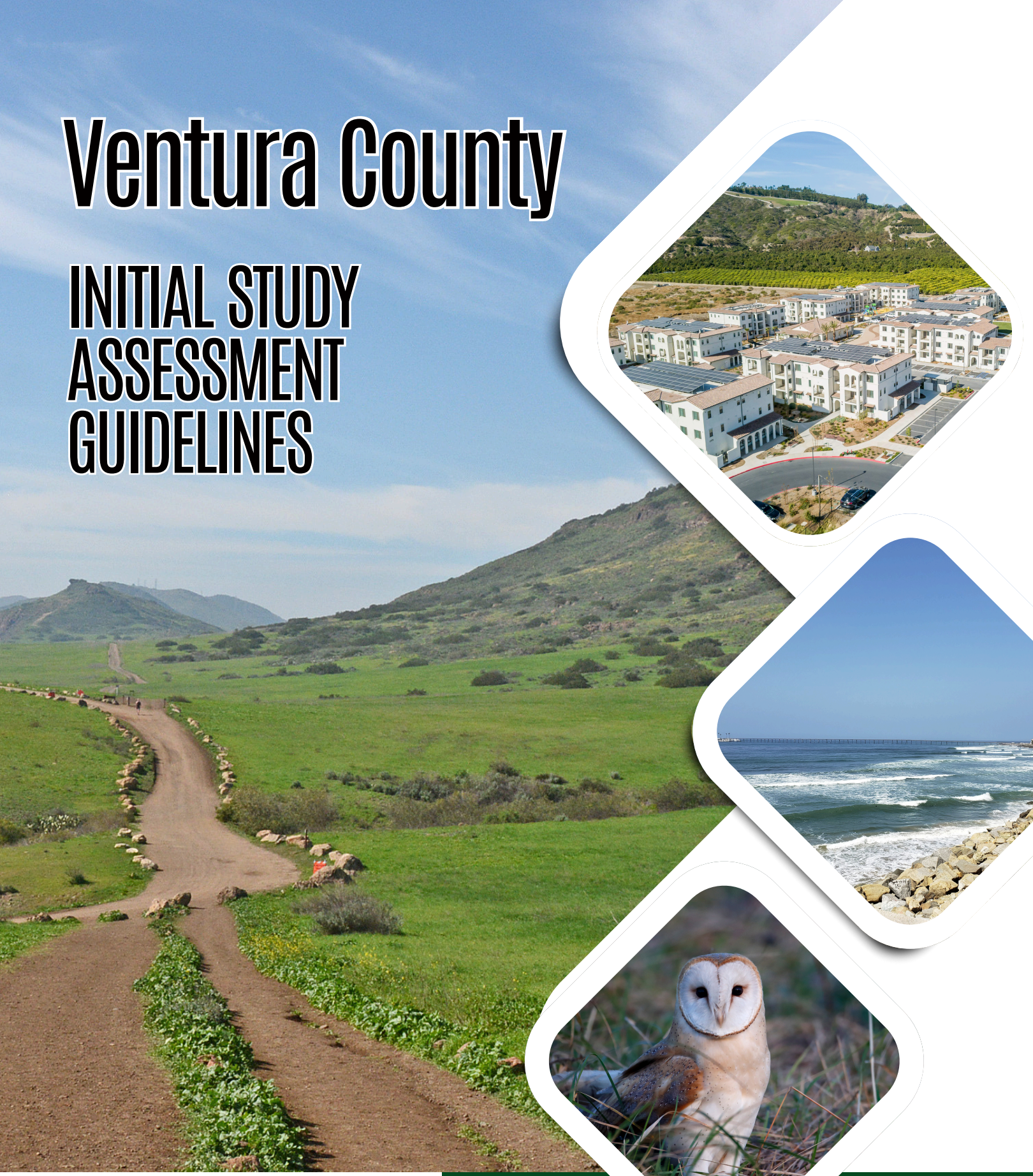
Ventura County

INITIAL STUDY ASSESSMENT GUIDELINES



COUNTY of VENTURA

Adopted by the Board of Supervisors [DATE]

Proposed Draft, April 2025

Cover Page Photos:

Wildwood Regional Park, County of Ventura

Somis Ranch Farmworker Housing, AMCAL Inc.

North County Coastline, County of Ventura

Barn Owl, County of Ventura

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PUBLIC FACILITIES/SERVICES

1. Introduction

1.1 BACKGROUND AND CONTEXT

The California Environmental Quality Act (CEQA) requires state and local government agencies to inform decision makers and the public about potential environmental impacts of proposed projects, and to avoid, reduce, or minimize those environmental impacts where *feasible*. CEQA is set forth in state law[1], and is incorporated by reference into the Ventura County CEQA Implementation Manual. The CEQA Implementation Manual identifies the specific procedures and provisions adopted by the County of Ventura to implement and comply with CEQA requirements.

The State CEQA Guidelines require each public agency to adopt objectives, criteria and specific procedures consistent with CEQA and the State CEQA Guidelines for administering its responsibilities under CEQA (see State CEQA Guidelines Section 15022). The Ventura County CEQA Implementation Manual and the Ventura County Initial Study Assessment Guidelines (ISAGs) are to be used in conjunction with the State CEQA Guidelines.

If a *Lead Agency* determines that a proposed activity is a project under CEQA, the *Lead Agency* must determine whether the project is exempt from CEQA (see Section 3.4 of the CEQA Implementation Manual). If a project is not exempt, the *Lead Agency* must prepare an Initial Study to determine whether the project may result in potentially significant environmental effects and prepare a new or identify a previously prepared environmental document for the project. An Initial Study is a preliminary analysis prepared by the *Lead Agency* to determine whether an environmental impact report (EIR), negative declaration (ND), or mitigated negative declaration (MND) is required for the project. While a sample format of an Initial Study is provided in Appendix G of the State CEQA Guidelines, agencies are free to devise their own format. The County of Ventura has developed an Initial Study Checklist and ISAGs that address environmental issues outlined in Appendix G as well as issues unique to Ventura County. The ISAGs provide a framework with unique threshold criteria by which to conduct an Initial Study and complete the Initial Study Checklist.

1.2 PURPOSE

The purpose of the ISAGs is to inform any interested stakeholder (e.g., the public, project applicants, consultants and County of Ventura staff) of the threshold criteria and standard assessment methodology used to determine whether a project (individually or cumulatively with past, present, and reasonably foreseeable probable future projects) could have a potentially significant effect on the environment pursuant to CEQA. Furthermore, the ISAGs provide guidelines for evaluating environmental issues, completing the Initial Study Checklist, and determining the type of environmental document for individual projects.

The ISAGs present a range of quantitative and qualitative threshold criteria for particular environmental issues. Normally, in the absence of *substantial evidence* to the contrary, an

[1] Section 21000 et seq. of the Public Resources Code; State CEQA Guidelines are set forth at Section 15000 et seq. of Title 14, Division 6, Chapter 3 of the California Code of Regulations.

affirmative response to any one threshold means the project would result in a potentially significant environmental effect, whereas effects that do not meet any of the thresholds will normally be determined to be "less than significant." The State CEQA Guidelines Section 15064(b)(1) states:

> "The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area."

The ISAGs assist in providing a consistent, objective and predictable evaluation of significant effects. The ISAGs are not binding on any decision-maker and should not be substituted for the use of independent judgment to determine significance or the evaluation of evidence in the record.

1.3 ISAGS READER'S GUIDE

The ISAGs document is made up of a collection of guidelines for assessing environmental issues that must be evaluated pursuant to CEQA and a glossary that contains all technical terms used frequently throughout the document. The following subsections describe these components within the ISAGs document. Federal, state, and local legislation or policies are referenced where applicable throughout the guidelines and discussions provided in the ISAGs. All federal, state, and local legislation or policy references in the ISAGs shall be applicable, as amended.

1.3.1 Environmental Issues

Each environmental issue is assigned to one or more specific County of Ventura agency/department on the basis of its professional subject matter expertise. Note that the Ventura County Air Pollution Control District is a separate entity, independent of the County of Ventura, whose authority is established by Division 26 of the California Health and Safety Code. The environmental issues and their assigned agencies/departments are summarized in Table 1-1. Each assigned agency/department shall assist the *Lead Agency* in the preparation of the Initial Study Checklist for its assigned environmental issue(s). Where one or more agency/department is assigned, the *Lead Agency* and assigned agencies/departments shall ensure there is consensus across all assigned agencies/departments on the evaluation and determination made for the environmental issue. Note that the Ventura County Air Pollution Control District is a separate entity, independent of the County of Ventura, whose authority is established by Division 26 of the California Health and Safety Code.

Table 1-1. Assigned Agencies/Departments for Environmental Issues

Environmental Issue / ISAG Section	County Agency/Department											
	Agriculture/Weights & Measures	County Executive Office Sustainability Division	Department of Airports	Fire Protection District	General Services Agency	Library Services	Public Works Agency	Watershed Protection District	RMA Environmental Health Division	RMA Planning Division	Sheriffs Office	Ventura County Air Pollution Control District
1. Introduction												
2. Agriculture & Forestry	●											
3. Air Quality												●
4. Greenhouse Gases												●
5. Energy		●										
6. Biological Resources										●		
7. Hydrology							●	●				
8. Beaches and Coastal Sand Dunes										●		
9. Water Resources							●					
10. Paleontological Resources										●		
11. Mineral Resources										●		
12. Aesthetics										●		
13. Historical Resources										●		
14. Archaeological Resources										●		
15. Tribal Cultural Resources										●		
16. Land Use & Planning			●							●		
17. Population & Housing										●		
18. Recreation					●							
19. Aviation Hazards			●									
20. Noise & Vibration										●		
21. Geological Hazards							●					

Environmental Issue / ISAG Section	County Agency/Department											
	Agriculture/Weights & Measures	County Executive Office Sustainability Division	Department of Airports	Fire Protection District	General Services Agency	Library Services	Public Works Agency	Watershed Protection District	RMA Environmental Health Division	RMA Planning Division	Sheriffs Office	Ventura County Air Pollution Control District
22. Wildfire Hazards				●								
23. Hazardous Materials & Waste									●			
24. Public Services				●		●					●	
25. Utilities & Service Systems				●			●		●			
26. Transportation			●	●			●					

1.3.2 Section Organization

Each section of the ISAGs provides a framework for evaluating a specific environmental issue and contains the sections described below.

Background and Context

Provides a brief introduction of the environmental issue along with background information and context pertinent to the evaluation of impacts. Oftentimes, additional information related to the environmental issue can be found in the Ventura County General Plan Background Report ("Background Report").

Thresholds of Significance

Enumerate qualitative and/or quantitative thresholds of significance related to the environmental issue and provide specific requirements or exceedance levels to ensure that impacts resulting from a project would be less than significant. The thresholds help determine whether a project's impact may be significant.

Impact Analysis

Provides guidelines for evaluating the level of impact based on the specified threshold criteria and how to determine whether a given significance threshold has been met.

References

Include a list of source documents, plans, regulations, tools, or other resources that are cited or referenced throughout the section, the agency responsible for the specific source reference, and hyperlinks to the source if available online.

Appendices

Include supplemental information that is associated with the guidelines provided in the section.

1.3.3 Glossary

The glossary contains definitions for technical terms that are used frequently throughout the ISAGs document. Technical terms included in the glossary are identified by italicized text throughout the document with a subtle dashed green underline, such as *this example*. Federal, state, and local regulations or policies are cited as the source for several definitions. Where a conflict occurs between the ISAGs definition and the definition used in the regulation or policy, the definition from the regulation or policy shall prevail.

1.4 PREPARING AN INITIAL STUDY

Details on the Initial Study process are further discussed in Section 4.2 of the CEQA Implementation Manual. An Initial Study may be completed by the *Lead Agency* for a discretionary project if the project is not exempt from CEQA or another state or federal law. An Initial Study is not required if the *Lead Agency* determines that a full EIR will be required for the project (State CEQA Guidelines Section 15063). However, it may still be desirable as a means to focus the EIR. Without an Initial Study, the EIR must address all environmental issues listed in the Initial Study Checklist. Each agency/department responsible for review of one or more environmental issue as identified in Table 1-1 must concur with the factual basis for determining both individual and cumulative effects for their specific environmental issue(s).

The Initial Study shall consist of four sections: Project Description, Initial Study Checklist, Mandatory Findings of Significance, and Determination of Environmental Document. An Initial Study template is accessible online (see Section 1.6).

1.4.1 Project Description

The project description should sufficiently capture the nature and extent of the project (see "Definition of Project" in Section 3.2 of the CEQA Implementation Manual). This section should include the project name and number, name of applicant, project location (including map), specific description of the nature and purpose of the project, existing and proposed land use designation and zoning of the project site, a description of all proposed project activities (construction, operation, maintenance), including the physical alterations/improvements proposed by the project (including site plan, elevations, off-site improvements, etc.), a description of the public facilities (e.g., roads, water supply, sewers, utilities) that must be extended or expanded to serve the project, and a list of all *Responsible Agencies* as defined in State CEQA Guidelines Section 15381.

1.4.2 Initial Study Checklist

For each environmental issue listed in the Initial Study Checklist and described in the subsequent sections of the ISAGs, a determination shall be made as to whether the project could have an effect on the existing environment, and whether that effect could be significant. The Initial Study must consider the whole action involved, including on-site as well as off-site, project-level as well as cumulative, direct as well as indirect, and construction as well as operational impacts. For purposes of technical review, environmental issues have been assigned to specific agencies/departments on the basis of their professional expertise (see Section 1.3.1). Should there be any environmental issues that are unassigned, the *Lead Agency* shall be responsible for acquiring appropriate professional expertise to address that environmental issue.

In responding to each environmental issue on the Initial Study Checklist, the *Lead Agency* shall use the ISAGs and its professional judgment, which requires analysis of the scientific and factual data that are a matter of public record (see State CEQA Guidelines Section 15064(b)). The subsequent sections of the ISAGs provide a brief discussion of each environmental issue and guidance for analyzing each issue. For all County public works projects occurring within city limits, the *Lead Agency* may use city-adopted Initial Study threshold criteria that cover the same environmental issue found within the Initial Study Checklist.

Project Impacts

"Effects" and "impacts" are used synonymously throughout the ISAGs. Impacts analyzed under CEQA must be related to a physical change to the environment. Project impacts include both *direct* and *indirect impacts*.

Direct or primary impacts are physical changes in the environment caused by the project and occur at the same time and place. Examples include dust, noise, and traffic of heavy equipment that would result from construction of a sewage treatment plant.

Indirect or secondary impacts are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. If a direct physical change in turn causes another change, then the other change is an *indirect impact*. For example, the construction of a new sewage treatment plant or extension of a sewer may facilitate population growth in the service area due to the increase in sewage treatment or service capacity and may lead to an increase in air pollution (State CEQA Guidelines Section 15064(d)).

Indirect impacts may also include reasonably foreseeable growth inducing impacts and other impacts related to induced changes in the pattern of land use, population density, or growth rate, and related impacts on air and water and other natural systems, including ecosystems. Growth inducement is defined in State CEQA Guidelines Section 15126.2(e), as may be amended, which states, "the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas)."

Cumulative Impacts

Each agency/department assigned to an environmental issue is responsible for determining the geographical area subject to the cumulative impact assessment for that issue. For those issues that are unassigned to a specific agency, the *Lead Agency* shall determine the geographical area appropriate for that issue.

Cumulative impacts are defined by State CEQA Guidelines Section 15355 as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The incremental impact of a project, when added to the related impacts of other closely related past, present, and reasonably foreseeable probable future projects, contributes to a cumulative impact that results in a change in the environment. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

The project under review must contribute to the adverse impact in order for its impact to be characterized as a cumulative impact.[2] In other words, if a project does not make some contribution to a cumulative environmental effect, the cumulative effect cannot be characterized as a cumulative impact of that project under review.

Pursuant to State CEQA Guidelines Section 15064(h), when assessing whether a cumulative effect requires an EIR, the *Lead Agency* shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable.

In addition, a project's incremental contribution to a cumulative impact is not cumulatively considerable if the project would comply with the requirements in a previously approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative impact within the geographic area in which the project is located (e.g., water quality control plan, air quality attainment or maintenance, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions). Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the county/special district. When relying on a plan, regulation or program, the *Lead Agency* should explain how implementing the requirements in the plan, regulation or program ensures that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is *substantial evidence* that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program, an EIR must be prepared for the project. The mere existence of significant cumulative impacts caused by other projects alone shall not constitute *substantial evidence* that the proposed project's incremental effects are cumulatively considerable.

Discussion of Cumulative Impacts

Pursuant to State CEQA Guidelines Section 15130(b), the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not be as detailed as the discussion on effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact contributions of other identified projects, rather than the attributes of other projects which do not contribute to the cumulative impact. The following elements are necessary to an adequate discussion of significant cumulative impacts:

a. A list of past, present, and reasonably foreseeable probable future projects that produce related or cumulative impacts, including, if necessary, those projects outside the control of the agency. When utilizing a list of past, present, and reasonably foreseeable probable future projects, factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project, and its type. Location may be important, for example, when water quality impacts are at issue since projects outside the watershed would probably not contribute to a

[2] *Sierra Club v. West Side Irrig. Dist.* (2005) 128 Cal.App.4th 690, 700.

cumulative effect. Project type may be important, for example, when the impact is specialized, such as a particular air pollutant or mode of traffic.

b. A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the *Lead Agency*.

c. The geographic scope of the area, defined by the *Lead Agency*, that would affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.

d. A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available.

e. A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, *feasible* options for mitigating or avoiding the project's contribution to any significant cumulative effects.

Use of Previous EIRs to Identify Cumulative Impacts

Each assigned agency/department is also responsible for determining whether the certified EIR for the Ventura County General Plan or another certified EIR is sufficient to address the cumulative impact assessment for their assigned environmental issue. At a minimum, the EIR must include sufficient detail to adequately address the impacts of the project being reviewed.

If the previous EIR is sufficient to cover a subsequent project, the Initial Study must reference the EIR, describe where a copy can be viewed, and provide a brief summary.

For environmental issues that were not sufficiently assessed in a previous EIR to address cumulative impacts, a list of approved and proposed projects can be used. Information regarding discretionary permits/entitlements related to land use and development can be obtained from the Ventura County Resource Management Agency (RMA) Planning Division. Information regarding city permits/entitlements can be obtained from the planning departments of the respective cities.

In addition to approved and proposed projects, the cumulative analysis must also consider reasonably foreseeable probable future projects. If there has been a public announcement of a pending project, then that project should be included. In cases where the project includes a legislative amendment (General Plan amendment or zone change), it is also important to consider the potential of similar amendments for similar properties within the specified geographical area identified for the cumulative analysis.

Adopted Forecasts/Land Use Plans

The Ventura County General Plan's population, *dwelling unit* and employment forecasts, in conjunction with the land use maps, should be used as the foundational basis for determining cumulative development within the specified geographical area for those environmental issues that were sufficiently addressed in the certified EIR of the Ventura County General Plan or are directly or indirectly related to population, *dwelling units* or employment growth (e.g., Public Services). Refer to the Background Report for forecasts on population, *dwelling unit*, and employment. In addition, all known General Plan amendments that have been filed or are likely to be filed in the same

geographical area should be added to the forecasts. Information regarding Ventura County General Plan amendments can be obtained from the Ventura County RMA Planning Division.

Whether a cumulative impact is significant, and whether a project's incremental contribution is cumulatively considerable varies by environmental issue and the facts and circumstances of each case.

Determining Level of Impact

If the *Lead Agency* determines that the project would have absolutely no project or cumulative impact for a particular threshold of significance, the *Lead Agency* shall mark "N" (no impact) for that threshold.

The *Lead Agency* shall mark "LS" (less than significant impact) for a particular threshold of significance if it determines that the project may have a project impact but the impact would be less than significant, or that the incremental impacts of a project are not cumulatively considerable pursuant to CEQA Guidelines Section 15064(h)(1) because the project would result in only a de minimis contribution to a potentially significant cumulative impact caused by other projects. A de minimis contribution means that the environmental conditions would essentially be the same (no measurable or perceptible change) whether the proposed project is implemented.

The *Lead Agency* shall mark "LS-M" (less than significant impact with mitigation incorporated) for a particular threshold of significance if it determines that, with the incorporation of project revisions or mitigation measures, a project's effects would clearly be reduced to less than significant or that a project's contribution to a cumulative would be less than cumulatively considerable. See also State CEQA Guidelines Section 15064(h)(2).

The *Lead Agency* shall mark "PS" (potentially significant impact) for a particular threshold of significance if it determines that a project may have a potentially significant project impact that requires further analysis in an EIR including to determine whether the project could feasibly mitigated to a less than significant level, or that the project could have a substantial contribution to a potentially significant cumulative impact. Refer to State CEQA Guidelines Sections 15063(b), 15064, 15070, 15126, 15126.2, 15130 and 15355 for a complete discussion of this matter.

For every "N", "LS", "PS-M" or "PS" determination in the Initial Study Checklist, the *Lead Agency* shall provide a brief description of the environmental setting for each environmental issue and the factual basis for each impact determination with respect to both individual and cumulative impacts, and shall also provide appropriate references to the source(s) of such factual data. Examples of such information sources include, but are not limited to previously certified EIRs, general plans, zoning ordinances, initial study assessment guidelines, or other published documents in support of the determination being made. References to previously prepared document(s) shall, where appropriate, include a reference to the page or pages where the substantiating information appears. A source list shall be attached to the Initial Study, and other sources used or individuals contacted should be cited in the discussion. All responses must take account of the whole action involved, including on-site as well as off-site, project-level as well as cumulative, direct as well as indirect, and construction as well as operational impacts.

For every "PS-M" determination in the Initial Study Checklist, the *Lead Agency* shall also provide a description of the mitigation measure(s) that are proposed to be incorporated into the project in order to reduce an otherwise "PS" impact to "LS-M." This description shall also include a brief explanation of how each mitigation measure would reduce the identified impact to a less than significant level. The proposed mitigation measures must be *feasible* pursuant to State CEQA

Guidelines Sections 15126.4, 15364 and 15370, shall include sufficient information to comply with the mitigation or reporting requirements of Public Resources Code Section 21081.6 and State CEQA Guidelines Section 15097, and must be agreed to by the project applicant.

For every "PS" determination made in the Initial Study Checklist, the *Lead Agency* shall, if possible, specify what additional information would be required in order to enable the *Lead Agency* to make a "PS-M" determination. This additional information may subsequently take the form of an expanded and/or revised Initial Study (if time permits) or an EIR.

1.4.3 Mandatory Findings of Significance

Based on the responses to the environmental issues listed in the Initial Study Checklist and the discussion of effects and mitigation measures, the *Lead Agency* shall answer the questions in the Initial Study Checklist related to the Mandatory Findings of Significance. Refer to State CEQA Guidelines Section 15065.

1.4.4 Determination of Environmental Document

Based on responses to the questions related to the Mandatory Findings of Significance and the information supplied in the Initial Study Checklist, the *Lead Agency* shall determine which environmental document should be prepared. An EIR should be prepared when a "PS" determination has been made in the Mandatory Findings of Significance.

1.5 AMENDMENTS TO THE ISAGS

From time to time, amendments to the ISAGs may be necessary due to changes in state law, internal regulatory and policy changes, technological changes or administrative convenience. County agencies/departments and legislative bodies may request amendments to the ISAGs. All amendment requests shall be submitted to, and processed by, the Ventura County RMA Planning Division. All amendments must be consistent with CEQA and supported by *substantial evidence*.

The Ventura County RMA Planning Director or designee is authorized to make administrative amendments without Board of Supervisors approval for changes not involving the exercise of discretion such as updating assessment methodologies in keeping with the most recent regulatory requirements and revising or updating reference materials and technical or legal citations; and addressing grammatical and formatting issues. These administrative amendments shall be considered for approval at a public hearing before the Ventura County RMA Planning Director or designee. Decisions to make administrative amendments that are approved by the Ventura County RMA Planning Director or designee may be appealed to the Board of Supervisors pursuant to Section 9 of the Ventura County CEQA Implementation Manual.

In contrast, all amendments to the ISAGs involving the exercise of discretion must be approved by the Board of Supervisors.

Prior to adopting any amendments to the ISAGs, the Ventura County RMA Planning Division shall provide public notice in accordance with State CEQA Guidelines Section 15087(a)(1) and allow the public a minimum of 30 days to review and comment on the proposed amendment(s).

1.6 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
Ventura County General Plan (including Background Report and Final EIR)	Ventura County RMA Planning Division	Website

2. Agriculture and Forestry Resources

2.1 BACKGROUND AND CONTEXT

This topic analyzes whether a project could result in loss of agricultural resources or conversion of agricultural resources to non-agricultural uses. It also considers whether a project could result in the loss of agricultural resources by allowing for non-agricultural land uses *adjacent* to agricultural resources. The analysis also evaluates the potential for conflicts between projects with existing zoning for agricultural use, *Williamson Act contracts*, and zoning for *forest land* or *timberland* production. Loss of forestland or conversion of *forest land* to non-forest use is also evaluated in this section.

2.1.1 Agricultural Soils

Soil that is utilized or suitable for agricultural crop production is considered an important, irreplaceable agricultural resource. This issue entails the direct loss of *Important Farmland* due to removal or permanent overcovering, and the indirect loss of *Important Farmland* resulting from the siting of non-agricultural land uses *adjacent* to *Important Farmland*. Examples of indirect losses of *Important Farmland* due to land use conflicts include, but are not limited to, decreased solar access due to building heights from nonagricultural uses, dust exposure from construction or ongoing operations, a reduction in available water resources for irrigation, or loss of an agricultural tree row or other changes that increase wind and water erosion.

2.1.2 Farmland Mapping and Monitoring Program

The California Department of Conservation established the *Important Farmland* Mapping and Monitoring Program (FMMP) in 1982. Recent data (2016) from the California Department of Conservation FMMP inventoried over 555,000 acres of land in Ventura County, classifying over 118,000 acres of land as *Important Farmland*. Over 430,000 acres inventoried are in the unincorporated county, while the remaining 126,000 acres are part of incorporated cities. FMMP classifies land into five agricultural categories (*Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance*, and Grazing Land) and three non-agricultural categories (Urban and Built-up Land, Other Land, Water). Four of the five agricultural categories (excluding Grazing Land) are considered *Important Farmland*. The fifth category, Grazing Land, contains vegetation suitable for livestock grazing.

The distribution of *Important Farmland* in Ventura County is shown on Figure 9-2 in Section 9.1 of the Ventura County General Plan Background Report ("Background Report") or as depicted on the Ventura County *Resource Management Agency Geographic Information System (RMA GIS) Viewer*. The FMMP classifies 118,508 acres of land in Ventura County as *Prime, Farmland of Statewide Importance, Unique, or Farmland of Local Importance*. Of that total, 35 percent or 40,976 acres, is designated *Prime Farmland*, as shown in Table 9-2.1 of Section 9.1 of the Background Report.

2.1.3 California Land Conservation Act (Williamson Act)

The Land Conservation Act (also known as Williamson Act) is implemented and regulated by the County through the County's entry into three contract types at the request of property owners: Land Conservation Act Contract (LCA), the Farmland Security Zone Area Contract (FSZA/LCA), and the Open Space Contract (OS/LCA) shown on Figure 9-10 in Section 9.3 of the Background Report. These contracts require preservation of agricultural and open space land and discourage its premature conversion to non-agricultural uses. Additional details on the three types of Land Conservation Act contracts and information on existing contracts within Ventura County are provided in Section 9.3 of the Background Report.

2.1.4 Land Use Compatibility

The County has numerous regulations in place to minimize conflicts between agricultural and urban land uses to ensure compatibility with, and the long-term productivity of, the agricultural sector, including the Save Open Space and Agriculture Resources (SOAR) initiative measure, the Guidelines for Orderly Development, the Land Conservation Act program, greenbelt agreements with Ventura County cities, the Ventura County Agricultural/Urban Buffer Policy, the Ventura County Right-to-Farm Ordinance, and the Ventura County Hillside Erosion Control Ordinance. In addition, the Ventura County General Plan Agriculture Element includes goals and policies, and the County's zoning ordinances contain zoning designations and land use rules, that also contain various compatibility protections.

The siting of non-agricultural land uses *adjacent* to *Important Farmland* can result in indirect losses of agricultural resources due to land use conflicts including, but not necessarily limited to, decreased solar access due to building heights from nonagricultural uses, dust exposure from construction or ongoing operations, and a reduction in available water resources for irrigation. Incompatibility issues can also result from the effect of agricultural operations on *adjacent*, non-agricultural land uses, such as the application of *Restricted Materials*.

2.1.5 Forest & Timberlands

The Timberland Productivity Act of 1982 requires all counties and cities in California with productive private *timberland* to establish Timberland Production Zones for the purpose of discouraging the premature conversion of *timberland* to other uses (Government Code Section 51100 *et seq.*). The general plan must reflect the distribution of existing Timberland Production Zones and have a land use category that provides for timber production.

The Ventura County Non-Coastal Zoning Ordinance regulates forest resources through Section 8104-6.2. This ordinance provision defines the purposes of the Timber-Preserve zone as follows: to maintain the optimum amount of the limited supply of *timberland* so as to ensure its current and continued availability for the growing and harvesting of timber, and compatible uses; to discourage premature or unnecessary conversion of *timberland* to urban area designations and other uses; and to encourage investment in *timberlands* based on reasonable expectation of harvest.

Ventura County does not contain land which produces timber commercially for eventual use as lumber or pulp; however, six parcels either currently or formerly used for Christmas tree farming are zoned Timberland Preserve (T-P) pursuant to the provisions of the Timberland Preserve Zone of the Ventura County Non-Coastal Zoning Ordinance.

2.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

AGR-1 A project may have a significant impact if it would result in the loss of *Important Farmland* exceeding the thresholds set forth in Table 2-1 below.

Table 2-1. Important Farmland Acreage Loss Thresholds

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

AGR-2 A project may have a significant impact on agricultural resources based on land use incompatibility if it is located closer than the radius distances set forth below in Table 2-2.

Table 2-2. Land Use Incompatibility Thresholds for Non-Agricultural Projects

Proposed Project	Distance from Non-Agricultural Structure or Use to Important Farmland Within the Applicable Radius Distance
Without Vegetative Screening	300 feet
With Vegetative Screening	150 feet
New K-12 School	1,320 feet

AGR-3 A project may have a significant impact if it would a) conflict with an existing *Williamson Act Contract* and b) result in a significant adverse environmental effect due to that conflict.

AGR-4 A project may have a significant impact if it would involve changes in the existing environment which, due to their location or nature, could result in the loss of *forest land*, conversion of *forest land* to non-forest use, or causes the rezoning of *forest land*, *timberland*, or *timberland* zoned T-P for non-forest use.

2.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 2.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project result in the loss of Important Farmland exceeding the thresholds set forth in Threshold No. AGR-1?

The *Lead Agency* shall: 1) review the project materials to determine the area of agricultural land that would be directly or indirectly lost due to project implementation (e.g., from buildings, parking areas, driveways, etc.), 2) review the Land Use Maps and *Important Farmland* Maps in the Ventura County General Plan and on *RMA GIS Viewer*, and 3) determine whether the project meets or exceeds the *Important Farmland* acreage loss thresholds set forth in Table 2-1 above.

The Department of Agriculture/Weights & Measures shall be consulted in determining project significance and potential mitigation measures, if necessary. Projects that would result in loss of *Important Farmland* in exceedance of the acreage loss thresholds set forth in Table 2-1 are considered to have a potentially significant impact.

Cumulative Impact Analysis

Pursuant to California Environmental Quality Act (CEQA) Guidelines section 15183, projects that are consistent with the development density established by the County's existing General Plan policies or applicable zoning ordinance for which an Environmental Impact Report (EIR) was certified do not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects that are peculiar to the project or its site. This principle is relevant to the County's assessment of cumulative loss of *Important Farmland*, which was addressed in the certified EIR for the Ventura County General Plan ("General Plan EIR"). The General Plan EIR concluded that the cumulative impacts to loss of *Important Farmland* resulting from the development density established by the Ventura County General Plan was significant and unavoidable and addressed such cumulative impacts in a Statement of Overriding Considerations and adopted mitigation measures. Such cumulative impacts to *Important Farmland* resulting from implementation of the General Plan are not required to be re-studied. Therefore, if a project is consistent with the development density established by the Ventura County General Plan or zoning ordinances for which the General Plan EIR or other applicable EIR was certified, additional cumulative impact analysis is not required for the loss of *Important Farmland*. However, to the extent that such consistency does not exist (for instance, if a project would amend the Ventura County General Plan's or zoning ordinance's development density-related provisions in a manner that has not been addressed in a certified EIR), then cumulative impact analysis is required.

Impact Mitigation

Ventura County General Plan Policy AG-1.8 requires that projects located on land identified as *Important Farmland* shall be conditioned to avoid direct loss of *Important Farmland* to the extent *feasible*.

Projects that will result in loss of *Important Farmland* in exceedance of the acreage loss thresholds set forth in Table 2-1 shall comply with the below-stated requirements for an *agricultural conservation easement* consistent with Ventura County General Plan Program AG-O, unless an

alternate mitigation measure is imposed that will result in the physical creation, restoration or replacement of a quantity and quality of offsite *Important Farmland* that is equivalent to the *Important Farmland* being lost as a result of the project. "Offsite" means an area that is outside of the project's permit boundaries if applicable and would not be disturbed by the project with respect to agricultural soils or production.

Projects that would result in loss of *Important Farmland* in exceedance of the acreage loss thresholds set forth in Table 2-1 shall ensure the permanent protection of offsite farmland of equal quality at a 1:1 ratio (acres preserved: acres converted) through the establishment of an offsite *agricultural conservation easement*, unless the alternative mitigation described above is imposed to result in the physical creation, restoration or replacement of *Important Farmland* lost as a result of the project. Areas that are outside the identified permit boundaries but are on the same property as the project may be considered for an offsite *agricultural conservation easement*, where *feasible*. Discretionary projects that develop and provide housing for use by farmworkers and their families are not subject to this *agricultural conservation easement* requirement.

Agricultural Conservation Easement Mitigation

The project applicant shall be required to prepare and submit a report for the review and approval of the Ventura County Resource Management Agency (RMA) Planning Division, in consultation with the Ventura County Department of Agriculture/Weights & Measures. The report shall identify a minimum of one proposed potential mitigation site suitable for ensuring the permanent protection of offsite farmland of equal quality at a 1:1 ratio (acres preserved: acres converted) through the establishment of one or more offsite *agricultural conservation easements*. The preservation of more than one offsite *agricultural conservation easement* may be considered in order to meet the required number of acres. The applicant shall also deposit funds with the County to contract with a qualified third-party agricultural economic consultant to review and advise the Ventura County RMA Planning Division and Ventura County Department of Agriculture/Weights & Measures regarding the establishment and implementation of the *agricultural conservation easement(s)*. The contents of the report shall be determined, reviewed, and approved by the Ventura County RMA Planning Division in consultant with the Ventura County Department of Agriculture/Weights & Measures (hereafter referred to as the "reviewing agencies"), and shall include information necessary for the reviewing agencies and a qualified entity responsible for holding the *agricultural conservation easement* (e.g., a land trust organization) to determine the viability of the proposed mitigation site(s) for the establishment of a permanent *agricultural conservation easement*.

Among the factors necessary for approval by the reviewing agencies, the proposed mitigation site(s) shall be located in the unincorporated area of Ventura County, must not already have permanent protection, must be equivalent to or greater than the type of *Important Farmland* (e.g., *Unique Farmland*) that would be converted by the project, and must be of sufficient size to be viable for long-term farming use as determined by the County. Among other terms that may be required by the reviewing agencies in consultation with the qualified entity, the terms of an *agricultural conservation easement* shall include a requirement that it run with the land. There must also be a provision for annual monitoring by the qualified entity or its representative to ensure adherence to the terms of the agricultural conversation easement. Project applicants are responsible for all costs incurred by the County and the qualified entity to successfully implement the report. Proof of the successful establishment of an *agricultural conservation easement* shall be provided to the Ventura County RMA Planning Division prior to issuance of a zoning clearance for the inauguration of the project.

(b) Would the project be located closer than the radius distances set forth in Threshold AGR-2?

Any project not defined as Agriculture or Agricultural Operations in the County's applicable zoning ordinance that is located within the applicable radius distance to *Important Farmland* set forth in Threshold AGR-2 will be evaluated for impacts to the *Important Farmland* based upon land use compatibility.

The *Lead Agency* shall consult with the Ventura County RMA Planning Division and the Ventura County Department of Agriculture/Weights & Measures to review the *Important Farmland* Inventory layer on *RMA GIS Viewer* to determine whether there is *Important Farmland* within the vicinity of the project. The *Lead Agency* shall determine, in consultation with the Ventura County RMA Planning Division and Ventura County Department of Agriculture/Weights & Measures, whether the proposed project structures or uses are within the applicable radius distances as specified in Table 2-2. The radius distance shall be measured from the edge of the proposed structure or use as illustrated in Appendix 2A.

The *Lead Agency* shall also consider the following additional issues when evaluating whether any incompatible land use is created by non-agricultural projects near *Important Farmland*: whether dust from construction or ongoing operations will occur and whether the project type will deplete a water source intended for agricultural irrigation or result in contaminated drainage.

A project that has a potentially significant impact based upon proximity to *Important Farmland* pursuant to Table 2-2 may be considered to have a less than significant impact if one or more of the factors set forth in Table 2-3 exist. However, depending upon the specific circumstances, mitigation may be required to avoid a significant impact. The factors in Table 2-3 do not apply to projects that involve new K-12 schools. The Ventura County Department of Agriculture/Weights & Measures shall be consulted in determining impact significance and potential mitigation measures, if necessary.

Table 2-3. Factors That May Establish a Less Than Significant Impact Based Upon Incompatibility

Factors
The new use is a single-family dwelling on a parcel with AE, OS, RA, RE, COS, CA, or CR zoned land.
Existing topography eliminates or reduces land use conflicts.
There is mature vegetative screening on the project site at the boundary.
There is an offsite right of way or easement at the boundary that precludes farming.
There are offsite physical features at the boundary area that preclude farming.
Individuals are not continuously present in the proposed structures or use areas.
The non-agricultural use is a farmworker or other housing complex with a functional notification and response plan for the use of *Restricted Materials* on or off-site within 300 ft of the housing.
The non-agricultural use could easily be temporarily closed to allow scheduled *Restricted Materials* applications by an *adjacent* farmer.
The non-agricultural use is a continuing industrial use with no substantial changes in existing land use incompatibility.

Impact Mitigation

If the project is within any of the applicable threshold distance(s) set forth in Table 2-2, and none of the factors listed in Table 2-3 exist, the project shall be considered to have a potentially significant impact.

If the project is within any of the applicable threshold distance(s) set forth in Table 2-2 but at least one of the factors listed in Table 2-3 exists, the project may be considered to have a less than significant impact. However, depending upon the specific circumstances, mitigation may be required to avoid a potentially significant impact.

For most projects within the applicable threshold distance(s) set forth in Table 2-2 where dust from construction or ongoing operations will occur, a mitigation measure such as the following should be imposed:

> *Activities must be halted during high winds to prevent dust from blowing off-site onto Important Farmland. Any operations that create dust, such as vehicles driven on unpaved areas or open storage, require periodic watering to prevent dust.*

(c) Would the project 1) conflict with an existing Williamson Act Contract and 2) result in a significant adverse environmental effect due to that conflict?

Note that the cancellation of a *Williamson Act Contract* is a non-exempt discretionary action that is normally subject to CEQA review.

The *Lead Agency*, in consultation with the Ventura County RMA Planning Division, shall review the Land Conservation Act layer in *County View* and *RMA GIS Viewer* to determine whether the project site is subject to an effective *Williamson Act Contract*. The project may result in a potentially significant impact due to a conflict with an existing *Williamson Act Contract* at the project site. Conflicts may include, but are not limited to, uses that are inconsistent with the Ventura County Land Conservation Act Guidelines or material breach of the contract due to project implementation. Government Code Section 51250(b) states circumstances constituting a material breach of a *Williamson Act Contract* under the statute.

(d) Would the project involve changes in the existing environment which, due to their location or nature, could result in the loss of forest land, conversion of forest land to non-forest use, or causes the rezoning of forest land, timberland, or timberland zoned T-P for non-forest use?

The *Lead Agency*, in consultation with the Ventura County RMA Planning Division, shall evaluate whether the project would cause changes in the existing environment which, due to their location or nature, could result in conversion of *forest land* to non-forest use. In the event the Ventura County RMA Planning Division determines that the project would cause such changes in the existing environment, the Ventura County RMA Planning Division shall evaluate potential mitigation measures to reduce such potentially significant impacts. The Ventura County RMA Planning Division shall also determine if the project is located on land zoned Timberland Preserve (T-P). If so, the Ventura County RMA Planning Division shall evaluate whether the project results in the loss of *forest land* or converts *forest land* to non-forest use. The Ventura County RMA Planning Division shall also evaluate whether the project conflicts with existing zoning or causes the rezoning of land zoned T-P. In the event the project results in the loss or conversion of *forest land*, or conflicts with existing zoning or causes the rezoning of land zoned T-P, the Ventura County RMA Planning Division shall evaluate potential mitigation measures to reduce potentially significant impacts.

2.4 RESOURCES & REFERENCES

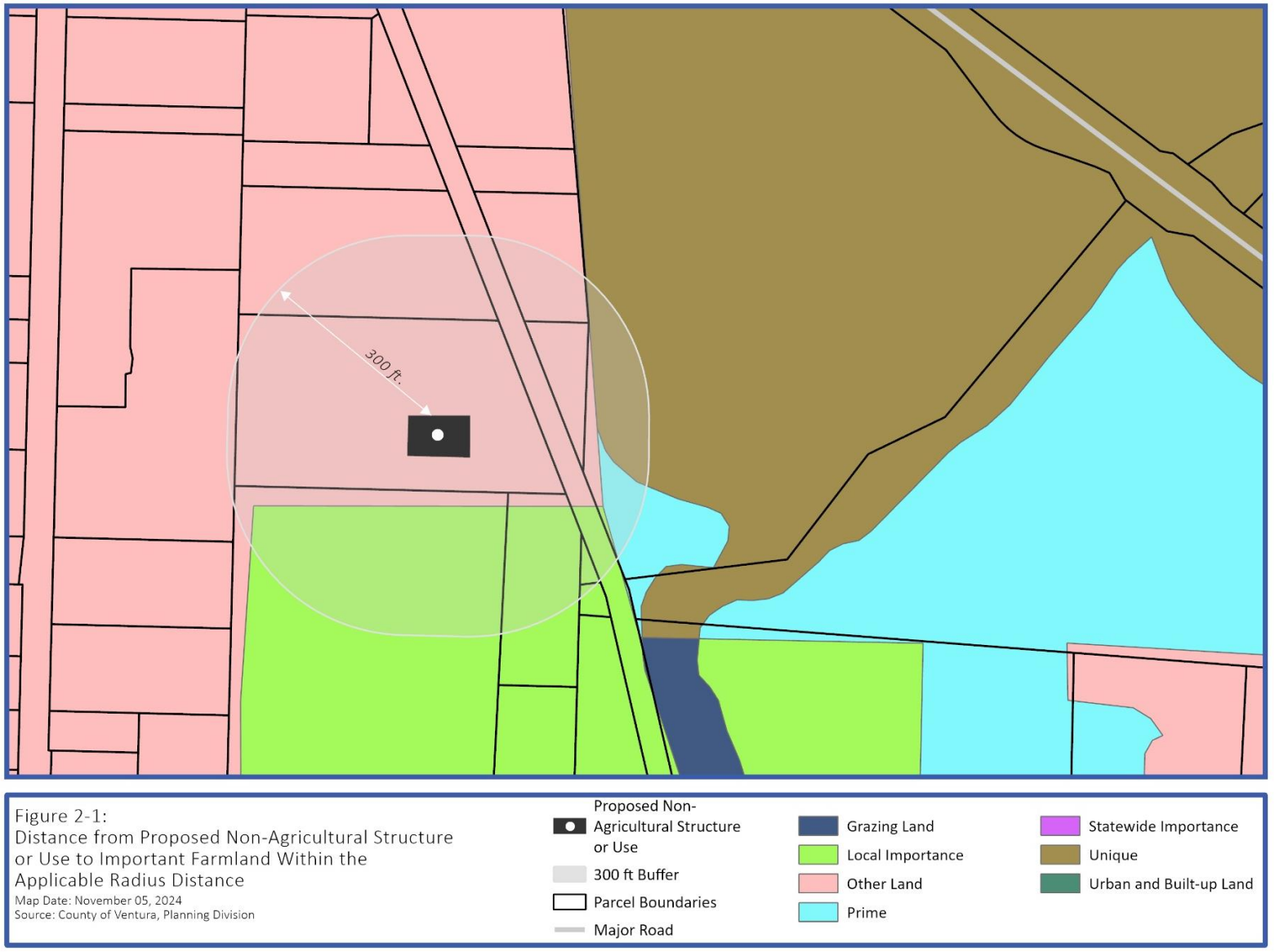
Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
County View	Ventura County Geographic Information Systems	Website
Environmental Impact Report for the Ventura County General Plan	Ventura County RMA Planning Division	Website
Farmland Mapping & Monitoring Program	California Department of Conservation, Division of Land Resource Protection	Website
Land Conservation Act (Williamson Act) Statewide Program	California Department of Conservation, Division of Land Resource Protection	Website
Ventura County Agricultural/Urban Buffer Policy	Ventura County RMA Planning Division	PDF | Website
Ventura County General Plan, Agriculture Element	Ventura County RMA Planning Division	PDF | Website
Ventura County General Plan Background Report, Chapter 9	Ventura County RMA Planning Division	PDF | Website
Ventura County General Plan, Guidelines for Orderly Development	Ventura County RMA Planning Division	PDF
Ventura County General Plan, SOAR Initiative	Ventura County RMA Planning Division	PDF
Ventura County Land Conservation Act Program	Ventura County RMA Planning Division; Ventura County Department of Agriculture/Weights & Measures	Website
Ventura County Non-Coastal Zoning Ordinance	Ventura County RMA Planning Division	PDF | Website
Ventura County Right-to-Farm Ordinance	Ventura County RMA Planning Division	Website
Ventura County RMA Geographic Information Systems Viewer	Ventura County Information Technology Services	Website

APPENDIX 2A

Radius Distance of Non-Agricultural Projects

See Figure 2-1 below for an example proposed project without vegetative screening and *Important Farmland* within the vicinity of the project. In this example, a 300-foot radius distance is used (per Table 2-2) to measure the distance between the use and *Important Farmland*. The purpose of this figure is to illustrate the measurement of the radius distance. The level of impact, as well as any mitigation measures if deemed necessary, shall be evaluated based on the considerations posed by the appropriate assessment methodologies outlined in the Initial Study Assessment Guidelines.

Figure 2-1. Distance from Proposed Non-Agricultural Structure or Use to Important Farmland Within the Applicable Radius Distance



3. Air Quality

3.1 BACKGROUND AND CONTEXT

3.1.1 Ozone Air Pollutants

Ozone is known as a secondary pollutant because it is formed in the atmosphere through a complex series of chemical reactions, rather than emitted directly into the air. *Ozone* is created when *reactive organic compounds (ROC)* and *oxides of nitrogen (NOx)* chemically react with sunlight. The major sources of *NOx* in Ventura County are motor vehicles and other combustion processes. The major sources of *ROC* in Ventura County are motor vehicles, cleaning and coating operations, petroleum production and marketing operations, and solvent evaporation.

California is divided into 15 air basins, which are geographic areas that exhibit similar meteorological and geographic conditions. Ventura County is located in the South Central Coast air basin and is under the jurisdiction of the Ventura County Air Pollution Control District (VCAPCD). Ventura County is currently designated as a *nonattainment area* for *ozone* under the 1-hour and 8-hour California Ambient Air Quality Standards (CAAQS) and the 8-hour National Ambient Air Quality Standards (NAAQS). Ambient air quality standards are maximum acceptable average concentrations of air pollutants during a specified period of time, calculated as described in the regulations specifying the standard. Additionally, Ventura County is listed as a *nonattainment area* for the 24-hour and mean CAAQS for respirable *particulate matter (PM)* with an aerodynamic diameter of 10 micrometers or less (*PM10*).

3.1.2 Other Air Pollutants

Toxic air contaminants (TACs), or hazardous air pollutants, are regulated in California primarily through the TAC Identification and Control Act (Assembly Bill (AB) 1807, Chapter 1047, Statutes of 1983), as well as the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588, Chapter 1252, Statutes of 1987). AB 1807 set forth a formal procedure for the California Air Resources Board (CARB) to designate substances such as *TACs*. To date, CARB has identified 23 *TACs* and adopted the Environmental Protection Agency's list of hazardous air pollutants as *TACs*. CARB added diesel *PM* (*PM2.5*) to the list of *TACs* in 1998.

Internal combustion engines are the primary source of diesel *PM* in Ventura County. There are several hundred *stationary sources* in Ventura County that emit toxic substances and are subject to AB 2588. The majority of locations are concentrated in incorporated or developed areas, including the cities of Oxnard, Camarillo, Thousand Oaks, Simi Valley, Ventura, Ojai, Santa Paula, and Fillmore (see Figure 8-3 in the Ventura County General Plan Background Report). The primary purpose of AB 2588 is to notify the public of facilities that have routine and predictable emissions of toxic air pollutants that may pose a significant health risk to nearby residents and workers. AB 2588 also encourages those facilities to reduce the health risk to below the level of significance.

Ventura County is not classified as having the potential to contain serpentine bedrock. Thus, there is no potential for naturally occurring asbestos in the unincorporated county.

PM, also known as particle pollution, is a complex mixture of extremely small particles and liquid droplets. *PM* is measured by two sizes: course particles (*PM10*), or particles between 2.5 and 10

micrometers in diameter; and fine particles (*PM2.5*), or particles less than 2.5 micrometers in diameter. The primary sources of *PM10* include dust, paved and unpaved roads, diesel exhaust, acidic aerosols, construction and demolition operations, soil and wind erosion, agricultural operations, residential wood combustion, and smoke. Secondary sources of *PM10* include tailpipe emissions and industrial sources. Road dust is composed of many particles other than soil dust. It also includes engine exhaust, tire rubber, oil, and truck load spills. Diesel exhaust contains many toxic particle and elemental carbon (soot) and is considered a *TAC* in California. *PM2.5* particles are emitted from activities such as industrial and residential combustion processes, wood burning, and from diesel and gasoline-powered vehicles. They are also formed in the atmosphere from gases such as sulfur dioxide, nitrogen oxides, ammonia, and volatile organic compounds that are emitted from combustion activities, and then become particles as a result of chemical transformations in the air (secondary particles).

3.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below and in further detail in the *Air Quality Assessment Guidelines (AQAG)*.

AIR-1 A project may have a significant impact if it would exceed 2 pounds per day or greater for *ROC* or *NOx*, as described in the *AQAG*, and cause a significant environmental impact due to a conflict with or obstruct implementation of the *Air Quality Management Plan (AQMP)*.

AIR-2 A project may have a significant impact if it would result in a cumulatively considerable net increase of a *criteria pollutant* for which the region is in non-attainment of the applicable federal or state standard.

AIR-3 A project may have a significant impact if it would expose *sensitive receptors* to substantial pollutant concentrations such as, but not limited to, *TACs*, dust, and odors.

3.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist are provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 3.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below and specified in further detail in the *AQAG*.

(a) Would the project exceed 2 pounds per day or greater for ROC or NOx, as described in the AQAG, and cause a significant environmental impact due to a conflict with or obstruction of the implementation of the AQMP?

As of March 2024, Ventura County is in nonattainment for *ozone* with respect to the CAAQS. As a result, the *AQMP ozone* control strategy consists of *stationary source* and transportation control measures, conformity with federal regulations, the State *Mobile Source* Strategy, reasonably available control measures, incentives, and smart growth policies and programs. *Stationary source* control measures include vapor collection systems on gasoline and oil storage tanks, and landfill gas recovery systems. These measures are included in rules adopted by VCAPCD. Other VCAPCD rules may impose emission limits or require cost effective emission reduction measures. These rules

can result in the use of emission reducing technology such as low-*NOx* burners, selective catalytic reduction, or using electric motors instead of internal combustion engines. Transportation control measures include trip reduction strategies, use of more fuel-efficient vehicles (e.g., hybrid, electric, hydrogen, etc.), vehicle miles traveled reduction, higher vehicle occupancy goals, and technological improvements. Consult the most recent *AQMP* as adopted by VCAPCD for the most up-to-date *ozone* control strategy.

The environmental document for proposed discretionary projects must address project consistency with the *AQMP*. Per the *AQAG*, project consistency with the *AQMP* is currently determined by comparing a project's expected population growth with the *AQMP*'s projected growth rates for the County Growth or Non-Growth Area as identified in the *AQMP*. The projected population growth rate is used as an indicator of future emissions from population-related emission categories in the *AQMP*. These emission estimates are used, in part, to project the date by which Ventura County will attain the federal *ozone* standard. The Ventura County Resource Management Agency Planning Division maintains an ongoing population tracking system to determine the existing population baseline for the project location. Therefore, a demonstration of consistency with the population forecasts used in the most recently adopted *AQMP* should be used for assessing project consistency with the *AQMP*. The procedures for determining project consistency with the *AQMP* are found in the *AQAG*.

(b) Would the project result in a cumulatively considerable net increase of a criteria pollutant for which the region is in non-attainment of the applicable federal or state standard?

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

In consideration of new and more stringent NAAQS and CAAQS adopted since 2000, VCAPCD identified numerical thresholds for project-generated emissions of *ozone precursors* (e.g., *ROC* and *NOx*) that would determine whether a project's non-VCAPCD permitted emissions would result in a cumulative, regional contribution (i.e., significant) to the baseline nonattainment status of Ventura County. These specific thresholds are found in the *AQAG* which, as of March 2024, are 25 pounds per day of *ROC* and *NOx* for all areas of Ventura County except the Ojai Planning Area (as defined in the *AQAG*), and 5 pounds per day of *ROC* and *NOx* in the Ojai Planning Area. These quantitative thresholds of significance for project-level evaluation shall be used to determine the extent to which a project's emissions of *ROC* and *NOx* would contribute to regional degradation of ambient air quality within Ventura County. In addition, VCAPCD recommends using the air emissions model CalEEMod in place of the model indicated in the *AQAG* to calculate a project's emissions, although model use and intent in the *AQAG* still applies.

The above-stated quantitative thresholds of significance apply to a project's operational (but not construction) emissions from non-VCAPCD permitted emission sources which primarily consist of *mobile sources*. In accordance with the *AQAG*, only non-VCAPCD permitted emissions during a project's operations (but not construction) count toward these quantitative thresholds. VCAPCD-permitted sources which, in general, consist of *stationary sources*, are not counted toward the quantitative thresholds because the VCAPCD's regulatory and permitting program constitutes mitigation for *criteria pollutant* air quality impacts under the California Environmental Quality Act. However, for purposes of disclosure and discretionary project consideration, the environmental document shall quantify a project's total operational *criteria pollutant* emissions from all sources,

including VCAPCD-permitted sources. The environmental document shall also identify all VCAPCD permits that the project will be required to obtain.

(c) Would the project expose sensitive receptors to substantial pollutant concentrations, such as, but not limited to, TACs, dust, and odors?

Toxic Air Contaminants

Using federal and state guidance pertaining to *TACs*, VCAPCD adopted cancer risk thresholds, which are contained in the *AQAG*, that were developed by the state Office of Environmental Health Hazard Assessment for *TAC* exposure. Unlike criteria air pollutants, there is no known safe concentrations of *TACs*. Moreover, *TAC* emissions contribute to the deterioration of localized air quality because of the dispersion characteristics of *TAC* emissions that do not cause regional-scale air quality impacts. The thresholds are designed to ensure that a source of *TACs* does not contribute to a localized, significant impact to existing or new receptors. The thresholds for *TACs* and additional guidance on assessing *TAC* emissions are, as of March 2024, found in Section 6 of the *AQAG*.

Proposed new land uses that will be located within one-quarter mile of an existing source (or sources) of *TACs* should be evaluated for the potential to be impacted by those *TACs*. When processing a land use entitlement for a project near an existing source of *TAC* emissions, consult with VCAPCD's Air Toxics Section to review any toxic air emissions information, especially health risk assessments, that VCAPCD may have regarding that source of *TAC* emissions. Such information may have been gathered by the VCAPCD pursuant to the District's AB 2588 Air Toxics "Hot Spots" Program and as part of the air pollution permit process for facilities that require air pollution permits.

Fugitive Dust

Fugitive dust or *PM* is mostly generated during construction activities of a project. As a result, the VCAPCD recommends emission reduction measures such as the use of water trucks, 15 miles per hour speed limit signs, rumble strips, covering truck loads, and other measures to comply with VCAPCD Rule 51, Nuisance, and Rule 55, Fugitive Dust. Pursuant to Ventura County General Plan Program HAZ-Z, discretionary development projects that will generate construction-related fugitive dust emissions shall be required to include dust reduction measures recommended by VCAPCD in its *AQAG*, or otherwise, such as:

- The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excess amounts of dust.
- Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of watering (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.
- Fugitive dust produced during grading, excavation, and construction activities shall be controlled by the following activities:
    - All trucks shall be required to cover their loads as required by California Vehicle Code Section 23114.
    - All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be treated to prevent fugitive dust. Treatment shall include, but not necessarily be limited to, periodic

watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering shall be done as often as necessary and reclaimed water shall be used whenever possible.

- Graded and/or excavated inactive areas of the construction site shall be monitored by (indicate by whom) at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.
- Signs shall be posted on-site limiting traffic to 15 miles per hour or less.
- During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact *adjacent* properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in conjunction with VCAPCD when winds are excessive.
- *Adjacent* streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to *adjacent* streets and roads.
- Personnel involved in grading operations, including contractors and subcontractors, should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.

VCAPCD Rule 55 defines a wind speed of 25 miles per hour or more as sufficient to cause fugitive dust that could impact *adjacent* properties when they are sustained for at least five minutes in any one-hour period as measured by an anemometer with a minimum resolution of one mile per hour. Under sustained high wind conditions, earth-moving active operations should either cease, or water shall be applied to the soil in the work area prior to commencing earth-moving activities.

Construction Criteria Pollutant Emissions

Pursuant to Ventura County General Plan Policy HAZ-10.13 and Ventura County General Plan Program HAZ-Y, discretionary development projects that may generate construction-related *criteria pollutant* emissions above the *AQAG* quantitative *criteria pollutant* threshold for project operations are required to include the following types of emission reduction measures and potentially others, as recommended by VCAPCD in its *AQAG* or otherwise, to the extent applicable to the project as determined by the County: maintaining equipment per manufacturer specifications; lengthening construction duration to minimize number of vehicle and equipment operating at the same time during the summer months; use of Tier 3 at a minimum, or Tier 4 if commercially available diesel engines in all off-road construction diesel equipment; and, if *feasible* using electric-powered or other alternative fueled equipment in place of diesel powered equipment.

Carbon Monoxide Hot Spots

VCAPCD no longer recommends the *AQAG* methodology for carbon monoxide (CO) hotspots, as CO hotspots are defined as locations where ambient CO concentrations exceed the CAAQS (20 parts

per million (ppm) for 1-hour standard, 9 ppm for 8-hour standard). The NAAQS for CO is 35 ppm for 1-hour standard and 9 ppm for the 8-hour standard. In Ventura County, ambient air monitoring for CO stopped in 2004, with the approval of the U.S. Environmental Protection Agency – Region 9, because CO background concentrations in El Rio, Simi Valley, and Ojai were much lower than the CAAQS [highest recorded CO background concentration in Ventura County was in Simi Valley at 6.2 ppm for 1-hour, 1.6 ppm for 8-hour (*AQAG*, Table 6-2)]. Therefore, no CO hotspots are expected to occur in the unincorporated area. In addition, with over 80 percent of the CO in urban areas emitted by motor vehicles, and with stricter, cleaner emission standards to the mobile fleet, CO ambient concentrations should remain at or lower than the most recent CO monitoring data available for Ventura County.

Odors

The *AQAG* includes methodology and guidance on identifying and mitigating potential odor impacts that could result from siting a new odor source near *sensitive receptors* or siting a new sensitive receptor near an existing odor source. Examples of land uses that have the potential to generate considerable odors include, but are not limited to, wastewater treatment and pumping facilities, landfills, recycling and composting stations, food manufacturing and services, refineries, and chemical plants.

3.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
Air Toxics Hot Spots Information and Assessment Act (AB 2588)	California Air Resources Board (CARB)	Website
California Ambient Air Quality Standards (CAAQS)	CARB	Website
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
National Ambient Air Quality Standard (NAAQS)	United States Environmental Protection Agency	Website
State Mobile Source Strategy	CARB	Website
Toxic Air Contaminant Identification and Control Act (AB 1807)	CARB	Website

Source	Managing Agency/Organization	Online Access
Ventura County Air Quality Assessment Guidelines (AQAG)	Ventura County Air Pollution Control District	PDF | Website
Ventura County Air Quality Management Plan (AQMP)	Ventura County Air Pollution Control District	PDF | Website
Ventura County General Plan Background Report, Chapter 8	Ventura County RMA Planning Division	PDF | Website
Ventura County General Plan, Hazards and Safety Element	Ventura County RMA Planning Division	PDF | Website

4. Greenhouse Gases

4.1 BACKGROUND AND CONTEXT

Certain gases in the Earth's atmosphere, classified as *greenhouse gases (GHGs)*, play a critical role in determining the Earth's surface temperature. Solar radiation enters the Earth's atmosphere from space. A portion of the radiation is absorbed by the Earth's surface, and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the Earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. The Earth has a much lower temperature than the sun; therefore, the Earth emits lower frequency radiation. Most solar radiation passes through *GHGs*; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on Earth. Prominent *GHGs* contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases (also known as F-gases) that include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Human-caused emissions of these *GHGs* in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change.

GHGs are global pollutants, unlike *criteria air pollutants* and *toxic air contaminants*, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), *GHGs* have long atmospheric lifetimes (one to several thousand years). *GHGs* persist in the atmosphere for long enough time periods to be dispersed around the globe.

4.1.1 Federal Initiatives

The U.S. government administers a wide array of public-private partnerships to reduce U.S. greenhouse gas intensity. These programs focus on energy efficiency, *renewable energy*, methane, and other non-carbon dioxide (non-CO_2) gases, agricultural practices, and implementation of technologies to achieve greenhouse gas reductions.

In 2015, the U.S Environmental Protection Agency (EPA) issued a final rule establishing emission standards for *GHG* emissions from new fossil fuel-fired utility boilers and natural gas-fired stationary combustion turbines. In 2016, EPA finalized two rules updating both the 1996 New Source Performance Standards for new and modified landfills and the 1996 guidelines for existing landfills to reduce emissions of methane-rich landfill gas.

The American Innovation and Manufacturing (AIM) Act of 2020 directs EPA to address HFCs by providing new authorities to phase down the production and consumption of listed HFCs, manage these HFCs and their substitutes, and facilitate the transition to next-generation technologies that do not rely on HFCs. On September 23, 2021, EPA issued a final rule that will phase down the U.S. production and consumption of HFCs by 85 percent over the next 15 years, as mandated by the AIM Act. A global phasedown of HFCs is expected to avoid up to 0.5°C of global warming by 2100.

On December 20, 2021, EPA finalized federal greenhouse gas emissions standards for passenger cars and light trucks for model years 2023 through 2026. These standards are the strongest vehicle emissions standards ever established for the light-duty vehicle sector and are based on sound science and grounded in a rigorous assessment of current and future technologies. The updated standards will result in avoiding more than 3 billion tons of GHG emissions through 2050.

4.1.2 Statewide Initiatives

Assembly Bill 32 - The California Global Warming Solutions Act of 2006

The enactment of Assembly Bill 32 (AB 32), "The California Global Warming Solutions Act of 2006" (Health & Safety Code §38500 et seq), established a comprehensive program of regulatory and market mechanisms to achieve quantifiable reductions of GHG. The California Air Resources Board (CARB) is the primary state agency responsible for developing and maintaining a statewide inventory of GHG emissions and for formulating plans and action steps to reduce current GHG emissions statewide to 1990 GHG emission levels by the year 2020. The 2020 goal was ultimately achieved in 2016 – four years ahead of schedule. AB 32 defines *GHGs* as CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, and nitrogen trifluoride (NF_3).[3]

On June 30, 2009, California was granted a Clean Air Act waiver (42 U.S.C. §7543(a)) from EPA to regulate automotive tailpipe CO_2 emissions. CARB issued regulations requiring a 17 percent reduction in GHG emissions from light-duty vehicles by 2020, and a 25 percent reduction by 2030. After adopting these initial GHG standards for passenger vehicles, CARB adopted continued standards for future model years.

In December 2009, CARB promulgated low carbon fuel standards in order to reduce the carbon intensity of transportation fuels used in California (i.e., gasoline, compressed natural gas, ethanol, liquefied natural gas, hydrogen, diesel, biodiesel, and electricity). It is expected that the low carbon fuel standards will reduce carbon intensity from the use of such fuels by an average of 10 percent per year. Carbon intensity is a measure of the GHG emissions associated with the combination of all the steps in the "lifecycle" of a transportation fuel.

Senate Bill 97 – CEQA Guidelines for Greenhouse Gas Emissions

The Legislature also adopted Senate Bill (SB) 97 in 2007. Under SB 97, the State Office of Planning and Research (OPR) is required to develop California Environmentally Quality Act (CEQA) guidelines "for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions as required by this division." (Public Resources Code Section 21083.05(a))

Executive Order B-30-15 – Updated GHG Reduction Target

On April 20, 2015, Governor Brown signed SB 32 and AB 197, which served to extend California's GHG reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below the AB 32 goal of 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by Executive Order (EO) B-30-15 for 2030, which set the

[3] Nitrogen trifluoride was not listed initially in AB 32 but was subsequently added to the list via legislation. AB 32 Global Warming Solutions Act of 2006.

next interim step in the state's continuing efforts to pursue the long-term target of 80 percent below 1990 emissions levels by 2050.

SB 32 is contingent upon AB 197, which amended Section 9147.10, Section 38562.5, and Section 38562.7 of the Health and Safety Code. Section 9147.10 establishes a six-member Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the Legislature. CARB is required to appear before this committee annually to present information on GHG emissions, criteria pollutants, and toxic air contaminants from sectors covered by the Scoping Plan prepared by CARB. Section 38562.5 requires that CARB consider social cost when adopting rules and regulations to achieve emissions reductions and prioritize reductions at large *stationary sources* and from *mobile sources*. Section 38562.7 requires that each Scoping Plan update identify the range of projected GHG and air pollution reductions and the cost-effectiveness of each emissions reduction measure.

Executive Order B-55-18 – Carbon Neutrality

EO B-55-18 calls for California to achieve carbon neutrality by 2045 and achieve and maintain net negative GHG emissions thereafter. These targets are in line with the scientifically established levels needed in the United States to limit the rise in global temperature to no more than 2°C, the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected. The Proposed Scenario in the 2022 CARB Scoping Plan lays out a path not just to carbon neutrality by 2045 but also to an ambitious 2030 GHG emissions reduction target. The modeling indicates that, if the plan described in the Proposed Scenario is fully implemented, and done so on schedule, the State is on track to reduce emissions to 260 million metric tons by 2030.

Amendments to Section 15064.4 of the CEQA Guidelines for Determining the Significance of Impacts from Greenhouse Gas Emissions (December 2018)

The Natural Resources Agency added Section 15064.4 to the State CEQA Guidelines in 2010 as part of a package of amendments addressing GHG emissions, as directed by SB 97. The purpose of Section 15064.4 is to assist lead agencies in determining the significance of a project's GHG emissions on the environment. Amendments to Section 15064.4 were adopted and became effective on December 28, 2018 (2018 CEQA Guideline amendments). In addition, OPR developed a technical advisory in 2018 entitled "Discussion Draft on CEQA and Climate change Advisory," to address some common issues and topics that arise in greenhouse gas emissions analyses under CEQA in consideration of the 2018 amendments to Section 15064.5 of the CEQA Guidelines. OPR's 2018 technical advisory includes detailed discussions on establishing an appropriate methodology for project analysis, approaches for determining significance thresholds, impact mitigation, streamlining GHG emissions analysis for transportation related projects, and suggestions for digital tools that could help quantify or analyze GHG emissions. The 2018 technical advisory is available online through the OPR website.

4.1.3 Agencies in Ventura County

Ventura County Air Pollution Control District

Following updates to the ISAGs in 2011, the Ventura County Air Pollution Control District (VCAPCD) published a report entitled "Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County" (VCAPCD Report). The VCAPCD Report explored 14 different programmatic thresholds based on variations of a no threshold approach, a zero-threshold

approach, or a non-zero approach. The VCAPCD Report further concluded that it would continue to explore options for GHG thresholds in Ventura County "with preference for GHG threshold consistency with the South Coast Air Quality Management District (SCAQMD) and the Southern California Association of Governments (SCAG) region" due to it being part of SCAG and SCAQMD being the largest *adjacent* air district.

Ventura County Regional Energy Alliance

The Ventura County Regional Energy Alliance (VCREA) is a joint powers authority with representation from local governments, schools, and special districts. In 2015, VCREA prepared an integrated community inventory of GHG emissions both regionally and for each of its local government member organizations consistent with CARB's approach for evaluating GHG inventories. The most recent version of the community inventory was published by VCREA in December 2015 and reported emissions for calendar years 2010–2012. The VCREA inventory also provided specific community emissions inventories by government jurisdictions in Ventura County. For the unincorporated area of Ventura County, GHG emissions were approximately 1.3 million *metric tons of carbon dioxide equivalent (MTCO$_2$e)* in 2012 and 1.9 million *MTCO$_2$e* in 2015. Details of the VCREA inventory and additional information on statewide, regional, and local initiatives to reduce GHG emissions can be found in Section 12.1 of the Ventura County General Plan Background Report.

4.2 IMPACT ANALYSIS

Guidance on addressing the question from the Initial Study Checklist is provided below. The level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project generate greenhouse gas emissions, either directly or indirectly, which would result in a significant impact on the environment?

Given that climate change from GHG emissions is a global phenomenon, the primary CEQA concern with GHG emissions is the cumulative impact of a project's incremental GHG emissions when viewed in connection to other past, present, and reasonably foreseeable probable future project GHG emissions. In determining the significance of a project's GHG emissions, the *Lead Agency* should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national, or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. The *Lead Agency* should consider the following factors, among others, when determining the significance of impacts from GHG emissions on the environment:

- The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; and
- Whether the project emissions exceed a GHG emissions threshold that the *Lead Agency* determines applies to the project, as explained below.

The County of Ventura has not adopted a GHG emissions threshold for purposes of CEQA. Pursuant to CEQA Guidelines Section 15064.7(c), the *Lead Agency* may consider GHG emissions thresholds previously adopted or recommended by other public agencies or recommended by experts, as long

as the decision of the *Lead Agency* to consider such thresholds with which to evaluate the project is supported by *substantial evidence*.

The VCAPCD currently evaluates project GHG emissions according to the GHG emissions thresholds recommended by the South Coast Air Quality Management District (SCAQMD). The project applicant, in consultation with the *Lead Agency* and VCAPCD, should determine whether the GHG emissions thresholds recommended by the SCAQMD could be applied, including any necessary modifications to consider factors that are unique to Ventura County, to analyze the project's GHG emissions. Should the *Lead Agency*, in consultation with VCAPCD, determine that the emissions thresholds recommended by SCAQMD would not be suitable for evaluating the project, the *Lead Agency* shall provide *substantial evidence* for the use of another agency's emissions thresholds to evaluate the project.

GHG emissions from industrial facilities are considered significant by SCAQMD if they exceed 10,000 $MTCO_2e$ per year. SCAQMD has also recommended a lower numerical threshold of 3,000 $MTCO_2e$ per year for residential and commercial projects, although this threshold has not been adopted.

The County of Ventura developed an integrated approach to addressing climate change in the adopted General Plan by incorporating policies and programs that address climate change throughout the General Plan elements, such that the General Plan serves as the County's Climate Action Plan (CAP). Although the CAP (as adopted in 2020) contains policies and programs aimed at reducing GHG emissions consistent with state reduction goals, the County would fall short of meeting state 2030 reduction targets and beyond. Thus, the CAP is not a qualified plan pursuant to CEQA Guidelines Section 15183.5(b) and project-level analysis of GHG emissions should not be tiered from the CAP.

4.3 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines: Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
2022 CARB Scoping Plan	California Air Resources Board	PDF | Website
California Global Warming Solutions Act of 2006 (AB32)	California Air Resources Board	Website
California Global Warming Solutions Act of 2006 (SB32)	California Air Resources Board	Website

Source	Managing Agency/Organization	Online Access
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation (LCI), formerly Office of Planning and Research	Website
CEQA Guidelines for Greenhouse Gas Emissions (SB97)	LCI	Website
Executive Order B-55-18	LCI	Website
GHG emissions standards for passenger cars and light trucks	U.S. Environmental Protection Agency	Website
Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County	Ventura County Air Pollution Control District	Website
HFCs and the AIM Act	U.S. Environmental Protection Agency	Website
New Source Performance Standards for GHG emissions for new fossil fuel-fired utility boilers and natural gas-fired stationary combustion turbines (2015)	U.S. Environmental Protection Agency	Website
New Source Performance Standards for Municipal Solid Waste Landfills (2016)	U.S. Environmental Protection Agency	Website
SCAQMD GHG Significance Thresholds	South Coast Air Quality Management District	Website
State Air Resources Board: greenhouse gases: regulations (AB 197)	California Air Resources Board	Website
Ventura County General Plan, Appendix B, Climate Action Plan (CAP)	County of Ventura	PDF | Website
Ventura County General Plan Background Report, Chapter 12	Ventura County RMA Planning Division	PDF | Website

5. Energy

5.1 BACKGROUND AND CONTEXT

The California Environmental Quality Act (CEQA) requires evaluation of a project's potential energy use-related impacts and for ways in which the project could reduce unnecessary energy consumption, such as increasing its efficiency and use of *renewable energy*. This issue is addressed in Appendix F of the State CEQA Guidelines which states, in part, that: "The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include: (1) decreasing overall per capita energy consumption, (2) decreasing reliance on fossil fuels such as coal, natural gas, and oil; and (3) increasing reliance on *renewable energy* sources."

5.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

ENE-1 A project may have a significant impact if it would result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation.

ENE-2 A project may have a significant impact if it would a) conflict with or obstruct a state or local plan for *renewable energy* or energy efficiency and b) result in a significant adverse environmental effect due to that conflict.

5.3 IMPACT ANALYSIS

A project applicant must provide sufficient information to enable a determination of whether the project's energy use could have a significant impact based on the thresholds identified in Section 5.2, which should also guide the development of *feasible* mitigation measures as needed. Guidance on addressing the questions from the Initial Study Checklist are provided below. Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 5.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction Energy Usage

The project applicant shall be responsible for evaluating the project's construction energy consumption to demonstrate whether the project would result in wasteful, inefficient, or unnecessary consumption of energy resources. Most construction-related energy consumption

would result from the operation of construction equipment and vehicle trips associated with commutes by construction workers and haul trucks supplying and removing materials.

Operational Energy Usage

The project applicant shall be responsible for evaluating the project's operational energy consumption to demonstrate whether the project would result in wasteful, inefficient, or unnecessary consumption of energy resources. This shall be done by comparing anticipated energy consumption at build-out to project baseline conditions. Depending on the type of project, the total energy consumption or per capita consumption, or both, may be needed to demonstrate whether the project would result in wasteful, inefficient, or unnecessary consumption of energy resources. The applicant may consult a subject matter expert in coordination with the *Lead Agency* to determine the scope of analysis appropriate for the project to calculate total energy consumption and/or per capita consumption.

A determination that a building will meet or exceed the California Building Energy Efficiency Standards contained in the Building Code at title 24 of the California Code of Regulations, and any locally adopted amendments to the code, shall provide a presumption that the building's energy use impacts will not be significant.

Preparation of Checklist

The following information should be used to complete the Checklist:

A determination of **Less Than Significant Impact (LS)** shall be made if the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made if the project would result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. However, impacts can be reduced to a less than significant level by project redesign or other measures.

A determination of **Potentially Significant (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project has the potential to result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation.

(b) Would the project 1) conflict with or obstruct a state or local plan for renewable energy or energy efficiency and 2) result in a significant adverse environmental effect due to that conflict?

The project shall be evaluated for consistency with the following state and/or local plans for *renewable energy* or energy efficiency:

Integrated Energy Policy Report

The California Energy Commission prepares the Integrated Energy Policy Report biannually, which contains policy recommendations to conserve resources, protect the environment, ensure reliable, secure, and diverse energy supplies, enhance the state's economy, and protect public health and safety. Reports can be accessed online.

California Renewables Portfolio Standard Program

The Renewables Portfolio Standard (RPS) is one of California's key programs for advancing *renewable energy*. The program sets continuously escalating *renewable energy* procurement requirements for the state's load-serving entities. The current RPS targets, revised in 2018 under Senate Bill 100, require that electric utilities provide 44 percent of retail sales from *renewable energy* sources by December 31, 2024, 50 percent by December 31, 2026, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. SB 100 also introduced a requirement that 100 percent of retail sales of electricity come from zero-carbon energy sources by December 31, 2045.

Building Energy Efficiency Standards

The energy consumption of new residential and nonresidential buildings in California is regulated by the State's Title 24, Part 6, Building Energy Efficiency Standards, which serve to reduce wasteful, uneconomical, and unnecessary uses of energy for the state. They include requirements in the Energy Code (Title 24, Part 6) and voluntary energy efficiency provisions in CALGreen (Title 24, Part 11). The Building Energy Efficiency Standards are updated every three years and are enforced through incorporation into the Ventura County Building Code.

Ventura County General Plan

The General Plan contains several policies and programs that support energy conservation and efficiency consistent with state requirements. Refer to Section 6.7 (Energy Resource Conservation) of the Conservation and Open Space Element for goals and policies related to energy conservation and efficiency. Appendix B (Climate Change) includes a compilation of General Plan programs related to energy consumption, conservation, and efficiency.

Preparation of Checklist

The following information should be used to complete the Checklist:

A determination of **Less Than Significant Impact (LS)** shall be made if the project is consistent with all applicable plans and standards as stated above.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made if the project has the potential to result in significant impacts due to a conflict with the plans and standards as stated above. However, impacts can be reduced to a less than significant level by project redesign or other measures.

A determination of **Potentially Significant (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project has the potential to result in significant impacts due to a conflict with the plans and standards as stated above, and an EIR shall be prepared.

5.4 ENERGY ANALYSIS IN ENVIRONMENTAL IMPACT REPORTS

Appendix F of the CEQA Guidelines states that, in order to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered in an EIR, to the extent relevant and applicable to the project. Appendix F further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and

applicable, in the Project Description, Environmental Setting and Impact Analysis portions of technical sections, as well as through mitigation measures and alternatives.

To comply with this EIR requirement, the project applicant is responsible for conducting an energy analysis consistent with CEQA Guidelines Section 15126.2(b) to evaluate the project's energy use for all project phases and components, including transportation-related energy, during construction and operation. This analysis may be included in related analyses of air quality, greenhouse gas emissions, transportation or utilities at the discretion of the *Lead Agency*. In addition to building code compliance, other relevant considerations should include, among others, the project's size, location, orientation, equipment use and any *renewable energy* features that could be incorporated into the project.[4] Pursuant to CEQA Guidelines section 15126.2(b), this analysis is subject to the rule of reason governing potential project alternatives as defined in CEQA Guidelines section 15126.6(f), and shall focus on energy use that is caused by the project.

As noted in Appendix F, a separate project-specific energy analysis may not be necessary in circumstances where an energy source serving the project has already undergone environmental review that adequately analyzed and mitigated the effects of the energy production.

5.5 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines: Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
California Building Energy Efficiency Standards	California Energy Commission	Website
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
California Renewables Portfolio Standard Program: emissions of greenhouse gases (SB 100)	California Energy Commission	Website
Integrated Energy Policy Report	California Energy Commission	Website
Renewables Portfolio Standards (RPS)	California Energy Commission	Website

[4] See *League to Save Lake Tahoe Mountain Area Preservation Foundation v. County of Placer* (2022) 75 Cal.App.5th 63, 164, "an [Environmental Impact Report's] analysis of a project's impacts on energy resources must include a discussion of whether the project could increase its reliance on *renewable energy* sources to meet its energy demand as part of determining whether the project's energy impacts are significant."

Source	Managing Agency/Organization	Online Access
Ventura County Building Code (2022)	Ventura County RMA Building and Safety Division	PDF | Website
Ventura County General Plan, Appendix B, Climate Action Plan	Ventura County RMA Planning Division	PDF | Website
Ventura County General Plan, Conservation and Open Space Element	Ventura County RMA Planning Division	PDF | Website

6. Biological Resources

6.1 BACKGROUND AND CONTEXT

Biological resources include plant and animal species and their habitats, plant communities and ecosystems. A preliminary assessment (see Section 6.3) and, if necessary, an *Initial Study Biological Assessment (ISBA)*, or *Coastal Initial Study Biological Assessment (CISBA*) (see Sections 6.3.4) shall be conducted prior to assessing impacts to *sensitive biological resources* in accordance with the thresholds of significance specified in Section 6.2 below.

6.1.1 Sensitive Biological Resources in the Non-Coastal Zone

Projects in the non-coastal zone that may have a significant impact on *sensitive biological resources* must be reviewed pursuant to the California Environmental Quality Act (CEQA). The thresholds of significance and process guidance shall be followed to ensure environmental review of biological resources in the non-coastal zone is consistent with CEQA.

6.1.2 Sensitive Biological Resources in the Coastal Zone

Environmentally Sensitive Habitat Areas (ESHA) in the coastal zone are protected under the California Coastal Act against any significant disruption of habitat values, and only uses dependent on those natural resources are generally allowed within those areas. In addition, development in areas adjacent to *ESHA* (including parks/recreation areas) are required to be sited and designed to prevent *indirect impacts* and be compatible with the continuance of habitat (or those parks/recreation) in these areas.

In September 2022, the California Coastal Commission ("Commission") certified a comprehensive set of amendments to the Ventura County Local Coastal Program (LCP) related to *ESHA* and other *sensitive biological resources* within the coastal zone. The certified amendments updated definitions, identified development standards, clarified compensatory mitigation requirements, and established permit approval findings for projects that could adversely impact those resources.

The Ventura County LCP was certified by the Commission pursuant to Public Resources Code (PRC) Section 21080.9, which exempts local governments from the requirement of preparing an environmental impact report (EIR) in connection with its activities and approvals necessary for the preparation and adoption of a local coastal program, and authorizes the Commission to certify the LCP as a plan for use in the Commission's regulatory program pursuant to PRC Section 21080.5. The Commission's review and approval of LCPs, including the Ventura County LCP, have been found by the Natural Resources Agency to be functionally equivalent to the EIR process under PRC Section 21080.5.

Pursuant to State CEQA Guidelines Section 15183, a project may be exempt from further environmental review if it is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified, except where necessary to examine whether a project could have significant effects which are peculiar to the project or its site (see Section 4.7.2 of the Ventura County CEQA Implementation Manual). Given that the Ventura County LCP was certified by the Commission pursuant to PRC Section 21080.9, State CEQA

Guidelines Section 15183 may be particularly suited for a project that may otherwise be exempt from CEQA, but which may have the potential to have an adverse impact on *ESHA* and other *sensitive biological resources* in the coastal zone.

If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR (the Commission's functionally equivalent analysis), or can be substantially mitigated by the imposition of uniformly applied development policies or standards (e.g., the LCP policies on *ESHA* and other *sensitive biological resources*), then an additional EIR or Mitigated Negative Declaration (MND) need not be prepared for the project solely on the basis of that impact.

6.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

BIO-1 A project may have a significant impact on a plant or animal species if it would result in one or more of the following (see Section 6.4.1 for additional guidance):

a. Reduces the population of a *special-status species* through any of the following ways, causing the population to decline substantially or drop below self-sustaining levels:

- Loss of one or more individuals, occupied habitat or critical habitat designated by the U.S. Fish and Wildlife Service (USFWS) of a species officially listed as *endangered, rare, or threatened,* a *candidate species*, or a *fully protected species.*
- Impacts that would eliminate or threaten to eliminate one or more *element occurrences* of a *special-status species* not otherwise listed under the federal Endangered Species Act or California Endangered Species Act, or as a *candidate species* or *fully protected species.*
- "Take" of birds protected under the California Fish and Game Code (Sections 3503.5, 3511, and 3513) and the federal Migratory Bird Treaty Act, as "take" is defined in the Fish and Game Code and the Migratory Bird Treaty Act.
- Substantial reduction in the habitat of a *special-status species*.

b. Threatens the viability of the habitat of a *special-status species* through impacts associated with construction, operational, and/or maintenance activities.

c. Isolates or restricts a *special-status species* from resources necessary for its reproductive capacity or survival.

d. Fragments a habitat and/or critical ecosystem processes and functions of a *special-status species.*

BIO-2 A project may have a significant impact on *sensitive plant communities* if it would result in one or more of the following (see Section 6.4.2 for additional guidance):

a. Change in density or intensity of land use and/or involves pre-construction or construction activities; demolition activities; operational activities; maintenance; decommissioning activities; grading, excavation, vegetation removal; discharge of pollutants into the environment; the placement of fill and/or other substrates,

structures, or other materials; and/or any disturbance of the substratum that would temporarily or permanently remove, or impact the health of *sensitive plant communities*.

b. Impacts to the aquatic resources within the watershed that would substantially adversely affect the associated *sensitive plant communities* of a *water or wetland*, including any *locally important plant communities*.

BIO-3 A project may have a significant impact on *waters and/or wetlands* if it would result in one or more of the following (see Section 6.4.3 for additional guidance):

a. Change in density or intensity of land use that results in the degradation or removal of habitat, including, but is not limited to:

- subdivisions (commencing with Government Code Section 66410), and any other division of land, including lot splits;
- pre-construction, construction, operational, maintenance, demolition, decommissioning activities; or
- grading, excavation, or vegetation removal;

b. Discharge of pollutants into the environment;

c. Placement of fill and/or other substrates, structures, or other materials that include any gaseous, liquid, solid, or thermal waste;

d. Any disturbance of the substratum such as dredging, mining, or extraction of any materials;

e. Substantial changes in the hydrological conditions associated with water quality, water quantity, water input, and/or intensity of use, or of access thereto; velocity, siltation and/or sediment (erosion), volume of flow, or runoff rate; and/or the obstruction or diversion of water flow; release of pollutants into the environment; or alteration of ambient water temperatures; or

f. Disruptions to *water or wetland* ecosystems that would isolate or substantially interrupt the ecosystem function between the aquatic and the associated terrestrial habitats.

BIO-4 A project may have a significant impact on a *habitat connectivity corridor* or the *landscape connectivity* for a native resident and/or migratory species and its habitat needed for reproduction if it would result in one or more of the following (see Section 6.4.4 for additional guidance):

a. Substantially block, inhibit, impede, interfere, isolate, remove, and/or degrade a *habitat connectivity corridor* or *regional landscape linkage* within the project parcel and/or neighboring parcels, as well as the *Critical Wildlife Passage Area (CWPA)*, if applicable.

b. Create physical barriers that substantially block and/or impede the movement, migration, or long- term *landscape connectivity* of the species.

c. Intimidate the species due to a substantial increase in human and/or domestic animal access, noise, light, waste, wildlife attractants, or other *human-wildlife conflicts*, and/or the introduction of pests or exotic species that would substantially prevent, interfere, or alter the movements, and/or threaten the use of habitat needed for reproduction and survival.

d. Substantially isolate or fragment species habitat and/or critical ecosystem processes such as, but not limited to, food webs (e.g., energy flow, decomposition, nutrient cycling), reproductive mechanisms, or ecological functions.

BIO-5 A project may have a significant impact if it would conflict with one or more of the following plans, policies or ordinance provisions and result in a significant adverse environmental effect due to that conflict (see Section 6.4.5 for additional guidance):

a. The biological resources protection policies or standards in the Ventura County General Plan, Non-Coastal Zoning Ordinance, and/or Coastal Zoning Ordinance; or

b. An approved local, regional, or state habitat or community conservation plan.

6.3 PRELIMINARY ASSESSMENT

The *Lead Agency* shall determine whether project impacts may have a significant impact based on the thresholds of significance in Section 6.2 and identify project revisions and/or mitigation measures that would avoid or reduce any potentially significant impacts on biological resources. The preliminary assessment of the project shall be completed by the *Lead Agency* in consultation with its *qualified biologist* using available mapped biological resource data and aerial imagery (see Section 6.3.3) to determine whether the proposed project activities and uses have the potential to impact *sensitive biological resources* in the defined impact area.

If the *Lead Agency* determines, in consultation with its *qualified biologist*, based on the preliminary assessment, that there are no *sensitive biological resources* within the project's defined impact area (see Section 6.3.2) and/or the project activities (see Section 6.3.1) could not have a significant impact to the *sensitive biological resources* located in the defined impact area, then the project's impact will be less than significant and no additional assessment is required.

If the *Lead Agency* determines, in consultation with its *qualified biologist*, based on the preliminary assessment, that *sensitive biological resources* are present within the defined impact area, then the *Lead Agency* shall determine whether:

a. The project clearly has no potential to impact biological resources;

b. The project has the potential to impact biological resources but project revisions and/or mitigation measures can be adopted and implemented to avoid or reduce those impacts to a less than significant level without the need for an *ISBA*; or

c. The project has the potential to impact biological resources and an *ISBA* is required to assess the impacts and identify project revisions and/or mitigation measures to avoid or reduce the impacts.

6.3.1 Proposed Project Activities and Uses

Review the project's activities, uses and *development envelope*. The project description shall describe any changes in the density or intensity of land use, and/or pre-construction or construction activities; demolition activities; operational activities; maintenance; decommissioning activities; grading, excavation, vegetation removal; discharge of pollutants into the environment; the placement of fill and/or other substrates, structures, or other materials; and/or any disturbance of the substratum. Ensure that all plans accurately reflect the project description and the limits of the *development envelope* and verify actual conditions in the field. For proposed larger or long-term

construction projects (e.g., installation of utilities, public works improvement projects, subdivisions, etc.), or projects located in federally, state, or locally designated *sensitive biological resource* areas (e.g., *CWPAs*, USFWS critical habitat, *waters and/or wetlands,* etc.), the type of heavy or noisy equipment involved and a general timeline of the proposed development stages and activities shall also be provided.

6.3.2 Define the Impact Area

The project's impact area includes areas with biological resources that will be impacted by the project. See Section 1.4.3 for additional guidance on *direct impacts* and *indirect impacts*. Areas of *direct impact* include, but are not limited to, the *development envelope* and proposed activities such as vegetation trimming or removal, grading, and construction. *Indirect impacts* may extend beyond the *development envelope* or area of *direct impact,* and may include project-related changes to the environment such as light, noise, water, soil, or air pollution; habitat fragmentation and degradation of ecosystem processes; or increased *human-wildlife conflicts*. The extent of *indirect impacts* varies depending on the biological resources present in the surrounding area, the type of project proposed, level of development intensity, and the anticipated human activities resulting from the project.

Cumulative impacts consist of both *direct* and *indirect impacts* of the project in conjunction with impacts from past, present and reasonably foreseeable probable future projects. The extent of cumulative impacts may vary depending on the location of the project, type of biological resource being examined (e.g., species, plant community, habitat, watershed, *landscape connectivity, habitat connectivity corridor, regional landscape linkages,* policy conflicts), impact type, and County policies. The *Lead Agency* shall determine, in consultation with its *qualified biologist*, the extent of cumulative impacts based on these considerations.

A project would have a "cumulatively considerable" impact if the incremental impact of the project is significant when viewed in connection with the impacts of past, present, and reasonably foreseeable probable future projects. See Section 1.4.4 for additional guidance on cumulative impacts and further discussion in Section 6.4 for cumulative impacts on biological resources.

6.3.3 Preliminary Data Review

To determine whether a field survey or *ISBA* is necessary to evaluate the potential for biological impacts, the *Lead Agency* and its *qualified biologist* shall review aerial imagery and other relevant biological geographic information system (GIS) data layers such as, but not limited to, the California Department of Fish and Wildlife's (CDFW) Biogeographic Information Observation System (BIOS) and the California Natural Diversity Database (CNDDB), the County's habitat connectivity data, and the *locally important species* lists maintained by the Ventura County Resource Management Agency (RMA) Planning Division. The Ventura County RMA Planning Division also maintains a list of databases and resources that can be used to review existing data.

The Ventura County RMA Planning Division administers the *locally important species* program. The RMA Planning Division provides United States Geological Survey (USGS) quadrangle maps of historic *locally important species* locations in Ventura County and additional life history information to help streamline data needs for applicants and consultants. Every three years, the RMA Planning Division solicits recommendations for additions to and removals from the *locally important species* lists from biologists with expertise regarding the biological resources of Ventura County (e.g., state and federal agencies, universities, *qualified biologists*) in accordance with the criteria for *locally important species*. The RMA Planning Division will circulate any proposed changes to the *locally important species* lists among a team of experienced botanists/biologists with the expertise and knowledge of

Ventura County's diverse flora and fauna, as well as to the public for review and comment. If evidence supports the changes to the lists, the lists will be updated accordingly.

Because biological resources are variable, dynamic, and adaptable, a site visit conducted by the *Lead Agency's qualified biologist* is often required during the preliminary assessment to determine the presence of *special-status species* that cannot be detected through aerial photos or other available spatial data sets. The preliminary assessment field survey shall be conducted in accordance with the *ISBA/CISBA* standards to closely investigate areas of potential biological sensitivity found from the data search and aerial photo interpretation.

6.3.4 ISBA Determinations

Projects in the Coastal Zone

Projects that are located within, partially within, or adjacent to the coastal zone are subject to the LCP policies on *ESHA* and other *sensitive biological resources*. The *Lead Agency* shall review Section 6.1.2 and determine, in consultation with its *qualified biologist*, whether further environmental review of *ESHA* and other *sensitive biological resources* within the coastal zone is warranted. If further environmental review is necessary, the biological resource assessment that is required is a *CISBA*. Standards for conducting a *CISBA* are found in Section 8178-2.2 of the Ventura County Coastal Zoning Ordinance.

Projects in the Non-Coastal Zone

For development located in the non-coastal zone, the *Lead Agency*, in consultation with its *qualified biologist*, shall determine whether an *ISBA* is required to evaluate potential impacts to biological resources.

Examples of project types that are not otherwise an exempt project pursuant to CEQA which may not require an *ISBA* may include, but are not limited to:

- Remodeling an existing structure that does not extend past the existing structure footprint.
- Additions to existing structures that are within a previously permitted graded pad area or, if there is no graded pad, an existing permitted developed/landscaped area, if additional fuel modification is not required and there is no new wildlife impermeable fencing.
- Demolition of an existing permitted structure and construction of a new structure within the same existing building pad area where no additional fuel modification is required and there is no new wildlife impermeable fencing.
- New structures and landscaping proposed within a permitted graded pad or, if there is no graded pad, a *development envelope*, authorized in a previously approved land use permit.
- Projects that occur in previously continuously disturbed developed areas, if additional vegetation removal is not required, there is no wildlife impermeable fencing, and the use would not impact surrounding natural areas.
- Projects on land consisting of non-native grasslands totaling less than one acre that are completely surrounded by existing urban development (such as urban infill lots).

If the project falls within any of the categories listed above, then the *Lead Agency* shall consult with its *qualified biologist* to verify that an *ISBA* would not be required, and to determine whether standard project conditions could be imposed on the project to avoid or reduce potential impacts to a less

than significant level without conducting an *ISBA*, such as a standard condition to protect nesting migratory birds that may occur within the defined impact area. If the project may adversely affect *sensitive biological resources*, then a *qualified biologist* retained by the project applicant shall prepare an *ISBA* to assess and recommend measures to mitigate the adverse impacts of the project. Refer to the "Standards for Initial Study Biological Assessments" document prepared by the Ventura County RMA Planning Division for guidance on conducting an *ISBA* and preparing an *ISBA* report (see Section 6.7).

6.4 PROJECT IMPACT ANALYSIS

The project impact analysis shall discuss, describe, and quantify each identified impact for every *sensitive biological resource* detected within the defined impact area. The discussion of each impact shall provide substantial evidence pursuant to State CEQA Guidelines Section 15384 which include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts, to support the determination of significance (e.g., no impact, less than significant, less than significant with mitigation incorporated, potentially significant).

For oak woodlands, the publication "Oak Woodland Impact Decision Matrix" on the Ventura County RMA Planning Division website (see Section 6.7) can be used as a guidance document for determining whether a project's impacts should be considered significant with regard to oak woodlands pursuant to PRC Section 21083.4.

If the *ISBA* finds potential impacts to any biological resources under the jurisdiction of federal, state, or other local agency the *Lead Agency* shall consult with the applicable agency regarding any additional protocol surveys, potential mitigation required, and additional permitting requirements. The extent of a project's adverse impacts on a specific biological resource can vary greatly depending on, but not limited to the types of ecosystems present, the amount of historic and potential disturbance on and nearby the site, or the anticipated human activities resulting from the project. The following guidance shall be considered when determining the significance of impacts on *sensitive biological resources*:

6.4.1 Species

The determination of whether a project's impact is significant shall be based on both the current conservation status of the species affected and the severity or intensity of impact caused by the project.

A project may be considered to have a significant impact on a *special-status species* if it would result in one or more of the following:

a. Injury, mortality, destruction, and/or the loss/degradation of the habitat of a *special-status species* as outlined in Threshold BIO-1.

b. A substantial increase in *human-wildlife conflicts* resulting from construction, operational, and/or maintenance activities which would result in mortality and/or the reduced fitness of the affected species over time. Examples include, but are not limited to:

   - Loose or unsecured openings in structures which may lead to inadvertent trapping or harboring of wildlife.

- Inadequate staging, storage, or disposal areas for food, garbage, micro-trash, or other waste products.
- Use of rodenticides.
- Increases in human access, predation or competition from domestic animals, pests, or exotic species. This would also include proposed animal keeping activities without providing adequate protection from predatory wildlife that may result in the issuance of depredation permits for *special-status species*.
- Increases in noise and/or nighttime lighting to an excessive level above ambient levels.

Cumulative Impacts for Special-Status Species

Determine the local population of each individual *special-status species* within the defined cumulative impact area by considering the range, sub-range, or population distribution for each *special-status species*. Summarize the impacts on the *special-status species* associated with other past, present, and reasonably foreseeable probable projects within the cumulative impact area.

6.4.2 Ecological Communities

The determination of whether a project's impact is significant shall be based on both the current conservation status of the plant community and the severity or intensity of impact caused by the project.

Cumulative Impacts for Sensitive Plant Communities

The cumulative impacts on *sensitive plant communities* are dependent upon the type of plant community and the distribution of the plant community population. Ensure that the cumulative analysis for *sensitive plant communities* include recently approved, present, and reasonably foreseeable probable future projects that may impact the *sensitive plant community* that was evaluated for project impacts. If you require guidance regarding defining the cumulative impact area for *sensitive plant communities*, contact the appropriate regional staff person through the local CDFW Regional Office.

6.4.3 Waters and/or Wetlands

An analysis of potential project impacts on *waters and/or wetlands* shall examine the impacts to the entire *water and/or wetland* ecosystem. *Waters and/or wetlands* depend on a source of water, and therefore impacts to the quality, supply, flow rate, or timing of that water source can adversely impact both.

A project may be considered to have a significant impact on *waters and/or wetlands* if it would result in one or more of the following:

a. Substantial disruptions to *waters and/or wetlands* and their associated plant communities that would substantially isolate or interrupt contiguous habitats, block seed dispersal routes, or increase vulnerability of *water and/or wetland* species to exotic weed invasion or local extirpation. An example would be the clearance or disruption of adjacent upland vegetation to a level that would adversely affect the ecological function of the *water and/or wetland* where such vegetation plays a critical role in supporting dependent wildlife species, or where such vegetation aids in stabilizing steep slopes adjacent to the *waters and/or wetlands*, which reduces erosion and sedimentation potential.

b. Substantial interference with hydrological conditions in a *water and/or wetland*. Adverse hydrological changes may include altered freshwater input 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.

c. Inadequate buffer for protecting the functions and values of existing *waters and/or wetlands*. The buffer is measured from the top-of-bank or edge of the *water and/or wetland* or its associated terrestrial vegetation, whichever is greater. General Plan Policy COS-1.11 requires a minimum buffer of 100 feet from a significant wetland habitat. In accordance with this policy, buffer areas may be increased or decreased upon an evaluation and recommendation by a *qualified biologist* based on factors that include soil type, slope stability, drainage patterns, the potential for discharges that may impair water quality, presence or absence of *endangered, rare, or threatened species*, impacts to wildlife movement, and compatibility of the proposed development with use of the wetland habitat area by wildlife.

Cumulative Impacts for Waters and/or Wetlands

Due to the cumulative loss of *waters and/or wetlands* in the county and state, a significant project impact to *waters and/or wetlands* is also considered a cumulatively considerable impact. Such significant impacts to *water and/or wetland* habitats shall be avoided or mitigated to a less than significant level, if feasible, or to substantially lessen the project's significant impacts. In addition, according to General Plan Policy COS-1.11, discretionary development that would have a significant impact on a *water and/or wetland* habitat within a designated Existing Community may be approved in conjunction with the adoption of a statement of overriding considerations.

6.4.4 Landscape Connectivity

The *qualified biologist* must define the distinct geographical and temporal scales pursuant to General Plan Policy COS-1.4 that capture the project's *direct*, *indirect,* and cumulative impacts on *landscape connectivity* for the native and/or migratory representative species and their representative functional group that would impact their reproduction and survival within the *regional landscape linkage*.

The following impacts on the *landscape connectivity* of native and migratory species reproduction and survival may be considered potentially significant if it would result in one or more of the following:

a. Substantially prevent, interfere, and/or endanger the reproduction, survival, and/or movement of affected native resident and/or migratory species in one or more of the following ways:

   - Create a barrier within a *habitat connectivity corridor, CWPA, or regional landscape linkage* that substantially blocks and/or impedes the movement, migration, and/or long-term *landscape connectivity* of the native resident and/or migratory species. Examples may include, but not limited to, development placed at or near a wildlife undercrossing structure that would impede wildlife movement through the structure; or unmitigated noise or lighting impacts that prevents or interferes with wildlife movement within a *CWPA*.

- Reduce and/or degrade the *landscape connectivity* of a *habitat patch*, *habitat connectivity corridor*, *CWPA, or regional landscape linkage* to less than the sufficient width, length, and/or size needed for the survival or reproduction of each species' functional group. The adequacy of the width, length, and/or size shall be based on the biological information collected during the data review for the *ISBA*.
- Divert wildlife to use routes that endanger their survival. For example, constraining a *habitat connectivity feature* 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 adjacent to the property.
- Visual continuity (i.e., lines-of-sight) is not maintained across highly constrained *habitat connectivity corridor* features, such as a crossing structures and/or *stepping stones* for species relying on visual cues for movement.
- Intimidation of a species and/or degradation of habitat due to impacts that include but are not limited to noise, light domestic animal access; fragmentation of *habitat patches*; competition for resources through the introduction of invasive /exotic species, waste, and other predator attractants.

b. Sever, fragment, and/or inhibit the *landscape connectivity* for species to move between *core habitat areas, habitat connectivity corridors, CWPAs*, and/or *regional landscape linkages*.

c. Increase the isolation and/or fragmentation of the species habitat and/or critical ecosystem processes such as food webs (energy flow, decomposition, nutrient cycling), reproductive mechanisms (productivity), ecological functions. An example of impacts on an ecological function subject to habitat fragmentation could include fragmentation or isolation of a rare plant population that is dependent upon a specific pollinator population.

Cumulative Impacts for Landscape Connectivity

The incremental effects of a project on *landscape connectivity* are cumulatively considerable when viewed in conjunction with the effects of past, present, and reasonably foreseeable probable future projects.

For example, if a project would only partially constrict a *habitat connectivity corridor* at the watershed level, the project may not have a potentially significant impact on its own. However, when combined with other past, present, and reasonably foreseeable probable future projects that may have similar adverse impacts on nearby *habitat connectivity corridors*, the combined adverse effects may substantially interfere with the *landscape connectivity* associated with the larger *CWPA* or *regional landscape linkage*. In such a case, the project's impact on *landscape connectivity* would be cumulatively considerable.

6.4.5 Policy Conflicts

The following adopted County land use planning documents are associated with the protection of biological resources:

- Ventura County General Plan: Biological resource protection policies can be found throughout various elements of the General Plan such as Circulation, Transportation, and Mobility; Conservation and Open Space; Hazards and Safety; Land Use and Community Character; Public Facilities, Services, and Infrastructure; and Water Resources. See also the biological resource protection policies within each Area Plan.

- Ventura County Non-Coastal Zoning Ordinance: Includes policies and overlay zones intended to protect biological resources including the Habitat Connectivity and Wildlife Corridor Overlay Zone, *CWPAs*, wildlife crossing structures and setback areas, tree protection, and landscaping policies.
- Ventura County Coastal Zoning Ordinance: Includes policies for animal keeping, grading, tree protection, and landscaping related to biological resources protection. The ordinance also includes standards and procedures for the Santa Monica Mountains Overlay Zone, as well as policies related to *ESHA* and other biological resources.

Cumulative Impacts for Policy Conflicts

See Section 6.3.2 and Section 1.4.4, for guidance on determining cumulative impacts.

If significant impacts resulting from a conflict with an ordinance are identified, feasible and enforceable mitigation measures shall be identified. Further analysis shall be addressed in an EIR if there is substantial evidence that a conflict with an ordinance would result in potentially significant impacts.

6.5 PROJECT REVISIONS AND/OR MITIGATION RECOMMENDATIONS

If the project would result in potentially significant impacts to biological resources, project revisions and/or mitigation measures shall be identified to address the impacts. Sufficient, detailed information shall be compiled for the record to justify the effectiveness of recommended project revisions and/or mitigation measures in accordance with CEQA.

The following mitigation requirements from General Plan Program COS-GG are incorporated in this document.

If a *sensitive biological resource* would be significantly impacted, then the *Lead Agency* shall require implementation of feasible mitigation measures at the project level that fully accounts for the adversely affected resource. To the maximum extent feasible, mitigation measures should adhere to the following priority to reduce adverse impacts: avoid impacts, minimize impacts, and compensate for impacts.

Mitigation measures shall be used on a project level basis and be tailored to on-site conditions and *sensitive biological resources* present as follows:

6.5.1 Priority 1: Avoid Impacts

The project shall be sited to avoid impacts on the resource and include measures such as implementing no-disturbance buffers (e.g., nesting bird buffer areas during construction, siting staging areas outside buffer area), or implementing project-specific design features such as clustering structures within a property to allow for areas of wildlife movement.

6.5.2 Priority 2: Minimize Impacts

The project shall reduce or eliminate the impact over time by preservation and maintenance operations during the life of the project.

Measures to mitigate the spread of invasive plant species and invasive wildlife species shall include, but will not be limited to, cleaning of equipment, footwear, and clothing before entering a

construction site and the identification and treatment of significant infestations of invasive plant species within a project site. An example of reducing the adverse impacts over time through maintenance operations would be a homeowners association maintaining signs and enforcing leash laws within conserved open space areas.

6.5.3 Priority 3: Compensate for Impacts

Equivalent compensation for the impact shall be done by replacing or providing substitute resources or by rectifying the impact by repairing, rehabilitating, or restoring the impacted environment. Compensatory mitigation shall not be used to mitigate impacts that can be minimized or avoided.

Compensatory mitigation ratios for *sensitive biological resources* shall be established based on location, the rarity of the resource, quality of affected habitat associated with the resource, temporary and permanent losses to habitat function, the type of mitigation proposed (restoration, enhancement, preservation, establishment), and other requirements associated with state or federal permits. Mitigation ratios shall be determined at the project level in consultation with the *Lead Agency*, its *qualified biologist*, and, where applicable, federal or state agencies with jurisdiction over the resource. If impacts are significant, then the project shall be mitigated for the type of resource as follows:

- ***Endangered, rare, or threatened*, or *candidate species*:** The applicant shall obtain incidental take authorization from USFWS or CDFW prior to commencing development of the project site, apply minimization measures or other conditions required under the incidental take authorization, and shall provide equivalent compensation for the unavoidable losses of these resources, generally at a minimum ratio of 1:1 or greater. Compensation may include purchasing credits from a USFWS- or CDFW-approved mitigation bank or restoring or enhancing habitat within the project site or outside of the project site.
- ***Special-Status species*:** (includes *locally important species*) The applicant shall provide equivalent compensation for impacts on *special-status species* by restoring or significantly enhancing existing habitat where the species occurs, acquiring or protecting land that provides habitat function for the affected species that is at least equivalent to the habitat function removed or degraded as a result of the project.
- **Federal or State protected sensitive habitats:** Obtain the required regulatory authorization (e.g., Section 404 permits for impacts on waters of the United States, 401 water quality certification from the Regional Water Quality Control Board, a Streambed Alteration Agreement from CDFW), and provide equivalent compensation for the unavoidable losses of the above-mentioned resources such that there is *no net loss*.
- ***Waters and/or wetlands*:** In accordance with General Plan Program COS-B, provide restoration and/or replacement habitat as compensatory mitigation such that *no net loss* of *water and/or wetland* habitat results from the project. The restoration and/or replacement habitat shall be "in kind" (i.e., same type and acreage) and provide *water and/or wetland* habitat of comparable biological value. On-site restoration and/or replacement shall be preferred wherever possible. A habitat restoration and/or replacement plan to describe and implement such compensatory mitigation shall be developed in consultation with all agencies that have jurisdiction over the resource.
- **Other protected sensitive habitats:** (includes *locally important plant communities, sensitive plant communities*, *habitat connectivity corridors, regional landscape linkages*,

native wildlife nursery[5] or overwintering sites[6]) Provide equivalent compensation for other protected sensitive habitats which may include the restoration, enhancement, or preservation of the aforementioned habitats within or outside of the project site, or the purchasing of credits at an existing mitigation bank or in lieu fee program deemed acceptable by the *Lead Agency*.

All compensatory mitigation sites shall be protected in perpetuity through a *conservation easement* (if off-site), or other comparable *conservation instrument* if on-site. For any off-site compensatory mitigation sites (except CDFW-approved mitigation banks), a site-specific report shall be prepared by a *qualified biologist* that includes a description and map of all the biological resources and other notable natural features on the mitigation site.

The following criteria shall be used to facilitate adjustments to the mitigation ratio. The final mitigation ratio cannot be reduced to less than 1:1. The impact analysis shall provide a rationale for the proposed mitigation ratio supported by substantial evidence.

Table 6-1: Compensatory Mitigation Ratio Adjustment Criteria

Factor	Measure	Adjustment Criteria
Rarity of the Resource	Type of Habitat	Whether the impacted habitat is a *sensitive plant community* (with a CNDDB ranking of S1-S3 or G1-G3, oak woodlands pursuant to PRC Section 21083.4), *habitat patch*; *habitat connectivity corridor* feature; surface water feature as defined in the Ventura County Non-Coastal Zoning Ordinance; *locally important plant community;* or *locally important species*.
		Whether the impacted habitat supports a federally or state listed *endangered, rare, or threatened species*, *candidate species*, *fully protected species*; or whether the habitat is a designated USFWS critical habitat for *endangered, rare, or threatened species*.
	Habitat Connectivity Corridors	Whether the impact area is located within the Habitat Connectivity and Wildlife Corridors Overlay Zone as defined in Section 8104-7.7 and Section 8109-4.8 of the Ventura County Non-Coastal Zoning Ordinance.
		Whether the impact area is located within the *CWPA*.

[5]A native wildlife nursery is a site where native wildlife hatch, birth, care for and/or raise young.

[6]An overwintering site, also referred to as overwintering habitat, supports short- to long-range migratory wildlife during the fall or winter months. The habitat provides shelter from weather, food, places to rest or hibernate. Examples include but are not limited to hibernation sites for bats, reptiles or amphibians; winter feeding and roosting areas for raptors or wild turkey; butterfly migratory roosting sites; overwintering habitat for bees; or mast producing areas (edible seeds and fruit) that support various wildlife.

Factor	Measure	Adjustment Criteria
Quality of Impacted Habitat	Fragmentation	Whether the defined impact area is adjacent to a protected area[1]; whether the mitigation site is adjacent to a protected area; or whether the mitigation site is in a different watershed (USGS Hydrological Unit 10 or less) than the impact area.
	Native Plant and Animal Species Diversity	Whether the diversity of native plant and animal species are lower at the mitigation site than the defined impact area.[2]
Temporal Impacts	Temporary Impacts	Restoration/enhancement activities would be completed within two years of the project commencement date.
		Restoration/enhancement activities would be completed two to five years after the project commencement date.
	Long-term Impacts	Restoration/enhancement activities would be completed five years or more after the project commencement date.
	Permanent Impacts	Whether habitat is permanently removed or significantly degraded.
Type of Mitigation Proposed	Preservation	Whether existing habitat is preserved in perpetuity off-site.
	Restoration/ Enhancement	Whether restoration or enhancement mitigation is used on or off-site.

Notes:

1. A "protected habitat area" is a habitat or open space area that is protected by a local, state, or federal government agency, or other conservation organization as defined in the Ventura County Coastal Zoning Ordinance; or a habitat or open space area that must be primarily maintained in a natural state pursuant to a binding condition of approval of a subdivision approval or other land use entitlement, which contains intact native vegetation that is at least 400 feet wide and up to 500 feet long. In these circumstances, wildlife should be able to move from the mitigation site to the protected habitat area without encountering a major barrier (e.g., high-traffic road without wildlife-safe crossings, large facilities, etc.). An exception to this requirement may be allowed if the site contains one of the following: a *sensitive biological resource* that can persist in isolation (e.g., narrow endemic species or unique habitats such as vernal pools); or a habitat that functions as a *stepping stone* for *special-status species* between protected areas.
2. Refer to the Areas of Conservation Emphasis data provided by the CDFW as a coarse scoping tool (see Section 6.7).

The additional guidance below should be considered when developing mitigation measures:

- Identify requirements for monitoring and reporting for mitigation measures.

- Consider a range of possibilities, including, but not limited to, avoidance, wildlife permeable fencing, *conservation easements*, *conservation instruments*, clustering, compact design and development standards, and off-site mitigation.
- Any proposed mitigation areas should be mapped where applicable, including areas to be avoided and areas to be restored or protected.
- Should a *conservation instrument* or *conservation easement* be used to mitigate impacts, such a *conservation instrument* or *conservation easement* should encompass the location of the sensitive resource and a buffer area, as recommended by a *qualified biologist* and determined to be adequate by the *Lead Agency*, to ensure protection from impacts of the project.
- For projects subject to the Ojai Valley Area Plan, mitigation should adhere to policy OV-36.5 in the Ojai Valley Area Plan related to compensatory mitigation for impacts to *locally important plant communities*.

For each identified potentially significant impact, explicitly state whether the proposed project revisions and/or mitigation measures would reduce the impacts to a less than significant level. If the project revisions and/or mitigation measures would not reduce the impact to a less than significant level, an EIR shall be prepared.

For each mitigation measure, include a discussion of the goal of the measure, a description of the mitigation action, any monitoring or timing that is relevant, and the standard of success for the measure.

The formulation of mitigation cannot be deferred to some future time. A future study can only be called for as a mitigation measure if it addresses all the possible outcomes of the future study and outlines specific performance measures for each outcome that will reduce any potential impacts to less than significant. Such a mitigation measure shall be accompanied by a commitment by the applicant and the *Lead Agency* to implement all the possible scenarios.

6.6 AGENCY REVIEWS OF ENVIRONMENTAL DOCUMENTS

Draft MNDs and EIRs that indicate potentially significant impacts to biological resources shall be sent to CDFW, USFWS, the National Audubon Society, and the California Native Plant Society. The National Park Service shall be sent such documents when the projects are within the Santa Monica Mountains or within boundaries of the Oak Park Area Plan.

6.7 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website

Source	Managing Agency/Organization	Online Access
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
Areas of Conservation Emphasis (ACE)	California Department of Fish and Wildlife (CDFW)	Website
California Biogeographic Information and Observation System (BIOS)	CDFW	Website
California Candidate Species	CDFW	Website
California Natural Communities	CDFW	Website
California Natural Diversity Database (CNDDB)	CDFW	Website
California Threatened and Endangered Species (includes Fully Protected Species)	CDFW	Website
California Vegetation Classification and Mapping Program (VegCAMP)	CDFW	Website
Federally Designated Candidate Species	US Fish and Wildlife Service (USFWS)	Website
Federally Designated Critical Habitat Designated	USFWS	Website
Federally Designated Endangered, Rare, or Threatened Species	USFWS	Website
Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants	USFWS	Website
Guidelines for Mapping Sensitive Natural Communities	California Native Plant Society (CNPS)	PDF | Website
Manual of California Vegetation	CNPS	Website
Oak Woodland Impact Decision Matrix	Ventura County RMA Planning Division	PDF | Website
Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities	CDFW	PDF | Website
South Coast Missing Linkages Project: A Linkage Design for the Santa Monica-Sierra Madre Connection	SC Wildlands	PDF | Website
Survey of California Vegetation Classification and Mapping Standards	CDFW	PDF | Website
Ventura County Biological Resource Program	Ventura County RMA Planning Division	Website

Source	Managing Agency/Organization	Online Access
Ventura County Coastal Zoning Ordinance	Ventura County RMA Planning Division	PDF | Website
County View	Ventura County Geographic Information Systems	Website
Ventura County Critical Wildlife Passage Areas	Ventura County RMA Planning Division	Website
Ventura County General Plan, Conservation and Open Space Element	Ventura County RMA Planning Division	PDF | Website
Ventura County Habitat Connectivity and Wildlife Corridor	Ventura County RMA Planning Division	Website
Ventura County Local Coastal Program	Ventura County RMA Planning Division	Website
Ventura County Locally Important Species Program	Ventura County RMA Planning Division	Website
Ventura County Non-Coastal Zoning Ordinance	Ventura County RMA Planning Division	PDF | Website
Ventura County Ojai Valley Area Plan	Ventura County RMA Planning Division	PDF | Website
Ventura County Standards for Initial Study Biological Assessments	Ventura County RMA Planning Division	PDF | Website

7. Hydrology

7.1 BACKGROUND AND CONTEXT

7.1.1 Hydraulic Hazards

Hydraulic hazards, in the context of flood control and drainage, consist of the wearing away or deposition of land surface by wind or water. Erosion occurs naturally from weather or runoff but can be intensified by land clearing practices. Flooding is an overflow of water onto land that is normally dry.

Major flooding conditions are defined as having a one percent chance of being equaled or exceeded in any given year and are commonly referred to as the one-percent annual chance flood or 100-year flood, which is also known as a base flood. The calculated elevation of the 100-year flood is called the *base flood elevation*. Areas that have been determined by the Federal Emergency Management Agency (FEMA) as being at risk of flooding during 100-year flood events are mapped through the National Flood Insurance Program on the *Flood Insurance Rate Maps (FIRMs)* in Flood Insurance Studies, and are referred to as *Special Flood Hazard Areas (SFHA)*. Additional information on flood hazards in Ventura County is provided in Section 11.2 of the Ventura County General Plan Background Report.

7.1.2 Flood Control Facilities/Watercourses

A flood control facility is a facility owned (either in easement or in fee), operated, controlled, improved, and/or maintained by the Ventura County Watershed Protection District (WPD) to include, but not be limited to levees, debris basins, detention basins, storm drain channels and conduits, access roads, and associated appurtenances.

A watercourse is any natural or artificial flood control conveyance that includes the bed and banks and overflow areas of any stream, river, creek, ditch, channel, canal, conduit, drain, waterway, gully, ravine, arroyo, or wash within Ventura County over which the WPD exercises jurisdictional and regulatory authority. The Comprehensive Plan for Flood Control, adopted in 1960 and as amended, delineates the number and longitudinal limits of watercourses within Ventura County.

In some areas, flood control and drainage facilities that are owned and maintained by public or private entities or persons other than the WPD that provide for removal of accumulated storm waters from land through both human-made drainage facilities and natural channels. Flow of waters in channels can lead to erosion of channel beds and banks where flow velocities are high or deposition of materials where velocities are low. Existing channels may be of sufficient size to contain regulatory flow rates or they may be inadequate to contain regulatory flow rates and expose *adjacent* lands to flood hazards.

7.2 THRESHOLD OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

HYD-1 A project may have a significant impact if it would substantially obstruct, impair, divert, impede, or alter the characteristics of the flow of water within flood control facilities and watercourses, *SFHAs*, and regulatory channels both on- and off-site; or if it would result in substantial deposition of sediment and debris materials within existing channels and allied obstruction of flow, overflow of channels during design storm conditions, substantial increased runoff, or other adverse effects, resulting in exposure of *adjacent* property and the community to an increased risk of flood hazards.

HYD-2 A project may have a significant impact if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or provide substantial additional sources of polluted runoff.

HYD-3 A project may have a significant impact if it would a) conflict with the Ventura County Watershed Protection District's Comprehensive Plan for Flood Control, applicable building design and construction codes, ordinances, and standards regulating flow to and from natural and human-made drainage channels and facilities; and b) result in a significant adverse environmental effect due to that conflict.

7.3 IMPACT ANALYSIS

Potential erosion/siltation hazards and flooding hazards are ubiquitous throughout Ventura County and are addressed by the Ventura County Standard Specifications Design. Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 7.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project substantially obstruct, impair, divert, impede, or alter the characteristics of the flow of water within flood control facilities and watercourses, SFHAs, and regulatory channels both on- and off-site; or result in substantial deposition of sediment and debris materials within existing channels and allied obstruction of flow, overflow of channels during design storm conditions, substantial increased runoff, or other adverse effects, resulting in exposure of adjacent property and the community to an increased risk of flood hazards?

Impacts to flood control facilities and/or watercourses could include, but are not limited to, substantial deposition of sediment and debris materials within existing channels and allied obstruction of flow, overflow of channels during design storm conditions, or substantial increased runoff. Adverse effects in *SFHAs* and regulatory channels could potentially expose *adjacent* property and the community to increased risk of flood hazards.

Projects may expose *adjacent* property and the community to increased flood hazards by obstructing, impairing, diverting, impeding, or altering the characteristics of the flow of water, or through activities that would:

- Reduce the capacity of flood control facilities and watercourses. This includes the planting of vegetation within the watercourse or on the banks thereof.

- Erode watercourse beds 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.
- Deposit any material of any kind in a watercourse that would adversely affect the watercourse.
- Place a structure that encroaches on a flood control facility or that does not have sufficient setback from a watercourse as determined by WPD, consistent with state and local regulations, ordinances, and standards.

To determine whether the project, in part or in whole, is located within a *SFHA* or a *Regulatory Floodway*, the WPD shall review plans and other technical documents submitted by the project applicant and shall use the currently FEMA-approved *FIRMs* and *Flood Insurance Study*, the latest draft version (i.e., preliminary) of the *FIRMs* and *Flood Insurance Study* issued by FEMA, and any FEMA-approved Letter of Map Change applicable to the project site (see Section 15.4 for a link to the FEMA website regarding Letters of Map Change).

If WPD determines that current project materials are insufficient to evaluate project impacts, the project applicant may be required to prepare a scaled site plan stamped and signed by a California-licensed civil engineer, architect, or land surveyor with the following information subject to the review of WPD:

- Existing and proposed development on the project site
- Accurate delineation of the boundaries of the *SFHA* and the 'X-Unshaded' flood zone using both the latest available FEMA-approved and preliminary *FIRMs*
- Topographic information
- *Adjacent* WPD flood control facility and/or watercourse, as well as WPD property rights, if any

In addition, the project applicant may be required to prepare a drainage report signed and stamped by a registered civil engineer licensed to practice in the state of California. The drainage report should include engineering calculations, including hydrology and hydraulics, to ascertain the degree to which the project would impact flood control facilities and/or watercourses and the physical improvements necessary to meet state and local ordinance and manual standards (see checklist question (b)). Water quality requirements (in accordance with Section 9, Water Resources), and other agency mitigation areas must be addressed separately from flood control components.

Preparation of Initial Study Checklist

The following information should be used to complete the Initial Study Checklist:

A determination of **No Impact (N)** shall be made if:

- The project would not result in deposition of sediment and debris materials within existing channels and allied obstruction of flow, overflow of channels during design storm conditions, increased runoff, or cause adverse effects in *SFHAs* and regulatory channels both on- and off-site;
- If the entire project is located outside of the boundaries of a *SFHA* and is located entirely within a FEMA-determined 'X-Unshaded' flood zone (beyond the 0.2% annual chance floodplain: beyond the 500-year floodplain); or

- The WPD, after review of the drainage report, determines that the project would not have an impact to flood control facilities and/or watercourses.

A determination of **Less Than Significant (LS)** shall be made if:

- The project, in part or in whole, is located within the boundaries of a *SFHA*, but is located outside of the boundaries of the *Regulatory Floodway* and it can be demonstrated that the project can be designed and constructed to be in compliance with all applicable state and local ordinance and manual standards.
- The entire project is located outside of the boundaries of a *SFHA* and is located entirely within a FEMA-determined 'X-Shaded' flood zone (within the 0.2% annual chance floodplain: within the 500-year floodplain).
- The WPD, after review of the drainage report, determines that the project would not result in a significant impact on flood control facilities and/or watercourses.

A determination of **Less Than Significant with Mitigation Incorporated (LS-M)** shall be made if:

- The project would result in potentially significant impacts, but impacts can be mitigated to a less than significant level through project design or measures such as, but not limited to, relocating the project 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. Mitigation measures shall be developed in consultation with WPD on a case-by-case basis.
- The project would result in potentially significant impacts to flood control facilities or watercourses, but impacts can be mitigated to a less than significant level. Mitigation measures shall be developed in consultation with WPD on a case-by-case basis.

A determination of **Potentially Significant (PS)** shall be made and further analysis shall be addressed in an environmental impact report (EIR) if there is *substantial evidence* that the project, in part or in whole, is located within the boundaries of the *Regulatory Floodway*, as determined using the latest available *FIRMs* and the project would result in potentially significant impacts, including impacts to flood control facilities and watercourses.

(b) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or provide substantial additional sources of polluted runoff?

The PWA, or WPD if applicable, shall review the project plans and documents to determine if the project has the potential to increase drainage runoff, flooding, erosion, or siltation, either onsite or offsite, either temporarily or ongoing, individually or cumulatively. Compare the project and drainage study, if one was prepared, to the existing environment, as well as the goals, objectives, policies, and/or development standards that apply to the project, to identify and evaluate the significance of the impacts. The PWA (or WPD if applicable) must analyze both project-specific impacts and the project's contribution to cumulative impacts relating to drainage runoff, flooding, and erosion or siltation.

Preparation of Initial Study Checklist

The following information should be used to complete the Initial Study Checklist:

A determination of **No Impact (N)** shall be made if there is no potential for the project to increase drainage runoff, flooding, and erosion or siltation (e.g., if the project does not propose grading or construction).

A determination of **Less Than Significant Impact (LS)** shall be made if the project has the potential to increase drainage runoff, flooding, and erosion or siltation (e.g., construction that may change the existing drainage patterns of the site) and the project is consistent with applicable regulations, ordinances, and standards as outlined in checklist question (c).

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made if the project has the potential to result in significant impacts through substantially increased drainage runoff, flooding, and erosion or siltation. However, impacts can be reduced to a less than significant level by project redesign or other measures in consultation with PWA, or WPD where appropriate.

A determination of **Potentially Significant (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project has the potential to result in significant impacts through substantially increased drainage runoff, flooding, and erosion or siltation.

As part of the review, PWA, or WPD where appropriate, shall consider past, present, and reasonably foreseeable probable future projects that are located within the same watershed as the project site to assess the project's contribution to cumulative impacts on drainage runoff, flooding, and erosion or siltation.

(c) Would the project a) conflict with the Ventura County Watershed Protection District's Comprehensive Plan for Flood Control, building design and construction codes, ordinances, and standards regulating flow to and from natural and man-made drainage channels and facilities; and b) result in a significant adverse environmental effect due to that conflict?

The effects of flooding hazards, including flood control and drainage facilities, are required to be considered through building design and construction standards set forth in the following regulations, which apply to all public and privately-owned lands and projects either individually, collectively or in combination with one another:

- *FIRMs*; both the latest available and preliminary *FIRMs* as provided by FEMA
- Title 44, Code of Federal Regulations, Sections 59, 60, 65, and 70
- Ventura County Floodplain Management Ordinance, as amended
- Ventura County General Plan, Chapter 7 (Hazards and Safety Element), Section 7.2 (Flood Hazards) and Section 7.3 (Coastal Flooding)
- Ventura County Building Code
- Watershed Protection District Design Manual, as amended
- Watershed Protection District Design Hydrology Manual, as amended
- Ventura County Watershed Protection District Ordinance No. WP-2, as amended

Preparation of Initial Study Checklist

The following information should be used to complete the Initial Study Checklist:

A determination of **No Impact (N)** shall be made if the project is consistent with all applicable regulations, ordinances, and standards as stated above.

A determination of **Less Than Significant Impact (LS)** shall be made if the project has the potential to result in impacts related to flooding, but the project is consistent with all applicable regulations, ordinances, and standards as stated above.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made if the project has the potential to result in significant impacts due to a conflict with the regulations, ordinances, and standards as stated above. However, impacts can be reduced to a less than significant level by project redesign or other measures in consultation with PWA or WPD where appropriate.

A determination of **Potentially Significant (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project has the potential to result in significant impacts due to a conflict with the regulations, ordinances, and standards as stated above.

7.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines: Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
Comprehensive Plan for Flood Control	Ventura County Watershed Protection District (WPD)	PDF
Flood Insurance Study	Federal Emergency Management Agency (FEMA)	Website
Flood Map Service Center	FEMA	Website
Letter of Map Change Information	FEMA	Website
National Flood Hazard Layer	FEMA	Website
National Flood Insurance Program	FEMA	Website

Source	Managing Agency/Organization	Online Access
Title 44, Code of Federal Regulations, Emergency Management and Assistance	National Archives, Electronic Code of Federal Regulations	Website
Ventura County Building Code	Ventura County RMA Building and Safety Division	Website
Ventura County Floodplain Management Ordinance	Ventura County WPD	PDF | Website
Ventura County General Plan Background Report, Chapter 11	Ventura County RMA Planning Division	PDF | Website
Ventura County General Plan, Hazards and Safety Element	Ventura County RMA Planning Division	PDF | Website
Ventura County Standard Specifications Design	Ventura County Public Works Agency	N/A
Ventura County Watershed Protection District Ordinance No. WP-2	Ventura County WPD	PDF | Website
Ventura County Watershed Protection District Design Manual	Ventura County WPD	PDF
Ventura County Watershed Protection District Design Hydrology Manual	Ventura County WPD	Website

8. Beaches and Coastal Sand Dunes

8.1 BACKGROUND AND CONTEXT

Beaches function as natural buffers between erosive wave action and uplands, provide recreational value for residents and tourists, and serve as critical habitat for plant and animal species.

Sand beaches are dynamic geologic features, which are formed by wave deposition of material from eroded coastal uplands or bluffs and dunes; riverine transport of material to the coastline; and littoral drift, which is the movement of entrained sand grains in the direction parallel to the coast as the result of waves breaking at an angle to the shoreline (i.e., a longshore or littoral current). The size of the eroded sediment generally controls the slope of the beach, with pebble beaches being steeper than sand beaches.

A section of shoreline where the flow of sand begins at a major sediment source and terminates at a major sediment sink, such as a submarine canyon, is known as a *littoral cell*. Ventura County is part of the Santa Barbara Cell, as well as the Santa Monica Cell, in which waves moving in the direction of prevailing westerly to northwesterly winds generally meet the beaches at a slight angle because of the shoreline's orientation from northwest to southeast. The resultant effect is a net movement of sand over time from northwest to southeast along the beaches. The Santa Barbara cell ultimately deposits sand in the Mugu and Hueneme submarine canyons. The Santa Monica Cell primarily deposits sand from the Santa Monica Mountains into the submarine canyon near Point Dume and Santa Monica Bay.

Coastal sand dunes are extremely fragile as they are the natural accumulation of wind-blown sand. Like sandy beaches, coastal dune formations are dynamic in nature, migrating and reforming, depending on wind strength and direction, wave patterns, and coastal topography. Dunes also act as protective geologic features that help inhibit beach and upland erosion. Dunes form a protective buffer from both wind and wave action for beach and upland areas and resources, both natural and man-made, immediately inland. They also protect coastal salt marshes and wetlands and provide critical habitat for several coastal plant and animal species.

In Ventura County, major *coastal sand dunes* are mostly located within the cities of Oxnard and Ventura. They are found in the McGrath-Mandalay area, at Ormond Beach, in the vicinity of Naval Base Ventura County Point Mugu, and near the mouths of the Santa Clara and Ventura Rivers. Additionally, a large *coastal sand dune* formed as a result of aeolian transport is located on the inland side of Pacific Coast Highway, near the south end of Thornhill Broome Beach.

8.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following threshold of significance as specified below.

BEA-1 A project may have a significant impact if it would cause a substantial adverse change to a beach or *coastal sand dune*.

8.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the threshold of significance in Section 8.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project have the potential to cause a substantial adverse change to a beach or coastal sand dune?

An adverse change means any increased disturbance, erosion, alteration, destruction, removal, or placement of sand or vegetation on a beach or *coastal sand dune*. An adverse change may also include, but are not limited to, a building or structural development (e.g. *shoreline protective device*) that increases erosion or otherwise results in the permanent conversion of beach or *coastal sand dune* habitat, as well as any impediment to natural sand flow and transport that could impact beaches and *coastal sand dunes*. Projects that involve mining activities located upstream of a stream or river may have the potential to adversely affect sediment supply and/or sediment deposition on beaches, and thus shall be analyzed for potential impacts to beaches and *coastal sand dunes* as required by General Plan Policy COS-2.4.

Whether a project has the potential to cause a substantial adverse change may be informed by state and local policies related to beaches and *coastal sand dunes* in the California Coastal Act, in particular its provisions on *Environmentally Sensitive Habitat Areas*, as well as the Ventura County Local Coastal Program, the Ventura County General Plan, Ventura County Coastal Zoning Ordinance, and any other policies applicable to the County's beaches and *coastal sand dunes*. Refer to Section 6.1.2 of this document for additional information related to analyzing project impacts on *ESHA* within the coastal zone.

If a development project has the potential to cause a substantial adverse change or impede sand transport (e.g., the construction of *shoreline protective devices* or a use that removes aggregate materials from a dune, *littoral cell*, creek, stream, or bluff), the project applicant shall prepare a wave runup and/or coastal engineering report that evaluates the project's effects on *adjacent* structures, net littoral drift, and *adjacent* area beach profiles. The wave runup and/or coastal engineering report must:

1. Include a detailed description of the existing environmental setting of the project site in both a local and regional context, such as site topography, drainage features and patterns, coastal geologic conditions, meteorological and hydrodynamic processes (e.g., sea level rise, wave climate, seasonal and historic storm conditions), coastal hazards (e.g., erosion, tsunami risk, coastal flooding), littoral drift and sediment transport patterns, seasonal sand movement patterns, seasonal tidal and water level fluctuations, and presence of *coastal sand dunes*, if any. For projects that involve development on or *adjacent* to beaches, the wave runup and/or coastal engineering report shall describe the project site in terms of its role/function in the *littoral cell*.
2. Evaluate sea level rise as it relates to the project and its potential impacts. Refer to the Ventura County Local Coastal Program and the Ventura County Coastal Zoning Ordinance.

3. Evaluate the project in terms of its consistency with the beaches and *coastal sand dunes* policies of the California Coastal Act, as well as the Ventura County Local Coastal Program, Ventura County General Plan, and the Ventura County Coastal Zoning Ordinance;
4. If applicable, projects that involve *shoreline protective devices* may require additional survey and analysis reports pursuant to Section 8175-5.12 of the Ventura County Coastal Zoning Ordinance.
5. Identify all potentially significant impacts and *feasible* mitigation measures to avoid or reduce impacts; and
6. Identify the project's incremental effect in relation to any cumulative impacts relating to beaches and *coastal sand dunes*. For projects that involve development on or *adjacent* to beaches or bluffs, the report must evaluate the project's contribution to potential cumulative impacts generated by past, present, and reasonably foreseeable probable future projects within the *littoral cell* (refer to Section 6.1.2 of this document for evaluating impacts on *coastal sand dunes* and other types of beach/coastal habitats as it relates to *sensitive biological resources* within the coastal zone). Consult with the Resource Management Agency (RMA) Planning Division, the California Coastal Commission, and nearby local jurisdictions, as appropriate, on past, present, and reasonably foreseeable probable future projects within the *littoral cell* and their combined impacts on beach sand flow. Impacts on sand flow from other projects within the *littoral cell* must be analyzed in conjunction with the proposed project in order to evaluate the extent of cumulative impacts on beaches and *coastal sand dunes*.

If the project has the potential to cause a substantial adverse change to a beach or *coastal sand dune* that is habitat for *endangered, rare, or threatened species* or *locally important species*, the project applicant shall retain a *qualified biologist* to analyze the potential impacts according to the guidelines outlined in Section 6, Biological Resources.

Preparation of Initial Study Checklist

The following information shall be used to complete the Initial Study Checklist.

A determination of **Less Than Significant (LS)** shall be made if the project does not include development that would result in a substantial adverse change to beaches or *coastal sand dunes*.

A determination of **Less Than Significant with Mitigation Incorporated (LS-M)** shall be made if the project would result in a substantial adverse change to beaches or *coastal sand dunes*, but mitigation measures have been identified in consultation with the RMA Planning Division and Public Works Agency, as appropriate, to reduce potentially significant impacts to a less than significant level.

A determination of **Potentially Significant (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would result in a substantial adverse change to beaches or *coastal sand dunes*.

8.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		

Source	Managing Agency/Organization	Online Access
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines: Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
California Coastal Act	California Coastal Commission	Website
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
Ventura County Coastal Zoning Ordinance	Ventura County RMA Planning Division	PDF
Ventura County General Plan, Conservation and Open Space Element	Ventura County RMA Planning Division	PDF | Website
Ventura County Local Coastal Program	Ventura County RMA Planning Division	Website

9. Water Resources

9.1 BACKGROUND AND CONTEXT

9.1.1 The Basin Plans

Each of the nine Regional Water Quality Control Boards in California establishes the beneficial uses of the waters within the region in a Water Quality Control Plan. The plan contains numeric and/or narrative *water quality objectives* and spells out a program by which the objectives can be achieved within their boundaries. The Ventura County area is subject to Water Quality Control Plans of Region 3 (Central Coast Region), Region 4 (Los Angeles Region), and Region 5 (Central Valley Region), which are collectively referred to in this section as the *Basin Plans*.

9.1.2 Groundwater

Groundwater is water that occurs beneath the land surface and occupies the pore spaces and fractures of the alluvium, soil, or rock formation in which it is situated. Groundwater quality shall be determined in relationship to the *water quality objectives* and beneficial uses set by the *Basin Plans* and/or applicable *Groundwater Sustainability Plans (GSPs)*. A GSP is a plan providing a roadmap for how a specific groundwater basin, as defined by the Sustainable Groundwater Management Act, will reach long-term sustainability.

9.1.3 Surface Water

For purposes of this section, surface water is defined as all above-ground water bodies within Ventura County as identified in the *Basin Plans*, including water present on the bed surface of streams, canals, channels, lakes, reservoirs, estuaries, and harbors usually generated by precipitation and base flow conditions. Surface waters also consist of discharges from urban sources. The Pacific Ocean is considered part of the surface water resources in Ventura County. The surface water quality must be suitable to meet all *water quality standards* as derived through the application of principles as outlined in the *Basin Plans*.

Additional information on the existing conditions of groundwater and surface water in Ventura County are provided in Section 10 of the Ventura County General Plan Background Report.

9.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

WAT-1 A project may have a significant impact if it would directly or indirectly decrease the net supply of groundwater in an overdrafted *groundwater basin* by one *acre-foot* or more per year.

WAT-2 A project may have a significant impact if it would result in net groundwater extraction in *groundwater basins* that are not overdrafted, and/or not hydrologically or hydrogeologically continuous with an *overdrafted basin*, that could cause the basin to become overdrafted.

WAT-3 A project may have a significant impact if it would result in a net increase in groundwater extraction of one *acre-foot* or more per year from *groundwater basins*, *hydrologic units*, and/or *hydrogeologic units* that are not well documented or show evidence of overdraft.

WAT-4 A project may have a significant impact if it would degrade groundwater quality, or cause it to exceed groundwater quality objectives set by the *Basin Plans* and/or applicable *GSP*.

WAT-5 A project may have a significant impact if it would increase surface water consumptive use (demand) in a fully appropriated stream reach as designated by the State Water Resources Control Board (SWRCB) or where unappropriated surface water is unavailable, or by diverting or dewatering downstream reaches that would result in an adverse impact to one or more of the beneficial uses listed in the *Basin Plans*.

WAT-6 A project may have a significant impact if it would directly or indirectly impact surface water quality or stormwater quality, causing it to exceed surface *water quality objectives*, *water quality standards*, and/or *water quality-based effluent limitations* of an applicable *Basin Plan*, *Municipal Separate Storm Sewer Systems ("MS4") Permit*, *National Pollutant Discharge Elimination System (NPDES) Permit*, or result in failure to obtain coverage or comply with *Waste Discharge Requirements (WDRs)*.

9.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts meet or exceed the criteria of the thresholds of significance in Section 9.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project directly or indirectly decrease the net supply of groundwater in an overdrafted groundwater basin by one acre-foot or more per year?

Compare the project's annual groundwater demand to the historical groundwater demand to determine whether there would be a net increase. Historical groundwater demand is defined as the average annual groundwater demand as calculated for the 15-year period ending two years prior to project application (private projects) or Initial Study preparation (public projects). Consult with the appropriate groundwater sustainability agency or water agency, supplier, and/or purveyor to determine whether an alternative method of calculating historic groundwater extraction may be used for unusual or unique circumstances. Chapter 10 of the Background Report contains lists of water agencies, suppliers, and purveyors within the major watersheds identified as Ventura River, Cuyama, Santa Clara River, and Calleguas Creek, and Malibu Creek.

Determine if the project would reduce groundwater recharge. The PWA, will evaluate the project's estimated amount of groundwater usage, as well as the goals, objectives, policies, and/or development standards that apply to the project to determine the level of impact based on the identified thresholds of significance.

If the net decrease in groundwater demand is less than one *acre-foot* per year , then the project-specific and cumulative impact shall be considered less than significant. If the project's groundwater demand would increase by more than one *acre-foot* per year and/or decrease groundwater recharge that would cause a net decrease in groundwater supply in the *overdrafted*

basin, then the project shall be considered to have a potentially significant project-specific and cumulative impact.

The project applicant, in consultation with the Resource Management Agency Planning Division and PWA, shall review past, present, and reasonably foreseeable probable future projects, including those in the cities, if applicable, that are located within the same *groundwater basin* as the project, to assess the project's contribution to cumulative impacts on groundwater supply.

(b) Would the project result in net groundwater extraction in groundwater basins that are not overdrafted, and/or not hydrologically or hydrogeologically continuous with an overdrafted basin, that could cause the basin to become overdrafted?

Compare the proposed groundwater extraction quantity to the total groundwater extractions from the *groundwater basin* and/or *hydrologic unit* or *hydrogeologic unit*. This evaluation requires a review of any supporting data, including estimates of annual groundwater withdrawals from the basin and or *hydrologic unit* or *hydrogeologic unit*, estimates of the project's proposed groundwater use, and evaluation of groundwater levels over time. If no data is available, consult with the appropriate groundwater sustainability agency or water agency, supplier, and/or purveyor to identify the *groundwater basins*, *hydrologic units*, and/or *hydrogeologic units* where basin conditions are not well known or documented and historical water levels in the basin shall be evaluated for trends. If the comparison shows that the project has the potential to cause overdraft, then the project-specific and cumulative impact shall be considered potentially significant.

(c) Would the project result in a net increase in groundwater extraction of one acre-foot or more per year from groundwater basins, hydrologic units, and/or hydrogeologic units that are not well documented or show evidence of overdraft?

PWA shall identify the *groundwater basins*, *hydrologic units*, and/or *hydrogeologic units* where basin conditions are not well known or documented.

Historical water levels in the basin shall be evaluated for trends. The project-specific and cumulative impact shall be considered less than significant if the project would result in less than one *acre-foot* per year in groundwater extraction. If the evaluation determines that declining water levels indicate a net deficit in groundwater storage and the project would result in an increase in groundwater extraction of one *acre-foot* or more per year, then the project shall be considered to have a potentially significant project-specific and cumulative impact.

(d) Would the project degrade groundwater quality, causing it to exceed groundwater quality objectives set by the Basin Plans?

Groundwater quality objectives set by the *Basin Plans* and/or applicable GSP are numerical objectives that, if exceeded, indicates an impairment of a beneficial use of groundwater.

Determine whether the project is located within an area with an impacted or non-impacted *groundwater basin*. A non-impacted *groundwater basin* contains *hydrogeologic units* where all groundwater *constituents* currently meet the *water quality objectives* of the *Basin Plans*. A *groundwater basin* is considered an impacted basin if it currently exceeds one or more *water quality objectives* of the applicable *Basin Plan*.

Projects proposing the use of onsite wastewater treatment systems such as, but not limited to, septic tanks, leach fields, and seepage pits, or animal husbandry or animal boarding facilities in basins known to be impacted by concentrations of nitrates exceeding *water quality objectives* shall

be reviewed by the Ventura County Resource Management Agency (RMA) Environmental Health Division and the appropriate groundwater sustainability agency, if applicable. The Regional Water Quality Control Board may also be consulted, if necessary. The Ventura County RMA Environmental Health Division may impose project conditions or recommend measures to reduce the project's potential for nitrate loading.

The project applicant, in consultation with the Ventura County RMA Planning Division and PWA, shall review past, present, and reasonably foreseeable probable future projects, including those in the cities, if applicable, that are located within the same *groundwater basin* as the project in order to assess the project's contribution to cumulative impacts on groundwater quality.

PWA shall evaluate the project's estimated potential contribution to groundwater quality impacts, as well as the goals, objectives, policies, and/or development standards that apply to the project to determine the level of impact based on the thresholds of significance.

Preparation of Initial Study Checklist

A project shall be considered to have a **Less Than Significant Impact (LS)** if it:

- Will not cause the *hydrogeologic unit* within a non-impacted basin to exceed *water quality objectives* of the *Basin Plans*;
- Will not contribute to further exceedance of *water quality objectives* within an impacted basin;
- Will not result in the discharge of materials known to be and/or classified as hazardous by the State of California;
- Will provide provisions for the implementation of preventative measures and Best Management Practices (BMPs), including but not limited to spill and leak prevention, training, appropriate material storage and disposal, and spill and leak response and reporting. For purposes of this section, BMPs are practices, physical devices, or systems designed to prevent or reduce pollutant loading from stormwater or non-stormwater discharges to receiving waters.

Projects that could be considered to have a potentially significant impact but have identified mitigation measures reviewed and approved by PWA to reduce impacts to a less than significant level, shall be considered **Less Than Significant with Mitigation Incorporated (LS-M)**. Mitigation measures shall be developed on a case-by-case basis when a determination of LS-M has been identified.

A project shall be considered to have a **Potentially Significant Impact (PS)** and further analysis shall be addressed in an EIR if there is *substantial evidence* that it would:

- Cause the *hydrogeologic unit* within a non-impacted basin to exceed *water quality objectives* of the *Basin Plans*;
- Contribute to further exceedance of *water quality objectives* within an impacted basin;
- Result in the discharge of materials known to be and/or classified as hazardous by the State of California;
- Does not provide provisions for the implementation of preventative measures, BMPs, including but not limited to spill and leak prevention, training, appropriate material storage and disposal, and spill and leak response and reporting.

(e) Would the project increase surface water consumptive use (demand) in a fully appropriated stream reach as designated by the SWRCB or where unappropriated surface water is unavailable, or by diverting or dewatering downstream reaches that would result in an adverse impact to one or more of the beneficial uses listed in the Basin Plans?

Determine the project's geographical relationship to natural and artificial surface water bodies and the hydrologic relationship to those bodies. Evaluate the project's impacts on surface waters, and whether the project will increase or decrease the quantity of surface water either individually or cumulatively. If the project utilizes surface water for construction or long-term operation, the source of the water should be disclosed and the potential use quantified. In addition, if the project utilizes surface water from a municipal provider, the source of the surface water from that provider must be disclosed and evaluated. Determine whether surface water for the project would be from a fully appropriated stream reach as designated by SWRCB or if unappropriated surface water is available for the project. Evaluate whether any changes in surface water flow would adversely affect beneficial uses or the source of the water.

(f) Would the project directly or indirectly impact surface water quality or stormwater quality, causing it to exceed water quality objectives, water quality standards, and/or water quality-based effluent limitations of an applicable Basin Plan, MS4 Permit, NPDES Permit, or result in failure to obtain coverage or comply with WDRs?

PWA shall evaluate projects for compliance with the relevant *MS4 Permit* and/or whether projects are subject to coverage under any other *NPDES Permit*s or *WDRs*, as applicable. Pursuant to Water Code Section 13260(a), any person discharging waste or proposing to discharge waste within any region, other than to a community sewer plant, that could affect water quality, shall be required to provide a report of waste discharge (also referred to as an application) to obtain coverage under *WDRs* or a waiver of *WDRs*.

If the project is determined to be subject to the *MS4 Permit*, standard conditions shall be imposed on the project in order to comply with the *MS4 Permit*. If the project requires coverage under any other *NPDES Permit*(s) or *WDRs*, standard conditions shall be imposed on the project to obtain and maintain required coverage. Projects within areas subject to a Total Maximum Daily Load program (see Section 9.4), which drain to impaired waterbodies documented in the 303(d) List of Impaired Waters under the federal Clean Water Act, will be required to implement BMPs to comply with required *water quality standards* and *water quality-based effluent limitations*.

If after all applicable standard conditions are imposed on the project to minimize impacts, the project would still cause water quality or stormwater quality to exceed established *water quality objectives* or *water quality standards* set forth in the applicable *Basin Plan*, *MS4 Permit*, *NPDES Permit*, or *WDRs*, the project shall be considered to have a significant impact.

9.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website

Source	Managing Agency/Organization	Online Access
Ventura County Initial Study Assessment Guidelines: Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist	Ventura County RMA Planning Division	PDF | Website
References		
303(d) List of Impaired Waters	United States Environmental Protection Agency	Website
Municipal Stormwater Program (MS4 regulation)	State Water Resources Control Board	Website
National Pollutant Discharge Elimination System (NPDES)	United States Environmental Protection Agency	Website
Groundwater Sustainability Plans	California Department of Water Resources	Website
State and Regional Water Boards	State Water Resources Control Board	Website
Sustainable Groundwater Management Act (SGMA)	California Department of Water Resources	Website
Total Maximum Daily Load Program	State Water Resources Control Board	Website
Ventura County General Plan Background Report, Chapter 10	Ventura County RMA Planning Division	PDF | Website
Ventura County Groundwater Resources	Ventura County Public Works Agency (PWA)	Website
Ventura County Stormwater Program	Ventura County PWA	Website
Water Quality Control Plans (Basin Plans)	State Water Resources Control Board	Website
Waste Discharge Requirements Program (WDRs)	State Water Resources Control Board	Website

10. Paleontological Resources

10.1 BACKGROUND AND CONTEXT

Paleontological resources refer to the fossilized remains or indications of once living plant and animal life. *Paleontological resources* are present in many of the geologic formations in Ventura County. The region is part of the Transverse Range, which is an east-west trending Tertiary (70 to 1 million years ago) sedimentary mountain corridor that encompasses many kinds of fossilized organisms. These fossil remains provide a record of lifeforms over millions of years. In Ventura County, paleontological remains include examples from throughout most of geological history, including the Paleozoic (600-225 million years ago), the Mesozoic (225-70 million years ago), and the Cenozoic (70 million years ago to the present) Eras. The coastal and interior zones of Ventura County contain areas with marine and terrestrial *fossils* that are among the best in Southern California. Careful scientific study of fossilized life forms preserved in the sedimentary and metamorphic rocks of the Ventura County region can result in the identification of local paleo-environmental conditions and biological evolutionary trends. In addition, certain fossil remains are only found in isolated outcrops in Ventura County and are therefore of unique scientific interest.

10.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

PAL-1 A project may have a significant impact if the project would directly or indirectly destroy a unique *paleontological resource* or site.

10.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 10.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project directly or indirectly destroy a unique paleontological resource or site?

Direct impacts may include, but are not limited to, grading and excavation of fossiliferous rock, which can result in the loss of scientifically important fossil specimens and associated geological data. *Indirect impacts* may include, but are not limited to, increased access opportunities and unauthorized collection of fossil materials from sites that contain unique *paleontological resources*.

Preliminary Assessment

The preliminary assessment should be done by the *Lead Agency*. The *Lead Agency* should first determine the *paleontological importance* of geological formations exposed in the proposed project's disturbed area. A qualified consultant may be retained by the project applicant to determine the geologic formations on which the project is located. The Paleontology map layer on the Ventura County *Resource Management Agency Geographic Information System (RMA GIS) Viewer* is available to determine *paleontological importance*. The goal of this review is to determine where sensitive resources may exist on the site and to locate new development in areas that would avoid adverse impacts to *paleontological resources* to the maximum extent *feasible*. Potentially significant impacts to *paleontological resources* that cannot be avoided through siting and design alternatives shall be mitigated.

The geologic formation in which proposed projects would be located can be used to establish the likelihood of *paleontological resources* being present and their relative importance. Table 10-1 shows a ranking of *paleontological importance* of geologic formations in the Ventura County area. Formation names are taken after Dibblee Geological Foundation quadrangle maps, various dates.

Table 10-1. Ranking of Paleontological Importance of Geologic Formations

Formation	Geologic Age	Paleontological Importance
Santa Susana	Paleocene	High
Llajas	Eocene	High
Sespe	Oligocene	High
Saugus	Pliocene/ Pleistocene	High
Las Posas Sand	Pliocene/ Pleistocene	Moderate to High
Vaqueros Sandstone	Oligocene	Moderate to High
Pico	Pliocene	Moderate to High
Monterey	Miocene	Moderate
Topanga Group	Oligocene / Miocene	Moderate
Chatsworth	Cretaceous	Moderate
Caliente	Miocene	Moderate
Sisquoc	Miocene	Moderate
Santa Margarita	Miocene	Moderate
Quatal	Pliocene	Low
Lockwood Clay	Pliocene	Low
Plush Ranch	Oligocene / Miocene	Low
Rincon Shale	Miocene	Low
Coldwater Sandstone	Eocene	Low
Cozy Dell Shale	Eocene	Low

Formation	Geologic Age	Paleontological Importance
Matilija Sandstone	Eocene	Low
Juncal	Eocene	Low
Towsley	Pliocene / Miocene	Low
Castaic	Miocene	Low
Conejo Volcanics	Miocene	None

Quaternary deposits represent the last 2.6 million years of geological history and include alluvial deposits and landslides, which have the potential for low to no resource importance. If the project involves disturbance activities located in an area of Quaternary Deposits (alluvium), or Moderate, Low, or None level of *paleontological importance*, no further assessment is needed. If the project involves disturbance activities located in an area of "High," or "Moderate to High" *paleontological importance*, a qualified consultant assessment will be required.

Qualified Consultant Assessment

Prior to conducting paleontological field surveys and submitting paleontological studies if required, consultants must first demonstrate that they meet the minimum qualifications as defined below.

- **Education**: A Bachelor of Science degree in Paleontology, Geology or related discipline.
- **Experience**: A minimum of five years of experience performing paleontological, geological, or related studies is required.
- **Local and State Expertise**: Evidence of expertise in local and regional vertebrate and invertebrate paleontology. Evidence of conducting fossil collection, curation, and reporting is necessary.
- **Professional Registration or Certification**: Verification of certification in the paleontological field by membership in a professional society is required. For professional geologists, verification of professional registration as a professional geologist in the State of California is required, which may be indicated by signature and professional stamp within the paleontological report.

The assessment procedures described below must be performed by a qualified paleontological or geological consultant, or both, as necessary. A qualified consultant is one that meets the minimum qualifications as described above.

The qualified consultant shall verify the potential presence of a unique *paleontological resource* based on the geologic formation on which the project is located, and provide appropriate responses and mitigation measures to the Initial Study Checklist based on the assessment procedures outlined below:

1. Conduct literature and archival reviews within the project area to document locations of recorded fossil sites.
2. Verify or modify the level of *paleontological importance* assigned to each formation in the project area.

3. Conduct a field survey of the appropriate formations (not including areas covered by soil or Quaternary Deposits). If vertebrate *fossils* (i.e., fossils of animals containing a spine or endoskeleton) are found, document the location of vertebrate *fossils*. If megainvertebrate *fossils* (i.e., fossils of animals containing no bony or cartilaginous material) are found, determine the level of significance and document the location of representative samples, as necessary. Document these sites on topographic maps of the project area. Vertebrate and megainvertebrate *fossils* are considered highly important because they are comparatively rare and allow precise age determinations and environmental reconstructions for the strata in which they occur. Microinvertebrate *fossils*, also known as microfossils, are much more abundant and are often of economic importance. For this reason and because of their small size, microinvertebrate *fossils* would not be adversely impacted to the same degree as vertebrate and megainvertebrate *fossils*. For the purposes of *paleontological resources*, the project area is defined as only the area of the property that is disturbed by or during the construction of the proposed project. Fossil remains are considered a unique *paleontological resource* if they meet the following qualifications:
    - well preserved;
    - identifiable;
    - type/topotypic specimens;
    - age diagnostic;
    - useful in environmental reconstruction;
    - represent rare and/or endemic taxa;
    - represent a diverse assemblage; and/or
    - represent associated marine and non-marine taxa.
4. Subsurface geotechnical studies requiring excavation or drilling must be monitored and reported as in (c) above.
5. As determined necessary by the qualified consultant, other selected stratigraphic levels within the project may be documented for future collection of matrix samples to process for *microinvertebrate fossil* remains.
6. Identify adverse impacts and assess degree of impact to each formation and/or significance of the unique *paleontological resource* in the project area that would be impacted by the proposed project.
7. Develop a project specific program to monitor and/or collect *fossils* documented in (c) and (d) above during construction and address mitigation of project related impacts.
8. Evaluate past, present, and reasonably foreseeable probable future projects to determine whether the project would result in significant cumulative impacts to *paleontological resources* for their scientific and educational value, including the substantial loss of *paleontological resources* in Ventura County.
9. Prepare a separate supporting technical report consisting of sensitive data and submit to the appropriate public agency. Summarize the technical report for the environmental document determination.

Preparation of Initial Study Checklist

Based on the results of the qualified consultant assessment outlined above, the *Lead Agency* should review the supporting technical report and responses to the Initial Study Checklist and, if required, include the consultant's mitigation recommendations.

The *Lead Agency*, based on review of the various available maps, publications and/or field information, shall determine the project impacts to the *paleontological resources* and complete the Initial Study Checklist in consultation with the qualified consultant.

A determination of **No Impact (N)** shall be made if the project is not within a geologic formation of High, or Moderate to High *paleontological importance*.

A determination of **Less Than Significant Impact (LS)** shall be made if the project is within a geologic formation of High or Moderate to High *paleontological importance*, but unique *paleontological resources* are buried at depth beneath alluvium in the area of the project disturbance, and the project will not directly or indirectly impact the *paleontological resource*.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made if the project would result in potentially significant impacts to a unique *paleontological resource*, but mitigation measures have been identified by a qualified consultant. Mitigation may include, but are not limited to the following measures:

1. If determined necessary by the *Lead Agency*, a paleontological monitor shall be retained to monitor ground-disturbing activities and/or construction activities. The paleontological monitor shall document all monitoring activities, regardless of whether any paleontological discoveries are made.
2. In accordance with General Plan Program COS-II, if any paleontological materials or artifacts are discovered during ground disturbance and/or construction activities, such activities shall halt until a qualified consultant can access the discovery. A report or memorandum shall be prepared by the qualified paleontological monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources. Recommendations or mitigation identified by the qualified paleontological monitor shall be implemented prior to resuming ground disturbance and/or construction activities.
3. Projects shall be designed to protect existing resources and shall avoid potential impacts to the maximum extent *feasible*. However, if a qualified consultant determines that the discovered resource is a unique *paleontological resource*, and avoidance or protection in place is not *feasible*, divert construction activities to other areas until the resource has been collected or removed by a qualified consultant, and curated at a location satisfactory to the *Lead Agency*. The qualified paleontological monitor shall document the findings, its importance, and the curated location in a report or memorandum.
4. In accordance with General Plan Program COS-KK, during project-level ground disturbance activities in areas where paleontologically rich sites are known to be present, project sites shall be secured during non-construction hours to ensure that the unauthorized access and the unlawful curation of fossil materials does not occur. Such security measures may include construction fencing, unauthorized access signage, security lighting, and security cameras. For large-scale development, a security plan may be prepared prior to construction activities to detail security measures and protocol for the project site.

A determination of **Potentially Significant Impact (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project lies in a geologic formation of High, or Moderate to High *paleontological importance*, and the project would have a significant impact on unique *paleontological resources*.

Update Paleontological Database

The qualified consultant shall provide to the *Lead Agency* a copy of any paleontological report, as well as any GIS layers of the *paleontological resources* identified by the qualified consultant, including fossil location, fossil name, fossil age, and geologic formation name. The *Lead Agency* shall update its records and the Paleontology map layer on the Ventura County *Resource Management Agency Geographic Information System (RMA GIS) Viewer* accordingly.

10.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines: Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
Ventura County General Plan, Conservation and Open Space Element	Ventura County RMA Planning Division	PDF | Website
Ventura County RMA Geographic Information Systems Viewer	Ventura County Information Technology Services	Website

11. Mineral Resources

11.1 BACKGROUND AND CONTEXT

Mineral resources in Ventura County consist of aggregate resources, more commonly known as construction grade sand and gravel, as well as petroleum resources in the form of oil and gas deposits. There are other mineral resources extracted in Ventura County, but they are not designated as significant by the state nor do they play a major role in the County's economy.

11.1.1 Aggregate Resources

The Surface Mining and Reclamation Act of 1975 (SMARA) was enacted by the California legislature to promote the conservation of the state's mineral resources, ensure adequate reclamation of mined lands, and prevent or minimize the negative impacts of surface mining to public health, property, and the environment. The State Division of Mine Reclamation was created to provide a measure of oversight for local governments as they administer SMARA within their respective jurisdictions. Among other provisions, SMARA requires the State Geologist to classify land in California into *Mineral Resource Zones (MRZs)* according to the known or inferred mineral potential of the land as determined by geological study. *MRZ* designated lands in Ventura County are delineated in Figure 8-9 in Section 8.4 of the Ventura County General Plan Background Report ("Background Report") and *County View* and the Ventura County *Resource Management Agency Geographic Information System (RMA GIS) Viewer*.

The *MRZs* have been established based on the presence or absence of significant sand and gravel deposits and crushed rock source area, e.g., mineral products used in the production of cement. The *MRZ-2* classification applies to lands where mineral resources are present. For a mineral deposit to be considered significant and therefore eligible for the *MRZ-2* classification, it must meet criteria established by the State Mining and Geology Board (SMGB) for material quality, marketability, and economic value. *MRZ-2* is classified for Portland Cement Concrete construction aggregate, which is subject to a series of specifications to ensure the manufacture of strong durable concrete. Construction grade aggregate (sand, gravel, and crushed rock) plays an important role in the economy, particularly the building and paving industries.

The Oak Ridge Hills extend westward from the Los Angeles County line from Simi Valley to the area between the cities of Moorpark and Fillmore. Several areas along this trend have been designated as *MRZ-2* lands by the SMGB. Aggregate is extracted from the ancient streambed deposits that crop out in these hills at several existing mining facilities. These mining facilities are the primary source of aggregate in Ventura County.

The County has determined that lands classified *MRZ-2* (or otherwise designated as areas of statewide or regional significance for mineral resources) should be protected from incompatible land uses that would inhibit extraction of or access to the available mineral resources. The *MRZ-2* lands are identified in the Ventura County Non-Coastal Zoning Ordinance with a Mineral Resource Protection (MRP) overlay zone.

11.1.2 Petroleum Resources

Petroleum reserve areas are located in the northwest, northeast, central and south-coastal quadrants of the county, as well as offshore (see Figure 8-10 in Section 8.4 of the Background Report). Offshore production within three miles of the coast is under the jurisdiction of the state. Production is under federal jurisdiction beyond three miles. The California Geologic Energy Management Division (CalGEM) is the primary state agency that regulates the oil, natural gas, and geothermal industries. While the Federal Energy Regulatory Commission is the primary federal agency that regulates the oil and gas industry, a number of other federal agencies oversee specific components of the oil and gas industry, including but not limited to the Bureau of Land Management, Bureau of Ocean Energy Management, Bureau of Safety and Environmental Enforcement, and the U.S. Environmental Protection Agency.

11.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

MIN-1 A project may have a significant impact if it would result in the loss of availability of a) a known aggregate resource that would be of value to the region and the residents of the state, or b) a locally important aggregate resource recovery site.

MIN-2 A project may have a significant impact if it would hamper or preclude extraction of, or access to, locally important petroleum resources, or would otherwise result in the loss of availability of a known petroleum resource that would be of value to the region and the residents of the state.

11.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist are provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 11.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project result in the loss of availability of (a) a known aggregate resource that would be of value to the region and the residents of the state, or (b) a locally important aggregate resource recovery site?

Determinations of impact significance of individual and cumulative impacts requires a case-by-case determination based on the project's proposed use and its location relative to aggregate resource areas, as well as past, present, and reasonably foreseeable probable future projects. Although *MRZs* are depicted in Figure 8-9 in Section 8.4 of the Background Report and on the MRP overlay zone as depicted on *County View* and *RMA GIS Viewer*, project impacts shall be analyzed based on the most current resource maps available at the time of analysis. The following considerations should be taken into account to determine the significance of impacts:

If the project is not within the MRP overlay zone, and does not abut land within the MRP overlay zone, then the project would have a less than significant impact on extraction of aggregate resources.

If the project is located on or abuts land within the MRP overlay zone or land subject to a surface mining Conditional Use Permit (CUP), then the California Geological Survey shall be consulted to determine the level of impact.

SMARA requires that "[p]rior to permitting a use that would threaten the potential to extract minerals" in an area that contains mineral deposits of regional or statewide significance, the *Lead Agency*, in addition to preparing the environmental document, is also required to prepare a statement specifying its reasons for permitting the proposed use. In addition to public circulation, this statement must be provided to the State Geologist and the SMGB for review and comment. See Sections 2762 and 2763 of SMARA.

(b) Would the project hamper or preclude extraction of, or access to, locally important petroleum resources, or otherwise result in the loss of availability of a known petroleum resource that would be of value to the region and the residents of the state?

Although petroleum resource areas are depicted on the petroleum resources map (Figure 8-10) in Section 8.4 of the Background Report, project impacts shall be analyzed based on the most current resource maps available at the time of analysis. Existing oil and gas exploration and production CUP areas are depicted on the *RMA GIS Viewer*. The following considerations should be taken into account to determine the significance of impacts:

If the project is not located on or *adjacent* to any known petroleum resource area subject to an existing oil and gas exploration and production CUP, then the project would have a less than significant impact on the extraction of petroleum resources.

If the project site is located on or *adjacent* to a known petroleum resource area subject to an existing oil and gas exploration and production CUP, then CalGEM shall be consulted to determine the level of impact.

Otherwise, determinations of impact significance must be determined on a case-by-case basis. Determinations of significance of cumulative impacts must be determined on a case-by-case basis in consideration of past, present, and reasonably foreseeable probable future projects.

11.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines: Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
County View	Ventura County Geographic Information Systems	Website

Source	Managing Agency/Organization	Online Access
Surface Mining and Reclamation Act (SMARA)	California Department of Conservation	Website
Ventura County General Plan Background Report, Chapter 8	Ventura County RMA Planning Division	PDF | Website
Ventura County Non-Coastal Zoning Ordinance	Ventura County RMA Planning Division	PDF
Ventura County RMA Geographic Information System Viewer	Ventura County Information Technology Services	Website

12. Aesthetics

12.1 BACKGROUND AND CONTEXT

This section analyzes a project's potential impact on scenic resources and glare.

12.1.1 Scenic Resources

Scenic resources consist of distinctive aesthetic resources that the County has determined are worthy of conservation. The *Area Plans* for Lake Sherwood, Oak Park, the Ojai Valley, and Piru recognize these resources. Scenic resources may include:

- *Viewsheds* from a publicly accessible vantage point
- *Viewsheds* from designated state or county scenic highways
- Areas publicly accessible for recreational use
- Areas such as ridgelines, hillsides, and rock outcroppings
- *Viewsheds* with scenic water features such as creeks, rivers, and lakes
- *Viewsheds* from publicly accessible open space areas with natural features such as dense vegetation cover and stands of trees
- Scenic and visual qualities of coastal areas comprised of landscape patterns and features which are visually or aesthetically pleasing, and which are visible from a *public viewing location*, including but not limited to the beach or ocean, coastline, mountains, canyons, ridgelines, significant hillsides and open space, estuaries, wetlands and lagoons, other unique natural or human-made features such as the Channel Islands Harbor.

12.1.2 Glare

Glare is the sensation produced by a bright source within the visual field that is sufficiently brighter than the level to which the eyes are adapted causing annoyance, discomfort, or loss in visual performance and visibility.

Conditions that create glare are typically caused by the reflection of sunlight from highly reflective surfaces at or above eye level, or the reflective surfaces of buildings with materials such as metal or glass that lead to *disability glare* or *discomfort glare* for motorists travelling on roads where the traffic volumes/speeds are generally high (e.g. *Regional Road Network*).

12.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

AES-1 A project may have a significant impact if it would:

a. have a substantial adverse effect on a *scenic vista*;

b. substantially damage scenic resources; or

c. substantially degrade the existing visual character or quality of a *public viewing location* of the site and its surroundings.

AES-2 A project may have a significant impact if it would include materials that would produce *disability glare* or *discomfort glare* for motorists traveling along one or more roadways within the *Regional Road Network*, which exceeds the glare source to the median of the background ratio of 3:1 in a *luminance histogram*.

12.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 12.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

After acquiring the information relevant to each question, the *Lead Agency* must compare the project plans, project description, and (if requested) visual simulations and/or line of sight diagrams to the existing environment, as well as the goals and policies that apply to the project. The *Lead Agency* must analyze both project-specific and cumulative impacts relating to scenic resources and glare effects. Determinations as to the significance of the visual impact shall be made by the *Lead Agency* in light of applicable CEQA case law on visual and aesthetic impacts.

(a) Would the project have a substantial adverse effect on a scenic vista; substantially damage scenic resources; or substantially degrade the existing visual character or quality of a public viewing location of the site and its surroundings?

The evaluation of a project's potential impacts on scenic resources involves a degree of subjectivity because it is a qualitative assessment of the aesthetic characteristics of a physical feature(s) or *viewshed*. Therefore, it is important that the evaluation of a project's potential impacts on scenic resources be supported by *substantial evidence* in the public record for the project and conducted in accordance with the thresholds of significance.

Compliance with Public Resources Code Section 21081.3

Determine whether the project is subject to Public Resources Code (PRC) Section 21081.3, which states that a *Lead Agency* is not required to evaluate the aesthetic effects of a project and aesthetic effects shall not be considered significant effects on the environment if the project involves the refurbishment, conversion, repurposing, or replacement of an existing building that meets all of the following requirements:

The building is abandoned, dilapidated, or has been vacant for more than one year. Pursuant to PRC Section 21081.3, "dilapidated" means decayed, deteriorated, or fallen into such disrepair through neglect or misuse so as to require substantial repair for safe and proper use.

- The building site is immediately *adjacent* to parcels that are developed with qualified urban uses or at least 75 percent of the perimeter of the site adjoins parcels that are developed with qualified urban uses and the remaining 25 percent of the site adjoins parcels that previously have been developed for qualified urban uses.

- The project includes the construction of housing.
- Any new structure does not substantially exceed the height of the existing structure.
- The project does not create a new source of substantial light or glare.

However, a project meeting one of the above requirements must be evaluated for potentially significant aesthetic impacts if it would have an adverse effect on either of the following:

- an official state scenic highway established pursuant to Article 2.5 (commencing with Section 260) of Chapter 2 of Division 1 of the Streets and Highways Code
- historical or cultural resources

Note that Section 21081.3 will remain in effect until January 1, 2029.

Public Viewing Location Assessment

The *Lead Agency* should request a *public viewing location* map from the Ventura County *Resource Management Agency Geographic Information System (RMA GIS) Viewer* and conduct a site visit to ascertain the following and, if necessary, obtain photo documentation:

Any scenic resources that may exist on-site or *adjacent* to the project site, and the visibility of the scenic resources from surrounding *public viewing location*s; and,

The degree to which the project site is visible from, and defines the context of, any *scenic vista* from surrounding *public viewing locations*.

Maps of Scenic Resources

In evaluating the potential significance of impacts to scenic resources, consult the Scenic Resource Areas map (Figure 8-7) and Scenic State Highways map (Figure 8-8) in Section 8.3 of the Ventura County General Plan Background Report or as depicted on *County View* and *RMA GIS Viewer*, applicable *Area Plan* scenic resource policies, and zoning and land use maps to:

- Determine whether the project site is located within a *Scenic Resource Protection Overlay Zone*, which includes *viewsheds* of selected county lakes and State or County designated scenic highways, and other scenic resource areas as determined by an *Area Plan* (see Section 8109-4.1.1 of the Non-Coastal Zoning Ordinance). The lakes included in this overlay zone are Lake Casitas, Lake Matilija, Lake Piru, and Lake Sherwood. Highway 33 (Jacinto Reyes Scenic Byway) is in the Los Padres National Forest and was designated scenic by Caltrans in 1988. Several other county highways are eligible for State listing;
- Obtain the land use and zoning designations for the project site and surrounding area; and
- Determine which land use and scenic resource policies apply to the project.

The Scenic Resource Protection Overlay Zone is depicted on the Scenic Resource layer on *County View* and *RMA GIS Viewer*. If the project is located within the *Scenic Resource Protection Overlay Zone*, the *Lead Agency* should request a *public viewing location* map from *RMA GIS Viewer* and visual simulations and/or line of sight diagrams from the project applicant in order to evaluate impacts relating to scenic resources. While areas within the *Scenic Resource Protection Overlay Zone* should be carefully considered, potential impacts to scenic resources are not limited to those areas.

The *Lead Agency* must consider past, present, and reasonably foreseeable probable future projects that are located within the same *scenic vista* as the project site in order to assess the project's contribution to cumulative impacts to scenic resources.

(b) Would the project include materials that would produce disability *or discomfort glare for motorists traveling along one or more Regional Road Network roadways, which exceeds the glare source to the median of the background ratio of 3:1 in a luminance histogram?*

Review the Project

The *Lead Agency* must review the project description materials and note any potential sources of glare pursuant to General Plan Program COS-FF, including the use of reflective surfaces such as metal, glass, or other materials that could produce glare and that the *Lead Agency* determines would potentially be visible to motorists traveling along one or more *Regional Road Network* roadways.

Site Visit

If the project proposes to use reflective materials, the *Lead Agency* should request a *public viewing location* map from *RMA GIS Viewer* and visit the project site, the roads within the *Regional Road Network* within the vicinity of the project site, and document (with photographs, if necessary) any sources of potential glare.

If the project would not be visible from a roadway within the *Regional Road Network*, the project would have a less than significant glare impact.

Pursuant to General Plan Program COS-FF, if the *Lead Agency* determines that the project would include materials that would produce *disability* or *discomfort glare* for motorists traveling along one or more *Regional Road Network* roadways then the *Lead Agency* shall either require the use of alternative materials, such as high-performance tinted non-mirrored glass, painted (non-gloss panels), and pre-cast concrete or fabricated textured wall surfaces, or require that the applicant submit a study demonstrating that the project would not introduce a glare source that exceeds 3:1 in a *luminance histogram*, which consists of inputting a set of digital photographs from a subject glare source into a computer simulation program and generating a graph that identifies the brightness level of different sections of that scene, from darkest to brightest.

The study of potential glare upon nearby *Regional Road Network* roadways should utilize a computer simulation program that determines the intensity of glare that would occur at a given project site, based upon the geography of the site, in relation to how the sun may cause a strong reflection at different times of the day. The type of building materials should be incorporated into the simulation. The level of increase in ambient light (i.e., light surrounding an environment or subject) from a new project to the surrounding area can be determined by a *luminance histogram*. The source of glare can be classified into two categories: *disability glare* and *discomfort glare*. In a *luminance histogram*, the source of most extreme brightness to one's vision is the sun, which is beyond the capacity of the eye to adapt. This is considered to be an "absolute value" of glare. Some sources of glare could be below this threshold and would still be considered a significant source of glare when a viewer's vision adapts to the lower background level of the subject environment. Thus, glare impacts would be considered significant when the glare source to the median of the background ratio exceeds 3:1 in a *luminance histogram*.

Impact Mitigation

Glare impacts could be reduced by ensuring that building materials for the project consist of materials such as high-performance tinted non-mirrored glass, painted (non-gloss) panels, and pre-cast concrete or fabricated textured wall surfaces.

12.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
County View	Ventura County Geographic Information Systems	Website
Ventura County General Plan, Area Plans	Ventura County RMA Planning Division	PDF | Website
Ventura County General Plan Background Report, Chapter 8	Ventura County RMA Planning Division	PDF | Website
Ventura County RMA Geographic Information Systems Viewer	Ventura County Information Technology Services	Website

13. Historical Resources

13.1 BACKGROUND AND CONTEXT

The term "historical resources" falls within the broader category of "cultural resources," which encompasses historic and prehistoric (archaeological) resources. Cultural resources include districts, sites, structures, artifacts, and other evidence of human use considered important to a culture or community for scientific, traditional, religious, or other reasons. Cultural resources may also include less tangible attributes such as traditional cultural places and landscapes considered sacred to particular groups, and may even include objects, records, and manuscripts.

Historical resources refer to the material and nonmaterial expressions of human adaptations that characterize the post-contact (historic) period. These resources include historic event or activity sites, historic archaeological sites, standing architecture and other significant properties, documents and other sources of historical information, objects of material culture, and houses, buildings, structures, roads, walls, and other important historic features generally greater than 50 years old.

For purposes of environmental review, cultural resources may be classified as a historical resource, *archaeological resource*, or *tribal cultural resource*. This section focuses on environmental review of historical resources. *Archaeological resources* are discussed in Section 14 and *tribal cultural resources* are discussed in Section 15.

Section 15064.5(a) of the State California Environmental Quality Act (CEQA) Guidelines defines the term "historical resources" as including the following:

a. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code (PRC) Section 5024.1; Title 14 California Code of Regulations (CCR), Section 4850 et. seq.).

b. A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in an historical resource survey meeting the requirements of PRC Section 5024.1(g), shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

c. Any object, building, structure, site, area, place, record, or manuscript which a *Lead Agency* determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the *Lead Agency's* determination is supported by *substantial evidence* in light of the whole record. Generally, a resource shall be considered by the *Lead Agency* to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC Section 5024.1; Title 14 CCR, Section 4852) including the following:

    1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

2) Is associated with the lives of persons important in our past;

3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

4) Has yielded, or may be likely to yield, information important in prehistory or history.

d. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to PRC Section 5020.1(k)), or identified in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)) does not preclude a *Lead Agency* from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

Additionally, PRC Section 5020.1(j) describes a historical resource as including, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

13.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following threshold of significance specified below.

HIS-1 A project may have a significant impact if it would result in a substantial adverse change in the mandatory significance, presumptive significance, or discretionary significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5.

13.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 13.2, the level of impact shall be evaluated based on the appropriate assessment methodologies outlined below.

(a) Would the project cause a substantial adverse change in the mandatory significance, presumptive significance, or discretionary significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5?

The types of historical significance are defined as follows:

- **Discretionary Significance:** A historical resource may be considered significant even if it is not on a federal, state or local list if *substantial evidence* demonstrates its significance. (*League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland* (1997) 52 Cal. App. 4th 896.)
- **Mandatory Significance:** A historical resource may be considered significant if it is listed in or eligible for listing in the National Register of Historic Places or the California Register of Historical Resources.

- **Presumptive Significance:** A historical resource is presumed to be significant if it is listed on a local register of historic resources unless the preponderance of the evidence demonstrates otherwise. In Ventura County this includes County Landmarks, Sites of Merit, Points of Interest, and Districts. These are all noted in the Resource Management Agency's Accela permitting database.

Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. (State CEQA Guidelines Section 15064.5.)

The significance of a historical resource is materially impaired when a project:

a. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

b. 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 PRC Section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC Section 5024.1(g), 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.

c. Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a *Lead Agency* for purposes of CEQA.

If there is evidence that a historical resource may be materially impaired as a result of the project based on the threshold above, then the following steps shall be undertaken to determine the extent of any impacts to the resource:

13.3.1 Determine Historical Significance

Examine the Project Site

During review of discretionary project applications, the *Lead Agency* shall define the project's area of potential effect for historic buildings and structures. The *Lead Agency* shall determine the potential for the project to result in adverse effects on the significance of historical resources based on the extent of ground disturbance and site modification anticipated for the project. The potential for adverse effects to the significance of historical resources shall also be determined pursuant to the requirements and protocol set forth in the Ventura County Cultural Heritage Ordinance.

Search Existing Records

The *Lead Agency* shall contact the South Central Coastal Information Center (SCCIC) to initiate a records search that consists of an in-depth review of historical resource records (i.e. built environment, State Historic Properties Directory, National Register, California Register, California Historical Landmark, Points of Historic Interest, and prehistoric and historic archaeological records) that may be affected by a project. Also included in the records search are historical resources studies that pertain to the project area and impact radius, if any. In addition, the SCCIC will assess

the possibility of historical resources that may be affected by the project. This assessment is based on such factors as the age of historic properties; presence of structures within the project area; archaeological site distribution; and environmental setting of known historical resources in the area. The SCCIC will present the results of the records search in a letter report. The project applicant shall retain a qualified professional who meets the SCCIC's access policy in order to receive a bibliography of the literature reviewed, a copy of the records search map, and copies of reports and historical resource records if requested. Requirements to submit a records search request and information on the SCCIC's access policy are found on the SCCIC's website (see Section 13.4).

The *Lead Agency* shall also search the County's records and coordinate with Cultural Heritage Board (CHB) staff to ensure that all known historical resources have been properly identified. The Ventura County Resource Management Agency (RMA) Planning Division has logged all surveyed historical resources by Assessor's Parcel Number in the Accela permitting database. The RMA Planning Division also maintains historical surveys on the CHB website that cover the limited areas of the county surveyed previously.

If a resource does not show on the RMA Planning Division's Accela permitting database and there is a building or other resource on the property, the *Lead Agency* should request documentation as to whether it is over 50 years old. This general information should be obtained from the applicant during the application review process.

Verify Historical Resource(s)

If the field survey or record search determines that a historical resource may exist on the property, the following process shall be followed to evaluate the historical significance of the resource. If deemed necessary, the project applicant may retain a qualified professional that meets the professional qualifications standards from Article 19 of the Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation" used by the National Park Service and published in the Code of Federal Regulations, 36 CFR Part 61. The most recent qualification standards are available online (see Section 13.4). The qualifications define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. In some cases, additional areas or levels of expertise may be needed depending on the complexity of the task and the nature of the historic properties involved.

Before altering a building or structure, or otherwise affecting a site containing a building or structure 50 years old or older, the project applicant shall consult with CHB staff and, if deemed necessary, retain a qualified professional that meets the qualification standards included in Article 19 of the Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation" to complete a California Department of Parks and Recreation (DPR) 523 Form or equivalent documentation if the building or structure has not previously been evaluated. The building or structure's significance shall be assessed by the qualified professional using the significance criteria set forth for historical resources under State CEQA Guidelines Section 15064.5 when completing DPR Form 523. The evaluation process shall include the development of appropriate historical background research as context for the assessment of the significance of the structure in the county and the region. The *Lead Agency* should consult with CHB staff to determine, based on the findings of the qualified professional, whether the building or structure meets the criteria as a historical resource under PRC Section 5024.1 or the State CEQA Guidelines Section 15064.5. For buildings or structures that do not meet this criteria, no further mitigation is required. If the building or structure is not deemed a significant historical resource, the impacts of the project on the affected resource shall be considered less than significant.

If the building or structure is determined to be a significant historical resource, the *Lead Agency* shall consult with CHB staff to determine whether a Historic Resource Report is needed. If a Historic Resource Report is determined necessary, the project applicant shall retain a qualified professional to prepare a Historic Resource Report consistent with the RMA Planning Division's recommended report format. The Historic Resource Report shall provide recommendations for any proposed work based on existing conditions and preservation objectives on the significant historical resource, designated *cultural heritage sites*, or those potentially eligible for designation; assess whether a project would have a substantial adverse change on the significance of such historical resource, *cultural heritage site*, or potential site; and recommend appropriate action in compliance with the Secretary of the Interior's "Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" and the Secretary of the Interior's "Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings." The purpose of these standards is to provide guidance to property owners and building managers, preservation consultants, architects, contractors, project reviewers, and other design professionals prior to beginning any work.

13.3.2 Impact Analysis

Should a building or structure of historical significance be identified, the CHB shall be provided an opportunity to review the project and the Historic Resource Report (if deemed necessary), and determine whether the project may cause a substantial adverse change in the significance of a historical resource. The CHB shall recommend to the *Lead Agency* *feasible* measures to mitigate substantial adverse changes in the significance of a historical resource.

If the *Lead Agency*, exercising independent judgment, finds that the project may cause a substantial adverse change in the significance of the historical resource, the applicant shall be advised about potential changes to the project design and/or *feasible* mitigation measures that would reduce the impact to less than significant. The applicant must agree to such project revisions and/or mitigation measures in writing before a Mitigated Negative Declaration is released for public review.

Cumulative Impact Analysis

An area one quarter mile in radius (that is used by the SCCIC) surrounding the project site should be used to determine whether there has been any past, present, and reasonably foreseeable probable future projects that have, or would result in, significant adverse impacts to any significant historical resources. These impacts should be listed and cumulatively analyzed with any identified individual project impacts.

Effect on Adjacent Sites

In determining whether the project may have an effect on the site, the *Lead Agency* must consider whether the project may have an effect on the surrounding *adjacent* sites. This may also be a consideration when a new project is *adjacent* to a historical resource. For example, construction of a new house in the midst of an entire block of historic homes in a documented historic area may be a significant impact. The compatibility of the design of the new house with its surroundings must be considered and analyzed.

In complex cases, the *Lead Agency* may request additional evaluation from the qualified professional retained by the applicant.

13.3.3 Mitigation

Avoidance of impacts to and preservation in place of the resource is the preferable strategy. A project that closely adheres to the Secretary of the Interior's "Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings" and the Secretary of the Interior's "Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings" shall be considered as mitigated to a level of less than significant impact on the historical resource.

After soliciting advisory input from the CHB as set forth above, the *Lead Agency* shall identify project changes and *feasible* measures to mitigate substantial adverse changes to the significance of a historical resource. The *Lead Agency* shall ensure that any adopted measures to mitigate or avoid substantial adverse changes are fully enforceable and implemented through permit conditions, agreements, or other measures. In addition, the *Lead Agency* shall require, as appropriate, that the property owner place an appropriate marker on the project site to describe the historical significance of the structure, site, or event.

Documentation and/or data recovery shall not be required for a historical resource if the *Lead Agency* determines that previous testing or studies have adequately recovered the historically or scientifically consequential information from and about the historical resource, provided that the determination is documented in the environmental document and the studies are submitted with the SCCIC.

Mitigation measures, including but not limited to those identified in General Plan Program COS-JJ below, shall be implemented where applicable:

a. The preferred treatment for historical resources is avoidance of impacts to and preservation in place of the resource. If impacts cannot be avoided, the applicant shall reconsider project plans in light of the high value of the resource and implement more substantial modifications to the scope of the proposed project that would allow the structure to be preserved intact. These could include project redesign, relocation, or withdrawal of the project.

b. If the building or structure can be preserved on site, but remodeling, renovation, or other alterations are required, this work shall be conducted in compliance with the Secretary of the Interior's "Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings."

   If the *Lead Agency* determines that preservation and reuse of the historical resource is not *feasible*, or the impact resulting from demolition or destruction cannot be fully mitigated, the *Lead Agency* shall ensure that a qualified professional thoroughly documents the building and associated landscape and setting. Documentation shall include still and video photography and a written documentary record/history of the building to the standards of the Historic American Building Survey or Historic American Engineering Record, including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. Incorporation of new technology and interpretive programming may also be used to document the historical resource proposed for major alteration, renovation, relocation, and/or demolition. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site specific and comparative archival research, and oral history collection as appropriate. For projects that are subject to environmental review under the National Environmental Policy Act and Section 106 of the National Preservation Act, the record shall be prepared in

consultation with State Historic Preservation Officer and filed with the California Office of Historic Preservation.

In the event of demolition, mitigation is still required even if mitigation measures would not fully offset the impact. Mitigation may include, but may not be limited to, the following:

- Still and video photography and a written documentary record/history of the building to the standards of the Historic American Building Survey or Historic American Engineering Record.
- The incorporation of architectural designs and features that reflect the historical and cultural traditions characteristic to the area or community in any proposed development as part of the discretionary project.
- A plaque or marker commemorating the building.

13.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
Article 19 of the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation	National Park Service	Website
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
California Register of Historical Resources	California Office of Historic Preservation	Website
DPR 523 Forms	California Office of Historic Preservation	Website
Historic American Buildings Survey and Historic American Engineering Record Documentation Guidelines	National Park Service	Website
National Register of Historic Places	National Park Service	Website
Secretary of the Interior's "Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings"	National Park Service	Website

Source	Managing Agency/Organization	Online Access
Secretary of the Interior's "Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings"	National Park Service	Website
Ventura County Cultural Heritage Ordinance	Ventura County RMA Planning Division	PDF | Website
Ventura County General Plan, Conservation and Open Space Element	Ventura County RMA Planning Division	PDF | Website
Ventura County Cultural Heritage Board	Ventura County RMA	Website

14. Archaeological Resources

14.1 BACKGROUND AND CONTEXT

This section evaluates the potential impacts on known and unknown *archaeological resources* and human remains. For evaluations of historical resources, refer to Section 13. For evaluations of *tribal cultural resources*, refer to Section 15.

14.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

ARC-1 A project may have a significant impact if it would cause a substantial adverse change in the significance of an *archaeological resource*.

ARC-2 A project may have a significant impact if it would result in the disturbance of human remains, including those interred outside of formal cemeteries.

14.3 IMPACT ANALYSIS

In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 14.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

14.3.1 Tribal Notice and Start of Consultation

Assembly Bill (AB) 52, enacted in 2014, requires a *Lead Agency* to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requests in writing to the *Lead Agency* to be informed by the *Lead Agency* of proposed projects in that geographic area, and the tribe requests consultation prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report (EIR) is required for a project. Per Public Resources Code (PRC) Section 21080.3.(d), the *Lead Agency* shall contact tribes that requested notification for any projects within their affiliated geographic area within 14 days of a determination of a complete application. The tribe(s) has 30 days to request consultation. Additional guidance on the tribal consultation process pursuant to AB 52 is provided in Section 14.

In addition, any General Plan Amendment or Specific Plan requires a 90-day notice to Native American tribes pursuant to Government Code Section 65352.3(a). Contact the Native American Heritage Commission to obtain the latest list of tribes that have requested notification (do not use a previously prepared list from another project). A form for this purpose can be found online (see

Section 14.4). Tribes may request a formal consultation during this 90-day period. If a tribe requests consultation, this must take place between governments and cannot be deferred to a consultant. The *Lead Agency* is required to negotiate in good faith, but is not required to agree with the tribes. A resolution strategy for project environmental impact concerns can include mitigation measures and conditions. See additional guidelines provided by the Governor's Office of Land Use and Climate Innovation (LCI), formerly known as the Office of Planning and Research, in its Tribal Consultation Guidelines Supplement to its General Plan Guidelines.

The *Lead Agency* shall consult with any California Native American tribe that has requested consultation and may incorporate the results of the consultation process in the assessment of *archaeological resources* and *tribal cultural resources* as outlined below. Projects within the Coastal Zone should refer to Section 8173.30 et seq. of the Coastal Zoning Ordinance for guidance on evaluating impacts to the significance of *archaeological resources*.

14.3.2 Initial Evaluation

The *Lead Agency* shall conduct a search of agency records and those of the Ventura County Resource Management Agency (RMA) Planning Division (e.g., permit files and Ventura County *Resource Management Agency Geographic Information System Viewer*) to determine whether the defined project impact area has undergone a Phase I Inventory. The defined project impact area is the area proposed to be disturbed directly and indirectly by the project, including, but not limited to all *development envelopes*, access roads, subsurface structures, well sites, trenching sites, or other ground disturbance sites involving clearing or grading of land and sub-surface disturbance. Examples include foundation trenching, tree removal, any pipe, flume, conduit, siphon, aqueduct, water sprinklers, power lines, fiber optic cables, fencing, and other like activities. If a Phase I Inventory was conducted for the project impact area, the findings and recommendations shall be reviewed and verified by the *Lead Agency*. If the project impact area is undeveloped and no archaeological survey has been conducted, or portions of the project impact area were not included in a previous Phase I Inventory, the *Lead Agency* shall conduct a Phase I Inventory for all or such portion of the project impact area.

Projects that would not have the potential for impacts on cultural resources such as mergers, minor lot line adjustments, or alteration to an already developed site are not required to conduct a Phase I Inventory or prepare a Phase I Inventory Report.

14.3.3 Phase I Inventory

A Phase I Inventory shall be prepared by a qualified archaeological consultant retained by the applicant and shall include a records search and Sacred Lands File search with the South Central Coast Information Center (SCCIC), as well as a surface survey. The project applicant shall be responsible for the cost of the records search and Sacred Lands File Search. The extent of the area to be searched for records shall be determined in consultation with the qualified archaeological consultant.

A qualified archaeological consultant is a professional that meets the qualification standards included in Article 19 of the Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation" used by the National Park Service and published in the Code of Federal Regulations, 36 CFR Part 61. The most recent qualification standards are available online (see Section 14.4). The qualification standards define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. In some cases, additional areas or levels of expertise may be needed depending on the complexity of the task and the nature

of the *archaeological resources* involved. In addition to the qualification standards from Article 19 of the Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation," the qualified archaeological consultant shall also meet the following qualifications:

- **Local and State Expertise:** Principal Investigators must provide evidence of expertise and/or theoretical or descriptive interest in local and regional pre-history. Demonstrated knowledge of Chumash pre-history is required.
- **Professional Certification:** Evidence of professional certification is highly desirable. Certification in field research by the Register of Professional Archaeologists is an example.

Surface Survey

Any surface survey to determine the presence or absence of *archaeological resources* shall be conducted by a qualified archaeological consultant in coordination with the *Lead Agency*. The purpose of the surface survey is to chronicle the physical characteristics of the site and setting, and to determine whether historical or *archaeological resources* are present and may be impacted by a proposed project. Should the qualified archaeological consultant recommend conducting site investigations that may result in subsurface ground disturbance, the qualified archaeological consultant shall work with the *Lead Agency* to determine subsurface exploration techniques and whether special approvals or permits would be required prior to conducting the site investigation.

Phase I Inventory Report

After a Phase I Inventory has been completed, a Phase I Inventory Report shall be prepared by a qualified archaeological consultant and submitted to the *Lead Agency*.

A Phase I Inventory Report should contain the following information:

1. An overview of the archaeological context within which to evaluate the type, nature and significance of prehistoric resources (i.e. material remains of Native American societies and their activities) or ethnohistoric resources (i.e. Native American settlements occupied after the arrival of European settlers in California) that may be encountered in the project impact area;
2. A historical context to determine if any *archaeological resources* meet the criteria for a historical resource (see Section 13, Historical Resources) or *unique archaeological resource*. The determination as to whether an archaeological site qualifies as a historical resource or a *unique archaeological resource* should be based on the evidence gathered and presented for each specific site and should be made by the *Lead Agency* based on the evidence provided by the qualified archaeological consultant;
3. A description of how the surface survey was conducted;
4. An assessment identifying the importance or absence of subsurface *archaeological resources* and any potential effects from the proposed development on *archaeological resources*;
5. Resource management recommendations, which may include a determination of the potential for encountering *archaeological resources* (e.g., low, moderate, or high potential);
6. A summary of the results of the records search; and
7. Official State DPR 523 forms (i.e., Building, Structure and Object Record, Archaeological Site Record and/or District Record) if *archaeological resources* are encountered.

A copy of the Phase I Inventory Report should be filed with the SCCIC and shared with a Native American tribe, if requested by that tribe, during the applicable tribal consultation process described above. Where, as a result of the Phase I Inventory, the qualified archaeological consultant determines in consultation with the *Lead Agency*, that the potential for encountering *archaeological resources* is low, no further analysis is required. However, the project should be conditioned that in the event of an unanticipated discovery, construction shall be halted in the area of the find and the permittee shall contact the *Lead Agency*, the qualified archaeological consultant, and the State Historic Preservation Officer to assess the significance and treatment options.

Where, as a result of the Phase I Inventory, the qualified archaeological consultant determines in consultation with the *Lead Agency*, the archaeological site is also a historical resource, then the *Lead Agency* shall consult with the qualified archaeological consultant, the Ventura County Cultural Heritage Board, and the State Historic Preservation Officer to develop a plan for mitigating the adverse effects of the project on the significance of the resource. The mitigation plan shall be consistent with the mitigation guidelines provided in Section 13, Historic Resources, with an emphasis on avoiding impacts to the resource and preserving it in place.

14.3.4 Phase II Evaluation

A Phase II Evaluation includes further investigation of *archaeological resources* that were identified in the Phase I Inventory Report in order to determine the significance of those resources and to determine impacts of the project on the significance of those resources. A Phase II Evaluation shall be required where a Phase I Inventory Report identifies a moderate to high potential for encountering significant *archaeological resources* in the project impact area.

The *Lead Agency* may waive the preparation of a Phase II Evaluation if the following conditions are met:

- Based upon *substantial evidence*, the *Lead Agency* determines that although the Phase I Inventory indicates that prehistoric or ethnohistoric resources are present, it is unlikely that the project site will contain *archaeological resources* (as for example, where the site is in an area of low density of artifacts or other remains, the suspected amount of the site deposit to be disturbed is small, or where it appears the artifacts or other remains have been historically redeposited);
- Project applicant provides monitoring of all excavation and trenching by a qualified archaeological consultant and qualified Native American monitor, chosen in consultation with the Native American Heritage Commission if the resource is significant to Native American prehistory or history; and
- A qualified archaeological consultant prepares a Construction Monitoring Plan that includes procedures for archaeological and Native American monitoring of all earth-moving activities related to project construction; an action plan for treating discoveries of archeological resources including sampling procedures to be used, data recovery methods to be employed, and the anticipated approach to post-field data analysis and reporting.

Prior to a Phase II Evaluation, the applicant in consultation with the qualified archaeological consultant, shall provide a written scope of work for the review and approval of the *Lead Agency* that details the recording, mapping, collection procedures, time frames, and cost. Earth disturbing activities associated with the Phase II Evaluation shall be confined to the direct area of the project's potential effects except when otherwise indicated in the approved scope of work.

During the Phase II Evaluation, the qualified archaeological consultant shall recover sufficient samples to allow the formulation of complete interpretations regarding the spatial disposition of artifacts across the site, as well as the likely age and function of discreet components or activity areas within the site. The evaluation shall consist of the following:

- Subsurface exploration techniques including hand and/or auger excavations, and shovel test pits or trenches, as determined by the qualified archaeological consultant;
- A delineation of the site boundaries of the *archaeological resources*;
- A detailed analysis of the material recovered; and
- An assessment of resource integrity.

Phase II Evaluation Report

The completion of the Phase II Evaluation shall include the preparation of a report on the results of the investigation, impact analysis, mitigation recommendations relating to the proposed project, and any other recommendations of the qualified archaeological consultant.

At the discretion of the *Lead Agency*, Phase II Evaluation Reports may be reviewed by an outside archaeological consultant. Any peer review shall be conducted by a qualified archaeological consultant selected by or approved by the *Lead Agency* and paid for by the project applicant.

The Phase II Evaluation Report shall not be included in the environmental document of the project if general circulation of the report would jeopardize the integrity of those resources, possibly resulting in vandalism or unwarranted trespass on private property. The environmental document may include a summary of the conclusions of the report.

Determining Significance of the Resource

When a project will impact an archaeological site, a *Lead Agency* shall first determine whether the site is a historical resource. An archaeological site may be considered an historical resource if it is any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California pursuant to PRC Section 5020.1(j), or if it meets the criteria for listing on the California Register (14 CCR Section 4850).

Archaeological sites may be historic or prehistoric in age. Pursuant to CEQA, archaeological sites may qualify as a historical resource or *tribal cultural resource*, or both. If a *Lead Agency* determines that the archaeological site is an historical resource, it shall refer to the provisions of PRC Section 21084.1 and State CEQA Guidelines Sections 15064.5(c) and 15126.4. The limits contained in PRC Section 21083.2 do not apply.

If an archaeological site does not meet the criteria defined in State CEQA Guidelines Section 15064.5(a) but meets the definition of a *unique archeological resource* in PRC Section 21083.2, the site shall be treated in accordance with the provisions of PRC Section 21083.2. The time and cost limitations described in PRC Sections 21083.2(c) to 21083.2(f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains *unique archaeological resources*.

If an *archaeological resource* is neither a *unique archaeological resource* nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the Initial

Study or EIR, if one is prepared, to address impacts on other resources, but they need not be considered further in the CEQA process. Note that a *unique archaeological resource* or a *nonunique archaeological resource* may qualify as a *tribal cultural resource*. If a resource meets the definition of a *tribal cultural resource*, then it is a significant historical resource pursuant to CEQA. Refer to Section 15, Tribal Cultural Resources, for guidance concerning meaningful consultation regarding *tribal cultural resources* that must take place with California Native American tribes, should they request such consultation, on a project-by-project basis (PRC Section 21080.3.1).

The significance of an *archaeological resource* is materially impaired when a project:

- 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 PRC Section 5020.1(k), or its identification in an archaeological or cultural resources survey meeting the requirements of PRC Section 5024.1(g), 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
- 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.

Cumulative Impact Analysis

According to CEQA, the importance of cultural resources comes from the research value and the information that they contain. Therefore, the issue that must be explored in a cumulative analysis is the cumulative loss of that information. For sites considered less than significant, the information is preserved through recordation and test excavations. Significant sites that are placed in protected open space easements avoid impacts to cultural resources and preserve the data. Significant sites that are not placed within open space easements preserve the information through recordation, test excavations and data recovery programs that would be presented in reports and filed with the County and the SCCIC. The artifact collections from any potentially significant site would be curated at a local museum and must be available to other archaeologists for further study.

Previous environmental reviews for projects in the relevant area should be examined to see whether there was a significant impact. The area for examination should be the same one-quarter mile radius used by the SCCIC for their report.

14.3.5 Phase III Mitigation

Phase III Mitigation constitutes the carrying out of mitigation measures associated with project implementation. A Phase III archaeological mitigation plan for the treatment of impacted *archaeological resources* shall be prepared when the project may adversely affect the significance of an *archaeological resource*.

Complete avoidance or in-situ preservation of a site is the preferred manner of avoiding damage to *archaeological resources*. To the extent that *unique archaeological resources* are not preserved in place or not left in an undisturbed state, mitigation measures must be adopted pursuant to PRC Section 21083.2(c).

Appropriate mitigation measures to preserve the resources in place or in an undisturbed state may include:

- Planning construction to avoid archaeological sites;
- Planning parks, green space, or other open space to incorporate archaeological sites;
- Capping or covering archaeological sites only when avoidance is not possible and until its "importance" has been evaluated and its boundaries mapped. Capping should be done with a sufficiently thick protective layer of soil that can contain all types of utility trenches and other ground disturbances before building tennis courts, parking lots or other paved surfaces;
- Deeding archaeological sites into permanent *conservation instrument* or other legal instruments recorded with the Office of Ventura County Recorder in the property's chain of title; and
- Partial or total recovery of resources.

In some instances, capping would not be *feasible* due to local soil conditions or because the building weight would damage the site by compaction. Deed restrictions may be required to prevent future excavations below the fill.

If avoidance or in-situ preservation is not *feasible*, partial or total recovery of *archaeological resources* shall be conducted pursuant to the recommendations included in the Phase I and II reports approved by the *Lead Agency*.

Where the qualified archaeological consultant determines that the project may adversely affect *archaeological resources* that yield or have the potential to yield significant information regarding prehistory or history only with archaeological methods, and therefore data recovery necessary for cultural and scientific discovery would serve as the primary mitigation method, with the approval of the *Lead Agency*, a Phase III archaeological mitigation plan for the treatment of impacted *archaeological resources* shall be prepared. The Phase III archaeological mitigation plan shall be prepared by the qualified archaeological consultant and shall include a Data Recovery Plan that proposes how the archaeological excavation will be carried out, and shall require the preparation of a Data Recovery Report summarizing the results of the archaeological excavation(s).

The Data Recovery Plan shall include but not be limited to the following:

- The nature and purpose of the Data Recovery Plan, dates of the fieldwork, names, titles, and qualifications of personnel involved, and nature of any permits or permission obtained;
- The level of excavation needed;
- The analytical protocols for the data;
- Detailed notes, photographs, and drawings of all excavations and soil samples; and
- The location of where *archaeological resources* will be curated.

A follow-up Data Recovery Report shall be submitted to the *Lead Agency* following the archaeological excavation detailing the implementation of the Data Recovery Plan and recovery measures that were performed, including the integrity of the site deposits and any other information, as necessary.

Any concerned Native American tribe shall be provided with a copy of proposed mitigation measures upon request.

Monitoring

For discretionary projects, the *Lead Agency* shall require the following:

- Projects shall be designed to protect existing resources and shall avoid potential impacts to the maximum extent *feasible*.
- If determined necessary by the *Lead Agency*, an archaeological and/or Native American monitor shall be retained to monitor ground-disturbing activities during construction.
- If any materials or artifacts are discovered during ground disturbance and/or construction activities, construction shall halt until a qualified archaeological consultant or Native American monitor can access the discovery. A report or memorandum shall be prepared by the qualified monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources.

Recommendations or mitigation identified by the qualified monitor shall be implemented if deemed *feasible* by the *Lead Agency* prior to commencing or continuing project activities and/or construction.

If the find is determined to be a *unique archaeological resource*, the project shall allow for contingency funding and a time allotment sufficient to recover a sample or to employ one of the avoidance measures noted above. Construction work may continue on other parts of the building site while archaeological mitigation takes place pursuant to PRC Section 21083.2(i).

Security Measures

During project-level ground disturbance activities for discretionary development in areas where *tribal cultural resources* are known to be present, project sites shall be secured during non-construction hours to ensure that the unauthorized access and the unlawful curation of fossil materials or *tribal cultural resources* does not occur. Such security measures may include construction fencing, unauthorized access signage, security lighting, and security cameras. For large-scale development, a security plan may be prepared prior to construction activities to detail security measures and protocol for the project site.

14.3.6 Initial Study Checklist

The Initial Study Checklist includes the following questions pertaining to environmental impacts on the significance of cultural resources, including *historical resources* and *unique archaeological resources*.

(a) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to state CEQA Guidelines Section 15064.5?

Substantial adverse change in the significance of the resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the resource would be materially impaired. (State CEQA Guidelines Section 15064.5.)

A determination of **No Impact** shall be made if the project does not appear to have the potential for impacts on cultural resources.

A determination of **Less Than Significant Impact (LS)** shall be made if a Phase I Inventory Report does not indicate a substantial adverse change to the significance of known and probable presence of cultural resources, including *historical resources* and *unique archaeological resources*.

A determination of **Less Than Significant with Mitigation Incorporated (LS-M)** shall be made if the Phase II Evaluation Report indicates a project-specific or cumulative substantial adverse change to the significance of a cultural resource, including *historical resources* and *unique archaeological resources*. However, mitigation measures have been identified which will reduce the impacts to a less than significant level.

A determination of **Potentially Significant Impact (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would result in a substantial adverse change to the significance of a cultural resource, including historical resources and *unique archaeological resources*.

(b) Would the project result in the disturbance of human remains, including those interred outside of dedicated cemeteries?

A determination of **No Impact** shall be if it has been determined with certainty that the project would not result in the disturbance of human remains.

A determination of **Less Than Significant Impact (LS)** shall be made accordingly if it is unlikely that the project would result in the disturbance of human remains.

A determination of **Less Than Significant with Mitigation Incorporated (LS-M)** shall be made if it is likely that the project would result in the disturbance of human remains. However, mitigation measures have been identified which will reduce the impacts to a less than significant level.

A determination of **Potentially Significant Impact (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would result in the disturbance of human remains.

14.3.7 Other Issues

Cost Constraints

Costs of mitigation measures shall be determined by the limits imposed in PRC Section 21083.2(c) to 21083.2(f). Such limits do not apply to Phase I Assessments, nor to Phase II Assessments that seek to determine the significance of the cultural resource in question.

Discovery of Human Remains

To address the potential for any inadvertent disturbance of human remains with grading activities during project construction, standard mitigation measures should be a part of environmental documents, such as the following example mitigation measure:

> "If human remains are exposed during construction, the *Lead Agency* shall be notified immediately. The applicant and *Lead Agency* shall comply with State Health and Safety Code Section 7050.5, which states that no further disturbance shall occur until the County Coroner has been notified and can make the necessary findings as to origin and disposition of the remains pursuant to PRC Section 5097.98. Construction shall halt around the discovery of human remains, the area shall be protected, and consultation and treatment shall occur as prescribed by law."

If human remains are encountered, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie *adjacent* remains shall occur until the County Medical Examiner has been contacted. If the County Medical Examiner determines that the human remains

are those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact the Native American Heritage Commission by telephone within 24 hours.

Upon the discovery of Native American remains, measures shall be taken to ensure that the immediate vicinity is not damaged or disturbed by further development activity until the most likely descendants are identified and consulted with regarding the descendants' preferences and all reasonable options for treatment and disposition of the remains, in accordance with PRC Section 5097.98.

The landowner or his or her authorized representative shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance when one or more of the following occurs:

- The Native American Heritage Commission is unable to identify a descendant;
- The descendants identified fail to make a recommendation; or
- The landowner or his or her authorized representative rejects the recommendation of the descendants, and, if invoked, the mediation provided for in subdivision (k) of PRC Section 5097.94 fails to provide measures acceptable to the landowner.

To protect the sites, the landowner shall record the site with the Native American Heritage Commission, SCCIC, and/or the Regional Historical Resources Information System.

Burials

If there is a potential for disturbance of any Native American burial remains, at least one Native American monitor shall be selected by the qualified archaeological consultant from among the known descendants of the site's population or from a list obtained from the Native American Heritage Commission. The Native American tribe(s) shall be consulted with regards to disposition of any remains encountered, with the goal of reaching consensus prior to any necessary excavation or disturbance. In addition, the County Coroner must be notified whenever human burials are encountered. The Native American Heritage Commission should be contacted whenever a burial is encountered.

Construction Effects

The project should include standard conditions for resources accidentally discovered during construction. These conditions should include an immediate evaluation of the find by a qualified archaeological consultant. If the find is determined to be significant, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation should be made a condition of approval. Work may continue on other parts of the building site while mitigation takes place.

Monitors

If determined necessary by the *Lead Agency*, an archaeological and/or Native American monitor shall be retained to monitor ground-disturbing activities during construction. Additionally, the monitor shall be present during work on any archaeological site which is considered important to any Native American tribe, if this is requested by the Native American tribe. Qualified archaeological consultants shall have the responsibility of selecting monitors from a list obtained from the Native

American Heritage Commission. Compensation of Native American monitors should conform to the consultant's current rate for field personnel (crew members) and shall be paid by the applicant.

Conflicts regarding the number of monitors required and tribal affiliation issues shall be determined by consultation among the *Lead Agency* and the qualified archaeological consultant. The *Lead Agency* shall make any final determinations if such conflicts cannot be resolved at the staff level.

Confidentiality

Consistent with the guidelines developed and adopted by LCI pursuant to Government Code Section 65040.2, the County shall protect the confidentiality of information concerning the specific identity, location, character, and use of those places, features, and objects (Government Code Section 65352.3).

Reporting Requirements

A copy of any report generated by a Phase I Inventory, Phase II Evaluation, or Phase III Mitigation or mitigation of any project under the purview of the *Lead Agency* shall be forwarded by the qualified archaeological consultant to the SCCIC and to the Ventura County Archaeological Society, and filed in a confidential sub-folder within the case file for the project. Any other information about the archaeological site or its location obtained in any way shall be filed there.

Cumulative Impacts

Past, present, and reasonably foreseeable probable future projects should be included in the evaluation of cumulative impacts on the significance of *archaeological resources*.

14.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
Assembly Bill 52	State of California	Website
AB 52 and Tribal Cultural Resources in CEQA	California Governor's Office of Land Use and Climate Innovation (LCI), formerly Office of Planning and Research	PDF | Website
Article 19 of the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation	National Park Service	Website
California Environmental Quality Act	LCI	Website

Source	Managing Agency/Organization	Online Access
California Historical Resources Information System	California Office of Historic Preservation	Website
California Register of Historical Resources	California Office of Historic Preservation	Website
Coastal Zoning Ordinance	Ventura County RMA Planning Division	PDF | Website
DPR 523 Forms	California Office of Historic Preservation	Website
Native American Heritage Commission Forms	Native American Heritage Commission	Website
Tribal Consultation Guidelines, Supplement to General Plan Guidelines	LCI	PDF | Website
Ventura County RMA Geographic Information Systems Viewer	Ventura County Information Technology Services	Website
Ventura County Cultural Heritage Board	Ventura County RMA Planning Division	Website

15. Tribal Cultural Resources

15.1 BACKGROUND AND CONTEXT

Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. This section evaluates the potential impacts on known and unknown *tribal cultural resources*. On July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted. Under AB 52, if a California Native American tribe requests in writing to the *Lead Agency* to be informed of proposed projects in a geographic area that is traditionally and culturally affiliated with the tribe, and the tribe requests consultation prior to determining which CEQA document would be required for a project, the *Lead Agency* shall begin consultation with that tribe. The bill makes these provisions applicable to projects that have a notice of preparation, a notice of negative declaration, or mitigated negative declaration on or after July 1, 2015.

15.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following threshold of significance specified below.

TRI-1 A project may have a significant impact if it would cause a substantial adverse change in the significance of a *tribal cultural resource*.

15.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 15.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below. These guidelines are not intended, and may not be construed, to limit consultation between the state and tribal governments, existing confidentiality provisions, or the protection of religious exercise to the fullest extent permitted under state and federal law.

Tribal Consultation

A critically important aspect of the evaluation and treatment of *tribal cultural resources* is consultation with Native American tribes that have been recognized by the Native American Heritage Commission, and that have requested to have such consultation with the *Lead Agency*. It is the obligation of the *Lead Agency*, not a professional consultant, to carry out the consultation process when a tribe has formally requested consultation. If the project applicant or professional consultants participate in the consultation, those parties shall respect the principles of the consultation as set forth in as set forth in Public Resources Code (PRC) Section 21080.3.1.

The process to initiate tribal consultation shall be consistent with PRC Section 21080.3.1 and 21080.3.2, which generally consists of the following steps:

a. Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the *Lead Agency* shall provide formal notification to the California Native American tribe(s) that has requested to the *Lead Agency*, in writing, to be informed of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe(s). The *Lead Agency* may contact the Native American Heritage Commission to request assistance with identifying the California Native American tribes that are traditionally and culturally affiliated with the project area.

b. Formal notification shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the *Lead Agency* contact information, and a notification that the California Native American tribe has 30 days to request consultation.

c. The California Native American tribe shall respond in writing within 30 days of receipt of the formal notification to request the consultation. When responding to the *Lead Agency*, the California Native American tribe may designate a lead contact person. If the California Native American tribe does not designate a lead contact person, or designates multiple lead contact people, the *Lead Agency* may defer to the individual listed on the contact list maintained by the Native American Heritage Commission. The *Lead Agency* shall begin the consultation process within 30 days of receiving a California Native American tribe's request for consultation.

d. The California Native American tribe may request consultation regarding topics such as the type of environmental review necessary, alternatives to the project, recommended mitigation measures, or significant effects. During the consultation process, tribes may determine whether a *tribal cultural resource* is present within a project impact area (see Section 14.3.2), the significance of the *tribal cultural resource*, identify impacts on the significance of *tribal cultural resources*, or propose mitigation measures to avoid, preserve, or substantially lessen potential significant impacts to a *tribal cultural resource* (PRC Section 21080.3.2). Additional guidance on the tribal consultation process is found in the Technical Advisory Report on AB 52 and Tribal Cultural Resources dated June 2017, prepared by the Governor's Office of Land Use and Climate Innovation (LCI), formerly known as the Office of Planning and Research.

e. Should a California Native American Tribe confirm the presence of *tribal cultural resources* that may potentially be impacted by the project, the findings may be integrated into a Phase 1 Inventory and/or Phase II Evaluation, as applicable (see Section 14, Archaeological Resources), to determine the range of potential impacts to cultural resources that may be affected by the project, including historical resources, archaeological resources, and *tribal cultural resources*. More specific guidance about the evaluation of historical resources and archaeological resources is provided in Section 13, Historical Resources, and Section 14, Archaeological Resources.

f. The consultation shall be considered concluded when either (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a *tribal cultural resource*; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.

Consultation does not limit the ability of California Native American tribe or the public to submit information to the *Lead Agency* regarding the significance of the *tribal cultural resources*, the significance of the project's impact on *tribal cultural resources*, or any appropriate measures to mitigate the impact. In addition, consultation does not limit the ability of the *Lead Agency* or project proponent to incorporate changes and additions to the project as a result of the consultation, even if not legally required.

In addition, any General Plan amendment or Specific Plan requires a 90-day notice to Native American tribes pursuant to Government Code Section 65352.3(a). Contact the Native American Heritage Commission to obtain the latest list of tribes that have requested notification (do not use a previously prepared list from another project). A form for this purpose can be found online (see Section 15.4). Tribes may request a formal consultation during this 90-day period. The County is required to negotiate in good faith, but is not required to agree with the tribes. A resolution strategy for project environmental impact concerns can include mitigation measures and conditions. See additional guidelines provided by LCI in its Tribal Consultation Guidelines Supplement to its General Plan Guidelines.

Confidentiality

PRC Section 21082.3 provides for the confidentiality of information submitted by the California Native American Tribe to the *Lead Agency*, which generally states the following:

a. The California Native American tribe may engage in the confidential exchange of information regarding *tribal cultural resources* during the consultation or environmental review process among the *Lead Agency*, the California Native American tribe, the project applicant, or the project applicant's agent.

b. Unless the California Native American tribe providing the information consents in writing to public disclosure, the project applicant or the project applicant's legal advisers, using a reasonable degree of care, shall maintain the confidentiality of the information exchanged for the purposes of preventing looting, vandalism, or damage to *tribal cultural resources* and shall not disclose to a third party confidential information regarding *tribal cultural resources*.

c. Confidentiality does not apply to data or information that are or become publicly available, are already in the lawful possession of the project applicant before the provision of the information by the California Native American tribe, are independently developed by the project applicant or the project applicant's agents, or are lawfully obtained by the project applicant from a third party that is not the *Lead Agency*, a California Native American tribe, or another public agency.

d. Any information, including, but not limited to, the location, description, and use of the *tribal cultural resources*, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the *Lead Agency* to the public, consistent with Government Code Section 6254(r) and Section 6254.10, and CCR Title 14, Section 15120(d), without the prior consent of the tribe that provided the information.

e. If the *Lead Agency* publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document for public review during the public comment period, unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. The confidential appendix shall

include a general description of the information in the environmental document so as to inform the public of the basis of the *Lead Agency's* decision without breaching the confidentiality provisions under PRC Section 21082.3.

Mitigation Measures

Mitigation measures may be addressed as part of a Phase III Mitigation as outlined in Section 14, Archaeological Resources. The *Lead Agency* shall, whenever *feasible*, avoid damaging effects to any *tribal cultural resource*. If the *Lead Agency* determines that a project may cause a substantial adverse change to a *tribal cultural resource*, and measures are not otherwise identified in the consultation process, the following are examples of mitigation measures that, if *feasible*, may be considered to avoid or minimize the significant adverse impacts consistent with PRC Section 21084.3(b):

a. Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to (1) protecting the cultural character and integrity of the resource; (2) protecting the traditional use of the resource; and (3) protecting the confidentiality of the resource.

c. Permanent *conservation instrument* or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource.

If a project may have a significant impact on a *tribal cultural resource*, the *Lead Agency's* environmental document shall discuss both of the following pursuant to PRC Section 21082.3:

a. Whether the proposed project has a significant impact on an identified *tribal cultural resource*.

b. Whether *feasible* alternatives or mitigation measures, including those measures that may be agreed upon in the consultation process, that avoid or substantially lessen the impact on the identified *tribal cultural resource*. Mitigation measures should be included in an adopted mitigation monitoring and reporting program and shall be fully enforceable.

If the mitigation measures recommended by the staff of the *Lead Agency* as a result of the consultation process are not included in the environmental document, or if there are no agreed upon mitigation measures at the conclusion of the consultation, or if consultation does not occur, and if *substantial evidence* demonstrates that a project will cause a significant effect to a *tribal cultural resource*, the *Lead Agency* shall consider *feasible* mitigation pursuant to PRC Section 21084.3(b) as described above.

Preparation of Initial Study Checklist

The Initial Study Checklist includes the following questions pertaining to environmental impacts on the significance of *tribal cultural resources*.

(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource?

A determination of **Less Than Significant Impact (LS)** shall be made if there is no request for tribal consultation from any tribe and supporting evidence in the record that there is no potential for impacts on *tribal cultural resources*; or after tribal consultation and agreement by the applicable tribal entity that the project does not have the potential for impacts to *tribal cultural resources*.

If the tribal consultation process and/or the *Lead Agency* has determined that there would be a substantial adverse change or a substantial adverse cumulative impact to the significance of a *tribal cultural resource*, but mitigation measures have been developed that would reduce the impact to less than significant, then a determination of **Less Than Significant with Mitigation Incorporated (LS-M)** shall be made.

A determination of **Potentially Significant Impact (PS)** shall be made and further analysis shall be addressed in an environmental impact report if there is *substantial evidence* that the project would cause a substantial adverse change in the significance of a *tribal cultural resource*.

Environmental Document Certification

The *Lead Agency* may certify an environmental impact report or adopt a mitigated negative declaration for a project with a significant impact on an identified *tribal cultural resource* only if one of the following occurs:

a. The consultation process between the California Native American tribe and the *Lead Agency* has occurred and concluded.

b. The California Native American tribe has requested consultation and has failed to provide comments to the *Lead Agency*, or otherwise failed to engage, in the consultation process.

c. The *Lead Agency* has provided formal notification to the California Native American tribe within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake the project, and the California Native American tribe has failed to request consultation within 30 days.

15.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
Assembly Bill 52 (AB 52)	State of California	Website

Source	Managing Agency/Organization	Online Access
AB 52 and Tribal Cultural Resources in CEQA	California Governor's Office of Land Use and Climate Innovation (LCI), formerly Office of Planning and Research	PDF | Website
Native American Heritage Commission Forms	Native American Heritage Commission	Website
Tribal Consultation Guidelines, Supplement to General Plan Guidelines	LCI	PDF | Website
Tribal Cultural Resources (AB 52) Resource Page	LCI	Website

16. Land Use and Planning

16.1 BACKGROUND AND CONTEXT

This section analyzes a project's potential impacts on land use and planning by evaluating whether the project would physically divide an *established community* and/or whether the project would conflict with any land use plans, policies or regulations adopted for the purpose of avoiding or mitigating environmental impacts. When the analysis of such potential conflict is directly related to other environmental topics, (e.g., biological resources, greenhouse gas emissions, aesthetics), such analysis will be addressed in the applicable section(s) of the Initial Study.

An *established community* can often be identified by its unique *community character*. Elements of *community character* may include such factors as its built environment, natural features, architectural form and style, existing uses (e.g., agricultural, residential, commercial, industrial, or institutional), and density and intensity of development. Central to the concept of *community character* are the characteristics of a location that make it readily recognizable as being unique and different from its surroundings and that provides a feeling of belonging to, or being identified with, that particular place.

16.1.1 Established Communities and Land Use Boundaries

To assist in determining whether an *established community* will be potentially divided, it is important to describe the different types of *established communities* in unincorporated Ventura County.

Some *established communities* are within an *Existing Community Designated Area* in the Ventura County General Plan, which may include urban residential, commercial, or industrial enclaves outside of cities or other unincorporated urban centers. In addition, there are nine distinct unincorporated communities that are within an *Area Plan*. These areas also typically include residential and commercial/industrial land uses and have unique Area Plan land use designations. *Area Plans* are discussed in detail in Section 3.5 and shown on Figure 3-12 through Figure 3-24 of the Ventura County General Plan Background Report. Not all Existing Community Designated Areas are subject to an Area Plan. Boundaries of the *Existing Community Designated Areas* and the nine *Area Plans* are found in the Land Use and Community Character Element of the General Plan.

The nine *Area Plans* are:

- Coastal
- El Rio/Del Norte (includes Nyeland Acres)
- North Ventura Avenue
- Oak Park
- Ojai Valley
- Piru
- Saticoy
- Thousand Oaks
- Lake Sherwood/Hidden Valley

Although areas within an *Existing Community Designated Area* and/or within an *Area Plan* boundary may include the most easily identifiable *established communities* within Ventura County, they do not constitute all of the areas that may qualify as distinct *established communities*. Indeed, much of Ventura County consists of rural, agricultural or open space areas with lower density development

(areas with a "Rural," "Agricultural," or "Open Space" land use designation). Some of these areas could also be described as an *established community* within other planning boundaries as described in General Plan Policy LU-1.2(b) (e.g., the Oxnard Plain, and Santa Monica Mountains).

Understanding the geographic boundaries of *established communities* is important in the context of determining whether a project might physically divide a community. Similarly, understanding the *community character* of an *established community* is also important in making such a determination.

Community character can be established by such physical features as its built environment, natural features, architectural form and style, existing uses (e.g., agricultural, residential, commercial, industrial, or institutional), and density and intensity of development.

16.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

LAN-1 A project may have a significant impact if it would a) conflict with any applicable land use plan, policy, or development standard adopted for the purpose of avoiding or mitigating an environmental effect, such as the Ventura County General Plan, the applicable *Area Plan*, and applicable zoning ordinance, and b) result in a significant adverse environmental effect due to that conflict.

LAN-2 A project may have a significant impact if it would introduce physical development that would physically divide an *established community* or is substantially incompatible with existing land uses, architectural form or style, site design/layout, or density/intensity within the *established community* in which the project is located.

16.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 16.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project a) conflict with any applicable land use plan, policy, or development standard adopted for the purpose of avoiding or mitigating an environmental effect, such as the Ventura County General Plan, the applicable Area Plan, and applicable zoning ordinance, and b) result in a significant adverse environmental effect due to that conflict?

This section is intended for discussions of impacts related to land use. Several goals, policies, and development standards in the applicable land use plan or ordinance may be directly related to other environmental topics as discussed in other sections of the Initial Study (e.g., biological resources, greenhouse gas emissions, aesthetics, etc.). As such, discussions of conflicts with such goals and policies may be discussed in the applicable section of the Initial Study.

To determine whether a proposed project would be consistent with applicable land use plans, policies, and development standards, the *Lead Agency* shall determine if the proposed use, structures, and improvements are consistent with:

- Land use designation(s) shown on the General Plan Land Use Diagram and/or *Area Plan* Land Use Diagram(s).
- Development standards found in the Coastal Zoning Ordinance or Non-Coastal Zoning Ordinance.
- All goals and policies found in the General Plan, Local Coastal Program, and/or applicable *Area Plan*.

When making a consistency determination, the *Lead Agency* shall complete a comparison table that includes, but is not limited to, the following: citation for applicable policy document and section, the policy text as adopted, and a consistency analysis for each policy listed. See Table 16-1 below for an example of a policy consistency analysis table.

Table 16-1. Policy Consistency Analysis Template

Document Name / Section	Policy Text	Consistency Analysis
General Plan / Area Plan **Section #**	Policy #: "policy text"	The proposed project is/is not consistent with this policy requirement and therefore does not/ does result in significant impacts because…

(b) Would the project introduce physical development that would physically divide an established community or is substantially incompatible with existing land uses, architectural form or style, site design/layout, or density/intensity within the established community in which the project is located?

Established communities for the purpose of this analysis includes those areas described in Section 16.1 above and include lands within the boundaries of an *Existing Community Designated Area*, an *Area Plan*, areas within other planning boundaries as described in General Plan Policy LU-1.2(b), or other unincorporated communities outside of these boundaries.

The *Lead Agency* shall evaluate the project for any proposed development and other physical changes that would have the potential to divide an *established community*. Such development or physical changes may include, but are not limited to, infrastructure (e.g., roadways, utilities) or other incompatible land uses (e.g., airports) that would be developed within an *established community*, or that would change the boundary of the *Existing Community Designated Area*, *Area Plan*, or areas within other planning boundaries as described in General Plan Policy LU-1.2(b) in a manner that is inconsistent with the Guidelines for Orderly Development. For example, potential impacts may arise from constructing a new or expanded heavily travelled roadway through an *established community*, or from a project that introduces significant differences in the physical scale of development, differences in noise levels or hours of operation from existing *adjacent* uses.

The degree to which a particular project's existing land uses, architectural form or style, site design/layout, or density/intensity is compatible with the character of an *established community* shall be based on *substantial evidence* that is included as part of the public record for the project. *Substantial evidence* may be acquired through a site visit to ascertain the defining existing land uses,

architectural form or style, site design/layout, or density/intensity within the *established community* where the project is located. Photo documentation should be included as part of the public record for the project.

The *Lead Agency* shall also consult the Official Zoning Data (viewable through *County View* and the *Resource Management Agency Geographic Information System Viewer*) and General Plan/Area Plan Land Use Diagrams to:

- Determine land use designation and zone classification for the project and the surrounding area; and
- Determine the goals, policies, or development standards relating to land use and *community character* in the General Plan, applicable *Area Plan*, and applicable zoning ordinance that apply to the project.

In certain situations (e.g., projects located within communities with distinct architectural form/styles or within the Scenic Resource Protection (SRP) Overlay Zone), the *Lead Agency* may need to request visual simulations from the project applicant in order to evaluate the degree to which the project is compatible with the surrounding *community character*.

Finally, the *Lead Agency* shall obtain a list of past, present, and reasonably foreseeable probable future projects that are located within the same *established community* as the project in order to assess the project's contribution to cumulative impacts on land use and *community character*.

Determinations as to the significance of the project's impact on land use and *community character* should be made in consultation with the Planning Division of the Resource Management Agency.

16.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
Ventura County Area Plans	Ventura County RMA Planning Division	Website
Ventura County General Plan	Ventura County RMA Planning Division	Website
Ventura County General Plan Background Report, Chapter 3	Ventura County RMA Planning Division	PDF | Website
Ventura County Non-Coastal Zoning Ordinance	Ventura County RMA Planning Division	PDF | Website
Ventura County Coastal Zoning Ordinance	Ventura County RMA Planning Division	PDF | Website

17. Population and Housing

17.1 BACKGROUND AND CONTEXT

This issue evaluates project-related and cumulative impacts to housing, including both direct physical impacts to existing housing stock as well as demand for housing, to determine whether the project could result in negative environmental effects associated with unplanned growth.

Chapter 2 of the Ventura County General Plan Background Report provides information on population and *household* trends, labor force patterns, population and employment projections for Ventura County overall, and includes more detailed information about the unincorporated areas. The Housing Element of the Ventura County General Plan ensures that there is adequate land to appropriately accommodate the County's fair share of population growth and housing needs. The purpose of the Housing Element is to identify the County's housing needs; state the County's goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs; and define the policies and programs that the County will implement to achieve the stated goals and objectives. Consistent with the No Net Loss Law (Government Code Section 65863), the County must ensure sufficient residential capacity is maintained to accommodate the County's Regional Housing Needs Allocation (RHNA) for all income categories.

The Ventura County Resource Management Agency Planning Division publishes an annual progress report that provides an overview of the actions taken by the County during the previous calendar year to implement the programs in the General Plan and to meet the County's Regional Housing Needs Allocation (RHNA) objectives for the applicable housing element cycle.

17.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

POP-1 A project may have a significant impact if it would induce substantial unplanned population growth either directly or indirectly.

POP-2 A project may have a significant impact if it would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

17.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 17.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project induce substantial unplanned population growth in an area, either directly or indirectly?

Substantial unplanned population growth is typically considered as the growth exceeding the population projections in the Ventura County General Plan. Consider the following factors to determine whether the project would potentially induce substantial unplanned population growth and result in a level of population beyond the remaining development potential[7] in designated areas and other planning boundaries as described in General Plan Policy LU-1.2 in which the project may be located:

- Anticipated population for the project, including residents and the projected workers in non-residential spaces.
- Anticipated residential population growth for the unincorporated Ventura County area as outlined in the General Plan.
- Potential impacts to population such as, but not limited to:
    - Proposing new homes and businesses.
    - Existing and potential future uses within the vicinity of the project.
    - Extension of utilities, roadways, public services, or other infrastructure into an area that is currently not served or has no existing population.
    - Housing impacts as analyzed in Initial Study Checklist question 22.3(b).

If the project would induce substantial unplanned population growth given the above considerations, then the project would potentially result in a significant impact and mitigation measures should be provided. Further analysis is required and shall be addressed in an environmental impact report (EIR) if there is *substantial evidence* that the project has the potential to induce unplanned population growth in an area directly or indirectly, and no mitigation measures have been identified that would reduce the impact to a less than significant level.

(b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

A project would have a potentially significant impact if it would remove *dwelling units* and does not propose to replace *dwelling units* in kind or in larger amounts, or if the project would displace more residents than it would provide housing for. The *Lead Agency* must first determine the number of existing *dwelling units* that would be eliminated by the project, if any. The project plans shall include an existing conditions sheet which shows the number and location of all *dwelling units*. This sheet shall contain a table that provides an inventory of the *dwelling units* including number of bedrooms and total square footage for living areas in each *dwelling unit* (not including garages), as well as the number of occupants in each *dwelling unit*. If any *dwelling units* would be lost due to the project, the applicant shall demonstrate how these units would be replaced to mitigate the impact on potential displacement of people or housing.

Note that various state laws address housing replacement requirements that may be applicable to the project, which generally include an analysis of whether the units to be demolished or eliminated are occupied by persons of *lower income* or *moderate income* categories. These state laws, as amended, include, for example:

[7] "Remaining development potential" is the amount of development that could occur in a community beyond that which is already developed and accounting for constraints to future development.

- Mello Act (Government Code Section 65590)
- State Density Bonus Law (Government Code Section 65915 et seq.)
- Housing Element Law (Government Code Section 65583.2(g))
- Housing Crisis Act (Government Code Section 66300 et seq.)

Projects subject to state-mandated housing replacement requirements may include, but are not limited to, certain projects that are:

- Located in the coastal zone
- Located on non-vacant sites specifically identified in the Housing Element Site Inventory in the Ventura County General Plan
- Located in an "affected county" area as defined in the Housing Crisis Act
- Seeking a density bonus

Tenant income is typically reviewed as part of the analysis. If income is unknown, some state law provisions provide for a rebuttable presumption that the units are occupied by *lower income households* in the same proportion as renter *households* within the jurisdiction, as determined by the United States Department of Housing and Urban Development's Comprehensive Housing Affordability Strategy database (e.g., Government Code Section 65915(c)(3)(B)). The project should comply with applicable state law(s) when evaluating the number of *dwelling units* that would be lost and the appropriate means by which to replace those units.

Further analysis is required and shall be addressed in an EIR if there is *substantial evidence* that the project would displace substantial numbers of existing people or housing, and no mitigation measures have been identified that would reduce the impact to a less than significant level.

17.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
County of Ventura State-Mandated Annual Progress Report for the General Plan and Housing Element	Ventura County RMA Planning Division	Website
Regional Housing Needs Allocation	California Department of Housing and Community Development	Website

Source	Managing Agency/Organization	Online Access
Ventura County General Plan Background Report, Chapter 2	Ventura County RMA Planning Division	PDF | Website
Ventura County General Plan, Housing Element	Ventura County RMA Planning Division	PDF | Website

18. Recreation

18.1 BACKGROUND AND CONTEXT

Recreation facilities include facilities and services related to providing recreation for the citizens of Ventura County. Recreation facilities managed by the Ventura County Parks Department of the General Services Agency include local parks/facilities, regional parks/facilities, and regional trails/corridors.

18.1.1 Local Parks/Facilities

A local park/facility serves the daily needs of a defined neighborhood or group of neighborhoods within an unincorporated urbanized area of the county. Local park/facility acreage should provide for three primary types of recreation: open areas for passive recreation and relaxation; active sports areas for sports fields and court games; and neighborhood or community centers that accommodate a wide variety of community serving activities catering to all age groups. Local parks/facilities are divided into the following three major classes:

Local Trails/Corridors

Paths that are designed to accommodate non-motorized recreational travel through areas removed from vehicular traffic. Local trails/corridors also serve as access to the regional trail network.

Community Park Facilities and Playfields

Community centers for social and cultural activities, crafts, meetings, special events and senior programs; passive areas for family and group picnics; children play facilities; indoor gyms; health and fitness centers; pools; and other similar recreation features. Playfields are normally part of the community recreation service and consist of specialized facilities that serve organized teams or specific sports enthusiasts including courts, ballfields, and other facilities as may be warranted.

Neighborhood Park Facilities

Open lawn, play apparatus, shade, activity building, and game courts. Joint use with school facilities is common and desirable, and facilities should be provided for the specific needs of the neighborhood within a service radius of one mile.

18.1.2 Regional Parks/Facilities

A regional park/facility is an area of land that by its unique natural character, or unusual or extensive development, offers recreation opportunities from beyond the local vicinity without regard to physical, political, or municipal boundaries. There is no defined service radius. Regional parks/facilities are divided into five major classes:

Regional Park

A regional park should include sufficient developable land to accommodate large, organized groups or family gatherings without sacrificing the basic qualities of the area or the specific attributes that

support specialized use. A regional park may contain a variety of specialized facilities or natural features that will support recreation experiences of county-wide significance.

Preserve

A preserve is an area of land preserved from development to protect unique scenic resources, sensitive or unusual native plants and animals, geologic phenomena, or historical sites or buildings. It may be part of a regional recreation area or a singular entity.

Regional Open Space

A regional open space is an area, the preservation of which in its natural condition would maintain or enhance the aesthetic quality of a regional recreation area, a major portion of the county, or contribute to the logical control of urban development.

Specialized Facility

A specialized facility is a singular area or facility that provides specialized recreation opportunities that are of regional or county-wide significance. It may be an individual element, or it may be a unit of a larger or more inclusive regional park. Specialized facilities may include but are not limited to amphitheaters (bowls), auditoriums, botanical gardens, day use beaches, equestrian centers, fairgrounds, golf courses, museums, nature centers, off-road vehicle areas, campgrounds, group picnic grounds, riding and hiking trails, vista points and zoos.

Recreation Park

A recreation park should provide facilities for a comprehensive recreation program to serve a population of approximately 200,000 by providing facilities such as sports fields, courts, courses, and gyms. It is designed to handle large-scale multiple participant sports programs and can accommodate tournament competition. It may also offer incidental passive recreation areas and local park facilities, such as small picnic areas and playgrounds. It is usually not less than 30 acres in size and may comprise the active recreation element of a regional park.

18.1.3 Regional Trails/Corridors

A regional trail/corridor includes areas and facilities that are intended to accommodate non-motorized recreational travel through areas removed from vehicular traffic. Regional trails/corridors should link major park and recreation facilities. They may be designated as single purpose and/or multi-purpose by design, and major access points should be served by a trailhead.

18.1.4 Other Park Districts and Agencies

The County has partnerships and agreements with the districts and agencies listed below to provide recreational resources. For additional supporting information, refer to Chapter 7 of the Ventura County General Plan Background Report and the Ventura County *Resource Management Agency Geographical Information System Viewer*.

Casitas Municipal Water District

The Casitas Municipal Water District is a local water supplier for western Ventura County, including Ojai, the upper Ojai, Rincon, and parts of Ventura. The district maintains the 300-acre Lake Casitas

Recreation Area and provides for boating, camping, fishing, and recreation services including a water park and disc golf course.

Conejo Open Space Conservation Agency

The Conejo Open Space Conservation Agency (COSCA) was created through a joint agreement between the City of Thousand Oaks and the Conejo Recreation and Park District. COSCA manages 19 open space properties and co-manages 7 open space properties with the Conejo Recreation and Park District, City of Thousand Oaks, County of Ventura, and the Mountains Recreation and Conservation Authority.

Conejo Recreation and Park District

The Conejo Recreation and Park District serves communities within the Conejo Valley both within Thousand Oaks as well as the unincorporated areas of Lynn Ranch, Rolling Hills, and Lake Sherwood. The district maintains 50 developed facilities, which include parks, playfields and special facilities and jointly owns and operates 40 open space areas and regional parks totaling more than 13,000 acres.

Mountains Recreation and Conservation Authority

The Mountains Recreation and Conservation Authority (MRCA) is a local partnership between the Santa Monica Mountains Conservancy, the Conejo Recreation and Park District, and the Rancho Simi Recreation and Park District. MRCA manages about 4,800 acres of open space land in Ventura County.

Pleasant Valley Recreation and Park District

The Pleasant Valley Recreation and Park District includes substantial unincorporated areas south and east of the City of Camarillo. Additionally, some neighborhoods north of Camarillo but within the City's Sphere of Influence, are within the district's boundaries. The district has 27 parks on 300 acres, an aquatic center, a community center, and a skate park.

Rancho Simi Recreation and Park District

The Rancho Simi Recreation and Park District serves residents within Simi Valley but also unincorporated areas in close proximity including Oak Park. The district has 50 parks, over 5,600 acres of open space, two equestrian centers, two swimming pools, and two golf courses.

United Water Conservation District

The United Water Conservation District encompasses the Santa Clara River Valley and the Oxnard Coastal Plain and is a supplier of municipal and agricultural water. The district manages the Lake Piru Recreation Area. Along the western shore of the lake, the district provides boating access, camping, fishing, swimming, and picnicking.

Other Parks and Recreation Departments

The Cities of Santa Paula, Ojai, Oxnard, Moorpark, Ventura, Port Hueneme, and Fillmore each consist of their own Parks and Recreation Department that oversees park and recreation programs and facilities within their respective jurisdictions.

18.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following threshold of significance as specified below.

REC-1 A project may have a significant impact if it would result in substantial physical deterioration due to increased use of existing recreation facilities, or otherwise remove, impede, or obstruct the use of existing recreation facilities or future development of recreation facilities.

18.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the threshold of significance in Section 18.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project result in substantial physical deterioration due to increased use of existing recreation facilities, or otherwise remove, impede, or obstruct the use of existing recreation facilities or future development of recreation facilities?

Determine whether the center of the project site is within two miles of a local or regional park/facility and/or whether the project is *adjacent* to any lands containing regional trails/corridors. If applicable, identify the park and recreation district or agency responsible for maintaining such parks/facilities or trails/corridors. A project may be considered to have a significant impact on recreation facilities if it would result in substantial physical deterioration of existing recreation facilities, or otherwise remove, impede or obstruct access to, or use of, existing or future development of recreation facilities within the vicinity of the project. Future development of recreation facilities are those that have been planned or approved, such as facilities that are identified in an approved land use plan or similar planning document, or that have received a land use entitlement and/or secured public financing. The applicable park and recreation district or agency shall be given the opportunity to review the project and provide recommendations to reduce or mitigate project impacts on recreation facilities.

If the recreation facilities affected are within the jurisdiction of the County of Ventura, the Ventura County General Services Agency shall review the project and provide recommendations to reduce or mitigate project impacts on recreation facilities. Potentially significant impacts involving substantial loss, impediment to, or obstruction of the use of existing or future recreation facilities may require the replacement of that recreation facility in similar size, quality, and character as the affected facility. Replacement recreation facilities should serve the same population as the affected facility. The scope of replacement facilities shall be reviewed and approved by the *Lead Agency* in consultation with the General Services Agency.

For subdivisions subject to the Quimby Act, parkland dedication, the payment of a fee in-lieu thereof, or a combination of both, if applicable, may be imposed on the project pursuant to the Quimby Act to reduce impacts to a less than significant level. The amount of land to be dedicated and/or the fee to be paid shall be determined in accordance with the Quimby Act and applicable Quimby ordinance. Consult with the General Services Agency or the applicable park district to determine whether the project is subject to the Quimby Act and to calculate the appropriate fee, if applicable.

18.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
Casitas Municipal Water District	Casitas Municipal Water District	Website
City of Fillmore, Parks and Recreation Department	City of Fillmore, Parks and Recreation Department	Website
City of Moorpark, Parks, Recreation and Community Services Department	City of Moorpark, Parks, Recreation and Community Services Department	Website
City of Ojai Recreation Department	City of Ojai Recreation Department	Website
City of Oxnard, Parks Division	City of Oxnard, Parks Division	Website
City of Port Hueneme, Recreation and Community Services Department	City of Port Hueneme, Recreation and Community Services Department	Website
City of Santa Paula, Parks and Recreation Department	City of Santa Paula, Parks and Recreation Department	Website
City of Ventura, Parks Division	City of Ventura, Parks Division	Website
Conejo Open Space Conservation Agency	Conejo Open Space Conservation Agency	Website
Conejo Recreation and Park District	Conejo Recreation and Park District	Website
Mountains Recreation and Conservation Authority	Mountains Recreation and Conservation Authority	Website
Pleasant Valley Recreation and Park District	Pleasant Valley Recreation and Park District	Website
Rancho Simi Recreation and Park District	Rancho Simi Recreation and Park District	Website
United Water Conservation District	United Water Conservation District	Website
Ventura County General Plan Background Report, Chapter 7	Ventura County RMA Planning Division	PDF | Website
Ventura County RMA Geographic Information System Viewer	Ventura County Information Technology Services	Website

19. Aviation Hazards

19.1 BACKGROUND AND CONTEXT

There are four airports in Ventura County: The County-owned and operated airports in the cities of Camarillo and Oxnard, a private airstrip in the city of Santa Paula that is open to the public, and the federally operated Navy Base Ventura County (NBVC) Point Mugu Site. The Channel Islands Air National Guard Station has an operation on a 204-acre site *adjacent* to, and utilizes the runways at, the Point Mugu Site. In addition, there are approximately 13 heliports (five associated with hospitals/medical centers), and a few privately owned landing strips located in various parts of the county.

The Ventura County Airport Comprehensive Land Use Plan (ACLUP) seeks to protect the public from the adverse effects of aircraft noise, to ensure that people and facilities are not concentrated in areas susceptible to aircraft accidents, and to ensure that no incompatible structures or activities encroach upon or adversely affect the use navigable airspace. The ACLUP is intended to protect and promote the safety and welfare of residents near the military and public use airports in the county, as well as airport users, while promoting the continued operation of those airports. To achieve those objectives, the ACLUP provides guidance regarding limiting population densities within applicable safety zones and defines noise exposure levels that are in the *Airport Area of Influence (AAOI)* of an airport (see Appendix 19A). The purpose of establishing land use restrictions in safety zones around an airport is to minimize the number of people exposed to aircraft crash hazards and unwanted aircraft generated noise. In Ventura County, the legal authority for ACLUP development and oversight rests with the Ventura County Transportation Commission, acting as the *Airport Land Use Commission*.

In addition, development near military installations such as the NBVC Point Mugu naval base should consider guidance provided in the Joint Land Use Study (JLUS) and the Air Installations Compatible Use Zones (AICUZ) Study. The JLUS is a collaborative effort between the cities of Camarillo, Oxnard, and Port Hueneme, County of Ventura, NBVC, and other stakeholders, that aims to guide planning and land use decisions about development surrounding NBVC and its operational areas at NBVC Point Mugu, NBVC Port Hueneme, and NBVC San Nicolas Island. The AICUZ Study, last updated in 2015, provides prospective aircraft operations, *noise contours*, and accident potential zones, identifies areas of incompatible land use, and recommends actions to encourage compatible land use.

Incompatible land uses near airports include those associated with residential development, retail centers with high density uses, schools, assembly uses, refineries, and mobile home parks.

19.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

AVI-1 A project may have a significant impact if it would result in a potentially incompatible land use within the *AAOI* of an airport, which would expose people residing or working in the

project area to excessive noise levels or substantial safety hazards related to airport operations.

19.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 19.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project result in a potentially incompatible land use within the AAOI of airport, which would expose people residing or working in the project area to excessive noise levels or substantial safety hazards related to airport operations?

Assessment Methodology

Determine whether the project is located within the *AAOI* of one of the airports in Ventura County and the Naval Base Ventura County military airport (see Appendix 19A). Projects within the *AAOI* of any of these airports shall be referred to the applicable airport authorities for review to determine consistency with adopted guidance in the ACLUP. The ACLUP includes noise compatibility standards, identifies safety zones and compatibility standards, and protects airspace through building height restrictions that guide nearby property owners and local jurisdictions in determining what types of land uses are appropriate near these airports. To determine incompatible uses within safety zones or accident potential zones near military installations, refer to the ACLUP, applicable airport land use plan, and JLUS and AICUZ study if applicable. Uses that may be incompatible within more restrictive safety zones in closer proximity to airport runways include, but are not limited to residential uses, churches, theaters, and similar assembly uses, schools, and commercial and industrial buildings with high occupancies. In addition, refer to the following plans and policies:

- Applicable development standards and allowable uses in the County's Non-Coastal Zoning Ordinance and Coastal Zoning Ordinance.
- Noise policies and land use guidance in the General Plan.
- General Plan Policy HAZ-9.2, which states in part: "New *noise sensitive uses* proposed to be located near airports:
    - Shall be prohibited if they are in a *Community Noise Equivalent Level (CNEL)* 65 *decibel (dB)* or greater, *noise contour*; or
    - Shall be permitted in the *CNEL* 60 *dB* to *CNEL* 65 *dB noise contour* area only if means will be taken to ensure interior noise levels of *CNEL* 45 *dB* or less."

General Plan Policy HAZ-9.6 requires that the *Lead Agency* use aircraft noise analysis prepared for local airports or the *noise contours* from the most current AICUZ study, as most appropriate for a project location, as an accurate mapping of the long-term noise impact of the airport's aviation activity. Pursuant to General Plan Policy HAZ-9.6, discretionary residential land uses shall be restricted to areas outside of the 60 *dB CNEL* aircraft *noise contour* unless interior noise levels can be mitigated to meet a maximum 45 *dB CNEL*.

The specific airport referrals to determine if the project would comply with the applicable provisions of the ACLUP for that airport and have any project-specific and/or cumulative impacts on airport operations are:

- Camarillo or Oxnard airports - Ventura County Director of Airports and the Ventura County *Airport Land Use Commission*
- Santa Paula Airport - Santa Paula Airport Manager and the Ventura County *Airport Land Use Commission*
- Naval Base Ventura County Airport - Naval Base Ventura County and the Ventura County *Airport Land Use Commission*

Following review of the project, written comments and observations shall be forwarded to the *Lead Agency*. The comments should provide guidance for determining level of impact and measures to mitigate those impacts, as well as whether a hearing before the Ventura County *Airport Land Use Commission* is necessary.

Preparation of Initial Study Checklist

A determination of **No Impact (N)** shall be made if the project is not located within the *AAOI* of an airport and will not introduce an incompatible land use that would expose people residing or working in the project area to excessive noise levels or substantial hazards related to airport operations.

A determination of **Less Than Significant Impact (LS)** shall be made if the project is located within the *AAOI* of an airport and complies with the land use and development standards, including the restrictions on uses within the airport safety zones, established in the adopted ACLUP, and would not substantially increase the risk of exposing people living or working in these areas to excessive noise levels or hazards associated with airport operations.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made if the project is located within the *AAOI* of an airport and would substantially increase the risk of people living or working in these areas to excessive noise levels or hazards associated with airport operations. However, the project will incorporate impact mitigation measures that will reduce the impacts to a less than significant level.

A determination of **Potentially Significant Impact (PS)** shall be made and further analysis shall be addressed in an environmental impact report (EIR) if there is *substantial evidence* that the project is located within the *AAOI* of an airport and would substantially increase the risk of people living or working in these areas to excessive noise levels or hazards associated with airport operations.

19.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website

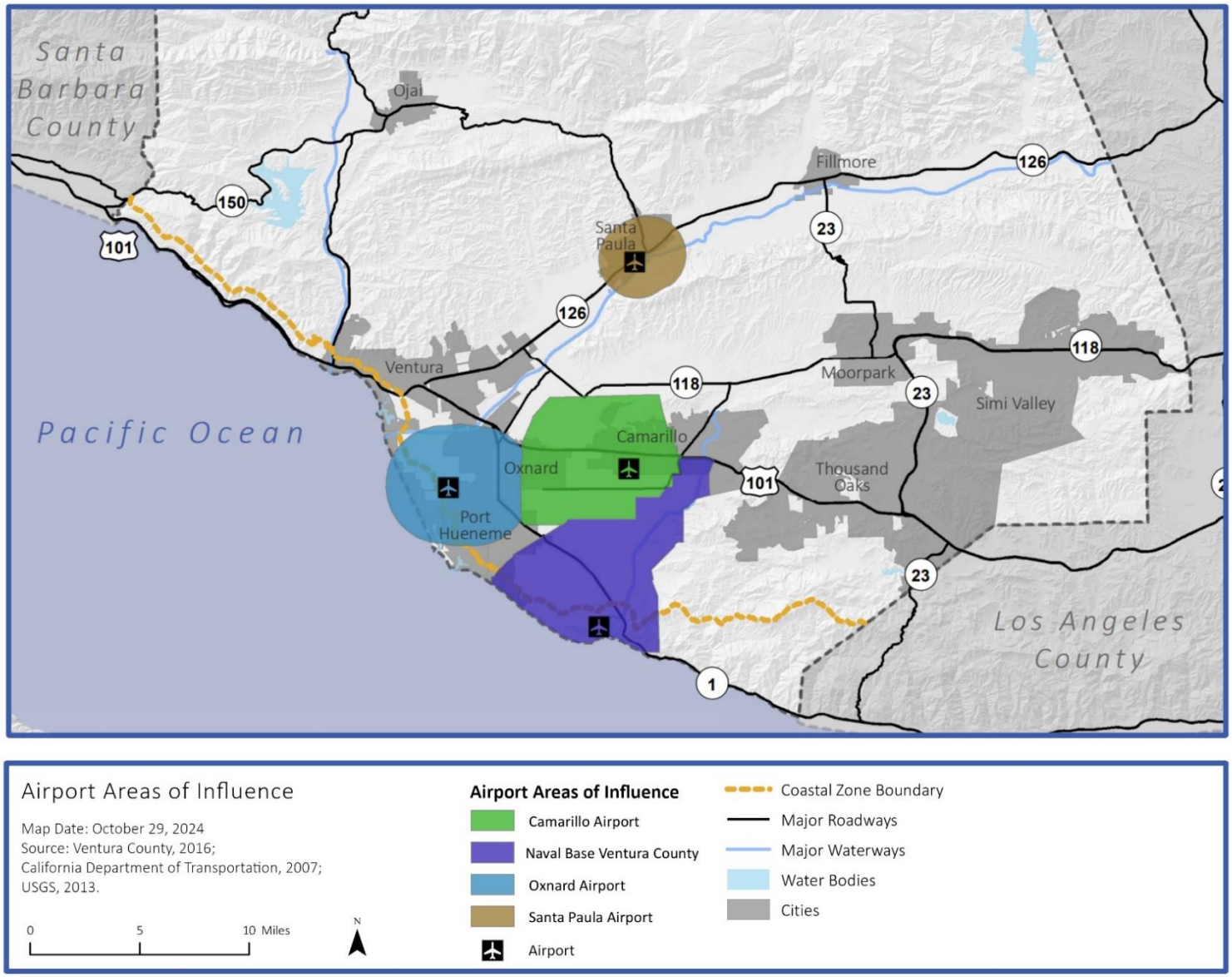
Source	Managing Agency/Organization	Online Access
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
Air Installations Compatible Use Zones Study (AICUZ), December, 2015	Naval Base Ventura County	PDF
Joint Land Use Study (JLUS), September, 2015	Naval Base Ventura County	PDF
Ventura County Airport Comprehensive Land Use Plan (ACLUP), July 7, 2000	Ventura County Airport Land Use Commission	PDF
Ventura County General Plan, Hazards and Safety Element	Ventura County RMA Planning Division	PDF | Website
Ventura County RMA Geographic Information Systems Viewer	Ventura County Information Technology Services	Website

APPENDIX 19A

Airport Areas of Influence

See Figure 19-1 below for a map of the *Airport Areas of Influence (AAOI)*. An interactive map of the *AAOI* can also be found online through the website of the Ventura County *Airport Land Use Commission* or on the Ventura County *Resource Management Agency Geographic Information System Viewer*.

Figure 19-1. Airport Areas of Influence



20. Noise and Vibration

*[**Staff Note:** Updates to the 2010 Construction Noise Threshold Criteria and Control Plan are included as part of the comprehensive update of the Initial Study Assessment Guidelines. The Construction Noise Threshold Criteria and Control Plan has been renamed to the Ventura County Noise and Vibration Assessment Guidelines, which is available for public review.]*

20.1 BACKGROUND AND CONTEXT

20.1.1 Noise

Noise is defined as any unwanted sound that is undesirable because it interferes with speech and hearing, is intense enough to damage hearing, or is otherwise disruptive. Noise impacts can occur during the construction and/or operational phases of a project.

Except for a few large-scale construction projects that last a period of years, most projects involve only short-term construction noise impacts. The severity of construction noise impacts varies based on the location of *noise sensitive uses*; type or phase of construction; combination of equipment used; site layout; and construction methods that are employed.

Operational noise typically includes long-term impacts—that is, impacts that persist throughout the life of a project. Impacts from operational noise vary based on the location of *noise sensitive uses*; type of equipment or machinery routinely used; site layout; and duration and times during which noise-generating uses occur.

20.1.2 Vibration

Vibration is the periodic oscillation of a medium or object with respect to a given reference point. Sources of vibration include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) and those introduced by human activity (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous (e.g., operating factory machinery) or transient in nature (e.g., explosions). The most common type of environmental impact involving vibration consists of ground vibration, which is the periodic displacement of earth, which creates vibration waves that move through soil and rock strata, foundations of nearby buildings, and then throughout parts of the building structure. Ground-borne vibration can result in sensible movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. The rumbling sound caused by the vibration of room surfaces is called ground-borne noise.

Typical outdoor sources of perceptible ground vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground vibration is rarely perceptible. The operation of construction equipment and construction techniques (e.g., pile driving, blasting, or excavation) can generate temporary ground vibration impacts. Moreover, heavy duty vehicles traveling along roadways with potholes and bumps, steel-wheeled/steel-rail vehicles (e.g., trains), and equipment used in industrial operations which are related to a project can generate recurring ground vibration impacts throughout the life of a project.

Construction activities can generate sufficient ground vibrations to pose a risk to nearby structures and generate ground-borne noise that is discomforting or a nuisance to individuals who live or work close to vibration-generating activities. Constant or transient vibrations can weaken structures, crack facades, and disturb occupants. Vibrations generated by construction activity can be transient, random, or continuous. Transient construction vibrations are generated by blasting and wrecking balls. Continuous vibrations are generated by vibratory pile drivers, large pumps, and compressors. Random vibration can result from jackhammers, pavement breakers, and heavy construction equipment.

Section 11.6 of the Ventura County General Plan Background Report includes additional technical information on noise and information on existing noise levels throughout Ventura County. Additionally, refer to the Ventura County Noise and Vibration Assessment Guidelines for technical information and guidance on evaluating noise and vibration impacts.

20.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

NOI-1 A project may have a significant impact if it would generate an increase in *ambient noise levels* in excess of the noise standards established in the Ventura County Noise and Vibration Assessment Guidelines, General Plan, *Area Plan*, and Zoning Ordinance applicable to the project.

NOI-2 A project may have a significant impact if it would generate construction or other vibration in excess of vibration standards established in the Ventura County Noise and Vibration Assessment Guidelines and Section 6.2 (Determine Vibration Impact Criteria) of the Federal Transit Administration's Transit Noise and Vibration Assessment Manual ("FTA Manual").

20.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 20.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project generate an increase in ambient noise levels in excess of the noise standards established in the Ventura County Noise and Vibration Assessment Guidelines, General Plan, and Area Plan and Zoning Ordinance applicable to the project?

Construction-Related Noise Impacts

Construction noise impacts shall be evaluated using the assessment methodology, criteria, mitigation, and reporting procedures provided in the Ventura County Noise and Vibration Assessment Guidelines. All other types of noise impacts shall be evaluated pursuant to the following procedures.

Operational-Related Noise Impacts

Preliminary Assessment

A preliminary assessment shall be conducted by the *Lead Agency*, in coordination with a qualified consultant retained by the applicant, to determine whether an acoustical analysis will be required. The preliminary assessment shall consist of the following:

- Determine the estimated operational noise levels of the noise-generating equipment and activities and the times at which the noise levels would occur.
- Determine the proximity of the noise-generating equipment and activities to the *noise sensitive uses* based on the project plans, information gathered during a site visit, aerial imagery, and land use maps that are available from *County View* and the Ventura County *Resource Management Agency Geographic Information System (RMA GIS) Viewer*.

In general, noise decreases by 5 *dB* for each doubling of the distance from the noise source. If the noise generated from the project is estimated to exceed any of the following standards at the nearest *noise sensitive use*, the noise impact is considered to be potentially significant and an acoustical analysis must be completed:

- Leq1H of 55 *dB(A)*[8] or *ambient noise level* plus three *dB(A)*, whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.;
- Leq1H of 50 *dB(A)* or *ambient noise level* plus three *dB(A)*, whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.;
- Leq1H of 45 *dB(A)* or *ambient noise level* plus three *dB(A)*, whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m.;
- The project would result in traffic noise levels above a noise compatibility standard stated in General Plan Policy HAZ-9.2 in an area where traffic noise levels, under existing conditions, do not exceed the County noise compatibility standard; or
- The project would result in an increase in traffic noise levels of three *dBA* or greater in an area where traffic noise levels under existing conditions exceed a County noise compatibility standard stated in General Plan Policy-HAZ 9.2.

Acoustical Analysis

If the preliminary assessment determines that an acoustical analysis is required, the project applicant shall be responsible for conducting the acoustical analysis using a qualified consultant (Appendix 20A). The *Lead Agency* shall ensure that the consultant meets the minimum qualifications. In a continuing effort to update County noise data, a copy of the acoustical analysis shall be sent to the RMA Planning Division.

The purpose of the acoustical analysis is to determine whether the project would result in potentially significant noise impacts; identify any *feasible* mitigation measures that would reduce the severity

[8] A-weighted sound level (dBA or dB(A)) is defined in the General Plan, as may be amended, which states: the sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network specified in the American National Standards Institute Specification for Sound Level Meters, ANSI S 1.4–1983. The A-weighting filter de-emphasizes the very low- and very high-frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.

of the noise impacts; and determine whether the noise impacts, after mitigation, would still be potentially significant. As such, the acoustical analysis must include:

- Discussion of the existing environmental setting (e.g., a description of the noise sources and *ambient noise levels* of the project site and surrounding area);
- Discussion of past, present, and reasonably foreseeable probable future projects that have the potential to contribute to cumulative impacts to the noise environment and, as such, are included in the acoustical analysis;
- Discussion of the methodology used in collecting noise data (e.g., noise equipment and metrics used). Noise measurements should be taken using standard industry practices, after taking into consideration site-specific characteristics (e.g., buildings, walls, topography, and the location of existing and potential future *noise sensitive uses* in relation to noise generators) that may have an influence on the noise measurements;
- Discussion of the methodology used in calculating project-specific and cumulative noise impacts (e.g., noise models used);
- Presentation of the data on the existing noise environment, as well as data on projected noise levels; and
- Initial Study checklist and discussion pursuant to the requirements of the Ventura County Initial Study Assessment Guidelines.

Preparation of Initial Study Checklist

A determination of **Less Than Significant Impact (LS)** shall be made if the project would not generate construction or operational noise in excess of the noise standards established in the Ventura County Noise and Vibration Assessment Guidelines, General Plan, and *Area Plan* and Zoning Ordinance applicable to the project.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made if the acoustical analysis shows that the project would result in significant noise impacts, but *feasible* mitigation measures could be incorporated into the project to reduce the impact to a less than significant level.

A determination of **Potentially Significant (PS)** shall be made and further analysis shall be addressed in an environmental impact report (EIR) if there is *substantial evidence* that the project would result in significant noise impacts.

(b) Would the project generate construction or other vibration in excess of vibration standards established in the Ventura County Noise and Vibration Assessment Guidelines and Section 6.2 (Determine Vibration Impact Criteria) of the FTA Manual?

The *Lead Agency* shall consider past, present, and reasonably foreseeable probable future projects within the vicinity of the project site that have the potential to contribute to cumulative impacts relating to vibration.

Construction Vibration Impact Analysis

The *Lead Agency* shall request from the project applicant information regarding the types of construction activities that would be required; duration of each construction phase; and types and number of construction equipment that would be used during each phase of construction.

Construction vibration impacts shall be evaluated using the assessment methodology and construction vibration thresholds of significance identified in the Ventura County Noise and Vibration Assessment Guidelines. Additional guidance for conducting the assessment and reporting findings can be found in the FTA Manual. Projects that would generate new heavy vehicle (e.g., semi-truck or bus) trips on uneven roadways located in proximity to a *vibration sensitive use category* shall be evaluated using the methodology prescribed for rubber-tire heavy vehicle *transit uses* in the Ventura County Noise and Vibration Assessment Guidelines. Additional guidance for conducting the assessment and reporting findings can be found in the FTA Manual. The assessment must include responses to the Initial Study Checklist.

Other Vibration-Related Impacts

The *Lead Agency* shall determine whether the project is located within the vicinity of a *vibration sensitive use category*. If the project is located within the vicinity of a *vibration sensitive use category* and would result in a significant vibration impact, the project applicant shall be responsible for conducting a General Vibration Assessment or Detailed Vibration Analysis consistent with the assessment procedures outlined in Section 6.2 of the FTA Manual, as appropriate, using a qualified consultant (see Appendix 20A). Ground-borne vibration impacts shall be evaluated according to the assessment methodology and threshold criteria contained in the Ventura County Noise and Vibration Assessment Guidelines.

Preparation of Initial Study Checklist

A determination of **Less Than Significant Impact (LS)** shall be made if the vibration impact analysis, General Vibration Assessment, or Detailed Vibration Analysis shows that the project would not result in a significant vibration impact.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made if the analysis shows that the project would result in significant vibration impacts, but *feasible* mitigation measures will be incorporated into the project to reduce the impact to a less than significant level.

A determination of **Potentially Significant (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would result in significant vibration impacts.

20.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		

Source	Managing Agency/Organization	Online Access
County View	Ventura County Geographic Information Systems	Website
Transportation and Construction Vibration Guidance Manual	California Department of Transportation (Caltrans)	PDF | Website
Transit Noise and Vibration Impact Assessment Manual	Federal Transit Administration (FTA)	PDF | Website
Highway Construction Noise Handbook	Federal Highway Administration (FHWA)	Website
Ventura County General Plan Background Report, Chapter 11	Ventura County RMA Planning Division	PDF | Website
Ventura County General Plan, Hazards and Safety Element	Ventura County RMA Planning Division	PDF | Website
Ventura County Noise and Vibration Assessment Guidelines	Ventura County RMA Planning Division	PDF | Website
Ventura County RMA Geographic Information Systems Viewer	Ventura County Information Technology Services	Website

APPENDIX 20A

Noise Consultant Qualifications

Noise consultants must demonstrate that they meet the minimum qualifications as defined below:

Education

Consultants should hold an advanced degree from an accredited institution (e.g., M.A., M.S., or Ph.D.) in Physics, Mathematics, Engineering or related discipline. Consultants without an advanced degree in these fields must provide documentation of at least five years of relevant research or field work in acoustical engineering.

Experience

All consultants must possess a working knowledge of physics, acoustical principles, utilization of sound level meters, and applicable state codes. Experience with CEQA is highly desirable. Consultants also must have experience in the following:

- Acquiring and evaluating data;
- Creating mitigation monitoring and reporting programs; and,
- Evaluating designs for compliance with standards relative to land use.

Local and State Expertise

Consultants must provide evidence of expertise in community/industrial noise (e.g., the preparation of Noise Elements of General Plans, technical reports, studies, mitigation measures, or noise ordinances).

Professional Certification

Evidence of professional certification is highly desirable though not required.

Vibration Consultant Qualifications

Vibration consultants must demonstrate that they meet the minimum qualifications as defined below:

Education

Consultants should hold an advanced degree from an accredited institution (e.g., M.A., M.S., or Ph.D.) in Physics, Mathematics, Engineering or related discipline. Consultants without an advanced degree in these fields must provide documentation of at least five years of relevant research or field work in engineering activities involving vibration impact assessment.

Experience

All consultants must possess a working knowledge of physics, vibration principles, and applicable state codes. Experience with CEQA is highly desirable. Consultants also must have at least five years experience in the following:

- Acquiring and evaluating data;

- Creating mitigation monitoring and reporting programs; and,
- Evaluating designs for compliance with standards relative to land use.

Local and State Expertise

Consultants must provide evidence of expertise in transportation, construction, and/or industrial vibration (e.g., the preparation of environmental assessments, technical reports, studies, or mitigation measures).

Professional Certification

Evidence of professional certification is highly desirable though not required.

21. Geological Hazards

21.1 BACKGROUND AND CONTEXT

21.1.1 Fault Rupture

A fault is a shear or zone of closely associated shears across which earth materials on one side have been displaced with respect to those on the other side because of tectonic forces. A fault is distinguished from those fractures or shears caused by landsliding or other gravity-driven surficial failures. Fault rupture hazards primarily exist along pre-existing faults. These faults are considered to pose a hazard if they have moved within a specific recent period of time. This period depends upon the type of project. For almost all projects, the period of interest is the past 11,000 to 12,000 years. For the siting of critically hazardous facilities, such as atomic power plants, fault activity over longer periods of time needs to be considered. Section 11.1 of the Ventura County General Plan Background Report ("Background Report") provides additional information on major faults located in Ventura County, which are also mapped in Figure 11-1 in Section 11.1 of the Background Report and *County View* and the Ventura County *Resource Management Agency Geographic Information System (RMA GIS) Viewer*.

21.1.2 Ground Shaking

Ground shaking hazards are ubiquitous throughout Ventura County and are addressed in the Ventura County Building Code. Ground shaking hazard areas are areas expected to experience intense ground shaking during a maximum probable earthquake.

The potential for the highest amplification of ground shaking occurs in the Oxnard Plain and the Santa Clara River Valley in the south half of the County, and in the Lockwood, Cuyama, and Cuddy Valleys in the north half. Additional information on ground shaking hazards specific to Ventura County is provided in Section 11.1 of the Background Report.

21.1.3 Liquefaction

Liquefaction can result in settling of roadways, rupture of underground pipelines and cables, and shifting of building foundations. As foundations lose support, buildings and other objects on the ground surface can settle, tilt, and collapse. Lightweight buried structures can float to the surface. Four types of failure commonly result from liquefaction:

- **Lateral spreading:** Lateral movement in a fractured mass of rock or soil, which result from liquefaction or flow of subjacent materials. Commonly developed *adjacent* to channels and riverbanks on slopes between 0.3 and 3 degrees. Movements are commonly several feet, although displacements up to several tens of feet are possible.
- **Flow failure:** Occurs where liquefied soil is present on an original slope usually greater than 3 degrees. Liquefied soil and blocks of solid ground are often displaced many tens of feet at speeds up to several tens of miles per hour and can produce catastrophic effects. Almost all human-made structures are susceptible to damage by flow slides.

- **Ground oscillation:** Occurs when the liquefied layer is present at depth and the slope is too gentle for flow failure or lateral spreading. Ground cracks may open and close, settlement can occur, and sand boils may be present. Overlying structures and particularly sub-grade facilities are commonly damaged through this mode of ground failure.
- **Loss of bearing:** Liquefied soil with little internal shear resistance and ability to support load without deformation. Bearing failures can result in general settlements, tipping or toppling of buildings and the buoyant rise of empty buried tanks.

The liquefaction hazard generally exists throughout the Oxnard Plain and Pleasant Valley. The hazard areas extend up the Ventura and Santa Clara Rivers, mainly in the areas underlain by extensive alluvial deposits. Some of the valleys in the Thousand Oaks area are also affected, as is the Arroyo Santa Rosa downstream of the City of Thousand Oaks-Hill Canyon Wastewater Treatment Plant. Simi Valley is affected at both the east and west ends. Both the upper and lower Ojai Valleys are in the hazard areas as well as San Antonio Creek from Ojai to the Ventura River. The low-lying areas north of Lake Casitas are also subject to liquefaction.

Additional information on liquefaction hazards in Ventura County is provided in Section 11.1 (Figure 11-1 and 11-2) of the Background Report.

21.1.4 Landslide/Debris Flow Hazard

Landslide and debris flow are terms to designate certain forms of natural or human-induced slope failures. The term "landslide" means the dislodging and fall of a mass of soil or rocks along a sloped surface, or the dislodged mass itself. A debris flow is a flow of very wet rock and soil. Included within the definition of this hazard, for the purposes of conducting environmental assessments, are all gravity-induced downslope movements, including the separate phenomena of rockfall, soil creep, soil failures, dry raveling, rotational and transitional slides, flows, slumps and complex combinations of the above phenomena. The hazard applies to both natural and constructed slopes. Contributing factors include erosion, earthquake ground shaking, brush fires, and groundwater.

There are presently two landslide hazards that are distinguished and are required to be assessed for the preparation of the Initial Study Checklist. The first landslide hazard is from mapped or known landslides. The sources of mapped landslides include but are not limited to the Public Works Agency (PWA) files, Dibblee Quadrangle Maps, and the California Geologic Survey (California Division of Mines and Geology) Landslide Evaluation maps. The second landslide hazard is from potential earthquake induced landslide areas as shown on the State of California Seismic Hazard Maps.

Landslide/debris flow hazards potentially exist on all hillside and *adjacent* downslope areas in Ventura County. Additional information on landslide hazards in Ventura County is provided in Section 11.1 of the Background Report.

21.1.5 Subsidence

Subsidence is any settling or sinking of the ground surface over a regional area arising from surface or subsurface causes, such as earthquakes or groundwater and/or oil/gas extraction. Subsidence occurs as a gradual change over a considerable distance (miles), or less commonly, it can occur in discrete zones. Subsidence is in contrast to settlement, a term used to describe site-specific consolidation of strata from an imposed load such as a landfill or from some other man-caused increase in the effective stress conditions of subsurface earth materials.

Subsidence that results from groundwater withdrawal can be responsible for numerous structural effects. Drainage courses, roads, rail lines, wells, oil/gas pipelines, and utility (water, gas, power, and sewer) lines are potentially the most vulnerable to damage. The process by which this most important type of subsidence occurs involves the extraction of a large quantity of water from an unconsolidated aquifer.

Subsidence is any settling or sinking of the ground surface over a regional area arising from surface or subsurface causes, such as earthquakes or groundwater, or oil and gas extraction. Subsidence caused by groundwater withdrawal generally occurs in valley areas underlain by alluvium. Groundwater extraction has contributed to subsidence in the Oxnard Plain, the Las Posas Valley, and the Santa Clara River Valley.

21.1.6 Expansive Soils

Expansive soils are primarily clay-rich soils subject to changes in volume with changes in moisture content. The resultant shrinking and swelling of soils can influence all fixed structures, utilities and roadways. Included within the definition of expansive soils are certain bedrock formations with expansive rock layers or zones and weathered horizons. In addition, as expansive soil on sloping ground expands and contracts, it tends to move down slope in response to gravity.

Expansive soils are present throughout most areas of Ventura County, including both low-lying and hillside terrain. They are present in some areas in thick accumulations and in others as a thin cover. Beaches, sea cliffs, bare rock and active stream channels are usually free of expansive soil accumulations. Additional information on expansive soils in Ventura County is provided in Section 11.1 of the Background Report.

21.1.7 Seiche and Tsunami Hazards

A seiche is a standing wave oscillating in a body of water. Seiches typically occur in lakes and bays, and are normally caused by unusual tides, winds or currents, but can also be produced by earthquake ground motion. The primary hazards resulting from a seiche are to structures and boats in or very near a lake, harbor or bay. Only in the case of a severe seiche or unusual circumstances would loss of life be likely from the seiche itself. Large seiches can overtop the dams of man-made lakes or reservoirs, causing flood in the areas downstream. This overtopping can also wash out unprotected earth-fill dams, causing their complete collapse.

Areas subject to seiche hazards are typically those located within 20 feet of vertical elevation from a smaller enclosed body of water such as a bay, 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 bay, lake or reservoir.

There is no record of a seiche that resulted in damage in Ventura County. As such, the actual threat that is posed by seiches in Ventura County is small, in that it is probably the most remote of the hazards studied, although it may not be the least severe.

Tsunamis are giant waves caused by earthquakes or volcanic eruptions under the sea. They can cause loss of life from drowning and extensive damage to structures on or near beaches and river mouths. There can also be an increased occurrence of fire from broken oil or gas tanks or lines, as well as flooding from blocked rivers. The tsunami hazard is mainly confined to the immediate beach areas and river mouths.

As shown in Table 11-3 in Section 11.2 of the Background Report, there have been eight notable tsunami event run-ups recorded in Ventura County.

21.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below. State CEQA Guidelines Section 15126.2(a) provides guidance for when and how the effects of locating projects in hazardous or vulnerable locations should be analyzed under CEQA. A *Lead Agency* is not required to perform "reverse CEQA analysis" by analyzing the impacts of the existing environment on the project and its future users unless the project has a reasonably foreseeable risk of causing or exacerbating existing environmental hazards by bringing development or people into the area affected. Within this analytical framework, State CEQA Guidelines Section 15126.2(a) states that "the EIR should evaluate any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions . . . including both short-term and long-term conditions, as identified in authoritative hazard maps, risk assessments or in land use plans addressing such hazards areas." The thresholds of significance in this section should be interpreted and applied in accordance with this guidance.

GEO-1 A project may have a significant impact if it would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, strong seismic ground shaking, or seismic-related ground failure.

GEO-2 A project may have a significant impact if it would be located on a geologic unit or soil that is unstable or cause the geologic unit or soil to become unstable as a result of the project, and directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving on- or off-site liquefaction, *lateral spreading*, landslide/debris flow, subsidence, or collapse.

GEO-3 The project may have a significant impact if it would cause potential substantial adverse effects, including the risk of loss, injury, or death involving soil expansion if the project is located within a soils expansive hazard zone or where soils with an expansion index greater than 130 are present.

GEO-4 The project may have a significant impact if it would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving seiche hazard if the project is located within 20 feet of vertical elevation from an enclosed body of water, such as a lake or reservoir or within a tsunami inundation hazard zone.

21.3 IMPACT ANALYSIS

Projects that involve new construction or grading within a hillside or area containing a geologic hazard as described in Section 11.1 of the Background Report shall retain a geotechnical engineer and/or qualified engineering geologist to prepare a geotechnical and/or geologic report. The project's qualified geotechnical engineer and/or qualified engineering geologist must apply all applicable regulatory requirements to the seismic design of the project. For projects that are not regulated by the Ventura County Building Code, the project should incorporate customary

industry practices and materials, or the geotechnical and/or geologic report must address and provide design recommendations to reduce seismic hazards.

Proposed structures, including nonstructural components that are permanently attached to structures and their supports and attachments, must be reviewed and evaluated in light of the requirements of the Ventura County Building Code and the geotechnical and/or geologic report regarding seismic effects like earthquake ground shaking. The evaluation must use minimum design criteria for structures appropriate to their primary function and use, taking into consideration the need to protect the health, safety, and welfare of the general public by minimizing seismic-related risk to life, and to improve the capability of essential (or critical) facilities to function during and after seismic events.

The report by the qualified geotechnical engineer and/or engineering geologist must be submitted to the PWA for review and use in completing the Initial Study Checklist.

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 21.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, strong seismic ground shaking, seismic-related ground failure?

Earthquake Fault Zones

Earthquake Fault Zones, which are also known as Alquist-Priolo Earthquake Fault Zones, are regulatory zones that encompass traces of Holocene-active faults[9] to address hazards associated with surface fault rupture. Earthquake Fault Zones are delineated by the State Geologist and implemented by public agencies through permitting, inspection, and land use planning activities.

The project applicant, working with consultants retained by the applicant, shall determine whether the project is within or near an Earthquake Fault Zone. For projects that are not within or near a designated Earthquake Fault Zone, a determination of **No Impact (N)** shall be made.

If the project lies within or near a designated Earthquake Fault Zone, the project applicant shall obtain a geologic fault investigation report addressing the Holocene-active fault rupture hazard and potential surface deformation. If the fault investigation report is required by appropriate law or ordinance, or in accordance with standard practices, such report must address the potential fault rupture hazard. Significance determinations shall be based on the following conclusions of such reports.

- If the proposed habitable structures are free of potential hazards from surface fault rupture and surface deformation, a determination of **Less than Significant Impact (LS)** shall be used to complete this item in the Initial Study Checklist.

[9] "Holocene" is an epoch of the Quaternary period, from the end of the Pleistocene, approximately 11,700 years ago, to the present time. A Holocene-active fault is a fault that has had surface displacement within Holocene time (i.e., the last 11,700 years).

- If the proposed habitable structures at the project site are subject to hazard from surface fault rupture and/or surface deformation, but that the amount of rupture or surface distortion may be mitigated by various methods including structural design or relocation within the project site, a determination of **Less Than Significant with Mitigation Incorporated (LS-M)** shall be used to complete this item in the Initial Study Checklist.
- If there is *substantial evidence* that the proposed habitable structures at the project site are subject to hazards from surface fault rupture and surface deformation, a determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an EIR.

The project applicant shall submit the geologic fault investigation report to the PWA which shall review for adequacy and use it for the completion of the appropriate sections of the Initial Study Checklist. The fault investigation report must be prepared by a Professional Geologist following the outline of the appropriate California Geological Survey (formerly California Division of Mines and Geology) Special Publication 42 or as agreed by the PWA.

Cumulative Impacts

There is no cumulative impact from fault rupture hazards that would occur as a result of past, present, and reasonably foreseeable probable future projects.

(b) Would the project be located on a geologic unit or soil that is unstable or cause the geologic unit or soil to become unstable as a result of the project, and directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving on- or off-site liquefaction, lateral spreading, landslide/debris flow, subsidence, or collapse?

Liquefaction

The State of California has produced the Seismic Hazard Zone Maps, including potential for liquefaction, based on the Quaternary Geology of Ventura County, water well records for material type and density, and highest groundwater elevations. Figures 11-1 and 11-2 in Section 11.1 of the Background Report and *County View* and the Ventura County *Resource Management Agency Geographic Information System (RMA GIS) Viewer* show fault and liquefaction zones in Ventura County based on the maps from the State of California.

A determination of whether the project is in a zone of required investigation for liquefaction shall be performed by the project applicant's technical consultants.

Projects located in mapped zones of required investigation for liquefaction must be evaluated for liquefaction potential defined in Public Resources Code Section 2693(c). The liquefaction evaluation shall be completed and summarized in a report subject to review and acceptance by the PWA.

The liquefaction evaluation must be conducted in accordance with the requirements of the Guidelines for Evaluating and Mitigating Seismic Hazards in California, Special Publication 117A, latest edition, prepared by the California Geological Survey. Liquefaction evaluations should also discuss the type(s) of liquefaction failure and the most likely to occur, such as *lateral spreading*.

Landslide

Evaluation and mitigation of landslide/debris flow hazard is subject to the provisions of the Ventura County Building Code administered by PWA and Resource Management Agency, Building and Safety Division. Site-specific, detailed geologic investigations are required as a part of all development

projects in the hillside areas of Ventura County for the purpose of determining development feasibility with respect to geologic hazards. If a site-specific geology report prepared by the applicant has analyzed this concern, the report shall be reviewed to determine the significance of any potential landslide/debris flow impacts resulting from the project. Additional means of evaluating this hazard include site reconnaissance, review of aerial photographs and review of published geologic literature and unpublished consultant studies.

The PWA, based on review of the various available maps, publications and/or field information, shall determine the general potential for landslides/debris flow.

Subsidence

The project applicant shall determine if the project is within a subsidence hazard zone. The project applicant, in consultation with the *Lead Agency*, shall complete a preliminary subsidence assessment to determine whether a full subsidence evaluation is required. Projects that are within the limits of a probable subsidence zone and involve extraction of groundwater, oil, or gas, or are sensitive to slight changes in surface gradients, will be required to have a geologic/geotechnical report evaluate the potential subsidence hazards resulting from the project. Subsidence evaluation reports shall be reviewed by PWA based on the latest available maps, publications and field data.

Preparation of the Initial Study Checklist

A determination of **No Impact (N)** shall be made if the project:

- Is not within a zone of required investigation for liquefaction.
- Is not within a hillside area and not affected by potential landslide or debris flow.
- Is not within a known subsidence hazard zone or do not relate to oil, gas, or groundwater withdrawal.

A determination of **Less Than Significant Impact (LS)** shall be made if the project:

- Indicates liquefaction hazards do not exist, or the effects of liquefaction do not require any mitigation.
- Indicates sufficient project slope stability factors of safety have been obtained.
- Indicates that it is not sensitive to slight changes in gradient or slope resulting from subsidence and the project does not extract oil, gas or water from the earth.

A determination of **Less Than Significant with Mitigation Incorporated (LS-M)** shall be made if:

- Liquefaction hazards are present and recommendations acceptable to the PWA are provided to mitigate the potential liquefaction hazards.
- The project is within a mapped landslide or earthquake induced landslide zone or immediate to these areas and recommendations are provided to mitigate the potential hazards.
- The project is within the limits of the probable subsidence zone that are sensitive to slight changes in gradient or slope and/or will extract oil, gas or water from the earth, and recommendations are provided to mitigate the potential hazards to less than significant levels.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would directly or indirectly cause

potential substantial adverse effects, including the risk of loss, injury, or death involving on- or off-site liquefaction, *lateral spreading*, landslide/debris flow, subsidence, or collapse.

(c) Would the project cause potential substantial adverse effects, including the risk of loss, injury, or death involving soil expansion if the project is located within a soils expansive hazard zone or where soils with an expansion index greater than 130 are present?

For geotechnical reports that evaluate the soil expansion of the project area, the expansion index shall be determined by the latest edition of American Society for Testing and Materials (ASTM) D4829 and in the event that soil expansion varies with depth, the weighted index shall be determined in accordance with the method prescribed in the Ventura County Building Code.

For projects that contain near surface soils with an expansion index less than 20, a determination of **No Impact (N)** shall be used to complete this item in the Initial Study Checklist.

If the project lies in an area of expansive soils that have an expansion index that is:

- Between 20 and 130, and a geotechnical report provides design recommendations for expansive soils, a determination of **Less than Significant Impact (LS)** shall be used to complete this item in the Checklist.
- Greater than 130 and a geotechnical report has been prepared that provides mitigation recommendations for the expansive soils, a determination of **Less Than Significant with Mitigation Incorporated (LS-M)** shall be used to complete this item in the Checklist.
- Greater than 130 and there is *substantial evidence* that the project could result in potentially substantial adverse effects, including the risk of loss, injury, or death involving soil expansion, a determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an EIR.

(d) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving seiche hazard if the project is located within 20 feet of vertical elevation from an enclosed body of water, such as a lake or reservoir or within a tsunami inundation hazard zone?

A preliminary assessment should be completed by the project applicant's technical consultant to determine whether the project is located within 20 feet of elevation from an enclosed body of water or within a tsunami inundation hazard zone.

For projects located near known tsunamis or seiche hazard areas, the geologist and geotechnical engineer should evaluate potential seiche and/or tsunami effects during the preliminary design of structures. The evaluation should consider the inundation effects and hazards of seiche and tsunamis, such as, but not limited to, whether the project would exacerbate risks of exposure to leaks or spills of hazardous materials, hazardous waste, or other pollutants into the environment. The evaluation report shall be reviewed by the PWA for adequacy and in determining the significance of the hazard.

If the project is not located within an area subject to seiche or tsunami hazards, a determination of **No Impact (N)** shall be used to complete this item in the Initial Study Checklist.

A determination of **Less Than Significant Impact (LS)** shall be made if the project is located within an area subject to tsunami or seiche hazards, and the project design complies with regulatory standards and requirements which would avoid or minimize adverse environmental effects.

A determination of **Less Than Significant with Mitigation Incorporated (LS-M)** shall be made if the project is located within 20 feet of elevation from an enclosed body of water or an area subject to tsunami or seiche hazards, and would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death. However, mitigation measures have been identified and will be implemented as part of the project to reduce adverse effects to a less-than-significant level.

A determination of **Potentially Significant Impact (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project is located within 20 feet of elevation from an enclosed body of water or an area subject to tsunami or seiche hazards, and there is *substantial evidence* that the project could result in potentially substantial adverse effects, including the risk of loss, injury, or death involving a tsunami or seiche.

21.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
California Earthquake Hazards Zone Online Map Application	California Department of Conservation, California Geological Survey	Website
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
California Geological Survey Information Warehouse (contains hazard maps)	California Department of Conservation, California Geological Survey	Website
California Regional Geologic Maps	California Department of Conservation, California Geological Survey	Website
California Seismic Hazard Zones	California Department of Conservation, California Geological Survey	Website
County View	Ventura County Geographic Information Systems	Website
Guidelines for Evaluating and Mitigating Seismic Hazards in California, Special Publication 117A	California Department of Conservation, California Geological Survey	Website
Standard Test Method for Expansion Index of Soils D4829	American Society for Testing and Materials (ASTM)	Website
Ventura County Building Code	Ventura County RMA Building and Safety Division	Website

Source	Managing Agency/Organization	Online Access
Ventura County General Plan Background Report, Chapter 11	Ventura County RMA Planning Division	PDF | Website
Ventura County RMA Geographic Information Systems Viewer	Ventura County Information Technology Services	Website
Ventura County Tsunami Hazard Areas	California Department of Conservation, California Geological Survey	Website

22. Wildfire Hazards

22.1 BACKGROUND AND CONTEXT

This section focuses on the rural or wildland areas of Ventura County and wildfire impacts that could potentially result from a proposed project located in or *adjacent* to County designated *Hazardous Fire Areas (HFAs)* identified pursuant to the Ventura County Fire Code, as well as *Fire Hazard Severity Zones (FHSZ)* in State Responsibility Areas (SRAs) as defined in Public Resources Code (PRC) Section 4102, and Local Responsibility Areas (LRAs), which are areas where a local governmental agency is primarily responsible for preventing and suppressing wildfires.

HFAs include areas where brush can be found growing in a natural state, which is most common on undeveloped land and hillside areas. *HFAs* may overlap with designated SRAs and LRAs. For purposes of the Ventura County Fire Code, areas classified as a *HFA* are designated as a Wildland-Urban Interface[10] area. Additional information on wildfires and *fire hazards* specific to Ventura County can be found in Section 11.3 of the Ventura County General Plan Background Report.

California law requires the State Fire Marshal to identify *FHSZ* areas based on the severity of *fire hazard* that is expected to prevail there. These areas, or "zones" are identified based on factors such a fuel (material that can burn), slope, and weather. There are three zones, based on increasing *fire hazard*: moderate, high, and very high. Within unincorporated Ventura County, *FHSZs* are located in mountainous or hillside areas where the greatest fuel density exists and are classified as very high *FHSZ*.

By their designation, *HFAs* are prone to wildland fires and have a higher potential for severe fire events. Because the effects of a wildfire are not limited to development within a *HFA*, and can easily spread to *adjacent* communities, any development in or *adjacent* to a *HFA* is at risk of wildfire. The adopted Ventura County Multi-Jurisdictional Hazard Mitigation Plan identifies mitigation strategies to minimize *fire hazard* risks, discourages development in *HFAs*, and requires development to implement a variety of best management practices and design standards to ensure development is fire resistant. In addition, the adopted Ventura County Emergency Operations Plan provides guidance for responding to large-scale emergencies. While compliance with local, state, and federal requirements reduces risk to new development, this risk cannot be completely eliminated.

22.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below. California Environmental Quality Act (CEQA) Guidelines Section 15126.2(a) provides guidance for when and how the effects of locating projects in hazardous or vulnerable locations should be analyzed under CEQA. A *Lead Agency* is not required to perform "reverse CEQA analysis" by analyzing the impacts of the existing environment on the

[10] A wildland-urban interface is defined in the Ventura County Fire Code, as may be amended, which states: a geographical area identified by the state as a *FHSZ* in accordance with the Public Resources Code Sections 4201 through 4204 and Government Code Sections 51175 through 51189, or other areas designated by the Ventura County Fire Protection District to be at a significant risk from wildfires, including *HFAs*.

project and its future users unless the project has a reasonably foreseeable risk of causing or exacerbating existing environmental hazards by bringing development or people into the area affected. Within this analytical framework, CEQA Guidelines Section 15126.2(a) states that "the EIR should evaluate any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions… including both short-term and long-term conditions, as identified in authoritative hazard maps, risk assessments or in land use plans addressing such hazards areas." The thresholds of significance below should be interpreted and applied in accordance with this guidance.

WIL-1 If located in or *adjacent* to an *HFA*, a project may have a significant impact if it would exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

WIL-2 If located in or *adjacent* to an *HFA*, a project may have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving wildfire, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes.

WIL-3 If located in or *adjacent* to an *HFA*, a project may have a significant impact if it would require the installation or maintenance of infrastructure to accommodate the project (such as roads, *fuel breaks*, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in substantial temporary or ongoing impacts to the environment.

WIL-4 If located in or *adjacent* to an *HFA*, a project may have a significant impact if it would substantially impair or obstruct implementation of the Ventura County Emergency Operations Plan.

WIL-5 If located in or *adjacent* to an *HFA*, a project may have a significant impact if it would substantially impair or obstruct primary or alternative evacuation routes.

22.3 IMPACT ANALYSIS

The *Lead Agency* should review, in consultation with the Ventura County Fire Protection District (VCFPD), the project description materials (site plan, grading plans, etc.), topographic maps and aerial maps, and if necessary, visit the project site in order to determine the following:

- Whether the project site is located in or *adjacent* to a *HFA*. Consult with the VCFPD for maps and digital map layers that depict the most up-to-date boundaries of the *HFA*. Projects located within a *HFA* shall be required to provide a *Fire Protection Plan* prepared by a qualified fire protection consultant as approved by the *Lead Agency* in consultation with VCFPD. Refer to Section 4903 of the Ventura County Fire Code for guidance on preparing a *Fire Protection Plan*.
- Evaluate whether the project would result in or substantially exacerbate risk of loss, injury, or death involving wildfire, including exposure to pollutant concentrations from a wildfire, downslope or downstream flooding or landslides resulting from post-fire runoff, slope instability, or drainage changes.

- Evaluate whether the project includes design measures to create defensible space, installation or maintenance of infrastructure such as roads, *fuel breaks*, emergency water sources, power lines, or other utilities. Determine whether the installation or maintenance of such infrastructure would exacerbate risk of loss, injury, or death involving wildfire, or would result in substantial temporary or ongoing impacts to the environment.
- Determine whether access to and from the project site would impair, hinder, or otherwise obstruct the implementation of the Ventura County Emergency Operations Plan.
- Determine whether the project would impair, hinder, or otherwise obstruct primary or alternative evacuation routes. Consult with the Ventura County Sheriff's Office and VCFPD to verify primary or alternative evacuation routes within the vicinity of the project.

Projects are required to comply with state laws regarding defensible space (Cal. Code Regs. Title 14, Section 1299.03 *et seq.*) and minimum fire safe regulations (Cal. Code Regs. Title 14, Section 1270.00 *et seq.*), Ventura County Building Code, and the Ventura County Fire Code. The Ventura County Fire Code requires the clearing of brush, flammable vegetation, or combustible growth within 100 feet of structures or buildings; automatic fire sprinklers in buildings; access roads/driveways and water supplies for first responder use and for safety precautions within *HFAs*. Site-specific constraints may require additional mitigation to reduce *fire hazard* risk to a less than significant level. Consult with the VCFPD to determine whether the project would result in potentially significant impacts and whether mitigation measures would be required.

Preparation of Initial Study Checklist

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 22.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

a) If located in or adjacent to an HFA, would the project exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

A determination of **No Impact (N)** shall be made when the proposed project is not located in or *adjacent* to a *HFA*.

A determination of **Less than Significant Impact (LS)** shall be made when a project is located in or *adjacent* to a *HFA*, which has the potential to exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, but the project will comply with all applicable state and federal regulations, the Ventura County Building Code, and the Ventura County Fire Code and no additional mitigation is needed to reduce the potential impact to a less than significant level .

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made when it has been determined that the project will result in or substantially exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. However, mitigation measures have been identified to reduce such risk to a less than significant level. Proposed mitigation measures shall be reviewed and approved by the VCFPD.

A determination of **Potentially Significant Impact (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project will result in or substantially exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and an EIR will be required to further analyze the impact.

b) If located in or adjacent to an HFA, would the project expose people or structures to a significant risk of loss, injury or death involving wildfire, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes?

A determination of **No Impact (N)** shall be made when the proposed project is not located in or *adjacent* to a *HFA*.

A determination of **Less than Significant Impact (LS)** shall be made when a project is located in or *adjacent* to a *HFA*, which has the potential to expose people or structures to a significant risk of loss, injury or death involving wildfire, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes, but the project will comply with all applicable state and federal regulations, the Ventura County Building Code, and the Ventura County Fire Code and no additional mitigation is needed to reduce the potential impact to a less than significant level.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made when the project will result in or substantially expose people or structures to a significant risk of loss, injury, or death involving wildfire, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. However, mitigation measures have been identified to reduce such risk to a less than significant level. Proposed mitigation measures shall be reviewed and approved by the VCFPD.

A determination of **Potentially Significant Impact (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project will result in or substantially expose people or structures to a significant risk of loss, injury, or death involving wildfire, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes, and an EIR will be required to further analyze the impact.

c) If located in or adjacent to an HFA, would the project require the installation or maintenance of infrastructure to accommodate the project (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in substantial temporary or ongoing impacts to the environment?

A determination of **No Impact (N)** shall be made when the proposed project is not located in or *adjacent* to a *HFA*.

A determination of **Less than Significant Impact (LS)** shall be made when a project is located in or *adjacent* to a *HFA*, and requires the installation or maintenance of infrastructure to accommodate the project, which has the potential to exacerbate fire risk or result in temporary or ongoing impacts to the environment, but the project will comply with all applicable state and federal regulations, the Ventura County Building Code, and the Ventura County Fire Code and no additional mitigation is needed to reduce the potential impact to a less than significant level.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made when the project requires the installation or maintenance of infrastructure to accommodate the project, which will exacerbate fire risk or result in temporary or ongoing impacts to the

environment. However, mitigation measures have been identified to reduce such risk to a less than significant level. Proposed mitigation measures shall be reviewed and approved by the VCFPD.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project requires the installation or maintenance of infrastructure to accommodate the project, which will exacerbate fire risk or result in temporary or ongoing impacts to the environment, and an EIR will be required to further analyze the impact.

d) If located in or adjacent to an HFA, would substantially impair or obstruct implementation of the Ventura County Emergency Operations Plan?

A determination of **No Impact (N)** shall be made when the proposed project is not located in or *adjacent* to a *HFA*.

A determination of **Less than Significant Impact (LS)** shall be made when a project is located in or *adjacent* to a *HFA*, and has the potential to impair or obstruct implementation of the Ventura County Emergency Operations Plan, but the project will comply with all applicable state and federal regulations, the Ventura County Building Code, and the Ventura County Fire Code and no additional mitigation is needed to reduce the potential impact to a less than significant level.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made when the project would substantially impair or obstruct implementation of the Ventura County Emergency Operations Plan. However, mitigation measures have been identified to reduce such risk to a less than significant level. Proposed mitigation measures shall be reviewed and approved by the VCFPD.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would substantially impair or obstruct implementation of the Ventura County Emergency Operations Plan, and an EIR will be required to further analyze the impact.

e) If located in or adjacent to an HFA, would substantially impair or obstruct primary or alternative evacuation routes?

A determination of **No Impact (N)** shall be made when the proposed project is not located in or *adjacent* to a *HFA*.

A determination of **Less than Significant Impact (LS)** shall be made when a project is located in or *adjacent* to a *HFA*, and has the potential to impair or obstruct primary or alternative evacuation routes, but the project will comply with all applicable state and federal regulations, the Ventura County Building Code, and the Ventura County Fire Code and no additional mitigation is needed to reduce the potential impact to a less than significant level.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made when the project would impair or obstruct primary or alternative evacuation routes. However, mitigation measures have been identified to reduce such risk to a less than significant level. Proposed mitigation measures shall be reviewed and approved by the VCFPD.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would substantially impair or obstruct primary or alternative evacuation routes, and an EIR will be required to further analyze the impact.

22.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
Fire Hazard Severity Zones in Local Responsibility Areas (LRAs)	Office of the State Fire Marshal	Website
Fire Hazard Severity Zones in State Responsibility Areas (SRAs)	Office of the State Fire Marshal	Website
Ventura County Building Code	Ventura County RMA Building & Safety Division	Website
Ventura County Fire Code (Ordinance Number 32)	Ventura County Fire Department	PDF | Website
Ventura County General Plan Background Report, Chapter 11	Ventura County RMA Planning Division	PDF | Website
Ventura County Multi-Jurisdictional Hazard Mitigation Plan	Ventura County Sheriff's Office of Emergency Services	PDF | Website
Ventura County Emergency Operations Plan	Ventura County Sheriff's Office of Emergency Services	PDF | Website

23. Hazardous Materials and Waste

23.1 BACKGROUND AND CONTEXT

Pursuant to California Health and Safety Code (HSC) Section 25260, "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 the environment. Hazardous materials include, but are not limited to, hazardous substances as defined in HSC Section 25281 or 25316, hazardous waste as defined in HSC Section 25117, and any material that the Ventura County *Certified Unified Program Agency (CUPA)* determines to be potentially injurious to the health and safety of persons or harmful to the environment if released into the environment.

For a more complete list of definitions related to hazardous materials, refer to the following:

- Aboveground Petroleum Storage Act: HSC Chapter 6.67, Section 25270.2;
- *Hazardous Materials Business Plan*: HSC Chapter 6.95, Section 25501; and
- *Underground Storage Tanks*: HSC Chapter 6.7, Section 25281; CCR Title 23, Division 3, Chapter 16, Article 1, Section 2611.

"Hazardous waste" includes the following:

- Any waste or combination of wastes, which because of quantity, concentration, physical or chemical, or infectious characteristics, may cause or significantly contribute to serious illness or death, or an increase in serious irreversible, or incapacitating reversible illness; or may pose a substantial present or potential threat to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.
- A waste that meets any of the criteria for the identification of a hazardous waste adopted by the State Department of Toxic Substances Control pursuant to the California Health and Safety Code, Division 20, Chapter 6.5 and California Code of Regulations, Title 22, Division 4.5. These substances may be poisons, corrosive chemicals, flammable materials, explosives and oxidizers and reactive materials or substances when tested in accordance with the criteria in California Code of Regulations, Title 22.

For a more complete list of definitions for hazardous waste, refer to California Health and Safety Code, Division 20, Chapter 6.5, Article 2.

Hazardous materials and hazardous waste are generated by a diverse range of industries in the county including agriculture, aerospace, on-shore and off-shore petroleum exploration, biotech, military, automotive services, public utilities, and various manufacturing and service industries. According to the Ventura County General Plan Background Report, there are over 2,600 facilities within Ventura County that store and use hazardous materials, maintain above ground and underground hazardous substance storage tanks, and generate hazardous waste. The majority of

hazardous waste generated in the county is comprised of used oil, waste solvents, and waste batteries.

23.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

HAZ-1 A project may have a significant impact if it would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

HAZ-2 A project may have a significant impact if it would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

HAZ-3 A project may have a significant impact if it would generate substantial hazardous emissions or handle substantial amounts of hazardous or *acutely hazardous waste,* materials, or substances within one-quarter mile of an existing or proposed school.

HAZ-4 A project may have a significant impact if it would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

23.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 23.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

Assessment of Hazardous Materials

Review the project and related project materials, and consult with the *CUPA* to obtain the following information:

a. Determine whether the proposed project would routinely transport, use, generate, or dispose of hazardous materials in a quantity that is subject to the following state and local regulations as enforced by the *CUPA* and/or the Ventura County Fire Protection District (VCFPD):

- *Underground Storage Tanks* - California Health and Safety Code, Division 20, Chapter 6.7 and the California Code of Regulations Title 23, Division 3, Chapter 16.
- Aboveground Petroleum Storage Act - California Health and Safety Code, Division 20, Chapter 6.67.
- *Hazardous Materials Business Plan* - California Health and Safety Code, Division 20, Chapter 6.95, Article 1.
- *Risk Management Plan* - California Health and Safety Code, Division 20, Chapter 6.95, Article 2.

- Certified Unified Program Agency - California Health and Safety Code, Division 20, Chapter 6.11.
- Ventura County Fire Code, as adopted and amended from time to time by the VCFPD, in regard to above ground hazardous materials.

b. Determine whether the project would utilize and require the installation of underground hazardous materials storage tanks.

c. Determine if existing *underground storage tanks* are on-site, and if they are in compliance with the testing and monitoring requirements set forth in the California Health and Safety Code, Division 20, Chapter 6.7 and the California Code of Regulations Title 23, Division 3, Chapter 16. Consult with the Ventura County Resource Management Agency, Environmental Health Division and determine if any enforcement or compliance actions are pending. The Environmental Health Division may require that any violations be remedied as part of the project.

d. Consult with the Environmental Health Division to determine whether the project would result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials or hazardous waste into the environment, including groundwater.

e. Consult with the Environmental Health Division to determine whether the project would generate substantial hazardous emissions or handle substantial amounts of hazardous or *acutely hazardous waste*, materials, or substances within one-quarter mile of an existing or proposed school.

f. Determine whether the project is located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Assessment of Hazardous Waste

Review the project and related project materials, and consult with the *CUPA* to obtain the following information:

a. Determine whether the project would generate hazardous waste that is subject to the following state and local regulations:
   - California Code of Regulations, Title 22, Division 4.5.
   - California Health and Safety Code, Division 20, Chapter 6.5.
   - Ventura County Ordinance Code, Division 4, Chapter 5 (Hazardous Substances), Article 1, (Certified Unified Program Agency).

b. Determine whether the project is located in an area with access to public sewer service or whether the project will utilize an onsite wastewater treatment system. Also refer to Section 25, Utilities and Service Systems, for additional thresholds and guidelines related to wastewater treatment and sewage facilities.

c. Determine whether the project is located in a sensitive *groundwater basin*. Also refer to Section 9, Water Resources, for additional thresholds and guidelines related to groundwater.

Preparation of Initial Study Checklist

The following information should be used to complete the Initial Study Checklist:

(a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

A determination of **No Impact (N)** shall be made if the project would not transport, use, or dispose of hazardous materials and would not generate hazardous waste.

A determination of **Less Than Significant Impact (LS)** shall be made if the project would transport, use, or dispose of hazardous materials, or generate hazardous waste in compliance with state and local regulations enforced by the Environmental Health Division and/or VCFPD.

A determination of **Less than Significant with Mitigation Incorporated (LS-M)** shall be made if the project would result in a potentially significant impact involving the transport, use, or disposal of hazardous materials, or generate hazardous waste, but project impacts could be mitigated to a less than significant level by project design or measures, or through adoption of specific project conditions.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an environmental impact report (EIR) if there is *substantial evidence* that the project would result in a potentially significant impact involving the transport, use, or disposal of hazardous materials, or generate hazardous waste.

(b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

A determination of **No Impact (N)** shall be made if the project would not create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

A determination of **Less Than Significant Impact (LS)** shall be made if the project has prepared a *Hazardous Materials Business Plan* and/or *Risk Management Plan* in compliance with state and local regulations, and/or would be connected to an onsite wastewater treatment system. Intentional or unintentional discharges of hazardous materials or improper disposal of hazardous waste may result in the release of hazardous substances into the environment. This is especially critical in commercial/industrial development, which may involve operations that generate hazardous materials or hazardous waste in high quantities. The *Hazardous Materials Business Plan* and/or *Risk Management Plan* shall include an emergency response plan for the inadvertent release, upset, or accident conditions involving hazardous materials or hazardous waste.

A determination of **Less than Significant with Mitigation Incorporated (LS-M)** shall be made if the project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, but project impacts could be mitigated to a less than significant level by project design or measures, or through adoption of specific project conditions.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. For example, the project may create a significant hazard where the intentional or unintentional release of hazardous materials or hazardous waste generated by the project would substantially degrade groundwater quality.

(c) Would the project generate substantial hazardous emissions or handle substantial amounts of hazardous or acutely hazardous waste, materials, or substances within one-quarter mile of an existing or proposed school?

A determination of **No Impact (N)** shall be made if the project would not generate hazardous emissions, or handle hazardous or *acutely hazardous waste*, materials, or substances and the project site is more than one-quarter mile away from an existing or proposed school.

A determination of **Less Than Significant Impact (LS)** shall be made if the project would generate hazardous emissions, or handle hazardous or *acutely hazardous waste*, materials, or substances more than one-quarter mile away from an existing or proposed school.

A determination of **Less than Significant with Mitigation Incorporated (LS-M)** shall be made if the project would generate hazardous emissions, or handle hazardous or *acutely hazardous waste*, materials, or substances within one-quarter mile away from an existing or proposed school, but project impacts could be mitigated to a less than significant level by project design or measures, or through adoption of specific project conditions.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would substantially generate hazardous emissions, or handle hazardous or *acutely hazardous waste*, materials, or substances within one-quarter mile away from an existing or proposed school.

(d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

A determination of **No Impact (N)** shall be made if the project would not be included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5.

A determination of **Less Than Significant Impact (LS)** shall be made if the project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5, and the project would not impair or obstruct any pending enforcement or compliance actions administered by the *CUPA* or the Regional Water Quality Control Board related to the listed site, or otherwise adversely impact the existing hazardous materials or hazardous waste stored onsite (e.g., *underground storage tanks*, or leaking underground fuel tanks as defined in HSC Section 25299.24).

A determination of **Less than Significant with Mitigation Incorporated (LS-M)** shall be made if the project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5, and the project would impair or obstruct any pending enforcement or compliance actions administered by the *CUPA* or the Regional Water Quality Control Board related to the listed site, or would otherwise adversely impact the existing hazardous materials or hazardous waste stored onsite (e.g., *underground storage tanks*, or leaking underground fuel tanks as defined in HSC Section 25299.24). However, project impacts could be mitigated to a less than significant level by project design or measures, or through adoption of specific project conditions.

A determination of **Potentially Significant Impact (PS)** shall be made and further analysis shall be addressed in an EIR if the project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and cause a significant

hazard to the public or environment through generation of hazardous emissions, or handling of hazardous or *acutely hazardous waste*, materials, or substances at the project site.

23.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
California Health and Safety Code (HSC)	State of California	Website
Cortese List Data Resources (compiled pursuant to Government Code 65962.5)	California Environmental Protection Agency	Website
National Ambient Air Quality Standard (NAAQS)	United States Environmental Protection Agency	Website
Ventura County Fire Code (Ordinance Number 32)	Ventura County Fire Department	PDF | Website
Ventura County General Plan Background Report, Chapter 8	Ventura County RMA Planning Division	PDF | Website
Ventura County Hazardous Materials Business Plan Program	Ventura County RMA Environmental Health Division	Website

24. Public Services

This section covers a broad range of public services that should be evaluated for impacts resulting from a proposed discretionary project including law enforcement, emergency services, fire protection, schools, and libraries.

24.1 BACKGROUND AND CONTEXT

24.1.1 Law Enforcement/Emergency Services

The California Highway Patrol handles all traffic enforcement and automobile accident investigations for the unincorporated areas of Ventura County. The California Highway Patrol Station in Moorpark shares its facilities with the Moorpark Police Services Center and serves approximately 650 miles of freeways, state routes, and unincorporated county roads, and many unincorporated areas of the county, including Oak Park, Newbury Park, Lynn Ranch, Somis, and Piru.

The Sheriff's Office oversees the county jail system and the investigation of all criminal activities occurring in the unincorporated areas. Beyond providing law enforcement services to the unincorporated county, the Sheriff's Office is also contracted to provide services to five of the county's ten incorporated cities (Thousand Oaks, Camarillo, Moorpark, Fillmore, and Ojai). There are seven patrol stations, as shown in Figure 7-11 in Section 7.5 of the Ventura County General Plan Background Report ("Background Report").

The Ventura County Sheriff's Office of Emergency Services (OES) works with all County departments, cities, public and private organizations, community, and civic groups to lead a "whole community" emergency management program. OES responsibilities include emergency management preparedness, planning, emergency alerts and warnings, implementation of emergency evacuation and shelter plans, maintenance and operation of the County Emergency Operations Center, and leading recovery operations.

The Ventura County Public Health Department includes the Ventura County Emergency Medical Services Agency. This Agency provides oversight and guidance of the delivery of emergency medical services throughout Ventura County.

24.1.2 Fire Protection Services

The Ventura County Fire Protection District (VCFPD) provides fire protection services to the unincorporated areas of the county and seven of the 10 incorporated cities: Thousand Oaks, Simi Valley, Moorpark, Camarillo, Port Hueneme, Santa Paula, and Ojai. VCFPD provides a range of programs and services that includes fire protection planning, fire prevention education, fire law and code enforcement, fire suppression and recovery, first responder level emergency medical services, and assistance and support for other non-fire emergencies such as floods, earthquakes, and other disasters.

The locations of VCFPD fire stations are shown in Figure 7-12 in Section 7.6 of the Background Report. Each fire station has a staffed fire engine; strategic stations (Stations 23, 27, 35, 41 and 54) also have a staffed fire truck, with specific tools to perform responsibilities including forcible entry, search and rescue, clearing smoke and gas from a building, and turning off utility services.

24.1.3 Public Schools

The term "public schools" includes public elementary, secondary and college level educational facilities. Ventura County public schools include 21 school districts. Of the 21 districts, 12 are "unified," meaning they serve grades K-12. The remaining nine consist of seven elementary school districts and two high school districts. Table 7-19 of the Background Report lists school districts in the county. Figure 7-15 in Section 7.9 of the Background Report and *County View* and the Ventura County *Resource Management Agency Geographic Information System (and RMA GIS) Viewer* depict the school districts, all of which comprise Ventura County's K-12 public education system.

24.1.4 Public Libraries

The Ventura County Library System provides services to all Ventura County residents, and serves unincorporated areas and cities, or areas within cities, which are neither served by a city library nor within the boundaries of independent library districts. The Ventura County Library System operates an administrative office in Ventura and branch libraries throughout the county. Table 7-22 in Section 7.10 of the Background Report lists the branch locations, number of hours each library is open per week, and square footage of each facility, and Figure 7-16 in Section 7.10 of the Background Report shows their locations.

24.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following threshold of significance specified below.

PUB-1 A project may have a significant impact if it would substantially interfere with law enforcement/emergency services, fire protection, schools, libraries, or other public facilities; or involve the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for law enforcement/emergency services, fire protection, schools, libraries, or other public facilities.

24.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 24.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project substantially interfere with the following public services, or involve the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for these public services?

- *Law enforcement/emergency services;*
- *Fire protection;*
- *Schools;*

- *Libraries; or*
- *Other public facilities*

Law Enforcement/Emergency Services

Public safety depends on the timely availability of law enforcement and public safety personnel. Projects that increase demand for law enforcement or emergency services may have an adverse impact on public safety unless mitigated.

A proposed project should be reviewed by the Sheriff's Office and the VCFPD to determine whether the project would result in a potentially significant increase in demand for law enforcement or emergency services.

Projects should include security measures to address potential increases in theft, vandalism, disturbances, and/or substance abuse that could affect public safety in the surrounding area. Such security measures could include:

- nighttime security lighting;
- cameras;
- alarms;
- fencing;
- window and door locks;
- private security patrols;
- special event security assistance;
- treatment of vulnerable surfaces with anti-graffiti coating or landscaping;
- removal of graffiti within a specified time period; and/or
- other design measures to create a securely-defensible space.

Projects that include adequate security measures as determined by the Sheriff's Office would have a less than significant project-specific and cumulative impact on law enforcement and emergency services. Projects that do not include adequate measures to address increased demand for law enforcement or emergency services may be considered to have a potentially significant project-specific and cumulative impact.

Fire Protection Services

VCFPD staff shall review the project materials (site plans, grading plans, etc.) to determine the distance to the nearest full-time fire station. A site visit shall be conducted, if necessary, for an accurate measurement.

Distance/response time is the relationship between the distance that fire protection service facilities and equipment are located from the scene of the emergency, and how quickly they are able to respond to the emergency. A project may be considered to have a potentially significant impact if the project is more than five miles from a full-time fire department as measured from the apron of the fire station to the structure or pad of the proposed structure. Typically, a response time greater than 8 minutes and 30 seconds for unincorporated urban areas and 12 minutes for unincorporated rural areas may potentially result in an adverse impact on fire protection services. Rural areas are

generally those zoned for rural and agricultural uses located within 12 minutes of driving distance of a VCFPD fire station (a map of all VCFPD fire stations is available on the VCFPD website). Unincorporated areas of the county that are outside of urbanized areas are expected to have response times exceeding 12 minutes and may have response times of 30 minutes or more. Examples of such areas may include, but not limited to unincorporated areas of Ventura County in the Santa Monica Mountains, South Mountain, Sulfur Mountain, Backside of Lake Casitas, upper Highway 33 north of Ojai, Lockwood Valley, Rose Valley, and Black Canyon. Consult with VCFPD to estimate the project's response time and to determine whether the project's estimated response time would result in a potentially significant impact.

The amount and types of fire department personnel/equipment/facilities deployed vary depending on the nature of the emergency. VCFPD has determined that one firefighter is required per 3,000 to 4,000 persons, depending on the population density of the area to be serviced. To provide one firefighter 24 hours per day, 365 days per year, it is necessary to have four firefighter employees. There may be cases where a project would increase the need for fire protection services, which could result in the need for additional firefighter employees. In such cases, increases in revenue from assessed property value is typically used to accommodate increases in staffing. Therefore, such impacts to firefighter employees would be less than significant.

Impacts on fire department equipment and facilities may become significant when the magnitude of the project or the distance from existing facilities indicates that new or physically altered facilities or equipment would be required to serve the proposed project. For example, this may be the case for projects that would result in additional large concentrations of people, such as amusement parks, conference centers, and retirement communities, which can generate substantially higher demands on emergency services. Mitigation measures such as dedication of land for a new building site and availability of funds for facility operations or equipment could reduce the significant impact to less than significant, although the potential environmental impacts associated with constructing such new facilities would also need to be considered.

Public Schools

Projects located near schools shall be referred to the appropriate public school district for review and comment regarding the project's impact on the school. Any potential environmental impact on public school facilities that is not related to demand shall be discussed and analyzed under the appropriate subject area of the Initial Study Checklist. For example, if a potential noise or traffic safety issue related to a nearby school is identified, that discussion shall be included in the respective noise or traffic safety section of the Initial Study Checklist.

Typically, non-residential projects would not have an impact on the demand for schools. All residential projects (except senior citizen housing) would have an impact on schools and shall be sent to the appropriate public school district for review and comment (see *County View* and *RMA GIS Viewer* or contact RMA GIS staff to determine the applicable school district).

Large residential projects, (including new subdivisions) have the potential to impact a school district's ability to adequately serve additional students if classroom capacities are exceeded. However, Government Code Section 65995, (also referred to as SB 50, 1998), imposes limitations on the power of cities and counties to deny projects or require mitigation of school facility impacts as a condition of approval. Rather, the law authorizes school districts to levy developer fees. State law deems these fees to be "full and complete school facilities mitigation." Unless the school district responds otherwise, it is assumed that the district is collecting these state-authorized fees.

Public Libraries

A project may result in an adverse impact on public library facilities and services if it would interfere with the operations of an existing public library facility, put additional demands on a public library facility that is currently considered overcrowded by the Ventura County Library System, limit the ability of individuals to access public library facilities by private vehicle or alternative transportation modes, including walking, or cause a library facility to become overcrowded as determined by the Ventura County Library System.

Non-residential projects would not, in general, have an impact on the demand for public libraries. However, non-residential projects located near public library facilities shall be referred to the Director of Library Services for review. Consult with the Director of Library Services to determine whether nearby public library facilities are considered overcrowded or would become overcrowded as a result of the project.

Residential projects, including senior citizen housing, that may have an impact on public library facilities shall be sent to the Director of Library Services for review. The location of all public libraries under the control of the County of Ventura can be found in Figure 7-16 of the Background Report with further details listed for each library on Table 7-22.

If the project would result in significant impacts on public library facilities and services, mitigation should be provided to reduce impacts. Mitigation measures may include dedication of land for a new library facility and/or funding for facility operations or equipment to reduce the significant impact to less than significant, although the potential environmental impacts associated with constructing such new facilities would also need to be considered.

Other Public Facilities

The *Lead Agency* should consider whether the project would substantially interfere or involve the provision of new or physically altered public facilities such as, but not limited to, public governmental buildings, facilities for non-agricultural water storage, water treatment and distribution, sewage facilities, flood control/stormwater control facilities, gas or electrical generation and distribution facilities, and transportation and transit facilities. The *Lead Agency* should consult with the appropriate public agency responsible for administering such facility regarding the project's potential impacts on the facility, and identify measures to mitigate any potentially significant impacts, if any.

Preparation of Initial Study Checklist

The following information shall be used to complete the Initial Study Checklist:

A determination of **No Impact (N)** shall be made if the project results in one or more of the following:

- Is not considered as one of the categories of projects that could generate a potentially significant increase in demand for law enforcement or emergency services.
- Has a response time that does not exceed 8 minutes and 30 seconds in urban areas and does not exceed 12 minutes in rural areas from the nearest full-time fire station.
- Is a non-residential project that is not located near a public school or public library.

A determination of **Less than Significant Impact (LS)** shall be made if the project would result in one or more of the following:

- Includes appropriate security measures, as determined by the Sheriff's Office, where applicable, to address potential increases in theft, vandalism, disturbances, and/or substance abuse that could affect public safety in the surrounding area.
- Is located outside of urbanized areas but would have an acceptable response time as determined by VCFPD.
- Would be located near a public school, but the project will not substantially interfere with the operations of, or increase demand on, public school facilities.
- Would be located near a public library, but the project will not substantially interfere with the operations of a public library, put additional demands on a public library that is currently considered overcrowded, or limit the ability of individuals to access the library.

A determination of **Less than Significant Impact with Mitigation Incorporated (LS-M)** shall be made if the project would result in one or more of the following:

- Has prepared an emergency response plan that identifies mitigation measures to reduce the impact to a less than significant level. Proposed mitigation measures shall be reviewed by the Sheriff's Office and VCFPD. Mitigation measures may include provisions for new facilities, personnel, and funding.
- Would have an unacceptable extended response time as determined by VCFPD, which would result in a need for new or physically altered fire protection facilities or equipment in order to maintain acceptable service ratios, response times, or other performance objectives of fire protection services. However, the project has identified mitigation measures acceptable to the VCFPD to reduce the impact to a less than significant level. Mitigation measures may include provisions for new facilities, equipment, personnel, and/or funding.
- Would substantially interfere with the operations of or increase the demand for a public school. However, mitigation measures are provided to reduce those impacts to a less than significant level.
- Would substantially interfere with the operations of a public library, put additional demands on a public library that is currently considered overcrowded, or limit the ability of individuals to access the public library. However, mitigation measures are provided to reduce those impacts to a less than significant level. Mitigation measures may include provisions for new facilities, equipment, personnel, and/or funding.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an Environmental Impact Report if there is *substantial evidence* that the project would result in one or more of the following:

- Substantially interfere with or increase demand for law enforcement or emergency services without having prepared an adequate emergency response plan; or require new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives of law enforcement or emergency services.
- Substantially interfere with or increase demand for fire protection; or require new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives of fire protection services.

- Substantially interfere with or increase demand for public schools; or require new or physically altered governmental facilities in order to maintain acceptable service levels or other performance objectives of public schools.
- Substantially interfere with the operations of a public library, put additional demands on a public library that is currently considered overcrowded, or limit the ability of individuals to access the library; or require new or physically altered governmental facilities in order to maintain acceptable service levels or other performance objectives of public libraries.

24.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
County View	Ventura County Geographic Information Systems	Website
Ventura County General Plan Background Report, Chapter 7	Ventura County RMA Planning Division	PDF | Website
Ventura County Fire Stations	Ventura County Fire Department	Website
Ventura County RMA Geographic Information Systems Viewer	Ventura County Information Technology Services	Website

25. Utilities and Service Systems

25.1 BACKGROUND AND CONTEXT

25.1.1 Water Supply

A domestic supply of potable water is that which is used for human consumption or is connected to domestic plumbing fixtures in which the supply is obtained from an approved *individual water system*, a *state small water system* operating with a permit from the Ventura County Resource Management Agency (RMA) Environmental Health Division, or a *public water system* operating with a permit from the California State Water Resources Control Board, Division of Drinking Water.

Fire flow is a component of a water supply system and is defined as the number of gallons per minute of water at a minimum residual pressure of 20 pounds per square inch, for a designated duration available from a fire hydrant in the event of an emergency.

This section also considers requirements for a private water system when the project is not provided with water from a purveyor. Specific concerns for private water systems include, but are not limited to, flow, pressure, duration, and reliability.

Additional information on the existing conditions of the water supply in Ventura County is provided in Chapter 10 of the Ventura County General Plan Background Report ("Background Report").

25.1.2 Solid Waste Management

Solid waste operations and facilities involve solid waste handling, storage, processing, and disposal activities that are subject to solid waste regulations enforced by the *Local Enforcement Agency*/RMA Environmental Health Division.

Sufficient permitted solid waste disposal capacity must be available to accommodate the solid waste disposal needs of current demand and new projects. Any project generating municipality-scale amounts of solid waste would impact solid waste disposal capacity in Ventura County.

California law requires county governments to prepare and adopt a Countywide Siting Element as part of their Countywide Integrated Waste Management Plan. Title 14, Section 18755 of the California Code of Regulations states that the Countywide Siting Element "shall demonstrate that there is a countywide or region-wide minimum of 15 years of combined permitted disposal capacity, through existing or planned solid waste disposal and transformation facilities or through additional strategies."

Many landfills are privately owned and operated, as are many refuse disposal companies that deliver waste to landfills. While some exceptions exist locally, in general, landfills may accept refuse from geographical areas beyond the county in which the facility is located and refuse haulers may deliver waste to any disposal facility. Market forces, therefore, can have a large impact upon the waste disposal capacity in a county.

Although the County of Ventura maintains responsibility for ensuring adequate permitted disposal capacity in Ventura County, it currently lacks the statutory authority to direct or restrict the flow of waste to local disposal facilities or to extend disposal capacity in the county. Therefore, the County must determine and plan for disposal capacity based on remaining capacity and permitted lifespans of local landfills and both existing, as well as anticipated market conditions, including facility development and expansion plans. If this analysis shows there may be less than 15 years of disposal capacity within Ventura County, Title 14, Section 18755 requires the County to develop strategies addressing this shortfall.

Additional information on waste management and disposal is provided in Section 7.3 of the Background Report.

25.1.3 Utilities

Electricity

Electrical facilities include generation plants and energy production from renewable sources facilities, transmission substations, and transmission lines. Electricity in Ventura County is primarily produced and delivered by the Clean Power Alliance and Southern California Edison. The U.S. Bureau of Reclamation Central Valley Project also provides some electricity to the agricultural water pump sector, as defined by the California Energy Commission.

Natural Gas

Gas utilities consist of a fixed transmission and distribution system for natural gas which supplies Ventura County. This system also includes underground and above-ground natural gas storage facilities. The Southern California Gas Company provides service to all the cities and communities in Ventura County and owns natural gas transmission lines throughout Ventura County.

Communication and Telecommunication

Communication facilities consist of, but are not limited to, radio and television transmitting and receiving antennas, radar stations, microwave towers and cellular and hard-line telephone facilities. According to the California Public Utilities Commission, telecommunications services include basic phone; long distance phone; Internet, including broadband and wireless; enhanced specialized mobile radio; personal communication services (i.e., messaging and data transfer service such as paging); and paging systems.

The California Public Utilities Commission defines broadband by the definition provided by the National Telecommunications and Information Administration. By this definition, broadband is a "two-way data transmission to and from the Internet with advertised speeds of at least 768 kilobits per second (kbps) downstream and at least 200 kbps upstream to end users." The California Public Utilities Commission provides two kinds of mapped data depicting areas for broadband services: service availability and service status (the latter describes areas where broadband is available, but where access is limited due to relatively slow download and upload speeds). Within these two categories, information is provided showing types of broadband services. These types include wireline (technology that uses wires or cables to physically connect the provider with the user, such as Cable Modem or Digital Subscriber Line), fixed wireless (which uses radio waves to connect providers and a fixed location – this is not currently available in Ventura County), and mobile (such as cell phone or other devices that are mobile and therefore not used at a fixed location).

Additional information on communication facilities in Ventura County is provided in Section 7.4 of the Background Report.

Onsite Wastewater Treatment Systems (OWTS)

Onsite wastewater treatment systems (OWTS) are systems that dispose of domestic waste (sewage) generated by individual residences and businesses located in areas without access to public sewer service. These are also referred to as septic systems. County Service Area 32 is a countywide monitoring and maintenance district created to monitor and regulate *OWTS* in all areas outside of cities and sanitation/sanitary districts. Typically, when a property requires use of an *OWTS* within County Service Area 32, the property owner may need to grant an easement to the County for access to the property for inspection, operation, maintenance, repair, construction, and reconstruction of the *OWTS*. The easement is reviewed by the RMA Environmental Health Division, and if it is accepted, it is recorded by the Ventura County Public Works Agency (PWA).

Sewage Collection/Treatment Facilities

Sewage collection/treatment facilities are those which collect wastewater from domestic, commercial, industrial and institutional uses, treat it to remove organic and inorganic hazardous or noxious waste materials, and discharge the treated effluent.

Wastewater collection, treatment, recycling, and disposal in Ventura County is provided by 19 agencies, districts, or service providers (shown in Figure 7-1 of the Background Report). The unincorporated area is served by 16 of these organizations, including the County of Ventura, county service areas, special districts, cities, and contract organizations (see Table 7-1 of the Background Report). The PWA is responsible for administration, billing, customer service, operation, maintenance, design, inspection, and facility construction for County Service Areas 29, 30, and 34, Ventura Waterworks Districts 1 and 16, and the Camarillo Utility Enterprise and Todd Road Jail Wastewater Treatment Plant.

Additional information on wastewater collection and treatment is provided in Section 7.1 of the Background Report.

25.1.4 Pipelines

Section 15284(d) of the California Environmental Quality Act (CEQA) Guidelines defines “pipeline” pursuant to Government Code Section 51010.5(a). This definition includes every intrastate pipeline used for the transportation of hazardous liquid substances or highly volatile liquid substances, including a common carrier pipeline, and all piping containing those substances located within a refined products bulk loading facility which is owned by a common carrier and is served by a pipeline of that common carrier, and the common carrier owns and serves by pipeline at least five such facilities in California.

25.2 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

UTI-1 A project may have a significant impact if it would a) conflict with applicable state or local requirements related to safe drinking water, water supply, and fire flow, and b) result in a significant adverse environmental effect due to that conflict.

UTI-2 A project may have a significant impact if it would substantially increase *surface water* consumptive use (demand) in the following ways:

a. Within a fully appropriated stream reach as designated by the State Water Resources Control Board or where unappropriated *surface water* is unavailable; or

b. By diverting or dewatering downstream reaches, resulting in an adverse impact to one or more of the beneficial uses listed in the *Basin Plans*.

UTI-3 A project may have a significant impact if:

a. It would introduce physical development that would adversely affect the water supply of the *groundwater basin* and/or *hydrogeologic unit* in which the project is located; or

b. For a "water-demand project" (as defined in Section 15155 of the State CEQA Guidelines), it cannot be determined that the project would have sufficient water supplies during normal, single-dry, and multiple-dry water years for a 20-year projection to serve the project.

UTI-4 A project may have a significant impact if it would:

a. Conflict with applicable state or local requirements related to wastewater treatment and/or sewage collection/treatment, and result in a significant adverse environmental effect due to that conflict;

b. Increase demand to a level that would exceed a wastewater/sewer service provider's capacity; or

c. Require or result in the relocation or construction of new or expanded wastewater treatment or sewage facilities, the construction or relocation of which would cause significant environmental effects.

UTI-5 A project may have a significant impact if it would:

a. Conflict with applicable state or local regulations related to solid waste, including generating solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure that would reduce the local infrastructure's useful life to less than 15 years, or otherwise impair the attainment of solid waste reduction goals; and

b. Result in a significant adverse environmental effect due to that conflict.

UTI-6 A project may have a significant impact if it would cause a substantial disruption or re-routing of an existing utility facility, or substantially increases demand to a level that would require or result in the relocation or construction of new or expanded water, storm water drainage, electric power, natural gas, telecommunications, or other types of utility facilities, which would cause significant environmental effects.

UTI-7 A project may have a significant impact if it would substantially interfere with, compromise the integrity, or affect the operation of an existing pipeline that is currently in operation.

25.3 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 25.2, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below.

(a) Would the project a) conflict with applicable state or local requirements related to safe drinking water, water supply, and fire, and b) result in a significant adverse environmental effect due to that conflict?

The following state and local regulations should be considered when evaluating the project as it relates to safe drinking water, water supply, and fire flow.

Water Quality and Supply

- California Health and Safety Code, Division 104, Part 12, Chapters 4 through 7
- California Code of Regulations, Title 22, Division 4
- Porter-Cologne Water Quality Control Act (California Water Code)
- Ventura County Building Code, Article 1, Article 6
- Ventura County Ordinance Code, Division 4, Chapter 8
- Ventura County Waterworks Manual (VCWWM), latest edition
- Ventura County Fire Code

Note: Domestic water quality regulations for *public water systems* are enforced by the California State Division of Drinking Water.

Fire Flow

- Ventura County Fire Code
- VCWWM, latest edition

Preliminary Assessment

The PWA, RMA Environmental Health Division, and the Ventura County Fire Protection District (VCFPD), and the appropriate water agency that services the area in which the project is located shall review the project to evaluate the following:

- Whether the project requires a supply of domestic water, including fire flow where required. The fire flow for the project shall be determined based on the size of structures, construction type, use, and proximity to other structures.
- Whether domestic water and fire flow will be provided by a *water purveyor* or from an *individual water system*. If there is not an acceptable *water purveyor*, plans for a private water system shall be required in accordance with the applicable regulations identified above.
- If water is provided by a public *water purveyor*, the project applicant must confirm that the public *water purveyor* has a *Water Availability Letter (WAL)* approved by the PWA prior to

obtaining a Will Serve Letter[11] for the project. The California State Division of Drinking Water regulates and issues permits for *public water systems*. *State small water systems* are regulated and permitted by the RMA Environmental Health Division.

- If domestic water is obtained from an *individual water system*, water quality analysis shall be required in accordance with the applicable regulations identified above.

Chapter 10 of the Background Report contains lists of water agencies, suppliers, and purveyors within the major watersheds identified as Ventura River, Cuyama, Santa Clara River, Calleguas Creek, and Malibu Creek.

Preparation of Initial Study Checklist

The following information shall be used to complete the Checklist:

A determination of **No Impact (N)** shall be made if one or more of the following applies to the project:

- The proposed project does not require a supply of domestic water and there are no requirements for fire flow;
- Domestic water is obtained from a *water purveyor* operating with a *WAL* approved by the PWA and a valid permit from either the California State Division of Drinking Water or the RMA Environmental Health Division, and the *water purveyor* can meet applicable fire flow requirements for the project; or
- Domestic water is obtained from an individual source and the water quality analysis demonstrates compliance with the following drinking water standards, as applicable:
    1. "Primary drinking water standards," as defined in Health and Safety Code Section 116275(c), consist of:
        - Maximum levels of contaminants that, in the judgment of the state board, may have an adverse effect on the health of persons.
        - Specific treatment techniques adopted by the state board in lieu of *maximum contaminant levels* pursuant to Health and Safety Code Section 116365(j).
        - The monitoring and reporting requirements as specified in regulations adopted by the state board that pertain to *maximum contaminant levels*.
    2. "Secondary drinking water standards," as defined in Health and Safety Code Section 116275(d), specify *maximum contaminant levels* that, in the judgment of the state board, are necessary to protect the public welfare. Secondary drinking water standards may apply to any contaminant in drinking water that may adversely affect the odor or appearance of water and may cause a substantial number of persons served by the public water system to discontinue its use, or that may otherwise adversely affect the public welfare. Regulations establishing secondary drinking water standards may vary according to geographic and other circumstances and may apply to any contaminant in

[11] A Will Serve Letter is defined in the Ventura County Waterworks Manual, as may be amended, which states: A letter from a water purveyor declaring that the purveyor's system will provide a water connection to the proposed project identified in the letter. A water purveyor must have a *WAL* on file and be approved by the County Public Works Agency before the County of Ventura will accept a Will Serve Letter from the purveyor.

drinking water that adversely affects the taste, odor, or appearance of the water when the standards are necessary to ensure a supply of pure, wholesome, and potable water.

A determination of **Less than Significant Impact (LS)** shall be made when domestic water is obtained from an individual water source; fire flow is from a private source and the private water system is in compliance with the VCWWM and Ventura County Fire Code; fire sprinklers will be used to reduce fire flow in accordance with the VCWWM and Ventura County Fire Code; and/or the proposed project would utilize an *OWTS*. The use of an *OWTS* has the potential for contaminating groundwater supplies. However, compliance with the Ventura County Building Code would reduce any potential project and cumulative impacts to a less than significant level.

A determination of **Less than Significant Impact with Mitigation Incorporated (LS-M)** shall be made when project related and cumulatively potentially significant impacts to water quality 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 conditions. Mitigation measures shall be developed on a case-by-case basis.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an Environmental Impact Report (EIR) if there is *substantial evidence* that the project would have a significant impact on fire flow because:

- It would cause a significant environmental impact due to a conflict with the VCWWM and Ventura County Fire Code;
- It cannot provide an acceptable mitigation factor (e.g. fire sprinklers) to allow for a reduction in the required fire flow; or
- For a project involving a private water system, it cannot meet flow, duration, or reliability requirements as defined in the VCWWM and Ventura County Fire Code.

(b) Would the project:

1) substantially increase surface water consumptive use (demand) within a fully appropriated stream reach as designated by the State Water Resources Control Board or where unappropriated surface water is unavailable; or

2) by diverting or dewatering downstream reaches, resulting in an adverse impact to one or more of the beneficial uses listed in the Basin Plans?

The following outlines the process to be used in completing the Initial Study in consultation with PWA.

1. Review topographic maps, drainage studies, and other geographic resources to determine whether *surface water* resources occur on or near the project site. Describe where the project occurs in relationship to natural and artificial *surface water* bodies and the hydrologic relationship to those bodies.
2. Evaluate the project's impacts to any identified *surface waters*. Determine whether the project would substantially increase or decrease supply either individually or cumulatively, in these *surface waters*. Evaluate how this change in *surface water* flow would affect surface water beneficial uses for Ventura County as listed in the Water Quality Control Plan, as amended, for Los Angeles Region No. 4.

3. Evaluate the project's potential to substantially increase *surface water* consumptive use or demand. If the project utilizes *surface water* for construction or long-term operation, the source of the water must be disclosed and the potential use quantified.
4. Determine whether the *surface water* for the project would be from a fully appropriated stream reach as designated by the State Water Resources Control Board. Determine whether unappropriated *surface water* is available for the project.
5. If the water used for the project is from a municipal source, the source and supply of *surface water* from that municipal source must be disclosed and evaluated to determine whether the project would result in a substantial increase of *surface water* use. Evaluate and disclose the potential impacts of this increase in *surface water* use.
6. When determining cumulative impacts, obtain a list from the *Lead Agency* of past, present, and reasonably foreseeable probable future projects, including *adjacent* cities, if applicable, that are located within the vicinity of the project site, in order to assess the project's contribution to cumulative impacts on *surface water* supply.

(c) Would the project:

1) introduce physical development that would adversely affect the water supply of the groundwater basin and/or hydrogeologic unit in which the project is located; or

2) for a "water-demand project," have sufficient water supplies during normal, single-dry, and multiple-dry water years for a 20-year projection to serve the project?

Water supplied by the following sources shall be determined to constitute a permanent supply of water unless there is a special known adverse situation.

1. Cities, County Waterworks Districts, water districts, special districts, and other public entities; private water companies and mutual water companies.
2. Water from these entities shall constitute a permanent supply if, and only if, the supplier can furnish an approved *WAL* or Urban Water Management Plan[12] and indicates in writing it has a permanent supply for the project. The VCWWM requires an approved *WAL* report prior to issuance of any new water will-serve letters.
3. Calleguas Municipal Water District (MWD), Casitas MWD, and United Water Conservation District are considered wholesale water suppliers. Therefore, a water will-serve letter should be procured from the water retail service provider of Calleguas MWD, Casitas MWD, or United Water Conservation District in the project area. A water will-serve letter from Calleguas MWD, Casitas MWD, or United Water Conservation District will only be accepted under special circumstances.

[12] An Urban Water Management Plan is a plan that describes and evaluates an urban water supplier's source of supply, reasonable and practical efficient uses, reclamation and demand management activities, and other criteria as required in the California Water Code. An "urban water supplier" is a supplier, publicly or privately owned, that provides water for municipal purposes directly or indirectly to more than 3,000 customers, or supplies more than 3,000 acre-feet of water annually. An urban water supplier includes a supplier or contractor for water, regardless of the basis of right, which distributes or sells for ultimate resale to customers. In the case of *water purveyors* classified as urban water suppliers under the Urban Water Management Planning Act, a currently adopted Urban Water Management Plan that has been accepted by the State Department of Water Resources will satisfy the requirement to provide a *WAL*.

4. Groundwater from a well that meets one of the following criteria as described in the VCWWM, Section 2.12, Criteria for Demonstrating a Long-Term Domestic Groundwater Supply:

    a. A category 1 well for which a well pump and recovery test has been completed and the results successfully meet all requirements as described for a Category 1 Well Test (Section 2.12.3 of the VCWWM); or

    b. A category 2 well for which a study and report have been completed that meet all the requirements for a Category 2 Groundwater Supply Study and Report (Section 2.12.4 of the VCWWM).

Projects with water that is not supplied from one of the sources listed above shall be considered to have a potentially significant impact and further analysis shall be addressed in an EIR. Note that a spring does not meet the requirement for a permanent source of water supply.

"Water-demand projects" (as defined in State CEQA Guidelines Section 15155) shall, as part of the CEQA review process, demonstrate adequate water supply pursuant to Section 15155 of the State CEQA Guidelines. This may include, where applicable, preparation of a water assessment pursuant to Sections 10910 to 10915 of the Water Code to determine whether water supplies are available during normal, single-dry, and multiple-dry water years for a 20-year projection. The water supply assessment shall be prepared to the satisfaction of and approved by the governing body of the affected *public water system* and the *Lead Agency*.

In addition, consult with the *Lead Agency* regarding past, present, and reasonably foreseeable probable future projects that are located within the same *groundwater basin* and/or *hydrogeologic unit* as the project site in order to assess the project's contribution to cumulative impacts on water supply.

(d) Would the project:

1) conflict with applicable state or local requirements related to wastewater treatment and/or sewage collection/treatment, and result in a significant adverse environmental effect due to that conflict,

2) increase demand to a level that would exceed a wastewater/sewer service provider's capacity; or

3) require or result in the relocation or construction of new or expanded wastewater treatment or sewage facilities, the construction or relocation of which would cause significant environmental effects?

The following state and local regulations should be considered when evaluating the project as it relates to wastewater treatment and/or sewage collection/treatment:

- California Water Code
- California Code of Regulations, Title 22
- California Regional Water Quality Control Board *Basin Plans*
- Uniform California Plumbing Code
- Ventura County Building Code, Article 1 and 6

Onsite Wastewater Treatment Systems

Review the project and groundwater quality information (if available) to determine the following:

- Whether the project would require the installation of an *OWTS*.
- If the project would require the installation of an *OWTS*, whether septic system feasibility has been adequately demonstrated. This is accomplished by reviewing and evaluating soil engineering/percolation testing reports, proposed *OWTS* design, and other required information submitted with the project application.
- If an existing *OWTS* would be utilized, a septic tank inspection report dated no more than three years from the date of the discretionary application, system design information and other related materials shall be reviewed to determine whether the system is in good repair and is not posing any health hazards, and whether additional ministerial reviews will be required prior to use inauguration.

Sewage Collection/Treatment Facilities

Review the project and consult with the Regional Water Quality Control Board, where applicable, to obtain the following information:

- Determine whether the project requires connection to a public sewer.
- For projects with existing sewer service connections, a property tax statement or sewer utility bill shall be provided to confirm existing sewer service.
- If sewage disposal would be provided by a public sewer agency identified in the Wastewater Districts Map (Figure 7-1) and Wastewater Service Providers List (Table 7-1) in Section 7.1 of the Background Report, a sewer availability letter must be provided by the sewer agency. The letter shall include information to demonstrate that the sewer agency has sufficient sewer/treatment capacity to serve the project and other cumulative development.
- If sewage disposal would be provided by a permitted sewer facility not listed in the Wastewater Districts Map (Figure 7-1) and Wastewater Service Providers List (Table 7-1) in Section 7.1 of the Background Report, a sewer availability letter must be provided by the sewer facility. The letter shall include information to demonstrate that the sewer facility has sufficient sewer/treatment capacity to serve the project and other cumulative development. Additional information such as, but not limited to, soils engineering/percolation testing reports may be required for review and evaluation.
- If the project is proposing a new onsite sewage treatment facility either to service an area or to accommodate the proposed project, the applicant should provide information such as, but not limited to, soils engineering/percolation testing reports, detailed engineering plans of the treatment works, site plans of the collection system and treatment works, initial assessments and evaluations related to water quality and discharge requirements as appropriate, and other permitting and documentation as required by the Regional Water Quality Control Board and other agencies as appropriate, such as the California Public Utilities Commission.

The following guidance is provided to help complete the Initial Study Checklist.

A determination of **No Impact (N)** shall be made if one or more of the following applies to the project:

- The project would not utilize an *OWTS*, generate sewage, would not require a connection to public sewer, or no new sewage treatment facility is proposed; or
- The sewer agency whose service area includes the project has indicated that the facility has existing capacity to serve the project and cumulative development, and no improvements to existing facilities are required.

A determination of **Less than Significant Impact (LS)** shall be made if one or more of the following applies to the project:

- An *OWTS* would be utilized and the RMA Environmental Health Division has determined that sewage disposal feasibility has been demonstrated;
- The existing *OWTS* is operating properly and does not appear to be creating a potential health hazard;
- The project meets the requirements of the Local Agency Management Program for *OWTSs*, or if utilizing an *OWTS* but is exempt from these requirements;
- The new *OWTS*, if one is proposed, complies with applicable regulations as enforced by the RMA Environmental Health Division;
- A connection to a sewage treatment facility is required and the sewer agency whose service area includes the project has indicated that the facility has sufficient capacity when the project includes improvements to existing, or construction of new, sewer mains and/or facilities;
- The California Regional Water Quality Control Board requirements include improvements to existing facilities; or
- The new sewage treatment facility, if one is proposed, would operate in conformance with California Regional Water Quality Control Board requirements and the requirements of other agencies where applicable (e.g., California Public Utilities Commission).

Compliance with applicable regulations pertaining to *OWTS* and through adoption of specific project conditions would reduce any potential individual and cumulative *onsite wastewater treatment* impacts to a less than significant level. For projects seeking waivers from the Ventura County Sewer Policy or Plumbing Code to allow *OWTS* in lieu of sewage treatment or connections to a sewage treatment facility, consult with the RMA Environmental Health Division to determine the level of impact that may result from the project.

A determination of **Less than Significant Impact with Mitigation Incorporated (LS-M)** shall be made if one or more of the following applies to the project:

- The existing *OWTS* is substandard or has the potential to create a public health hazard. However, incorporation of mitigation measures would reduce the potential impact to a less than significant level;
- The sewer agency or California Regional Water Quality Control Board has indicated that the existing sewer facility does not have sufficient capacity to serve the project and cumulative development. However, incorporation of project conditions and mitigation measures required by the sewer agency or Regional Water Board would reduce the potential impact to a less than significant level; or

- The new sewage treatment facility, if one is proposed, would require incorporation of mitigation measures for improvements or modifications to the proposed facility as required by the California Regional Water Quality Control Board or other regulatory agencies.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an EIR if there is *substantial evidence* that one or more of the following applies to the project:

- Project-specific or cumulatively significant impacts from an *OWTS* cannot be feasibly mitigated to a less than significant level using currently available information;
- The project may individually or cumulatively generate sewage effluent which would exceed the capacity of an existing facility or ancillary facilities;
- The project would result in a determination by the wastewater treatment or sewer service provider, which serves or may serve the project, that the provider would not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; or
- The new sewage treatment facility, if one is proposed, would conflict with California Regional Water Quality Control Board requirements or the requirements of other regulatory agencies (e.g., California Public Utilities Commission), and would result in a significant environmental impact due to that conflict.

(e) Would the project:

1) conflict with applicable state or local regulations related to solid waste, including generating solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure that would reduce the local infrastructure's useful life to less than 15 years, or otherwise impair the attainment of solid waste reduction goals; and

2) result in a significant adverse environmental effect due to that conflict?

The following state and local regulations should be considered when evaluating the project as it relates to solid waste:

- California Health and Safety Code, Division 104, Part 13, Chapter 4, Article 7
- California Health and Safety Code, Division 104, Part 14
- California Code of Regulations, Title 14, Division 7
- California Code of Regulations, Title 27, Division 2
- California Public Resources Code, Division 30
- California Regional Water Quality Control Board *Basin Plans*
- Ventura County Ordinance Code, Division 4, Chapter 7

Because available disposal capacity is ever-changing, any project generating solid waste should be referred to the Integrated Waste Management Division for project specific review.

Review the project application, description and requested materials, and consult with the RMA Environmental Health Division to determine whether the project would involve a solid waste operation subject to solid waste regulation.

The following guidance is provided to help complete the Initial Study Checklist.

A determination of **No Impact (N)** shall be made when the project does not generate solid waste.

A determination of **Less than Significant Impact (LS)** shall be made when the project does not generate solid waste in excess of state or local standards; does not generate solid waste in excess of the capacity of local infrastructure that would reduce the local infrastructure's useful life to less than 15 years; does not otherwise impair the attainment of solid waste reduction goals; or is a solid waste operation or facility that complies with state regulations enforced by the *Local Enforcement Agency*/RMA Environmental Health Division. Compliance with applicable state regulations enforced by the *Local Enforcement Agency*/RMA Environmental Health Division would reduce potential individual and cumulative impacts to a less than significant level.

A determination of **Less than Significant Impact with Mitigation Incorporated (LS-M)** shall be made when the project has the potential to cause a significant impact. However, the project can be mitigated to a less than significant level by project design or measures using currently acceptable technology and/or through adoption of specific project conditions.

A determination of **Potentially Significant Impact (PS)** shall be made, and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would conflict with solid waste regulations and would result in a significant environmental impact due to that conflict.

(f) Would the project cause a substantial disruption or re-routing of an existing utility facility, or substantially increase demand to a level that would require or result in the relocation or construction of new or expanded water, storm water drainage, electric power, natural gas, telecommunications, or other types of utility facilities, which would cause significant environmental effects?

The project applicant shall identify the utilities that are in proximity to and would serve the project.

Water

Refer to the analyses conducted for Initial Study Checklist questions 24(a) through 24(c) to determine whether the project would cause a substantial disruption or necessitate re-routing of existing water facilities or infrastructure or increase demand to a level that would require or result in the relocation or construction of new or expanded water facilities. Determinations of **No Impact (N)** and **Less than Significant Impact (LS)** shall be made consistent with analyses in questions 24(a) through 24(c), where applicable. The project may have the potential to cause a significant impact if it would cause a substantial disruption or necessitate re-routing of existing water facilities or infrastructure or require or result in the relocation or construction of new or expanded water facilities.

Stormwater Drainage

A determination of **No Impact (N)** shall be made for projects that do not require stormwater drainage. A determination of **Less than Significant Impact (LS)** shall be made when the project design integrates stormwater drainage in compliance with applicable state and local regulations. If the project cannot comply with applicable state and local regulations, consult with the PWA to evaluate the project for any potentially significant impacts.

Electricity

A determination of **No Impact (N)** shall be made if the project is already served by existing electrical facilities. A determination of **Less than Significant Impact (LS)** shall be made when the project is

not currently served with electricity but is in an area that is currently served by existing electrical facilities. If new, aboveground transmission lines of 66 kV or greater are required, the project should be expanded to include these facilities, and the facilities shall be evaluated for any potential significant environmental impacts (e.g., scenic resources) and whether such impacts, if any, could be mitigated to a less than significant level.

Natural Gas

A determination of **No Impact (N)** shall be made when the project would not use natural gas. A determination of **Less than Significant Impact (LS)** shall be made when the project would use natural gas and there are existing natural gas transmission facilities in the immediate area.

If the project would use natural gas and there are no natural gas facilities in the immediate area, the project applicant shall determine how the project could connect to these facilities to serve the project. The extension of gas service facilities must be made part of the project (if not already included) and shall be evaluated accordingly for any potentially significant impacts.

Communication Facilities (cellular, telephone, cable)

The *Lead Agency* shall determine whether the project should be referred to the Ventura County Information Technology Services, Network Services Division for further evaluation. If consulted, the Network Services Division shall determine whether further study or design work is required and determine whether the project will have the potential to result in any significant impacts. In addition, the *Lead Agency* shall consult with any applicable military base within the county regarding the project's use of radio frequencies to ensure the project does not impede military wireless or radio communications. If the project would use radio frequencies intended for emergency communication, then the project may interfere with, and result in an adverse impact on, emergency communication facilities.

(g) Would the project substantially interfere with, or compromise the integrity, or affect the operation of an existing pipeline that is currently in operation?

The *Lead Agency* shall review the Oil and Gas Pipeline data layer on the Ventura County *Resource Management Agency Geographic Information System Viewer* to determine whether the project would be located over a pipeline facility or route. The Oil and Gas Pipeline data layer may not be released to the public in accordance with the directions of the Federal Office of Homeland Security.

If the project is located over a pipeline facility, contact the appropriate facility owner to discuss the project and determine the potential project impact on the pipeline facility, as well as any measures to mitigate potentially significant impacts, if necessary.

25.4 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website

Source	Managing Agency/Organization	Online Access
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
Central Valley Project	US Bureau of Reclamation	Website
Countywide Integrated Waste Management Plan	CalRecycle	Website
Ventura County General Plan Background Report, Chapter 7	Ventura County RMA Planning Division	PDF | Website
Ventura County General Plan Background Report, Chapter 10	Ventura County RMA Planning Division	PDF | Website
Ventura County Water and Sanitation Districts	Ventura County Public Works Agency (PWA)	Website
Ventura County RMA Geographic Information Systems Viewer	Ventura County Information Technology Services	Website

26. Transportation

26.1 BACKGROUND AND CONTEXT

Systems of transportation and circulation include facilities for pedestrians and bicycles, *public transit*, roadways, railroads, and airports. Pedestrian and bicycle facilities include, but are not limited to sidewalks, bike lanes, bike paths, crosswalks, bike lockers, pedestrian lighting, flashing beacons, and protected highway and/or railroad crossings. Refer to Section 19, Aviation Hazards, of the Initial Study Assessment Guidelines for thresholds of significance and guidance for analyzing project impacts related to airports.

The safety and design of roadways is the physical configuration of existing and future roads or highways (e.g., width, curve radius, gradient, and ability to support the weight of fire apparatus). Tactical access is an organized system of roads/access to and from a project site used during an emergency or disaster. California Code of Regulations Title 14, Division 1.5, Chapter 7 Fire Protection, Subchapter 2, Articles 1-3 ("State Fire Safe Regulations") and Ventura County Fire Protection District (VCFPD) Access Standards apply to the safety, design, and tactical access for all public roads and private roads.

County maintained roads are designed to provide for the needs of roadway users while maintaining the integrity of the environment. County maintained roads are defined as those roads accepted into the County road system by action of the Board of Supervisors in accordance with Section 941 of the California Streets and Highways Code. The Ventura County Road Standards ("Road Standards"), as maintained by the Public Works Agency (PWA) and adopted by the Board of Supervisors, establish uniform policies and procedures for the design and construction of County maintained roads and appurtenances.

Many existing roads in the County do not comply with current County Road Standards, State Fire Safe Regulations, or VCFPD Access Standards because many existing roads were built prior to the existence of modern road standards and were often simply "farm to market" roads or rural access roads (often in remote, mountainous, or otherwise rugged areas), intended for limited traffic. The fact that existing roads do not comply with current Road Standards, State Fire Safe Regulations, or VCFPD Access Standards does not imply that those roads are unsafe, nor does it mandate the initiation of improvement projects. However, new development can place an additional burden on such roads and create expectations of increased vehicle trips or municipal levels of services. The impacts from development on existing roads should be evaluated in the context of the most current regulations and guidance available, as well as and engineering knowledge, experience, and judgment.

26.1.1 Vehicle Miles Traveled

Vehicle miles traveled (VMT) refers to the amount and distance of automobile travel attributable to a project. The *VMT* metric integrates land use and multimodal transportation choices, encourages alternative transportation, greater efficiency, and reduced greenhouse gas (GHG) emissions. The *VMT* metric was established by the Governor's Office of Land Use and Climate Innovation (LCI), formerly known as the Office of Planning and Research as an alternative to vehicle delay as a new

methodology for evaluating transportation impacts under the California Environmental Quality Act (CEQA) following the State Legislature's passage of Senate Bill (SB) 743, codified in Public Resources Code Section 21099. *VMT* analysis in CEQA Guidelines Section 15064.3 became effective statewide on July 1, 2020.

26.2 VMT SCREENING CRITERIA

VMT measures the amount of travel for all vehicles in a geographic region over a given period of time, typically a one-year period. The term "vehicle" typically refers to on-road passenger vehicles, specifically cars and light trucks. However, special consideration of other vehicle types (e.g., heavy duty trucks) may be warranted for certain projects as determined by the Ventura County Road Commissioner during review of the project and for incorporation into the *Traffic Impact Study*, if required. Regardless, for an appropriate comparison, vehicle types considered should be consistent across project assessment, significance thresholds, and mitigation.

The Southern California Association of Governments (SCAG) updates its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) every four years as required by federal and state regulations. The RTP/SCS provides for the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area. The RTP is integrated with the development of a SCS, which encompasses a holistic approach to programs and strategies that leverage existing infrastructure to serve infill development, repurpose underutilized properties, and reduce greenhouse gas emissions. Projects that are consistent with the core vision and goals of the adopted RTP/SCS and meet the applicable screening criteria below are considered to have a less than significant impact, and no further analysis is required upon approval of the screening criteria determination by PWA. The screening criteria below incorporates guidance contained within LCI's Technical Advisory on Evaluating Transportation Impacts in CEQA ("LCI Technical Advisory"), December 2018, as may be amended and updated.

If a project does not meet at least one of the *VMT* screening criteria stated in Section 26.2.1 and 26.2.2, *VMT* analysis shall be required to determine the significance of *VMT* impacts in accordance with Threshold TRA-1. *VMT* analysis must use the methodology in Section 26.4. The determination of significance must be conducted by a registered civil or traffic engineer in the State of California familiar with Ventura County and who is qualified to perform traffic engineering studies. Such studies must utilize methodology identified in Section 26.4 and be provided to the *Lead Agency* for review and acceptance.

26.2.1 Screening Criteria for Land Use Projects

The *Ventura County Transportation Model (VCTM)* currently divides Ventura County into 663 unique *traffic analysis zones (TAZs)*. Similar types of development within *TAZs* can generally be expected to generate *VMT* metrics in line with the baseline metrics. The *TAZs* can therefore be utilized to screen projects unless the development has unique land uses or operating characteristics significantly different from existing development within the *TAZ*. Ventura County utilizes a Countywide VMT Screening Evaluation Tool to assist in determining whether a project is screened for residential, office, and industrial land use types. A proposed land use project is presumed to have a less than significant impact on *VMT* if the project meets any of the following screening criteria:

a. Generates or attracts fewer than 110 net vehicle *average daily trips*. "Average daily trips" mean the total bi-directional volume of traffic passing through a given point during a given time period, divided by the number of days in that time period;

b. Includes 100 percent *affordable housing* residential development associated with infill development (i.e., development of unused or underutilized land within areas that are already largely developed). If a project contains *affordable housing* along with other land uses, the non-*affordable housing* uses need to meet at least one of the other screening criteria presented in this section to avoid the need for further *VMT* analysis;

c. Includes mixed-use development with a residential housing component of 100 percent *affordable housing* and is associated with infill development;

d. Is a "local serving retail" project (for purposes of *VMT* analysis, a "local serving retail" project consists of a retail business with a combined gross floor area of less than 50,000 square feet);

e. Is a residential, retail, office, or mixed-use project located within a half mile of a *Transit Priority Area* as defined in PRC Section 21099 or a transit stop along a "high-quality transit corridor" as defined in PRC Section 21155, and has a floor area ratio of 0.75 or more; or

f. Is located within a *low VMT area* designated for residential, office, or industrial uses in the General Plan and incorporates features (i.e., density, mix of uses, transit accessibility) consistent with existing land uses within the area. For purposes of *VMT* analysis, a low *VMT* area is a *TAZ* with the applicable development *VMT* metric at least 15 percent below the regional (unincorporated area) average as modeled by the *VCTM*.

26.2.2 Screening Criteria for Transportation/Roadway Improvement Projects

CEQA Guidelines Section 15064.3(b)(2) states that transportation projects that reduce or have no impact on *VMT* should be presumed to have a less than significant transportation impact. Furthermore, LCI's Technical Advisory indicates that transportation projects that promote active transportation, such as transit, bicycle, and pedestrian facilities, are presumed to reduce *VMT* and can be screened from further analysis. Projects that improve safety or traffic operations at current bottlenecks, such as installing a new traffic signal or widening an intersection to provide new turn lanes, are not expected to increase *VMT*. Reducing roadway capacity (for example, by removing or repurposing motor vehicle travel lanes) will generally reduce *VMT* and therefore is presumed to cause a less than significant impact on transportation. Based on the foregoing, the following transportation projects listed in the LCI Technical Advisory are not likely to lead to a substantial or measurable increase in *VMT* and are not subject to further *VMT* analysis:

a. Rehabilitation, maintenance, replacement, safety, and repair projects that do not add additional motor vehicle capacity and are designed to improve the condition of existing transportation assets (e.g., highways; roadways; bridges; culverts; tunnels; transit systems; and transportation management system (TMS) field elements such as cameras, message signs, and signals; and assets that serve bicycle and pedestrian facilities).

b. Roadside safety devices or hardware installation such as median barriers and guardrails.

c. Roadway shoulder enhancements to provide "breakdown space," dedicated space for use only by transit vehicles to provide bicycle access or to otherwise improve safety, but which will not be used as automobile vehicle travel lanes.

d. Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety.

e. Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, two-way left turn lanes, or emergency breakdown lanes that are not utilized as through lanes.

f. Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit.

g. Conversion of existing general-purpose lanes (including ramps) to managed lanes or transit lanes or changing lane management in a manner that would not substantially increase vehicle travel.

h. Addition of a new lane that is permanently restricted to use only by transit vehicles.

i. Reduction in the number of through vehicle lanes (e.g. "road diet") to accommodate facilities for pedestrians, cyclists, and *transit use* within the right-of way.

j. Differences in grade elevations to separate vehicles from rail, transit, pedestrians, or bicycles, or to replace a lane in order to separate preferential vehicles from general vehicles. Examples of preferential vehicles may include trucks or high occupancy vehicles, which are motor vehicles carrying more than a specified minimum number of people and are therefore permitted to use a traffic lane reserved for such vehicles (i.e., high-occupancy toll lane).

k. Installation, removal, or reconfiguration of traffic control devices, including transit signal priority features to improve the phasing and control of traffic at stoplights.

l. Installation of traffic metering systems, detection systems, cameras, changeable message and other electronics designed to optimize vehicle, bicycle, or pedestrian flow.

m. Timing of signals to optimize vehicle, bicycle, or pedestrian flow.

n. Installation of roundabouts or traffic circles.

o. Installation or reconfiguration of traffic calming devices.

p. Addition of tolled lanes, where tolls are sufficient to mitigate *VMT* increase.

q. Initiation of new transit service.

r. Conversion of streets from one-way to two-way operation with no net increase in the number of traffic lanes.

s. Removal or relocation of off-street or on-street parking spaces.

t. Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs).

u. Addition of traffic wayfinding signage.

v. Rehabilitation and maintenance projects that do not add motor vehicle capacity.

w. Addition of new or enhanced bike or pedestrian facilities on existing streets/highways or existing public rights-of-way.

x. Addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel.

y. Installation of publicly available alternative fuel/charging infrastructure.

z. Addition of passing lanes, truck climbing lanes, or truck brake-check lanes in rural areas that do not increase overall vehicle capacity along the corridor.

26.3 THRESHOLDS OF SIGNIFICANCE

The determination of significance shall be made on a case-by-case basis and evaluated using the following thresholds of significance as specified below.

TRA-1 If a project does not meet the screening criteria identified in Section 26.2, the following *VMT* significance thresholds shall be used to evaluate a project's potential *VMT* impact, as applicable.

a. Residential Uses: A project involving residential uses may have a significant impact if it would exceed a *VMT* per capita threshold of 15 percent below baseline *VMT* per capita levels.

b. Office and Industrial Uses: A project involving office or industrial uses may have a significant impact if it would exceed a *VMT* per employee threshold of 15 percent below baseline *VMT* per employee levels.

c. Retail Uses: A project involving regional serving retail may have a significant impact if it would result in a net increase in total *VMT* based on model data found in the *VCTM*.

d. Mixed Uses: A project that includes a combination of residential, retail, and/or office uses may have a significant impact if any of the uses included in the project would exceed a *VMT* threshold of 15 percent below baseline *VMT* per capita or *VMT* per employee levels.

e. Agricultural Uses: A project that involving agricultural uses may have a significant impact if it would result in a net increase in regional (unincorporated area) total *VMT* based on model data found in the *VCTM*.

f. Roadway Improvement Projects: A project involving roadway improvements may have a significant impact if it would result in a net increase in total *VMT* based on model data found in the *VCTM*.

TRA-2 A project may have a significant impact if it would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

TRA-3 A project may have a significant impact if it would a) conflict with the VCFPD Access Ordinance, Ventura County Road Standards, and/or State Fire Safe Regulations addressing the circulation system, including *public transit*, roadway, bicycle, or pedestrian facilities; and b) result in a significant adverse environmental effect due to that conflict.

TRA-4 A project may have a significant impact on the circulation system, including *public transit*, pedestrian, or bicycle facilities if it would result in substantial adverse physical barriers to such facilities, substantially increase demand in the use of such facilities, or substantially decrease the performance or safety of such facilities.

TRA-5 A project may have a significant impact if it would result in a substantial adverse physical interference with an existing railroad's facilities or operations.

26.3-6 A project may have a significant impact if it would result in inadequate emergency access.

26.4 IMPACT ANALYSIS

Guidance on addressing the questions from the Initial Study Checklist is provided below. In order to determine whether project impacts exceed or meet the criteria of the thresholds of significance in Section 26.3, the level of impact shall be evaluated based on the appropriate assessment methodologies as outlined below, which may require the preparation of a *Traffic Impact Study*. Prior to preparation of the *Traffic Impact Study*, a scope of work must be submitted as part of the discretionary permit application and routed to PWA for review and acceptance. If required, the project applicant shall retain an engineer to prepare, sign, and stamp a *Traffic Impact Study*.

(a) Would the project exceed the VMT thresholds as established in the ISAGs pursuant to CEQA Guidelines section 15064.3(b)?

The *VMT* analysis must be performed by a civil engineer or traffic engineer registered in the State of California who is qualified to perform traffic engineering studies and is familiar with Ventura County.

The County relies on the *VCTM* in its transportation analysis and planning activities. The *VCTM* should be utilized where modeling is required to prepare *VMT* analysis for the project. A full copy of the traffic model, documentation, request form, and usage agreement are available online (see section 26.5). The County regional average baseline *VMT* levels are established using the latest publicly released VCTC Base Year *VCTM* report. An engineer may revise model estimates to reflect professional judgment based on *substantial evidence*. Any assumptions used to estimate *VMT* and any revisions to model outputs must be approved in advance by PWA and documented and explained in the *Traffic Impact Study*.

Consider the following additional factors, if applicable to the project:

- Retail projects attract a variety of trip types (e.g. home-based and non-home-based trips). The addition of new retail uses in urban areas may improve destination proximity with local retail uses, often shortening trips and as a result, reduce *VMT*. New retail development may also redistribute shopping trips rather than create new trips, so estimating the change in total *VMT* is the most appropriate way to determine the project's impacts. This can be determined by analyzing the project in the *VCTM* and comparing it to the model data.
- For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a *Lead Agency* may tier from that analysis as provided in CEQA Section 15152. If a project would lead to an increase in vehicular travel, an analysis shall be undertaken to determine the amount of vehicle travel induced by the project.

Cumulative analysis involves evaluation of past, present, and reasonably foreseeable probable future projects regarding land use development and the transportation network. Land use development and infrastructure projects consistent with Policies CTM-1.1 and CTM-1.2 of the General Plan may rely on cumulative traffic analysis and conclusions from the General Plan Environmental Impact Report (EIR) and its applicable mitigation measures.

Where a *VMT* analysis finds that a project would exceed the applicable significance threshold(s) stated in Section 26.3, potential mitigation measures to reduce *VMT* must be evaluated and, where appropriate, incorporated into the project. Potential *VMT* reduction measures include, but are not limited to:

All Land Uses:

- Improving or increasing access to transit.
- Increasing access to common goods and services (e.g., groceries, daycare).
- Incorporating neighborhood electric vehicle network.
- Orienting the project design toward transit, bicycle and pedestrian facilities.
- Improving pedestrian or bicycle networks, or transit service.
- Providing bicycle parking.
- Implementing or providing access to a commute reduction program.
- Providing car-sharing, bike sharing, and ride-sharing programs.
- Providing transit passes.

Work-Based Land Uses:

- Shifting single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services
- Providing incentives or subsidies that increase the use of mobility modes other than single occupancy vehicle.
- Providing on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms.
- Providing a guaranteed ride home service to users of non-auto modes.

Where *VMT* reduction measures are proposed, *VMT* calculations shall include the effect of all measures and tentative scheduled timing of each proposed mitigation measure. The amount of reduction in *VMT* attributable to the mitigation measures must be fully documented and justified based on *substantial evidence*. Appropriate language and/or exhibits establishing the effectiveness of each mitigation measure must be provided, such as the California Air Pollution Control Officers Association's "Quantifying Greenhouse Gas Mitigation Measures." Multiple mitigation measures may be additive only to an extent. When mitigation measures affect similar demographic groups, their combined effectiveness may be limited due to redundancy.

The best available data on travel demand management effectiveness can be found in the "Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity," as may be amended and updated, which was unanimously adopted by the California Air Pollution Control Officers Association Board of Directors.

A monitoring plan will be required for any VMT mitigation measure established for the project. Monitoring will occur for a term no less than three years and no more than five years.

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

In addition to evaluating the project's design features as it relates to the circulation system, consider whether the project would result in any of the following conditions:

- Impact to an intersection that includes at least one leg that is part of a County maintained road, so that the intersection would exceed any one of the traffic signal warrants established by the California Manual for Uniform Traffic Control Devices (CAMUTCD), and if necessary, the installation of the traffic control device(s).
- Impact to any un-signalized intersection on the County maintained road system if the project would result in any of the warrants established by the CAMUTCD.
- Use of existing substandard public roads and whether such use would impact the operational safety of the County maintained road system within the vicinity of the project.
- Impact on existing County maintained roads and/or intersections, as well as pedestrian and bicycle facilities within the vicinity. Special consideration should be given to Substandard Impact Areas (see Appendix 23B).
- Potential roadway hazards to County maintained roads[13] or intersections, for example, due to the addition of traffic or proximity of a driveway.

Should the project's design features result in any of the above conditions, consult with the PWA or VCFPD, as appropriate, to determine the level of impact and identify mitigation measures, if necessary. A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made if a project is deemed to have a significant impact, but mitigation measures will be incorporated into the project to reduce the impact to a less than significant level. A determination of **Potentially Significant Impact (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would result in potentially significant impacts.

(c) Would the project a) conflict with the VCFPD Access Ordinance, Ventura County Road Standards, and/or State Fire Safe Regulations addressing the circulation system, including public transit, roadway, bicycle, or pedestrian facilities; and b) result in a significant adverse environmental effect due to that conflict?

The VCFPD shall review the project description materials (site plan, grading plan, etc.) and if necessary, make a visit to the project site. Items of design review include, but are not limited to road width, grades, vertical clearance, turning radius, turnouts, turnarounds, surface, bridges and other culvert crossings, and other obstructions.

Determine whether the proposed road is consistent with the VCFPD Access Ordinance and State Fire Safe Regulations. The VCFPD Access Ordinance is applicable to both public and private roads serving new development, including new buildings, expansion of existing building(s), and subdivisions of land. State Fire Safe Regulations are applicable to all roads for projects located within a State mapped *Fire Hazard Severity Zone (FHSZ)*. Ventura County Road Standards are normally applicable to public roads. In case of conflict between VCFPD Access Ordinance, Ventura County Road Standards, and State Fire Safe Regulations, the most restrictive requirement shall prevail.

[13] County maintained roads include both road segments or linear sections of a road or street and any intersections within the length of the County maintained road being analyzed. For purposes of this section only, a road segment is a portion of a County maintained road being analyzed in relation to a proposed action subject to CEQA.

The following information shall be used to determine the level of impact for the safety and design of access roads:

A determination of **No Impact (N)** shall be made if there are no new roads proposed, and all roads comply with the County Road Standards, VCFPD Access Ordinance, and State Fire Safe Regulations.

A determination of **Less than Significant Impact (LS)** shall be made if:

- Existing or proposed roads meet the applicable requirements of the County Road Standards and/or VCFPD Access Ordinance, and State Fire Safe Regulations; or use of alternate access standard is proposed.
- Existing or proposed roads are using the exceptions for secondary access under the provisions of the VCFPD Access Ordinance, and State Fire Safe Regulations.
- Reasonable safety measures as approved by the VCFPD shall be incorporated in the project design to offset the areas where full access requirements cannot be provided due to site-specific conditions or constraints.

A determination of **Less Than Significant Impact with Mitigation Incorporated (LS-M)** shall be made if existing or proposed roads do not meet the full requirements of the County Road Standards, VCFPD Access Ordinance, and/or State Fire Safe Regulations. The project shall be required to provide a *Fire Protection Plan* from a qualified fire protection consultant as approved by the VCFPD. The *Fire Protection Plan* shall identify mitigation measures to reduce the impact to a less than significant level. Proposed mitigation measures shall be approved by the VCFPD and PWA.

A determination of **Potentially Significant Impact (PS)** shall be made and further analysis shall be addressed in an EIR if there is *substantial evidence* that the project would result in potentially significant impacts.

(d) Would the project result in substantial adverse physical barriers to the circulation system, including public transit, pedestrian, or bicycle facilities, substantially increase demand in the use of such facilities, or substantially decrease the performance or safety of such facilities?

Public Transit Facilities

A public transit facility is defined in Government Code Section 65852.2(j)(11), as may be amended, which states: A location, including, but not limited to, a bus stop or train station, where the public may access buses, trains, subways, and other forms of transportation that charge set fares, run on fixed routes, and are available to the public. To determine whether a project would result in substantial interference or substantial increase in demand for additional bus transit facilities or services, the *Lead Agency* shall consult with the appropriate transit authority (see Figure 6-8 and Table 6-17 in Section 6.4 of the Ventura County General Plan Background Report). The *Lead Agency*, in consultation with the appropriate transit authority, shall determine whether the project would conflict with the transit authority's adopted policies, plans, or programs regarding public transit facilities or otherwise decrease the performance or safety of such facilities, and if so, the types of new operations or facilities that would be required to address the conflict. A project may have the potential to cause a significant impact if it would result in a substantial change in operations and/or the construction of new facilities which would result in an adverse, physical impact to the environment. Consult with the appropriate transit authority to determine the level of impact.

Projects that can be expected to generate more than 100 daily vehicle trips (10 single family housing units or equivalent traffic generation) shall provide an evaluation of the specific project impacts through either consultation with the appropriate transit service provider or a separate analysis performed by the applicant and approved by PWA. Historically, transit ridership has been less than 10 percent of all traffic generated within Ventura County. This equates to a maximum anticipated ridership from the individual development of 10 daily riders or approximately 1 bus rider per peak hour period.

Pedestrian and Bicycle Facilities

PWA shall evaluate the impact on pedestrian and bicycle facilities that are or would be located within public rights-of-way, as well as demand for expanded pedestrian and bicycle facilities, including both existing facilities and planned facilities. Typically, this involves pedestrian and bike routes to and from schools, commercial centers and transit stops. A project may have the potential to cause a significant impact if it would generate or attract pedestrian and/or bicycle traffic volumes that require new protected highway crossings or new pedestrian and bicycle facilities (e.g., pedestrian overcrossings, traffic signals, and bikeways), the construction and/or use of which would result in an adverse, physical impact to the environment. Consult with PWA to determine the level of impact.

(e) Would the project result in a substantial adverse physical interference with an existing railroad's facilities or operations?

Review the project description and consult Figure 6-8 in Section 6.4, as well as Section 6.5 of the Ventura County General Plan Background Report for additional railroad information.

To determine whether a project would significantly impact rail facilities and services, the *Lead Agency* shall consult with the Union Pacific Transportation Company, the Southern California Regional Rail Authority, California Public Utilities Commission Rail Crossings and Engineering Branch (Rail Safety Division), and the VCTC.

(f) Would the project result in inadequate emergency access?

The VCFPD shall review the project description materials (site plan, grading plan, etc.) and if necessary, make a visit to the project site to determine the project's consistency with the VCFPD Access Ordinance, Ventura County Road Standards, and State Fire Safe Regulations. Items of design review include, but are not limited to road width, grades, vertical clearance, turning radius, turnouts, turnarounds, surface materials, bridges, culvert crossings, and other obstructions.

The VCFPD Access Ordinance is applicable to both public and private roads serving new development, including new buildings, expansion of existing building(s), and subdivisions of land. State Fire Safe Regulations are applicable to all roads for projects located within a State designated *FHSZ*. Ventura County Road Standards are normally applicable to public roads. In case of conflict between VCFPD Access Ordinance, Ventura County Road Standards, and State Fire Safe Regulations, the most restrictive requirement will prevail.

Should a project be served by a single dead-end access road that exceeds the allowable distance limits as established in the most recent VCFPD Access Ordinance and State Fire Safe Regulations, consult with VCFPD to determine the level of impact and mitigation measures, as appropriate, to potentially reduce potential impacts to a less than significant level.

26.5 RESOURCES & REFERENCES

Source	Managing Agency/Organization	Online Access
Resources		
Ventura County CEQA Implementation Manual	Ventura County Resource Management Agency (RMA) Planning Division	PDF | Website
Ventura County Initial Study Assessment Guidelines, Introduction	Ventura County RMA Planning Division	PDF | Website
Ventura County Initial Study Checklist Template	Ventura County RMA Planning Division	PDF | Website
References		
A Policy on Geometric Design of Highways and Streets	The American Association of State Highway and Transportation Officials (AASHTO)	Website
Access Ordinance Number 29	Ventura County Fire Department	PDF | Website
California Code of Regulations (CCR) Title 14, Division 1.5, Chapter 7 Fire Protection, Subchapter 2, Articles 1-3: Fire Safe Regulations. ("State Fire Safe Regulations")	Thomson Reuters Westlaw	Website
California Environmental Quality Act	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	Website
The California Manual of Uniform Traffic Control Devices (CAMUTCD)	California Department of Transportation	Website
California Streets and Highways Code	State of California	Website
Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity	California Air Pollution Control Officers Association	Website
Highway Design Manual (HDM)	Division of Design, California State Department of Transportation (Caltrans)	Website
Regional Transportation Plan/Sustainable Communities Strategy	Southern California Association of Government's (SCAG)	PDF | Website
State Designated Fire Hazard Severity Zones	Office of the State Fire Marshal	Website
Technical Advisory on Evaluating Transportation Impacts in CEQA	California Governor's Office of Land Use and Climate Innovation, formerly Office of Planning and Research	PDF | Website
Ventura Countywide VMT Screening Evaluation Tool	County of Ventura	Website

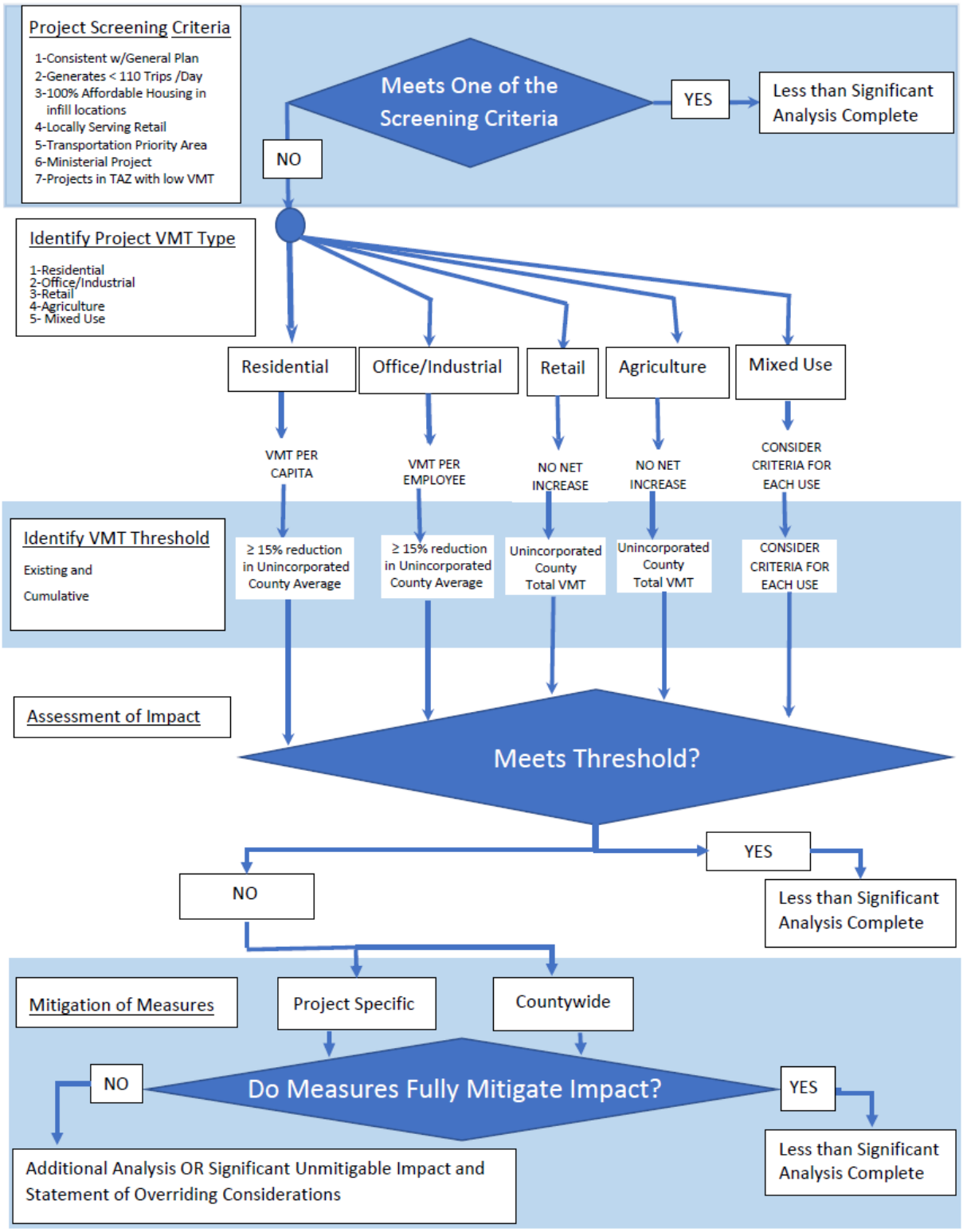
Source	Managing Agency/Organization	Online Access
Ventura County General Plan Background Report, Chapter 6	Ventura County RMA Planning Division	PDF | Website
Ventura County Road Standards	Ventura County Public Works Agency	PDF | Website
Ventura County Traffic Model (VCTM)	Ventura County Transportation Commission	Website

APPENDIX 26A

VMT Analysis Process for Land Use Projects

See Figure 26-1 for a summary flow chart of the *VMT* analysis process.

Figure 26-1. VMT Analysis Process for Land Use Projects



APPENDIX 26B

Substandard Impact Areas

The following figures depict the substandard impact areas within Ventura County.

Figure 26-2. Substandard Impact Areas Vicinity Map

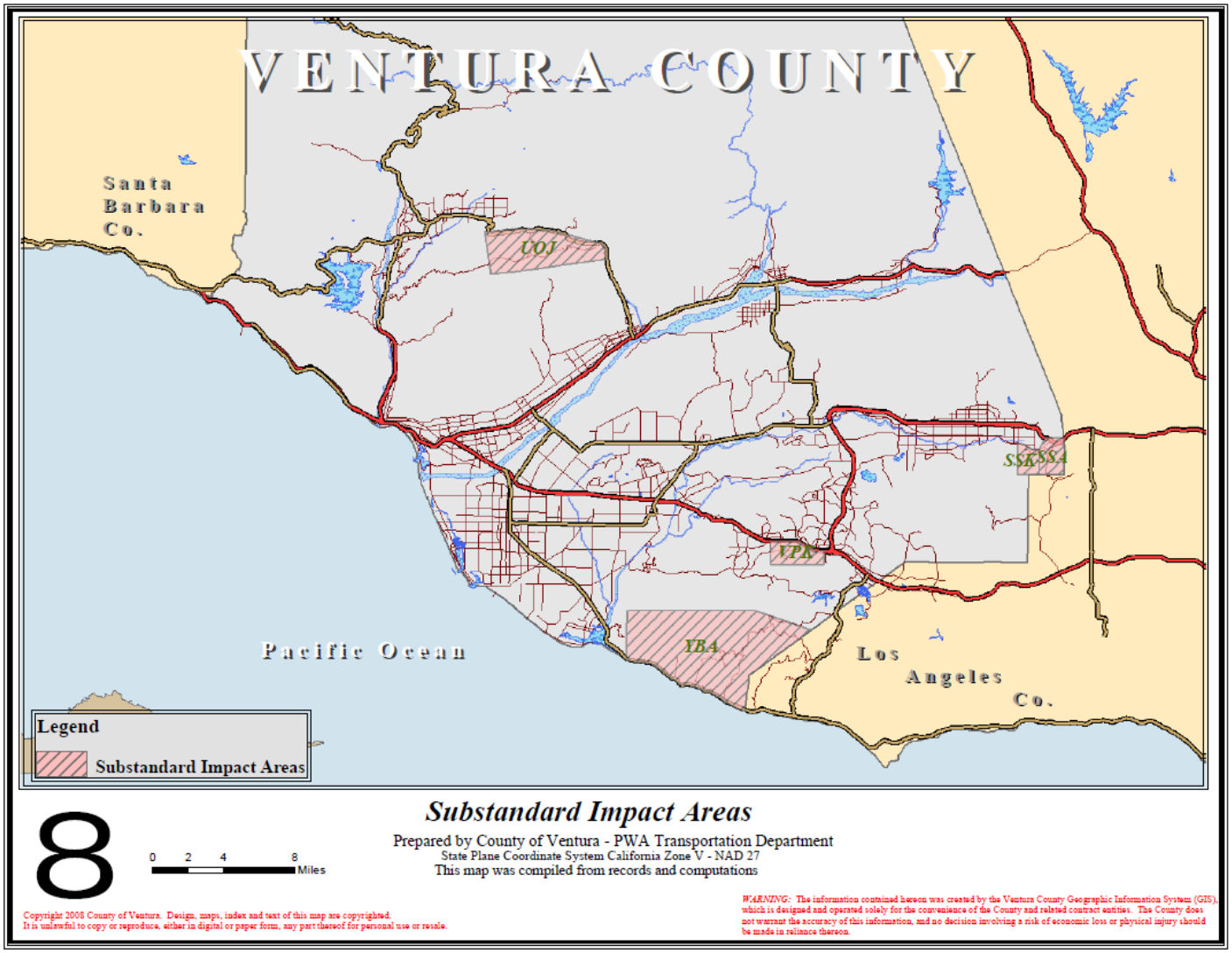


Figure 26-3. Upper Ojai Substandard Impact Area Map

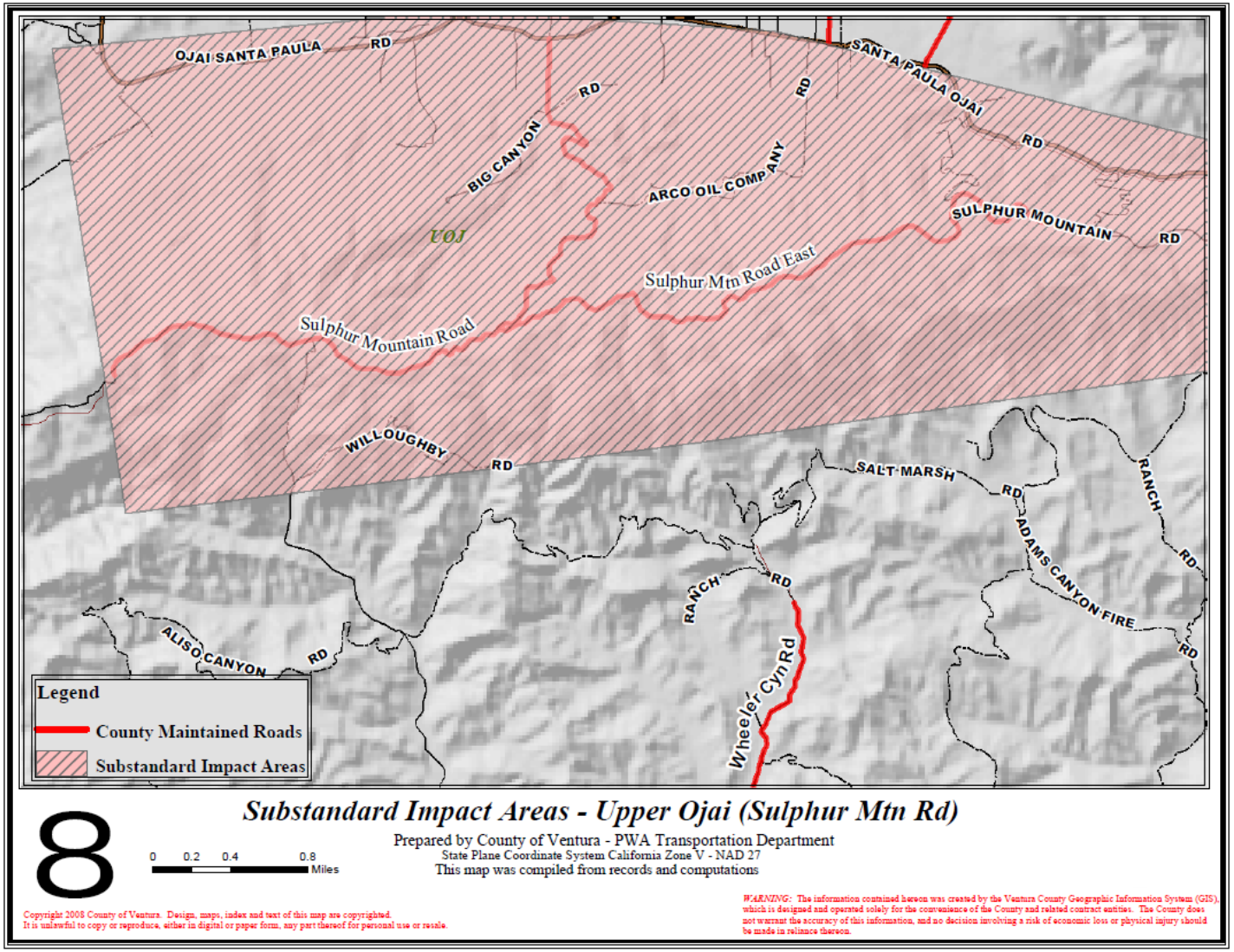


Figure 26-4. Santa Susana Area Substandard Impact Area Map

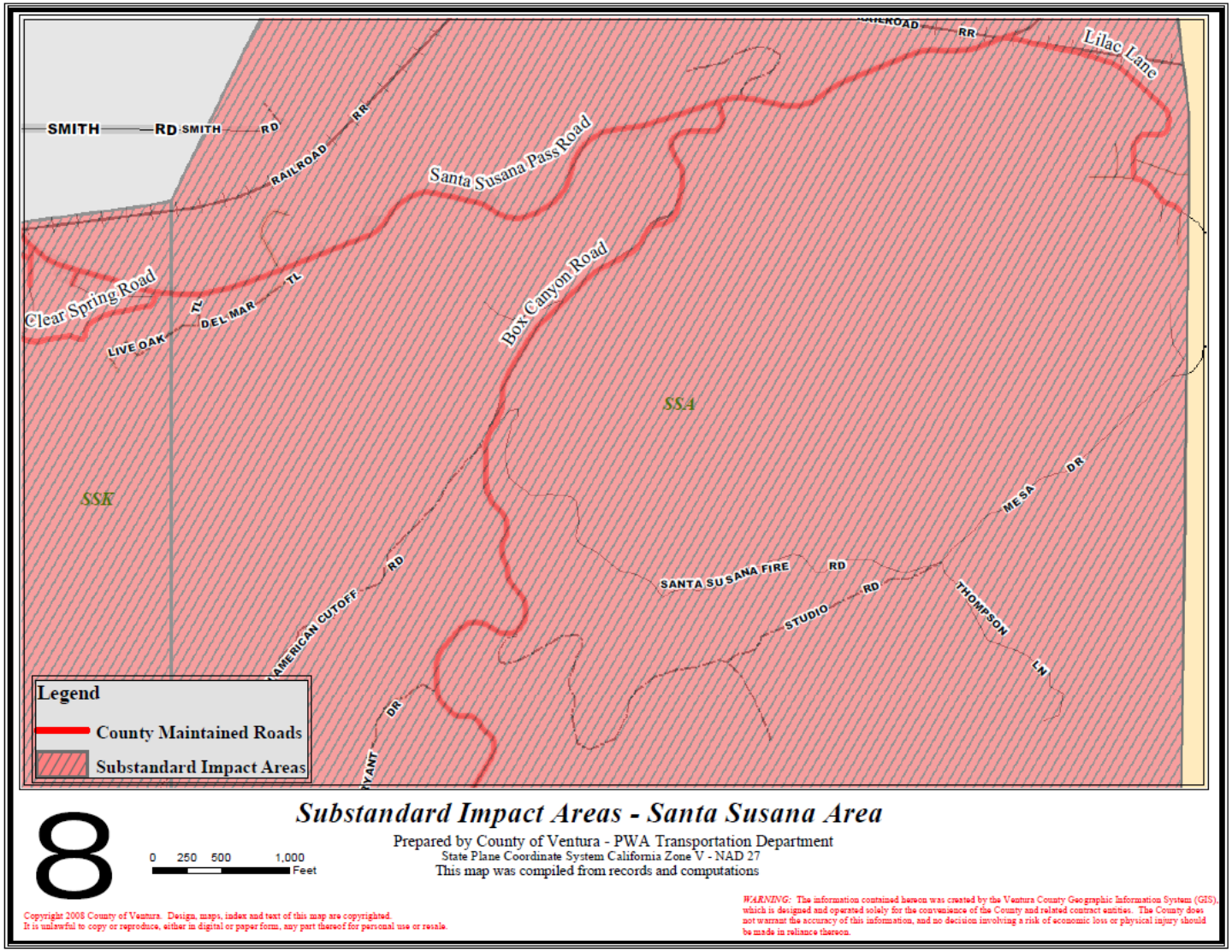


Figure 26-5. Ventu Park Area Substandard Impact Area Map

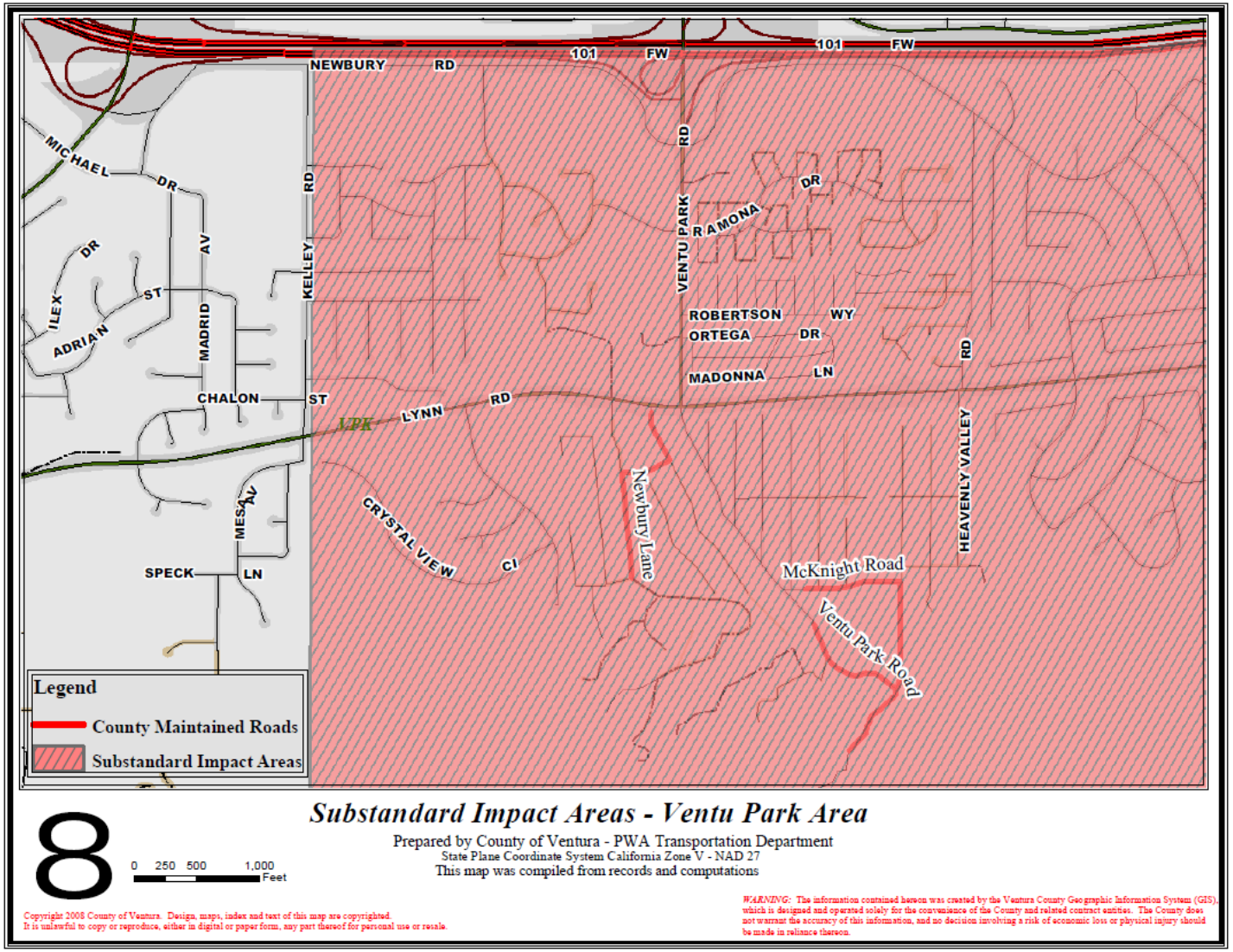


Figure 26-6. Yerba Buena Area Substandard Impact Area Map

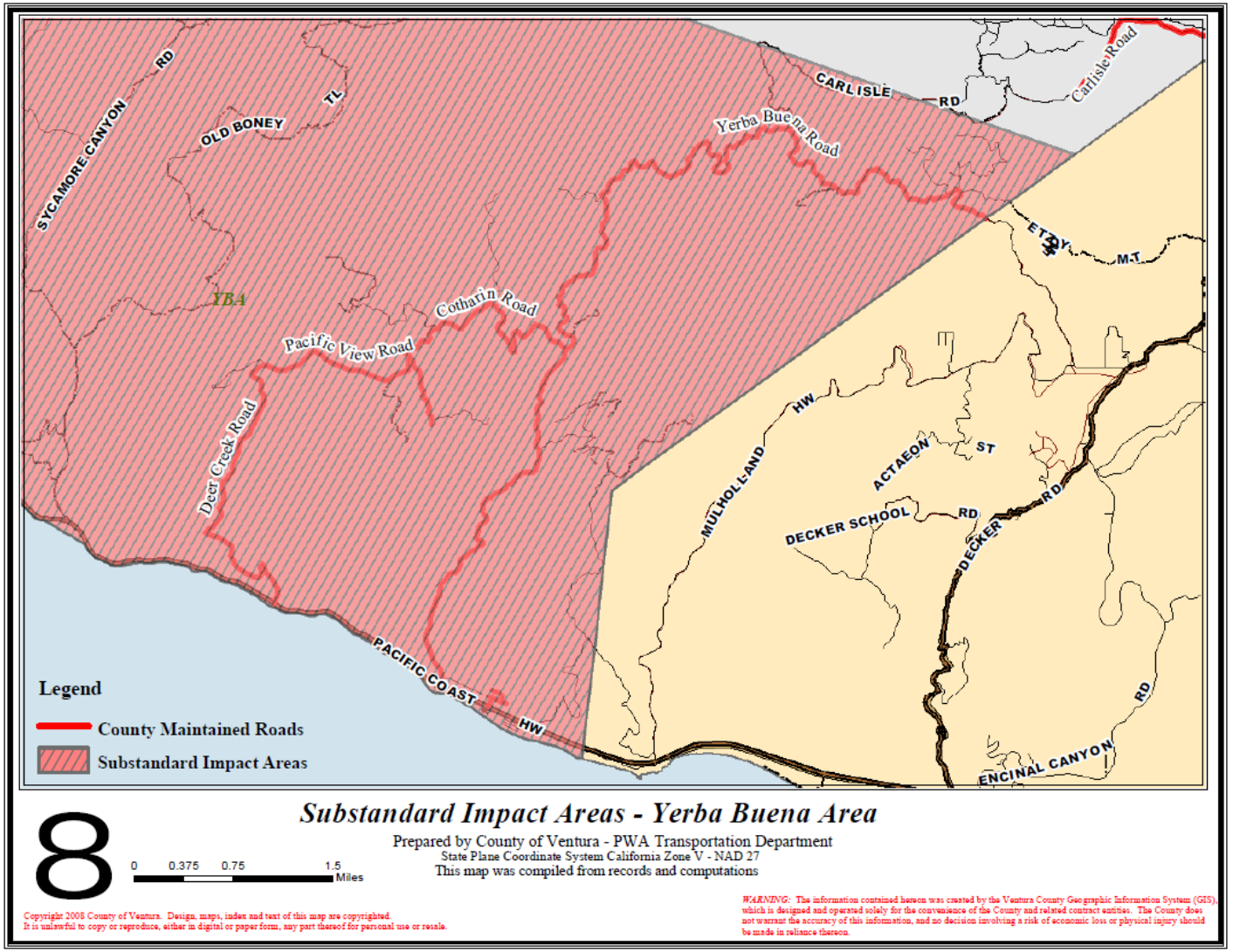
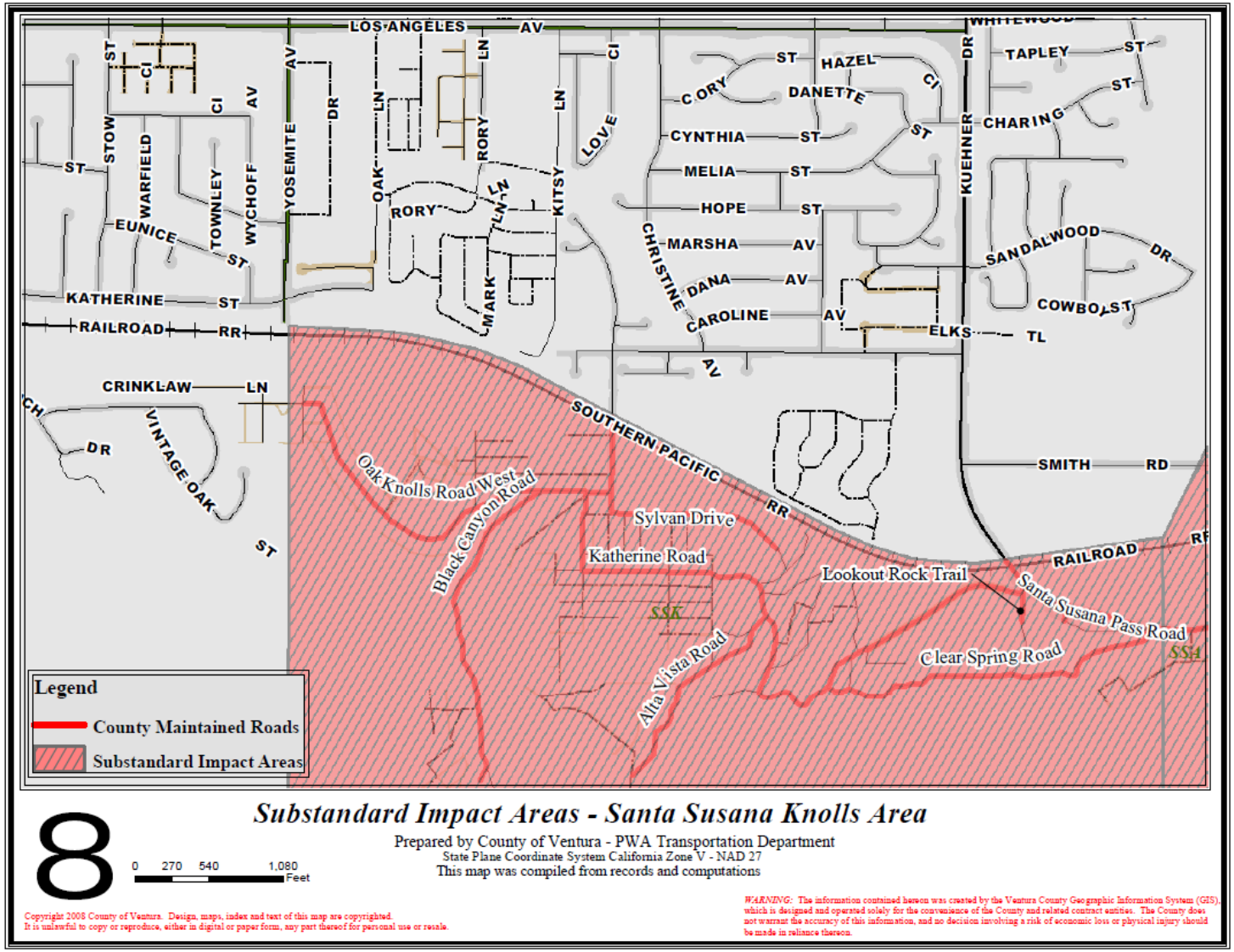


Figure 26-7. Santa Susana Knolls Area Substandard Impact Area Map



27. Glossary

The glossary contains definitions for technical terms that are used frequently throughout the Initial Study Assessment Guidelines document. Technical terms are identified throughout the document by italicized text with a subtle dashed green underline, such as *this example*. Federal, state, and local regulations or policies are cited as the source for several definitions. Where a conflict occurs between the definition in this document and the definition used in the regulation or policy, the definition from the regulation or policy shall prevail.

A

Acre-foot. The amount of water necessary to cover one acre (43,560 square feet) to a depth of one foot, or 43,560 cubic feet, which is equivalent to 325,828 gallons.

Acutely hazardous waste. Also commonly referred to as acute hazardous waste. means any hazardous waste classified as an acutely hazardous waste in the HSC at Division 20, Chapter 6.5, Article 2.

Adjacent. May also be referred to as "abut" or "adjoin." Nearby or in proximity to.

Affordable housing. As defined in Public Resources Code Section 21080.25, as may be amended, which means any of the following:

a. housing that is subject to a recorded covenant, ordinance, or law that restricts rents or sales prices to levels affordable, as defined in Section 50052.5 or 50053 of the Health and Safety Code, to persons and families of moderate, lower, or very low income, as defined in Section 50079.5, 50093, or 50105 of the Health and Safety Code, respectively;

b. housing that is subject to any form of rent or price control through a public entity's valid exercise of its police power; or

c. housing that had been occupied by tenants within five years from the date of approval of the development agreement by a primary tenant who was low income and did not leave voluntarily.

Agricultural conservation easement. A legally binding agreement/instrument that retains the land predominantly in its agricultural or open space condition. An agricultural conservation easement creates an interest in real property, is recorded in a deed and granted to a third party by, or on behalf of, the landowner and is binding upon successive owners of such land. Agricultural conservation easements must be held by a natural resource agency, a County-approved conservation organization, or the County of Ventura.

Airport Area of Influence (AAOI). An area defined for each airport that encompasses all areas within the boundaries of the 60 *decibel (dB) Community Noise Equivalent Level (CNEL)* aircraft *noise contour* and the approach and transitional surfaces at altitudes of 500 feet or less above the relevant airport elevations. This is the area where airport-related noise, safety, airspace protection, and overflight factors may significantly affect land use compatibility or necessitate restrictions on certain land uses as determined by the *Airport Land Use Commission*.

Airport Land Use Commission. As defined in the General Plan, as may be amended, which states: a commission authorized under the provisions of California Public Utilities Code, Section 21670 et seq., for the purposes of promoting compatibility between airports and the land uses surrounding them and are established, with limited exceptions, in each county where a public use airport is located. The Ventura County Transportation Commission serves as the designated ALUC for the four public, private, and military airports located within Ventura County.

Air Quality Assessment Guidelines (AQAG). An advisory document prepared by VCAPCD that

provides CEQA lead agencies, consultants, and project applicants with a framework and uniform methods for preparing air quality impact assessments and the air quality section of environmental documents for projects that require discretionary entitlements and approvals. Pursuant to CEQA, the AQAG recommend specific criteria and threshold levels for determining whether a proposed project may have a significant adverse air quality impact. The AQAG also provide mitigation measures that may be useful for mitigating the air quality impacts of proposed projects.

Air Quality Management Plan (AQMP). A VCAPCD air quality planning document that presents a combined state and local strategy for attaining federal ambient air quality standards and federal Clean Air Act planning requirements. The Air Quality Management Plan includes current air quality information, emissions inventory, local and state air pollutant control measures, new emission forecasts and projections, a new federal conformity budget for transportation projects, a reasonable further progress demonstration for precursors of *ozone*, a new countywide emission carrying capacity, and a demonstration how Ventura County will attain the federal *ozone* standard.

Ambient noise level. Defined in the General Plan, as may be amended, which states: the composite of noise from all sources; the normal or existing level of environmental noise at a given location. The ambient noise levels are expressed as L_{eqT} or *CNEL* as judged appropriate to the situation.

Archaeological resources. The locations where human activity has measurably altered the earth or left deposits of prehistoric or historic-era physical remains (e.g., stone tools, bottles, former roads, house foundations). The material remains (artifacts, structures, refuse, etc.) may have been produced purposely or accidentally by members of prehistoric human cultures.

Area Plan. As defined in the General Plan, as may be amended, which states: the land use plans for specific geographic subareas within the unincorporated area. The area plans govern the distribution, general location, and extent of uses of the land for housing, business, industry, open space, agriculture, and public facilities.

B

Base flood elevation. The elevation shown on the digital *Flood Insurance Rate Maps (FIRMs)* for flood zones 'AE', 'AH', 'A1-A30', 'VE', and V1-V30' that indicates the water surface elevation resulting from a flood that has a one percent chance of being equaled or exceeded in any given year.

Basin Plans. The Water Quality Control Plans, as may be amended, for three California Regional Water Quality Control Boards covering the Ventura County area: the Central Coast Region (Region 3), the Los Angeles Region (Region 4); and the Central Valley Region (Region 5).

C

Candidate species.

- **Federal candidate species.** Plants and animals for which the U.S. Fish and Wildlife Service has sufficient information on their biological status and threats to propose them as endangered or threatened under the Endangered Species Act, but for which development of a proposed listing regulation is precluded by higher priority listing activities.
- **State candidate species.** Native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the California Fish and Game Commission has formally noticed as being under review by the California Department of Fish and Wildlife for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list. State candidate species have equal legal protection as State listed threatened and endangered species under Fish

and Game Code Section 2050 et seq., Section 2081, and Title 14, California Code of Regulations, Section 670.1.

Certified Unified Program Agency (CUPA). The agency designated under the California Health and Safety Code for enforcement of regulations pertaining to hazardous materials. The County Environmental Health Division serves as the CUPA within Ventura County (except the City of Oxnard, where the City's Fire Department serves as the Oxnard CUPA). The City of Ventura Fire Department is a Participating Agency that implements the *Hazardous Materials Business Plan*, Aboveground Petroleum Storage, California Accidental Release Prevention and *Underground Storage Tank* programs within the city of Ventura.

Coastal Initial Study Biological Assessment (CISBA). A site-specific environmental assessment and impact and compensatory mitigation analysis prepared pursuant to County standards for an *Initial Study Biological Assessment* and the requirements of Coastal Zoning Ordinance Sections 8178-2.3, 8178-2.11.2(a) and Appendix E1, Section AE-1.3 for projects within or partially within the coastal zone.

Coastal sand dunes. A series of low hills of sand formed as a result of a combination of erosional forces, wind, and topographic features. Coastal dunes are generally divided into: (a) foredunes, which are small hillocks directly facing the ocean; and (b) backdunes, which are a series of hills that are usually higher and more continuously vegetated than the foredunes.

Community character. The distinctive physical quality, attributes, or features of an *established community* that set it apart from other communities or areas. These can include existing land uses, architectural form and style, lot area and the density of development.

Community Noise Equivalent Level (CNEL). Defined in the General Plan, as may be amended, which states: the average A-weighted noise level during a 24-hour day, obtained after addition of five decibels to noise levels occurring in the evening from 7:00 p.m. to 10:00 p.m. and the addition of 10 decibels to sound levels measured in the night between 10:00 p.m. and 7:00 a.m.

Conservation easement. Defined in the Ventura County Coastal Zoning Ordinance, as may be amended, which states: A legally binding instrument that retains the land predominantly in its natural, scenic, agricultural, forested, or open space condition or that preserves and protects native plants, animals and biotic communities. A conservation easement creates an interest in real property, is recorded in a deed and granted to a third party by, or on behalf of, the landowner and is binding upon successive owners of such land. Conservation easements should be held by a natural resource agency, a County-approved conservation organization as defined in the Ventura County Coastal Zoning Ordinance, or the County of Ventura.

Conservation instrument. Defined in the Ventura County Coastal Zoning Ordinance section 8172-1, as may be amended, which states: A legal mechanism used to ensure the protection of sensitive resources (e.g., biological, archaeological, tribal cultural, historic, paleontological, etc.) from development in the form of a deed restriction executed by, or on behalf of, the owner of the land that is binding upon successive owners of the land. Such instruments should contain a written description of the legal arrangements including site ownership, management, and enforcement of any use restrictions – and be legally sufficient, enforceable, properly recorded in the chain of title, and able to ensure the protection of the resource in perpetuity.

Constituent. An informal term used to describe a detectable element, component, or attribute of waste or effluent.

Core habitat areas. Areas of habitat composed of a *habitat patch* (species dependent) or aggregation of *habitat patches* that are of sufficient size to support the long-term survival of a self-sustaining population of a species, which are not fragmented in a way that isolates populations of that species.

County View. The publicly available geographic information systems web application that consists of various publicly available data depicted as map layers. Examples of map layers include, but are not limited to zoning, cities, political districts, and designated hazard areas.

Criteria pollutants. Defined in the General Plan, as may be amended, which states: the criteria pollutants are the six principal pollutants harmful to public health and the environment for which the Environmental Protection Agency has set National Ambient Air Quality Standards (NAAQS). The pollutants are: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), *ozone* (O_3), *particulate matter (PM)*, and sulfur dioxide (SO_2).

Critical Wildlife Passage Area (CWPA). An overlay zone within the larger Ventura County Habitat Connectivity and Wildlife Corridor (HCWC) overlay zone that is subject to additional land use limitations within the Ventura County Non-Coastal Zoning Ordinance (Sec. 8109-4.9). CWPAs are identified as critical chokepoints within the larger HCWC overlay zone where the loss of *landscape connectivity* is a foreseeable threat and would cause the overall *habitat connectivity corridor* to be defunct in its purpose to connect isolated coastal ecosystems (e.g., Santa Monica Mountains) to inland *regional landscape linkages* (e.g., Simi Hills, Los Padres Forest).

Cultural heritage site. Defined in the Ventura County Cultural Heritage Ordinance, as may be amended, which generally states: An improvement, natural feature, site, or district that has completed the legally required procedures stipulated in the Cultural Heritage Ordinance to have it designated by the Cultural Heritage Board or the Board of Supervisors as a District, Landmark, Site of Merit, or Point of Interest as defined in the Ventura County Cultural Heritage Ordinance.

D

Decibel (dB). Defined in the General Plan, as may be amended, which states: a physical unit commonly used to describe noise levels. It is a unit for describing the amplitude of sound, as heard by the human ear. A dB is the logarithmic ratio of two like pressure quantities, with one pressure quantity being a reference sound pressure. For sound pressure in air the standard reference quantity is generally considered to be 20 micropascals, which directly corresponds to the threshold of human hearing and is equivalent to 0 dB, the quietest sound a human can hear. The use of the decibel is a convenient way to handle the million-fold range of sound pressures to which the human ear is sensitive.

Development envelope. An area of land that consists of the proposed maximum limits of allowable temporary and permanent direct land and vegetation disturbance for a project, including but not limited to the building pad(s), driveways or roads/road improvements, entry gates/fences, grading, septic systems, wells, drainage improvements, fuel modification zones, water tanks, landscaping, storage/stockpile areas, construction staging areas, fire department turnarounds, utility trenches and other site grading.

Direct impacts. Shall have the same meaning as "direct or primary effects" as defined in the State CEQA Guidelines Section 15358, as may be amended, which states: Effects which are caused by the project and occur at the same time and place.

Disability glare. A type of glare that ranges from causing temporary incapacity to causing damage to the eye.

Discomfort glare. A type of glare that viewers find distracting and objectionable but does not cause damage to the eye.

Dwelling Unit. One or more rooms with internal access between all rooms, which provide complete independent living facilities for one *household*, including permanent provisions for living, sleeping, eating, cooking, bathing, and sanitary facilities but containing only one kitchen. Accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) are also dwelling units, except for purposes of calculating the maximum allowable densities for the lots on which they are located, in which case the ADUs and/or JADUs shall not be counted as additional dwelling units.

E

Element occurrence. A biological unit that has practical conservation value for a species or ecological community and sustains or contributes to the survival of a species or ecological community. An element occurrence is a population of a species that is present and would be impacted by the project. The following examples of element occurrences are provided as guidance:

a. Plants: A population or group of populations found within 0.25 miles of one another and not separated by significant habitat discontinuities.

b. Animals with Limited Mobility (e.g., most invertebrates, amphibians, reptiles, small mammals, and resident birds). For example, these animals may take several generations to move through the landscape.

c. Mobile Animals (e.g., migratory birds, fish and larger mammals): The location of breeding areas (including nesting territories, dens, and leks) or parts of the range of a mobile population that contribute to the persistence of that population, such as roosts, overwintering areas, migration areas and staging areas.

Endangered, rare, or threatened species. Defined in State CEQA Guidelines Section 15380, as may be amended, which states:

a. "Species" means a species or subspecies of animal or plant or a variety of plant.

b. A species of animal or plant is:

1. "Endangered" when its survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors; or

2. "Rare" when either:

a) Although not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or

b) The species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered "threatened" as that term is used in the Federal Endangered Species Act.

c. A species of animal or plant shall be presumed to be endangered, rare or threatened, as it is listed in:

1. Sections 670.2 or 670.5, Title 14, California Code of Regulations; or

2. Title 50, Code of Federal Regulations Sections 17.11 or 17.12 pursuant to the Federal Endangered Species Act as rare, threatened, or endangered.

d. A species not included in any listing identified in subdivision (c) shall nevertheless be considered to be endangered, rare or threatened, if the species can be shown to meet the criteria in subdivision (b).

e. This definition shall not include any species of the Class Insecta which is a pest whose protection under the provisions of CEQA would present an overwhelming and overriding risk to man as determined by:

1. The Director of Food and Agriculture with regard to economic pests; or

2. The Director of Health Services with regard to health risks.

Environmentally Sensitive Habitat Areas (ESHA). Defined in the Ventura County Coastal Zoning Ordinance, as may be amended, which states: Any area in the Coastal Zone in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and development. For a definition of habitats classified as ESHA, see Section 8178-2.4 of the Ventura County Coastal Zoning Ordinance.

Established community. An inhabited area within a city or county that is comprised of no less than 10 *dwelling units adjacent* or in close proximity to one another.

Existing Community Designated Area. Defined in the General Plan, as may be amended, which states: The boundaries of an areas within Existing Communities in the 2040 General Plan and areas identified in the Save Open Space & Agricultural Resources (SOAR) initiative as "Existing Community Land Use Designation." These areas identify existing urban residential, commercial, or industrial enclaves outside of incorporated areas and urban centers. Existing Community Designated Areas include uses, densities, intensities, and zone classifications that area normally found in incorporated areas or urban centers, but which do not qualify as urban centers.

F

Feasible. Defined in State CEQA Guidelines Section 15364, as may be amended, which states: capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

Fire hazard. Defined in the Ventura County Fire Code, as may be amended, which states: the potential loss of life and/or property due to fire. Fire hazard is further defined as a condition, arrangement, or act which will increase or may cause an increase of the hazard or menace of fire to a greater degree than customarily recognized as normal by persons in the public service of preventing, suppressing or extinguishing fire; or conditions which may obstruct, delay, or hinder egress from a facility or building, or may become the cause of obstruction, delay or hindrance to the prevention, suppression, or extinguishment of a fire.

Fire Hazard Severity Zones (FHSZ). Defined in the Ventura County Fire Code, as may be amended, which states: geographical areas designated pursuant to California Public Resources Codes Sections 4201 through 4204 and classified as Moderate, High, and Very High in State Responsibility Areas or as Moderate, High and Very High Fire Hazard Severity Zones in Local Responsibility Areas designated pursuant to California Government Code Sections 51175 through 51189.

Fire Protection Plan. Defined in the Ventura County Fire Code, as may be amended, which states: a document prepared for a specific project or development that describes methods for monitoring, controlling, and extinguishing spot fires. Specific requirements of a Fire Protection Plan are included in Section 4903 of the Ventura County Fire Code.

Flood Insurance Rate Map (FIRM). The official map produced using digital methods on which the Federal Emergency Management Agency (FEMA) delineates *Special Flood Hazard Areas* and risk premium zones applicable to a community, including any FEMA-issued amendments and/or revisions thereto.

Flood Insurance Study. Defined in the Ventura County Floodplain Management Ordinance, as amended, which states: the official report provided by the Federal Insurance Administration that includes flood profiles, the *Flood Insurance Rate Map*, the Flood Boundary and Floodway Map, and the water surface elevation of the base flood.

Forest land. Land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

Fossils. Any remains, trace, or imprint of a plant or animal that has been preserved in the Earth's crust from some past geologic or prehistoric time.

Fuel break. Defined in the Ventura County Fire Code, as amended, which states: an area strategically located for fighting anticipated fires where the native vegetation has been permanently modified or replaced so that fires burning into it can be more easily controlled. Fuel breaks divide fire-prone areas into smaller areas for easier fire control and to provide access for firefighting.

Fully protected species. Animals which are rare or face possible extinction and are protected by the California Department of Fish and Wildlife pursuant to

Fish & Game Code Sections 3511, 4700, 5050, and 5515.

G

Greenhouse gases (GHGs). Defined in the General Plan, as may be amended, which states: any gas that absorbs infrared radiation in the atmosphere. The principal greenhouse gases associated with global warming and climate change that are commonly included in GHG emissions inventories include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).

Groundwater basin. Defined in the General Plan, as may be amended, which states: an aquifer or system of aquifers that has reasonably well-defined boundaries and more or less definite areas of recharge and discharge. Refers to subsurface deposits and geologic formations that are capable of yielding usable quantities of water to a well or spring. The Sustainable Groundwater Management Act (SGMA) defines "basin" as a groundwater basin or subbasin identified and defined in the California Department of Water Resources (DWR) Bulletin 118, or as modified pursuant to Section 10722 of the Act.

H

Habitat connectivity corridor. Also referred to as "wildlife corridor" or "habitat connectivity features." Defined in the Ventura County Coastal Zoning Ordinance, as may be amended, which states: An area of contiguous natural habitats of sufficient width to facilitate the movement, migration, foraging, reproduction, and dispersal of multiple animal or plant species between two or more *core habitat areas*. Riparian habitats, waters and wetlands, *stepping stones*, canyons, *habitat patch*, surface water feature as defined in the Ventura County Non-Coastal Zoning Ordinance, crossing structures and their adjacent areas, and ridgelines function as habitat connectivity corridors or habitat connectivity features. In some cases, areas of natural vegetation within a matrix of unsuitable habitat may serve as a *habitat patch* or movement corridor for species.

Habitat patch. Any discrete area with a definite shape and spatial configuration that contains specific resources for an organism to survive (reproduction, shelter, water, overwintering, dispersal, etc.). It can be defined by discontinuities in vegetation, soils, waters, home range size, or defined as habitat or non-habitat depending on the species.

Hazardous Fire Areas (HFA). Defined in the Ventura County Fire Code, as may be amended, which states: land which is covered with grass, grain, brush, or forest, whether privately or publicly owned, which is so situated or is of such inaccessible location that a fire originating upon such land would present an abnormally difficult job of suppression or would result in great and unusual damage through fire or resulting erosion and includes any location within 500 feet of a forest or brush, grass, or grain covered land, exclusive of small individual lots located outside of a brush, forest, or grain covered area. Such areas are designated by the Fire Code Official. The Fire Code Official is authorized to utilize, as references, the definition of Wildland-Urban Interface (WUI), State Responsibility Area *FHSZ* maps, Local Responsibility Area *FHSZ* designated pursuant to California Government Code, Sections 51175 through 51189 and the International Wildland-Urban Interface Code. Areas classified as a HFA are designated as a WUI area pursuant to the Ventura County Fire Code.

Hazardous Materials Business Plan. Also known as "Business Plan" as defined in HSC Section 25501. A plan that includes a chemical inventory, emergency response plans and procedures, and employees training. The Business Plan is required to be prepared by every business that handles hazardous materials (pursuant to HSC Section 25116) in quantities equal to or greater than 500 pounds, 55 gallons, or 200 cubic feet at standard temperature and pressure for a compressed gas.

Household. All the persons who occupy a *dwelling unit*; the occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who

share living arrangements, unless otherwise specified by state law.

Human-wildlife conflict. Refers to the many ways, perceived or real, in which humans and wild animals may compete for resources, such as food, water, and/or space. It may include instances of violent or deadly interactions between animals and humans. Such conflict may occur anywhere that human communities overlap with wild animal habitats, including in both urban and rural areas.

Hydrogeologic unit. Soil or rock unit or zone that has a distinct influence on the storage and/or movement of groundwater from its hydraulic properties.

Hydrologic unit. A drainage area boundary delineated by DWR as a hydrologic unit, subunit or subarea which may contain one or more *groundwater basins*.

I

Important Farmland. Land with soil recorded by the California Department of Conservation Farmland Mapping and Monitoring Program as one of the following categories:

- **Farmland of Local Importance.** Defined in the General Plan, as may be amended, which states: a category that consists of local soils that are listed as Prime or Statewide Importance. This farmland is not irrigated and includes such dry land crops as beans or grain.
- **Farmland of Statewide Importance.** Defined in the General Plan, as may be amended, which states: a category that generally includes lands with a good combination of physical and chemical features for the production of agricultural crops. The criterion is basically like that of Prime Farmland but there is no minimum soil depth limitation and no permeability restriction. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Prime Farmland.** Defined in the General Plan, as may be amended, which states: a category that has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Prime Farmland must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Unique Farmland.** Defined in the General Plan, as may be amended, which states: a category that consists of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.

Indirect impacts. Shall have the same meaning as "indirect or secondary effects" as defined in the State CEQA Guidelines Section 15358, as may be amended, which states: Effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Individual water system. A system which obtains water from an onsite water well or wells used to supply domestic water to no more than four (4) service connections and serves less than 25 individuals at least 60 days out of the year.

Initial Study Biological Assessment (ISBA). Also commonly known as a "biological resource assessment." A comprehensive biological resource assessment prepared and conducted to County standards by a *qualified biologist* to identify, analyze, and mitigate a project's adverse impacts on biological resources.

J

K

L

Landscape connectivity. The physical arrangement of habitat within the landscape (e.g., trees, shrubs, habitat) that links separate biological populations and the degree to which it facilitates and/or impedes the response or movement of an organism to that arrangement of habitat and/or ecological processes.

Lead Agency. Defined in State CEQA Guidelines Section 15367, as may be amended, which states: The public agency which has the principal responsibility for carrying out or approving a project. The Lead Agency will decide whether an EIR or ND will be required for the project and will cause the document to be prepared. Criteria for determining which agency will be the Lead Agency for a project are contained in State CEQA Guidelines Section 15051.

Littoral cell. A section of shoreline where the flow of sand begins at a major sediment source such as a river, and terminates at a major sediment sink, such as a submarine canyon.

Local Enforcement Agency. Refers to the Environmental Health Division of the Resource Management Agency of the County of Ventura. The Environmental Health Division is designated as the Local Enforcement Agency by the California Integrated Waste Management Board pursuant to Public Resources Code Division 30, Part 4, Chapter 2, Article 1. The Local Enforcement Agency is responsible for the enforcement of state statutes and regulations relative to the storage, transfer, processing, handling and disposal of solid waste.

Locally important plant communities. Identified in the Ojai Valley Area Plan and includes the following plant communities: Southern Sycamore-Alder, Riparian Woodland, California Walnut Woodland, Southern Coast Live Oak Riparian Forest, Oak Woodlands, and Coastal Sage-Scrub Community.

Locally important species. Species designated by the County of Ventura as locally important species are sensitive and/or unique to the County because they may occur in different microsite conditions than at the rest of their range, represent the limits of their natural range, are genetically distinct from the main population of the species, and/or they are differentiated from the main population due to other circumstances. Locally important species exclude species that are listed as, or are under consideration for designation as *endangered, rare, or threatened* at the state or federal level; and species that are listed as extinct, non-native, or endemic to the Channel Islands. The following criteria define a locally important species:

a. Locally important plant species: Taxa that are declining throughout the extent of their range and have a maximum of five (5) or fewer presumed extant *element occurrences* in Ventura County.

b. Locally important animal species: Taxa for which habitat in Ventura County is crucial for their existence either globally or in Ventura County. This includes:

    1. Taxa for which the population(s) in Ventura County represents 10 percent or more of the known extant global distribution; or

    2. Taxa for which there are five or fewer presumed extant *element occurrences*, or less than 1,000 individuals, or less than 2,000 acres of habitat that sustains populations in Ventura County; or

    3. Native taxa that are generally declining throughout their range or are in danger of extirpation in Ventura County.

Low vehicle miles traveled (VMT) area. A *Traffic Analysis Zone (TAZ)* with the applicable development

VMT metric at least 15 percent below the regional (unincorporated area) average as modeled by the *Ventura County Transportation Model (VCTM)*.

Lower income. Income that is low income, very low income, extremely low income, or acutely low income, as defined in Government Code section 65582, as may be amended.

Luminance histogram. A method developed by Ball State University Professors Schiler, Japee and Culp. This determination consists of inputting a set of digital photographs from a subject glare source into a computer simulation program and generating a graph that identifies brightness levels of different sections of the scene, from darkest to brightest.

M

Maximum contaminant level (MCL). Defined in Health and Safety Code Section 116275(f), as may be amended, which states: The maximum permissible level of contaminant in water. Refer to the California Code of Regulations, Title 22, Division 4, Chapter 15 for MCL levels for drinking water standards.

Metric tons of carbon dioxide equivalent ($MTCO_2e$). Defined in the General Plan, as may be amended, which states: The unit "CO_2e" is the measure of how much heat trapping potential a given type of greenhouse gas has on average over a 100-year time period, based on its molecular structure compared to carbon dioxide (CO_2). CO_2 has a baseline of one, while other gases can be tens to thousands of times higher. The carbon dioxide equivalent for a gas is derived by multiplying the tons of the gas by the associated global warming potential. Carbon dioxide equivalents are commonly expressed as "metric tons of carbon dioxide equivalents" ($MTCO_2e$).

Mineral Resource Zones (MRZs). Defined in the General Plan, as may be amended, which states: the State Mining and Geology Board (SMGB) investigates and designates lands underlain by mineral resources as a Mineral Resource Zone (MRZ) based on the known or inferred presence of mineral resources. The MRZ consists of four categories: MRZ-1, *MRZ-2*, MRZ-3, and MRZ-4.

Mobile source. Sources of air pollution such as automobiles, motorcycles, trucks, off-road vehicles, boats, and airplanes.

Moderate income. The income for *households* exceeding the limit for *lower income households* and that does not exceed 120 percent of area median income, as set forth in Health and Safety Code section 50093. "Area median income" is the median family income of a geographic area of the state as reflected in the official State Income Limits published annually by the Department of Housing and Community Development (HCD).

MRZ-2. A *Mineral Resource Zone* category that consists of areas underlain by mineral deposits where geologic data show that significant measured or indicated resources are present (2a) or where such resources are inferred (2b).

Municipal Separate Storm Sewer Systems (MS4) Permit. Permit setting forth *Waste Discharge Requirements (WDRs)* for Storm Water and Non-storm Water Discharges from the MS4 within Ventura County, and the incorporated cities therein, more specifically titled *National Pollutant Discharge Elimination System (NPDES) Permit* No. CAS004002, Los Angeles Regional Water Quality Control Board (LARWQCB) Order No. R4-2010-0108, or the then-current MS4 Permit, as amended.

N

Noise contours. Lines drawn, based on noise modeling or measurements, indicating equal levels of noise exposure for a known source of noise. In practice, noise contours are often shown as calculated for the dominant source of noise only.

Noise sensitive uses. Defined in the General Plan, as may be amended, which states: land uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. These uses include residences; schools; nursing homes;

historic sites; cemeteries; parks, recreation, and open space areas; hospitals and care facilities; hotels and others short-term lodging (e.g., bed and breakfasts, motels); places of worship; and libraries.

Nonattainment area. Defined in the General Plan, as may be amended, which states: an area or air basin that does not meet California or National ambient air quality standards for a given *criteria pollutant*.

No net loss. A principle where if a development project cannot avoid the loss of a valued natural resource, the project mitigates the impacts by replacing the impacted habitat with a newly created or restored habitat of the same size and similar functional condition so that there is no loss of ecological functions and values of that habitat type for a defined area. Similar functional condition means the relative ability to support and maintain the same species composition, diversity, and functional organization as the impacted habitat.

Nonunique archaeological resource. Shall have the same meaning as used in and defined by CEQA Section 21083.2(h), as may be amended, which generally states: An archaeological artifact, object, or site which does not meet the criteria in PRC Section 21083.2(g). A nonunique archaeological resource need not be given further consideration, other than the simple recording of its existence by the *Lead Agency* if it so elects.

National Pollutant Discharge Elimination System (NPDES) Permit. - A water quality permit allowing a discrete discharge of water or wastes to "navigable waters", or surface waters, of the United States, as established under the federal Clean Water Act's NPDES and administered by the LARWQCB.

O

Onsite wastewater treatment system (OWTS). Defined in the General Plan, as may be amended, which states: Includes individual disposal systems, community collection and disposal systems, and alternative collection and disposal systems that use a subsurface disposal method. OWTS do not include "graywater" systems as defined in Health and Safety Code Section 17922.12(a).

Overdrafted basin. The condition of a *groundwater basin* in which the amount of water withdrawn by pumping exceeds the amount of water that recharges the basin over a period of years during which water supply conditions approximate average conditions.

Oxides of Nitrogen ("NOx"). A general term pertaining to compound of nitric oxide (NO), nitrogen dioxide (NO_2), and other oxides of nitrogen. Nitrogen oxides are typically created during combustion processes and are major contributors to smog formation and acid deposition. NO_2 is a criteria air pollutant and may result in numerous adverse health effects.

Ozone. A strong smelling, pale blue, reactive toxic chemical gas consisting of three oxygen atoms. It is a product of the photochemical process involving the sun's energy and ozone precursors such as hydrocarbons and *oxides of nitrogen*. Ozone exists in the upper atmosphere ozone layer (stratospheric ozone) as well as at the Earth's surface in the troposphere (ozone). Ozone in the troposphere causes numerous adverse health effects and is a criteria air pollutant. It is a major component of smog.

Ozone precursors. Chemicals such as non-methane hydrocarbons and *oxides of nitrogen*, occurring either naturally or as a result of human activities, which contribute to the formation of *ozone*, a major component of smog.

P

Paleontological importance. Reflects the potential productivity of a geologic formation and the importance of the particular *fossils* located in the formation.

Paleontological resources. Defined in the General Plan, as may be amended, which states: the fossilized remains of ancient plants and animals.

Particulate matter (PM). Defined in the General Plan, as may be amended, which states: Also known as

particle pollution, is a complex mixture of extremely small particles and liquid droplets. Particle pollution is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. Dust and other particulates exhibit a range of particle sizes. Particulate matter is measured by two sizes:

- **PM10.** Course particles, or particles between 2.5 and 10 micrometers in diameter.
- **PM2.5.** Fine particles (PM2.5), or particles less than 2.5 micrometers in diameter.

Public viewing location. Any physical area that is accessible to the public and from which a *scenic resource* is visible. Examples of *public viewing locations* include (but are not limited to) public roads, parks, trails, bike paths, lakes, and beaches.

Public water system. Defined in Health and Safety Code Section 116275(h), as may be amended, which states: A system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves an average of at least 25 individuals daily at least 60 days of the year and is permitted and regulated by the State Water Resources Control Board, Division of Drinking Water.

Q

Qualified biologist. Standards for a qualified biologist are established as part of the Ventura County Qualified Biologist Program administered by the Resource Management Agency Planning Division. The qualified biologist shall have the training and expertise in the taxonomic group or species on which field surveys are focused, as well as the County's data review procedures and survey methods recommended by natural resource agencies or commonly accepted standards in the taxonomic group, community, or species (e.g., U.S. Fish and Wildlife Service and/or California Department of Fish and Wildlife survey protocols). Standards are established as part of the Ventura County Qualified Biologist Program administered by the Resource Management Agency Planning Division. A Lead Agency may also establish its own additional minimum qualifications for biological consultants to identify qualified biologists for purposes of environmental review pursuant to CEQA.

R

Reactive organic compounds (ROC). Defined in the General Plan, as may be amended, which states: photochemically reactive and are composed of nonmethane hydrocarbons. These gases contribute to the formation of smog.

Regional landscape linkage. A large, regional area of land containing *habitat connectivity corridors* (not necessarily linear) between *core habitat areas* intended to support the long-term movement of multiple species and the essential flows of ecosystem processes across the landscape. The Habitat Connectivity and Wildlife Corridor (HCWC) overlay zone as defined in the Ventura County Non-Coastal Ordinance, as amended, represents a regional landscape linkage. The HCWC include the following regional landscape linkages: Santa Monica Mountains – Simi Hills; Santa Monica Mountains – Santa Susana Mountains; Simi Hills- Sierra Madre; Santa Clara River, Ventura River.

Regional Road Network. Defined in the General Plan, as may be amended, which states: the road system in Ventura County that consists of roads classified as Primary (6 lanes or more), Secondary (4 lanes) or Collector (2 lanes), as well as freeways, expressways and conventional State highways.

Regulatory Floodway. Also commonly referred to as a Floodway. Defined in the Ventura County Floodplain Management Ordinance, as amended, which states: the channel of a river or other watercourse and the *adjacent* land areas that must be reserved in order to discharge the base flood without cumulatively increasing the water surface elevation more than one foot prior to encroachment into the floodplain.

Renewable energy. Defined in the General Plan, as may be amended, which states: a form of energy

derived from a natural resource that is not depleted by use and is available as natural flows of energy and materials in the environment, such as solar, wind, tide, waves, plant matter, geothermal, and by-products of human activities.

Resource Management Agency Geographic Information System Viewer (RMA GIS Viewer). The geographic information systems web application used by County of Ventura staff, which consists of various data depicted as map layers, some of which are not publicly available on *County View*.

Restricted material. Pesticides and materials listed in section 6400 of title 3 of the California Code of Regulations (CCR), except for those designated and established as "exempt materials" under section 6402 of title 3 of the CCR.

Risk Management Plan. A document that describes a risk management program to proactively prevent and prepare for accidental releases. A Risk Management Plan is required of any facility which handles, manufactures, uses, or stores more than a threshold quantity of a regulated substance as listed in the California Code of Regulations, Title 19, Division 5, Chapter 2, Article 9.

S

Scenic vista. Defined in the General Plan, as may be amended, which states: a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public.

Sensitive biological resources. Biological resources including but not limited to: *special-status species* and the habitats that support them, beaches, dunes, coastal bluffs, rocky outcrops, colonial roosting sites, fresh and salt *water and/or wetland* and their associated riparian and alluvial vegetation, native tree woodlands/savannahs, and *habitat connectivity corridors*.

Sensitive plant communities. Plant communities that are ranked as G1 or S1 (critically imperiled globally or statewide), G2 or S2, or G3 or S3 in the California Natural Diversity Database (CNDDB) and the Vegetation Classification and Mapping Program (VegCAMP), both of which are administered by the California Department of Fish and Wildlife; oak woodlands, pursuant to Public Resources Code Section 21083.4; and *locally important plant communities*.

Sensitive receptors. Defined in the General Plan, as may be amended, which states: populations or uses that are more susceptible to the effects of air pollution than the general population, such as long-term health care facilities, rehabilitation centers, retirement homes, convalescent homes, residences, schools, childcare centers, and playgrounds.

Shoreline protective device. A permanent or semi-permanent structure intended to reduce or prevent coastal erosion from wave action and other natural forces, including but not limited to seawalls, revetments, breakwaters, jetties, groins, bluff retaining walls, or other such engineered construction that alters shoreline processes.

Special Flood Hazard Area (SFHA). Defined in the Ventura County Floodplain Management Ordinance, as amended, which states: an area in the floodplain subject to a one percent or greater chance of flooding in any given year. It is shown on the *Flood Insurance Rate Map* as Zone A, AO, A1-A30, AE, A99, AH, V1-V30, VE, or V.

Special-status species. Species listed as *locally important species*, *endangered, rare, or threatened species*, *candidate species*, *fully protected species*, and pursuant to CEQA Guidelines Section 15380(d), all other species tracked by the California Natural Diversity Database (CNDDB) which are considered by the California Department of Fish and Wildlife to be those species of greatest conservation concern. Plant species with a California Rare Plant Rank of 1, 2 or 4 are included in this definition, but plant species with a Rank of 3 are not included in this definition.

State small water system. Defined in Health and Safety Code Section 116275(n), as may be amended, which generally states: A system for the provision of piped water to the public for human consumption that serves at least five, but not more than 14, service connections and does not regularly serve drinking

water to more than an average of 25 individuals daily for more than 60 days out of the year.

Stationary sources. A non-*mobile source* of air pollution such as a power plant, refinery, distribution center, chrome plating facility, dry cleaner, port, rail yard, or manufacturing facility. Stationary sources of air pollution generally require an VCAPCD Permit to Operate.

Stepping stones. A type of wildlife movement corridor which consists of a series of isolated patches of suitable habitat, often only for temporary occupancy, that relatively mobile organisms use to move in steps from one survival patch to another.

Substantial evidence. Defined in State CEQA Guidelines Section15384, as may be amended, which states: Enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the *Lead Agency*. Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.

T

Timberland. Land, other than land owned by the federal government and land designated by the State Board of Forestry and Fire Protection as experimental *forest land*, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.

Toxic air contaminant (TAC). Air pollutants (excluding *ozone*, carbon monoxide, *PM10*, sulfur dioxide, nitrogen dioxide) that may reasonably be anticipated to cause cancer, developmental effects, reproductive dysfunctions, neurological disorders, heritable gene mutations or other serious or irreversible acute or chronic health effects in humans. Toxic air pollutants are regulated under different federal and state regulatory processes than *ozone* and the other criteria air pollutants. Health effects from exposure to toxic air pollutants may occur at extremely low levels.

Traffic analysis zone (TAZ). Also commonly referred to as a transportation analysis zone. The unit of geography used in transportation planning models dividing a planning region into relatively similar areas of land use or land activity and constructed by census block information of socio-economic data.

Transit use. Transit use is a public transportation option that conveys passengers such as, but not limited to a bus, light rail system, or passenger train.

Traffic Impact Study. An engineering study which describes how a new development or redevelopment would affect the area's local and regional transportation system and identifies measures to mitigate impacts from the project.

Tribal cultural resources. Defined in State CEQA Guidelines Section 21074, as may be amended, which generally states that tribal cultural resources are either of the following:

a. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

    1. Included or determined to be eligible for inclusion in the California Register of Historical Resources or in a local register of historic resources.

    2. Included in a local register of historical resources as defined in PRC Section 5020.1(k).

b. A resource determined by the *Lead Agency*, in its discretion and supported by *substantial evidence*, to be significant pursuant to criteria set forth in PRC Section 5024.1(c). In applying the criteria set forth in PRC Section 5024.1(c) for the purposes of this paragraph, the *Lead Agency* shall consider the significance of the resource to a California Native American tribe.

c. A cultural landscape that meets the criteria of CEQA Section 21074(a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

d. A historical resource described in PRC Section 21084.1, a *unique archaeological resource* as defined in PRC Section 21083.2(g), or a *nonunique archaeological resource* as defined in PRC Section 21083.2(h) may also be a tribal cultural resource if it conforms with the criteria of CEQA Section 21074(a).

Trustee Agency. Defined in State CEQA Guidelines Section 15386, as may be amended, which states: A State agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California. Trustee agencies include: the California Department of Fish and Wildlife with regard to the fish and wildlife of the State, to designated rare or endangered native plants, and to game refuges, ecological reserves, and other areas administered by the department; the State Lands Commission with regard to State owned "sovereign" lands such as the beds of navigable waters and State school lands; the State Department of Parks and Recreation with regard to units of the State Park System; and the University of California with regard to sites within the Natural Land and Water Reserves System.

U

Underground storage tanks. Any one or combination of tanks, including pipes connected thereto, which is used for the storage of hazardous substances as defined in the California Health and Safety Code, Division 20, Chapter 6.7, and which is substantially or totally beneath the surface of the ground.

Unique archaeological resource. Identified as a recorded cultural resource by the South Central Coast Information Center with the trinomial naming convention CA-VEN-"NUMBER," and which shall have the same meaning as used in and defined by Stated CEQA Guidelines Section 21083.2(g), as may be amended, which generally states: An archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

a. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

b. Has a special and particular quality such as being the oldest of its type or the best available example of its type.

c. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

V

Vehicle miles traveled (VMT). As defined in Section 15064.3 of the State CEQA Guidelines, as may be amended, which states: The amount and distance of automobile travel attributable to a project.

Ventura County Transportation Model (VCTM). A county-wide model developed by the Ventura County Transportation Commission (VCTC) consistent with regional and subregional models, including the base year and forecast year land-use projections and transportation networks. The VCTM provides data for transportation impact assessments, *VMT* forecasts for CEQA analysis, and air quality GHG emissions applications.

Vibration sensitive uses. Defined in the Federal Transit Administration's Transit Noise and Vibration Assessment Manual, as amended, as:

- **Vibration sensitive use category 1 (high sensitivity).** Buildings where vibration levels, including those below the threshold of human annoyance, would interfere with operations within the building. Examples include buildings where vibration sensitive research and manufacturing is conducted, including computer chip manufacturing, hospitals with

vibration sensitive equipment, and universities conducting physical research operations. The building's degree of sensitivity to vibration is dependent on the specific equipment that will be affected by the vibration. Equipment moderately sensitive to vibration, such as high-resolution lithographic equipment, optical microscopes which can be impacted at vibration levels below the threshold of human annoyance, and electron microscopes with vibration isolation systems are included in this category. For equipment that is more sensitive, a Detailed Vibration Analysis must be conducted.

- **Vibration sensitive use category 2 (residential).** All residential land uses and buildings where people normally sleep, such as hotels and hospitals. Transit-generated ground-borne vibration and noise from subways or surface running trains are considered to have a similar effect on receivers. Even in noisy urban areas, the bedrooms will often be in quiet buildings with effective noise insulation. However, ground-borne vibration and noise are experienced indoors, and building occupants have practically no means to reduce their exposure. Therefore, occupants in noisy urban areas are just as likely to be exposed to ground-borne vibration and noise as those in quiet suburban areas.
- **Vibration sensitive use category 3 (institutional).** Institutions and offices that have vibration- sensitive equipment and have the potential for activity interference such as schools, places of worship, medical offices. Commercial or industrial uses including office buildings are not included in this category unless there is vibration sensitive activity or equipment within the building. As with noise, the use of the building determines the vibration sensitivity.

Viewshed. The area that is visible from a *public viewing location*.

W

Waste Discharge Requirements (WDRs). The requirements adopted by order of the regional boards that regulate discharges of waste to surface water and discharges of waste to land. All waste discharges, including discharges to surface water and groundwater, are subject to California Water Code Sections 13260 and 13263 and are issued Waste Discharge Requirements (WDRs). WDRs include individual WDRs, general WDRs, or waivers of WDRs. Examples of relevant WDRs include Conditional Waiver for Discharges from Irrigated Lands Order No. R4-2021-0045 or as amended, and Conditional Waiver for Discharges of Trash from Nonpoint Sources Order No. R4-2020-0112 or as amended. Typical discharge types include domestic or municipal wastewater, food processing related wastewater, and industrial wastewater.

Water Availability Letter (WAL). Defined in the Ventura County Waterworks Manual, as may be amended, which states: A letter from a *water purveyor* declaring that the purveyor's water system has the necessary water capacity available to supply the domestic and fireflow requirements for the project or service area identified in the letter. The Water Availability Letter must be approved by the County Public Works Agency and signed by a member of the purveyor's Board of Directors or General Manager as compliant with all required criteria outlined in the Ventura County Waterworks Manual.

Water purveyor. A public utility, a mutual water company, a governmental body, or other entity, owning and operating a water system and holding a legal permit to purvey water from the State Division of Drinking Water or Ventura County Environmental Health Division. In the case of a public utility, it must also hold a valid "certificate of convenience and necessity" from the California Public Utilities Commission.

Water quality-based effluent limitations. Any restriction imposed by the *MS4 Permit* on quantities, discharge rates, and concentrations of pollutants, which are discharged from point sources to a

waterbody necessary to achieve a specific water quality standard.

Water quality objectives. The allowable limits or levels of water quality *constituents* or characteristics which are established for the reasonable protection of beneficial uses of water or the prevention of nuisance within a specific area as outlined in the *Basin Plans*.

Water quality standards. Provisions of state, territorial, authorized tribal or federal law approved by the U.S. Environmental Protection Agency that describe the desired condition of a waterbody and the means by which that condition will be protected or achieved.

Waters and/or wetlands. For the purposes of impact assessment, waters and wetlands that meet the definition for waters, wetlands, non-wetland waters, streams, rivers, or streambeds used by one or more of the following agencies with jurisdiction over the resource: U.S. Army Corps of Engineers (Section 404 of the Clean Water Act), the State and Regional Waterboards (section 401 of the and the Porter-Cologne Water Quality Control Act), CDFW (California Fish and Game Code, Section 1602), and the California Coastal Commission.

Williamson Act contract. Also commonly referred to as a Land Conservation Act Contract (LCA), Farmland Security Zone Area Contract (FSZA/LCA), or Open Space Contract (OS/LCA), which are intended to preserve agricultural or open space land and discourage its premature conversion to other uses.

X

Y

Z