

ADDENDUM NO. 3

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



**Prepared by:
County of Ventura
July 2025**

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CHAPTER 1 INTRODUCTION

This Addendum evaluates the environmental effects of proposed amendments (the “Project”) to programs and policies in the County of Ventura (“County”) 2040 General Plan (the “2040 General Plan” or “Plan”) for minor wording revisions and other updates. Several of the General Plan programs and policies are Environmental Impact Report (“EIR”) mitigation measures. The proposed Project is described in detail in **Chapter 2 Project Description**.

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

1.1 Document Format

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

1.2 Project History and Previous Environmental Analysis

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

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

1.3 Addendum Purpose

The County is proposing the General Plan Amendments described in Section 2.2 which would make minor text revisions and updates to a range of General Plan programs and policies, several of which are EIR mitigation measures. The intent of the updates is to add clarity and reduce ambiguity without resulting in substantive program or policy changes that would require additional technical analysis. This proposal is considered a “Project” under CEQA Guidelines Section 15378(a)(1) and is therefore subject to requirements of CEQA and the CEQA Guidelines. The County, as the Project proponent, is the designated Lead Agency under CEQA since it holds the primary authority to approve and carry out the General Plan Amendments.

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

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

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

impacts on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”

1.4 Determination

The proposed General Plan Amendments include minor text revisions and updates to several General Plan programs, policies, and associated mitigation measures as detailed in Section 2.2. All of the updates were completed to improve clarity, reduce potential ambiguity, and if applicable, update County processes and procedures to implement these implementation programs and policies. None of these updates result in any new significant environmental impact or a substantial increase in the severity of a previously identified significant environmental impact as analyzed in the 2040 General Plan EIR. Furthermore, there is no substantial change with respect to the circumstances under which the project is undertaken that would require substantial major revisions to the 2040 General Plan EIR due to the involvement of new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts. There is also no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the 2040 General Plan EIR was certified, showing that the project will result in a new or more severe environmental impact.

Because these proposed changes are necessary to the EIR but the conditions under Section 15162 of the CEQA Guidelines requiring a subsequent EIR have not been met, the County has prepared this Addendum, in accordance with Section 15164 of the CEQA Guidelines, to evaluate potential impacts of the Project.

CHAPTER 2 PROJECT DESCRIPTION

2.1 Project Description Overview

The Project would make minor wording updates to a range of General Plan programs and policies, several of which are EIR mitigation measures, to be more concise and clearer about the ultimate intent without resulting in substantive changes that would result in any new significant impacts or involve the need for additional technical analysis. The specific General Plan Amendments are included in Section 2.2 – Project Description. The proposed General Plan Amendments would apply to the Plan area as adopted, throughout unincorporated Ventura County where the County has authority to regulate land use activities. The County has land use regulatory authority over most unincorporated land and the unincorporated coastal zone in the county, including land owned or managed by special districts (e.g., cemetery districts, water districts), subject to limited exceptions, but not including land owned or managed by the State or federal government (e.g., State parks, State universities, national parks, U.S. Bureau of Land Management areas, and tribal lands).

2.2 Project Description

Table 1, which follows starting on Page 5, provides the full range of proposed updates to General Plan programs or policies, and revisions to associated EIR mitigation measures on the same technical topics. The table is organized to have the revisions to the applicable mitigation measure in Column 1 with tracked changes to show revisions. Similarly, the updates to the applicable General Plan program or policy are included in Column 2 with tracked changes. The clean draft version (without tracked changes) of both the applicable mitigation measure and the General Plan program or policy are included in Appendix 1 as Table 2.

Table 1 is organized so that each distinct mitigation measure with corresponding General Plan program or policy starts at the top of the page for clarity and readability.

As defined in the 2040 General Plan, the term “feasible,” as used in these mitigation measures and proposed amended policies and programs, means “capable of being accomplished in a successful manner within a reasonable period of time, taking in account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code § 21061.1) and the CEQA Guidelines (§15364). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

2.3 Approvals Required

The County Planning Commission will make a recommendation to the Board of Supervisors that the Board consider adoption of this Addendum to the 2040 General Plan EIR and approval of the proposed General Plan Amendments.

Table 1 – Proposed General Plan Program/Policy & EIR Amendments

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
AQ-1b New Implementation Program HAZ-X: Construction Air Pollutant Best Management Practices The County shall include the following new implementation program in the 2040 General Plan. Implementation Program HAZ-X: Construction Air Pollutant Best Management Practices Discretionary development projects that will <u>may</u> generate construction-related air <u>criteria pollutant</u> emissions <u>above the Air Quality Assessment Guidelines quantitative criteria pollutant threshold for project operations</u> shall be required to include the following types of emission reduction measures and potentially others, as recommended by VCAPCD in its Air Quality Assessment Guidelines 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 feasible¹, using electric-powered or other alternative fueled equipment in place of diesel powered equipment. 1. “Feasible” means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 210661.1) and the CEQA Guidelines section (§ 154364). The County shall be solely	PROGRAM HAZ-Y Construction Air Pollutant Best Management Practices Discretionary development projects that will <u>may</u> generate construction-related air <u>criteria pollutant</u> emissions <u>above the Air Quality Assessment Guidelines quantitative criteria pollutant threshold for project operations</u> shall be required to include the following types of emission reduction measures and potentially others, as recommended by VCAPCD in its Air Quality Assessment Guidelines 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 feasible² using electric-powered or other alternative fueled equipment in place of diesel powered equipment.. 2. “Feasible” means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 210661.1) and the CEQA Guidelines section (§ 154364). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
responsible for making this feasibility determination in accordance with CEQA.	

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
AG-1 New Policy AG-X: Avoid Development on Agricultural Land The County shall include the following new policy in the 2040 General Plan. Policy AG-X: Avoid Development on Agricultural Land The County shall ensure that discretionary development located on land identified as Important Farmland on the State's Important Farmland Inventory shall be conditioned to avoid direct loss of Important Farmland as much as feasibly possible <u>to the extent feasible</u>.	POLICY AG-1.8 Avoid Development on Agricultural Land The County shall ensure that discretionary development located on land identified as Important Farmland on the State's Important Farmland Inventory shall be conditioned to avoid direct loss of Important Farmland as much as feasibly possible <u>to the extent feasible</u>.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY																														
AG-2 New Implementation Program AG-X: Establish an Agricultural Conservation Easement The County shall include the following new implementation program in the 2040 General Plan. Implementation Program AG-X: Establish an Agricultural Conservation Easement Discretionary projects that would result in direct and/or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table below shall ensure the permanent protection of offsite farmland of equal quality at a 1:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement. “Offsite” means an area that is outside of the project’s permit boundaries if applicable, would not be disturbed by the project with respect to agricultural soils or production, and that otherwise complies with the below-stated requirements. 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 to develop and provide housing for use by farmworkers and their families are not subject to this agricultural conservation easement requirement. <table><tr><th>General Plan Land Use Designation</th><th>Important Farmland Inventory Classification Category</th><th>Acres Lost</th></tr><tr><td rowspan="3">Agricultural</td><td>Prime/Statewide</td><td>5</td></tr><tr><td>Unique</td><td>10</td></tr><tr><td>Local</td><td>15</td></tr></table>	General Plan Land Use Designation	Important Farmland Inventory Classification Category	Acres Lost	Agricultural	Prime/Statewide	5	Unique	10	Local	15	PROGRAM AG-O Establish an Agricultural Conservation Easement Discretionary projects that would result in direct and/or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table below shall ensure the permanent protection of offsite farmland of equal quality at a 1:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement. “Offsite” means an area that is outside of the project’s permit boundaries if applicable, would not be disturbed by the project with respect to agricultural soils or production, and that otherwise complies with the below-stated requirements. 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 to develop and provide housing for use by farmworkers and their families are not subject to this agricultural conservation easement requirement. <table><tr><th>General Plan Land Use Designation</th><th>Important Farmland Inventory Classification Category</th><th>Acres Lost</th></tr><tr><td rowspan="3">Agricultural</td><td>Prime/Statewide</td><td>5</td></tr><tr><td>Unique</td><td>10</td></tr><tr><td>Local</td><td>15</td></tr><tr><td rowspan="3">Open Space/Rural</td><td>Prime/Statewide</td><td>10</td></tr><tr><td>Unique</td><td>15</td></tr><tr><td>Local</td><td>20</td></tr><tr><td></td><td>Prime/Statewide</td><td>20</td></tr></table>	General Plan Land Use Designation	Important Farmland Inventory Classification Category	Acres Lost	Agricultural	Prime/Statewide	5	Unique	10	Local	15	Open Space/Rural	Prime/Statewide	10	Unique	15	Local	20		Prime/Statewide	20
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PROPOSED REVISIONS TO EIR MITIGATION MEASURE			PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY		
Open Space/Rural	Prime/Statewide	10	All <u>Other</u> Land Use Designations	Unique	30
	Unique	15		Local	40
	Local	20			
All <u>Other</u> Land Use Designations	Prime/Statewide	20	If the Planning Division, in consultation with the Department of Agriculture/Weights & Measures, determines that a discretionary project would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table above, the project applicant shall <u>be required to</u> prepare and submit a report for the review and approval of the Planning Division, in consultation with the Department of Agriculture/Weights & Measures. <u>The report shall identify which identifies</u> 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 <u>offsite</u> agricultural conservation easement may be considered in order to meet the required number of acres. The applicant <u>shall also may be required to</u> deposit funds with the County to contract with a qualified third-party agricultural economic consultant to review and advise the Planning Division and <u>Agricultural Commissioner Department of Agriculture/Weights & Measures</u> regarding the establishment and implementation of the agricultural conservation easement(s). The contents of the report shall be determined, reviewed, and approved by the Planning Division in consultation with the <u>Agricultural Commissioner Department of Agriculture/Weights & Measures</u> (hereafter referred to as the “reviewing agencies”), and shall include information necessary for the reviewing agencies and a qualified entity responsible for holding the <u>agricultural</u> conservation easement (e.g., a If the Planning Division, in consultation with the Department of Agriculture/Weights & Measures, determines that a discretionary project would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table above, the project applicant shall <u>be required to</u> prepare and submit a report for the review and approval of the Planning Division, in consultation with the Department of Agriculture/Weights & Measures. <u>The report shall identify which identifies</u> 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 <u>offsite</u> agricultural conservation easement may be considered in order to meet the required number of acres. The applicant <u>shall also may be required to</u> deposit funds with the County to contract with a qualified third-party agricultural economic consultant to review and advise the Planning Division and 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 Planning Division in consultation with the 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 <u>agricultural</u> 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 County of Ventura unincorporated area, 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		
	Unique	30			
	Local	40			

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
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 County of Ventura unincorporated area, 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 <u>Additional requirements may include provisions</u> for annual monitoring by the qualified entity or its representative to ensure adherence to the terms of the <u>agricultural</u> conservation easement. Project applicants are responsible for all costs incurred by the County and the qualified entity to successfully implement this mitigation measure. Proof of the successful establishment of an agricultural conservation easement shall be provided to the Planning Division prior to issuance of a zoning clearance for <u>the</u> inauguration of the project.	the reviewing agencies in consultation with a<u>the</u> 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 <u>Additional requirements may include provisions</u> for annual monitoring by the qualified entity or its representative to ensure adherence to the terms of the <u>agricultural</u> conservation easement. Project applicants are responsible for all costs incurred by the County and the qualified entity to successfully implement this mitigation measure. Proof of the successful establishment of an agricultural conservation easement shall be provided to the Planning Division prior to issuance of a zoning clearance for <u>the</u> inauguration of the project.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
CUL-1b New Implementation Program COS-X: Cultural Records Research The County shall include the following new implementation program in the 2040 General Plan. Implementation Program COS-X: Cultural Records Research As part of a discretionary application process, project applicants (Ventura County for County projects) <u>the County</u> shall initiate a records search and Sacred Lands File search with the South Central Coastal Information Center.	PROGRAM COS-HH Cultural Records Research As part of a discretionary application process, project applicants (Ventura County for County projects) <u>the County</u> shall initiate a records search and Sacred Lands File search with the South Central Coastal Information Center.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
CUL-1c New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures The County shall include the following new implementation program in the 2040 General Plan. Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures. For discretionary projects, the County shall require the following: • Projects shall be designed to protect existing resources and shall avoid potential impacts to the maximum extent feasible¹. • If determined necessary by the County, an archaeological or paleontological and/or Native American monitor shall be retained to monitor ground-disturbing activities during construction. • If any materials or artifacts are discovered during ground disturbance and/or construction activities, construction shall halt until a qualified archaeologistarchaeological consultant that meets the qualification standards included in Article 19 of the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation, paleontologist, or Native American monitor can access the discovery. A report or memorandum shall be prepared by the qualified monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources. Recommendations or mitigation identified by the qualified monitor shall be implemented if deemed feasible by the County prior to commencing or continuing project activities and/or construction. 1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is	PROGRAM COS-II Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures For discretionary projects, the County shall require the following: • Projects shall be designed to protect existing resources and shall avoid potential impacts to the maximum extent feasible¹. • If determined necessary by the County, an archaeological or paleontological and/or Native American monitor shall be retained to monitor ground-disturbing activities during construction. • If any materials or artifacts are discovered during ground disturbance and/or construction activities, construction shall halt until a qualified archaeologistarchaeological consultant that meets the qualification standards included in Article 19 of the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation, paleontologist, or Native American monitor can access the discovery. A report or memorandum shall be prepared by the qualified monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources. Recommendations or mitigation identified by the qualified monitor shall be implemented if deemed feasible by the County prior to commencing or continuing project activities and/or construction. 1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of "feasible" set forth in CEQA (Pub. Res. Code, § 210616.1) and the

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future-projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 210616.1) and the CEQA Guidelines (§ 153464). The County shall be solely responsible for making this feasibility determination in accordance with CEQA. or continuing project activities and/or construction.	CEQA Guidelines (§ 153464). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
CUL-2 Revised Policy COS-4.7: Cultural Heritage Board Review The County shall include the following revised policy in the 2040 General Plan. Policy COS-4.7: Cultural Heritage Board Review Prior to environmental review of discretionary development projects, the County shall initiate a records search request with the South Central Coastal Information Center and coordinate with the Cultural Heritage Board <u>staff</u> to identify sites of potential archaeological, historical, tribal-cultural and paleontological significance, to ensure that all known <u>historic</u> resources have been properly identified. Should a site of archaeological, tribal, architectural, or historical significance be identified, the County shall provide an opportunity for the Cultural Heritage Board to include recommendations specific to the discretionary project and identified resource(s). If it is determined during the review that a site has potential archaeological, tribal, architectural, or historical significance, information shall be provided to the County Cultural Heritage Board for evaluation. Recommendations identified by the Cultural Heritage Board shall be provided to the appropriate decision-making body. <u>County agency responsible for administering the project. Ultimate authority for the development of mitigation measures shall remain in the discretion of the County agency responsible for administering the project in consultation with Cultural Heritage Board staff.</u>	POLICY COS-4.7 Cultural Heritage Board Review Prior to environmental review of discretionary development projects, the County shall initiate a records search request with the South Central Coastal Information Center and coordinate with the Cultural Heritage Board <u>staff</u> to identify sites of potential archaeological, historical, tribal-cultural and paleontological significance, to ensure that all known <u>historic</u> resources have been properly identified. Should a site of archaeological, tribal, architectural, or historical significance be identified, the County shall provide an opportunity for the Cultural Heritage Board to include recommendations specific to the discretionary project and identified resource(s). If it is determined during the review that a site has potential archaeological, tribal, architectural, or historical significance, information shall be provided to the County Cultural Heritage Board for evaluation. Recommendations identified by the Cultural Heritage Board shall be provided to the appropriate decision-making authority. <u>County agency responsible for administering the project. Ultimate authority for the development of mitigation measures shall remain in the discretion of the County agency responsible for administering the project in consultation with Cultural Heritage Board staff.</u>

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
CUL-3 New Implementation Program COS-X: Project-Level Historic Surveys and Protection of Historic Resources The County shall include the following new Implementation Program COS-X in the 2040 General Plan. Implementation Program COS-X: Project-Level Historic Surveys and Protection of Historic Resources During project-specific environmental development<u>project applications</u>, the County shall define the project's area of potential effect for historic buildings and structures. The County shall determine the potential for the project to result in historicalal resource impacts, based on the extent of ground disturbance and site modification anticipated for the project. The potential for adverse impacts to historicalal resources shall also be determined pursuant to the requirements and protocol set forth in the Ventura County ISAG<u>Initial Study Assessment Guidelines</u> and Cultural Heritage Board Ordinance. Before altering <u>a building or structure</u>, or otherwise affecting <u>a site containing</u> a building or structure 50 years old or older, the project applicant shall <u>consult with Cultural Heritage Board (CHB) staff and, if deemed necessary, retain a qualified</u>architectural historian according to 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 record it on <u>complete</u> a California Department of Parks and Recreation (DPR) 523 fForm or equivalent documentation, if the building <u>or structure</u> has not previously been evaluated. Its-The building or structure's significance shall be assessed by a-the <u>qualified</u>architectural historian, professional using the significance criteria set forth for historicalal resources under CEQA Guidelines Section 15064.5 <u>when completing DPR Form 523</u>. The evaluation process shall include the development of appropriate	PROGRAM COS-JJ Project-Level Historic Surveys and Protection of Historic Resources During project-specific environmental development<u>project applications</u>, the County shall define the project's area of potential effect for historic buildings and structures. The County shall determine the potential for the project to result in historicalal resource impacts, based on the extent of ground disturbance and site modification anticipated for the project. The potential for adverse impacts to historicalal resources shall also be determined pursuant to the requirements and protocol set forth in the Ventura County ISAG<u>Initial Study Assessment Guidelines</u> and Cultural Heritage Board Ordinance. Before altering <u>a building or structure</u>, or otherwise affecting <u>a site containing</u> a building or structure 50 years old or older, the project applicant shall <u>consult with Cultural Heritage Board (CHB) staff and, if deemed necessary, retain a qualified</u>architectural historian according to 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 record it on <u>complete</u> a California Department of Parks and Recreation (DPR) 523 fForm or equivalent documentation, if the building <u>or structure</u> has not previously been evaluated. Its-The building or structure's significance shall be assessed by a-the <u>qualified</u>architectural historian, professional using the significance criteria set forth for historicalal resources under CEQA Guidelines Section 15064.5 <u>when completing DPR Form 523</u>. 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. <u>The County agency responsible for administering the project 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</u>

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
historical background research as context for the assessment of the significance of the structure in the county and the region. <u>The County agency responsible for administering the project 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 (Public Resources Code) PRC Section 5024.1 or the CEQA Guidelines Section 15064.5.</u> For buildings or structures that do not meet these PRC 5024.1 or the CEQA criteria for historical resource, no further mitigation is required. <u>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.</u> - 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 <u>with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.</u> <u>If the County determines</u> that preservation and reuse of the historical resource is not feasible¹, or the impact resulting from demolition or destruction cannot be fully mitigatedIf a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, the County shall ensure that a <u>qualified professional</u>qualified architectural historian thoroughly documents the building and associated landscape and setting. Documentation shall include still and video photography and a written documentary record/history of the building to the standards of the Historic American Building	<u>historical resource under Public Resources Code) PRC Section 5024.1 or the CEQA Guidelines Section 15064.5.</u> For buildings or structures that do not meet these PRC 5024.1 or the CEQA criteria for historical resource, no further mitigation is required. <u>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.</u> - 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 <u>with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.</u> <u>If the County determines</u> that preservation and reuse of the historical resource is not feasible¹, or the impact resulting from demolition or destruction cannot be fully mitigatedIf a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, the County shall ensure that a <u>qualified professional</u>qualified architectural historian thoroughly documents the building and associated landscape and setting. Documentation shall include still and video photography and a written documentary record/history of the building to the standards of the Historic American Building Survey or Historic American Engineering Record, including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. The record shall be prepared in consultation with State Historic Preservation Officer and filed with the Office of Historic Preservation. Incorporation of new

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
Survey or Historic American Engineering Record, including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. The record shall be prepared in consultation with State Historic Preservation Officer and filed with the Office of Historic Preservation. <u>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.</u> 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. <u>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 the State Historic Preservation Officer and filed with the Office of Historic Preservation.</u> 4. If preservation and reuse at the site are not feasible¹, the historical building shall be documented as described in item (2) and, when physically and financially feasible¹, be moved and preserved or reused. 5. If, in the opinion of the qualified architectural historian, the nature and significance of the building is such that its demolition or destruction cannot be fully mitigated through documentation, the County shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications to the proposed project that would allow the structure to be preserved intact. These could include project redesign, relocation or abandonment. If no such measures are feasible¹, the historical building shall be documented as described in item (2). 1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to	<u>technology and interpretive programming may also be used to document the historical resource proposed for major alteration, renovation, relocation, and/or demolition.</u> 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. <u>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 the State Historic Preservation Officer and filed with the Office of Historic Preservation.</u> 4. If preservation and reuse at the site are not feasible¹, the historical building shall be documented as described in item (2) and, when physically and financially feasible¹, be moved and preserved or reused. 5. If, in the opinion of the qualified architectural historian, the nature and significance of the building is such that its demolition or destruction cannot be fully mitigated through documentation, the County shall reconsider project plans in light of the high value of the resource, and implement more substantial modifications to the proposed project that would allow the structure to be preserved intact. These could include project redesign, relocation or abandonment. If no such measures are feasible¹, the historical building shall be documented as described in item (2). 1. "Feasible" means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 210661¹) and the CEQA Guidelines (§ 1543³64). The County shall be solely responsible for making this feasibility determination in accordance with CEQA. or continuing project activities and/or construction.	“feasible” set forth in CEQA (Pub. Res. Code, § 210661¹) and the CEQA Guidelines (§ 1543³64). The County shall be solely responsible for making this feasibility determination in accordance with CEQA. or continuing project activities and/or construction.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
NOI-3 New Implementation Program HAZ-X: Revise the Construction Noise Threshold Criteria and Control PlanNoise and Vibration Assessment Guidelines The County shall include the following new implementation program in the 2040 General Plan. Implementation Program HAZ-X: Revise the Construction Noise Threshold Criteria and Control PlanNoise and Vibration Assessment Guidelines The County shall revise the Construction Noise Threshold Criteria and Control PlanNoise and Vibration Assessment Guidelines within one year of 2040 General Plan adoption to consider all potential vibration-inducing activities and include various measures, setback distances, precautions, monitoring programs, and alternative methods to traditional construction activities with the potential to result in structural damage or excessive ground-borne noise. Items that shall be addressed in the planNoise and Vibration Assessment Guidelines include, but are not limited to, the following: • Ground vibration-producing activities, such as pile driving and blasting, shall be limited to the daytime hours between 7:00 a.m. to 7:00 p.m. on weekdays or 9:00 a.m. to 7:00 p.m. on weekends and holidays. Adverse effects can be avoided if pile driving is not scheduled for times at which vibration could disturb equipment or people. • If pile driving is used, pile holes shall be predrilled to the maximum feasible depth to reduce the number of blows required to seat a pile. Predrilling a hole for a pile can be used to place the pile at or near its ultimate depth, thereby eliminating most or all impact driving. • All construction equipment on construction sites shall be operated as far away from vibration-sensitive sites as reasonably possible.	PROGRAM HAZ-CC Revise the Construction Noise Threshold Criteria and Control PlanNoise and Vibration Assessment Guidelines The County shall revise the Construction Noise Threshold Criteria and Control PlanNoise and Vibration Assessment Guidelines within one year of 2040 General Plan adoption to consider all potential vibration-inducing activities and include various measures, setback distances, precautions, monitoring programs, and alternative methods to traditional construction activities with the potential to result in structural damage or excessive ground-borne noise. Items that shall be addressed in the planNoise and Vibration Assessment Guidelines include, but are not limited to, the following: • Ground vibration-producing activities, such as pile driving and blasting, shall be limited to the daytime hours between 7:00 a.m. to 7:00 p.m. on weekdays or 9:00 a.m. to 7:00 p.m. on weekends and holidays. Adverse effects can be avoided if pile driving is not scheduled for times at which vibration could disturb equipment or people. • If pile driving is used, pile holes shall be predrilled to the maximum feasible depth to reduce the number of blows required to seat a pile. Predrilling a hole for a pile can be used to place the pile at or near its ultimate depth, thereby eliminating most or all impact driving. • All construction equipment on construction sites shall be operated as far away from vibration-sensitive sites as reasonably possible. • Earthmoving, blasting and ground-impacting operations shall be phased so as not to occur simultaneously in areas close to sensitive receptors, to the extent feasible. The total vibration level produced could be significantly less when each vibration source is operated at separate times.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
• Earthmoving, blasting and ground-impacting operations shall be phased so as not to occur simultaneously in areas close to sensitive receptors, to the extent feasible. The total vibration level produced could be significantly less when each vibration source is operated at separate times. • Minimum setback requirements for different types of ground vibration-producing activities (e.g., pile driving and blasting) for the purpose of preventing damage to nearby structures shall be established. Factors to be considered include the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the fragility/resiliency of the nearby structures. Established setback requirements (i.e., 100 feet <u>as determined by the CEQA analysis, if applicable</u>) can be breached if a project-specific, site specific analysis is conducted by a qualified geotechnical engineer or ground vibration specialist that indicates that no structural damage would occur at nearby buildings or structures. • Minimum setback requirements for different types of ground vibration producing activities (e.g., pile driving and blasting) for the purpose of preventing negative human response shall be established based on the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the type of sensitive receptor. Established setback requirements (i.e., 300 feet <u>as determined by the CEQA analysis, if applicable</u>) can be breached only if a project-specific, site-specific, technically adequate ground vibration study indicates that the buildings would not be exposed to ground vibration levels in excess of 80 VdB, and ground vibration measurements performed during the construction activity confirm that the buildings are not being exposed to levels in excess of 80 VdB. • All vibration-inducing activity within the distance parameters described above <u>determined by the CEQA analysis</u> shall be monitored and documented for ground vibration noise and vibration noise levels at the nearest sensitive land use and	• Minimum setback requirements for different types of ground vibration-producing activities (e.g., pile driving and blasting) for the purpose of preventing damage to nearby structures shall be established. Factors to be considered include the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the fragility/resiliency of the nearby structures. Established setback requirements (i.e., 100 feet <u>as determined by the CEQA analysis, if applicable</u>) can be breached if a project-specific, site specific analysis is conducted by a qualified geotechnical engineer or ground vibration specialist that indicates that no structural damage would occur at nearby buildings or structures. • Minimum setback requirements for different types of ground vibration producing activities (e.g., pile driving and blasting) for the purpose of preventing negative human response shall be established based on the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the type of sensitive receptor. Established setback requirements (i.e., 300 feet <u>as determined by the CEQA analysis, if applicable</u>) can be breached only if a project-specific, site-specific, technically adequate ground vibration study indicates that the buildings would not be exposed to ground vibration levels in excess of 80 VdB, and ground vibration measurements performed during the construction activity confirm that the buildings are not being exposed to levels in excess of 80 VdB. • All vibration-inducing activity within the distance parameters described above <u>determined by the CEQA analysis</u> shall be monitored and documented for ground vibration noise and vibration noise levels at the nearest sensitive land use and associated recorded data submitted to Ventura County so as not to exceed the recommended FTA levels. • Alternatives to traditional pile driving (e.g., sonic pile driving, jetting, cast-in-place or auger cast piles, non-displacement piles, pile cushioning, torque or hydraulic piles) shall be

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
associated recorded data submitted to Ventura County so as not to exceed the recommended FTA levels. Alternatives to traditional pile driving (e.g., sonic pile driving, jetting, cast-in-place, or auger cast piles, non-displacement piles, pile cushioning, torque or hydraulic piles) shall be considered and implemented where feasible¹ to reduce vibration levels. 1 “Feasible” means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 210616.1) and the CEQA Guidelines (§ 153164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.	considered and implemented where feasible¹ to reduce vibration levels. 1 “Feasible” means that this mitigation measure shall be applied to future discretionary projects under the 2040 General Plan when and to the extent it is “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such future projects based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 210616.1) and the CEQA Guidelines (§ 153164). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

CHAPTER 3 CEQA ADDENDUM REVIEW AND SCOPE

3.1 Purpose

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

3.2 Review and Action

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

3.3 Scope of Evaluation

As summarized in Chapter 2 Project Description, the proposed updates would incorporate revisions to implementation programs recommended by, and those policies included in, the 2040 General Plan EIR.

CHAPTER 4 Impact Evaluation

4.1 Impact Evaluation Overview

As previously stated in Section 1.4, the proposed General Plan Amendments include minor text revisions and updates to several General Plan programs and policies and associated mitigation measures as detailed in Section 2.2, specifically Table 1. All of the updates were completed to improve clarity, reduce potential ambiguity, and if applicable, update County processes and procedures to implement these programs and policies. None of these updates result in any new significant environmental impact or a substantial increase in the severity of a previously identified significant environmental impact as analyzed in the 2040 General Plan EIR.

Given these circumstances, the impact evaluation analyzes the minor updates by the specific issue area topics that are included in the General Plan EIR. This analysis reinforces why the proposed updates are minor and that the Project would not result in any new significant environmental impacts that were not previously addressed in the certified 2040 General Plan EIR.

4.2 Impact Evaluation Analysis

4.2.1 Air Quality General Plan Program and EIR Mitigation Measure Amendments

General Plan Program HAZ-Y and Mitigation Measure AQ-1b – Construction Air Pollutant Best Management Practices.

The minor wording updates provide a more precise threshold for the types of projects that need to include specific types of emission reduction measures. The updates provide a specific reference to the quantitative threshold that applies to projects in the Ventura County Air Pollution Control District's Air Quality Assessment Guidelines where specific construction mitigation measures would apply.

Impact Conclusion: This update clarifies the specific threshold where mitigation would be required, which improves the ability to analyze projects. It is a positive change that provides clarity and does not create a new significant impact.

The other wording updates relating to the definition of "feasible" are also not substantive. The deletions are eliminating redundant text (refers to applying to future discretionary projects) which detracts from the intended definition. This does not create a new significant impact.

4.2.2 Agriculture & Forestry General Plan Policy and EIR Mitigation Measure Amendments

There are two separate updates included in the Agriculture & Forestry issue area:

1. General Plan Policy AG-1.8 and Mitigation Measure AG-1 – Avoid Development on Agricultural Land

The only update to this General Plan policy and mitigation measure is a wording modification from "as much as feasibly possible" to "the extent feasible" that is clearer but does not affect the policy intent.

2. General Plan Program AG-O and Mitigation Measure AG-2 – Establish an Agricultural Conservation Easement

The most substantive update to this General Plan program and mitigation measure is to allow an alternative method for providing an “offsite” agricultural easement to mitigate the loss of Important Farmland with a development proposal. The alternative method to providing an “offsite” agricultural easement is to allow area on the same property as the development proposal to be placed in an agricultural conservation easement. The added wording is: “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.”

The addition of the words “where feasible” acknowledges that not all sites may have the available acreage on the development site itself to provide the required acreage of Important Farmland as mitigation but provides an option to preserving agricultural land.

Impact Conclusion: Since either an onsite or offsite conservation easement can mitigate the loss of Important Farmland, the wording update does not create a new significant impact.

Other minor wording updates are not substantive, such as updating the name of the reviewing agency from “Agricultural Commissioner” to “Department of Agriculture/Weights & Measures” to reflect the correct name of the agency.

4.2.3 Historical, Archaeological, & Paleontological Resources General Plan Programs and Policies, and EIR Mitigation Measure Amendments

There are four separate updates included in the Historical, Archaeological, & Paleontological Resources issue area:

1. General Plan Policy COS-4.7 and Mitigation Measure CUL-2 – Cultural Heritage Board Review

The update to this General Plan policy and mitigation measure is focused on clarifying the review process for projects with identified historical resources, specifically the role of the Cultural Heritage Board (CHB). The updated language notes that the County will coordinate with CHB staff early on in reviewing a project with potential historical resources to ensure that all known historical resources have been properly identified. If it is determined that the project site contains historical resources, then the County shall provide an opportunity for the CHB to provide recommendations specific to the discretionary project and identified resource(s).

The updated language clarifies that recommendations from the CHB shall be provided to the County agency responsible for administering the project but that the ultimate authority for development of mitigation measures shall remain in the discretion of the responsible County agency. The updated wording reinforces that the role of the CHB is advisory but not discretionary. Another important component of the updated wording is that deletions were made to clarify that certain cultural resource evaluations related to archaeological, tribal cultural, and paleontological resources are not included in the CHB’s purview. These resources are subject to detailed technical analyses summarized in CEQA documents, which may involve consultation with appropriate regulatory agencies and other reviewing entities such as tribal groups.

Impact Conclusion: This update clarifies the project review process, which improves the ability to analyze projects. It is a positive change that provides clarity and does not create a new significant impact.

2. General Plan Program COS-HH and Mitigation Measure CUL-1b – Cultural Records Search

The only update to this General Plan program and mitigation measure is a minor wording modification from “project applicants (Ventura County for County projects)” to “the County”. The update to “the County” is a universal update throughout amended sections. The update also clarifies that it is the County, and not the project applicant that initiates the records search with the South Central Coastal Information Center.

3. General Plan Program COS-II and Mitigation Measure CUL-1c – Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures

Two minor updates are included in the third bullet of this General Plan program and mitigation measure which deals with cultural resource discoveries during construction, and the need to stop construction and call a qualified professional to evaluate and provide a course of action. One of the updates is a minor wording modification from “archaeologist” to “archaeological consultant”. This edit is to provide flexibility for a range of qualified cultural resource specialists that may fall under the title of archaeological consultant that could assess a resource discovery in the field.

The other text modification is to add the qualifier language “if deemed feasible by the County” to implementing the recommendations or mitigation identified by the qualified monitor prior to commencing or continuing project activities and/or construction. This language provides for some discretion and flexibility to County staff in determining the reasonableness of professional recommendations given extenuating circumstances.

Impact Conclusion: This update clarifies a protocol for County staff to follow in a situation where field discoveries are made that halt construction until the resources are evaluated. The protocol improves the ability of the County to handle these situations when they arise. It is a positive change that provides clarity and does not create a new significant impact.

4. General Plan Program COS-JJ and Mitigation Measure CUL-3 - Project-Level Historic Surveys and Protection of Historic Resources

The update to this General Plan program and mitigation measure is focused on clarifying treatment options for development sites with buildings and structures 50 years old or older. Guidance notes that an applicant with a development project that contains a building or structure 50 years old or older shall consult with CHB staff and, if deemed necessary, retain a qualified professional to properly assess the building’s significance. The County would then consult with CHB staff to determine, based on the findings of the qualified professional, whether the building or structure meets the criteria for a historical resource under PRC Section 5024.1 or CEQA Guidelines Section 15064.5.

The guidance then lays out the potential mitigation options for sites with significant historical resources, which include:

- Keeping the significant historical resource preserved intact.

- Modifying the significant historical resource consistent 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 County 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 County shall ensure that a qualified professional thoroughly documents the building, associated landscape, and setting.

Impact Conclusion: The updated language clarifies the process to determine whether a building or structure on a project site is a significant historical resource. The guidance identifies the qualified professional needed to make the assessment of significance and identifies a hierarchy of preservation options. This update clarifies a project review process, which improves the ability to analyze projects. It is a positive change that provides clarity to the review process and does not create a new significant impact.

4.2.4 Noise & Vibration General Plan Program and EIR Mitigation Measure Implementation Program Amendments

General Plan Program HAZ-CC and Mitigation Measure NOI-3 – Revise the Construction Noise and Control Plan

This program requires the County to revise its Construction Noise Threshold Criteria and Control Plan within one year of 2040 General Plan adoption to include guidance about potential noise and vibration-inducing activities, and include various measures, setback distances, precautions, monitoring programs, and alternative methods to traditional construction activities that may result in structural damage or excessive ground-borne noise. The updates to the program and mitigation measure are minor, which include renaming the Construction Noise Threshold Criteria and Control Plan to the Noise and Vibration Assessment Guidelines (NVAG). The updates are instructive to County staff's review process as outlined in the NVAG to minimize potential noise and vibration impacts.

There are three proposed updates that would be included in the NVAG related to pile driving and other ground vibration producing activities during construction which are common sources of noise and vibration impacts:

1. Ground vibration producing activities are limited to daytime hours between 7:00 a.m. to 7:00 p.m. on weekdays and 9:00 a.m. to 7:00 p.m. on weekends. The proposed updates recommend that potential adverse impacts of pile driving be reduced by scheduling the pile driving activity at times when vibration would not disturb equipment or people.
2. Wording is added to existing language about pile driving to reinforce the benefits of predrilling a hole for a pile at or near its ultimate depth and eliminating most or all impact driving.
3. Instead of specific distances being called out for setbacks, updates are proposed to rely on the specific setback requirements included in the project's impact analysis as recommended by the qualified geotechnical engineer.

Impact Conclusion: The updates to General Plan Program HAZ-CC and Mitigation Measure NOI-3 are intended to clarify applicable mitigation strategies to reduce vibration impacts associated with construction practices and tools. The proposed clarifying updates improve the ability of County staff to analyze projects. As noted previously, there is specific language in the

General Plan that anticipates and mandates that these updates would be made. It is a positive change which provides clarity and does not create a new significant impact.

CHAPTER 5 PRIMARY DOCUMENTS REVIEWED AND REFERENCES

Ventura County 2040 General Plan.

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

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

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

Ventura County Coastal and Non-Coastal Zoning Ordinances.

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

APPENDIX A

Table 2 – Clean Draft of Proposed General Plan Program/Policy & EIR Amendments

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
AQ-1b New Implementation Program HAZ-X: Construction Air Pollutant Best Management Practices The County shall include the following new implementation program in the 2040 General Plan. Implementation Program HAZ-X: Construction Air Pollutant Best Management Practices Discretionary development projects that may generate construction-related criteria pollutant emissions above the Air Quality Assessment Guidelines quantitative criteria pollutant threshold for project operations shall be required to include the following types of emission reduction measures and potentially others, as recommended by VCAPCD in its Air Quality Assessment Guidelines 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 feasible¹, using electric-powered or other alternative fueled equipment in place of diesel powered equipment. 1. “Feasible” means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such project based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 21061.1) and the CEQA Guidelines section (§ 15364). The County shall be solely	PROGRAM HAZ-Y Construction Air Pollutant Best Management Practices Discretionary development projects that may generate construction-related criteria pollutant emissions above the Air Quality Assessment Guidelines quantitative criteria pollutant threshold for project operations shall be required to include the following types of emission reduction measures and potentially others, as recommended by VCAPCD in its Air Quality Assessment Guidelines 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 feasible² using electric-powered or other alternative fueled equipment in place of diesel powered equipment. 2. “Feasible” means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such project based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 21061.1) and the CEQA Guidelines section (§ 15364). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
responsible for making this feasibility determination in accordance with CEQA.	

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
AG-1 New Policy AG-X: Avoid Development on Agricultural Land The County shall include the following new policy in the 2040 General Plan. Policy AG-X: Avoid Development on Agricultural Land The County shall ensure that discretionary development located on land identified as Important Farmland on the State's Important Farmland Inventory shall be conditioned to avoid direct loss of Important Farmland to the extent feasible.	POLICY AG-1.8 Avoid Development on Agricultural Land The County shall ensure that discretionary development located on land identified as Important Farmland on the State's Important Farmland Inventory shall be conditioned to avoid direct loss of Important Farmland to the extent feasible.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY																																									
AG-2 New Implementation Program AG-X: Establish an Agricultural Conservation Easement The County shall include the following new implementation program in the 2040 General Plan. Implementation Program AG-X: Establish an Agricultural Conservation Easement Discretionary projects that would result in direct and/or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table below shall ensure the permanent protection of offsite farmland of equal quality at a 1:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement. “Offsite” means an area that is outside of the project’s permit boundaries if applicable, would not be disturbed by the project with respect to agricultural soils or production, and that otherwise complies with the below-stated requirements. 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 to develop and provide housing for use by farmworkers and their families are not subject to this agricultural conservation easement requirement. <table><tr><th>General Plan Land Use Designation</th><th>Important Farmland Category</th><th>Acres Lost</th></tr><tr><td rowspan="3">Agricultural</td><td>Prime/Statewide</td><td>5</td></tr><tr><td>Unique</td><td>10</td></tr><tr><td>Local</td><td>15</td></tr><tr><td rowspan="3">Open Space/Rural</td><td>Prime/Statewide</td><td>10</td></tr><tr><td>Unique</td><td>15</td></tr><tr><td>Local</td><td>20</td></tr></table>	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	PROGRAM AG-O Establish an Agricultural Conservation Easement Discretionary projects that would result in direct and/or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table below shall ensure the permanent protection of offsite farmland of equal quality at a 1:1 ratio (acres preserved: acres converted) through the establishment of an offsite agricultural conservation easement. “Offsite” means an area that is outside of the project’s permit boundaries if applicable, would not be disturbed by the project with respect to agricultural soils or production, and that otherwise complies with the below-stated requirements. 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 to develop and provide housing for use by farmworkers and their families are not subject to this agricultural conservation easement requirement. <table><tr><th>General Plan Land Use Designation</th><th>Important Farmland Category</th><th>Acres Lost</th></tr><tr><td rowspan="3">Agricultural</td><td>Prime/Statewide</td><td>5</td></tr><tr><td>Unique</td><td>10</td></tr><tr><td>Local</td><td>15</td></tr><tr><td rowspan="3">Open Space/Rural</td><td>Prime/Statewide</td><td>10</td></tr><tr><td>Unique</td><td>15</td></tr><tr><td>Local</td><td>20</td></tr><tr><td rowspan="3">All Other Land Use Designations</td><td>Prime/Statewide</td><td>20</td></tr><tr><td>Unique</td><td>30</td></tr><tr><td>Local</td><td>40</td></tr></table>	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
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PROPOSED REVISIONS TO EIR MITIGATION MEASURE			PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
All Other Land Use Designations	Prime/Statewide	20	If the Planning Division, in consultation with the Department of Agriculture/Weights & Measures, determines that a discretionary project would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table above, the project applicant shall be required to prepare and submit a report for the review and approval of the Planning Division, in consultation with the 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 may also be required to deposit funds with the County to contract with a qualified third-party agricultural economic consultant to review and advise the Planning Division and 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 Planning Division in consultation with the 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 County of Ventura unincorporated area, 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
	Unique	30	
	Local	40	
If the Planning Division, in consultation with the Department of Agriculture/Weights & Measures, determines that a discretionary project would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table above, the project applicant shall be required to prepare and submit a report for the review and approval of the Planning Division, in consultation with the 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 may also be required to deposit funds with the County to contract with a qualified third-party agricultural economic consultant to review and advise the Planning Division and 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 Planning Division in consultation with the 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 County of Ventura unincorporated area, 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			If the Planning Division, in consultation with the Department of Agriculture/Weights & Measures, determines that a discretionary project would result in direct or indirect loss of Important Farmland in exceedance of the acreage loss thresholds listed in the table above, the project applicant shall be required to prepare and submit a report for the review and approval of the Planning Division, in consultation with the 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 may also be required to deposit funds with the County to contract with a qualified third-party agricultural economic consultant to review and advise the Planning Division and 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 Planning Division in consultation with the 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 County of Ventura unincorporated area, 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. Additional requirements may include provisions for annual monitoring by the qualified entity or its

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
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. Additional requirements may include provisions for annual monitoring by the qualified entity or its representative to ensure adherence to the terms of the agricultural conservation easement. Project applicants are responsible for all costs incurred by the County and the qualified entity to successfully implement this mitigation measure. Proof of the successful establishment of an agricultural conservation easement shall be provided to the Planning Division prior to issuance of a zoning clearance for the inauguration of the project.	representative to ensure adherence to the terms of the agricultural conservation easement. Project applicants are responsible for all costs incurred by the County and the qualified entity to successfully implement this mitigation measure. Proof of the successful establishment of an agricultural conservation easement shall be provided to the Planning Division prior to issuance of a zoning clearance for the inauguration of the project.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
CUL-2 Revised Policy COS-4.7: Cultural Heritage Board Review The County shall include the following revised policy in the 2040 General Plan. Policy COS-4.7: Cultural Heritage Board Review Prior to environmental review of discretionary development projects, the County shall initiate a records search request with the South Central Coastal Information Center and coordinate with Cultural Heritage Board staff to identify sites of potential historic significance, to ensure that all known historic resources have been properly identified. Should a site of historic significance be identified, the County shall provide an opportunity for the Cultural Heritage Board to include recommendations specific to the discretionary project and identified resource(s). Recommendations identified by the Cultural Heritage Board shall be provided to the County agency responsible for administering the project. Ultimate authority for the development of mitigation measures shall remain in the discretion of the County agency responsible for administering the project in consultation with Cultural Heritage Board staff.	POLICY COS-4.7 Cultural Heritage Board Review Prior to environmental review of discretionary development projects, the County shall initiate a records search request with the South Central Coastal Information Center and coordinate with Cultural Heritage Board staff to identify sites of potential historic significance, to ensure that all known historic resources have been properly identified. Should a site of historic significance be identified, the County shall provide an opportunity for the Cultural Heritage Board to include recommendations specific to the discretionary project and identified resource(s). Recommendations identified by the Cultural Heritage Board shall be provided to the County agency responsible for administering the project. Ultimate authority for the development of mitigation measures shall remain in the discretion of the County agency responsible for administering the project in consultation with Cultural Heritage Board staff.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
CUL-1b New Implementation Program COS-X: Cultural Records Research The County shall include the following new implementation program in the 2040 General Plan. Implementation Program COS-X: Cultural Records Research As part of a discretionary application process, the County shall initiate a records search and Sacred Lands File search with the South Central Coastal Information Center.	PROGRAM COS-HH Cultural Records Research As part of a discretionary application process, the County shall initiate a records search and Sacred Lands File search with the South Central Coastal Information Center.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
CUL-1c New Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures The County shall include the following new implementation program in the 2040 General Plan. Implementation Program COS-X: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures. For discretionary projects, the County shall require the following: • Projects shall be designed to protect existing resources and shall avoid potential impacts to the maximum extent feasible¹. • If determined necessary by the County, an archaeological or paleontological and/or Native American monitor shall be retained to monitor ground-disturbing activities during construction. • If any materials or artifacts are discovered during ground disturbance and/or construction activities, construction shall halt until a qualified archaeological consultant that meets the qualification standards included in Article 19 of the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation, paleontologist, or Native American monitor can access the discovery. A report or memorandum shall be prepared by the qualified monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources. Recommendations or mitigation identified by the qualified monitor shall be implemented if deemed feasible by the County prior to commencing or continuing project activities and/or construction. 1. "Feasible" means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as	PROGRAM COS-II Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures For discretionary projects, the County shall require the following: • Projects shall be designed to protect existing resources and shall avoid potential impacts to the maximum extent feasible¹. • If determined necessary by the County, an archaeological or paleontological and/or Native American monitor shall be retained to monitor ground-disturbing activities during construction. • If any materials or artifacts are discovered during ground disturbance and/or construction activities, construction shall halt until a qualified archaeological consultant that meets the qualification standards included in Article 19 of the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation, paleontologist, or Native American monitor can access the discovery. A report or memorandum shall be prepared by the qualified monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources. Recommendations or mitigation identified by the qualified monitor shall be implemented if deemed feasible by the County prior to commencing or continuing project activities and/or construction. 1. "Feasible" means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" as determined by the County in the context of such project based on substantial evidence. This definition is consistent with the definition of "feasible" set forth in CEQA (Pub. Res. Code, § 21061.1) and the CEQA Guidelines (§ 15364). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
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PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
CUL-3 New Implementation Program COS-X: Project-Level Historic Surveys and Protection of Historic Resources The County shall include the following new Implementation Program COS-X in the 2040 General Plan. Implementation Program COS-X: Project-Level Historic Surveys and Protection of Historic Resources During project applications, the County shall define the project's area of potential effect for historic buildings and structures. The County shall determine the potential for the project to result in historical resource impacts, based on the extent of ground disturbance and site modification anticipated for the project. The potential for adverse impacts to historical resources shall also be determined pursuant to the requirements and protocol set forth in the Ventura County Initial Study Assessment Guidelines and Cultural Heritage Ordinance. 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 Cultural Heritage Board (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 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 County	PROGRAM COS-JJ Project-Level Historic Surveys and Protection of Historic Resources During project applications, the County shall define the project's area of potential effect for historic buildings and structures. The County shall determine the potential for the project to result in historical resource impacts, based on the extent of ground disturbance and site modification anticipated for the project. The potential for adverse impacts to historical resources shall also be determined pursuant to the requirements and protocol set forth in the Ventura County Initial Study Assessment Guidelines and Cultural Heritage Ordinance. 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 Cultural Heritage Board (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 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 County agency responsible for administering the project 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 (Public Resources Code) PRC Section 5024.1

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
agency responsible for administering the project 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 CEQA Guidelines Section 15064.5. For buildings or structures that do not meet these criteria, no further mitigation is required. 1. 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. 2. 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. 3. If the County determines that preservation and reuse of the historical resource is not feasible¹, or the impact resulting from demolition or destruction cannot be fully mitigated, the County 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,	or the CEQA Guidelines Section 15064.5. For buildings or structures that do not meet these criteria, no further mitigation is required. 1. 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. 2. 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. 3. If the County determines that preservation and reuse of the historical resource is not feasible¹, or the impact resulting from demolition or destruction cannot be fully mitigated, the County 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

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
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 the State Historic Preservation Officer and filed with the Office of Historic Preservation. 1. “Feasible” means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such project based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 21061.1) and the CEQA Guidelines (§ 15364). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.	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 the State Historic Preservation Officer and filed with the Office of Historic Preservation. 1. “Feasible” means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as determined by the County in the context of such project based on substantial evidence. This definition is consistent with the definition of “feasible” set forth in CEQA (Pub. Res. Code, § 21061.1) and the CEQA Guidelines (§ 15364). The County shall be solely responsible for making this feasibility determination in accordance with CEQA.

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
NOI-3 New Implementation Program HAZ-X: Revise the Noise and Vibration Assessment Guidelines The County shall include the following new implementation program in the 2040 General Plan. Implementation Program HAZ-X: Revise the Noise and Vibration Assessment Guidelines The County shall revise the Noise and Vibration Assessment Guidelines within one year of 2040 General Plan adoption to consider all potential vibration-inducing activities and include various measures, setback distances, precautions, monitoring programs, and alternative methods to traditional construction activities with the potential to result in structural damage or excessive ground-borne noise. Items that shall be addressed in the Noise and Vibration Assessment Guidelines include, but are not limited to, the following: • Ground vibration-producing activities, such as pile driving and blasting, shall be limited to the daytime hours between 7:00 a.m. to 7:00 p.m. on weekdays or 9:00 a.m. to 7:00 p.m. on weekends and holidays. Adverse effects can be avoided if pile driving is not scheduled for times at which vibration could disturb equipment or people. • If pile driving is used, pile holes shall be predrilled to the maximum feasible depth to reduce the number of blows required to seat a pile. Predrilling a hole for a pile can be used to place the pile at or near its ultimate depth, thereby eliminating most or all impact driving. • All construction equipment on construction sites shall be operated as far away from vibration-sensitive sites as reasonably possible.	PROGRAM HAZ-CC Revise the Noise and Vibration Assessment Guidelines The County shall revise the Noise and Vibration Assessment Guidelines within one year of 2040 General Plan adoption to consider all potential vibration-inducing activities and include various measures, setback distances, precautions, monitoring programs, and alternative methods to traditional construction activities with the potential to result in structural damage or excessive ground-borne noise. Items that shall be addressed in the Noise and Vibration Assessment Guidelines include, but are not limited to, the following: • Ground vibration-producing activities, such as pile driving and blasting, shall be limited to the daytime hours between 7:00 a.m. to 7:00 p.m. on weekdays or 9:00 a.m. to 7:00 p.m. on weekends and holidays. Adverse effects can be avoided if pile driving is not scheduled for times at which vibration could disturb equipment or people. • If pile driving is used, pile holes shall be predrilled to the maximum feasible depth to reduce the number of blows required to seat a pile. Predrilling a hole for a pile can be used to place the pile at or near its ultimate depth, thereby eliminating most or all impact driving. • All construction equipment on construction sites shall be operated as far away from vibration-sensitive sites as reasonably possible. • Earthmoving, blasting and ground-impacting operations shall be phased so as not to occur simultaneously in areas close to sensitive receptors, to the extent feasible. The total vibration level produced could be significantly less when each vibration source is operated at separate times. • Minimum setback requirements for different types of ground vibration-producing activities (e.g., pile driving and blasting) for

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
• Earthmoving, blasting and ground-impacting operations shall be phased so as not to occur simultaneously in areas close to sensitive receptors, to the extent feasible. The total vibration level produced could be significantly less when each vibration source is operated at separate times. • Minimum setback requirements for different types of ground vibration-producing activities (e.g., pile driving and blasting) for the purpose of preventing damage to nearby structures shall be established. Factors to be considered include the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the fragility/resiliency of the nearby structures. Established setback requirements (as determined by the CEQA analysis, if applicable) can be breached if a project-specific, site specific analysis is conducted by a qualified geotechnical engineer or ground vibration specialist that indicates that no structural damage would occur at nearby buildings or structures. • Minimum setback requirements for different types of ground vibration producing activities (e.g., pile driving and blasting) for the purpose of preventing negative human response shall be established based on the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the type of sensitive receptor. Established setback requirements (as determined by the CEQA analysis, if applicable) can be breached only if a project-specific, site-specific, technically adequate ground vibration study indicates that the buildings would not be exposed to ground vibration levels in excess of 80 VdB, and ground vibration measurements performed during the construction activity confirm that the buildings are not being exposed to levels in excess of 80 VdB. • All vibration-inducing activity within the distance parameters determined by the CEQA analysis shall be monitored and documented for ground vibration noise and vibration noise levels at the nearest sensitive land use and associated recorded data submitted to Ventura County so as not to exceed the recommended FTA levels.	the purpose of preventing damage to nearby structures shall be established. Factors to be considered include the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the fragility/resiliency of the nearby structures. Established setback requirements (as determined by the CEQA analysis, if applicable) can be breached if a project-specific, site specific analysis is conducted by a qualified geotechnical engineer or ground vibration specialist that indicates that no structural damage would occur at nearby buildings or structures. • Minimum setback requirements for different types of ground vibration producing activities (e.g., pile driving and blasting) for the purpose of preventing negative human response shall be established based on the specific nature of the vibration producing activity (e.g., type and duration of pile driving), local soil conditions, and the type of sensitive receptor. Established setback requirements (as determined by the CEQA analysis, if applicable) can be breached only if a project-specific, site-specific, technically adequate ground vibration study indicates that the buildings would not be exposed to ground vibration levels in excess of 80 VdB, and ground vibration measurements performed during the construction activity confirm that the buildings are not being exposed to levels in excess of 80 VdB. • All vibration-inducing activity within the distance parameters determined by the CEQA analysis shall be monitored and documented for ground vibration noise and vibration noise levels at the nearest sensitive land use and associated recorded data submitted to Ventura County so as not to exceed the recommended FTA levels. • Alternatives to traditional pile driving (e.g., sonic pile driving, jetting, cast-in- place, auger cast piles, non-displacement piles, pile cushioning, torque or hydraulic piles) shall be considered and implemented where feasible¹ to reduce vibration levels. ¹ “Feasible” means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” as

PROPOSED REVISIONS TO EIR MITIGATION MEASURE	PROPOSED UPDATES TO GENERAL PLAN PROGRAM OR POLICY
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