



# Ventura Ranch Farmworker Housing Complex

## CEQA Guidelines Section 15183 Exemption Checklist

*prepared by*

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**December 2025**

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# Statement of Reasons for Exemption from Additional Environmental Review and Project Description

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**Project Name:** Ventura Ranch Farmworker Housing Complex (project)

**Case No.:** PL23-0051

**APN(s):** 063-0-110-065, 063-0-110-035, 063-0-110-090, and 063-0-110-145

**Address:** 4884 North Ventura Avenue

**Lead Agency Name and Address:**

County of Ventura  
Resource Management Agency – Planning Division  
800 South Victoria Avenue  
Ventura, California 93009

**County Staff Contact:**

Michael Conger, Senior Planner  
Michael.Conger@venturacounty.gov  
(805) 654-5038

**Project Location:**

The approximately 83-acre project site is located at 4884 North Ventura Avenue (Assessor's Parcel Numbers [APNs] 063-0-110-065, -035, -090, and -145), east of Ventura Avenue and Floral Drive, in unincorporated Ventura County. The project would be developed on 19.8-acres within the overall 83-acre project site. The project site is located 3.62 miles north of the City of Ventura and is partially within the City's sphere of influence. The project site currently contains undeveloped open space, an orchard with associated accessory structures (e.g., barns and storage), and a single-family residence with a covered patio and detached garage. Single-family residential uses and open space are located to the north, undeveloped open space to the east, single-family and agricultural uses to the south, and State Route (SR) 33 to the west, across from which is vacant industrial land. Additionally, a water storage facility is fully surrounded by the project site but is not part of the project site. Figure 1 shows the regional project location, and Figure 2 shows an aerial view of the project site.

**Project Applicant Name and Address:**

Ventura Ranch Partners, LLC  
PO Box 6045  
Oxnard, CA 93030

**General Plan:** Land Use Designation: Open Space (OS) and ECU-Agriculture (ECU-A)

**Zoning:** Use Regulation: Open Space (OS) and Agricultural Exclusive (AE)

Figure 1 Regional Project Location



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★ Project Location

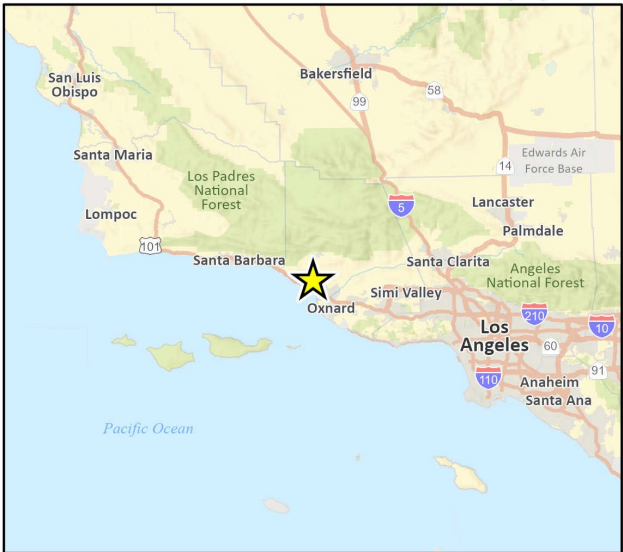
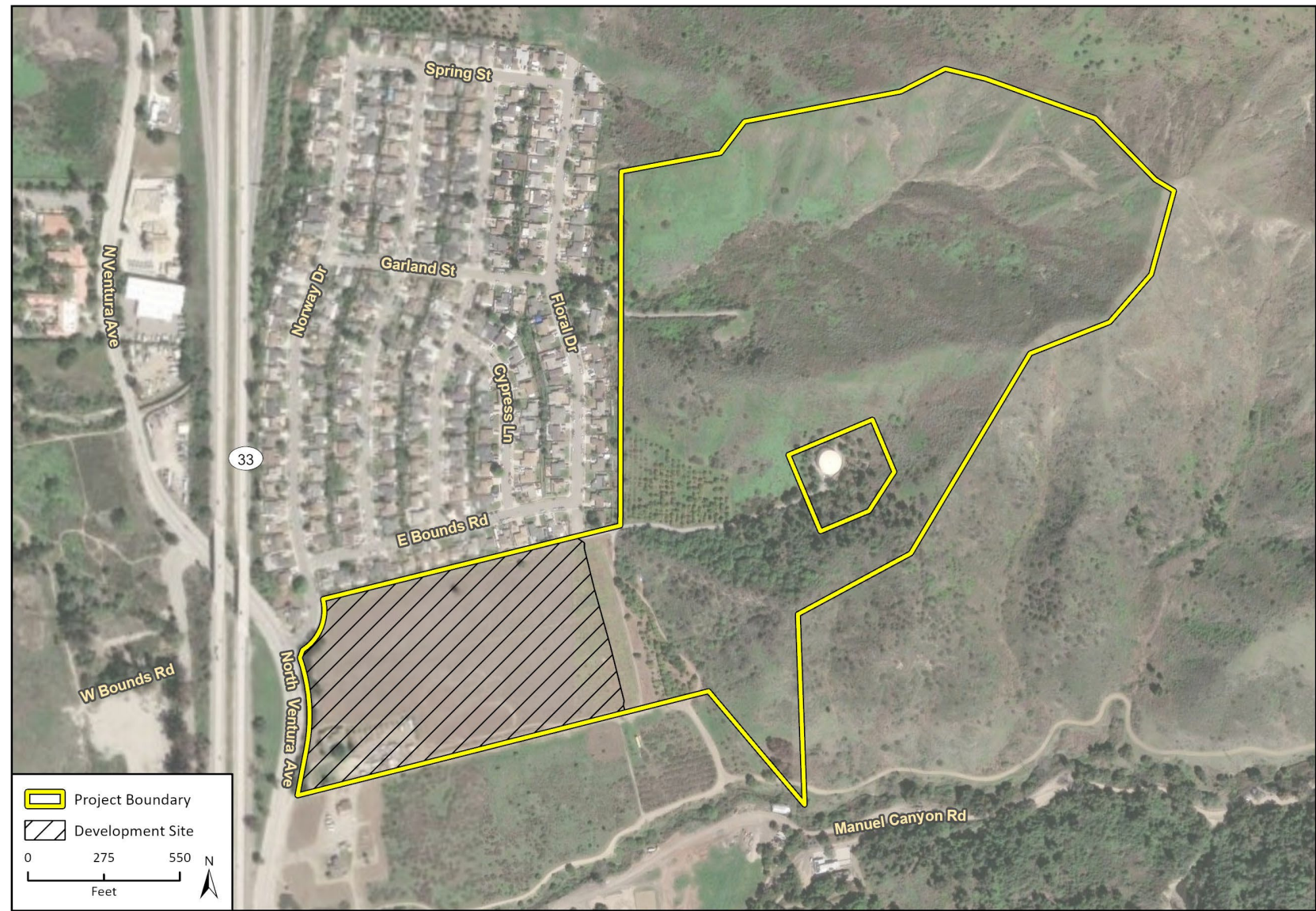




Figure 2 Project Site Location



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24-16460 EPS  
Fig 2 Project Location

## **Description of Project**

The project involves construction of a 328-unit farmworker housing complex. The project would 100 percent affordable, and units would be restricted to farmworkers who qualify as lower income, which is classified as individuals and families who make 80 percent of area median income and below. In addition, the project would set aside an approximately 63-acre conservation parcel (Parcel 4) that would be transferred to a Planning Director-approved conservation organization or public agency to remain open space in perpetuity. The housing complex would be constructed on the three remaining parcels (Parcels 1, 2, and 3) totaling 19.8-acres. The existing farmhouse on the project site would be demolished while the existing orchard would be retained on Parcel 4. The proposed parcels are illustrated in the Tentative Parcel Map shown in Figure 3.

The project would include construction of 328 residential units within 18 buildings, developed in three phases. Phase 1 would consist of 92 units within five residential buildings on 6.11-acres. Phase 2 would consist of 104 units within six residential buildings on 4.31-acres. Phase 3 would be developed with 132 units within seven buildings on 8.66 acres. Each residential building would consist of a mix of one-, two-, and three-bedroom units, and would vary between 12 and 24 units. All units would be equipped with air filters that meet the minimum efficiency reporting value (MERV) 14 standard. The project phasing plan is depicted in Figure 4

The project development would also involve the construction of one free standing community center, a second community center within one of the residential buildings, two maintenance buildings, and eight trash enclosures. Residential amenities would be comprised of play fields, a teen/adult recreation amenity, playground equipment, a community garden, walking paths, laundry facilities, and electric vehicle (EV) charging stations. The project would feature a community center with an active area in the northwestern corner, a playground for children aged five to twelve in the southeastern corner, another playground for children aged two to five in the southeastern corner, and a central green recreation plaza located near the heart of the residential site. Covenants, conditions, and restrictions (CC&Rs) would be established to outline the maintenance and operation obligations for the access easements, community centers, and recreational facilities and mutual rights of access to the amenities between the three developed parcels.

The proposed buildings would be designed in a modern Spanish Colonial style with tile roofing, dark vinyl windows, beige cement plaster, dark brown gutters and downspouts, light brown beams, rafter tails and doors, and decorative tiles and would be a maximum height of 35 feet. Table 1 provides further project details. Figure 4 depicts the conceptual site plan, and Figure 5 through Figure 9 provide visual renderings of the proposed building elevations.

**Table 1 Project Summary**

Project Component	Phase 1	Phase 2	Phase 3
<b>Building Types</b>			
Residential (A)	Number of buildings: 2 Total square footage: 50,180 sf	Number of buildings: 2 Total square footage: 50,180 sf	Number of buildings: 3 Total square footage: 75,270 sf
Residential (B)	Number of buildings: 2 Total square footage: 34,114 sf	Number of buildings: 2 Total square footage: 34,114 sf	Number of buildings: 3 Total square footage: 51,171 sf
Residential (C)	Number of buildings: 1 Total square footage: 12,758 sf	Number of buildings: 2 Total square footage: 25,516 sf	N/A
Community Center + Residential (D)	N/A	N/A	Number of buildings: 1 Total square footage: 17,400 sf
Community Center (E)	Number of buildings: 1 Total square footage: 4,810 sf	N/A	N/A
Maintenance Building	Number of buildings: 1 Total square footage: 637 sf	N/A	Number of buildings: 1 Total square footage: 637 sf
Trash Enclosures	Square footage: 660 sf	Square footage: 440 sf	Square footage: 660 sf
<b>Total Floor Area</b>	<b>103,159 sf</b>	<b>110,250 sf</b>	<b>145,138 sf</b>
<b>Total Number of Buildings</b>	<b>7</b>	<b>6</b>	<b>8</b>
<b>Sitewide Open Space, Landscaping, and Parking</b>			
Landscaping			188,957 sf (4.34 acres)
Common			230,758 sf (5.30 acres)
Private			17,876 sf (0.41 acres)
<b>Total Open Space</b>			<b>248,624 sf (5.71 acres)</b>
Conservation Space (open space)			2,759,090 sf (63.34 acres)
Vehicle Parking			565 spaces
sf = square feet			

## Site Access and Parking

Access to the site would be provided by two driveways off Ventura Avenue and interior circulation would be provided by private interior streets. A connection to Floral Drive in the northwest corner would be provided for emergency use only, with a locked emergency access gate only available to first responders. The project proposes 30-foot-wide access roads that would extend through the project site before ending at the eastern boundary of the site. The access roads would provide access to all proposed parking spaces and would enable internal circulation of vehicles and bicycles on-site.

The project would feature a total of 565 parking spaces, including 27 accessible spaces and guest parking. Additionally, the project would provide EV charging stations in accordance with CALGreen requirements.



## Utilities

The project would require new connections to existing utilities infrastructure, including water, wastewater, and electricity. The buildings would be all-electric, and no natural gas would be supplied to the project site. The project would be served by Ojai Valley Sanitation District for sewer, Ventura Water (City of Ventura) for water, and Southern California Edison for electricity.

## Landscaping

The project would add 188,957 square feet (sf) of landscaping to the project site. Project landscaping would include trees, succulents, and shrubs throughout the project site. The project would involve the removal of seven protected trees, including five heritage trees and one native protected tree as listed in Table 2. In addition to removal, there would be encroachment into the Tree Protection Zones (TPZ) of four other protected trees during construction. Project landscaping plan would provide for replacement trees or payment of an in-lieu fee consistent with the NCZO Sec. 8107-25 requirements. Planting would be split into three zones (Zones 0, 1, and 2) throughout the project site following a planting plan that would comply with the Ventura County Fire Department (VCFD) fire clearance requirements per VCFD Standard 515.

Zone 0 would contain no trees and consist of non-woody, small herbaceous or succulent plants. Additionally, designers and contractors would adhere to fire clearance requirements regarding setbacks, vine placement, and combustible materials. Zone 1 would include trees planted 20 feet apart, with no canopy extending within 10 feet of buildings. Shrubs would have a maximum height and width of four feet. Ground covers would be no taller than 12 inches, with groupings not exceeding 200 square feet. Zone 2 would include trees planted 10 feet apart. Shrub groupings would not exceed four feet in height or 50 square feet in area. Individual shrubs would have a maximum height of six feet and width of four feet. Ground covers would be no taller than 18 inches, with groupings not exceeding 500 square feet. The plant palette would be comprised of non-invasive species known to thrive in the local mediterranean climate and soil condition. Figure 10 provides the conceptual landscape plan.

**Table 2 Protected Tree Removal**

Tree ID	Common Name	Scientific Name	Girth (inches)
#640	Deodar Cedar	<i>Cedrus deodara</i>	135
#641	Silk Oak	<i>Grevillea robusta</i>	185
#642	Deodar Cedar	<i>Cedrus deodara</i>	427
#645	Coast Live Oak	<i>Quercus agrifolia</i>	41
#646	Deodar Cedar	<i>Cedrus deodara</i>	279.5
#647	Coast Live Oak	<i>Quercus agrifolia</i>	14
#648	California [Peruvian] Pepper	<i>Schinus molle</i>	113

Source: Appendix D

### Figure 3 Proposed Tentative Parcel Map

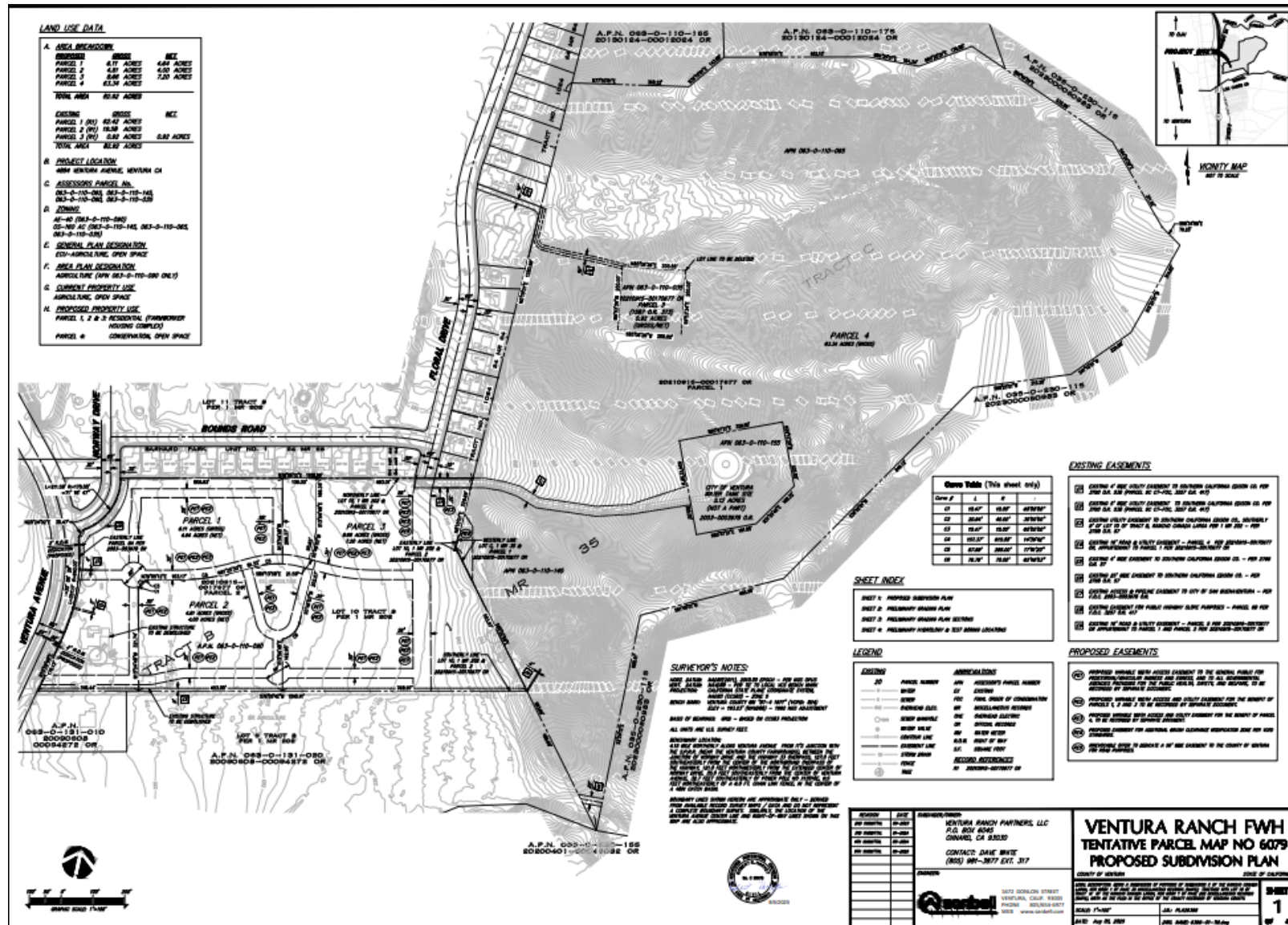


Figure 4 Conceptual Site Plan and Project Phasing

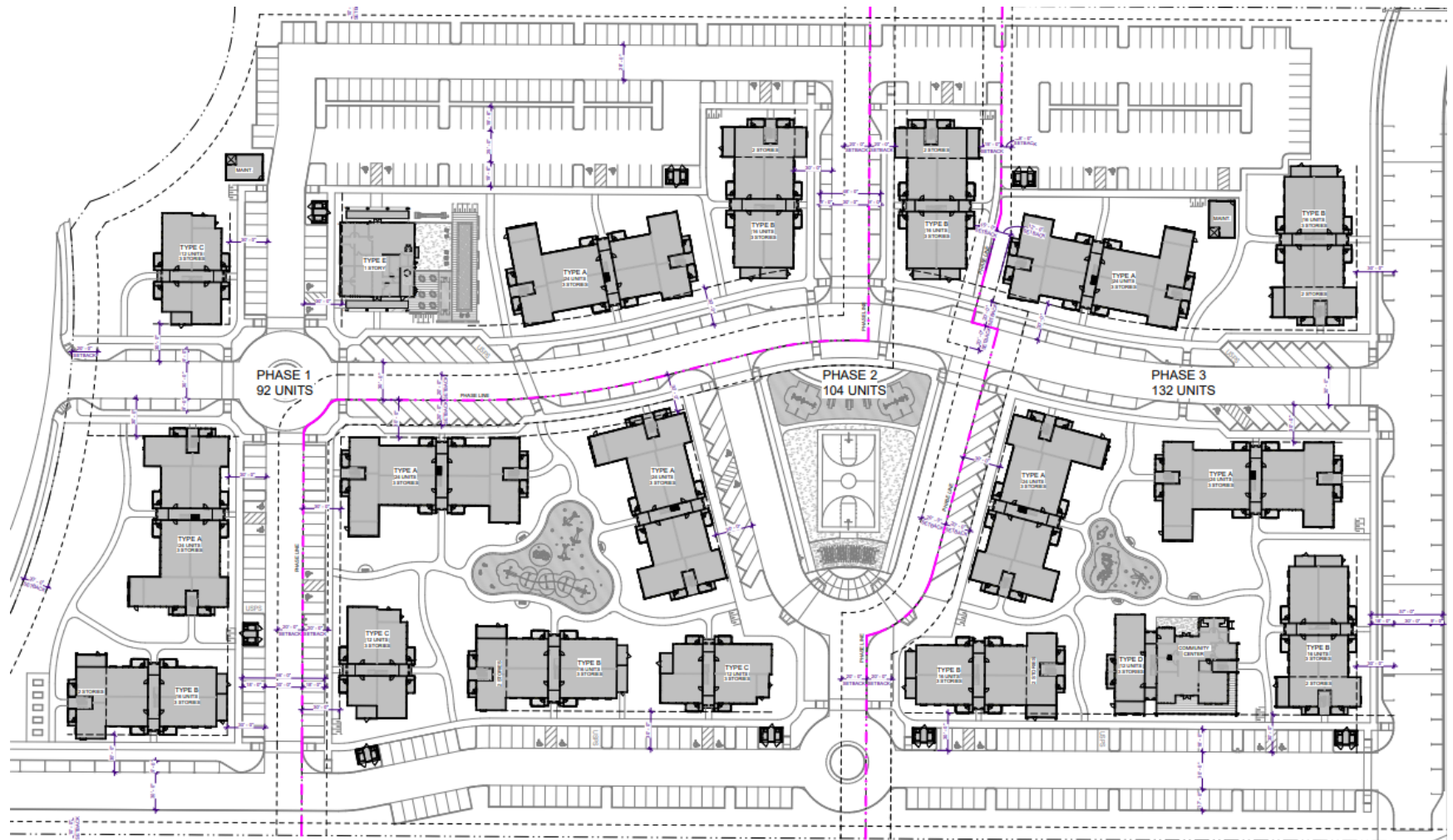




Figure 5 Building Type A Elevations



1 BUILDING A - FRONT ELEVATION



3 BUILDING A - REAR ELEVATION



2 BUILDING A - SIDE 1 ELEVATION



4 BUILDING A - SIDE 2 ELEVATION



**VENTURA RANCH FARMWORKER HOUSING**  
4884 NORTH VENTURA AVE., VENTURA, CA 93001

**BUILDING TYPE A - ELEVATIONS**  
2866-01-3522 3/22/24

**A3**

Figure 6 Building Type B Elevation



1 BUILDING B-FRONT ELEVATION  
SCALE: 1/8" = 1'-0"



2 BUILDING B-SIDE ELEVATION 1  
SCALE: 1/8" = 1'-0"



3 BUILDING B-REAR ELEVATION  
SCALE: 1/8" = 1'-0"



4 BUILDING B-SIDE ELEVATION 2  
SCALE: 1/8" = 1'-0"





Figure 7 Building Type C Elevations



1 BUILDING C - FRONT ELEVATION

SCALE: 1/8" = 1'-0"



2 BUILDING C - SIDE 2 ELEVATION

SCALE: 1/8" = 1'-0"



3 BUILDING C - BACK ELEVATION

SCALE: 1/8" = 1'-0"



4 BUILDING C - SIDE 1 ELEVATION

SCALE: 1/8" = 1'-0"

M1	M2	M3	M4	M5	M6	M7	M8
<b>TILE ROOF</b> LOS PADRES BLEND	<b>VINYL WINDOW</b> MATCH CASCADE BRONZE EXTERIOR OR EQUAL	<b>CEMENT PLASTER</b> MATCH OMEGA 9239 CAPPUCCINO OR EQUAL	<b>CEMENT PLASTER</b> MATCH OMEGA 9222 OYSTER SHELL OR EQUAL	<b>FABRIC AWNING</b> SUNBRELLA PERSIAN GREEN OR EQUAL	<b>GUTTERS AND DOWNSPOUTS</b> PAINT TO MATCH METROPOLIS PPG 1006-7/SATIN OR EQUAL	<b>BEAMS, RAFTER TAILS AND DOORS</b> PAINT TO MATCH CHOCOLATE RIPPLE PPG 1078-7/EGGSHELL OR EQUAL	<b>DECORATIVE TILE</b> PATTERN TBD

**Figure 8 Building Type D Elevations**



1. **BUILDING D - FRONT ELEVATION**  
 SCALE: 1/8" = 1'-0"



2. **BUILDING D - SIDE 1 ELEVATION**  
 SCALE: 1/8" = 1'-0"



3. **BUILDING D - BACK ELEVATION**  
 SCALE: 1/8" = 1'-0"



4. **BUILDING D - SIDE 2 ELEVATION**  
 SCALE: 1/8" = 1'-0"

M1		M2		M3		M4		M5		M6		M7		M8	
	<b>TILE ROOF</b> LOS PADRES BLEND		<b>VINYL WINDOW</b> MATCH CASCADE BRONZE EXTERIOR OR EQUAL		<b>CEMENT PLASTER</b> MATCH OMEGA 9239 CAPPUCCINO OR EQUAL		<b>CEMENT PLASTER</b> MATCH OMEGA 9222 OYSTER SHELL OR EQUAL		<b>FABRIC AWNING</b> SUNBRELLA PERSIAN GREEN OR EQUAL		<b>GUTTERS AND DOWNSPOUTS</b> PAINT TO MATCH METROPOLIS PPG 1006-7/SATIN OR EQUAL		<b>BEAMS, RAFTER TAILS AND DOORS</b> PAINT TO MATCH CHOCOLATE RIPPLE PPG 1078-7/EGGSHELL OR EQUAL		<b>DECORATIVE TILE</b> PATTERN TBD

**Figure 9 Building Type E, Maintenance and Trash Elevations**





Figure 10 Conceptual Landscape Plan



## **Project Construction**

Project construction would be developed in three phases. Phase 1 construction would occur over approximately 20 months and would involve approximately 14 days of demolition, 90 days of site preparation, 30 days of grading, 14 months of building construction, and 30 days of architectural coating. Excavation and trenching for utilities would involve a maximum depth of up to approximately 10 feet below ground surface. Phase 1 would be operational in 2028.

Phase 2 construction would occur over approximately 20 months and would involve approximately 90 days of site preparation, 30 days of grading, 14 months of building construction, and 30 days of architectural coating. Excavation and trenching for utilities would involve a maximum depth of up to approximately 10 feet below ground surface. Phase 2 would be operational in 2030.

Phase 3 construction would occur over approximately 20 months and would involve approximately 90 days of site preparation, 30 days of grading, 14 months of building construction, and 30 days of architectural coating. Excavation and trenching for utilities would involve a maximum depth of up to approximately 10 feet below ground surface. Phase 3 would be operational in 2032.

A total of 5,700 sf of existing buildings and accessory structures would be demolished and removed from the site. A total of 17,000 cubic yards of soil would be imported during project construction. Exported soil, demolished building materials, and construction waste is anticipated to be taken to Toland Road Landfill located approximately 17.6 miles northeast of the project site.

## **Density Bonus Law Waivers/Concession**

Because the project would be 100 percent affordable, it qualifies for a density bonus under NCZO Section 8116-1 and California Government Code Section 65915 (“Density Bonus Law”). Under the Density Bonus Law, the project is eligible for:

- Up to five concessions or incentives, which are typically taken in the form of relaxation of zoning standards (Government Code Section 65915(d)).
- Waiver or reduction of development standards that would have the effect of physically precluding the construction of the project (Government Code Section 65915(e)).
- Reduced parking ratios (Government Code Section 65915(p)).

The applicant for the project has made the following requests pursuant to the Density Bonus Law:

- A concession to allow outdoor private area on ground floor units to be sized based on the standard for upper floor units (NCZO Section 8107-41.3.3(d)(4)).
- A concession to allow a reduced side setback of 12 feet for a residential building and an 8-foot side setback for a trash enclosure on Parcel 3.
- A waiver of NCZO Section 8107-41.3.3(c), which prohibits farmworker housing complexes in the Very High Fire Hazard Severity Zone (VHFHSZ).
- Application of the parking ratios in Government Code Section 65915(p).

## **Project Approvals**

The County of Ventura (also referred to as “the County”) is the lead agency under the California Environmental Quality Act (CEQA) with primary responsibility for approving the project. The project would require the following discretionary approvals from the County of Ventura:

- Planned Development Permit



- Tentative Parcel Map
- Discretionary Tree Removal Permit

In addition, project approvals from the Ventura County Public Works Agency for grading, the Los Angeles Regional Water Quality Control Board for the Construction General Permit, Fire and Building Safety permits, and the Ventura Local Agency Formation Commission for the Out of Agency Service Agreement for water would be required.

## 1. Overview of CEQA Section 15183 Checklist

California Public Resources Code section 21083.3 and CEQA Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an environmental impact report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: (1) Are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent; (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action; or (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the Project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

## 2. 2040 General Plan Program EIR

The Ventura County Board of Supervisors adopted the County's 2040 General Plan and certified a program environmental impact report (herein, "General Plan EIR"; State Clearinghouse [SCH] No. 2019011026) in September 2020. The 2040 General Plan EIR was prepared as a Program EIR pursuant to CEQA (California Public Resources Code, Sections 21000, et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Sections 15000, et seq.). According to Section 15168 of the CEQA Guidelines, a Program EIR may be prepared on a series of actions that can be characterized as one large project. The use of a Program EIR gives the Lead Agency an opportunity to consider broad policy alternatives and program-wide mitigation measures, as well as greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive scale.

The 2040 General Plan EIR analyzed potential environmental impacts associated with implementation of the 2040 General Plan at a broad, programmatic level rather than at a site-specific or project-level scale. Consequently, the analysis in the 2040 General Plan EIR considers impacts in a generalized manner, based on countywide assumptions about growth and development patterns. In contrast, this document evaluates the potential impacts of a specific project at a more detailed, site-specific level. The level of environmental impact associated with the project may be less than the impacts identified in the program-level analysis, as site-specific conditions and mitigation measures can be addressed with greater precision at the project level.

### 3. Summary of Findings

The project is consistent with the 2040 General Plan. Further, the 2040 General Plan EIR adequately anticipated and described the impacts of the project. Finally, the project includes EIR mitigation measures and uniformly applied development standards necessary to substantially mitigate reduce project-specific impacts. Please see <https://rma.venturacounty.gov/wp-content/uploads/2024/10/general-plan-mitigation-monitoring-and-reporting-program.pdf> for complete list of 2040 General Plan Mitigation Measures.

A comprehensive environmental evaluation has been completed for the project as documented in the attached Section 15183 Exemption Checklist. This evaluation concludes that the project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the 2040 General Plan, as analyzed by the 2040 General Plan Update Final Program EIR (General Plan EIR, SCH #2019011026), and all required findings can be made. In accordance with CEQA Guidelines Section 15183, the project qualifies for an exemption because the following findings can be made:

1. The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.

The project would develop a 100 percent affordable, 328-unit farmworker housing complex on a 19.8-acre portion of an 83-acre parent parcel. The housing would be restricted to farmworkers who qualify as lower income. The project would also set aside an approximately 63-acre conservation parcel that would be transferred to a Planning Director-approved conservation organization or public agency to remain open space in perpetuity. The 83-acre project site is zoned with a mix of Open Space (OS-160 ac) and Agricultural Exclusive (AE-40 ac), and is partially within the sphere of influence of the City of Ventura. The project would be consistent with the development and density standards established by NCZO Sections 8103-2.7, 8105-4, and 8107-41, which allow for the construction of farmworker housing complexes on land zoned AE within or adjacent to a city sphere of influence with the issuance of a Planned Development (PD) permit. The project is, therefore, an allowed use subject to applicable AE-40 development standards, which is consistent with the zoning established by the 2040 General Plan and the certified 2040 General Plan EIR.

2. There are no project specific effects which are peculiar to the project or its site, and which the 2040 General Plan EIR failed to analyze as significant effects.

The property does not support any peculiar environmental features. Though the project site contains farmland and protected trees and is within a Very High Fire Hazard Severity Zone, these resources and issues were analyzed in the 2040 General Plan EIR and the project would not result in any peculiar effects or more severe impacts that were not analyzed and disclosed in the 2040 General Plan EIR. As further described in the Section 15183 Checklist below, there are no specific effects that are peculiar to the project or the project site. All project impacts were adequately analyzed by the 2040 General Plan EIR. Pursuant to Section 15183 of the CEQA Guidelines, mitigation measures from the 2040 General Plan EIR and applicable uniformly applied development policies or standards have been incorporated into the conditions of approval for this project to substantially mitigate potentially significant impacts.

3. There are no potentially significant off-site and/or cumulative impacts which the 2040 General Plan EIR failed to evaluate.

The project is an allowed use subject to applicable AE-40 and agricultural worker housing development standards which are consistent with the zoning and the Goals, Programs, and Policies established by the 2040 General Plan and the 2040 General Plan EIR. The 2040 General Plan EIR considered the incremental impacts of the project, and as explained further in the Section 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

4. There is no substantial new information which results in more severe impacts than anticipated by the 2040 General Plan EIR.

As explained in the Section 15183 Exemption Checklist below, no new information has been identified which would result in a determination of a more severe impact than had been anticipated by the 2040 General Plan EIR.

5. The project will incorporate applicable mitigation measures specified in the 2040 General Plan EIR.

As explained in the Section 15183 Exemption Checklist below, the project would incorporate applicable mitigation measures specified in the adopted 2040 General Plan EIR. These adopted mitigation measures would be imposed and implemented through project design, compliance with regulations and ordinances, and through the project's conditions of approval.

6. Previously adopted and uniformly applied development policies or standards would substantially mitigate the effects of the project.

Section 15183 of the CEQA Guidelines states, "Where a city or county, in previously adopting uniformly applied development policies or standards for imposition on future projects, failed to make a finding as to whether such policies or standards would substantially mitigate the effects of future projects, the decision-making body of the city or county, prior to approving such a future project pursuant to this section, may hold a public hearing for the purpose of considering whether, as applied to the project, such standards or policies would substantially mitigate the effects of the project. Such a public hearing need only be held if the city or county decides to apply the standards or policies as permitted in this section." The County has determined that numerous policies or standards can be uniformly applied to the project, as summarized below in Table 3 and discussed in detail of the 15183 Exemption Checklist. Further, the County through this finding acknowledges that the use of the uniformly applied development policies or standards summarized below are appropriate for application to the project, would be incorporated into the conditions of approval of the project, and that a finding by the decision-maker for the use of uniformly applied development policies or standards will be made in the CEQA exemption, consistent with the provisions of Section 15183.

**Table 3 Summary of Uniformly Applied Development Policies or Standards**

Issue Area	Potential Impacts Addressed	Conditions of Approval (COA)	Summary of Uniformly Applied Development Policies or Standards
Aesthetics, Scenic Resources, and Light and Glare	Potential impacts from nighttime lighting and visual changes due to new residential development and site lighting mitigated through completion of a lighting plan and compliance with County landscaping and screening requirements. (see discussion in Aesthetics, Scenic Resources, and Light and Glare Section).	COA No. A-3 (Site Maintenance); COA No. C-7 (Landscaping and Screening); COA No. C-8 (Lighting Plan); COA No. C-9 (Sign Plan)	2040 General Plan Mitigation Measure AES-1; NCZO Sections 8106-8.6 and 8108-5.12
Agricultural and Forestry Resources	Potential impacts from conversion of 20.2 acres of Farmland of Statewide Importance and 0.66 acres of Farmland of Local Importance minimized through dedication of a conservation easement and conditions of approval (see discussion in Agricultural and Forestry Resources Section).	COA No. C-29 (Notification and Response Plan)	2040 General Plan Policy AG-1.1 and AG-1.8, Agricultural Land Protection and Preservation
Air Quality	Potential impacts from construction emissions including reactive organic compounds and nitrogen oxides mitigated through best management practices (see discussion in Air Quality Section)	COA No. A-21 (Emission Reduction Measures – Construction); COA No. A-22 (Dust During Construction)	Mitigation Measures AQ-1 and AQ-2;; 2040 General Plan Policies HAZ-10.13, and HAZ-10.14; 2040 General Plan Hazards and Safety Element Implementation Program HAZ-Y: Construction Air Pollutant Best Management Practices and Implementation Program HAZ-Z: Fugitive Dust Best Management Practices; Ventura County Air Pollution Control District Rules 50, 51, and 55
Biological Resources	Potential impacts related to removal of protected trees and nesting birds mitigated through tree replacement and seasonal avoidance measures (see discussion in Biological Resources Section).	COA No. C-7 (Landscaping and Screening); COA No. C-14 (Tree Protection Plan); COA No. C-15 (Tree Health Monitoring and Reporting); COA No. A-11 (Avoidance of Nesting Birds)	Mitigation Measures BIO-1 through BIO-3; NCZO Section 8107-25 et seq. and Section 8106-8.6; Tree Protection Guidelines; PRC Section 21083.4; Fish and Game Code Section 1361; Migratory Bird Treaty Act; 2040 General Plan Policy HAZ-9.2: Noise Compatibility Standards

County of Ventura  
**Ventura Ranch Farmworker Housing Complex**

Issue Area	Potential Impacts Addressed	Conditions of Approval (COA)	Summary of Uniformly Applied Development Policies or Standards
Cultural Resources	Potential impacts from ground disturbance and discovery of archaeological materials mitigated through monitoring and discovery protocols (see discussion in Cultural Resources Section).	COA No. A-12 (Archaeological Monitoring); COA No. A-13 (Archaeological Resources Discovered During Grading)	Mitigation Measure CUL-1 through CUL-3; Health and Safety Code Section 7050.5; CEQA Guidelines Section 15064.5; California Public Resources Code Section 5097.98; 2040 General Plan Policies COS-4.2(b) and COS-4.4; 2040 General Plan Conservation Element Implementation Program COS-HH: Cultural Records Research and Implementation Program COS-II: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures;
Energy	Potential impacts from construction-related energy use and long-term operational energy demand minimized through all-electric building design and compliance with CALGreen standards (see discussion in Energy Section).	N/A	California Green Building Standards Code (CALGreen; Title 24, Part 11); California Building Energy Efficiency Standards (Title 24, Part 6)
Geologic Hazards and Paleontological Resources	Potential impacts from grading and soil disturbance minimized through geotechnical design and compliance with County grading and building codes. Potential impacts to paleontological resources during construction mitigated through resource discovery protocol (see discussion in Geologic Hazards and Paleontological Resources Section).	COA No. C-19 (Grading Permit); COA No. C-20 (Drainage Plan); COA No. A-19 (Compliance with Stormwater Development Construction Program); COA No. A-20 (State Construction General Stormwater Permit No. CAS000002 Requirements); COA No. C-47 (Building Plan Review)	Mitigation Measure CUL-3, Ventura County Building Code; National Pollutant Discharge Elimination System; Ventura County Stormwater Quality Management Ordinance; California Building Code; 2040 General Plan Implementation Program COS-II: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures; 2040 General Plan Policies HAZ-4.3, HAZ-4.5, HAZ-4.6, HAZ-4.7, and HAZ-4.16



Issue Area		Potential Impacts Addressed	Conditions of Approval (COA)	Summary of Uniformly Applied Development Policies or Standards
Greenhouse Emissions	Gas	Potential impacts from construction and operational GHG emissions minimized through electrification, solar energy, and EV infrastructure (see discussion in Greenhouse Gas Emissions Section).	N/A	CALGreen (Title 24, Part 11); California Building Energy Efficiency Standards (Title 24, Part 6); 2040 General Plan Section B.1.5: GHG Implementation Programs
Hazards, Hazardous Materials, and Wildfire		Potential impacts from historical pesticide use and abandoned storage tanks minimized through site investigation and hazardous materials management plans (see discussion in Hazards, Hazardous Materials, and Wildfire Section).	COA No. C-17 (Undergrounding of All Electric, Cable, Phone, and Internet Lines); COA No. C-30 (Private Access Road Design); COA No. C-31 (Projects Having More Than 100 Dwelling Units or 200 Guest Rooms); COA No. C-32 (Access Road Certification); COA No. C-33 (Fire Lanes); COA No. C-36 (Private Road/Driveway Maintenance Agreement and Fund); COA No. C-37 (Access Road Gates); COA No. C-38 (Walk and Pedestrian Gates); COA No. C-39 (Fire Flow); COA No. C-40 (Fire Hydrant(s)); COA No. C-41 (Hydrant Location Markers); COA No. B-14 (Water Mains (Land Divisions)); ; COA No. C-42 (Fire Sprinklers); COA No. C-43 (Fire Alarm); COA No. C-48 (Hazardous Fire Area); COA No. C-49 (Hazard Abatement); COA No. C-50 (Fire Protection Plan); COA No. C-51 (Fuel Modification Plans); COA No. C-52 (Fire Department Clearance); COA No. C-53 (Phasing Plan);	Ventura County Fire Department Codes, Ordinances, and Standards; California Building Code; California Fire Code; California Code of Regulations Title 22; VCAPCD Rule 62.7; Asbestos Demolition and Renovation; Hazardous Materials Transportation Act; Resource Conservation and Recovery Act; California Hazardous Material Management Act; Toxic Substances Control Act; Occupational Safety and Health Act; 2040 General Plan Policy PFS-7.4
Hydrology and Water Quality		Potential impacts from stormwater runoff minimized through drainage planning, best management practices (BMPs), and compliance with NPDES permits (see discussion in Hydrology and Water Quality Section).	COA No. C-7 (Landscaping and Screening); COA No. C-19 (Grading Permit); COA No. C-20 (Drainage Plan); COA No. C-24 (Collection and Loading Areas for Refuse and Recyclables and Organic Waste); COA No. A-19 (Compliance with Stormwater Development Construction Program); COA No. A-20 (State Construction General Stormwater Permit No. CAS000002 Requirements).	Ventura County Building Code; National Pollutant Discharge Elimination System; Ventura County Stormwater Quality Management Ordinance

County of Ventura  
**Ventura Ranch Farmworker Housing Complex**

Issue Area			Potential Impacts Addressed	Conditions of Approval (COA)	Summary of Uniformly Applied Development Policies or Standards
Land Use and Planning			No impacts from land use conflicts or community division; project is consistent with zoning and 2040 General Plan policies (see discussion in Land Use and Planning Section).	COA No. A-2 (Required Improvements for VTPM and PD); COA No. A-18 (Road Improvements); COA No. B-9 (Dedication of Right-of-Way); COA No. C-29 (Notification and Response Plan)	N/A
Noise and Vibration			Potential impacts from construction and operational noise minimized through compliance with County noise thresholds and construction restrictions (see discussion in Noise and Vibration Section).	COA No. A-14 (Construction Noise)	2040 General Plan Policy HAZ-9.2:Noise Compatibility Standards
Population and Housing			Project would provide affordable housing for farmworkers consistent with the 2040 General Plan and housing goals (see discussion in Population and Housing Section).	COA No. C-16 (Employment Criteria within a Farmworker Housing Complex)	NCZO Section 8107-41.1
Public Services			Potential impacts to fire protection services minimized through project design, hydrants, and emergency access (see discussion in Public Services and Wildfire Section).	COA No. C-30 (Private Access Road Design); COA No. C-31 (Projects Having More Than 100 Dwelling Units or 200 Guest Rooms); COA No. C-32 (Access Road Certification); COA No. C-33 (Fire Lanes); COA No. C-36 (Private Road/Driveway Maintenance Agreement and Fund); COA No. C-37 (Access Road Gates); COA No. C-38 (Walk and Pedestrian Gates); COA No. C-49 (Fire Flow); COA No. C-40 (Fire Hydrant(s)); COA No. C-41 (Hydrant Location Markers); COA No. B-14 (Water Mains (Land Divisions)); ; COA No. C-42 (Fire Sprinklers); COA No. C-43 (Fire Alarm); COA No. C-48 (Hazardous Fire Area); COA No. C-49 (Hazard Abatement); COA No. C-50 (Fire Protection Plan); COA No. C-51 (Fuel Modification Plans); COA No. C-52 (Fire Department Clearance); COA No. C-53 (Phasing Plan); COA No. C-54 (Inspection Authority); COA No. B-11 (Map Approval); COA No. B-12 (Recorded Map); COA No. B-14 (Access Covenant); COA No. B-15 (Quimby Ordinance Compliance)	Ventura County Fire Department Codes, Ordinances, and Standards

Issue Area	Potential Impacts Addressed	Conditions of Approval (COA)	Summary of Uniformly Applied Development Policies or Standards
Recreation	Potential impacts to recreational facilities minimized due to on-site recreational amenities provided (see discussion in Recreation Section).	COA No. B-15 (Quimby Ordinance Compliance)	N/A
Transportation and Traffic	Potential impacts related to consistency with policies, emergency access, and roadway hazards minimized through roadway improvements, less than significant VMT impacts for affordable housing (see discussion in Transportation Section).	COA No. C-25 (Transportation Impact Mitigation Fee); COA No. B-9 (Dedication of Right-of-Way); COA No. A-18 (Road Improvements); COA No. C-26 (Driveway Access); COA No. C-27 (Encroachment Permit); COA No. C-30 (Private Access Road Design); COA No. C-31 (Projects Having More Than 100 Dwelling Units or 200 Guest Rooms); COA No. C-32 (Access Road Certification); No. C-34 (Fire Lanes); COA No. C-36 (Private Road/Driveway Maintenance Agreement and Fund); COA No. C-37 (Access Road Gates); COA No. C-38 (Walk and Pedestrian Gates); COA No. C-53 (Phasing Plan)	2040 General Plan Policies CTM 1.1, and 1.7; "Paveout Policy"; Code of Ordinances Division 8, Chapter 4 – Urban Area Development; City of Ventura Standard Detail No. 104
Tribal Cultural Resources	Potential impacts from ground disturbance mitigated through Native American construction monitoring and discovery protocols (see discussion in Tribal Cultural Resources Section).	COA No. A-12 (Archaeological Monitoring); COA No. A-13 (Archaeological Resources Discovered During Grading)	Mitigation Measure CUL-1 through CUL-3; 2040 General Plan Implementation Program COS-HH: Cultural Records Research and Implementation Program COS-II: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures
Utilities	Adequate existing facilities serve the project site, Potential impacts from increased demand for water, wastewater, and solid waste services minimized through compliance with County standards (see discussion in Utilities Section).	COA No. C-7 (Landscaping and Screening); COA No. C-11 (Trash and Recycling Storage Area); COA No. B-7 (Sewer Service Certificate for Subdivisions); COA No. B-8 (Water Supply Certificate for Subdivisions); COA No. C-20 (Drainage Plan); COA No. C-21 (All Improvements Required); COA No. C-22 (Waste Diversion and Recycling Requirement); COA No. C-23 (Construction and Demolition Debris Recycling Plan); COA No. C-24 (Collection and Loading Areas for Refuse and Recyclables and Organic Waste); COA No. C-28 (Will Serve Letter); COA No.	CALGreen (Title 24, Part 11); NCZO Sections 8106-8.7 and 8108-5.13; Ventura County Ordinance Code Section 4770 et seq. and Section 4773 et seq.; California Solid Waste Reuse and Recycling Access Act of 1991; 2040 General Plan Policies WR-1.1, WR-1.6, and WR-1.11

County of Ventura  
**Ventura Ranch Farmworker Housing Complex**

Issue Area	Potential Impacts Addressed	Conditions of Approval (COA)	Summary of Uniformly Applied Development Policies or Standards
Wildfire	Potential impacts from development in a Very High Fire Hazard Severity Zone minimized through fuel modification zones, fire-resistant construction, and emergency access planning (see discussion in Wildfire Section).	<p>C-17 (Undergrounding of All Electric, Cable, Phone, Internet, and Gas Lines)</p> <p>COA No. C-17 (Undergrounding of All Electric, Cable, Phone, and Internet Lines); COA No. C-19 (Grading Permit); COA No. C-20 (Drainage Plan); COA No. C-30 (Private Access Road Design); COA No. C-31 (Projects Having More Than 100 Dwelling Units or 200 Guest Rooms); COA No. C-32 (Access Road Certification); COA No. C-33 (Fire Lanes); COA No. C-36 (Private Road/Driveway Maintenance Agreement and Fund); COA No. C-37 (Access Road Gates); COA No. C-38 (Walk and Pedestrian Gates); COA No. C-39 (Fire Flow); COA No. C-40 (Fire Hydrant(s)); COA No. C-41 (Hydrant Location Markers); COA No. B-14 (Water Mains (Land Divisions)); COA No. C-42 (Fire Sprinklers); COA No. C-43 (Fire Alarm); COA No. C-48 (Hazardous Fire Area); COA No. C-49 (Hazard Abatement); COA No. C-50 (Fire Protection Plan); COA No. C-51 (Fuel Modification Plans); COA No. C-52 (Fire Department Clearance); COA No. C-53 (Phasing Plan)</p>	Ventura County Fire Department Codes; Ordinances, and Standards; California Building Code; California Fire Code
COA = Condition of Approval; VTPM = Vesting Tentative Parcel Map; PD = Planned Development; NCZO = Non-Coastal Zoning Ordinance			

<hr/> <p>Signature</p>	<hr/> <p>Date</p>
<hr/> <p>Printed Name</p>	<hr/> <p>Title</p>

# CEQA Guidelines Section 15183 Exemption Checklist

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## Overview

This checklist provides an analysis of potential environmental impacts resulting from the project. Following the format of CEQA Guidelines Appendix G and incorporating additional thresholds from the County's Initial Study Assessment Guidelines (ISAGs), environmental effects are evaluated to determine if the project would result in a potentially significant impact triggering additional review under Guidelines Section 15183. Although the document is formatted to primarily follow Appendix G, the analysis from the 2040 General Plan Final Environmental Impact Report and related thresholds specific to the ISAGs has have been cited throughout the checklist. The checklist addresses each environmental topic included in the CEQA Guidelines Appendix G, and the following criteria from Guidelines Section 15183.

### Where was Impact Analyzed in the 2040 General Plan EIR?

This column in the summary tables presented for each CEQA Appendix G topic directs the reader to the relevant location of the 2040 General Plan EIR.

### Any Peculiar Impact?

Pursuant to CEQA Guidelines Sections 15183(b)(1) and 15183(f), this column in the summary tables presented for each CEQA Appendix G topic addresses whether the project would result in a peculiar impact, including a physical change that belongs exclusively or especially to the project or that is a distinctive characteristic of the project or the project site.

### Any Impact Not Analyzed as Significant Effect in General Plan EIR?

Pursuant to CEQA Guidelines Section 15183(b)(2), this column in the summary tables presented for each CEQA Appendix G topic indicates whether the project would result in a significant effect that was not analyzed as significant in the 2040 General Plan EIR. A new EIR is not required if such a project impact can be substantially mitigated by the imposition of uniformly applied development policies or standards.

### Any Off-Site or Cumulative Impact Not Analyzed as Significant Effect in General Plan EIR?

Pursuant to CEQA Guidelines Section 15183(b)(3), this column in the summary tables presented for each CEQA Appendix G topic indicates whether the project would result in a significant off-site or cumulative impact that was not discussed in the 2040 General Plan EIR. A new EIR is not required if such an off-site or cumulative impact can be substantially mitigated by the imposition of uniformly applied development policies or standards.

### Any Adverse Impact More Severe Based on Substantial New Information?

Pursuant to CEQA Guidelines Section 15183(b)(4), this column in the summary tables presented for each CEQA Appendix G topic indicates whether there is substantial new information that was not known at the time the 2040 General Plan EIR was certified, indicating that there would be a more severe adverse impact than discussed in the 2040 General Plan EIR. A new EIR is not required if such an impact can be substantially mitigated by the imposition of uniformly applied development policies or standards.



### **Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Address/Resolve Impacts?**

This column in the summary tables presented for each CEQA Appendix G topic indicates whether the 2040 General Plan EIR and adopted CEQA Findings provide mitigation measures to address effects in the related impact category. This column also indicates whether uniformly applied development standards or policies address identified impacts. A "yes" response will be provided if the impact is addressed by a General Plan EIR mitigation measure or uniformly applied development standards or policies. If "NA" is indicated, this Environmental Checklist Review concludes that there was no impact, the adopted mitigation measures do not apply to this project, or the impact was less than significant with the implementation of County requirements, including uniformly applied development standards, and therefore, no mitigation measures are needed.

- Items checked "Significant Project Impact" indicate that the project could result in a significant effect that requires mitigation to be reduced to a less-than-significant level or has a significant, unmitigated impact.
- Items checked "Impact not identified by General Plan EIR" indicates the project would result in a Project-specific significant impact (peculiar off-site or cumulative that was not identified in the 2040 General Plan EIR.
- Items checked "Substantial New Information" indicates that there is new information which leads to a determination that a project impact is more severe than what had been anticipated by the 2040 General Plan EIR.

A project does not qualify for a Section 15183 exemption if it is determined that it would result in: 1) a peculiar impact that was not identified as a significant impact under the 2040 General Plan EIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the 2040 General Plan EIR.

### **Discussion and Mitigation Sections**

#### *Summary of Findings*

A discussion of the findings relating to the criteria in Section 15183 of the CEQA Guidelines is contained in each section

#### *Discussion*

The checklist elements are discussed under each environmental category to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

Applicable mitigation measures from the 2040 General Plan EIR or uniformly applied development policies or standards that would apply to the project are listed under each environmental category.

*Conditions of Approval and Impact Minimization Measures*

Applicable conditions of approval and impact minimization measures that are incorporated into the project that would further minimize impact are listed under each environmental category. The Conditions of Approval (COAs) are summarized herein. For the full text of the project COAs, please refer to the COA document.

# 1 Aesthetics, Scenic Resources, and Light and Glare

## Summary of Findings

With regard to Aesthetics, Scenic Resources, and Light and Glare, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. Mitigation measures contained in the 2040 General Plan EIR would be applicable.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts to aesthetics, scenic resources, and light and glare.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>1. Aesthetics, Scenic Resources, and Light Glare</b>						
Would the project:						
a. Physically alter a scenic resource (defined as aesthetically pleasing natural physical features) that is visible from a public viewing location (defined as any physical area accessible to the public and from which a scenic resource is visible)?	GPEIR pp.4.1-20 to 4.1-25 Impact 4.1-1, Impact 4.1-2	No	No	No	No	Yes
b. Substantially obstruct, degrade, obscure, or adversely affect the character of a scenic vista (defined as a viewshed that includes scenic resources) that is visible from a public viewing location (defined as any physical area accessible to the public and from which a scenic resource is visible)?	GPEIR pp.4.1-20 to 4.1-25 Impact 4.1-1, Impact 4.1-2	No	No	No	No	Yes

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
c. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	GPEIR pp.4.1-20 to 4.1-25 Impact 4.1-1, Impact 4.1-2	No	No	No	No	Yes
d. Conflict with applicable Ventura County General Plan Goals, Policies, and Programs or policies of the applicable Area Plan governing scenic quality?	N/A	No	No	No	No	N/A
e. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	GPEIR pp.4.1-25 to 4.1-31 Impact 4.1-3 Impact 4.1-4	No	No	No	No	Yes

## Discussion

- Would the project physically alter a scenic resource (defined as aesthetically pleasing natural physical features) that is visible from a public viewing location (defined as any physical area accessible to the public and from which a scenic resource is visible)?*
- Would the project substantially obstruct, degrade, obscure, or adversely affect the character of a scenic vista (defined as a viewshed that includes scenic resources) that is visible from a public viewing location (defined as any physical area accessible to the public and from which a scenic resource is visible)?*
- Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not physically alter a scenic resource that is visible from a public viewing location, including state scenic highways (Impact 4.1-1) or substantially obstruct, degrade, obscure, or adversely affect the character of a scenic vista that is visible from a public viewing location (Impact 4.1-2); these impacts were identified as less than significant. Similarly, the 2040 General Plan EIR concluded that implementation of the 2040 General Plan would result in less than significant impacts to scenic resources within state scenic highways (Impacts 4.1-1 and 4.1-2).

A scenic resource is an aesthetically pleasing natural physical feature visible from a public viewing location. A public viewing location is defined as any physical area accessible to the public and from which a scenic resource is visible. As described in the 2040 General Plan EIR, many scenic areas and natural features exist throughout the county, including valleys and mountain ranges and the Channel

Islands. Ventura County has developed a Scenic Resource Protection Overlay Zone to protect scenic resources throughout the county, which includes all scenic areas designated by the County surrounding Lake Casitas, Lake Matilija, Lake Piru, and Lake Sherwood; ridgelines surrounding the city of Ojai; and 40 miles of SR 33 that wind through the coastal mountain range from Pine Mountain Summit to the northwestern boundary of the County with the County of Santa Barbara, which are designated as a State scenic highway by the California Scenic Highway Program. Portions of Hidden Valley, located in the Santa Monica Mountains and along the southwestern border of Simi Valley and the southern border of Thousand Oaks, to the north of the border with Los Angeles County, are also part of the Scenic Resource Protection Overlay Zone.

The project site is located 3.62 miles north of the City of Ventura and consists of undeveloped open space, an orchard with associated accessory structures (e.g., barns and storage), and a single-family residence with a covered patio and detached garage. The project site does not contain scenic resources, is not located within an area subject to the Scenic Resource Protection Overlay Zone and is not located between a public viewing location and a scenic resource identified in the 2040 General Plan EIR. As such, the project would not physically alter a scenic resource (defined as aesthetically pleasing natural physical features) that is visible from a public viewing location or substantially obstruct, degrade, obscure, or adversely affect the character of a scenic vista.

There are five state-designated or eligible state scenic highways located in Ventura County.<sup>1</sup> The nearest officially designated scenic highway is a portion of SR 33 located approximately 12 miles northeast of the project site. Due to the distance, the project site would not be visible from this roadway. The nearest eligible state-scenic highway is SR 33, located approximately 250 feet west of the project site. Though the project site would be visible to motorists on SR 33, the project site does not contain scenic resources such as historic buildings, rock outcroppings, or scenic trees. Additionally, the project would be required to ensure that the project site is maintained in a neat and orderly manner so as not to create any hazardous conditions or unsightly conditions which are visible from outside of the project site (Condition of Approval No. A-3) and comply with the County's landscaping and screening requirements (Condition of Approval No. C-7). Therefore, the project would not result in significant impacts to scenic resources within a state scenic highway.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to scenic resources, scenic vistas, visual character, scenic quality, or state scenic highways and the project would not result in significant impacts for these topics. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*d. Would the project conflict with applicable Ventura County General Plan Goals, Policies, and Programs or policies of the applicable Area Plan governing scenic quality?*

The project site is located within the North Ventura Avenue Area Plan of Ventura County.<sup>2</sup> This area plan is a component of the 2040 General Plan and focuses specifically on the North Ventura Avenue area, ensuring consistency with the countywide plan while supplementing it with tailored goals, policies, and programs. The North Ventura Avenue Area Plan emphasizes the protection of scenic resources, particularly views of hillsides and the Ventura River corridor from SR 33, which is

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<sup>1</sup> California Department of Transportation. 2025. California State Scenic Highway System Map. Available: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed June 2025.

<sup>2</sup> County of Ventura. 2020. North Ventura Avenue Area Plan. Available: <https://rmadocs.venturacounty.gov/planning/programs/general-plan/publications/area-plans/ventura-county-north-ventura-ave-area-plan.pdf>. Accessed June 2025.

recognized as a scenic approach into the City. While Ventura Avenue south of the North Ventura Area Plan has been designated as a City scenic drive, the North Ventura Avenue Area Plan notes that scenic qualities are most prominent along SR 33 due to its elevated alignment.<sup>3</sup>

The project would be designed to maintain the area's scenic character by avoiding obstruction of hillside views from SR 33 and by incorporating landscaping and building design that complements the surrounding residential, agricultural, and open space context. Development would be concentrated within the flat, western portion of the project site, avoiding the hillsides and open space terrain located in the eastern portion of the project site. The project would limit building heights to 35 feet to preserve hillside views and would incorporate native vegetation around the site for visual integration. The western, hilly portion of the project site would be maintained in its existing condition through a conservation easement, ensuring the long-term preservation of hillsides and open space on the project site. By doing so, the project supports the North Ventura Avenue Area Plan's scenic quality objectives while fulfilling countywide goals to provide high-quality and affordable housing for Ventura County's farm workers.

The project site has General Plan land use designations of Open Space (OS) and ECU-Agriculture (ECU-A), where 'ECU' refers to Existing Communities and Urban designated areas. The project site is zoned Agriculture Exclusive (AE). The existing zoning and General Plan designations for the project site allow for the development of a farmworker housing complex with approval of a Planned Development Permit. The provisioning of farmworker housing would assist in providing high-quality, affordable housing for Ventura County's farmworker labor force, and would assist in preserving and maintaining agriculture as a major industry in the county. The provisioning of farmworker housing also aligns with the Ventura County Save Open Space and Agricultural Resources (SOAR) Initiative, which includes objectives to provide adequate farmworker housing in order to sustain the viability of the agriculture industry in Ventura.

As previously discussed, the project site is designated as ECU-Agricultural and Open Space under the 2040 General Plan and the North Ventura Avenue Area Plan. The project would support the agricultural workforce and align with county goals for preserving agricultural lands and promoting affordable housing. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*e. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

The 2040 General Plan EIR concluded that 2040 General Plan implementation would result in a potentially significant impact related to creating a new source of disability glare or discomfort glare for motorists traveling along the County Regional Road Network (Impact 4.1-3); this impact was identified as less than significant with implementation of Mitigation Measure AES-1, which requires the County to implement a program to review discretionary development for glare effects along Regional Roadway Network roadways. The 2040 General Plan EIR concluded that 2040 General Plan implementation would create new sources of light and glare, but that impacts to daytime or nighttime views would be less than significant due to the provisions of the NCZO and Coastal Zoning Ordinance that adequately regulate light and glare.

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<sup>3</sup> *Ibid*

New light sources identified in 2040 General Plan EIR included light from new residential developments, street lighting, parking lot lights, security-related lighting, and lighting associated with increased traffic volumes. These new light sources could result in adverse effects on adjacent land uses by "spilling over" of light into these areas and creating "sky glow." Daytime glare could be produced by increased commercial, industrial, and residential structures, which could introduce materials, such as metal and glass, that reflect sunlight.

The project would introduce new sources of daytime and nighttime lighting on the project site by installing exterior light fixtures required for security and safety. Lighting on the project site is required to be in compliance with NCZO Sections 8106-8.6 and 8108-5.12 which ensures that project lighting avoids interference with reasonable use of adjoining properties; avoids conflicts with landscape features; minimizes on-site and eliminates off-site glare, including glare that may impact drivers along North Ventura Avenue; provides adequate on-site lighting for security; minimizes energy consumption; and includes devices that are compatible with the design of the permitted facility (Condition of Approval No. C-8). The applicant would be required to submit a lighting plan to the Planning Division for review and approval (Condition of Approval No. C-8). Additionally, the project would be required to ensure that the project site is maintained in a neat and orderly manner so as not to create any hazardous conditions or unsightly conditions which are visible from outside of the project site (Condition of Approval No. A-3), comply with the County's landscaping and screening requirements (Condition of Approval No. C-7), and ensure signage on the property that complies with Chapter 1, Article 10 of the NCZO and the North Ventura Avenue Area Plan (Condition of Approval No. C-9).

As previously discussed, the 2040 General Plan EIR identified less than significant impacts related to substantial light or glare with implementation of Mitigation Measure AES-1. The project would not result in a significant impact for this topic. Through compliance with uniformly applied development policies or standards, the potential impact from lighting and glare would be reduced to less than significant. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

## **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

Mitigation Measure AES-1 identified in the 2040 General Plan EIR would be applicable to the project:

<b>MM AES-1      Implementation Program COS-FF: Review Discretionary Development for Glare Effects Along Regional Road Network Roadways</b>	
<b>Purpose</b>	Reduction of glare impacts
<b>Description</b>	The applicant shall submit a detailed site plan and list of project materials to the County for review and approval. If the County determines that the project would include materials that would produce disability or discomfort glare for motorists traveling along one or more RRN roadways then the County shall either require the use of alternative materials, such as high-performance tinted non-mirrored glass, painted (non-gloss panels), and pre-cast concrete or fabricated textured wall surfaces, or require that the applicant submit a study demonstrating that the project would not introduce a glare source that exceeds 3:1 in a luminance histogram, which consists of inputting a set of digital photographs from a subject glare source into a computer simulation program and generating a graph that identifies the brightness level of different sections of that scene, from darkest to brightest. Glare impacts from future projects would be considered significant when the glare source to the median of the background ration exceeds 3:1 in a luminance histogram.



MM AES-1	Implementation Program COS-FF: Review Discretionary Development for Glare Effects Along Regional Road Network Roadways
<b>Implementation Responsibility</b>	Planning Division
<b>Documentation</b>	The applicant shall submit a detailed site plan and list of project materials to the Planning Division for review and approval. If requested by the Planning Division, the applicant shall submit a study demonstrating that the project would not introduce a glare source that exceeds 3:1 in a luminance histogram.
<b>Timing</b>	The applicant shall obtain the Planning Divisions approval of the site plan and project materials prior to the issuance of a Zoning Clearance for construction.
<b>Monitoring and Reporting</b>	The Planning Division maintains a stamped copy of the approved site plan and building materials in the project file.

In addition, the following uniformly applied development policies or standards would be incorporated into the project:

- **NCZO Section 8106-8.6:** The following regulations apply to light fixtures:
  - a. A Zoning Clearance is required for freestanding light fixtures over 2 feet up to 20 feet tall on property with a zoning designation of open space, agricultural, or residential. Such light fixtures may be added to an existing developed lot in a commercial or industrial zone with a Zoning Clearance if the Planning Director or designee determines that the light fixtures are consistent with the existing approved entitlement for the property and otherwise meets all other standards of this Chapter; otherwise, a modification to the existing approved entitlement shall be required.
  - b. A freestanding light fixture over 20 feet up to 35 feet tall requires a Planning Director-approved Planned Development Permit. In commercial and industrial zones, the maximum height of freestanding light fixtures shall be specified in a discretionary permit that approved the new development.
  - c. Freestanding light fixtures shall not be placed in any side setbacks.
  - d. Lights in excess of 150 watts (for incandescent light bulbs) or 2250 lumens shall be shielded, directed downward, and installed and maintained in such a manner to avoid light trespass beyond the lot line.
- **NCZO Section 8108-5.12:** Lighting shall be provided for all parking areas in compliance with Section 8106-8.6 and the following:
  - a. Parking areas that serve night-time users shall be lighted with a minimum 1 foot-candle of light at ground for security.
  - b. All lights in parking areas that serve non-residential land uses, except those required for security per subsection (a) above, shall be extinguished at the end of the working day. Lights may be turned on no sooner than 1 hour before the commencement of working hours.
  - c. Light poles shall be located so as not to interfere with motor vehicle door opening, vehicular movement or accessible paths of travel. To the extent possible light poles shall be located away from existing and planned trees to reduce obstruction of light by tree canopies. Light poles shall be located outside of landscape finger planters, end row planters, and tree wells. Light poles may be located in perimeter planters and continuous planter strips between parking rows.

- d. Any light fixtures adjacent to a residential land use or residentially zoned lot shall be arranged and shielded so that the light will not directly illuminate the lot or land use. This requirement for shielding applies to all light fixtures, including security lighting.
- e. In order to direct light downward and minimize the amount of light spilled into the dark night sky, any new lighting fixtures installed to serve above-ground, uncovered parking areas shall be full cut-off fixtures as defined by the Illuminating Engineering Society of North America (IESNA). New lighting fixtures installed for parking area canopies or similar structures shall be recessed or flush-mounted and equipped with flat lenses.

## **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

### **Condition of Approval Number A-3: Site Maintenance**

The Permittee shall maintain the project site in a neat and orderly manner.

### **Condition of Approval Number C-7: Landscaping and Screening**

The Permittee shall retain a landscape architect to prepare a landscape plan that complies with the requirements of this condition and the California Department of Water Resources Model Water Efficient Landscape Ordinance (MWELO).

### **Condition of Approval Number C-8: Lighting Plan**

Lighting on the project site will be provided in compliance with NCZO Section 8106-8.6 to ensure that project lighting:

- a. Avoids interference with reasonable use of adjoining properties;
- b. Avoids conflicts with landscape features;
- c. Minimizes on-site and eliminates off-site glare, including glare that may impact drivers along Gonzales Road;
- d. Provides adequate on-site lighting for security;
- e. Minimizes energy consumption; and
- f. Includes devices that are compatible with the design of the permitted facility.

### **Condition of Approval Number C-9: Sign Plan**

The Permittee shall submit two copies of a sign plan to the Planning Division for review and approval prior to the issuance of a Zoning Clearance for construction. The sign plan shall include the proposed size, colors, materials, and lighting details. The Permittee shall bear the total cost of such review and approval. The Permittee also shall be responsible for obtaining a Zoning Clearance for any new or replacement sign to ensure that the signage for the project continues to comply with the approved sign plan.

## 2 Agricultural and Forestry Resources

### Summary of Findings

With regard to Agricultural and Forestry Resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. Mitigation measures contained in the 2040 General Plan EIR would not be applicable.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts to agricultural and forestry resources.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>2. Agricultural and Forestry Resources</b>						

Would the project:

- |    |   |  |    |    |    |    |     |
|----|---|--|----|----|----|----|-----|
| a. | Result in the direct and/or indirect loss Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance (defined as "Farmland" or "Important Farmland" in CEQA, pursuant to guidance in CEQA Section 21095 and State CEQA Guidelines Appendix G).   | GPEIR pp.4.2-9 to 4.2-17<br>Impact 4.2-1   | No | No | No | No | Yes |
| b. | Result in classified farmland nearby any nonagricultural land use or project that is closer than the distances set forth below, unless a justification exists for a waiver or a deviation from these distances, such that incompatibilities with adjacent land uses would not be created, based on the unique characteristics of the subject project? | GPEIR pp. 4.2-17 to 4.2-18<br>Impact 4.2-2 | No | No | No | No | Yes |

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
c. Conflict with existing zoning for agricultural use or a Williamson Act contract?	GPEIR pp.4.2-18 to 4.2-20 Impact 4.2-3	No	No	No	No	N/A
d. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	GPEIR pp.4.2-20 to 4.2-21 Impact 4.2-4	No	No	No	No	N/A
e. Result in the loss of forest land or conversion of forest land to non-forest use?	GPEIR pp.4.2-20 to 4.2-21 Impact 4.2-4	No	No	No	No	N/A
f. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	GPEIR pp.4.2-17 to 4.1-21 Impact 4.2-2, Impact 4.2-4	No	No	No	No	N/A

## Discussion

- a. *Result in the direct and/or indirect loss Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance (defined as “Farmland” or “Important Farmland” in CEQA, pursuant to guidance in CEQA Section 21095 and State CEQA Guidelines Appendix G)?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) (Impact 4.2-1). Mitigation Measures AG-1 and AG-2 were included in the 2040 General Plan EIR; however, impacts to Farmland were determined to be significant and unavoidable. The 2040 General Plan EIR and ISAGs state that a significant impact would occur if a project would result in the direct and/or indirect loss of agricultural soils meeting or exceeding the criteria shown in Table 4.

**Table 4 Agricultural Soils Loss Thresholds**

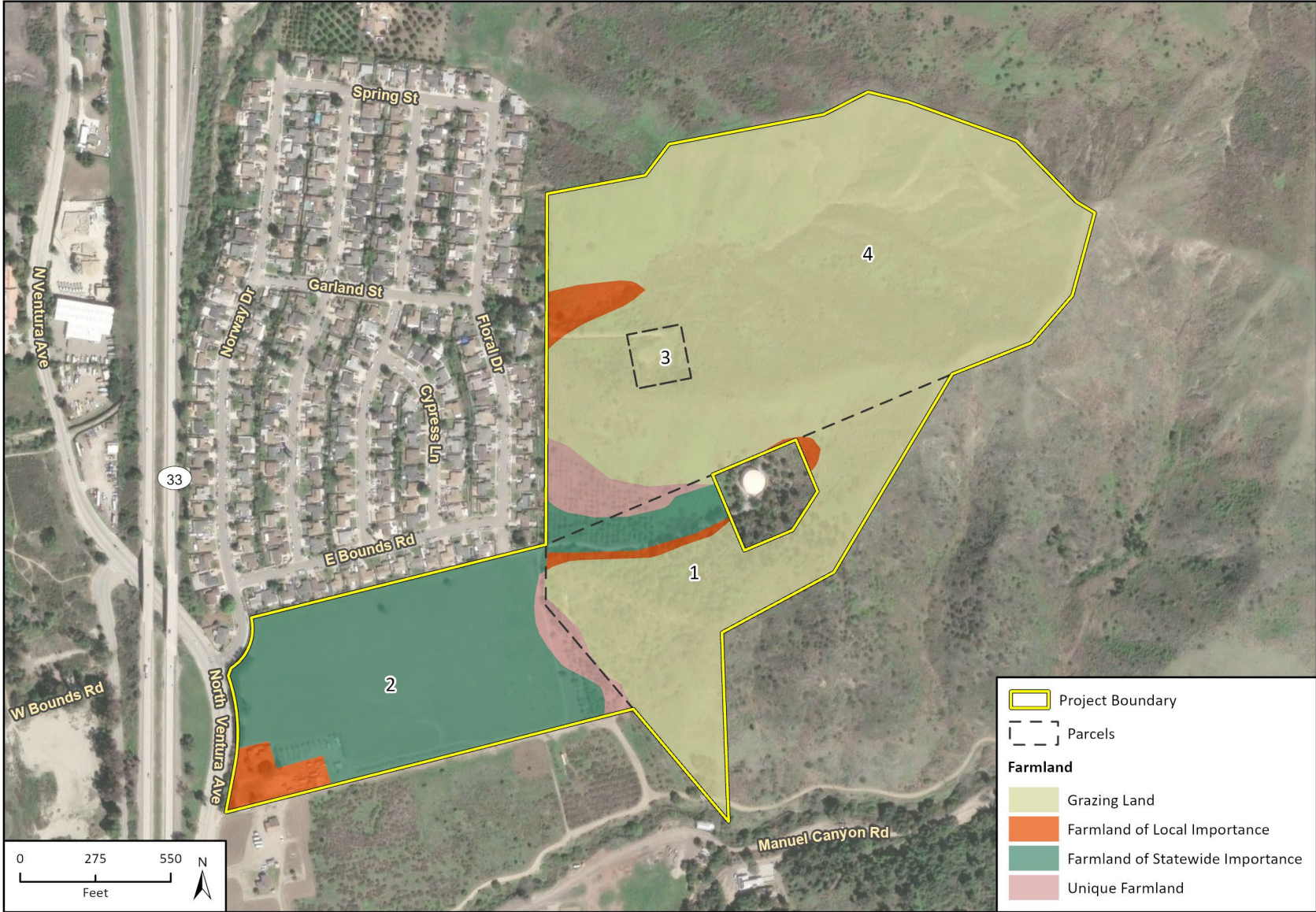
General Plan Land Use Designation	Important Farmland Inventory Classification	Acres of Soil Lost
Agricultural	Prime/Statewide Importance	5
	Unique	10
	Local Importance	15
Open Space/Rural	Prime/Statewide Importance	10
	Unique	15
	Local Importance	20
All Land Use Designations	Prime/Statewide Importance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

The project site is proposed to be divided into four parcels, with the housing complex constructed on three of the parcels and one parcel set aside as a conservation easement. According to the Department of Conservation, the project site contains 19.26 acres of Farmland of Statewide Importance, 2.86 acres of Unique Farmland, and 3.03 acres of Farmland of Local Importance.<sup>4</sup> Figure 11 shows the distribution of these farmland types across the project parcels.

The farmworker housing complex would be developed on Parcels 1, 2, and 3, resulting in the loss of 18.91 acres of agricultural soils designated as Farmland of Statewide Importance and 1.94 acres of soils designated as Farmland of Local Importance, exceeding the County's significance thresholds for the loss of agricultural soils shown in Table 4. Parcel 4 would be set aside as a conservation parcel, conserving approximately 43.8 acres of grazing land, 1.1 acres of Farmland of Local Importance, and 0.4 acres of Farmland of Statewide Importance on that portion of the project site. The existing zoning and General Plan designations for the project site allow for the development of a farmworker housing complex with approval of a Planned Development Permit. The project would support the 2040 General Plan Agricultural objective to promote the economic vitality and environmental sustainability of Ventura County's agricultural economy by conserving soils/land on portions of the project site while supporting a diverse and globally competitive agricultural industry that depends on the availability of farmworker housing.

<sup>4</sup> Department of Conservation. 2025. California Important Farmland Finder. Available: <https://maps.conservation.ca.gov/dlrp/ciff/app/>. Accessed March 2025.

Figure 11 Mapped Farmland on Project Site



Imagery provided by ESRI and its licensors © 2025.  
Additional data provided by California Department of Conservation, 2024. Important Farmland Inventory Data provided by Ventura County, 2025.

24-16460 EPS  
Fig 4 Farmland - Parcels



As previously discussed, the 2040 General Plan EIR identified that implementation of the 2040 General Plan would result in significant and unavoidable impacts related to the conversion of Important Farmland. The 2040 General Plan includes Policy AG-1.8, as required by 2040 General Plan EIR Mitigation Measure AG-1, which stipulates, “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.”

In addition, the 2040 General Plan includes Program AG-O, as required by 2040 General Plan EIR Mitigation Measure AG-2, which states that:

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... Discretionary projects to develop and provide housing for use by farmworkers and their families are not subject to this agricultural conservation easement requirement.

The project would result in the permanent and direct loss of Farmland of Statewide Importance and Farmland of Local Importance exceeding Ventura County’s significance thresholds for agricultural soils. The project would comply with General Plan Policy AG-1.8 to minimize the loss of Important Farmland to the extent feasible by providing a compact site design and setting aside a conservation easement that includes Important Farmland. However, due to the hillside topography of the eastern portion of the project site and availability of existing roadways and utilities infrastructure along the western frontage of the project site, where the Important Farmland on the project site is concentrated, it is not feasible to design the project to fully avoid impacts to Important Farmland. The 2040 General Plan EIR anticipated that significant impacts related to the loss of agricultural soils from farmworker housing could occur and specifically established that a 1:1 conservation easement to mitigate loss of agricultural soils is not applicable to farmworker housing projects. The project would include an on-site conservation easement to preserve grazing land and some of the Important Farmland on the site; however, impacts would still be significant and unavoidable, consistent with the findings of the 2040 General Plan EIR. Therefore, the project would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

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

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not result in significant impacts related to the proximity of non-agricultural land uses to classified farmland, due to existing policies and programs such as the Right-to-Farm Ordinance, Agricultural/Urban Buffer Policy, and the Save Open Space and Agricultural Resources initiative (Impact 4.2-2). The ISAGs state that a significant impact would occur if a project would result in the development of a land use that is not defined as Agriculture or Agricultural Operations in the zoning ordinances adjacent to classified farmland, based on the distances between new non-agricultural structures/uses and any common lot boundary line adjacent to off-site classified farmland. A project that is closer than the distances set forth in Table 5 would be considered to have a potentially significant environmental effect on

agricultural resources, unless certain factors are met or justification exists for a waiver or deviation from these distances.

**Table 5 Thresholds for Evaluation for All Non-Agriculture or Non-Agricultural Operations Projects**

Distance from Non-Agricultural Structure or Use and Common Boundary Line Adjacent to Classified Farmland (feet)	
Without Vegetative Screening	300
With Vegetative Screening	150
New K-12 School	1,320

The nearest offsite classified farmland (Farmland of Local Importance) is located immediately south of the project site. The proposed residential buildings closest to this offsite farmland would be located approximately 70 feet from the boundary of the nearest offsite farmland. The project would include vegetative screening; however, the project would not meet the 150-foot buffer distance threshold established by Ventura County shown in Table 5.

While the project is not classified as Agriculture or Agricultural Operations, it is a permitted use within the OS and AE zones as a residential use supporting agricultural activities, particularly under the provisions for employee housing and farmworker housing in the zoning ordinance. Additionally, per the ISAGs, if the non-agricultural use is a farmworker or other housing complex with a functional notification and response plan for the use of restricted materials on or off-site within 300 feet of the housing, impacts would be less than significant. The project is a farmworker housing project, and pursuant to the County's standard conditions of approval, the project would implement a Notification and Response Plan (Condition of Approval No. C-29) to reduce potential conflicts with nearby agricultural operations. As such, the project would not result in agricultural land use incompatibility, and impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR identified that impacts related to agricultural land use incompatibility would be less than significant and the project would result in less than significant impacts related to this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*c. Conflict with existing zoning for agricultural use or a Williamson Act contract?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not conflict with Williamson Act Contracts or Agricultural Preserves (Impact 4.2-3); this impact was identified as less than significant. The 2040 General Plan EIR identified that the Land Conservation Act establishes eligibility criteria for Agricultural Preserves and Land Conservation Act Contracts in the plan area. Ventura County's Save Open Space and Agricultural Resources ordinance requires countywide voter approval of most changes to the 2040 General Plan involving Agricultural, Open Space, or Rural land use designations and most changes to a 2040 General Plan goal or policy related to those land use designations. These protections would ensure that 2040 General Plan implementation would result in less than significant impacts related to conflicts with agricultural zoning and Williamson Act contracts.

The project site is not under a Williamson Act contract, and, therefore, not subject to the provisions of the Williamson Act.<sup>5</sup> While the project site is adjacent to a property that is under a Williamson Act contract, the project would not conflict with the purposes or requirements of the Act. The project does not propose any use or activity that would interfere with the agricultural operations or land conservation goals of the adjacent Williamson Act property. As such, no conflict with the Williamson Act is anticipated.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to a conflict with existing zoning for agricultural use or a Williamson Act contract, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*d. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

*e. Result in the loss of forest land or conversion of forest land to non-forest use?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not conflict with or result in a loss of land zoned as forestland, timberland, or Timberland Production Zone (Impact 4.2-4); this impact was identified as less than significant. Ventura County does not contain land that produces timber commercially for use as lumber or pulp; however, there are six Christmas tree farms totaling approximately 94 acres that are zoned Timber-Preserve (T-P) pursuant to the provisions of the Timberland Preserve Zone of the NCZO.

The project site is not zoned as forest land (as defined in Public Resources Code (PRC) section 12220(g), timberland (as defined in PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 4526). The project site is zoned with a mix of Open Space (OS) and Agricultural Exclusive (AE)-40. Land uses surrounding the project site include residential properties to both the north and south, open space to the west, and agriculture to the east. No impacts associated with forest land, timberland, or timberland zoned as Timberland Production would occur. Therefore, the project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland-zoned Timberland Production or result in the loss of forest land or conversion of forest land to non-forest use, and the impact would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to forest land or conversion of forest land to non-forest use, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

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<sup>5</sup> Department of Conservation. 2025. Williamson Act Enrollment Finder. Available: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html>. Accessed June 2025

- f. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not be expected to result in adverse impacts to agricultural uses by locating non-agricultural development near classified farmland due to policies and programs that limit conflicts to agricultural uses, establish buffers between crop production, orchard production, classified farmland, and nonagricultural uses, to minimize agricultural land conversion (Impact 4.2-2); this impact was identified as less than significant.

The project site is surrounded by residential developments, agricultural uses, and open space lands. As described above under *Impact 2b.*, the project would have less than significant impacts related to agricultural land use compatibility. The project would establish vegetative screening between the project site and farmland and agricultural uses to the south, to minimize the potential for agricultural land conversion. Additionally, urban services (e.g., water, sewer, electricity) already exist in the area and would not need to be extended or expanded to accommodate the project. As such, the project would not induce growth into agricultural areas through the extension or expansion of utilities. Therefore, the project would not involve other changes that could result in the conversion of Farmland to non-agricultural use. Impacts would be less than significant.

The project site is not located on or adjacent to forest land, nor is it designated as forest land under the 2040 General Plan or zoning ordinance. Therefore, the project would not involve changes in the existing environment that could result in the conversion of forest land to non-forest use, and the impact would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use, and the project would not result in a significant impact for this topic. The project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

Mitigation measures identified in the 2040 General Plan EIR are not applicable to the project. The following uniformly applied development policies or standards would be incorporated into the project:

- **2040 General Plan Policy AG-1.1: Agricultural Land Protection and Preservation:** The County shall continue to protect and preserve agricultural land by directing growth away from productive agricultural lands into cities, unincorporated urban areas, or existing communities and by supporting the acquisition or voluntary dedication of agriculture conservation easements.
- **2040 General Plan 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.

**Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

**Condition of Approval Number C-29: Notification and Response Plan**

Prior to the use inauguration of the requested Zoning Clearance, the Permittee is required to prepare a Notification and Response Plan, subject to approval by Ventura County Department of Agriculture/Weights & Measures (AWM). Any proposed changes to the Notification and Response Plan must be submitted to AWM for approval. The Notification and Response Plan must indicate how associated persons are to be notified that normal farming operations may cause nuisances such as dust or noise, and that the use of fertilizers and/or chemical pest controls may occur in the vicinity. The Notification and Response Plan must indicate how associated persons will be instructed to respond in the rare event that adjacent agricultural operations present a hazard to said persons. The Permittee is recommended to contact adjacent growers to exchange information about agricultural operations that may be scheduled and make this information available to associated persons.

### 3 Air Quality

#### Summary of Findings

With regard to air quality, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. Mitigation measures identified in the 2040 General Plan EIR would be applicable.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts to air quality.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>3. Air Quality</b>						
Would the project:						
a. Conflict with or obstruct implementation of the applicable air quality plan?	GP EIR pp. 4.3-11 to 4.3-12 Impact 4.3-1	No	No	No	No	N/A
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	GP EIR pp. 4.3-12 to 4.3-19 Impact 4.3-2 Impact 4.3-3	No	No	No	No	Yes
c. Expose sensitive receptors to substantial pollutant concentrations?	GP EIR pp. 4.3-19 to 4.3-23 Impact 4.3-4 Impact 4.3-5	No	No	No	No	Yes
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	GP EIR pp. 4.3-23 to 4.3-24 Impact 4.3-6	No	No	No	No	N/A



## Discussion

### *a. Conflict with or obstruct implementation of the applicable air quality plan?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not conflict with or obstruct the 2016 Ventura County Air Quality Management Plan (AQMP), because the County's projected population growth is lower than the AQMP's assumptions and the 2040 General Plan includes policies that support the AQMP's ozone control strategies (Impact 4.3-1). The 2040 General Plan EIR identified that 2040 General Plan Policies HAZ-10.2, HAZ-10.3, CTM-4.2, CMT-2.1 through CTM-2.25, CTM-3.1 through CTM-3.8, CTM-4.1, and CTM-4.3 would ensure consistency with the 2016 Ventura County AQMP. These policies would prohibit discretionary development that is inconsistent with the 2016 AQMP, require all discretionary development to comply with all applicable Ventura County Air Pollution Control District (VCAPCD) rules and permit requirements, reduce vehicle trips through increasing the availability of alternative modes, and accommodating the infrastructure needed to encourage bicycling and walking, and reduce vehicle miles traveled (VMT). This impact was determined to be less than significant.

The most current air quality plan adopted by VCAPCD is the Ventura County 2022 Air Quality Management Plan (2022 AQMP), adopted On December 13, 2022. The VCAPCD adopted the 2022 AQMP to demonstrate a strategy for, as well as reasonable progress toward, attainment of the federal 8-hour ozone standard. The emission inventories used to develop this plan are based primarily on projected population and employment growth and associated VMT in the region based on data provided within the Southern California Association of Governments (SCAG) 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). This growth is estimated for the region based, in part, on the planned growth identified in regional and local land use plans such as general plans or distinct area plans. According to VCAPCD's guidelines, a project may be inconsistent with the applicable air quality plan if it would cause the existing population to exceed forecasts contained in the most recently adopted AQMP.<sup>6</sup>

According to SCAG, unincorporated Ventura County's population in 2019 was 93,700 with projected growth of 7,600 persons to 101,300 by 2045. Employment in 2019 was 31,500 with projected growth of 5,400 employees by 2045 to 36,900.<sup>7,8</sup> According to the California Department of Finance (DOF), unincorporated Ventura County has an estimated 2.75 persons per household.<sup>9</sup> The project would result in approximately 902 additional residents based on the DOF estimate of persons per household for Ventura County. This would fall within the 7,600 additional residents in unincorporated Ventura County anticipated between 2019 and 2045. Additionally, the project would result in up to 20 full-time employees (assumed from the size of community centers and maintenance buildings). This would fall well within the 5,400-employee growth projected in unincorporated Ventura County between 2019 and 2045.

<sup>6</sup> VCAPCD. 2003. Air Quality Assessment Guidelines. Available: <http://www.vcapcd.org/pubs/Planning/VCAQGuidelines.pdf>. Accessed August 2025.

<sup>7</sup> SCAG. 2020. Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. Available: [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan\\_0.pdf?1606001176](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176). Accessed August 2025.

<sup>8</sup> SCAG. 2024. Connect SoCal: The 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. Available: <https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf>. Accessed August 2025.

<sup>9</sup> DOF. 2025. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2025. Available: <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025//> Accessed September 2025.

As previously discussed, the 2040 General Plan EIR identified that implementation of the 2040 General Plan would result in less than significant impacts related to consistency with applicable air quality plans. The project would not exceed the population or employment growth forecasts used in the 2022 AQMP and would be consistent with the ozone control strategy, and impacts would be less than significant. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

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

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would result in a cumulatively considerable net increase of criteria air pollutants due to the County's nonattainment status (Impact 4.3-2). Impact 4.3-2 of the 2040 General Plan EIR evaluated impacts related to construction that could occur with implementation of the 2040 General Plan, while Impact 4.3-3 evaluated impacts related to operational emissions from implementation of the 2040 General Plan. To remain consistent with the most current CEQA Guidelines Appendix G checklist, these impacts are evaluated together under the single impact criteria "result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard."

According to Impact 4.3-2, Policy HAZ-10.3 of the 2040 General Plan would reduce construction emissions by requiring all discretionary projects to comply with applicable VCAPCD rules, including Rule 51 (Nuisance), Rule 50 (Opacity), and Rule 55 (Fugitive Dust); Policy COS-8.7 would additionally promote sustainable building practices to reduce energy associated with construction. Impact 4.3-2 identified that, although fugitive dust emissions would be reduced through mitigation, respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less (PM<sub>10</sub>) emissions could still occur from the construction of individual development projects. Because Ventura County is in nonattainment for PM<sub>10</sub> with respect to the California Ambient Air Quality Standards (CAAQS), construction emissions under the 2040 General Plan were found to potentially exacerbate this existing air quality condition. Despite the application of General Plan EIR Mitigation Measures AQ-1a, AQ-1b, AQ-2a, and AQ-2b, which establish new 2040 General Plan policy and implementation programs that direct discretionary development to implement feasible construction air pollutant best management practices (BMPs), ozone precursor emissions were estimated to remain above recommended thresholds, and due to Ventura County's nonattainment designation for ozone with respect to the National Ambient Air Quality Standards (NAAQS) and CAAQS, this impact was concluded to be significant and unavoidable.

Regarding operational air pollutant emissions, Impact 4.3-3 of the 2040 General Plan EIR identified policies within the 2040 General Plan that would reduce emissions of air pollutants associated with individual development projects. 2040 General Plan Policies HAZ-10.5, HAZ-10.6, HAZ-10.12, COS-7.7, COS-7.8, CTM-2.11, CTM-2.13, CTM-3.1, CTM-4.1, CTM-4.2, and CTM-6.1 would reduce operational emissions through actions such as requiring that discretionary development with significant adverse air quality impacts only be approved if it is conditioned with all reasonable mitigation measures to avoid, minimize, or compensate for the impact; require that gases emitted from all new discretionary oil and gas wells be collected and used or removed for sale or proper disposal; reducing VMT through land use planning and the availability of alternative transportation options; and encouraging trips made by biking, walking, and public transportation, which would reduce vehicular trips and thus reduce mobile-source air pollutant emissions. Impact 3.4-3 concluded that because Ventura County

is in nonattainment for ozone with respect to the CAAQS and NAAQS and is in nonattainment for PM<sub>10</sub> with respect to the CAAQS, future development under the 2040 General Plan could contribute to the existing nonattainment status and result in a significant and unavoidable impact.

The attainment status of Ventura County for the NAAQS and CAAQS has not changed since the certification of the 2040 General Plan EIR, and Ventura County is still in nonattainment for ozone and PM<sub>10</sub> with respect to the CAAQS and ozone with respect to the NAAQS. An Air Quality and Greenhouse Gas Emissions Study was completed for the project in September 2025 and reviewed and approved by VCAPCD (Appendix A). The VCAPCD Air Quality Assessment Guidelines establish CEQA significance thresholds of 25 pounds-per-day for reactive organic compounds (ROC) and nitrogen oxides (NO<sub>x</sub>), which are key contributors to ozone formation. The Air Quality Assessment Guidelines state:

Construction-related emissions (including portable engines and portable engine-driven equipment subject to the ARB's Statewide Portable Equipment Registration Program, and used for construction operations or repair and maintenance activities) of ROC and NO<sub>x</sub> are generally not counted toward the two significance thresholds because these emissions are temporary. Therefore, construction-related emissions should be mitigated if estimates of ROC and NO<sub>x</sub> emissions from heavy-duty construction equipment anticipated for a particular project exceed the 5 pounds per day threshold in the Ojai Planning Area or the 25 pounds per day threshold in the remainder of the county.

The Air Quality and Greenhouse Gas Emissions Study found that construction activities associated with the project could potentially exceed the VCAPCD's recommended limit of 25 pounds per day for ROC and NO<sub>x</sub> (Appendix A). Specifically, unmitigated emissions could reach up to 34 pounds per day for ROC and 29 pounds per day for NO<sub>x</sub>. These exceedances were primarily attributed to off gassing from architectural coatings and exhaust from diesel-powered construction equipment. To address this, the project would incorporate Mitigation Measures AQ-1 and AQ-2 to provide project-specific construction BMPs, as required by General Plan Policy HAZ-10.13 and Implementation Program HAZ-Y. These BMPs include the use of Tier 4 Final diesel equipment, electric alternatives, and low-ROC coatings with extended application schedules. With these measures in place, emissions would be reduced to 24.6 pounds per day for ROC and 8 pounds per day for NO<sub>x</sub>, bringing them below the VCAPCD thresholds and rendering the construction-related air quality impacts less than significant. Operational emissions were also evaluated and found to be well within the thresholds established by VCAPCD, with maximum daily emissions of approximately 17 pounds per day of ROC and 6 pounds per day of NO<sub>x</sub>, indicating no long-term air quality concerns from the project.

Furthermore, the project would be required to adhere to General Plan Policy HAZ-10.5 and other applicable policies and implementation programs from the 2040 General Plan, which were established to reduce construction and operational air pollutant emissions. Emissions of air pollutants would be further reduced through compliance with VCAPCD rules relating to construction dust (Condition of Approval No. A-21). These requirements include minimizing the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust, limiting construction-related traffic to 15 miles per hour or less, and discontinuing all clearing, grading, earth moving, or excavation activities during periods of high winds. Emissions of air pollutants would also be reduced through compliance with State laws and VCAPCD requirements regarding construction equipment emissions of ozone precursors and diesel PM (Condition of Approval No. A-22). These requirements include compliance with the California State Regulation for In-Use Off-Road Diesel Vehicles (Title 13, CCR Section 2449) to reduce NO<sub>x</sub> and diesel PM exhaust emissions, compliance with the vehicle idling limits of Title 13, CCR Section 2485, Section 2449(d)(3), and

lengthening the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time.

As previously discussed, the 2040 General Plan EIR identified that implementation of the 2040 General Plan could result in significant and unavoidable impacts related to construction and operational emissions of criteria air pollutants, particularly ozone precursors and PM<sub>10</sub>, due to the County's nonattainment status. The project would implement mitigation measures to reduce construction emissions below VCAPCD thresholds and would result in operational emissions well within acceptable limits. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*c. Expose sensitive receptors to substantial pollutant concentrations?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could potentially expose sensitive receptors to substantial pollutant concentrations, particularly toxic air contaminants (TACs) from construction and operational activities. However, with implementation of mitigation measures such as increased setbacks from major roadways and requirements for health risk assessments these impacts would be reduced to less than significant (Impact 4.3-6). Impact 4.3-4 of the 2040 General Plan EIR evaluated impacts related to carbon monoxide (CO) emissions, while Impact 4.3-5 of the 2040 General Plan EIR addressed impacts related to TACs. To remain consistent with the most current CEQA Guidelines Appendix G checklist, these impacts are evaluated under the single impact criteria "[e]xpose sensitive receptors to substantial pollutant concentrations." This impact analysis focuses specifically on the potential for sensitive receptors to be exposed to project-generated TACs (pollutants that may cause serious, long-term effects, such as cancer, even at low levels), and CO in the form of CO hotspots. CO is a pollutant of localized concern due to its highly dispersive properties and typically only poses a serious health risk when concentrated to a small area, known as a "hotspot" which occurs when CO emissions in a localized area exceed the limits of the NAAQS and/or CAAQS, which are scientifically substantiated in protecting human health. Sensitive receptors (e.g., children, the elderly, asthmatics, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution) are the populations at the greatest risk of experiencing negative health effects related to exposure to these pollutants, which themselves are considered to pose the highest risk to human health among air pollutants.

Regarding CO emissions, the analysis in Impact 4.3-4 of the 2040 General Plan EIR evaluated CO emissions based on guidance available from VCAPCD as well as the numerical CO threshold of 550 pounds per day (lb/day), recommended by South Coast Air Quality Management District (SCAQMD) and utilized in the 2040 General Plan EIR analysis. Impact 4.3-4 stated that individual discretionary projects implemented under the 2040 General Plan would be dispersed throughout the unincorporated county, and because mobile-source CO emissions from the 2040 General Plan were shown would not exceed the SCAQMD-recommended screening threshold of 550 lb/day, local mobile-source CO emissions generated by future development that could be accommodated under the 2040 General Plan would not result in or substantially contribute to concentrations of CO that exceed the 1-hour or 8-hour CAAQS and NAAQS. Impact 4.3-4 therefore concluded that CO-related impacts would be less than significant.

Regarding construction-related TACs, Impact 4.3-5 stated that, due to the long-term project horizon of 2040 and distribution of construction activities throughout the county, it is unlikely that any one sensitive receptor would be exposed to construction-related TACs for extended periods of time and

construction activities would not result in the exposure of existing or new sensitive receptors to a substantial increase in TAC emissions. Regarding operational TACs, Impact 4.3-5 stated that despite potentially significant TAC emissions related to new sensitive receptors that could be exposed to roadway traffic levels that could result in adverse health effects from TACs, implementation of Mitigation Measure AQ-3 would reduce this impact by requiring that new sensitive receptors not be located within 500 feet of any freeway, urban, or rural roadways experiencing traffic volumes that exceed 100,000 and 50,000 vehicles per day, respectively, which is the CARB-recommended setback distance (CARB 2005: 10), unless a site-specific VCAPCD-approved HRA shows that associated levels of cancer risk at the sensitive receptors would not exceed 10 in 1 million. It was determined this impact was less than significant with mitigation incorporated.

The nearest offsite sensitive receptors to the project are single-family residences directly adjacent to the northern and southern boundaries of the project site, and onsite sensitive receptors would be introduced during all phases of construction. Regarding project-related TACs, construction of the project would involve the use of diesel-powered equipment that emits diesel particulate matter (DPM), the primary pollutant of concern when discussing construction-related TACs. The Air Quality and Greenhouse Gas Emissions Study prepared for the project included a Health Risk Assessment which analyzed the potential for construction to result in significant impacts to offsite and onsite sensitive receptors, as well as an assessment for the project to result in CO hotspot-related impacts and impacts related to San Joaquin Valley Fever (Appendix A). As described therein, with compliance with VCAPCD regulations and implementation of project-specific construction BMPs as required by 2040 General Plan Policy HAZ-10.13 and Implementation Program HAZ-Y (via mitigation measures AQ-1 and AQ-2), project construction would result in less than significant impacts to on and offsite sensitive receptors from TAC emissions during construction. The project would not include any substantial sources of mobile or stationary air pollutant emissions once operational, and operational TAC emissions would result in less than significant impacts to sensitive receptors.

Regarding CO hotspots, the South Central Coast Air Basin has been in attainment for CO ambient air quality standards since 2004 and the CO levels in Ventura County have been historically low enough that VCAPCD monitoring stations throughout the County ceased monitoring ambient CO concentrations in 2004. Furthermore, as identified in the Traffic Impact Assessment prepared by TJW Engineering, Inc. in March 2024, no studied intersection would operate at a LOS below C with the implementation of the project (Appendix B). Because ambient CO concentrations in the County are relatively low, and because the project would not result in a substantial addition of traffic or congestion to any area intersection (especially not any high-volume or already-congested intersections), the project would not result in a CO hotspot. Therefore, impacts to sensitive receptors from CO would be less than significant.

Although not a CEQA issue, according to the 2040 General Plan, discretionary developments that include sensitive receptors should be located at least 1,000 feet from roads with traffic volumes exceeding 50,000 vehicles per day. If a project proposes sensitive land uses within this 1,000-foot buffer, a site specific HRA is required. The project is located approximately 150 feet east of SR 33, therefore a Mobile Health Risk Assessment for the project site was conducted by Meridian Consultants in May 2025 (Appendix C). As identified in the Mobile Health Risk Assessment, risk to onsite residents without the incorporation of MERV 13 filters would result in a cancer risk of 3.64 per million which is below the 10 in one million threshold. Maximum non-cancer chronic risk would be 0.0042 which is less than the VCAPCD's chronic hazard index of 1. The project would incorporate MERV 14 filters as noted in the Project Description, which would be anticipated to further reduce

health risk. Therefore, the project's proximity to SR 33 would result in less than significant health impacts for onsite residents.

Regarding San Joaquin Valley Fever, construction activities, including site preparation and grading, would have the potential to release *Coccidioides immitis* spores. Substantial increases in the number of reported cases of Valley Fever tend to occur only after major ground-disturbing events such as the 1994 Northridge earthquake.<sup>10</sup> Additionally, the population of Ventura County has been and would continue to be exposed to Valley Fever from agricultural and construction activities occurring throughout the region, not just from construction of the project. Construction of the project would not result in a major ground disturbance, and because of compliance with VCAPCD Rule 55 (Fugitive Dust), the project would not release a large number of spores should any be present on the site. Furthermore, the project would involve grading of previously disturbed agricultural soils, which limits the deposit of fungal spores. It is anticipated that construction workers would be from the local or regional area and would therefore have previous exposure to and immunity from Valley Fever. Compliance with VCAPCD Rule 55 (Fugitive Dust) would require daily site watering, which would keep soil moist and limit dust generation. Therefore, construction of the project would not result in a substantial increase in entrained fungal spores that cause Valley Fever above existing background levels. Impacts related to Valley Fever would be less than significant.

As previously discussed, the 2040 General Plan EIR identified that implementation of the 2040 General Plan would result in less than significant impacts related to exposure of sensitive receptors to substantial pollutant concentrations with implementation of mitigation. The project would result in less than significant impacts to sensitive receptors during construction and operation with compliance with VCAPCD rules, standard County conditions of approval, and 2040 General Plan Policy HAZ-10.13 and Implementation Program HAZ-Y through implementation of Mitigation Measures AQ-1 and AQ-2. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would result in less than significant impacts related to construction and operational odors. Construction-related odors would be temporary and localized, while operational odors from new development would be regulated through existing policies (Impact 4.3-6). The analysis concluded that because odors have a localized impact and construction activities related to the implementation of the 2040 General Plan would occur sporadically throughout the county, construction odors, specifically those from diesel exhaust, would be less than significant. Regarding operations, Impact 4.3-6 concluded that operational odors would also be less than significant because the Land Use and Community Character Element of the 2040 General Plan includes land use compatibility policies that would reduce potential impacts from receptors near existing odors sources. Additionally, VCAPCD Rule 51 (Nuisance), which regulates nonagricultural uses that potentially emit odors, would further reduce the potential for odor impacts on existing and new sensitive receptors in the county.

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<sup>10</sup> Ventura County Air Pollution Control District (VCAPCD). 2003. Ventura County Air Quality Assessment Guidelines. October 2003. Available: <http://www.vcapcd.org/pubs/Planning/VCAQGuidelines.pdf>. Accessed August 2025.



Odors associated with diesel exhaust emissions from construction equipment may occasionally be noticeable by nearby receptors. However, odors would be intermittent and temporary and would dissipate rapidly from the source with an increase in distance. Further, as required by 13 CCR Section 2449(d)(3), no in-use off-road diesel vehicles may idle for more than five consecutive minutes. Therefore, it is not expected that significant odor impacts could occur from project construction. The project would consist of residential uses, community centers, and open space amenities. These land uses are not associated with substantial odor emissions. Thus, the project would not result in any major source of odors or involve the operation of any common types of facilities known to produce odors (e.g., landfills and wastewater treatment plants). Operational impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR identified that implementation of the 2040 General Plan would result in less than significant impacts related to construction and operational odors. The project would generate temporary and intermittent construction odors and would not include operational uses typically associated with substantial odor emissions. Project impacts related to odors would be less than significant. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

In accordance with Mitigation Measures AQ-1a and AQ-1b of the 2040 General Plan EIR, the following project-specific mitigation measures would be implemented to establish construction BMPs to reduce air pollutant emissions during project construction:

<b>MM AQ-1</b>	<b>Construction Equipment Emissions Reduction</b>
<b>Purpose</b>	Reduction of air pollutant emissions during project construction
<b>Description</b>	<p>Prior to issuance of demolition and grading permits, the following measures shall be noted on all construction plans:</p> <p>All mobile off-road equipment (wheeled or tracked) used during construction activities shall meet the USEPA Tier 4 final standards. Tier 4 certification can be for the original equipment or equipment that is retrofitted to meet the Tier 4 final standards.</p> <p>Alternative Fuel (natural gas, propane, electric, etc.) construction equipment shall be incorporated where available.</p> <p>Electricity shall be supplied to the site from the existing power grid to support the electric construction equipment. If connection to the grid is determined to be infeasible for portions of the project, a non-diesel fueled generator shall be used.</p> <p>The project shall comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation.</p> <p>These requirements shall also be incorporated into the contract agreement with the construction contractor. A copy of the equipment's certification or model year specifications shall be available upon request for all equipment onsite.</p>
<b>Implementation Responsibility</b>	Planning Division
<b>Documentation</b>	Mitigation Measure AQ-1 shall be included on the notes for all grading and construction plans. Additionally, each construction equipment unit's certified tier specification shall be documented.

<b>MM AQ-1 Construction Equipment Emissions Reduction</b>	
<b>Timing</b>	Prior to the issuance of a Zoning Clearance for construction, the applicant shall submit grading and construction plans and each construction equipment unit's certified tier specification to the Planning Division for review and approval. The applicant shall implement Mitigation Measure AQ-1 throughout the duration of project construction activities.
<b>Monitoring and Reporting</b>	Prior to issuance of the Zoning Clearance for construction, the Planning Division will review the grading and construction plans and equipment tier specifications for compliance with this measure. County staff have the authority to inspect the project site during construction to ensure compliance with the listed requirements of the MMRP.

<b>MM AQ-2 Architectural Coating Emissions Reduction</b>	
<b>Purpose</b>	Reduction of reactive organic compounds (ROC) emissions during project construction
<b>Description</b>	<p>In order to reduce emissions from architectural coating, the following mitigation measures shall be implemented and, prior to issuance of demolition and grading permits, noted on all construction plans:</p> <p>All interior and exterior surfaces constructed in Phase 2 shall use coatings with no more than 10 grams per liter of ROCs, or the architectural coating phase shall last a minimum of 32 days.</p> <p>Phase 3 architectural coating shall last a minimum of 40 days using coatings with no more than 10 grams per liter of ROCs, or alternatively, the architectural coating phase shall last a minimum amount of 42 days.</p> <p>To verify compliance, the construction contractor shall submit architectural coating schedules for construction Phase 2 and Phase 3 to the Planning Division prior to the commencement of architectural coating activities.</p>
<b>Implementation Responsibility</b>	Planning Division
<b>Documentation</b>	The ROC content of architectural coatings (e.g., through product labels or safety data sheets) shall be documented. The schedule for the architectural coating of buildings constructed in Phase 2 and Phase 3 will also be documented.
<b>Timing</b>	Prior to the issuance of a zoning clearance for construction of Phases 2 and 3, the applicant shall submit the architectural coating ROC documentation and architectural coating schedules to the Planning Division for review and approval. The applicant shall implement Mitigation Measure AQ-2 throughout the duration of Phase 2 and Phase 3 of construction.
<b>Monitoring and Reporting</b>	Prior to the issuance of a zoning clearance for construction of Phases 2 and 3, the Planning Division will review the architectural coating documentation for compliance with this measure. County staff have the authority to inspect the project site during construction to ensure compliance with the listed requirements of the MMRP.

Additionally, the following uniformly applied development policies or standards would be incorporated into the project:

- **2040 General Plan Policy HAZ-10.13: Construction Air Pollutant Best Management Practices.** Discretionary development projects that will generate construction-related air emissions shall be required by the County to incorporate best management practices (BMPs) to reduce emissions. These BMPs shall include the measures recommended by VCAPCD in its Air Quality Assessment Guidelines or otherwise to the extent applicable to the project.
- **2040 General Plan Policy HAZ-10.14: Fugitive Dust Best Management Practices.** The County shall ensure that discretionary development which will generate fugitive dust emissions during construction activities will, to the extent feasible, incorporate appropriate BMPs to reduce emissions to be less than applicable thresholds.

- **2040 General Plan Implementation Program HAZ-Y: Construction Air Pollutant Best Management Practices.** Discretionary development projects that will generate construction-related air emissions 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 feasible using electric-powered or other alternative fueled equipment in place of diesel powered equipment.
- **2040 General Plan Implementation Program HAZ-Z: Fugitive Dust Best Management Practices.** Discretionary development projects that will generate construction-related fugitive dust emissions shall be required by the County to include dust reduction measures recommended by VCAPCD in its Air Quality Assessment Guidelines, or otherwise.
- **VCAPCD Rules and Regulations:** which include but are not limited to, Rule 50 (Opacity), Rule 51 (Nuisance), and Rule 55 (Fugitive Dust).

### **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

#### **Condition of Approval Number A-21: Emission Reduction Measures – Construction**

The Permittee shall comply with the emission reduction measures as recommended by the Air Pollution Control District and methodology contained in the Ventura County Air Quality Assessment Guidelines for construction emission reduction measures.

#### **Condition of Approval Number A-22: Dust During Construction**

The Permittee shall comply with the provisions of applicable VCAPCD Rules and Regulations, which include but are not limited to, Rule 50 (Opacity), Rule 51 (Nuisance), and Rule 55 (Fugitive Dust).

## 4 Biological Resources

### Summary of Findings

With regard to Biological Resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. Mitigation measures contained within the 2040 General Plan EIR would be applicable.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts to biological resources.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>4. Biological Resources</b>						
Would the project:						
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	GPEIR pp. 4.4-20 to pp. 4.4-25 Impact 4.4-1	No	No	No	No	Yes
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	GPEIR pp. 4.4-25 to pp. 4.4-28 Impact 4.4-2	No	No	No	No	N/A

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	GPEIR pp. 4.4-28 to pp. 4.4-30 Impact 4.4-3	No	No	No	No	N/A
d. Interfere with habitat connectivity by: 1. Removing habitat within a wildlife movement corridor? 2. Isolating habitat? 3. Construct or create barriers that impede fish and/or wildlife movement, migration or long-term connectivity or interfere with wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction? 4. Intimidate fish or wildlife via the introduction of noise, light, development or increased human presence?	GPEIR pp. 4.4-30 to pp. 4.4-33 Impact 4.4-4	No	No	No	No	N/A
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	GP EIR pp. 4.4-33 to pp. 4.4-34 Impact 4.4-5	No	No	No	No	Yes
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	GP EIR p.4.4-14	No	No	No	No	N/A

## Discussion

- a. *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in adverse effects to special-status species (Impact 4.4-1). Although the implementation of Mitigation Measure BIO-1, which requires Ventura County to include a program in the 2040 General Plan to update the ISAG Biological Assessment report criteria to evaluate discretionary development that could potentially impact sensitive biological resources, would reduce impacts to special-status species and habitats, the wide variety of future project types, site conditions, and other circumstances associated with future development may have project-specific instances where Mitigation Measure BIO-1 would not reduce impacts. The 2040 General Plan concluded that there were no additional actions or policies that the General Plan could feasibly mandate to fully protect special-status species and habitats; the 2040 General Plan EIR concluded this impact to be significant and unavoidable.

The project site is located on a vacant, undeveloped open space that includes an orchard, accessory structures (e.g., barns and storage buildings), and a single-family residence with a covered patio and a detached garage. An Initial Study Biological Assessment (ISBA) was prepared by Padre Associates, Inc. in July 2024 and peer reviewed by Rincon (Appendix D). Site visits were conducted on May 2, 2024, June 5, 2024, June 19, 2024, and July 12, 2024, to perform botanical, wildlife, wetlands, and protected tree surveys, as well as protocol surveys for Crotch's bumblebee. The ISBA concluded that no endangered, threatened, or rare species were observed or anticipated to occur within the survey areas or project grading limits. While some special-status species were observed, the project would not result in the loss of suitable habitat for these species. Potential impacts to nesting migratory birds would be addressed with Mitigation Measure BIO-1 to avoid impacts during vegetation clearing and grading activities. In addition, Mitigation Measure BIO-2 would help prevent the take of nesting migratory birds on and near the project site. With implementation of the proposed mitigation measures, the project would not have a substantial adverse effect on any candidate, sensitive, or special status species. Therefore, the project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, and the impact would be less than significant with mitigation.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact related to the loss of special-status species and habitat; however, the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in disturbance or loss of riparian habitat, sensitive plan communities, Environmentally Sensitive Habitat Areas (ESHA), coastal beaches, sand dunes, and other sensitive natural communities (Impact 4.4-2).



Although the implementation of Mitigation Measure BIO-1, which requires the County to include a program in the 2040 General Plan to update the ISAG Biological Assessment report criteria to evaluate discretionary development that could potentially impact sensitive biological resources, would lessen potential impacts, the wide variety of future project types, site conditions, and other circumstances associated with future development may have project-specific instances where Mitigation Measure BIO-1 would not reduce impacts. The 2040 General Plan EIR concluded no additional actions or policies that the 2040 General Plan could feasibly mandate to fully protect sensitive habitats; this impact was concluded to be significant and unavoidable.

The project site contains several sensitive natural communities, including California brittle bush scrub and southern California black walnut woodland in portions of Parcel 4; however, no development is proposed within these areas, and this parcel would be preserved under an open space or conservation easement. The site does not contain riparian habitat as defined by local or state agencies, and no ESHA, coastal beaches, or sand dunes are present. Additionally, the site has been previously disturbed by agricultural and ranching activities. Based on field surveys and habitat mapping, the project would not result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, the impact would be less than significant.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact related to disturbance or loss of riparian habitat, sensitive plan communities, ESHA, and other sensitive natural communities; however, the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- c. *Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in potential disturbance or loss of State or federally protected wetlands (Impact 4.4-3). Although the implementation of Mitigation Measure BIO-1, which required the County to include a program in the 2040 General Plan to update the ISAG Biological Assessment report criteria to evaluate discretionary development that could potentially impact sensitive biological resources, would lessen potential impacts, the wide variety of future project types, site conditions, and other circumstances associated with future development may have project-specific instances where Mitigation Measure BIO-1 would not reduce impacts. The 2040 General Plan concluded that there were no additional actions or policies that the 2040 General Plan could feasibly mandate to fully protect wetlands or other waters; this impact was concluded to be significant and unavoidable.

Two wetland features were identified on the project site; however, both are located over 400 feet from the proposed development footprint and would be entirely avoided during construction and operational activities of the project. While these wetlands fall under the jurisdiction of the California Department of Fish and Wildlife, U.S. Army Corps of Engineers, or Regional Water Quality Control Board, the project has been designed to maintain substantial buffers and avoid any encroachment. The wetlands are located within the conservation easement that would be established by the project, thereby ensuring their long-term protection. Therefore, the project would not result in a substantial

adverse effect on state or federally protected wetlands through direct removal, filling, or hydrological interruption. As such, there would be no impact.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact related to disturbance or loss of wetlands or other waters; however, the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*d. Interfere with habitat connectivity by:*

- 1. Removing habitat within a wildlife movement corridor?*
- 2. Isolating habitat?*
- 3. Construct or create barriers that impede fish and/or wildlife movement, migration or long-term connectivity or interfere with wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction?*
- 4. Intimidate fish or wildlife via the introduction of noise, light, development or increased human presence?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in the interference of resident or migratory wildlife movement corridors or native nursery sites (Impact 4.4-4). Although implementation of Mitigation Measure BIO-1, which required Ventura County to include a program in the 2040 General Plan to update the ISAG Biological Assessment report criteria to evaluate discretionary development that could potentially impact sensitive biological resources, would lessen potential impacts, the wide variety of future project types, site conditions, and other circumstances associated with future development may have project-specific instances where Mitigation Measure BIO-1 would not reduce impacts. The 2040 General Plan concluded that there were no additional actions or policies that the 2040 General Plan could feasibly mandate to reduce impacts to a less than significant level; this impact was concluded to be significant and unavoidable.

The project site is located on land zoned for agriculture and has been previously disturbed by farming and ranching activities. The project site and survey areas are not located within a habitat connectivity and wildlife corridor as identified by the Ventura County Planning Division. Field surveys did not identify any significant wildlife movement features or native wildlife nursery sites within the development footprint. While the surrounding agricultural and open space areas may attract wildlife, the proposed development is not expected to interfere with regional wildlife movement. The proposed conservation easement would permanently protect 63-acres of relatively undisturbed habitat, providing potential benefits to wildlife movement through the site. The project may include fencing along the boundaries of the proposed residential development to separate the development from adjacent properties; however, the fencing would not isolate wildlife habitat and is not expected to cause impacts to habitat connectivity and wildlife passage. Therefore, the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. As such, this impact would be less than significant.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact related to the interference with resident or migratory wildlife movement corridors or native nursery sites; however, the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create

new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not conflict with local policies or ordinances protecting biological resources (Impact 4.4-5). Ventura County contains several plans and regulations, such as the Ventura County Oak Woodland Management Plan, Ventura County Non-Coastal Zoning Ordinance, and Coastal Zoning Ordinance Tree Protection Regulations that would require projects to abide by the restrictions contained therein and implement mitigation to reduce potential impacts on native tree species. The 2040 General Plan EIR noted that other sections of the EIR include an analysis of local ordinances concerning lighting, noise, and water quality that may have an indirect effect on biological resources.

The project would be required to comply with all applicable local policies and ordinances that protect biological resources, including protected trees. Site visits were conducted as part of the ISBA and Arborist Report preparation in May 2024, June 2024, and July 2024, along with focused surveys, and did not identify any biological resources within the proposed development footprint that are protected by local policies and ordinances, except for trees protected by Ventura County's Tree Protection Regulations. The project would require the removal of seven protected heritage trees, as detailed in Table 2. The project would be required to comply with the County's Tree Protection Regulations set forth in Section 8107-25 et seq. of the NCZO and the Tree Protection Guidelines, and with the Oak Woodland Conservation Act (OWCA) (PRC Section 21083.4) (Condition of Approval Nos. C-14 and C-15). Consistent with these requirements and the recommendations of the ISBA, the project would implement Mitigation Measure BIO-3 to address the removal of heritage trees.

Additionally, the project would comply with 2040 General Plan Policy HAZ-9.2 and implement noise control measures during construction activities (Condition of Approval No. C-11) to minimize potential disturbance to nearby sensitive species. In accordance with Section 8106-8.6 of the Ventura County NCZO, the project would also incorporate lighting and glare reduction features (Condition of Approval No. C-7) to avoid adverse effects on surrounding habitat. Therefore, the project would not conflict with any local policies or ordinances protecting biological resources, including tree preservation regulations, and the impact would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to a conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and the project would not result in a significant impact on this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

The 2040 General Plan EIR concluded that no habitat conservation plans or natural community conservation plans have been adopted within the plan area of the 2040 General Plan. Therefore, no impact would occur, and this issue was not discussed further. No habitat conservation plans or natural community conservation plans have been adopted within the vicinity of the project site. As a result,

the project would not result in new significant impacts or substantially more severe impacts than were identified in the 2040 General Plan EIR.

## **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

Consistent with General Plan EIR Mitigation Measure BIO-1, an ISBA was prepared for the project that identified the following mitigation measures from the 2040 General Plan EIR that are project-specific for the protection of biological resources (Appendix D):

<b>MM BIO-1</b>	<b>Nest Avoidance</b>
<b>Purpose</b>	Avoidance of impacts to nesting migratory birds protected under the Migratory Bird Treaty Act
<b>Description</b>	Removal of vegetation shall be conducted between August 16 and February 28th or 29th, during the fall and winter, after fledging and before the initiation of breeding activities.
<b>Implementation Responsibility</b>	Planning Division
<b>Documentation</b>	The proposed schedule for vegetation clearing shall be documented.
<b>Timing</b>	Prior to the issuance of a zoning clearance for construction, the applicant shall submit the schedule for vegetation clearing activities to the Planning Division for review and approval. If vegetation clearing is planned outside of the window specified in this measure, Mitigation Measure BIO-2 shall apply.
<b>Monitoring and Reporting</b>	Prior to the issuance of a zoning clearance for construction of Phases 2 and 3, the Planning Division will review the proposed schedule for vegetation clearing for compliance with this measure.

<b>MM BIO-2</b>	<b>Breeding Bird Surveys</b>
<b>Purpose</b>	To minimize impacts to birds protected under the Migratory Bird Treaty Act
<b>Description</b>	If vegetation removal and/or heavy equipment usage must be conducted during the breeding bird nesting period (generally defined as March 1 through August 15), pre-construction breeding bird surveys shall be performed within vegetation removal and construction areas and within 300 feet of these areas to determine the location of bird nesting sites. If active nests are detected during the breeding season, nests shall be avoided during construction.
<b>Implementation Responsibility</b>	Planning Division
<b>Documentation</b>	The applicant shall provide to the Planning Division a Survey Report from a County-approved biologist documenting the results of the initial nesting bird survey and a plan for continued surveys and avoidance of nests in accordance with the requirements set forth in this measure. Along with the Survey Report, the applicant shall provide a copy of a signed contract (financial information redacted) with a County-approved biologist responsible for the surveys, monitoring of any occupied nests discovered, and establishment of mandatory setback areas. The applicant shall submit to the Planning Division a Mitigation Monitoring Report from a County-approved biologist following land clearing activities documenting actions taken to avoid nesting birds and results.
<b>Timing</b>	If land clearing or construction activities occur between March 1 through August 15, the County-approved biologist shall conduct the nesting bird surveys 30 days prior to initiation of land clearing or construction activities, and weekly thereafter. The last survey for nesting birds shall be conducted no more than 3 days prior to initiation of land clearing or construction activities. The applicant shall submit the Survey Report documenting the results of the first nesting bird survey and the signed contract to the Planning Division prior to issuance of a zoning clearance for construction. The applicant shall submit the Mitigation Monitoring Report within 14 days of completion of the land clearing or construction activities.

MM BIO-2	Breeding Bird Surveys
Monitoring and Reporting	The Planning Division reviews the Survey Report and signed contract for adequacy prior to issuance of a Zoning Clearance for construction. The Planning Division maintains copies of the signed contract, Survey Report, and Mitigation Monitoring Report in the Project file.
MM BIO-3	Protected Tree Protection and Replacement
Purpose	To comply with the County's Tree Protection Regulations (TPR) set forth in Section 8107-25 et seq. of the NCZO and the Tree Protection Guidelines (TPG).
Description	A tree protection plan shall be developed, approved and implemented according to the County's Content Requirements for Tree Protection Plans to protect trees during project construction. The Ventura County Tree Protection Guidelines require replacement of removed trees on a cross-sectional basis. Replacement trees shall be planted in compliance with the Tree Protection Guidelines as landscaping within the proposed development and on adjacent portions of Parcel 2 not supporting native vegetation. Tree species to be planted shall not be considered invasive by the California Invasive Plant Council. The tree protection plan and a tree planting and maintenance plan shall be submitted at least 60 days prior to the start of clearing and grubbing within the approved grading limits.
Implementation Responsibility	Planning Division
Documentation	<p>The applicant shall prepare and submit to the Planning Division for review and approval, a TPP pursuant to the "Content Requirement for Tree Protection Plans" that is currently available online at: <a href="http://www.ventura.org/rma/planning/pdf/permits/tree/Tree-Protection-Plan-11-11-19.pdf">http://www.ventura.org/rma/planning/pdf/permits/tree/Tree-Protection-Plan-11-11-19.pdf</a>. The TPP must include (but is not limited to):</p> <p>Measures to protect all TPR-protected trees whose tree protection zones (TPZs) are within 50 feet of the construction envelope (including stockpile and storage areas, access roads, and all areas to be used for construction activities) or within 10 feet of other trees proposed for felling or removal;</p> <p>The offset or mitigation that will be provided for any trees approved for felling; and</p> <p>The offset or mitigation that will be provided should any protected trees be damaged unexpectedly.</p> <p>A qualified arborist<sup>11</sup> shall prepare the TPP in conformance with the County's TPR, TPG, and "Content Requirements for Tree Protection Plans."</p> <p>If in-lieu fees will be paid to a conservation agency for tree offsets/mitigation, the applicant shall submit to the Planning Division for review and approval, a tree mitigation plan from a conservation agency that explains how the mitigation funds will be used to support the preservation of protected trees. After the Planning Division's review and approval of the tree mitigation plan, the applicant shall provide the Planning Division with a copy of the contract between the conservation agency and the applicant.</p> <p>If a financial assurance is required for tree offsets/mitigation, the Planning Division shall provide the applicant with a "Financial Assurance Acknowledgement" form. The applicant shall submit the required financial assurance and the completed "Financial Assurance Acknowledgement" form to the Planning Division. The applicant shall submit annual verification that any non-cash financial assurances are current and have not expired.</p>

<sup>11</sup> A qualified arborist may be either an International Society of Arboriculture certified arborist or a related professional, such as a landscape architect, with qualifying education, knowledge and experience, as determined by the Planning Director. The project arborist is the arborist who prepared the TPP and remains involved with implementation and monitoring of the Project.

MM BIO-3	Protected Tree Protection and Replacement
Timing	<p>Prior to the issuance of a zoning clearance for construction, the applicant shall submit the TPP to the Planning Division for review and approval, implement all prior-to-construction tree protection measures, and submit the required documentation to demonstrate that the applicant implemented the tree protection measures. Unless otherwise approved by the Planning Director, replacement and transplant trees must be planted prior to occupancy. Other monitoring and reporting dates shall be as indicated in the approved TPP.</p> <p>If in lieu fees are required and will be paid to the Planning Division's Tree Impact Fund, the applicant shall submit these fees prior to the issuance of a zoning clearance for construction. Where a TPP damaged tree addendum is prepared, the applicant shall remit payment of the fees within 30 days of Planning Division's approval of the addendum.</p> <p>If in lieu fees are required and will be paid to an approved conservation agency, the applicant shall submit these fees, along with the required tree mitigation plan and contract from the conservation organization, prior to the issuance of a zoning clearance for construction.</p> <p>If a financial assurance is required, the applicant shall submit the required financial assurance and the completed "Financial Assurance Acknowledgement" form prior to the issuance of a zoning clearance for construction. The Planning Division may release the financial assurance after receiving the report from the project arborist that verifies that the replacement trees met their final 5- or 7-year performance targets set forth in the TPP.</p>
Monitoring and Reporting	<p>The applicant shall retain an arborist to monitor and prepare the documentation regarding the health of the protected trees, pursuant to the monitoring and reporting requirements set forth in the "Content Requirements for Tree Protection Plans." The Planning Division maintains the approved TPP and all supporting documentation in the Project file. The Resource Management Agency Operations Division maintains copies of all financial documentation. Planning Division staff, Building and Safety Inspectors, and Public Works Agency grading inspectors have the authority to inspect the site during the construction phase of the Project, in order to verify that tree protection measures remain in place during construction activities, consistent with the requirements of Section 8114-3 of the NCZO.</p>

In addition, the following uniformly applied development policies or standards would be incorporated into the project:

- NCZO Section 8107-25 et seq
- NCZO Section 8106-8.6
- Tree Protection Regulations
- PRC Section 21083.4
- Fish and Game Code Section 1361
- Migratory Bird Treaty Act
- **2040 General Plan Policy HAZ-9.2: Noise Compatibility Standards.** The County shall review discretionary development for noise compatibility with surrounding uses. The County shall determine noise based on the following standards:
  1. New noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed CNEL 60 or Leq1H of 65 dB(A) during any hour.
  2. New noise sensitive uses proposed to be located near railroads shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed L10 of 60 dB(A)

3. New noise sensitive uses proposed to be located near airports:
  - i. Shall be prohibited if they are in a Community Noise Equivalent Level (CNEL) 65 dB or greater, noise contour; or
  - ii. Shall be permitted in the Community Noise Equivalent Level (CNEL) 60 dB to CNEL 65 dB noise contour area only if means will be taken to ensure interior noise levels of CNEL 45 dB or less.
4. New noise generators, proposed to be located near any noise sensitive use, shall incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor, measured at the exterior wall of the building, does not exceed any of the following standards:
  - i. Leq1H of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.;
  - ii. Leq1H of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.; and
  - iii. Leq1H of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m.
5. Construction noise and vibration shall be evaluated and, if necessary, mitigated in accordance with the Construction Noise Threshold Criteria and Control Plan (Advanced Engineering Acoustics, November 2005).

### **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

#### **Condition of Approval Number C-7: Landscaping and Screening**

The Permittee shall retain a landscape architect to prepare a landscape plan that complies with the requirements of this condition and the California Department of Water Resources Model Water Efficient Landscape Ordinance (MWELO).

#### **Condition of Approval Number C-14: Tree Protection Plan (TPP)**

The Permittee shall avoid impacting protected trees to the extent feasible and shall offset or mitigate any damage to protected trees or associated impacts from such damage. If protected trees are felled/damaged and require offsets/mitigation pursuant to the Tree Protection Regulations (Section 8107-25.10) and Tree Protection Guidelines (Section IV.C, Offset/Replacement Guidelines), the Permittee shall post a financial assurance to cover the costs of planting and maintaining the offset trees. The Permittee shall prepare and submit to the Planning Division for review and approval; a Tree Protection Plan pursuant to the County's "Content Requirement for Tree Protection Plans".

#### **Condition of Approval Number C-15: Tree Health Monitoring and Reporting**

The Permittee shall submit annual monitoring reports, prepared by an arborist, after initiation of construction activities and until two years after the completion of construction activities, which address the success of tree protection measures and the overall condition of encroached-upon trees relative to their condition prior to the initiation of construction activities. If any trees are found to be in serious decline (e.g., "D" status, or "C" status if pre-construction status was "A"), the arborist's



report must include a Damaged Tree Addendum to the TPP which recommends offsets and any associated additional monitoring.

**Condition of Approval Number A-11: Avoidance of Nesting Birds**

The Permittee shall conduct all demolition, tree removal/trimming, vegetation clearing, and grading activities (collectively, "land clearing activities"), and construction in such a way as to avoid nesting native birds.

## 5 Cultural Resources

### Summary of Findings

With regard to Cultural Resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. Mitigation measures identified in the 2040 General Plan EIR would be applicable.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts to cultural resources.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>5. Cultural Resources</b>						
Would the project:						
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	GP EIR pp.4.5-16 to 4.5-21 Impact 4.5-2	No	No	No	No	N/A
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	GPEIR pp.4.5-12 to 4.5-16 Impact 4.5-1	No	No	No	No	Yes
c. Disturb any human remains, including those interred outside of formal cemeteries?	GPEIR p.4.5-6 Impact: was dismissed	No	No	No	No	Yes

## Discussion

- a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in the potential loss of historical resources because it may not be feasible to design all future development that could occur under the 2040 General Plan such that it avoids alteration or demolition of significant historical resources (Impact 4.5-2). Impacts would be reduced through the implementation of Mitigation Measures: CUL-1a, 1b, and 1c would require that discretionary development projects protect existing resources, avoid potential impacts to the maximum extent feasible; and Mitigation Measure CUL-2 would require the identification of listed, eligible, or unevaluated sites in coordination with the Cultural Heritage Board. Further, policy modifications provide the opportunity for the Cultural Heritage Board to offer project-level recommendations and guidance to ensure that efforts are made to avoid, preserve, or otherwise mitigate impacts to historic resources. Mitigation Measure CUL-3 provides on-site preservation guidance, and in the event that a structure or resource cannot be preserved, it ensures that actions would be taken to record, evaluate, avoid, or otherwise treat a listed, eligible, or previously unevaluated historic resource appropriately, in accordance with pertinent laws and regulations. However, these mitigation measures would not prevent the loss of historical resources. In addition, the 2040 General Plan EIR concluded there were no actions or policies that Ventura County could feasibly mandate to fully replace the loss of historical resources; this impact was identified as significant and unavoidable.

2040 General Plan Policy COS-4.4 was established in response to General Plan EIR Mitigation Measure CUL-1a, which requires that all discretionary development projects be assessed for potential tribal, cultural, historical, paleontological, and archaeological resources by a qualified professional and shall be designed to protect existing resources. Additionally, Implementation Programs COS-HH and COS-II were established in response to General Plan EIR Mitigation Measures CUL-1b and CUL-1c, respectively, which require a records search and Sacred Lands File search with the South Central Coastal Information Center for discretionary projects, and procedures for the protection and avoidance of cultural resources.

A Historical Resources Assessment was prepared by Rincon in April 2025 to assess the buildings on the project site for their potential to be considered historical resources pursuant to CEQA (Appendix E). The project site currently contains a Ranch-style residence, garage, shed, barn, and a shipping container. Although the property has agricultural roots dating back to the early 20th century, all existing structures were built between 1959 and 2023. After thorough archival research and a field survey, the buildings were found to lack historical significance under federal, state, and local criteria. It is not associated with significant historical events, persons, or architectural distinction, and therefore does not qualify as a historical resource under CEQA. As such, the project would result in no impact to historical resources.

As previously discussed, the 2040 General Plan EIR identified that projects within the county may have significant and unavoidable impacts related to a substantial adverse change in the significance of a historical resource. The project would have no impact to historical resources, as none are present on the project site. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in the potential loss of archaeological resources because ground-disturbing activities associated with project-level construction activities could damage or destroy previously undiscovered archaeological features or sites, thereby resulting in a substantial change in the significance of an archaeological resource (Impact 4.5-1). The 2040 General Plan EIR identified that impacts would be reduced with the implementation of Mitigation Measures: CUL-1a, 1b, and 1c, which would require that discretionary development projects protect existing resources and avoid potential impacts to the maximum extent feasible. However, these mitigation measures would not prevent the loss of archaeological resources. Further, it is still possible that future development resulting from the 2040 General Plan could uncover previously unknown archaeological resources during project-level construction activities, the discovery of which may result in damage, destruction, or changes in significance, of archaeological resources. Therefore, the full protection of archaeological resources cannot be guaranteed at the program level of analysis. In addition, the 2040 General Plan EIR concluded there were no actions or policies that Ventura County could feasibly mandate to fully replace the loss of archaeological resources; this impact was identified as significant and unavoidable.

A Phase I Cultural Resources Assessment (CRA) was completed for the project by Envicom in May 2025 (Appendix F). The Phase I CRA found no previously recorded cultural resources within the project site, though the surrounding region is considered sensitive for prehistoric and historic resources. The Phase I CRA recommended that archaeological and Native American monitoring be conducted during ground-disturbing activities to ensure protection of any potentially significant subsurface cultural materials. The project would be required to implement Condition of Approval No. A-13, which specifies the project must comply with 2040 General Plan Policy COS-4.4 and Implementation Programs COS-HH and COS-II to avoid potential impacts to previously undiscovered archaeological resources. In accordance with Condition of Approval No. A-13, the project would implement the recommended measures provided in the Phase I CRA, which include Mitigation Measures CUL-1 through CUL-3. These measures require archaeological and Native American monitoring during construction activities, as well as resource recovery protocol for archaeological, tribal, and fossil resources discovered during construction. Project impacts would be less than significant with implementation of mitigation.

As previously discussed, the 2040 General Plan EIR identified that projects within the county may have significant and unavoidable impacts related to the potential loss of archaeological resources due to ground-disturbing activities. The project would implement mitigation measures, including archaeological and Native American monitoring, in accordance with the Phase I CRA and Ventura County requirements. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*c. Disturb any human remains, including those interred outside of formal cemeteries?*

The 2040 General Plan EIR concluded that California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code Sections 7050.5 and 7052 and California PRC Section 5097. Future development that could occur during the planning horizon of the 2040

General Plan would be required to comply with the California Health and Safety Code and the California PRC. Therefore, no impact would occur from buildout of the 2040 General Plan EIR, and this issue was not discussed further.

While the project would not affect any known human remains, ground disturbing construction activities could result in the discovery of previously unknown human remains. However, California Health and Safety Code Section 7050.5, CEQA Guidelines Section 15064.5, and California Public Resources Code Section 5097.98 mandate the process to be followed in the event of accidental discovery of human remains in a location other than a dedicated cemetery. These regulations also provide guidance if the remains are determined to be Native American. Project compliance with these regulations would ensure there would be no impact to human remains. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

In accordance with Mitigation Measure CUL-1c of the 2040 General Plan EIR, the following project-specific mitigation measures would be implemented to protect cultural resources:

**Mitigation Measure CUL-1: Archaeological Monitoring.** An archaeological monitor that meets the Secretary of Interior qualifications shall be on site during grading of the project site from surface to bedrock and during utility excavation. The purpose of having an archaeologist on site is to assess if any significant cultural resources are encountered during grading. Archaeological monitoring shall start with full-time monitoring, however, if the monitoring team determines that native soils have been disturbed, removed, or heavily impacted during previous earth moving activities on the site, then monitoring can be reduced to spot-check or contingency monitoring only.

The archaeological monitor shall collect any diagnostic prehistoric or older historical material uncovered through project excavation and can halt construction within 30-feet of a potentially significant cultural resource if necessary. Artifacts collected from a disturbed context or that do not warrant additional assessment can be collected without the need to halt grading. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the monitor's daily monitoring log. However, if prehistoric features or older historical features are encountered, the project "discovery" protocol should be followed (see below).

A final Archaeological Monitoring Report shall be produced that discusses all monitoring activities and all artifacts recovered and features identified through monitoring of the project site. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the final Monitoring Report. All artifacts recovered that are determined to have historical information value, with diagnostic or location information that may be important to California history, shall be cleaned, analyzed, and described within the Monitoring Report. All materials determined important shall be curated at an appropriate depository or returned to the landowner for public display if possible. Prehistoric artifacts may be relocated by the tribal monitor if agreed upon by the Lead Agency. If important artifacts are found during monitoring, a Curation Plan may be needed that is reviewed by the Lead Agency prior to the publication of the Monitoring Report. The costs of the Monitoring Report, the Curation Plan, and the processing, analysis, and curation of all artifacts shall be the responsibility of the applicant.

**Mitigation Measure CUL-2: Native American Monitoring.** The project applicant shall retain a professional Native American Tribal monitor who has a cultural affiliation to the project region to observe all ground disturbing activities of intact or potentially intact native soils. Ground disturbing activities include, but are not limited to, site clearing and grubbing, grading, excavation, and trenching. Monitoring shall take place for the duration of such activities until older alluvial deposits or bedrock are encountered, which are pre-Holocene geological contexts that do not have prehistoric Native American cultural resources. Fill deposits shall also not require Native American monitoring unless the fill material can be determined to be originally from the project site.

The tribal monitor can collect any diagnostic prehistoric or ethnographic material uncovered through project excavation and can halt construction within 30 feet of a potentially significant cultural resource, if necessary, in order to better examine project soils. Artifacts recovered shall be processed by the archaeological monitor as part of the larger monitoring program but can be returned to the tribal monitor at the end of the project if agreed upon by the Lead Agency. Artifacts found within a disturbed context or that do not warrant additional assessment can be collected without the need to halt grading and can be transferred to the site archaeological monitoring for further analysis and processing. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the tribal monitor's daily monitoring log. However, if prehistoric features or artifact concentrations are encountered, the project "discovery" protocol should be followed (see below). The tribal monitor daily forms shall be included with any final project Monitoring Report.

**Mitigation Measure CUL-3: Archaeological, Tribal, and Fossil Resource Discovery Protocol.** If potentially significant intact archaeological, Tribal, or fossil deposits are encountered within an undisturbed context, or in contexts that do not readily allow for expedient site removal, then a cultural resource "discovery" protocol shall be followed. If older historical or prehistoric features, artifact concentrations, prehistoric material, or sensitive fossil material, is encountered during project grading and subsurface excavation within native soils or original context, then all work in that area shall be halted or diverted away from the discovery to a distance of 30-feet until a qualified senior archaeologist, Native American monitor or their supervisor, or paleontologist can evaluate the nature and/or significance of the find(s). If a senior archaeologist, Native American monitor or their supervisor, or a senior paleontologist confirms that the discovery is potentially significant, then the Lead/Permitting Agency shall be contacted and informed of the discovery immediately.

Construction shall not resume in the locality of the discovery until consultation between the senior archaeologist, Native American monitor or their supervisor, paleontologist, the owner's representative, the Lead/Permitting Agency, and any other concerned parties (such as other Native American Tribal Groups), takes place and reaches a conclusion approved by the Lead/Permitting Agency. If a significant archaeological, TCR, or fossil resource is discovered during earth-moving, complete avoidance of the find is preferred. However, if the discovery cannot be avoided, further survey work, evaluation tasks, or data recovery of the significant resource may be required by the Lead/Permitting Agency. All individual reports shall be submitted to the SCCIC, the Native American monitoring organization, or to the Natural History Museum of Los Angeles County at the conclusion of the project. Curation agreements may also need to be made with appropriate depositories.

In addition, the following uniformly applied development policies or standards would be incorporated into the project:

- Health and Safety Code Section 7050.5
- CEQA Guidelines Section 15064.5
- California Public Resources Code Section 5097.98

- **2040 General Plan Policy COS-4.2(b): Cooperation for Tribal Cultural Resource Preservation:** For discretionary projects, the County shall request local tribes contact information from Native American Heritage Commission, to identify known tribal cultural resources. If requested by one or more of the identified local tribes, the County shall engage in consultation with each local tribe to preserve, and determine appropriate handling of, identified resources within the county.
- **2040 General Plan Policy COS-4.4: Discretionary Development and Tribal, Cultural, Historical, Paleontological, and Archaeological Resource Preservation:** The County shall require that all discretionary development projects be assessed for potential tribal, cultural, historical, paleontological, and archaeological resources by a qualified professional and shall be designed to protect existing resources. Whenever possible, significant impacts shall be reduced to a less-than-significant level through the application of mitigation and/or extraction of maximum recoverable data. Priority shall be given to measures that avoid resources.
- **2040 General Plan 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.
- **2040 General Plan Program COS-II: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures:** For discretionary projects, the County shall require the following:
  - i. Projects shall be designed to protect existing resources and shall avoid potential impacts to the maximum extent feasible
  - ii. 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.
  - iii. If any materials or artifacts are discovered during ground disturbance and/or construction activities, construction shall halt until a qualified archaeologist, paleontologist, or Native American monitor can access the discovery. A report or memorandum shall be prepared by the qualified monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources. Recommendations or mitigation identified by the qualified monitor shall be implemented prior to commencing or continuing project activities and/or construction.

## **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval to further minimize impacts:

### **Condition of Approval Number A-12: Archaeological Monitoring**

The Permittee shall retain archaeological and Native American monitors to monitor all subsurface grading, trenching, or construction activities on the project site

### **Condition of Approval Number A-13: Archaeological Resources Discovered During Grading**

The Permittee shall implement the following procedures:

- a. If any archaeological or historical artifacts are uncovered during ground disturbance or construction activities, the Permittee shall:
  - (1) Cease operations and assure the preservation of the area in which the discovery was made;
  - (2) Notify the Planning Director in writing, within three days of the discovery;



- (3) Obtain the services of a County-approved archaeologist who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
  - (4) Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development; and
  - (5) Implement the agreed upon recommendations.
- b. If any human burial remains are encountered during ground disturbance or construction activities, the Permittee shall:
- (1) Cease operations and assure the preservation of the area in which the discovery was made;
  - (2) Immediately notify the County Coroner and the Planning Director;
  - (3) Obtain the services of a County-approved archaeologist and, if necessary, Native American Monitor(s), who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
  - (4) Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development on-site; and
  - (5) Implement the agreed upon recommendations.

## 6 Energy

### Summary of Findings

With regard to energy, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. No mitigation measures were included within the 2040 General Plan EIR, and none would be required because project specific impacts would be less than significant.
5. No uniformly applied development policies or standards would be required to mitigate impacts related to energy and no conditions of approval or impact minimization measures would be incorporated to further reduce impacts related to energy.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>6. Energy</b>						
Would the project:						
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	GPEIR pp. 4.6-18 to 4.6-22 Impact 4.6-1	No	No	No	No	N/A
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	GPEIR pp. 4.6-18 to 4.6-22 Impact 4.6-1	No	No	No	No	N/A

### Discussion

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

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project

construction or operation and would not conflict with or obstruct state or local plans for renewable energy or energy efficiency (Impact 4.6-1). The 2040 General Plan includes policies and programs that encourage future sustainable building practices that promote efficient energy consumption associated with construction activities, decrease reliance on fossil fuels by supporting the electrification of vehicles by deploying charging infrastructure, promote building electrification, and encourage alternative modes of transportation. The analysis also describes that deploying additional renewable energy generation sources at the distributed and utility-scale would increase reliance on renewable sources of electricity in Ventura County and that the 2040 General Plan policies and programs support the goals of State and local energy plans. The 2040 General Plan EIR therefore concluded that the 2040 General Plan would result in a less than significant impact related to the wasteful, inefficient, or unnecessary consumption of energy and would not conflict with or obstruct State and local plans for energy efficiency or renewable energy.

During the construction phase of the project the use of heavy-duty construction equipment, transportation and use of construction materials, and worker commutes would all require energy. The short-term energy expenditure required to construct the project would be nonrecoverable. The energy needs for project construction would be primarily met through petroleum fuels for transportation and equipment operation and would not require additional capacity or increase peak-or base-period demands for electricity. In addition, construction related fuel consumption would ultimately support the development of a 100 percent electric affordable housing community, consistent with state climate goals. Implementation of the project would align with the goals of the 2022 CARB Scoping Plan to increase renewable energy use and decrease fossil fuel consumption. The project would be fully electric, with no natural gas infrastructure, and would include solar panels and electric vehicle charging stations, supporting the transition to clean energy in both the building and transportation sectors. Electricity would be supplied by Southern California Edison, which is required under Senate Bill 100 and Senate Bill 1020 to transition to 100 percent zero-carbon electricity by 2045. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and construction and operational energy impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR identified that implementation of the 2040 General Plan would result in less than significant impacts related to the wasteful, inefficient, or unnecessary consumption of energy. The project would be fully electric, include solar panels and EV charging stations, and align with state and local energy goals, including the 2022 CARB Scoping Plan and Senate Bill 1020. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

Mitigation measures were not identified in the 2040 General Plan EIR to offset energy consumption. However, the following uniformly applied development policies or standards would be incorporated into the project:

- California Green Building Standards Code (CALGreen; Title 24, Part 11)
- California Building Energy Efficiency Standards (Title 24, Part 6)

### **Conditions of Approval and Impact Minimization Measures**

The project would not incorporate conditions of approval and impact minimization measures related to energy.

# 7 Geologic Hazards and Paleontological Resources

## Summary of Findings

With regard to Geologic Hazards, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. Mitigation measures contained within the 2040 General Plan EIR would be applicable.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts related to geologic hazards and paleontological resources.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
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### 7. Geologic Hazards and Paleontological Resources

Would the project:

- a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
- GPEIR pp.4.7-5 to 4.7-11  
Impact 4.7-1,  
Impact 4.7-2,  
Impact 4.7-3,  
Impact 4.7-4
- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or County of Ventura designated Fault Hazard Area?
- ii. Strong seismic ground shaking?
- iii. Seismic-related ground failure, including liquefaction?

No	No	No	No	Yes
No	No	No	No	Yes
No	No	No	No	Yes

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
iv. Landslides		No	No	No	No	Yes
b. Result in substantial soil erosion or the loss of topsoil?	GP EIR p.4.7-2 Impact: was dismissed	No	No	No	No	Yes
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	GPEIR p. 4.7-12 Impact 4.7-6	No	No	No	No	Yes
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	GPEIR pp.4.7-11 to 4.7-12 Impact 4.7-5	No	No	No	No	Yes
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	GPEIR pp. 4.10-22 to 4.10-23 Impact 4.10-17	No	No	No	No	N/A
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	GPEIR pp.4.5-24 to 4.5-26 Impact 4.5-4	No	No	No	No	Yes

## Discussion

- a. *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or County of Ventura designated Fault Hazard Area?*
  - ii. *Strong seismic ground shaking?*
  - iii. *Seismic-related ground failure, including liquefaction?*
  - iv. *Landslides*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not expose people or structures to fault rupture hazards, or directly or indirectly cause fault rupture (Impact 4.7-1). As described in the 2040 General Plan EIR, there are several earthquake faults in the County that are classified as active or potentially active.<sup>12</sup> The major faults and fault systems located in the county are the Malibu Coast Fault System, Oak Ridge Fault System, Pine Mountain Thrust Fault and Big Pine Fault, San Cayetano-Red Mountain-Santa Susana Fault System, Simi-Santa Rosa Fault System, and Ventura-Pitas Point Fault. The 2040 General Plan EIR concluded that several General Plan Policies, such as HAZ-4.1, HAZ-4.2, HAZ-4.3, HAZ-4.8, and HAZ-4.17, would substantially lessen the adverse effects from future development within active fault areas. Adherence to existing regulations would additionally safeguard future development under the 2040 General Plan and would require that development is sited away from State of California-Earthquake Fault Zone designated by the Alquist-Priolo Earthquake Fault Zoning Act or County-Designated Fault Hazard Areas. Therefore, impacts related to exposing people or structures to fault rupture hazards or directly or indirectly causing fault rupture were concluded to be less than significant.

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not expose people or structures to ground-shaking hazards (Impact 4.7-2). The 2040 General Plan EIR concluded that several 2040 General Plan Policies, such as HAZ-4.3 and HAZ-4.8, would substantially lessen the adverse effects from ground-shaking hazards. Adherence to existing regulations would require that development is sited away from State of California-Earthquake Fault Zone designated by the Alquist-Priolo Earthquake Fault Zoning Act or County Designated Fault Hazard Areas to further reduce impacts. Therefore, impacts related to the risk of loss, injury, or death involving ground-shaking hazards were concluded to be less than significant.

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not expose people or structures to liquefaction hazards or directly or indirectly cause the risk of loss, injury, or death involving liquefaction (Impact 4.7-3). Areas with liquefaction potential have been identified throughout Ventura County. The 2040 General Plan EIR identified that future development would be subject to building permit review procedures and construction standards and be required to comply with the Ventura County Building Code, which includes the California Building Code (CBC). Measures such as soil improvement methods or removal or densification of liquefiable soils would be required for the design of individual future projects to reduce potential hazards from liquefaction. The 2040 General Plan EIR concluded that several 2040 General Plan Policies, such as HAZ-4.8, would substantially lessen the adverse effects from liquefaction by restricting development in liquefaction areas unless a geotechnical investigation is performed, and appropriate and sufficient safeguards are incorporated. Therefore, the 2040 General Plan EIR concluded the impact to be less than significant.

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not expose people or structures to landslide hazards (Impact 4.7-4). A large portion of the County is located in a Very High Landside Susceptibility area. Several 2040 General Plan policies were identified to lessen the potential for impacts from landslide hazards such as HAZ-4.9, HAZ-4.10, and HAZ-4.11. These 2040 General Plan Policies direct development away from areas prone to landslides, require geotechnical reports that demonstrate adequate slope stability and construction methods for building and road construction on slopes greater than 50 percent, and restrict the alteration of land in landslide/debris flow hazard areas. The 2040 General Plan EIR concluded compliance with the 2040 General Plan Policies, Ventura County Building Code, CBC, and the California Geological Survey Special Publication

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<sup>12</sup> Ventura County. 2020. Ventura County 2040 General Plan Environmental Impact Report. Available: [ventura-county-2040-general-plan-final-environmental-impact-report.pdf](#). Accessed October 2025.



117A would substantially lessen impacts by requiring future development to be designed to minimize potential risks. Impacts were concluded to be less than significant.

The project site is located in a seismically active region of Southern California. According to the Geological and Geotechnical Engineering Study prepared by Advanced Geotechnical Services, Inc. in August 2023, the project site is neither located on nor adjacent to a known fault line or designated earthquake fault hazard zone (Appendix G). The nearest fault is the Red Mountain Fault Zone, located approximately 0.8 miles northwest of the project site, and the nearest Alquist-Priolo Earthquake Fault Zone is located approximately 3.5 miles to the south. The project site is in an area not designated by Ventura County as a Liquefaction Hazard Zone.<sup>13</sup> However, the eastern portion of the site, located within the designated conservation area, has been identified as being underlain by landslide debris and is subject to potential landslide risk (Appendix G). This was documented in the Geological and Geotechnical Engineering Study, which mapped landslide deposits (QIs) in that area and recommended appropriate setbacks and engineering measures to minimize risks related to slope instability. In accordance with the Ventura County Building Code (adopted from the 2022 California Building Code, Chapter 16, Section 1613), all structures would be designed to withstand seismic ground shaking (Condition of Approval No. C-47). In addition, compliance with the engineering recommendations provided in the Geological and Geotechnical Engineering Study would further reduce the potential for seismic-related impacts. Therefore, the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving fault rupture, strong seismic groundshaking, seismic-related ground failure, or landslides. Impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR identified a less than significant impact related to seismic hazards, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*b. Result in substantial soil erosion or the loss of topsoil?*

The 2040 General Plan EIR identified that impacts related to soil erosion and the loss of topsoil are not addressed in the ISAGs. General Plan Policy HAZ-4.6, which requires discretionary development to minimize the removal of vegetation to protect against soil erosion, debris flows, and landslides would reduce soil erosion. Therefore, no impact would occur, and this issue was not discussed further.

Project construction would involve grading and site preparation and has the potential to result in soil erosion or the loss of topsoil. The project would comply with applicable County of Ventura policies, including 2040 General Plan Policy HAZ-4.6, which requires minimizing vegetation removal to reduce risks of soil erosion, rockslides, and landslides, and Condition of Approval Nos. A-19 and A-20, which require compliance with the National Pollutant Discharge Elimination System (NPDES) construction requirements. Coverage under the Construction General Permit is required for projects resulting in greater than one acre of disturbance area, and construction activities under the project would be subject to the Construction General Permit requirements. The Construction General Permit requires implementation of a stormwater pollution prevention plan that outlines project-specific BMPs to control erosion. Such BMPs include the use of temporary de-silting basins and installation of silt

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Ventura County. 2025. County View GIS Map. Available:  
[https://maps.ventura.org/Html5Viewer/index.html?viewer=CountyView.CountyView\\_gvh](https://maps.ventura.org/Html5Viewer/index.html?viewer=CountyView.CountyView_gvh). Accessed October 2025.

fences and erosion control blankets. Compliance with these requirements would ensure that construction would not result in substantial erosion or loss of topsoil.

During operation, the site would be developed with permanent housing structures and community amenities, significantly reducing the amount of exposed soil and reducing the potential for erosion. Furthermore, in accordance with Condition of Approval No. C-20, a drainage plan would be implemented that includes stormwater management BMPs to ensure that stormwater is properly managed on the site and does not result in substantial erosion. Therefore, project operation would result in less than significant impacts related to erosion.

As previously discussed, the 2040 General Plan EIR identified that implementation of the 2040 General Plan would result in no impact related to soil erosion or the loss of topsoil, as future development would be required to comply with applicable policies and permits. The project would implement erosion control measures during construction and stormwater management BMPs during operation, consistent with 2040 General Plan Policy HAZ-4.6 and applicable permit requirements. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- c. *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not result in the risk of loss, injury, or death associated with future development located within a subsidence hazard zone, and safeguard future development from direct or indirect cause subsidence (Impact 4.7-6). Future development would be required to comply with standards of the Ventura County Building Code and the CBC. General Plan Policy HAZ-4.15 requires potential ground surface subsidence to be evaluated for new oil, gas, water or other extraction well drilling permits and that appropriate and sufficient safeguards are incorporated into project design. 2040 General Plan Policy HAZ-4.16 requires structural design to recognize the potential for subsidence and hydroconsolidation and provide mitigation recommendations. This impact was concluded to be less than significant.

Portions of the project site are underlain by geologic units that may present unstable soil conditions. Specifically, the eastern portion of the site, located within the conservation area, contains mapped landslide deposits (Qls), which are indicative of past slope instability and potential for future movement (Appendix G). Additionally, the Geological and Geotechnical Engineering Study identified areas of older alluvium (Qoa) and Pico Formation bedrock (Tp), which may exhibit variable engineering properties such as differential settlement or expansive behavior depending on moisture content and load conditions. The Geological and Geotechnical Engineering Study recommends site-specific engineering measures to address these conditions, including slope setbacks, proper grading, and foundation design tailored to the subsurface conditions encountered. Implementation of these recommendations would minimize risks associated with unstable soils, including settlement, slope failure, and ground movement. Furthermore, the project would be required to comply with 2040 General Plan Policy HAZ-4.16 to reduce potential impacts from subsidence hazards, as well as comply with the Ventura County Building Code and CBC (Condition of Approval No. C-47). Compliance with these policies and regulations would minimize adverse effects from subsidence and other unstable soil conditions, and the impact would be less than significant.

As previously discussed, the 2040 General Plan EIR identified a less than significant impact related to the risk of loss, injury, or death associated with future development located within a subsidence hazard zone, and the project would not result in a significant impact for this topic. The project would implement slope setbacks, proper grading, and foundation design tailored to project site conditions, in accordance with the recommendations of the Geological and Geotechnical Engineering Study and County requirements. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would minimize risks associated with expansive soils (Impact 4.7-5). Most of the county is located within zones of medium expansive soil potential, and areas with high expansive soil potential are scattered throughout the county. The 2040 General Plan EIR identified that future development could potentially be located on expansive soils and would be required to comply with the Ventura County Building Code, CBC, and State requirements, as well as General Plan Policy HAZ-4.13, which requires a geotechnical engineering investigation and incorporation of appropriate safeguards into the project design. If expansive soils have been identified at a project site, foundations of structures would be required to implement special design considerations in accordance with Section 1808.6 of the Ventura County Building Code. This impact was concluded to be less than significant.

The project site is in the Ventura foothills region, characterized by a mix of older alluvium (Qoa), landslide debris (Qls), and Pico Formation bedrock (Tp). Based on findings from the Geological and Geotechnical Engineering Study, soils on the project site are generally strong and slightly compressible and are considered to be within the low to medium expansion category (Appendix G). The project would be required to comply with and implement design standards and standard industry practices included in the Ventura County Building Code to address the site's low-to medium-expansive soils. Compliance with these regulations would minimize risks associated with expansive soils.

As previously discussed, the 2040 General Plan EIR identified a less than significant impact related to expansive soil, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would accommodate future development that could result in the need for onsite wastewater treatment systems (OWTS) (Impact 4.10-17). The County requires OWTS to be properly sited pursuant to the findings of a geotechnical report and to be designed in compliance with existing local regulations including Ventura County Building Code, Articles 1 and 6, Ventura County Sewer Policy, Ventura County Ordinance Code, Division 4, California Plumbing Code, the Environmental Health Division Onsite Wastewater Treatment System Technical Information Manual, and the California Regional

Water Quality Control Board Basin Plans. Through adherence with these regulations, the impact related to construction of OWTS was concluded to be less than significant.

The project would not include the installation of an OWTS, septic tanks, or alternative wastewater disposal systems. Therefore, the project would not result in an impact related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. As previously discussed, the 2040 General Plan EIR did not identify a significant impact related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in adverse effects to paleontological resources through project-level construction activities, such as earth-moving and ground disturbance. Specifically, grading and excavation of known fossiliferous rock would result in the loss of known or yet undiscovered paleontological resources. Further, unsecure areas could result in increased access to paleontologically sensitive areas and subsequently, the unauthorized collection of fossil materials. As a result, known and yet undiscovered resources could be lost and/or destroyed (Impact 4.5-4). The 2040 General Plan EIR identified that impacts would be reduced with implementation of Mitigation Measures: CUL-1a, CUL-1b, CUL-1c, CUL-4, CUL-5, and CUL-6 which would require that discretionary development projects protect existing resources and avoid potential impacts to the maximum extent feasible. However, protection of paleontological resources may not always be feasible, as it is possible that materials and sites could be accessed unlawfully or could not be entirely avoided during construction activity. Therefore, because the potential for permanent loss of a paleontological resource cannot be guaranteed, the 2040 General Plan EIR concluded this impact to be significant and unavoidable.

2040 General Plan Policy COS-4.4 was established in response to General Plan EIR Mitigation Measure CUL-1a, which requires that all discretionary development projects be assessed for potential tribal, cultural, historical, paleontological, and archaeological resources by a qualified professional and shall be designed to protect existing resources. Implementation Programs COS-HH and COS-II were established in response to General Plan EIR Mitigation Measures CUL-1b and CUL-1c, respectively, which require a records search and Sacred Lands File search with the South Central Coastal Information Center for discretionary projects, and procedures for the protection and avoidance of cultural resources. 2040 General Plan Policy COS-4.1 was established in response to General Plan EIR Mitigation Measure CUL-4, which requires that the County maintain an inventory of tribal, cultural, historical, paleontological, and archaeological resources. 2040 General Plan Policy COS-4.2 was established in response to General Plan EIR Mitigation Measure CUL-5, which requires Ventura County to cooperate with other jurisdictions and organizations to identify known cultural, archaeological, historical, and paleontological resources to preserve identified resources within the county and to engage in consultation with tribes to preserve and determine the appropriate handling of, identified resources within the county. Finally, 2040 General Plan Implementation Program COS-KK was developed in response to 2040 General Plan EIR Mitigation Measure CUL-6, which requires project security measures in areas where paleontologically rich sites or tribal cultural resources are known to be present.

The project site is primarily composed of older alluvium (Qoa), landslide debris (Qls), and Pico Formation bedrock (Tp), with surface soils heavily disturbed due to historical agricultural use. Approximately 6 to 10 feet of loam soil and field tile drainage features overlay the native terrain. While the Pico Formation may have some paleontological sensitivity, the disturbed nature of the site and the presence of fill material significantly reduce the potential for intact fossil resources (Appendix F). Compliance with 2040 General Plan Implementation Program COS-II would minimize the potential for impacts to paleontological resources in the event any are uncovered during ground disturbance or construction activities. Additionally, Mitigation Measure CUL-3 includes discovery protocol requirements in the event that paleontological resources are encountered during construction. Therefore, project impacts to paleontological resources would be less than significant with mitigation.

As previously discussed, the 2040 General Plan EIR identified that implementation of the 2040 General Plan could result in significant and unavoidable impacts related to the disturbance or loss of paleontological resources due to ground-disturbing activities. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

In accordance with Mitigation Measure CUL-1c of the 2040 General Plan EIR, Mitigation Measure CUL-3, listed above in Section 5, *Cultural Resources*, would be implemented to reduce potential impacts to paleontological resources.

In addition, the following uniformly applied development policies or standards would be incorporated into the project:

- Ventura County Building Code
- National Pollutant Discharge Elimination System
- Ventura County Stormwater Quality Management Ordinance
- California Building Code
- **2040 General Plan Implementation 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 feasible
  - 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 archaeologist, paleontologist, or Native American monitor can access the discovery. A report or memorandum shall be prepared by the qualified monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources. Recommendations or mitigation identified by the qualified monitor shall be implemented prior to commencing or continuing project activities and/or construction.

- **2040 General Plan Policy HAZ-4.3: Structural Design:** The County shall require that all structures designed for human occupancy incorporate engineering measures to reduce the risk of and mitigate against collapse from ground shaking.
- **2040 General Plan Policy HAZ-4.5: Soil Erosion and Pollution Prevention:** The County shall require discretionary development be designed to prevent soil erosion and downstream sedimentation and pollution.
- **2040 General Plan Policy HAZ-4.6: Vegetative Resource Protection:** The County shall require discretionary development to minimize the removal of vegetation to protect against soil erosion, rockslides, and landslides.
- **2040 General Plan Policy HAZ-4.7: Temporary Revegetation on Graded Areas:** The County shall require, as necessary, the use of soil stabilization methods on graded areas to reduce the potential for erosion, particularly during the construction phase.
- **2040 General Plan Policy HAZ 4.16: Subsidence and Hydroconsolidation Hazard-Structural Design:** Structural design of buildings and other structures shall recognize the potential for subsidence and hydroconsolidation and provide mitigation recommendations for structures that may be affected.

## Conditions of Approval and Impact Minimization Measures

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

### **Condition of Approval Number C-19: Grading Permit**

The Permittee shall submit a grading plan showing existing and proposed elevations to the Public Works Agency's Land Development Services Division for review and approval. If a grading permit is required, a civil engineer registered in the State of California must prepare and submit the grading plans, geotechnical and hydrology reports as necessary, to Land Development Services Division for review and approval. The Permittee must post sufficient surety in order to ensure proper completion of the proposed grading.

### **Condition of Approval Number C-20: Drainage Plan**

The Permittee shall submit drainage plans and hydrologic and hydraulic calculations, which are prepared by a civil engineer registered in the State of California, to the Public Works Agency's Land Development Services Division for review and approval.

### **Condition of Approval Number A-19: Compliance with Stormwater Development Construction Program**

The construction of the project shall meet requirements contained in Part 4.F., "Development Construction Program", of the Los Angeles Regional Water Quality Control Board NPDES Municipal Stormwater Permit, No. CAS004002 through the inclusion of an effective combination of construction best management practices (BMPs) during all ground disturbing activities.

### **Condition of Approval Number A-20: State Construction General Stormwater Permit No. CAS000002 Requirements**

To ensure compliance with all water quality provisions in NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, No. CAS000002 (CGP), the Permittee shall ensure the proper filing of all compliance documents required under the CGP.

**Condition of Approval Number C-47: Building Plan Review**

The Permittee shall submit building plans of all A, E, I, H, R-1, R-2 or R-4 occupancies that comply with the California Building Code requirements.



## 8 Greenhouse Gas Emissions

### Summary of Findings

With regard to GHGs, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. No mitigation measures contained within the 2040 General Plan EIR would be required because project specific impacts would be less than significant.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts related to GHG emissions.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>8. Greenhouse Gas Emissions</b>						
Would the project:						
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	GP EIR pp. 4.8-37 to 4.8-49 Impact 4.8-1	No	No	No	No	Yes
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	GP EIR pp. 4.8-49 to 4.8-52 Impact 4.8-2	No	No	No	No	Yes

### Discussion

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would potentially generate greenhouse gas (GHG) emissions, both directly and indirectly, that contribute cumulatively to climate change and result in a significant and unavoidable impact, even after applying proposed

mitigation measures and reduction programs (Impact 4.8-1). The 2040 General Plan EIR identified that, while many of the policies identified would support GHG reduction measures as part of future development under the 2040 General Plan, they do not, on their own, specify the detailed steps that would be needed to achieve GHG reduction. The analysis ultimately concluded that the policies meant to reduce GHG emissions in Ventura County do not contain enough specificity for their numeric contribution to the established 2030 and 2040 targets to be quantified and recommended the implementation of Mitigation Measures GHG-1, GHG-2, GHG-3, and GHG-4, each containing implementation programs. The 2040 General Plan EIR also proposes the implementation of Mitigation Measures CTM-1, CTM-2, and CTM-3.

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would potentially conflict with applicable plans, policies, or regulations adopted for the purpose of reducing greenhouse gas emissions (Impact 4.8-2). The 2040 General Plan EIR determined that because the 2040 General Plan would likely not, on its own, result in a sufficient level of GHG reductions for Ventura County to meet the longer-term goal for 2050 expressed in Executive Order (EO) S-3-05, or the 2030 target established by Senate Bill (SB) 32, the impact would be potentially significant and Mitigation Measures GHG-1, GHG-2, GHG-3, GHG-4, CTM-1, CTM-2, and CTM-3 were recommended. Despite the application of Mitigation Measures GHG-1, GHG-2, GHG-3, GHG-4, CTM-1, CTM-2, and CTM-3, the analysis concluded that while the 2040 General Plan would set future GHG emissions on a downward trajectory consistent with State reduction targets and would not conflict with State GHG reduction targets and recommended local actions established in the 2017 Scoping Plan, it could not be determined at a programmatic level of analysis that future emissions within Ventura County would meet State 2030 and post-2030 targets for GHG reduction. The impact was, therefore, determined to be significant and unavoidable. The most current GHG reduction plan applicable to the project is the Ventura County Climate Action Plan (CAP), which was incorporated into the 2040 General Plan and adopted along with the 2040 General Plan in September of 2020. The ultimate objective of the CAP is to identify and reduce community GHG emissions from existing and future activities and sources within the unincorporated areas of Ventura County. The Ventura County CAP'S GHG reduction goals are tied to the state's GHG reduction targets for 2020 and 2030 (outlined in Assembly Bill [AB] 32 of 2006 and SB 32, respectively), the horizon year for the 2040 General Plan, and a longer-term state policy goal for 2050 (EO S-3-05).

An Air Quality and Greenhouse Gas Emissions Study was prepared for the project and includes an analysis of the GHG emissions associated with the project (Appendix A). As described therein, the 2040 General Plan serves as the County's CAP by including both a GHG Reduction Strategy and Climate Adaptation Strategy that are integrated throughout the 2040 General Plan. However, Ventura County has not adopted a numerical significance threshold or post-2030 GHG reduction measures aligned with the statewide 2045 carbon neutrality goal. Additionally, the Governor's Office of Land Use and Climate Innovation (formerly known as the Governor's Office of Planning and Research), CARB, California Air Pollution Control Officers Association, nor any other State or applicable regional agency has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the project.

In the absence of any adopted or accepted numeric threshold, the significance of the project's GHG emissions are evaluated in accordance with CEQA Guidelines Sections 15064.4(b) and 15064(h)(3) by considering whether the project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this project, as a land use development project, the most applicable adopted regulatory plans to reduce GHG emissions and mitigate the effects of climate change are the

2022 CARB Scoping Plan, SCAG 2024 RTP/SCS, and 2040 General Plan. The GHG emissions from the construction and operation of the project are provided for informational purposes.

The project would result in GHG emissions associated with construction from the use of off-road equipment, material delivery trips, and on-road vehicle trips associated with worker commute trips. However, it is recognized by multiple air quality planning agencies, in their respective CEQA guidance documents, that construction-related GHG emissions from projects occur over a relatively short-term period of time and contribute a relatively small portion of the overall lifetime project GHG emissions.<sup>14, 15</sup> As described further in the Air Quality and Greenhouse Gas Emissions Study, project construction emissions were estimated at 1,859 metric tons of carbon dioxide equivalent (CO<sub>2</sub>e), which, when amortized over a 30-year project life, equates to 62 metric tons of CO<sub>2</sub>e per year. Operation of the project would result in GHG emissions typical of residential development and were estimated at 2,583 metric tons of CO<sub>2</sub>e per year including the amortized construction emissions. The primary source of GHG emissions during project operation would be primarily from mobile sources (vehicle trips), electricity use, water consumption, and waste generation.

The project would be designed to be 100 percent electric, include solar panels, and provide electric vehicle charging stations in accordance with CALGreen requirements. Electricity used by the project would be supplied by Southern California Edison, which is subject to Senate Bill 100 and Senate Bill 1020, requiring that eligible renewable and zero-carbon resources supply 90 percent of retail electricity by 2035, 95 percent by 2040, and 100 percent by 2045. Additionally, the project aligns with the State's goal by supporting affordable housing development, reducing vehicle miles traveled, and preserving open space. Its design and operational features are consistent with the 2022 CARB Scoping Plan, SCAG's 2024–2050 RTP/SCS, and the Ventura County CAP.

As previously discussed, the 2040 General Plan EIR identified that implementation of the 2040 General Plan could result in significant and unavoidable impacts related to greenhouse gas emissions due to the inability to quantify the effectiveness of reduction policies at a programmatic level. The project would be fully electric, would include solar panels and EV charging stations, and would align with applicable state and regional GHG reduction plans, including the Ventura County CAP. Project-level impacts would be less than significant. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

The 2040 General Plan EIR does not include GHG-related mitigation measures that would apply to the project. The following uniformly applied development policies or standards would be incorporated into the project:

- CALGreen (Title 24, Part 11)
- California Building Energy Efficiency Standards (Title 24, Part 6)

<sup>14</sup> South Coast Air Quality Management District. 2008. Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans. Available: [https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2). Accessed October 2025.

<sup>15</sup> Bay Area Air Quality Management District. 2022. 2022 CEQA Guidelines. Available: [https://www.baaqmd.gov/~/\\_media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqaguidelines-chapter-6-project-climate-impacts\\_final-pdf.pdf?rev=ce3ba3fe9d39448f9c15bbabd8c36c7f&sc\\_lang=en](https://www.baaqmd.gov/~/_media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqaguidelines-chapter-6-project-climate-impacts_final-pdf.pdf?rev=ce3ba3fe9d39448f9c15bbabd8c36c7f&sc_lang=en). Accessed October 2025.

- **2040 General Plan Section B.1.5: GHG Implementation Programs.** GHG implementation programs provide pathways to attain the specific qualitative and quantitative GHG reductions for policies contained in the General Plan. These programs vary considerably, depending on the method, timing, and individual approach. Some GHG reduction policies are programmatic in nature and require further study or subsequent action to fund, develop and implement a new program, form a new partnership, or engage with or support the efforts of other agencies or organizations. Other GHG programs are regulatory in nature and would require the County to amend codes, standards, or specifications and would be implemented through the development review and permitting process.

### **Conditions of Approval and Impact Minimization Measures**

The project would not incorporate conditions of approval and impact minimization measures related to greenhouse gas emissions.

## 9 Hazards and Hazardous Materials

### Summary of Findings

With regard to Hazards, Hazardous Materials the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. No mitigation measures were included within the 2040 General Plan EIR, and none would be required because project specific impacts would be less than significant.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts to hazards, hazardous materials, and wildfire.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>9. Hazards, Hazardous Materials, and Wildfire</b>						
Would the project:						
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	GPEIR pp.4.9-11 to 4.9-13 Impact 4.9-1	No	No	No	No	Yes
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	GPEIR pp.4.9-13 to 4.9-14 Impact 4.9-2	No	No	No	No	Yes
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	GPEIR pp.4.9-14 to 4.9-16 Impact 4.9-3	No	No	No	No	N/A

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	GPEIR pp.4.9-16 to 4.9-17 Impact 4.9-4	No	No	No	No	Yes
e. Locate inconsistent land uses within the sphere of influence of any airport, or otherwise result in a safety hazard to people residing or working near an airport?	GPEIR pp.4.9-17 to 4.9-19 Impact 4.9-5	No	No	No	No	N/A
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	GPEIR pp.4.9-19 to 4.9-24 Impact 4.9-6	No	No	No	No	Yes
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	GPEIR pp.4.9-19 to 4.9-24 Impact 4.9-6	No	No	No	No	Yes

## Discussion

- a. *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would accommodate future development that could involve the use, storage, disposal, and transportation of hazardous materials or hazardous waste that could create a significant hazard (Impact 4.9-1). However, as identified in the 2040 General Plan EIR, County activities and discretionary development would be required to comply with State law, federal law, and 2040 General Plan policies and implementation programs that would substantially lessen potential impacts related to the use, storage, transport, or disposal of hazardous materials or hazardous waste. For example, Policies HAZ-5.1, HAZ-5.3, HAZ-5.4, HAZ-5.6, and HAZ-12.3 address hazardous materials by directing Ventura County to manage its hazardous materials and provide regulatory oversight for discretionary projects and all facilities that store, use, or handle hazardous materials. This impact was concluded to be less than significant.

During construction, routine transport, use, and disposal of potentially hazardous materials such as fuels, lubricants, and solvents would occur. During operation, routine use and on-site storage of small quantities of common household hazardous materials such as cleaning agents, fertilizers, pesticides, and landscaping maintenance materials would occur. However, federal, State, and local regulations regulate the storage, use, transport, and disposal of hazardous materials. The project would be subject to compliance with existing hazardous materials regulations, which are codified in the California Code of Regulations Titles 8, 22, and 24 and their enabling legislations outlined in Health and Safety Code Chapter 6.95. Compliance with federal, State, and local requirements would minimize health and safety risks to people or structures associated with hazardous materials stored, used, transported, and disposed of during construction and operation of the project. Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to the routine use, storage, disposal, or transport of hazardous materials, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment (Impact 4.9-2). Hazardous materials and hazardous waste are regularly used and transported in the county. Although such activities involve strict regulations under State and federal law regarding monitoring and handling, accidental release of hazardous materials or hazardous waste due to natural disasters, human error, or misuse is possible. Numerous federal, State, and local regulations exist to protect people and the environment from potential accidental release of hazardous materials or hazardous waste. Additionally, the 2040 General Plan EIR identified policies and implementation programs that would help protect people and the environment from accidental upset of hazardous materials or hazardous waste. For example, Policies HAZ-5.1, HAZ-5.3, HAZ-5.4, HAZ-5.6, and HAZ-12.3 address hazardous materials by directing the County to manage its hazardous materials and provide regulatory oversight for discretionary development and all facilities that store, use, or handle hazardous materials, thus reducing the potential for accidental upset or spill. The 2040 General Plan EIR concluded that compliance with applicable federal, State, and local regulations and 2040 General Plan policies related to the transportation, use, storage, and disposal of hazardous materials and hazardous waste would minimize the potential for accidental release to occur and provide planning mechanisms for prompt and effective cleanup if an accidental release did occur. Therefore, impacts related to accidental hazardous materials or waste release were concluded to be less than significant.

A Phase I Environmental Site Assessment (Phase I ESA) was prepared by Rincon in March 2025 (Appendix H). The Phase I ESA identified environmental concerns such as historical agricultural use associated with pesticide application, the presence of abandoned aboveground storage tanks (ASTs), and minor soil staining near stored equipment, but no active releases or conditions posing immediate risk were observed. To address these concerns and minimize potential hazards during redevelopment, the Phase I ESA recommended conducting a subsurface investigation in areas planned for ground disturbance, preparing a Soil Management Plan to manage residual contamination(if present),

properly removing and disposing of stored equipment and ASTs, and performing asbestos-containing materials (ACM) and lead-based paint (LBP) surveys prior to any demolition onsite structures and grading. Soil sampling was conducted by Stantec in May 2025, which found that the site soils do not contain metals or pesticides at concentrations that exceed residential screening levels (refer to Appendix H for soil sampling laboratory results). Therefore, a soil management plan is not required. Condition of Approval No. A-17 would require a hazardous building materials survey and proper disposal of ACM, LBP, and other hazardous building materials in compliance with Title 40 of the Code of Federal Regulations. Implementation of Condition of Approval No. A-17 would ensure compliance with local, state, and federal policies regarding the proper disposal of hazardous materials during project construction, thereby minimizing the potential upset or accident conditions that could result in the release of hazardous materials into the environment.

Operation of the project would not involve the use or storage of significant quantities of hazardous materials. Hazardous materials use, storage, and disposal would be limited to common household hazardous materials such as cleaning projects, pesticides, and landscaping maintenance products. The use, storage, disposal, and transport of typical household hazardous materials would comply with the applicable regulations, and project operation would not be anticipated to result in a significant hazard due to upset or accident conditions involving the release of hazardous materials. Impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in the use, storage, disposal, or transport of hazardous materials within 0.25-mile of an existing or proposed school (Impact 4.9-3). However, as identified in the 2040 General Plan EIR, federal and State regulations exist to protect public health and the environment from hazardous emissions and hazardous materials handling. When a project located within 0.25-mile of a school involves the construction or alteration of a facility that might emit or handle acutely hazardous materials in a quantity equal to or greater than that specified in Section 25536(a) of the Health and Safety Code, the lead agency must consult with the affected school district regarding the potential impact of the project when circulating the environmental document and notify the affected school district in writing prior to approval and certification of the environmental document. Moreover, all Ventura County permits that include storage, handling, transport, emission and disposal of hazardous substances must comply with local, State, and federal regulations. Hazardous materials are governed by regulations that require proper storage and handling, business and environmental management plans, spill contingency plans, employee and public noticing, and other emergency preventive and response measures to minimize the risk of accidental releases and related environmental effects. California Government Code Section 65850.2 requires that a final certificate of occupancy or its substantial equivalent cannot be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code Sections 25500 through 25520. This impact was concluded to be less than significant.



The nearest school to the project site is La Petite Academy of Ventura, located approximately 2.1 miles southwest of the project site. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of a school. There would be no impact to schools related to hazardous materials.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to the use, storage, disposal, or transport of hazardous materials within 0.25 mile of an existing or proposed school, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in future development on or near a site identified in one of the regulatory databases, compiled pursuant to Government Code Section 65962.5 (Impact 4.9-4). However, as identified in the 2040 General Plan EIR, federal and State regulations exist that prevent or reduce hazards to the public and environment from existing hazardous waste sites or hazardous substances release sites. These regulations include the Occupational Safety and Health Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Superfund Amendments and Reauthorization Act Title III; the Resource Conservation and Recovery Act; and the Toxic Substances Control Act. These regulations protect people and the environment through guidelines that require proper storage and handling, business and environmental management plans, spill contingency plans, employee and public noticing, and other emergency preventive and response measures to minimize the risk of accidental releases and related environmental effects. This impact was concluded to be less than significant.

The project site is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. There is one cleanup program site approximately 550 feet southwest of the project site, located at 4704 Crooked Palm Road. However, the site cleanup has been completed, and the case was closed as of October 21, 1996.<sup>16, 17</sup> As described under *Impact 9b.*, contamination may be present on the project site due to its historical agricultural use. To address these concerns and minimize potential hazards during redevelopment, the project would implement the recommendations of the Phase I ESA including a subsurface investigation in areas planned for ground disturbance, preparing a Soil Management Plan to manage residual contamination, properly removing and disposing of stored equipment and ASTs, and performing ACM and LBP surveys prior to any demolition or renovation of onsite structures. Implementation of these recommended strategies would ensure compliance with local, state, and federal policies regarding soil contamination and the proper disposal of hazardous materials during project construction. With compliance with existing regulations, impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to development on or near a site identified in one of the regulatory databases, compiled pursuant to Government Code Section 65962.5, and the project would not result in a significant impact for this

<sup>16</sup> State Water Resources Control Board. 2025. GeoTracker. Available: <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=4884+North+Ventura+Avenue>. Accessed September 2025.

<sup>17</sup> Department of Toxic Substances Control. 2025. Envirostor. Available: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=4884+North+Ventura+Avenue>. Accessed September 2025.

topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- e. Locate inconsistent land uses within the sphere of influence of any airport, or otherwise result in a safety hazard to people residing or working near an airport?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not introduce incompatible land uses within the airport safety zones. The 2040 General Plan EIR identified some activities allowed to occur under the land use designations of the General Plan, such as future residential, commercial, and industrial development, which would increase the number of people residing or working near an airport, who in turn could be exposed to aircraft hazards (Impact 4.9-5). However, as identified in the 2040 General Plan EIR, federal and State regulations prevent public and environmental hazards near airports. These include FAA regulations, which establish safety standards for civil aviation, and the State Aeronautics Act, which establishes air safety standards. This impact was concluded to be less than significant.

The project site is approximately 10 miles northwest of Oxnard Airport and not within an Airport Influence Area or Compatibility Zone.<sup>18</sup> The project is not located within the immediate vicinity of an airport and therefore would not substantially increase the risk of people living or working in these areas to hazards associated with airport operations. Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the project area, and impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to a safety hazard or excessive noise for people residing or working in the project area, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*
- g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

The 2040 General Plan EIR found that implementing the 2040 General Plan could expose people to wildfire risks by placing development in high fire hazard severity zones (FHSZs) and potentially impair emergency response or evacuation plans (Impact 4.9-6). While the Ventura County 2021 Emergency Operations Plan (EOP) addresses large-scale disasters, it does not cover routine emergencies. The 2040 General Plan EIR noted that the 2040 General Plan would not alter the EOP or other emergency plans, and future development would be incorporated into EOP updates. The County has adopted several wildfire mitigation programs, including the Multi-Hazard Mitigation Plan and the Community Wildfire Protection Plan, which guide fuel reduction and structural safety efforts. The Fire Hazard Reduction Program mandates 100 feet of brush clearance around structures near hazardous fire areas. Local emergency plans and federal/state building codes also help reduce fire risk. However,

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<sup>18</sup> Ventura County. 2000. Airport Comprehensive Land Use Plan. Available: <https://www.goventura.org/wp-content/uploads/2018/03/2000-airport-land-use-for-ventura-county.pdf>. Accessed September 2025.

wildfire threats extend beyond FHSZs, and while regulations help mitigate risk, they cannot eliminate it entirely. Therefore, the 2040 General Plan EIR concluded that impacts related to the impairment of adopted emergency response and evacuation plans and the expose of people and structures to wildland fires would be significant and unavoidable.

Neither the CEQA Guidelines nor the County of Ventura have established a time-based threshold for evaluating the potential significance of project impacts with respect to emergency evacuation. Public safety, not time, is the guiding consideration for evaluating impacts related to emergency evacuation. The County considers a project's impact on evacuation significant if the project would significantly impair or physically interfere with implementation of an adopted emergency response or evacuation plan or if the project would expose people or structures to a significant risk of loss, injury, or death involving wildland fires. For purposes of promoting informed decision making, a Wildfire Evacuation Study was prepared by Dudek in June 2025 to assess evacuation time performed under various scenarios with and without the project (Appendix I). The study was conducted in accordance with the Ventura County Operational Area Emergency Operations Plan (OA EOP) and the Ventura County All Hazards Evacuation Plan and also considered the City of Ventura's Emergency Operations Plan due to the project's proximity to the city. The project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ), and the study evaluated three wildfire evacuation scenarios using conservative assumptions, including mass evacuation modeling with and without the project.

The Wildfire Evacuation Study concluded that the project would not substantially impair an adopted emergency response plan or emergency evacuation plan. The Wildfire Evacuation Study found that under current conditions, the estimated time to evacuate existing land uses in the project area is 43 minutes. The estimated time to evacuate residents of the project would be approximately 37 minutes. The estimated time to evacuate all populations in the vicinity including existing land uses and future residents of the project would be approximately 58 minutes, an increase of 15-minutes compared to existing conditions. Under future cumulative conditions considering ambient growth in the project area, the estimated evacuation time would be 59 minutes. The project includes two access points on Ventura Avenue and a gated emergency vehicle access road to Floral Drive, providing a secondary north/south evacuation route. The project would comply with Section 8107-41.1 of the NCZO (Condition of Approval No. C-17) and ensure adequate fire department access in accordance with current California State Law, VCFD Ordinance, and applicable standards. The project would maintain emergency access and public safety throughout construction (Condition of Approval Nos. C-52-C-53). During operation, the project would not block or modify existing evacuation routes and maintain adequate emergency access. Furthermore, the project would incorporate ignition-resistant construction materials, defensible space, and fuel modification zones, and include contingency planning such as shelter-in-place options and PACE (Primary, Alternate, Contingency, Emergency) evacuation strategies.

The success rate of the County in safely managing both mass and targeted evacuations is high. For example, the 2017 Thomas Fire caused 31 evacuation orders to more than 90,000 residents, with CAL FIRE and VCFD reporting one civilian and one firefighter fatality.<sup>19</sup> Losses of life in virtually every large wildfire were related to persons who ignored initial evacuation warnings, many of whom were located in rural areas with long, exposed evacuation routes. Technological advancements and improved evacuation strategies learned from prior wildfire evacuation events have resulted in a system that is many times more capable of managing evacuations. With the technology in use today in the County, evacuations are more strategic and surgical than in the past, evacuating smaller areas at highest risk

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<sup>19</sup> Ventura County. 2024. All Hazards Evacuation Plan. Available: [https://vcportal.venturacounty.gov/BOS/District2/docs/macsv/Evac-Plan\\_OES-FINAL\\_240930.pdf](https://vcportal.venturacounty.gov/BOS/District2/docs/macsv/Evac-Plan_OES-FINAL_240930.pdf). Accessed November 2025.

and phasing evacuation traffic so that it flows more evenly and minimizes the surges that may slow an evacuation. Mass evacuation scenarios where large populations are all directed to leave simultaneously, resulting in traffic delays, are thereby avoided, and those populations most at risk are safely evacuated. As implemented in past wildfire evacuations, an early evacuation of the area may occur several or more hours prior to actual threatening conditions in the project area, depending on conditions and fire spread projections.

In an evacuation, the project occupants and surrounding residents would primarily utilize SR 33 and U.S. Route 101. Based on the typical road capacity, an evacuation of the project site and surrounding land uses, under worst-case conditions, would take approximately 59 minutes to evacuate if all traffic was using the SR 33. This does not account for potentially reduced evacuation times if traffic was spread across SR 33 and U.S. Route 101. The project would provide emergency managers the alternative option of recommending occupants to temporarily seek refuge on site in fire-resistant buildings or within the converted landscapes and hardscapes that would not readily facilitate wildfire spread. This would provide emergency managers with a safer alternative to risking a late evacuation. Additionally, the project would provide a new north/south evacuation route that would supply secondary access for the project as well as the community to the north. Further, the project does not propose to cut off or otherwise modify existing evacuation routes. Considering these facts, the project would not interfere with evacuation response planning, and would not result in inadequate emergency access. . Therefore, impacts related to emergency evacuation and response planning would be less than significant.

Based on the Wildfire Hazard Memorandum prepared by Dudek in October 2025, the project would not exacerbate wildfire risks, nor would it expose project occupants to significant risk of loss, injury, or death involving wildland fires (Appendix J). Although the site is located within a VHFHSZ and adjacent to steep terrain that could channel winds and intensify fire behavior, the project would incorporate robust design measures including ignition-resistant construction, 200 feet of fuel modification zones, and fire-resistive landscaping. These features would significantly reduce flame lengths, ember spotting, and fire intensity under worst-case scenarios. The project would also provide proper premise identification and ensure sufficient water supply for firefighting purposes (Condition of Approval Nos. B-14, C-30-C-39, and C-41). To support emergency response, the project would install fire hydrants capable of meeting required fire flow and duration, and facilitate rapid hydrant location (Condition of Approval Nos. B-14 and C-39-C-41). Fire risks associated with the project would be minimized through design measures aimed at reducing impacts on the community's fire protection system and lowering hazardous fuel loads around the development to enhance wildfire protection (Condition of Approval Nos. C-48-C-51). Therefore, the project would not expose people or structures to significant risk related to wildland fire, and impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR identified that implementation of the 2040 General Plan could result in significant and unavoidable impacts related to wildfire risk and emergency evacuation planning, particularly for development located within VHFHSZ. The project would incorporate fire-resistive design features, maintain emergency access, and comply with applicable fire protection and evacuation planning requirements, and impacts would be less than significant. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

## **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

Mitigation measures were not identified in the 2040 General Plan EIR. The following uniformly applied development policies or standards applicable to hazards, hazardous materials, and wildfire would be incorporated into the project:

- Ventura County Fire Department Codes, Ordinances, and Standards
- California Building Code
- California Fire Code
- California Code of Regulations Title 22
- VCAPCD Rule 62.7, Asbestos Demolition and Renovation
- Hazardous Materials Transportation Act
- Resource Conservation and Recovery Act
- California Hazardous Material Management Act
- Toxic Substances Control Act
- Occupational Safety and Health Act
- **2040 General Plan Policy PFS-7.4: Discretionary Development Utility Service Line Placement.** The County shall require discretionary development to place new utility service lines underground if feasible. If undergrounding is determined by the County to be infeasible, then new utility service lines shall be placed in parallel to existing utility rights-of-way, if they exist, or sited to minimize their visual impact.

## **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

### **Condition of Approval Number B-14: Water Mains (Land Divisions)**

The Permittee shall design water mains capable of providing a fire flow of 2,000 gallons per minute at 20 psi and a minimum two-hour duration. The water mains shall be installed from the public right-of-way, or from the purveyor's point of connection to the property line east of Parcel No. 063-0-110-090.

### **Condition of Approval Number C-17: Undergrounding of All Electric, Cable, Phone, and Internet Lines**

Pursuant to General Plan Policy PFS-7.4, the undergrounding of all electric, cable, phone, and gas lines shall be required. The Permittee shall submit proposed grading and building plans denoting utility service lines to the Planning Division for review and approval.

### **Condition of Approval Number C-30: Private Access Road Design**

The Permittee shall design all new private roads in accordance with Public Road Standards and any additional design requirements outlined in the conditions of approval for the project below, unless modified by the Fire District. All required Fire Access Roads and Driveways, along with cross section(s), shall be shown on the final map or parcel map.

**Condition of Approval Number C-31: Projects Having More Than 100 Dwelling Units or 200 Guest Rooms**

The Permittee shall design the project such that multiple-family residential projects having more than 100 dwelling units or more than 200 guest rooms or a combination thereof, are provided throughout the project with two separate and approved fire apparatus access roads, including secondary access to the site. Access roadways within the project and serving 24 dwelling units or 48 guest rooms may not exceed 400 feet dead-end length.

**Condition of Approval Number C-32: Access Road Certification**

The Permittee shall have all access road(s)/driveway(s) certified by a registered Civil Engineer as having an all-weather surface in conformance with Public Works and / or Fire District Standards.

**Condition of Approval Number C-33: Fire Lanes**

The Permittee shall post all fire lanes in accordance with California Vehicle Code, the International Fire Code and current Ventura County Fire Department Fire Lane Standards. All fire lane markings / signs shall be located within recorded access easements. The Permittee shall maintain all required fire lane markings / signs to be clearly visible.

**Condition of Approval Number C-36: Private Road/Driveway Maintenance Agreement and Fund**

The Permittee shall execute a Road Maintenance Agreement to ensure continuous access by fire apparatus. A Road Maintenance Agreement shall be entered into and be binding on all owners of any parcel within the development. The maintenance agreement shall include all access road improvements (including surfacing, drainage control, vertical clearance, hazard abatement and signs / markings) for this development. On-going road maintenance shall be performed as required to maintain the road and at any time as requested by the Fire Department. The road maintenance agreement shall be approved by the Fire District. This condition can be satisfied by inclusion within a Homeowners or Property Owners Association (HOA / POA) CC&Rs and dues assessments. If included within CC&R's, an overriding statement shall be included that indicating that access road maintenance requirements and funding provisions shall not be revised or eliminated without written approval of the Fire District

**Condition of Approval Number C-37: Access Road Gates**

The Permittee shall design and install all gates along required fire access roads/driveways consistent with Fire Protection District Standards.

**Condition of Approval Number C-38: Walk and Pedestrian Gates**

The Permittee shall provide a Knox System on all walk / pedestrian gates serving the project area.

**Condition of Approval Number C-39: Fire Flow**

The Permittee shall verify that the water purveyor can provide the required volume and duration at the project. The minimum required fire flow shall be determined as specified by the current adopted edition of the Ventura County Fire Code and the applicable Water Manual for the jurisdiction (whichever is more restrictive). Given the present plans and information, the required fire flow is approximately 2,000 gallons per minute at 20 psi for a minimum two hour duration. A minimum flow of 1,000 gallons per minute shall be provided from any one hydrant. Note: For Commercial, Industrial, Multi-family buildings, a minimum fire flow of 1,000 GPM shall be provided from each hydrant when multiple hydrants are flowing at the same time.

**Condition of Approval Number C-40: Fire Hydrant(s)**

The Permittee shall provide fire hydrant(s) per the current adopted edition of the Ventura County Fire Code, Appendix C. Design and installation shall conform to the minimum standard of the Ventura County Water Works Manual.

**Condition of Approval Number C-41: Hydrant Location Markers**

The Permittee shall install blue reflective fire hydrant location markers on the access road per Ventura County Fire Department Standards.

**Condition of Approval Number C-42: Fire Sprinklers**

The Permittee shall be responsible to have an automatic fire sprinkler system installed in all structures as required by the VCFD. The fire sprinkler system shall be designed and installed by a properly licensed contractor under California State Law.

**Condition of Approval Number C-43: Fire Alarm**

The Permittee shall be responsible to have a fire alarm system installed in all structures. The fire alarm system shall be designed and installed by a properly licensed contractor under California State Law.

**Condition of Approval Number C-48: Hazardous Fire Area**

The Permittee shall construct all structures to meet hazardous fire area building code requirements.

**Condition of Approval Number C-49: Hazard Abatement**

In lieu of the additional access separation an additional 100-foot brush mitigation measure is required, for a total of 200 feet of brush clearance overall-the first 100 feet is regular brush clearance and the remaining 100 feet being a fuel modification thinning zone from the buildings as a buffer where the wildfire threat is located. Conservation Parcel-Option A -provide an easement for the additional brush clearance area specifically identified as a brush clearance modification zone per VCFD Standards. Indicate and call out this area on the proposed map and provide in all documents to be recorded. Option B-Adjust the parcel line to incorporate the fuel modification zone of 200 feet to be located within the entirety of the existing parcel where the buildings are to be located.

**Condition of Approval Number C-50: Fire Protection Plan**

The Permittee shall prepare a Fire Protection Plan (FPP). The FPP shall be prepared by a qualified fire protection consultant as approved by the Ventura County Fire Department. The Permittee, all land owners and any tenants shall abide by the approved FPP.

**Condition of Approval Number C-51: Fuel Modification Plans**

The Permittee shall prepare a Fuel Modification Plan (FMP).

**Condition of Approval Number C-52: Fire Department Clearance**

The Permittee shall obtain VCFD Form 610B "Requirements for Construction" for any new structures or additions to existing structures before issuance of building permits.

**Condition of Approval Number C-53: Phasing Plan**

The Permittee shall submit a phasing plan indicating phases, material staging locations and employee parking areas.

# 10 Hydrology and Water Quality

## Summary of Findings

With regard to Hydrology and Water Quality, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. No mitigation measures were included within the 2040 General Plan EIR, and none would be required because project specific impacts would be less than significant.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts to hydrology and water quality.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>10. Hydrology and Water Quality</b>						
Would the project:						
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	GP EIR pp.4.10-11 to 4.10-13 Impact 4.10-4	No	No	No	No	Yes
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	GP EIR pp.4.10-6 to 4.10-11 Impact 4.10-1, Impact 4.10-2, Impact 4.10-3, Impact 4.10-5	No	No	No	No	N/A
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:						



Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
i. Result in substantial erosion or siltation on- or off-site;	GP EIR pp.4.10-19 Impact 4.10-12	No	No	No	No	Yes
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site;	GP EIR pp.4.10-18; pp. 4.10-20 Impact 4.10-10, Impact 4.10-11, Impact 4.10-13	No	No	No	No	Yes
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	GP EIR pp.4.10-19; pp. 4.10-21 to 4.10-22 Impact 4.10-12, Impact 4.10-15, Impact 4.10-16	No	No	No	No	Yes
iv. Impede or redirect flood flows?	GP EIR pp.4.10-20 to 4.10-21 Impact 4.10-13 Impact 4.10-14	No	No	No	No	Yes
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	GP EIR pp. 4.10-17 to 4.10-18, p.4.10-20 Impact 4.10-9, Impact 4.10-10, Impact 4.10-11, Impact 4.10-13	No	No	No	No	N/A
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	GP EIR pp.4.10-11 to 4.10-13 and 4.10-16 to 4.10-17 Impact 4.10-4, Impact 4.10-8	No	No	No	No	Yes

## Discussion

### *a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality (Impact 4.10-4). The 2040 General Plan EIR identified that various groundwater quality regulations exist throughout the county. For instance, the County Subdivision

Ordinance includes provisions meant to ensure adequate provision of water, to protect water supply, and to protect surface water and groundwater quality. Pursuant to ISAG, potential effects on water quality are determined in relationship to the objectives and beneficial uses in the applicable Basin Plan to ensure consistent and complete assessment of potential impacts. The Basin Plan contains the regulations adopted by the Regional Water Quality Control Board (RWQCB) to control the discharge of waste and other controllable factors affecting the quality of waters of the State. RWQCB orders cite the Basin Plan's water quality standards, prohibitions, and other programs of implementation applicable to a particular discharge or category of discharge. The 2040 General Plan EIR concluded compliance with these requirements would eliminate or substantially lessen impacts to water quality and the impact was less than significant.

The 2040 General Plan EIR identified that the State Water Resources Control Board (SWRCB) and the RWQCBs, through powers granted by the federal Clean Water Act, require specific permits for a variety of activities that have potential to discharge pollutants to waters of the State and adversely affect water quality. To receive a National Pollutant Discharge Elimination System (NPDES) permit, a notice of intent to discharge must be submitted to the RWQCB and design and operational BMPs must be implemented to reduce the level of contaminated runoff. BMPs can include the development and implementation of regulatory measures (local authority of drainage facility design), various practices, including educational measures (workshops informing public of what impacts result when household chemicals are dumped into storm drains), regulatory measures (local authority of drainage facility design), public policy measures (label storm drain inlets as to impacts of dumping on receiving waters), and structural measures (filter strips, grass swales, and retention basins). All NPDES permits also have inspection, monitoring, and reporting requirements. This impact was concluded to be less than significant.

The project would comply with all applicable water quality regulations during both construction and operation. Construction activities would follow Ventura County Building Code requirements, including Ordinance Code No. 4450 (Stormwater Quality Management), and implement BMPs per the SWRCB's Construction General Permit (Order 2022-0057-DWQ). A stormwater pollution prevention plan would be prepared to minimize water pollution during grading and construction, and would include BMPs such as proper storage and handling of fuels, lubricants, and paints, the installation of silt fences and erosion control blankets, and the covering of stockpiled materials (Condition of Approval Nos. A-19 and A-20). With compliance with these regulations, construction would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Post-construction BMPs would be implemented in accordance with Condition of Approval No. C-19 and the Los Angeles Regional Water Quality Control Board NPDES Municipal Stormwater Permit (No. CAS004002), ensuring long-term protection of surface water quality. A Post Construction Stormwater Management Plan was prepared for the project in March 2024, which identifies infiltration basins designed to retain and treat stormwater consistent with County standards, minimizing the potential for the project to result in long-term operational impacts to water quality (Appendix K). With adherence to Condition of Approval Nos. C-7, C-19, C-20, A-19, and A-20, the project would not violate water quality standards or substantially degrade surface water quality. Impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to the potential to violate any water quality standards, waste discharge requirements or otherwise substantially degrade surface water quality, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General

Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would result in a less than significant impact related to groundwater. Pursuant to the ISAGs, potential effects on groundwater are determined based on if a project would directly or indirectly decrease the net quantity of groundwater in a groundwater basin that is overdrafted or create an overdrafted groundwater basin (Impact 4.10-1); result in net groundwater extraction that results in overdrafting the groundwater basins or associated hydrologic units (Impact 4.10-2); or result in a net increase in groundwater extraction that would adversely affect the underlying groundwater basins (Impact 4.10-3). The 2040 General Plan EIR identified that several groundwater basins exist within the County. The Sustainable Groundwater Management Act (SGMA) provides a framework for sustainable management of groundwater supplies by local authorities, with the potential for State intervention, if necessary. SGMA requires the formation of local groundwater sustainability agencies (GSAs) for high-or medium-priority basins, which include critically overdrafted basins. For critically overdrafted high-or medium-priority basins, GSAs are required to create and adopt groundwater sustainability plans (GSPs). As defined in SGMA, a basin is subject to critical overdraft when continuation of present water management practices would probably result in significant adverse overdraft-related environmental, social, or economic impacts. Three overdrafted basins are present in the county, as identified by the California Department of Water Resources (DWR). These include the Cuyama Groundwater Basin, Pleasant Valley Groundwater Basin, and the Oxnard Plain Basin. Both Pleasant Valley Groundwater Basin and Oxnard Plain Basin are under the jurisdiction of the Fox Canyon Groundwater Management Agency. Several additional groundwater basins are present throughout the county, including the Ojai Valley Groundwater Basin, Simi Valley Groundwater Basin, and Piru Groundwater Basin. 2040 General Plan policies, such as Policy COS-2.10, which requires Ventura County to enhance groundwater management to prevent excessive pumping and reduce saltwater intrusion were identified to reduce impacts to ground water. The 2040 General Plan EIR concluded through compliance with GSPs and Ordinance 4468, which prohibits new wells for the extraction of groundwater in many groundwater basins, and 2040 General Plan policies, the 2040 General Plan would not result in impacts to groundwater. These impacts were concluded to be less than significant.

The project site lies within the Ventura River Valley Groundwater Basin, Lower Ventura River Subbasin (the Basin; DWR Basin No. 4-3.02).<sup>20</sup> The Basin is designated by DWR as Very Low Priority and is therefore not required to be managed under the SGMA. Ventura County Public Works Agency is responsible for the management of the Basin. The project would not involve the development or use of a groundwater well and would not directly result in groundwater extraction. Although the project would increase the amount of impervious surface on the project site compared to existing conditions, the project would continue to provide opportunities for groundwater recharge through three infiltration basins equipped with hydrodynamic separators, as well as within the conservation easement provided in the eastern portion of the project site. As a result, the project would not substantially decrease groundwater supplies or interfere with groundwater recharge in a manner that

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<sup>20</sup> Sustainable Groundwater Management Act (SGMA). 2025. SGMA Data Viewer. Available: <https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#boundaries>. Accessed October 2025.

would impede sustainable groundwater management of the basin. Impacts to groundwater resources would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to groundwater impacts, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- c. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
  - i. *Result in substantial erosion or siltation on-or off-site;*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would accommodate future development that could alter the existing drainage pattern, which could expose bare soil to rainfall and stormwater runoff and accelerate erosion and sedimentation or siltation, or add impervious surfaces that could promote increased erosion and sedimentation (Impact 4.10-12). However, as identified in the 2040 General Plan EIR, all future development under the 2040 General Plan would be required to comply with the Ventura Countywide Stormwater Quality Management Program (SQMP), meant to improve water quality and mitigate potential water quality impacts. Compliance with the SQMP would require the implementation of stormwater BMPs. Additionally, the 2040 General Plan incorporates comprehensive policies that require drainage studies and BMPs for future development projects. For instance, 2040 General Plan Policy PFS-6.1 requires that all discretionary development provides flood control and drainage facilities, as deemed necessary by the County Public Works Agency and Watershed Protection District, and that discretionary development projects fund improvements to existing flood control facilities necessitated by or required by the development. This impact was concluded to be less than significant.

In accordance with Ventura Countywide Municipal Stormwater NPDES Permit CAS004002, "Development Construction Program" Subpart 4.F, the project would be required to include BMPs designed to ensure compliance and implementation of an effective combination of erosion and sediment control measures during construction to protect surface water quality (Condition of Approval No. A-19). The project would also be subject to coverage under the NPDES Construction General Permit (No. CAS000002), which also requires implementation of BMPs during construction to minimize water quality impacts (Condition of Approval No. A-20). In addition, the project would be conditioned to prepare and submit a drainage plan and hydrologic and hydraulic calculations to the County's Land Development Services Division for review and approval (Condition of Approval No. C-20). The drainage plan would include BMPs to ensure that stormwater would be adequately retained and treated onsite, thereby minimizing the potential for erosion during project operation. Compliance with these regulations would reduce on-or offsite erosion or siltation that would occur as a result of the project during construction and operation. Therefore, the impact would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to erosion or siltation, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts,

as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- iii. *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;*  
or

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would accommodate future development that could alter the existing drainage pattern which could increase runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff (Impacts 4.10-12 and 4.10-15). However, as identified in the 2040 General Plan EIR, all future development under the 2040 General Plan would be required to comply with the Ventura Countywide SQMP, meant to improve water quality and mitigate potential water quality impacts. Compliance with the SQMP would require the implementation of stormwater BMPs. Also, the 2040 General Plan incorporates comprehensive policies that require drainage studies and BMPs for future development projects. As described in the ISAGs, any project that does not comply with the applicable requirements of the listed regulations, manuals and standards is considered to have a potentially significant impact. These regulations include the Ventura County Building Code, Ventura County Land Development Manual, and the Ventura County Subdivision Ordinance, among others. The 2040 General Plan EIR identified future development under the 2040 General Plan would be required to comply with all applicable federal, State, and local regulations, including County regulations related to drainage (Impact 4.10-16). These impacts were concluded to be less than significant.

As part of the project design, stormwater controls such as perimeter drainage features would be installed to help intercept and manage surface flows, reducing the potential for sediment or debris to enter nearby natural drainage areas. The project does not propose direct discharge into any jurisdictional waterway, and its stormwater management system would be designed to avoid impacts to downstream capacity or flood risk. To manage operational runoff, three detention basins are proposed in the western portion of the project site. The basins would temporarily store stormwater and release it at controlled rates that match pre-project conditions, thereby minimizing hydrologic changes. The project would be conditioned to prepare a post-construction stormwater management plan to retain/treat runoff from the new impervious surface, a maintenance plan, and annual verification of ongoing maintenance (Condition of Approval No. C-24). Therefore, the project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff and impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- ii. *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site;*
- iv. *Impede or redirect flood flows?*

The 2040 General Plan EIR identified that various areas of the county are mapped as areas susceptible to flood hazards, as established by Federal Emergency Management Agency (FEMA's) Ventura County Digital Flood Insurance Rate Maps (DFIRM) and the Ventura County Watershed Protection District (Impact 4.10-13). Inundation hazards in the county include inundation because of development location within a 100-year flood zone, as defined by FEMA, and dam failure inundation. Various dams, including 16 dams that constitute failure hazards exist throughout the county. The 2040 General Plan includes various policies to reduce potential impacts related to flooding. These include Policy HAZ-2.1, which limits development within these zones, and HAZ-2.8, which requires that Ventura County consider natural, or nature-based flood protection measures for discretionary development or County-initiated development, when feasible. To minimize loss of life, injury, property damage related to dam failure, the General Plan includes Policy HAZ-2.6, which requires the County to record a Notice of Dam Inundation Hazard with the County Recorder for new discretionary entitlements (including subdivisions and land use permits) within areas subject to flooding from a dam breach as identified by DWR's Dam Inundation Maps.

The 2040 General Plan EIR identified implementation of the 2040 General Plan could result in development that directly obstructs, diverts, or impedes the flow of water in a manner that could expose adjacent property or the community to increased risk of flood hazards (Impact 4.10-14). Further, the 2040 General Plan EIR identified that Ventura County has existing regulations, such as the Ventura County Flood Plain Management Ordinance 4521, the Ventura County Flood Control District Design Manual, and the Watershed Protection District Hydrology Manual 2006, that also address flood control and drainage facilities. Through compliance with existing regulations and implementation of General Plan policies, impacts were concluded to be less than significant. Therefore, impacts related to flooding hazards were concluded to be less than significant.

The project has the potential to generate additional runoff due to an increase in impervious area compared to existing conditions. However, the project would be conditioned to submit a drainage plan and hydrologic and hydraulic calculations prepared by a civil engineer to the County for review and approval (Condition of Approval No. C-20). The Post Construction Stormwater Management Plan prepared for the project identifies that the proposed infiltration basins would retain and treat stormwater consistent with the County's requirements, ensuring the project would not substantially increase the rate or amount of surface runoff or alter drainage patterns such that flood flows would be impeded or redirected (Appendix K). With compliance with state and County stormwater management requirements, including the Watershed Protection District Design Manual, Watershed Protection District Design Hydrology Manual, and the Ventura County Watershed Protection District Ordinance No. WP-2, the project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or offsite or impede or redirect flood flows. Impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to flooding hazards, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

The 2040 General Plan EIR identified that various areas of the county are mapped as areas susceptible to flood hazards, as identified by FEMA's Ventura County DFIRM and Ventura County Watershed Protection District (Impact 4.10-13). The 2040 General Plan EIR identified projects located within about 10 to 20 feet of vertical elevation from an enclosed body of water such as a lake or reservoir are considered more likely to be exposed to a seiche hazard (Impact 4.10-10). The 2040 General Plan EIR identified the tsunami hazard zone extends along the coastal portion of the county and for most portions of the north and south coastal areas, the tsunami hazard does not extend to areas more than 30 feet above sea level (Impact 4.10-11). The 2040 General Plan EIR identified that the SWRCB and the RWQCBs, through powers granted by the federal Clean Water Act, require specific permits for a variety of activities that have potential to discharge pollutants to waters of the State and adversely affect water quality. The NPDES program also regulates stormwater discharges from municipal separate storm sewer systems (MS4). The 2040 General Plan EIR concluded that all stormwater discharge conveyance from future development under the General Plan would be required to occur within MS4 systems and would not result in substantial risk of release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone (Impact 4.10-9). This impact was concluded to be less than significant.

The project site is not located within an Area of Special Flood Hazard, tsunami zone, or seiche zone.<sup>21</sup> The project would also not involve the use or storage of substantial quantities of hazardous materials. Therefore, the project would not risk release of pollutants due to project inundation and there would be no impact.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to flooding hazards, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*f. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The 2040 General Plan EIR stated that implementation of the 2040 General Plan would accommodate future development that could introduce pollutants into groundwater from both point and nonpoint sources during construction and operation. However, existing state and federal regulations—such as Waste Discharge Requirements, permits, and best management practices—are designed to prevent degradation of groundwater quality. Additional local ordinances and zoning codes also regulate groundwater protection through well management, sewage disposal planning, and spill prevention measures. With full compliance, future development under the 2040 General Plan is not expected to

<sup>21</sup> Federal Emergency Management Agency. 2025. FEMA Flood Map. Available: <https://msc.fema.gov/portal/search?AddressQuery=651%20E%20Main%20St%2C%20Ventura%20>. Accessed September 2025.

significantly impact groundwater quality or conflict with or obstruct implementation of a sustainable groundwater management plan (Impact 4.10-8). This impact was concluded to be less than significant. Additionally, as described above under *Impact 10.a.*, the 2040 General Plan EIR concluded that implementation of the General Plan would not obstruct implementation of a water quality control plan or otherwise substantially degrade surface water quality with compliance with existing stormwater regulations (Impact 4.10-4).

In general, project construction activities can affect surface and ground water quality due to the use of hazardous materials and/or the handling of contaminated soils. During construction, hazardous materials, such as fuels, oils, paints, solvents, and concrete additives, would be used and could impact surface and groundwater quality in the event of improper handling or spills. The project would be required to properly document, handle, and dispose of hazardous construction materials, as well as implement BMPs to prevent spills, as required the Countywide Municipal Stormwater NPDES Permit CAS004002 and NPDES Construction General Permit (Condition of Approval Nos. A-19 and A-20). During construction, the project would comply with all applicable federal, State, and local requirements concerning the handling, storage, transport, and disposal of hazardous materials. Compliance with the Construction General Permit and other applicable regulatory requirements would limit the potential for construction activities to result in surface and groundwater quality impacts. Consequently, construction of the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

The project does not include the installation or operation of water wells, OWTS, underground storage tanks, or a municipal supply well or spreading ground facility. Operational activities that could affect surface and groundwater quality include spills of hazardous materials. As discussed in Section 9, *Hazards and Hazardous Materials*, operation of the project would result in the use of minimal quantities of hazardous materials typically used in the maintenance of residential uses, such as paint, landscaping-related chemicals, and common cleaning products and household substances. Project operation is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Additionally, as described under *Impact 10b.*, operation of the project would not involve the extraction of groundwater or substantially reduce groundwater recharge. Therefore, operation of the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to a conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.



## **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

No mitigation measures were identified in the 2040 General Plan EIR. The following uniformly applied development policies and standards would be incorporated into the project:

- Ventura County Building Code
- NPDES Permit No. CAS000002, Order WQ 2022-0057-DWQ
- Ventura County's Stormwater Quality Management Ordinance

## **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

### **Condition of Approval Number A-19: Compliance with Stormwater Development Construction Program**

The construction of the project shall meet requirements contained in Part 4.F., “Development Construction Program”, of the Permit through the inclusion of an effective combination of construction best management practices (BMPs) during all ground disturbing activities.

### **Condition of Approval Number A-20: State Construction General Stormwater Permit No. CAS000002 Requirements**

Proper filing of all compliance documents required under the Construction General Permit.

### **Condition of Approval Number C-7: Landscaping and Screening**

The Permittee shall retain a landscape architect to prepare a landscape plan that complies with the requirements of this condition and the California Department of Water Resources Model Water Efficient Landscape Ordinance (MWELO).

### **Condition of Approval Number C-19: Grading Permit**

The Permittee shall submit a grading plan showing existing and proposed elevations to the Public Works Agency’s Land Development Services Division for review and approval. If a grading permit is required, a civil engineer registered in the State of California must prepare and submit the grading plans, geotechnical and hydrology reports as necessary, to Land Development Services Division for review and approval. The Permittee must post sufficient surety in order to ensure proper completion of the proposed grading.

### **Condition of Approval Number C-20: Drainage Plan**

The Permittee shall submit drainage plans and hydrologic and hydraulic calculations, which are prepared by a civil engineer registered in the State of California, to the Public Works Agency’s Land Development Services Division for review and approval.

### **Condition of Approval Number C-24: Collection and Loading Areas for Refuse and Recyclables and Organic Waste**

The Permittee shall adhere to the Ventura County Space Allocation Guidelines which include minimum space requirements for refuse, recycling, and organic waste bins and recommend aesthetic, gated, trash enclosures. Please review the Ventura County Space Allocation Guidelines at: <https://publicworks.venturacounty.gov/wsd/iwmd/businessrecycling/#SpaceAllocation>

# 11 Land Use, Planning, and Community Character

## Summary of Findings

With regard to Land Use and Planning, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. No mitigation measures were included within the 2040 General Plan EIR, and none would be required because project specific impacts would be less than significant.
5. No uniformly applied development policies or standards would be required to substantially mitigate impacts to land use and planning as project impacts would be less than significant. However, a condition of approval has been incorporated to further minimize potential impacts related to land use and planning.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>11. Land Use and Planning</b>						

Would the project:

a.	Introduce physical development that would physically divide an established community or is substantially incompatible with existing land uses, architectural form or style, site design/layout, or density/intensity within the established community in which the project is located?	GP EIR pp 4.11-18 to 4.11-22 Impact 4.11-1, Impact 4.11-2	No	No	No	No	N/A
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Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	GPEIR pp 4.11-22 to 4.11-24 pp. 4.11-18 to pp. 4.11-21 Impact 4.11-1 Impact 4.11-3	No	No	No	No	N/A

## Discussion

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

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not physically divide established communities or result in development that would be substantially incompatible with the existing land use within an established community (Impacts 4.11-1 and 4.11-2). The 2040 General Plan EIR identified that 2040 General Plan policies LU-1.1, LU-3.1, LU-17.4, CTM-5.5, and HAZ-6.7 would continue to promote orderly and compact development; identify existing urban residential, commercial, or industrial enclaves outside of incorporated areas and unincorporated urban centers within the Existing Community area designation; prohibit the introduction of new incompatible land uses into or abutting existing residential areas; prohibit discretionary development that would endanger the efficient, safe operation of an airport or would result in significant land use incompatibility impact with an airport; and condition discretionary development to minimize, to the maximum extent practical through site design or setbacks, the risk for exposure to railroad and trucking hazards. By promoting land use compatibility, the 2040 General Plan minimizes the potential for allowing future development or other physical changes that would physically divide an established community. The 2040 General Plan EIR concluded this impact to be less than significant.

The project site is located within an area zoned as open space and agricultural, specifically AE-40, and is not within the Existing Community area designation. The project site currently contains undeveloped open space, an orchard, and a single-family residence. Single-family residential uses and open space are located to the north, undeveloped open space to the east, and single-family and agricultural uses to the south. The project would develop residential uses on a portion of the site and reserve the eastern portion of the site as a conservation easement. The project would not introduce new roads, infrastructure, or other physical barriers that could physically divide an established community. Additionally, the project complies with the AE-40 zoning standards under the NCZO, including minimum lot size, building setbacks, and height limits, which ensure compatibility with surrounding residential, agricultural, and open space uses. By meeting these standards and

establishing a large conservation easement on the eastern portion of the site, the project would be compatible with adjacent land uses and would not physically divide an established community.

As previously discussed, the 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not physically divide established communities or result in substantial land use incompatibility. The project is located outside of an established community and would introduce residential uses that are compatible with surrounding land uses, and impacts would be less than significant. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- b. Would the project cause a significant environmental impact due to a conflict with a regional plan, policy, or program adopted for the purpose of avoiding or mitigating an environmental effect?*

The 2040 General Plan EIR determined that implementation of the 2040 General Plan would not conflict with applicable regional plans, policies, or programs, including the Regional Housing Needs Assessment (RHNA) and SCAG's 2016–2040 RTP/SCS (Impact 4.11-3). Through coordinated planning and compliance with relevant policies, the 2040 General Plan supports regional goals for housing, mobility, and land use. The 2040 General Plan's Circulation, Transportation, and Mobility Element promotes regional coordination with agencies such as Caltrans, SCAG, and the Ventura County Transportation Commission, and includes policies to support multimodal transportation and discourage projects with significant transportation impacts. The 2040 General Plan's Land Use and Community Character Element encourages efficient land use, infill development, and walkable neighborhoods, aligning with RTP/SCS objectives. Additionally, the 2040 General Plan incorporates policies consistent with the Ventura County Airport Comprehensive Land Use Plan to ensure land use compatibility around airports, protect navigable airspace, and minimize risks associated with aircraft operations. Overall, the 2040 General Plan EIR concluded that these policies and programs ensure consistency with regional planning efforts, and the impact would be less than significant.

The project's consistency with policies that protect specific environmental resources, such as aesthetic resources (including scenic policies in the North Ventura Area Plan), air quality, biological resources, cultural resources, energy, GHG emissions, and transportation are addressed in their respective sections of this document. As described throughout this document, the project would comply with applicable 2040 General Plan EIR mitigation measures, standard conditions of approval, and uniformly applied policies and standards to minimize impacts to the environment. No conflicts with environmental policies that are specific to individual topics have been identified throughout this document. The project would comply with North Ventura Area Plan Implementation Program B (County/City Coordination), which requires discretionary projects to meet County and City development standards (if there is a difference in the standards between the two jurisdictions, the more stringent of the two standards would apply). As required by Program B, facilities such as streets, bikeways, secondary drainage facilities, and water systems should conform to the City of Ventura's standards (Condition of Approval Nos. A-18 and B-9). In addition, as described in Table 6, the project would not conflict with applicable land use policies established by the 2040 General Plan. Therefore, the project would not cause a significant environmental impact due to a conflict with a regional plan, policy, or program adopted for the purpose of avoiding or mitigating an environmental effect.

**Table 6 Consistency with Applicable 2040 General Plan Policies**

Policy	Project Consistency
<p><b>Policy LU-1.3 Regional Housing Needs Allocations.</b> The County shall coordinate with Southern California Association of Governments (SCAG) to direct state regional housing needs allocations predominantly to cities to ensure consistency with the County's Save Open Space &amp; Agricultural Resources (SOAR) initiative and the SCAG's Sustainable Communities Strategy.</p>	<p><b>No conflict.</b> The project would increase affordable housing for farmworkers within unincorporated Ventura County, consistent with SOAR initiative that specifically allows farmworker housing as a permitted use on agricultural sites such as the project site.</p>
<p><b>Policy LU-6.1. Agricultural Buffers.</b> The County shall require non-agricultural land uses adjacent to agricultural uses to incorporate adequate buffers.</p>	<p><b>No conflict.</b> The project site is adjacent to agricultural uses to the south. The project would include a 63-acre conservation parcel (Parcel 4) that would remain undeveloped, providing a natural buffer in this portion of the project site. The project would provide vegetative screening along the southern boundary of the development area to minimize potential conflicts with agricultural operations located to the south of the site. The project would also implement Condition of Approval No. C-29 (Notification and Response Plan) to address potential conflicts related to agricultural activities. Therefore, the site layout and landscaping plan and Conditions of Approval are designed to minimize conflicts with surrounding agricultural operations, supporting the County's requirement for adequate buffers between non-agricultural and agricultural land uses.</p>
<p><b>Policy LU-8.5 Farmworker Housing.</b> The County shall support the development of safe and quality farmworker housing that facilitates a reliable labor force and promotes efficient agricultural operations. Housing units shall include a variety of housing types, including group quarters and larger dwelling units that can accommodate a family.</p>	<p><b>No conflict.</b> The project involves construction of a 100 percent affordable, 328-unit farmworker housing complex restricted to farmworkers who qualify as lower income.</p>
<p><b>Policy LU-9.5. Recreational Areas Appropriate for the Open Space Land Use Designation.</b> The County shall designate areas appropriate for recreational activities as Open Space, including, but not limited to, use and enjoyment of recreational trails and areas for hunting and fishing. Preservation of open space also serves to protect areas of outstanding scenic, historic, and cultural value; areas particularly suited for park and recreation purposes, including access to lakeshores, beaches, and rivers and streams; and areas which serve as links between major recreation and open space reservations, including utility easements, banks of rivers and streams, trails, and scenic highway corridors.</p>	<p><b>No conflict.</b> The proposed 63-acre conservation parcel (Parcel 4) would remain undeveloped and preserved as open space, supporting recreational and ecological functions.</p>
<p><b>Policy LU-10.2. Density Exceptions Residential Land Use Designation.</b> The County shall exclude from the Residential land use maximum density farmworker dwellings, and accessory dwelling units pursuant to section 65852.2 of the Government Code.</p>	<p><b>No conflict.</b> The proposed farmworker housing development would be exempt from the residential land use maximum density under Government Code Section 65852.2, as the project would be designed specifically to serve lower-income farmworkers.</p>
<p><b>Policy LU-16.8. Residential Design that Complements the Natural Environment.</b> The County shall encourage discretionary development that incorporates design features that provide a harmonious relationship between adjoining uses and the natural environment.</p>	<p><b>No conflict.</b> The project would be designed in a modern Spanish Colonial style and include amenities such as community centers and recreational space, which would complement the surrounding land uses.</p>

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to a conflict with a regional plan, policy, or program, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

No mitigation measures were identified in the 2040 General Plan EIR. Additionally, no uniformly applied development policies or standards are applicable to land use.

### **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

#### **Condition of Approval Number A-2: Required Project Improvements for VTPM and PD**

The Permittee shall ensure that all required off-site and on-site improvements for the project, including structures, paving, parking, and landscaping are completed in conformance with the approved plans stamped as hearing Exhibit Nos. 3 and 4. The Permittee shall prepare and submit all final building and site plans for the County's review and approval in accordance with the approved plans.

#### **Condition of Approval Number A-18: Road Improvements**

Road improvements are required in accordance with the Ventura County North Ventura Avenue Area Plan, County of Ventura Public Works Agency Road Standards, the City of Ventura Road Standard Details, 2040 General Plan Circulation, Transportation and Mobility Element Policies CTM Policies 1.1, 1.2, 1.3, 1.4, 1.5, 1.6 and 1.7, the "Paveout Policy" dated January 16, 1968; and Code of Ordinances Division 8, Chapter 4 – Urban Area Development. Ventura Avenue has an existing variable road width. The minimum required road width is 68 feet, curb face to curb face per City of Ventura Standard Detail No. 105 for a Secondary Arterial Street. Construct road improvements including, without limitation, roadway widening, curb and gutter, 10-foot-wide sidewalk, street trees, and street tree wells along the parcel's frontage in accordance with City Standard Detail No. 105 for a Secondary Arterial Street.

Floral Drive is a public street required by the City of Ventura in the North Ventura Avenue Plan. The minimum required road width is, according to the City of Ventura, to be 46 feet from curb face to curb face per City of Ventura Standard Detail No. 105 for a Collector Street modified to have 46 feet of paved width, curb face to curb face, and a five-foot wide parkway with 5-foot wide sidewalk on the west side of Floral Drive. Construct road improvements in accordance with City requirements including, without limitation, a 43-foot wide roadway, curb and gutter, 5-foot wide sidewalk on the west side of Floral Drive with 5-foot parkway, and street trees in accordance with the City's modified Standard Detail 105 for a Commercial Street. The transition from the existing 60-foot wide right-of-way Floral Drive improvements in the adjacent tract northerly of the project to the 56-foot wide proposed Floral Drive improvements must be in accordance with City of Ventura standards and requirements.

Submit road improvement plans prepared by a Registered Civil Engineer to the Public Works Agency – Transportation Department and the City of Ventura Public Works, Land Development Section for review and approval. Enter into an agreement with the County to complete the road improvements. Submit the agreement to the Public Works Agency – Transportation Department for review and approval. Post sufficient surety guaranteeing the construction of the road improvements. Submit proof to the Public Works Agency – Transportation Department that the surety has been posted.

**Condition of Approval Number B-9: Dedication of Right-of-Way**

North Ventura Avenue has an existing right-of-way width of 84 feet. The minimum required right-of-way width is based on the City of Ventura's current Road Standard Details and is 88 feet per City of Ventura Road Secondary Arterial Standard Detail 105. Right-of-way is required in accordance with the Ventura County North Ventura Avenue Area Plan; Ordinance 1607 dated November 10, 1964; the "Paveout Policy" dated January 16, 1968; and Code of Ordinances Division 8, Chapter 4 – Urban Area Development.

- a. Dedicate  $(88 \text{ feet} - 84 \text{ feet})/2 = 2'$  of right-of-way (half of minimum street right-of-way required) along the parcel's frontage on Ventura Avenue in accordance with City of Ventura Road Standard Detail No. 105 for a Secondary Arterial.
- b. Dedicate an irrevocable 56 feet of right-of-way on Floral Drive in accordance with the City of Ventura's requirements in an alignment acceptable to the City of Ventura. This irrevocable dedication will be rejected by the County until such time that the roadway is annexed into the City.

**Condition of Approval Number C-29: Notification and Response Plan**

Prior to the use inauguration of the requested Zoning Clearance, the Permittee is required to prepare a Notification and Response Plan, subject to approval by Ventura County Department of Agriculture/Weights & Measures (AWM). Any proposed changes to the Notification and Response Plan must be submitted to AWM for approval. The Notification and Response Plan must indicate how associated persons are to be notified that normal farming operations may cause nuisances such as dust or noise, and that the use of fertilizers and/or chemical pest controls may occur in the vicinity. The Notification and Response Plan must indicate how associated persons will be instructed to respond in the rare event that adjacent agricultural operations present a hazard to said persons. The Permittee is recommended to contact adjacent growers to exchange information about agricultural operations that may be scheduled and make this information available to associated persons.

# 12 Mineral and Petroleum Resources

## Summary of Findings

With regard to Mineral and Petroleum Resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. No mitigation measure contained within the 2040 General Plan EIR would be applicable.
5. No uniformly applied development policies or standards or conditions of approval would be required to minimize potential impacts to mineral and petroleum resources.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>12. Mineral and Petroleum Resources</b>						
Would the project:						
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	GP EIR pp. 4.12-9 to pp. 4.12-22 Impact 4.12-1, Impact 4.12-2, Impact 4.12-3	No	No	No	No	N/A
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	GP EIR pp. 4.12-10 to pp. 4.12-11; pp. 4.12-22 to pp. 4.12-32 Impact 4.12-2 Impact 4.12-4	No	No	No	No	N/A

## Discussion

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*
- Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

Mineral Resources are defined as naturally occurring inorganic materials in the earth's crust that are of economic value and can be extracted. Mineral resources in Ventura County consist primarily of



aggregate resources, more commonly known as construction grade sand, gravel, and stone. Other mineral resources within the County include petroleum, clay, shale, gypsum, silica sand, limestone, and phosphate.<sup>22</sup> The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not result in the potential for development on or adjacent to mineral resources that are zoned, mapped, or permitted for extraction, which could hamper or preclude extraction of the resources; this impact was identified as less than significant (Impact 4.12-1). The 2040 General Plan EIR concluded that implementation of the General Plan would not result in the loss of a known mineral resource (Impact 4.12-2); this impact was identified as less than significant. The 2040 General Plan EIR identified that implementation of the General Plan could potentially affect or limit petroleum extraction and resources, but that impacts would be mitigated to a less than significant level with Mitigation Measures PR-1 through PR-3 (Impacts 4.12-3 and 4.12-4). Overall, impacts to mineral resources were determined to be less than significant or less than significant with mitigation (for petroleum resources, specifically).

The project site is located within Mineral Resource Zone 4 (MRZ-4), an area where available geologic information is inadequate to assign to any other mineral resource zone category.<sup>23</sup> The project site does not contain any existing mines, nor are there any mines located within the vicinity of the project site. According to the California Department of Conservation's Well Finder GIS, the southern portion of the project site is located within the Ventura oil and gas field<sup>24</sup>; however, County GIS data indicates the oil field boundary begins approximately 1,000 feet south of Parcel 4's southernmost point. Regardless of this mapping discrepancy, no oil wells are located on the project site or adjacent properties, or within 0.25 mile of the project site (Appendix H). The project would not result in development that could hamper or preclude extraction of resources. Therefore, the project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. There would be no impacts related to mineral resources.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

Mitigation measures identified in the 2040 General Plan EIR are not applicable to the project. Additionally, no uniformly applied development policies or standards for mineral and petroleum resources are applicable to the project.

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<sup>22</sup> Ventura County. 2020. 2040 General Plan. Available: <https://rmdocs.venturacounty.gov/planning/programs/general-plan/publications/ventura-county-2040-general-plan.pdf>. Accessed March 2025.

<sup>23</sup> California Department of Conservation. 2002. SMARA Mineral Land Classification. Available: [https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR\\_253-MLC-WesternVenturaCountySimiPCR-2022-Plate01-MRZs-a11y.pdf](https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_253-MLC-WesternVenturaCountySimiPCR-2022-Plate01-MRZs-a11y.pdf). Accessed March 2025.

<sup>24</sup> Department of Conservation. 2025. Well Finder. Available: <https://maps.conservation.ca.gov/doggr/wellfinder/>. Accessed November 2025.

### **Conditions of Approval and Impact Minimization Measures**

The project would not incorporate the conditions of approval and impact minimization measures related to mineral and petroleum resources.

# 13 Noise and Vibration

## Summary of Findings

With regard to Noise and Vibration, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. No mitigation measures contained within the 2040 General Plan EIR would be required because project specific impacts would be less than significant.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts related to noise.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>13. Noise and Vibration</b>						
Would the project:						
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	GP EIR pp.4.13-11 to 4.13-24 Impact 4.13-1, Impact 4.13-3, Impact 4.13-4	No	No	No	No	Yes
b. Generation of excessive groundborne vibration or groundborne noise levels?	GP EIR pp. 4.13-25 to 4.13-29 Impact 4.13-6, Impact 4.13-7	No	No	No	No	N/A

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	GP EIR pp. 4.13-24 Impact 4.13-5	No	No	No	No	N/A

## Discussion

- a. *Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would result in less than significant impacts related to temporary construction noise due to required compliance with County noise standards (Impact 4.13-1). The 2040 General Plan EIR identified that sensitive land uses within 6,033 feet, 6,356 feet, and 11,030 feet of heavy-duty construction equipment could exceed the daytime, evening, and nighttime exterior construction noise thresholds established by the adopted Construction Noise Threshold Criteria and Control Plan. However, future development under the 2040 General Plan must comply with construction noise control measures identified in the Construction Noise Threshold Criteria and Control Plan, which would substantially lessen construction noise levels. This impact was identified as less than significant in the 2040 General Plan EIR.

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would result in traffic-related noise increases at existing sensitive receptors (Impact 4.13-3). The 2040 General Plan EIR identified the potentially significant impact of permanent increases to existing ambient levels due to traffic noise. Specifically, traffic volume increases could result in noise levels exceeding the County's standard of 60 A-weighted decibels (dBA) community noise equivalent level (CNEL)<sup>25</sup> for outdoor noise levels at existing noise-sensitive uses along roadways. Further, buildout of the 2040 General Plan could result in a substantial increase of 3 dBA or greater at locations currently exceeding the County's traffic noise standards. 2040 General Plan Policies HAZ-9.3, HAZ-9.4, and HAZ-9.5 would require noise-generating development to be evaluated and implementation of noise control measures to reduce noise levels to acceptable levels. However, it is uncertain if the recommended noise control measures would be sufficient to reduce noise levels generated by future development to acceptable levels for all future types of development in all locations and circumstances. This impact

<sup>25</sup> CNEL is used for long-term operational noise analysis because it accounts for day, evening, and nighttime periods.

was identified as potentially significant in the 2040 General Plan EIR. With implementation of Mitigation Measure NOI-1, the 2040 General Plan would require discretionary development to implement noise reduction measures to reduce project-generated traffic noise. In many cases, noise reduction measures would reduce traffic noise levels generated by a discretionary development at existing noise-sensitive receptors to less than significant levels. However, there may be cases where noise reduction measures are either infeasible or inadequate for reducing traffic noise to less than significant levels, and thus, discretionary development could result in a substantial noise level increase that would exceed County standards at existing noise-sensitive receptors. This impact was identified as significant and unavoidable.

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would result in less than significant impacts related to permanent stationary operational noise due to required compliance with County noise standards and mitigation measures (Impact 4.13-4). The 2040 General Plan EIR evaluated the potential for operational stationary noise sources to generate levels that exceed applicable standards. 2040 General Plan Policies HAZ-9.1, HAZ-9.2 and HAZ-9.5 require future developments under the 2040 General Plan to adhere to County's adopted noise standards and prohibit a 3 dBA or greater increase to the existing ambient noise environment. This impact was identified as less than significant in the 2040 General Plan EIR.

Based on the Noise and Vibration Study prepared for the project by Rincon in September 2025, construction activities would generate maximum noise levels of 38 dBA Leq<sup>26</sup> (hourly average noise level) at the nearest sensitive receptor, which is below the County's daytime construction noise threshold of 55 dBA Leq (Appendix L). Construction activities would also comply with the County's permitted hours (Condition of Approval No. A-14). Therefore, construction-related noise impacts would be less than significant.

The Noise and Vibration Study also assessed the potential for the project to result in significant operational noise at nearby sensitive receptors. Operational stationary noise sources, such as HVAC units, would be anticipated to produce noise levels of approximately 34 dBA Leq at the nearest off-site sensitive receptor, which is well below the County's nighttime threshold of 45 dBA Leq. Additionally, the project is not expected to generate significant traffic volumes during construction or operation that would adversely affect ambient noise levels on local roadways. Project operation would result in a maximum increase of traffic noise of 2.7 dBA, which does not exceed the 3 dBA threshold (Appendix L). Therefore, operational noise impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR identified significant and unavoidable impacts related to traffic noise and less than significant impacts related to construction and operational stationary noise. The project would not result in significant construction or operational noise impacts, as described in the Noise and Vibration Study (Appendix L). Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*b. Generation of excessive groundborne vibration or groundborne noise levels?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in temporary groundborne vibration during construction activities, particularly from heavy equipment or pile driving, and concluded impacts would be significant and unavoidable (Impact 4.13-6). The 2040

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<sup>26</sup> Leq is a metric for construction noise as construction occurs intermittently during daytime hours and does not generate continuous 24-hour noise.

General Plan EIR evaluated the potential for construction activities to generate excess groundborne vibration and identified that damage to older buildings can occur at 0.25 inch per second of peak particle velocity (PPV) and 0.5 for conventional buildings. This impact was identified as potentially significant. Mitigation Measure NOI-3 establishes requirements for noise and vibration-reducing techniques during construction. The 2040 General Plan EIR identified that implementation of Mitigation Measure NOI-3 could potentially reduce the construction vibration impact to a less-than-significant level at noise-sensitive land uses. However, it was not possible to conclude that vibration levels in all locations associated with all future development under the 2040 General Plan would be reduced below significance thresholds; therefore, this impact was considered significant and unavoidable.

Project construction activities such as grading and paving were analyzed using Federal Transit Administration (FTA) vibration criteria. Based on the Noise and Vibration Study, the most vibration-intensive equipment anticipated to be used during construction are vibratory rollers that would generate a peak particle velocity (PPV) of approximately 0.056 in/sec at the nearest off-site residential structure, located 60 feet from the project boundary (Appendix L). This is well below the FTA's recommended threshold of 0.2 in/sec PPV for nonengineered timber and masonry buildings, which applies to nearby residences. No pile driving or blasting is proposed, and operational activities would not include any substantial vibration sources. Therefore, the project would result in less than significant impacts related to vibration.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact related to construction-generated groundborne vibration. The project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not result in significant impacts related to airport or airstrip noise exposure because the 2040 General Plan does not propose new development within areas subject to excessive airport noise, and existing policies and regulations would continue to apply (Impact 4.13-5). The 2040 General Plan EIR identified that compliance with the Ventura County Comprehensive Land Use Plan for the four airports within Ventura County effectively reduces potential aircraft noise impacts. The 2040 General Plan EIR identified that there are no residential land uses within the 60 CNEL noise contour of any public or private airfields and thus there would be no impact.

The project site is located outside of the noise contours of the Santa Paula Airport, Oxnard Airport, and Camarillo Airport, the closest airports to the project site. Therefore, the project would not expose construction workers or future residents to excessive noise levels related to airports, and there would be no impact.

As previously discussed, the 2040 General Plan EIR identified no impact related to airport noise due to the absence of residential land uses within the 60 CNEL noise contour of any public or private airfields. The project site is located outside of the noise contours of the nearest airports and would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or

increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

Mitigation measures identified in the 2040 General Plan EIR are not applicable to the project. The following uniformly applied development policies or standards applicable for noise would be incorporated into the project:

- **2040 General Plan Policy HAZ-9.2: Noise Compatibility Standards.** The County shall review discretionary development for noise compatibility with surrounding uses. The County shall determine noise based on the following standards:
  1. New noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed CNEL 60 or Leq1H of 65 dB(A) during any hour.
  2. New noise sensitive uses proposed to be located near railroads shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed L10 of 60 dB(A)
  3. New noise sensitive uses proposed to be located near airports:
    - i. Shall be prohibited if they are in a Community Noise Equivalent Level (CNEL) 65 dB or greater, noise contour; or
    - ii. Shall be permitted in the Community Noise Equivalent Level (CNEL) 60 dB to CNEL 65 dB noise contour area only if means will be taken to ensure interior noise levels of CNEL 45 dB or less.
  4. New noise generators, proposed to be located near any noise sensitive use, shall incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor, measured at the exterior wall of the building, does not exceed any of the following standards:
    - i. Leq1H of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.;
    - ii. Leq1H of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.; and
    - iii. Leq1H of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m.
  5. Construction noise and vibration shall be evaluated and, if necessary, mitigated in accordance with the Construction Noise Threshold Criteria and Control Plan (Advanced Engineering Acoustics, November 2005).

### **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

**Condition of Approval Number A-14: Construction Noise**

The Permittee shall limit grading and construction activity for site preparation and development to the hours between 7:00 a.m. and 7:00 p.m., Monday through Friday, and from 9:00 a.m. to 7:00 p.m. Saturday, Sunday, and State holidays. Construction equipment maintenance shall be limited to the same hours. Non-noise generating construction activities such as interior painting are not subject to these restrictions.



# 14 Population and Housing

## Summary of Findings

With regard to Population and Housing, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. No mitigation measures were included within the 2040 General Plan EIR, and none would be required because project specific impacts would be less than significant..
5. No uniformly applied development policies or standards would be required to mitigate impacts related to population and housing, as project impacts would be less than significant. However, uniformly applied development policies or standards and conditions of approval would be incorporated to further reduce impacts related to population and housing.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>14. Population and Housing</b>						
Would the project:						
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	GP EIR pp. 4.14-8 to pp. 4.14-9 Impact 4.14-2	No	No	No	No	N/A
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	GP EIR pp. 4.14-5 to pp. 4.14-8, pp. 4.14-9 to pp. 4.14-10 Impact 4.14-1, Impact 4.14-3	No	No	No	No	N/A

## Discussion

- a. *Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not induce substantial unplanned population growth beyond projections prepared by SCAG (Impact 4.14-2); this impact was identified as less than significant. The policies and programs within the 2040 General Plan do not promote unplanned growth but would rather direct where and how projected growth within the unincorporated county is expected to occur. 2040 General Plan Policies LU-1.1, LU-1.6, and LU-1.3 are focused on managing and planning for the location of projected future growth within the county and maximizing efficient development patterns. Therefore, impacts of the 2040 General Plan were determined to be less than significant.

The project would be a 100 percent affordable, 328-unit farmworker housing complex restricted to farmworkers who qualify as lower income. The project would also include an approximately 63-acre conservation parcel (Parcel 4) that would remain open space and agricultural uses. The project would result in approximately 902 additional residents based on the DOF estimate of persons per household for unincorporated Ventura County. This would fall within the 7,600 additional residents in unincorporated Ventura County anticipated between 2019 and 2045 (Appendix A). Furthermore, the project would comply with Section 8107-41 of the NCZO (Condition of Approval No. C-16), to ensure that residents of the project meet the criteria for Agricultural Worker Housing, which included farmworker housing complexes. This Condition of Approval requires that residents of the project are farmworkers who are principally employed within the Ventura County. Future residents of the project would be those already working in Ventura County and may already live within the County. As such, the project would result in less than significant direct impacts related to substantial unplanned population growth.

Additionally, the project would require employees for maintenance and operation of the housing complex, and would generate new permanent jobs that could indirectly increase the population. The project is estimated to require up to 20 full-time employees (assumed from the size of community centers and maintenance buildings). This would fall well within the 5,400-employee growth projected in unincorporated Ventura County between 2019 and 2045 (Appendix A). Furthermore, these positions are likely to be filled by current residents of the county or nearby areas, thus eliminating the need for additional housing units within the county. As such, the project would result in less than significant indirect impacts related to substantial unplanned population growth due to new employment. Ventura County has anticipated the construction of a farmworker housing development in the analysis contained in the 2040 General Plan EIR, and the project would not result in residential or employment growth that exceeds the SCAG projections for unincorporated Ventura County. Therefore, project impacts related to population growth would be less than significant.

As previously discussed, the 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not induce substantial unplanned population growth beyond SCAG projections, and impacts were determined to be less than significant. The project would result in population and employment growth that falls within the SCAG projections for unincorporated Ventura County and impacts would be less than significant. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not displace substantial numbers of existing people or housing (Impact 4.14-1); this impact was identified as less than significant. Policies and programs in the 2040 General Plan and compliance with applicable regulations would ensure that future development could be accommodated within plan areas. While housing could be displaced through development of areas near existing communities, these areas would either continue to be under residential land use designations or would add new residential areas within the plan area such that a net gain in residential capacity would be achieved. The county would additionally continue to engage with SCAG through each RHNA planning cycle to ensure adequate land is available to meet its RHNA obligations. Impacts related to the displacement of people and housing were concluded to be less than significant.

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not result in low-income employment opportunities that could generate demand for new housing (Impact 4.14-3). Several 2040 General Plan Policies, such as Policies EV-1.3, LU-4.5, and LU-1.6, state that the County would continue to implement practices and programs to reduce the cost of housing, evaluate employment generating discretionary development to assess the project's impact on lower-income housing demand, and designate adequate land for urban development. Implementation of the General Plan Policies would ensure adequate low-income housing for projected increases in low-income employment opportunities through the planning horizon. This impact was concluded to be less than significant.

The project site contains a single-family residence, which would be demolished to accommodate the proposed residential units. This would not represent a displacement of a substantial number of housing units or people. Additionally, the project would increase the amount of housing available on the project site, and no additional offsite housing would need to be constructed as a result of the displacement of people or housing. Therefore, the project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere and impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to the displacement of substantial numbers of existing people or housing, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

No mitigation measures were identified in the 2040 General Plan EIR for population and housing. The project would be consistent with the following uniformly applied development policies or standards that are applicable for population and housing:

- **NCZO Section 8107-41.1:** Under Section 65580(a) of the Government Code, the Legislature has declared that the availability of housing, including farmworker housing, is of vital statewide importance. The purpose of this section is to promote the development of, and to establish development standards for, agricultural worker housing, which is available to: farmworkers and

animal caretakers who are employed on a full-time, full-time seasonal, temporary or part-time basis; and their families. Agricultural worker housing includes:

- a. Farmworker and Animal Caretaker Dwelling Units;
- b. Farmworker Housing Complexes;
- c. Farmworker Group Quarters pursuant to Section 8107-41.3.4; and
- d. Temporary trailers for seasonal and temporary farmworkers and animal caretakers pursuant to Section 8107-41.3.5.

### **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following condition of approval and impact minimization measures to further minimize impacts:

#### **Condition of Approval Number C-16: Employment Criteria within a Farmworker Housing Complex**

The Permittee shall ensure that dwelling units and sleeping quarters in the Farmworker Housing Complex shall only be occupied by persons who are principally employed within the County of Ventura for activities associated with crop and orchard production, and all uses listed thereunder, as set forth in Section 8105-4 of the NCZO. A qualified farmworker who has been renting a dwelling unit in a Farmworker Housing Complex and who subsequently retires or becomes disabled, may continue to reside in the dwelling unit. Members of the farmworker's household, if any, may also occupy said dwelling unit. The Permittee must submit all County-required verification fees and an annual verification report each year to the Planning Director, in a form acceptable to the Planning Director, verifying that all the dwelling units or sleeping quarters are being rented to, and occupied by, persons who meet the farmworker employment criteria.

# 15 Public Services

## Summary of Findings

With regard to Public Services, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. No mitigation measures contained within the 2040 General Plan EIR would be required because project specific impacts would be less than significant.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts related to public services.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>15. Public Services</b>						

Would the project:

- a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

1. Fire Protection?	GPEIR pp.4.15-11 to pp.4.15-12 Impact 4.15-3	No	No	No	No	Yes
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Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
2. Police Protection?	GPEIR pp.4.15-8 to pp.4.15-11 Impact 4.15-1, Impact 4.15-2	No	No	No	No	N/A
3. Schools?	GPEIR p.4.15-5 Impact: was dismissed	No	No	No	No	N/A
4. Parks?	GP EIR pp 4.15-14 to 4.15-15 Impact 4.15-5	No	No	No	No	N/A
5. Other public facilities?	GP EIR pp 4.15-14 to 4.15-15 Impact 4.15-4	No	No	No	No	N/A

## Discussion

a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

i. *Fire Protection?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in the expansion or construction of new fire protection facilities (Impact 4.15-3). Future development could be located in excess of 5 miles from a full-time paid fire department or result in response times in excess of 12 minutes. This would potentially require the need for new or expanded fire protection facilities in order to maintain adequate service ratios and other performance standards. The construction of new facilities could result in physical environmental impacts. The 2040 General Plan EIR concluded that future development would be subject to applicable laws and regulations, policies and implementation programs of the 2040 General Plan, and mitigation measures identified in the 2040 General Plan EIR. The adverse physical impacts associated with construction of new or expanded fire protection facilities would be consistent with the impacts of the types of development evaluated in the 2040 General Plan EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases, mitigation measures would not reduce impacts. Because not all potentially significant impacts can be reduced, the impact related to the construction of new or expanded fire protection facilities was concluded to be significant and unavoidable.

The Ventura County Fire Department (VCFD) serves the County of Ventura. The County has 34 fire stations, with the nearest being Station 23 located at 15 Kunkle Street approximately 4.19 miles north of the project site.<sup>27</sup> The project involves the development of a 328-unit affordable farmworker housing complex and associated infrastructure that may exacerbate fire risk. The development would increase the population near agricultural and open space lands, which may increase fire risk. Applicable codes and standards, including the California Fire Code, would address potential fire hazards related to development of the project. The project would include design measures developed in coordination with VCFD to prevent or limit fire incidents. Fire risks associated with the project would be minimized through design measures aimed at reducing hazardous fuel loads, utilizing fire-resistant building materials, installing fire protection systems, and providing a fire protection plan (Condition of Approval Nos. B-14, C-40-C-43, and C-48-C-52). To support emergency response, the project would install fire hydrants capable of meeting required fire flow and duration (Condition of Approval Nos. C-40 and C-41), be equipped with an alarm system, including lights and sirens that would be activated in the event of a fire to warn people within the project site to evacuate the area (Condition of Approval No. C-43), and provide site access and circulation that complies with VCFD fire access requirements (Condition of Approval Nos. C-30-C-33 and C-36-C-38). The project would maintain emergency access and public safety throughout phased construction (Condition of Approval No. C-53). As further discussed in Section 20, *Wildfire*, the project design is intended to reduce the risk associated with fire and facilitate emergency access and response. Additionally, as discussed in Section 14, *Population and Housing*, the project would not result in substantial unplanned population growth that could increase demands on VCFD. Therefore, impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR identified significant and unavoidable impacts related to fire protection services. However, the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

ii. *Police Protection?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in the provision of new or expanded law enforcement and emergency services as a result of inadequate security measures (Impact 4.15-1). This impact was identified as less than significant with implementation of Mitigation Measure PS-1, which requires Ventura County to implement a program to review future projects for incorporation of law enforcement security measures. According to the ISAGs, land use types that require security measures include most urban land uses, including Residential, Mixed Use, Commercial, and Industrial land uses.<sup>28</sup> The 2040 General Plan does not directly require the provision of security measures associated with discretionary projects. However, with implementation of Mitigation Measure PS-1, the County Sheriff's Department would review future discretionary projects to determine whether the project includes adequate security measures and access. Impacts were concluded to be less than significant.

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in the construction of new or expanded law enforcement and emergency services facilities (Impact 4.15-2). General Plan Policy PFS-11.1 requires that Ventura County provide adequate law enforcement and

<sup>27</sup> Ventura County Fire Department. 2025. Fire Stations. Available: <https://vcfd.org/station-23/>. Accessed March 2025.

<sup>28</sup> Ventura County Initial Study Assessment Guidelines. 2011. Available: [https://docs.vcrma.org/images/pdf/planning/ceqa/current\\_ISAG.pdf](https://docs.vcrma.org/images/pdf/planning/ceqa/current_ISAG.pdf). Accessed March 2025.

emergency services to County residents. Future development could result in the need for construction of new or expanded law enforcement and emergency response facilities in order to maintain adequate service ratios and other performance standards. The construction of new facilities could result in physical environmental impacts. The 2040 General Plan EIR concluded that future development would be subject to applicable laws and regulations, the policies and implementation programs of the 2040 General Plan, and mitigation measures identified in the 2040 General Plan EIR. The adverse physical impacts associated with construction of new or expanded law enforcement and emergency services facilities would be consistent with the impacts of the types of development evaluated in the 2040 General Plan EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases, mitigation measures would not reduce impacts. Because not all potentially significant impacts can be reduced, the 2040 General Plan EIR concluded that the impact of constructing new or expanded law enforcement and emergency services facilities would be significant and unavoidable.

The project site would be served by the Ventura County Sheriff's Department with the nearest police station located at 800 South Victoria Avenue approximately 6.4 miles southeast of the project site.<sup>29</sup> The project has been reviewed for consistency with law enforcement security measures and it has been determined that adequate security measures have been incorporated into the project. Security measures would include security and safety lighting, secured building entrances, window locks, security cameras, and adequate site access for emergency service providers. Additionally, as discussed in Section 14, *Population and Housing*, the project would not result in substantial unplanned population growth that could increase demands on law enforcement services. The project would not result in the need for new or expanded law enforcement and emergency services facilities and impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR identified significant and unavoidable impacts related to police protection services. However, the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### *iii. Schools?*

The 2040 General Plan EIR identified that the ISAGs threshold criterion for Education-Schools addresses potential project interference with operations of an existing school. The 2040 General Plan provides for orderly growth and future development, which would be concentrated within the Existing Community area designation (boundary) and Urban area designation (boundary). Programmatic land use planning under the General Plan was determined to reduce the potential for interference with school operations. With respect to school enrollment, the ISAGs state that the development fees authorized by Senate Bill 50 are deemed to be "full and complete school facilities mitigation" pursuant to Section 65996 of the California Government Code. Therefore, the 2040 General Plan EIR did not provide a detailed assessment of impacts to school facilities, and concluded that impacts related to school facilities would be less than significant with the payment of development fees pursuant to Section 65996 of the California Government Code.

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<sup>29</sup> Ventura County. 2025. Ventura County Sheriff's Office. Available: <https://sheriff.venturacounty.gov/>. Accessed October 2025.



The project would be served by the Ventura Unified School District. The district encompasses 26 schools, including preschools, elementary schools, middle schools, and high schools.<sup>30</sup> There are also several higher education institutions located near the project site, including Ventura College, Oxnard College and California State University Channel Islands. The project site is not located in the immediate vicinity of school facilities, and would not have a direct impact on school facilities from construction or operational activities. The project would involve the development of residential uses that could result in additional students. The project would be required to pay development fees that would go towards the provision of school services by the Ventura Unified School District. Pursuant to Section 65996 of the California Government Code, the payment of these development fees is deemed to mitigate any potential impacts to school facilities. Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, and impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to schools, and the project would result in less than significant impacts to schools. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*iv. Parks?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would result in a potentially significant impact related to requiring expansion or construction of new parks and recreation facilities (Impact 4.15-5); this impact was identified as significant and unavoidable. The forecasted population growth within the County may result in physical deterioration of existing parks and recreational facilities; however, implementation of 2040 General Plan policies would require the expansion of existing park and recreation facilities or construction of new facilities in order to avoid physical deterioration from overuse and to maintain an acceptable ratio of parklands to population. The 2040 General Plan EIR concluded that future development of parks and recreational facilities would be subject to applicable laws and regulations, policies and implementation programs of the 2040 General Plan, and mitigation measures identified in the 2040 General Plan EIR. The adverse physical impacts associated with construction of new or expanded park and recreational facilities would be consistent with the impacts of the types of development evaluated in the 2040 General Plan EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases, mitigation measures would not reduce impacts. Because not all potentially significant impacts can be reduced, the impact related to the construction of new or expanded park and recreational facilities was concluded to be significant and unavoidable.

The project site does not contain any public park or recreational facilities and is not directly adjacent to any such facilities. The nearest City-owned parks and facilities include Harry Lyon Park, located approximately 2.4 driving miles south of the project site and Foster Park, located approximately 1.9 driving miles northwest of the project site. The nearest County-owned parks and recreational facilities include Arroyo Verde Park and Ventura Community Park, both located approximately 12 driving miles southeast of the project site. The project proposes residential uses and would provide private on-site recreational amenities including play fields, a teen/adult recreation amenity, playground equipment, a community garden, and walking paths. The project would feature a community center with an active area, a second community center, a playground for children aged five to twelve, another playground for children aged two to five, and a recreation plaza located in the center of the residential site. The

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<sup>30</sup> Ventura Unified School District. 2025. Schools. Available: <https://www.venturausd.org/schools>. Accessed March 2025.

construction of these recreational facilities is included in the environmental impact analysis provided throughout this document, and as addressed herein, the project would not result new or increased impacts beyond those identified in the 2040 General Plan EIR. Additionally, as discussed in Section 14, *Population and Housing*, the project would not result in substantial unplanned population growth that could increase demands on park and recreational facilities and services. The project would comply with Condition of Approval No. B-15, which requires Quimby Ordinance compliance through the provision of park and recreation facilities and/or the payment of in-lieu fees. Therefore, the project would not result in an increase in use of existing parks or other recreational facilities such that substantial physical deterioration occurs or requires the construction or expansion of recreational facilities. Impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact to park and recreational facilities. However, the project would not result in substantial increased demand on park facilities, and impacts would be less than significant. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*v. Other public facilities?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in the expansion or construction of new public libraries or other facilities (Impact 4.15-4). Future development could require the expansion or construction of facilities to meet increased demand or address overcrowding. The 2040 General Plan EIR concluded that future development would be subject to applicable laws and regulations, policies and implementation programs of the General Plan, and mitigation measures identified in the 2040 General Plan EIR. The adverse physical impacts associated with construction of new or expanded public libraries and other facilities would be consistent with the impacts of the types of development evaluated in the 2040 General Plan EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases, mitigation measures would not reduce impacts. Because not all potentially significant impacts can be reduced, the impact of constructing new or expanded libraries and other facilities would be significant and unavoidable.

The project site is not adjacent to any libraries, and project construction and operation would not directly interfere with the operations of an existing library facility. The closest libraries to the project site include the E.P. Foster Library (approximately 3.26 driving miles south of the project site), Museum of Ventura County Research Library (approximately 3.70 driving miles south of the project site), and Avenue Library (approximately 3.14 driving miles south of the project site) in the City of Ventura and the Oak View Library in Oak View (approximately 5.5 driving miles north of the project site). According to the 2040 General Plan Background Report, the Oak View library is adequately sized to serve the population in its vicinity, but the City of Ventura libraries have existing unmet demand.<sup>31</sup> The E.P. Foster Library is in the process of upgrading its facilities, which may help to address the unmet demand in the City of Ventura.<sup>32</sup> Although there is unmet demand for libraries in the City of Ventura, residents of the project may elect to utilize the Oak View Library, which is easily accessible from the project site and is not considered overcrowded. Additionally, as discussed in Section 14, *Population*

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<sup>31</sup> Ventura County. 2020. Background Report for the Ventura County 2040 General Plan, Chapter 7 Public Facilities, Services, and Infrastructure. Available: <https://rmdocs.venturacounty.gov/planning/programs/general-plan/publications/ventura-county-general-plan-background-report-public-facilities-services-and-infrastructure.pdf>. Accessed October 2025.

<sup>32</sup> Ventura County. 2024. New Release-Historic E.P. Foster Library Secures \$13 Million for Major Upgrades. Available: <https://www.cityofventura.ca.gov/ArchiveCenter/ViewFile/Item/3712>. Accessed October 2025.

*and Housing*, the project would not result in substantial unplanned population growth that could increase demands on libraries and other public facilities and services such that new or physically altered facilities would be required. Impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to other public facilities, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

Mitigation measures identified in the 2040 General Plan EIR are not applicable to the project. The following uniformly applied development policies or standards applicable to public services would be incorporated into the project:

- Ventura County Fire Department Codes, Ordinances, and Standards

### **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

#### **Condition of Approval Number B-13: Access Covenant**

The Permittee shall record a covenant and deed restriction upon parcels 063-0-110-035, -065, -090, -145. This covenant shall require upon the sale of any of these parcels, a reciprocal access easement be recorded on all parcels who share the access road(s) / driveway(s). This easement shall allow for an access road(s) / driveway(s) that meet all Ventura County Fire Department Standards and shall be approved by the Ventura County Fire Department prior to recordation. A statement shall be included indicating that the access road covenant and deed restriction shall not be revised or eliminated without written approval of the Fire District.

#### **Condition of Approval Number B-14: Water Mains (Land Divisions)**

The Permittee shall design water mains capable of providing a fire flow of 2,000 gallons per minute at 20 psi and a minimum two-hour duration. The water mains shall be installed from the public right-of-way, or from the purveyor's point of connection to the property line east of Parcel No. 063-0-110-090.

#### **Condition of Approval Number B-15: Quimby Ordinance Compliance**

The Permittee shall collaborate with the General Services Agency/County Parks Department to determine the required mitigation for park and recreational facilities, which may include dedicating land, dedicating and improving land, paying an in-lieu fee, or a combination thereof, as specified in Section 8208-8.3.1 of the Subdivision Ordinance. The Permittee shall receive credit for private open space in accordance with Section 8208-8.3.8 of the Subdivision Ordinance.

**Condition of Approval Number C-30: Private Access Road Design**

The Permittee shall design all new private roads in accordance with Public Road Standards and any additional design requirements outlined in the conditions of approval for the project below, unless modified by the Fire District. All required Fire Access Roads and Driveways, along with cross section(s), shall be shown on the final map or parcel map.

**Condition of Approval Number C-31: Projects Having More Than 100 Dwelling Units or 200 Guest Rooms**

The Permittee shall design the project such that multiple-family residential projects having more than 100 dwelling units or more than 200 guest rooms or a combination thereof, are provided throughout the project with two separate and approved fire apparatus access roads, including secondary access to the site. Access roadways within the project and serving 24 dwelling units or 48 guest rooms may not exceed 400 feet dead-end length.

**Condition of Approval Number C-32: Access Road Certification**

The Permittee shall have all access road(s)/driveway(s) certified by a registered Civil Engineer as having an all-weather surface in conformance with Public Works and / or Fire District Standards.

**Condition of Approval Number C-33: Fire Lanes**

The Permittee shall post all fire lanes in accordance with California Vehicle Code, the International Fire Code and current Ventura County Fire Department Fire Lane Standards. All fire lane markings / signs shall be located within recorded access easements. The Permittee shall maintain all required fire lane markings / signs to be clearly visible.

**Condition of Approval Number C-36: Private Road/Driveway Maintenance Agreement and Fund**

The Permittee shall execute a Road Maintenance Agreement to ensure continuous access by fire apparatus. A Road Maintenance Agreement shall be entered into and be binding on all owners of any parcel within the development. The maintenance agreement shall include all access road improvements (including surfacing, drainage control, vertical clearance, hazard abatement and signs / markings) for this development. On-going road maintenance shall be performed as required to maintain the road and at anytime as requested by the Fire Department. The road maintenance agreement shall be approved by the Fire District. This condition can be satisfied by inclusion within a Homeowners or Property Owners Association (HOA / POA) CC&Rs and dues assessments. If included within CC&R's, an overriding statement shall be included that indicating that access road maintenance requirements and funding provisions shall not be revised or eliminated without written approval of the Fire District

**Condition of Approval Number C-37: Access Road Gates**

The Permittee shall design and install all gates along required fire access roads/driveways consistent with Fire Protection District Standards.

**Condition of Approval Number C-38: Walk and Pedestrian Gates**

The Permittee shall provide a Knox System on all walk / pedestrian gates serving the project area.

**Condition of Approval Number C-49: Fire Flow**

The Permittee shall verify that the water purveyor can provide the required volume and duration at the project. The minimum required fire flow shall be determined as specified by the current adopted edition of the Ventura County Fire Code and the applicable Water Manual for the jurisdiction

(whichever is more restrictive). Given the present plans and information, the required fire flow is approximately 2,000 gallons per minute at 20 psi for a minimum two hour duration. A minimum flow of 1,000 gallons per minute shall be provided from any one hydrant. Note: For Commercial, Industrial, Multi-family buildings, a minimum fire flow of 1,000 GPM shall be provided from each hydrant when multiple hydrants are flowing at the same time.

**Condition of Approval Number C-40: Fire Hydrant(s)**

The Permittee shall provide fire hydrant(s) per the current adopted edition of the Ventura County Fire Code, Appendix C. Design and installation shall conform to the minimum standard of the Ventura County Water Works Manual.

**Condition of Approval Number C-41: Hydrant Location Markers**

The Permittee shall install blue reflective fire hydrant location markers on the access road per Ventura County Fire Department Standards.

**Condition of Approval Number C-42: Fire Sprinklers**

The Permittee shall be responsible to have an automatic fire sprinkler system installed in all structures as required by the VCFD. The fire sprinkler system shall be designed and installed by a properly licensed contractor under California State Law.

**Condition of Approval Number C-43: Fire Alarm**

The Permittee shall be responsible to have a fire alarm system installed in all structures. The fire alarm system shall be designed and installed by a properly licensed contractor under California State Law.

**Condition of Approval Number C-48: Hazardous Fire Area**

The Permittee shall construct all structures to meet hazardous fire area building code requirements.

**Condition of Approval Number C-49: Hazard Abatement**

In lieu of the additional access separation an additional 100-foot brush mitigation measure is required, for a total of 200 feet of brush clearance overall-the first 100 feet is regular brush clearance and the remaining 100 feet being a fuel modification thinning zone from the buildings as a buffer where the wildfire threat is located. Conservation Parcel-Option A -provide an easement for the additional brush clearance area specifically identified as a brush clearance modification zone per VCFD Standards. Indicate and call out this area on the proposed map and provide in all documents to be recorded. Option B-Adjust the parcel line to incorporate the fuel modification zone of 200 feet to be located within the entirety of the existing parcel where the buildings are to be located.

**Condition of Approval Number C-50: Fire Protection Plan**

The Permittee shall prepare a Fire Protection Plan (FPP). The FPP shall be prepared by a qualified fire protection consultant as approved by the Ventura County Fire Department. The Permittee, all land owners, and any tenants shall abide by the approved FPP.

**Condition of Approval Number C-51: Fuel Modification Plans**

The Permittee shall prepare a Fuel Modification Plan (FMP).

**Condition of Approval Number C-52: Fire Department Clearance**

The Permittee shall obtain VCFD Form 610B "Requirements for Construction" for any new structures or additions to existing structures before issuance of building permits.

**Condition of Approval Number C-53: Phasing Plan**

The Permittee shall submit a phasing plan indicating phases, material staging locations and employee parking areas.

**Condition of Approval Number C-54: Inspection Authority**

The Permittee, by accepting these project conditions of approval, shall acknowledge that the fire code official (Fire District) is authorized to enter at all reasonable times and examine any building, structure or premises subject to this project approval for the purpose of enforcing the Fire Code and these conditions of approval.

**Condition of Approval Number B-11: Map Approval**

The Permittee shall submit two (2) copies of any map, including parcel map waivers, to the Fire Prevention Bureau for approval to ensure compliance with all applicable codes, ordinances and project conditions.

**Condition of Approval Number B-12: Recorded Map**

The Permittee shall submit a copy of all recorded maps to the Fire Prevention Bureau to ensure compliance with all applicable codes, ordinances and project conditions.

# 16 Recreation

## Summary of Findings

With regard to Recreation, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. No mitigation measures were included within the 2040 General Plan EIR, and none would be required because project specific impacts would be less than significant.
5. Uniformly applied development policies or standards and no conditions of approval would be incorporated to mitigate potential impacts to recreation.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>16. Recreation</b>						
Would the project:						
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	GP EIR pp 4.15-14 to 4.15-15 Impact 4.15-5	No	No	No	No	Yes
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	GP EIR pp 4.15-14 to 4.15-15 Impact 4.15-5	No	No	No	No	Yes

## Discussion

- a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*
- b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would result in a potentially significant impact related to the expansion or construction of new parks and recreation facilities (Impact 4.15-5); this impact was identified as significant and unavoidable. The 2040 General Plan EIR identifies potentially feasible mitigation measures, where impacts are potentially significant, that would avoid or substantially lessen the impact. However, no additional mitigation measures were identified. The forecasted population growth within the County may result in physical deterioration of existing parks and recreational facilities; however, implementation of 2040 General Plan policies would require the expansion of existing park and recreation facilities or construction of new facilities in order to avoid physical deterioration from overuse and to maintain an acceptable ratio of parklands to population. The 2040 General Plan EIR concluded that future development of parks and recreational facilities would be subject to applicable laws and regulations, policies and implementation programs of the 2040 General Plan, and mitigation measures identified in the 2040 General Plan EIR. The adverse physical impacts associated with construction of new or expanded park and recreational facilities would be consistent with the impacts of the types of development evaluated in the 2040 General Plan EIR, and potentially significant impacts would be mitigated, to the extent feasible, as described in the relevant resource sections. In some cases, mitigation measures would not reduce impacts. Because not all potentially significant impacts can be reduced, the impact related to the construction of new or expanded park and recreational facilities was concluded to be significant and unavoidable.

The project site does not contain any park or recreational facilities and is not directly adjacent to any such facilities. The nearest park and recreational facilities include Arroyo Park, located approximately 5.0 miles southeast of the project site, and Ventura Community Park, located approximately 7.2 miles southeast of the project site. The project proposes residential uses and would provide on-site recreational amenities including play fields, a teen/adult recreation amenity, playground equipment, a community garden, and walking paths. The project would feature a community center with an active area, a second community center, a playground for children aged five to twelve, another playground for children aged two to five, and a recreation plaza located in the center of the residential site. The construction of these recreational facilities is included in the environmental impact analysis provided throughout this document, and as addressed herein, the project would not result in new or increased impacts beyond those identified in the 2040 General Plan EIR. Additionally, as discussed in Section 14, *Population and Housing*, the project would not result in substantial unplanned population growth that could increase demands on park and recreational facilities and services. Therefore, the project would not result in an increase in use of existing parks or other recreational facilities such that substantial physical deterioration would occur or that would require the construction or expansion of recreational facilities. Impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact to recreational facilities. However, the project would include on-site recreational amenities and would not result in substantial unplanned population growth that could increase demand on existing



facilities. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

No mitigation measures were identified in the 2040 General Plan EIR related to park and recreational facilities. Additionally, there are no uniformly applied development policies or standards applicable to the project.

### **Conditions of Approval and Impact Minimization Measures**

#### **Condition of Approval Number B-15: Quimby Ordinance Compliance**

The Permittee shall collaborate with the General Services Agency/County Parks Department to determine the required mitigation for park and recreational facilities, which may include dedicating land, dedicating and improving land, paying an in-lieu fee, or a combination thereof, as specified in Section 8208-8.3.1 of the Subdivision Ordinance. The Permittee shall receive credit for private open space in accordance with Section 8208-8.3.8 of the Subdivision Ordinance.

# 17 Transportation and Traffic

## Summary of Findings

With regard to Transportation and Traffic, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts that the 2040 General Plan EIR did not discuss.
3. No substantial new information has been identified, which result in an impact that is more severe than anticipated by the 2040 General Plan EIR.
4. No mitigation measures contained within the 2040 General Plan EIR would be required because project-specific impacts would be less than significant.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts related to transportation and traffic.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>17. Transportation and Traffic</b>						
Would the project:						
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	GPEIR pp. 4.16-34 to 4.16-35 Impact 4.16-4	No	No	No	No	Yes
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	GP EIR pp. 4.16-23 to 4.16-28 Impact 4.16-1	No	No	No	No	Yes
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	GP EIR pp. 4.16-28 to 4.16-33 Impact 4.16-2	No	No	No	No	Yes
d. Result in inadequate emergency access?	GP EIR pp. 4.16-33 to 4.16-34 Impact 4.16-3	No	No	No	No	Yes

## Discussion

*a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would improve existing bicycle and pedestrian infrastructure in the county and would increase the safety of as well as expand access to public transportation facilities (Impact 4.16-4). This impact was determined to be less than significant.

The primary roadways serving the project site include North Ventura Avenue and SR 33. The nearest existing public transit facilities are located approximately 700 feet from the project site and serve Gold Coast Transit Bus Route 16, with additional service from Route 18 located approximately 141 feet away.<sup>33</sup> There are no sidewalks along North Ventura Avenue and the surrounding roadway network near the project site. However, Class I bicycle lanes are currently present along North Ventura Avenue providing regional connectivity for cyclists in the area. The Ventura County Active Transportation Plan identifies North Ventura Avenue as part of the County's existing and planned bikeway network, with recommendations for enhanced bicycle infrastructure and improved pedestrian access in unincorporated communities.<sup>34, 35</sup>

Project construction activities have the potential to affect the circulation through additional vehicles and equipment accessing public roads, as well as temporary lane closures. Construction activities would include the movement of light-duty, medium-duty, and heavy-duty vehicles along SR 33 and various County-and City-maintained roads. Therefore, temporary construction activities may intermittently reduce, disrupt, or temporarily restrict access to portions of the local roadway network during construction of the project. Although traffic may be temporarily disrupted at times during construction, construction activities would not be expected to contribute a substantial amount of vehicle traffic to these roadways. Additionally, the project would implement traffic control measures to provide for the safe movement of vehicles, bicycles, and pedestrians in accordance with Ventura County's encroachment permit conditions (Condition of Approval No. C-27). With encroachment permit implementation, potential conflicts resulting from construction would be minimized. Construction traffic would be temporary, and any traffic increase would be negligible. Due to the temporary nature of construction traffic impacts, construction-related traffic would not be anticipated to result in a conflict with a program, plan, ordinance, or policy addressing the circulation system.

The project includes the construction of internal roadways and two full-access driveways along North Ventura Avenue, as well as a gated emergency access on Floral Drive. These improvements are designed to integrate with the existing circulation network and would not result in permanent alterations to the surrounding circulation infrastructure. Therefore, operation of the project would not disrupt existing roadway, bicycle, or transit services or facilities, nor would it interfere with the implementation of planned roadway, bicycle, or transit improvements outlined in adopted programs, plans, policies, or ordinances. The project would pay the required traffic impact mitigation fees (Condition of Approval No. C-25), dedicate rights-of-way along North Ventura Avenue and Floral Drive consistent with Ventura County and City of Ventura requirements (Condition of Approval No. B-9),

<sup>33</sup> Gold Coast Transit. 2025. All Routes. Available: <https://www.gctd.org/getting-around/routes-schedules/>. Accessed October 2025.

<sup>34</sup> Ventura County Transportation Commission. 2022. Regional Bike Map. Available: <https://www.goventura.org/getting-around/bike-map/>. Accessed September 2025.

<sup>35</sup> Ventura County Public Works. 2025. County of Ventura Active Transportation Plan. Available: <https://publicworks.venturacounty.gov/2022/03/11/county-of-ventura-active-transportation-plan-english/>. Accessed September 2025.

implement roadway improvements on North Ventura Avenue and Floral Drive including new sidewalks (Condition of Approval No. A-18), and provide driveway access in accordance with the Ventura County and City of Ventura standards (Condition of Approval No. C-26). Roadway improvements completed by the project would improve pedestrian access and roadway safety for all users of the circulation system. Therefore, operation of the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR concluded that implementation of the 2040 General Plan would improve bicycle and pedestrian infrastructure and expand access to public transportation, resulting in less than significant impacts. The project would implement roadway improvements, provide new sidewalks, and enhance pedestrian safety and would not conflict with existing or planned transportation infrastructure or policies. Therefore, the project would be consistent with the analysis in the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

CEQA Guidelines Section 15064.3 determines the significance of transportation impacts of projects. This section describes specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. "Vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact.<sup>36</sup>

The 2040 General Plan EIR identified that implementation of the 2040 General Plan would exceed the applied VMT thresholds for residential, office, industrial, retail, agriculture, and infrastructure projects (Impact 4.16-1). The 2040 General Plan EIR determined that the policies and implementation programs described in the 2040 General Plan were designed to reduce VMT impacts that would result from implementation of the 2040 General Plan to a reasonable extent. For example, 2040 General Plan Policy CTM-4.1 and CTM Implementation Programs B and C were designed to specifically address VMT evaluation, analysis, and reduction standards for future development projects. Mitigation Measure CTM-1 required the County to include a new implementation program in the 2040 General Plan related to interim VMT CEQA assessment criteria. Mitigation Measure CTM-2 requires the County to include VMT in the ISAGs, and Mitigation Measure CTM-3 required the County to include a VMT reduction program in the 2040 General Plan. Although Mitigation Measures CTM-1, CTM-2, and CTM-3 would reduce VMT associated with implementation of the 2040 General Plan, the 2040 General Plan EIR concluded that it would not be possible to reduce VMT from the growth accommodated by the 2040 General Plan to a less than significant level. This impact was identified as significant and unavoidable.

Construction activities associated with the project would not result in long-term increases in vehicular trips along surrounding roadways, as construction is temporary and intermittent in nature. VMT generated by construction personnel would not represent newly generated trips, but rather a redistribution of existing regional travel patterns based on daily worksite assignments. Therefore,

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<sup>36</sup> Association of Environmental Professional. 2025. 2025 CEQA Statute & Guidelines. Available: [https://www.califaep.org/docs/CEQA\\_Handbook\\_2025combined.pdf](https://www.califaep.org/docs/CEQA_Handbook_2025combined.pdf). Accessed November 2025.

project construction would result in less than significant impacts related to an inconsistency with CEQA Guidelines section 15064.3, subdivision (b).

Pursuant to the Governor's Office of Land Use and Climate Innovation Technical Advisory on Evaluating Transportation Impacts in CEQA and the Ventura County ISAGs, a project that provides 100 percent affordable housing can be presumed to have a less than significant impact related to VMT, and is screened from a full VMT analysis.<sup>37, 38</sup> The project involves construction of a 100 percent affordable, 328-unit farmworker housing complex restricted to farmworkers who qualify as lower income, which is classified as individuals and families who make 80 percent of area median income and below. Therefore, the project meets the VMT screening criteria established by the State and Ventura County, and the project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact related to VMT due to growth under the 2040 General Plan. However, the project would not result in significant VMT impacts during construction or operation. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*

The 2040 General Plan EIR identified that compliance with 2040 General Plan Policies CTM-2.3 and LU-16.5 would ensure that discretionary development is consistent with County standards related to geometric design hazards and that, if needed, mitigation measures would be identified and implemented to minimize or eliminate potential hazards (Impact 4.16-2). The 2040 General Plan EIR also identified that implementation of the 2040 General Plan could result in transportation hazards along roadways within designated substandard roadway impact areas, including along Box Canyon Road and portions of Katherine Road in the Santa Susana Knolls community, and along portions of Lynn Road, Ventu Park Road, and Haigh Road in the Ventu Park community (Impact 4.16-2). The implementation of Mitigation Measure CTM-4, which requires the County to include an Updated Traffic Fee Mitigation Program in the 2040 General Plan, would reduce hazards due to design features or incompatible use. However, the 2040 General Plan EIR determined that no additional feasible mitigation was available to eliminate safety concerns associated with identified substandard roadways. This impact was determined to be significant and unavoidable.

The project site is not located along one of the substandard roadways identified in the 2040 General Plan EIR. The project would not require the construction of any new public roadways; however, modifications to the existing roadway network would occur along North Ventura Avenue and Floral Drive to provide safe and efficient access to the project site. Specifically, the project includes two full-access driveways on North Ventura Avenue and a gated emergency access on Floral Drive. Internal circulation would be supported by new private roadways designed to accommodate residential traffic and emergency vehicle access. The project would comply with 2040 General Plan Policy CTM-2.3 which requires discretionary development with access onto a County road to have the access point(s) designed and built to County standards. The proposed driveways and internal roadways would comply

<sup>37</sup> Governor's Office of Planning and Research. 2018. Technical Advisory on Evaluating Transportation Impacts In CEQA. Available: [https://lci.ca.gov/docs/20180416-743\\_Technical\\_Advisory\\_4.16.18.pdf](https://lci.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf). Accessed October 2025.

<sup>38</sup> Ventura County. 2025. Initial Study Assessment Guidelines. Available: <https://rmadocs.venturacounty.gov/planning/programs/california-environmental-quality-act/publications/ventura-county-initial-study-assessment-guidelines.pdf>. Accessed October 2025.

with Ventura County Road Standards, the Driveways and Curb Cuts Brochure, and applicable County Access Policies. The project would pay the required traffic impact mitigation fees to the City of Ventura (Condition of Approval No. C-25), dedicate rights-of-way along North Ventura Avenue and Floral Drive consistent with Ventura County and City of Ventura requirements (Condition of Approval No. B-9), implement roadway improvements on North Ventura Avenue and Floral Drive including new sidewalks (Condition of Approval No. A-18), and provide driveway access in accordance with the Ventura County and City of Ventura standards (Condition of Approval No. C-26). Therefore, the roadway modifications and internal circulation improvements associated with the project would be constructed to ensure the safe movement of vehicles, pedestrians, and bicyclists in and around the project site and would not create a hazard due to a geometric design feature. Additionally, the proposed residential uses would be compatible with other residential development in the project area, and would not result in a hazard due to an incompatible use.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact related to transportation hazards due to design features or incompatible uses. However, the project would implement access and circulation improvements consistent with Ventura County standards and would result in a less than significant impact. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*d. Result in inadequate emergency access?*

The 2040 General Plan EIR determined that implementation of the 2040 General Plan would result in an increased number of users on the County transportation systems which could adversely affect emergency access (Impact 4.16-3). The implementation of Mitigation Measure CTM-5, which requires the County to include a policy in the 2040 General Plan to ensure that all new discretionary projects fully evaluate potential impacts to emergency access, and Mitigation Measure CTM-6, which requires the County to include a policy in the 2040 General Plan to plan capital improvements to provide appropriate emergency access, would reduce impacts related to emergency access. However, because not all transportation infrastructure with inadequate emergency access would be upgraded and enhanced within the timeframe of the 2040 General Plan, the 2040 General Plan EIR identified that this impact would be significant and unavoidable.

The project would involve the construction of two full-access driveways along North Ventura Avenue and a gated emergency access road on Floral Drive, located south of Bounds Road. The Floral Drive entrance is designed to be used exclusively by first responders and would remain gated unless opened during an emergency. Internal circulation within the site would be supported by newly constructed private driveways designed to accommodate residential traffic and emergency vehicles. All access points and internal roadways would be constructed in accordance with Ventura County Road Standards and VCFD fire access requirements (Condition of Approval Nos. C-30, C-32, C-34, and C-36-C-38), ensuring safe and unobstructed emergency access. As such, adequate emergency access would be provided and maintained throughout both the construction and operational phases of the project. Impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact related to emergency access due to increased demand on the County's transportation systems and existing substandard roadway conditions. However, the project would result in less than significant impacts to emergency access through compliance with County standards. Therefore, the project would be consistent with the analysis of the 2040 General Plan EIR because it would not create new

significant impacts, or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

Mitigation measures identified in the 2040 General Plan EIR are not applicable to the project. The following uniformly applied development policies or standards applicable to transportation and traffic would be incorporated into the project:

- **2040 General Plan Policy CTM-1.1: Vehicle Miles Traveled (VMT) Standards and CEQA Evaluation.** The County shall require evaluation of County General Plan land use designation changes, zone changes, and discretionary development for their individual (i.e., project-specific) and cumulative transportation impacts based on Vehicle Miles Traveled (VMT) under the California Environmental Quality Act (CEQA) pursuant to the methodology and thresholds of significance criteria set forth in the County Initial Study Assessment Guidelines.
- **2040 General Plan Policy CTM-1.7: Pro Rata Share of Improvements.** The County shall require discretionary development that would generate additional traffic pays its pro rata share of the cost of added vehicle trips and the costs of necessary improvements to the Regional Road Network pursuant to the County's Traffic Impact Mitigation Fee Ordinance.
- Ventura County "Paveout Policy"
- Ventura County Code of Ordinances Division 8, Chapter 4 – Urban Area Development
- City of Ventura Standard Detail No. 104

### **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

#### **Condition of Approval Number A-18: Road Improvements**

Road improvements are required in accordance with the Ventura County North Ventura Avenue Area Plan, County of Ventura Public Works Agency Road Standards, the City of Ventura Road Standard Details, 2040 General Plan Circulation, Transportation and Mobility Element Policies CTM Policies 1.1, 1.2, 1.3, 1.4, 1.5, 1.6 and 1.7, the "Paveout Policy" dated January 16, 1968; and Code of Ordinances Division 8, Chapter 4 – Urban Area Development. Ventura Avenue has an existing variable road width. The minimum required road width is 68 feet, curb face to curb face per City of Ventura Standard Detail No. 105 for a Secondary Arterial Street. Construct road improvements including, without limitation, roadway widening, curb and gutter, 10-foot wide sidewalk, street trees, and street tree wells along the parcel's frontage in accordance with City Standard Detail No. 105 for a Secondary Arterial Street.

Floral Drive is a public street required by the City of Ventura in the North Ventura Avenue Plan. The minimum required road width is, according to the City of Ventura, to be 46 feet from curb face to curb face per City of Ventura Standard Detail No. 105 for a Collector Street modified to have 46 feet of paved width, curb face to curb face, and a five-foot wide parkway with 5-foot wide sidewalk on the west side of Floral Drive. Construct road improvements in accordance with City requirements including, without limitation, a 43-foot wide roadway, curb and gutter, 5-foot wide sidewalk on the west side of Floral Drive with 5-foot parkway, and street trees in accordance with the City's modified Standard Detail 105 for a Commercial Street. The transition from the existing 60-foot wide right-of-way Floral Drive improvements in the adjacent tract northerly of the project to the 56-foot wide

proposed Floral Drive improvements must be in accordance with City of Ventura standards and requirements.

Submit road improvement plans prepared by a Registered Civil Engineer to the Public Works Agency – Transportation Department and the City of Ventura Public Works, Land Development Section for review and approval. Enter into an agreement with the County to complete the road improvements. Submit the agreement to the Public Works Agency – Transportation Department for review and approval. Post sufficient surety guaranteeing the construction of the road improvements. Submit proof to the Public Works Agency – Transportation Department that the surety has been posted.

**Condition of Approval Number B-9: Dedication of Right-of-Way**

North Ventura Avenue has an existing right-of-way width of 84 feet. The minimum required right-of-way width is based on the City of Ventura's current Road Standard Details and is 88 feet per City of Ventura Road Secondary Arterial Standard Detail 105. Right-of-way is required in accordance with the Ventura County North Ventura Avenue Area Plan; Ordinance 1607 dated November 10, 1964; the "Paveout Policy" dated January 16, 1968; and Code of Ordinances Division 8, Chapter 4 – Urban Area Development.

- a. Dedicate  $(88 \text{ feet} - 84 \text{ feet})/2 = 2'$  of right-of-way (half of minimum street right-of-way required) along the parcel's frontage on Ventura Avenue in accordance with City of Ventura Road Standard Detail No. 105 for a Secondary Arterial.
- b. Dedicate an irrevocable 56 feet of right-of-way on Floral Drive in accordance with the City of Ventura's requirements in an alignment acceptable to the City of Ventura. This irrevocable dedication will be rejected by the County until such time that the roadway is annexed into the City.

**Condition of Approval Number C-25: Transportation Impact Mitigation Fee to City of Ventura**

The Permittee shall deposit with the PWA – Transportation Department a TIMF. The trip generation rate and TIMF will be calculated and provided to the City of Ventura based on the Permittee's information. The Permittee may choose to submit additional information or provide a Traffic Study to supplement the information currently provided to establish the trip generation rate. The TIMF may be adjusted for inflation at the time of deposit in accordance with the latest version of the Engineering News Record Construction Cost Index.

**Condition of Approval Number C-26: Driveway Access**

The driveways shall be constructed per City of Ventura Standard Detail No. 104. The Permittee shall obtain an Encroachment Permit (EP) from the County Public Works Agency – Transportation Department. Contact the Transportation Department Permits Division at 654-2055 for the requirements of the EP. The EP form is available on the internet. Improvement plans and supporting documentation may be required by the Encroachments Division.

**Condition of Approval Number C-27: Encroachment Permit**

The Permittee shall contact the Encroachments Division at 654-2055 for requirements of the permit.

**Condition of Approval Number C-30: Private Access Road Design**

The Permittee shall design all new private roads in accordance with Public Road Standards and any additional design requirements outlined in the conditions of approval for the project below, unless modified by the Fire District. All required Fire Access Roads and Driveways, along with cross section(s), shall be shown on the final map or parcel map.



**Condition of Approval Number C-31: Projects Having More Than 100 Dwelling Units or 200 Guest Rooms**

The Permittee shall design the project such that multiple-family residential projects having more than 100 dwelling units or more than 200 guest rooms or a combination thereof, are provided throughout the project with two separate and approved fire apparatus access roads, including secondary access to the site. Access roadways within the project and serving 24 dwelling units or 48 guest rooms may not exceed 400 feet dead-end length.

**Condition of Approval Number C-32: Access Road Certification**

The Permittee shall have all access road(s)/driveway(s) certified by a registered Civil Engineer as having an all-weather surface in conformance with Public Works and / or Fire District Standards.

**Condition of Approval Number C-34: Fire Lanes**

The Permittee shall post all fire lanes in accordance with California Vehicle Code, the International Fire Code and current Ventura County Fire Department Fire Lane Standards. All fire lane markings / signs shall be located within recorded access easements. The Permittee shall maintain all required fire lane markings / signs to be clearly visible.

**Condition of Approval Number C-36: Private Road/Driveway Maintenance Agreement and Fund**

The Permittee shall execute a Road Maintenance Agreement to ensure continuous access by fire apparatus. A Road Maintenance Agreement shall be entered into and be binding on all owners of any parcel within the development. The maintenance agreement shall include all access road improvements (including surfacing, drainage control, vertical clearance, hazard abatement and signs / markings) for this development. On-going road maintenance shall be performed as required to maintain the road and at any time as requested by the Fire Department. The road maintenance agreement shall be approved by the Fire District. This condition can be satisfied by inclusion within a Homeowners or Property Owners Association (HOA / POA) CC&Rs and dues assessments. If included within CC&R's, an overriding statement shall be included that indicating that access road maintenance requirements and funding provisions shall not be revised or eliminated without written approval of the Fire District

**Condition of Approval Number C-37: Access Road Gates**

The Permittee shall design and install all gates along required fire access roads/driveways consistent with Fire Protection District Standards.

**Condition of Approval Number C-38: Walk and Pedestrian Gates**

The Permittee shall provide a Knox System on all walk / pedestrian gates serving the project area.

**Condition of Approval Number C-53: Phasing Plan**

The Permittee shall submit a phasing plan indicating phases, material staging locations and employee parking areas.

# 18 Tribal Cultural Resources

## Summary of Findings

With regard to Tribal Cultural Resources, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. Mitigation measures identified in the 2040 General Plan EIR would be applicable.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts to tribal cultural resources.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>18. Tribal Cultural Resources</b>						

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	GP EIR pp.4.5-21 to 4.5-24 Impact 4.5-3	No	No	No	No	Yes
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Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	GP EIR pp.4.5-21 to 4.5-24 Impact 4.5-3	No	No	No	No	Yes

## Discussion

- a. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
- b. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan could result in the potential loss of tribal cultural resources because it is possible that tribal cultural resources could be identified or discovered during project-specific analysis and/or future development under the 2040 General Plan. The 2040 General Plan EIR concluded that ground-disturbing activities associated with implementation of the 2040 General Plan could result in a substantial change in the significance of a tribal cultural resource (Impact 4.5-3). However, impacts would be reduced with implementation of Mitigation Measures: CUL-1a, CUL-1b, and CUL-1c that require discretionary development projects to protect existing resources and avoid potential impacts to the maximum extent feasible. Implementation of Mitigation Measure CUL-2 would require the identification of listed, eligible, or unevaluated sites in coordination with the Cultural Heritage Board. Further, policy modifications provide the opportunity for the Cultural Heritage Board to offer project-level recommendations and guidance to ensure that efforts are made to avoid, preserve, or otherwise mitigate impacts to historic resources. Mitigation Measures CUL-4 and CUL-5 would provide clearer language related to the preservation of tribal cultural resources, identify coordination with the Native American Heritage Center, and require when necessary, consultation with tribal and preservation groups. However, it is

still possible that future development resulting from the 2040 General Plan could uncover previously unknown tribal cultural resources during project-level construction activities, the discovery of which may result in damage, destruction, or changes in significance, of tribal cultural resources. Therefore, the full protection of tribal cultural resources cannot be guaranteed at the program level of analysis. In addition, the 2040 General Plan EIR concluded there were no actions or policies that the County could feasibly mandate to fully replace the loss of tribal cultural resources; this impact was identified as significant and unavoidable.

2040 General Plan Policy COS-4.4 was established in response to General Plan EIR Mitigation Measure CUL-1a, which requires that all discretionary development projects be assessed for potential tribal, cultural, historical, paleontological, and archaeological resources by a qualified professional and shall be designed to protect existing resources. Additionally, Implementation Programs COS-HH and COS-II were established in response to 2040 General Plan EIR Mitigation Measures CUL-1b and CUL-1c, respectively, which require a records search and Sacred Lands File search with the South Central Coastal Information Center for discretionary projects, and procedures for the protection and avoidance of cultural resources.

In accordance with the requirements of the 2040 General Plan and 2040 General Plan EIR mitigation measures, a Phase I CRA was prepared to assess the potential for impacts to tribal, cultural, historical, paleontological, and archaeological resources (Appendix F). The project was submitted to the Native American Heritage Commission (NAHC) to obtain the Sacred Lands File search results and a consultation list of tribes traditionally and culturally affiliated with the project area, in accordance with Public Resources Code section 21080.3.1(c). The NAHC provided a list of tribes for formal notification, consistent with the requirements of AB 52. The purpose of this consultation is to proactively identify potential tribal cultural resources and avoid or mitigate impacts to tribal cultural resources. The NAHC also conducted a Sacred Lands File check, which returned a negative result. Although not required for projects that qualify for the CEQA Guidelines Section 15183 exemption, the County mailed notices to the tribes on the NAHC AB 52 list to inform the tribes of the project and gather input. One tribe responded requesting consultation: the Barbareño/Ventureño Band of Mission Indians. Consultation took place on September 9, 2025, and the parties agreed to conditions of approval addressing archaeological and Native American monitoring during ground disturbance and protocols in the event that unanticipated resources are discovered. This consultation process supports the protection of tribal cultural resources potentially present within the project site. Furthermore, as described in Section 5, *Cultural Resources*, the project would implement the recommended measures provided in the Phase I CRA, which include Mitigation Measures CUL-1 through CUL-3. These measures require archaeological and Native American monitoring during construction activities, as well as resource recovery protocol for archaeological, tribal, and fossil resources discovered during construction. The project would also be conditioned to require that the applicant stops work and analyzes any paleontological or archaeological finds should they be discovered during ground disturbance (Condition of Approval No. A-13). Therefore, project impacts would be less than significant with implementation of mitigation.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact related to the potential loss of tribal cultural resources due to ground-disturbing activities. However, the project has undergone consultation with affiliated tribes, conducted a Sacred Lands File search with negative results, would conduct monitoring during construction, and is conditioned to halt work and evaluate any discoveries during construction, and impacts would be less than significant with mitigation. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously

identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

In accordance with Mitigation Measure CUL-1c of the 2040 General Plan EIR, Mitigation Measures CUL-1 through CUL-3, listed above in Section 5, *Cultural Resources*, would be implemented to reduce potential impacts to tribal cultural resources.

In addition, the following uniformly applied development policy or standard would be incorporated into the project:

- **2040 General Plan Implementation 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.
- **2040 General Plan Implementation Program COS-II: Cultural, Historical, Paleontological, and Archaeological Resource Assessment Procedures.** For discretionary projects, the County shall require the following:
  - i. Projects shall be designed to protect existing resources and shall avoid potential impacts to the maximum extent feasible.
  - ii. 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.
  - iii. If any materials or artifacts are discovered during ground disturbance and/or construction activities, construction shall halt until a qualified archaeologist, paleontologist, or Native American monitor can access the discovery. A report or memorandum shall be prepared by the qualified monitor documenting any findings and identifying recommendations for protection or avoidance of discovered resources. Recommendations or mitigation identified by the qualified monitor shall be implemented prior to commencing.

### **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

#### **Condition of Approval Number A-12: Archaeological Monitoring**

The Permittee shall retain archaeological and Native American monitors to monitor all subsurface grading, trenching, or construction activities on the project site.

#### **Condition of Approval Number A-13: Archaeological Resources Discovered During Grading**

The Permittee shall implement the following procedures:

- a. If any archaeological or historical artifacts are uncovered during ground disturbance or construction activities, the Permittee shall:
  - (1) Cease operations and assure the preservation of the area in which the discovery was made;
  - (2) Notify the Planning Director in writing, within three days of the discovery;
  - (3) Obtain the services of a County-approved archaeologist who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;

**Ventura Ranch Farmworker Housing Complex**

- (4) Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development; and
  - (5) Implement the agreed upon recommendations.
- b. If any human burial remains are encountered during ground disturbance or construction activities, the Permittee shall:
  - (1) Cease operations and assure the preservation of the area in which the discovery was made;
  - (2) Immediately notify the County Coroner and the Planning Director;
  - (3) Obtain the services of a County-approved archaeologist and, if necessary, Native American Monitor(s), who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
  - (4) Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development on-site; and
  - (5) Implement the agreed upon recommendations.

# 19 Utilities

## Summary of Findings

With regard to the issue area of Utilities, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. No mitigation measures were included within the 2040 General Plan EIR, and none would be required because project specific impacts would be less than significant.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate potential impacts to utilities.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>19. Utilities</b>						
Would the project:						
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	General Plan FEIR pp. 4.17-10 to 4.17-13 Impacts 4.17-1 and 4.17-2	No	No	No	No	Yes
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	General Plan FEIR pp. 4.17-14 to 4.17-19 Impact 4.17-4	No	No	No	No	Yes

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	General Plan FEIR pp. 4.17-12 to 4.17-13 Impact 4.17-3	No	No	No	No	Yes
d. Result in a direct or indirect adverse effect on a landfill's disposal capacity, such that it reduces its useful life to less than 15 years?	GP EIR pp. 4.17-19 to 4.17-20 Impact 4.17-5	No	No	No	No	Yes
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	GP EIR p. 4.17-5 Issue dismissed	No	No	No	No	Yes

## Discussion

- a. *Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

The 2040 General Plan EIR determined that any necessary connections for future development under the 2040 General Plan would be constructed before occupancy and in a manner that would minimize the potential for utility service disruption of existing uses. Therefore, the 2040 General Plan EIR concluded implementation of the 2040 General Plan would not cause a substantial disruption or rerouting of utility facilities and the impact was concluded to be less than significant (Impact 4.17-1). The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would result in a potentially significant impact related to the construction of new or expanded utility infrastructure (Impact 4.17-2); this impact was identified as potentially significant. 2040 General Plan Policies, such as PFS-1.7, PFS-4.1, PFS-7.1, PFS-7.5, and WR-1.11, limit approval of discretionary development to locations where adequate public facilities, services, and infrastructure are available and functional, before occupancy; include coordination between the County and utility companies and service providers to ensure that gas, electric, and communication services are located appropriately to provide adequate services; require adequate provision of water supply for discretionary development; and require connections to existing wastewater collection and treatment facilities, if available. Additionally, to maintain adequate levels of services, the County would be required to prepare, adopt, and periodically update capital improvement programs for all County-owned and



operated facilities through Implementation Program PFS-A. The Ventura Local Agency Formation Commission's authority to regulate the jurisdictional boundaries of public agency service providers would help to ensure that adequate water and wastewater service capacity is available to serve future development. The 2040 General Plan EIR identified compliance with the policies and implementation programs of the 2040 General Plan could result in the construction of new or expanded infrastructure facilities. The 2040 General Plan EIR identified potentially feasible mitigation measures throughout the document, where potentially significant impacts were identified. However, because not all potentially significant impacts of the 2040 General Plan could be reduced to less than significant, and some significant and unavoidable impacts would result, the impact of constructing new or expanded utility infrastructure in response to increased demand under the 2040 General Plan was concluded to be significant and unavoidable.

The project site is within an urban area with existing utility infrastructure available to serve the project, including natural gas, overhead electric, sewer, street lighting, storm drain, water, and telephone lines. The project would connect to existing utility infrastructure serving the project site, including water service from Ventura Water, sewer service from Ojai Valley Sanitation District, and electricity from Southern California Edison. No natural gas connections are proposed, as the buildings would be all-electric. Proposed infrastructure improvements include local connections to the electric distribution lines serving the site, connections to domestic and fire water (public), fire hydrants, underground stormwater detention basins, and private storm drain systems. Additionally, the project would comply with the County's requirement to underground all electric, cable, phone, and internet utilities (Condition of Approval No. C-17), implement stormwater drainage improvements on the site (Condition of Approval No. C-20), and obtain a will serve letter from Ventura Water to confirm that adequate water infrastructure and supplies are available to serve the project (Condition of Approval Nos. B-8 and C-28). Therefore, the project would not require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact related to the construction of new or expanded utility infrastructure to support future development. However, the project would utilize existing utility systems and would not result in significant environmental effects. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

*b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would potentially affect available water supplies during normal, single-dry, and multiple-dry year scenarios from public water suppliers, with adverse effects being more likely during single-and multiple-dry year scenarios (Impact 4.17-4); this impact was identified as potentially significant. The 2040 General Plan EIR identified 2040 General Plan policies that contain various methods of water conservation and water planning for future development; however, existing County standards in the Ventura County Waterworks Manual do not guarantee that water supplies would be available to serve all future development during normal, single-dry, and multiple-dry years. Mitigation Measure UTL-1, which requires the County to include Implementation Program WR-I in the 2040 General Plan and require a water supply assessment to be prepared for projects that require service from a public water system

prior to project approval was identified to reduce impacts. However, at the program level of analysis of the 2040 General Plan EIR, it was determined that it was not possible to conclude that adequate water supplies would be available during normal, single-, and multiple dry years to meet future demand in all locations of the county for all potential project types through 2040. As such, the 2040 General Plan EIR concluded impacts to be significant and unavoidable.

Water service for the project would be provided by Ventura Water, which currently serves the area and has existing infrastructure in place to support the proposed development. According to the 2020 Urban Water Management Plan, Ventura Water is projected to have sufficient water supply to meet future demands through 2045 under normal, single-dry, and multiple-dry year conditions including the projected demand to support the project. By 2025, Ventura Water anticipates a total supply of approximately 23,820 acre-feet per year, increasing to over 26,500 acre-feet by 2045, which exceeds the projected demand (16,422 acre-feet per year) and includes a buffer for drought resilience and growth-related needs.<sup>39</sup>

Project water demand would be minimized through compliance with existing regulations and conditions of approval. Landscaping would be designed to comply with VCFD clearance standards and would utilize drought-tolerant, non-invasive species suited to the local Mediterranean climate. The project would also comply with the County's landscaping and screening requirements, including the California Department of Water Resources Model Water Efficient Landscape Ordinance (MWELO)(Condition of Approval No. C-7). Additionally, the project would include water-efficient fixtures and comply with CALGreen standards, further reducing overall water demand. The project would be required to obtain a water supply certificate and will serve letter from Ventura Water (Condition of Approval Nos. B-8 and C-28). Pursuant to the ISAGs, projects that obtain water from cities, county waterworks districts, water districts, special districts, other public entities, private water companies, and mutual water companies and that receive a water availability letter or will serve letter are considered to have sufficient water supplies.<sup>40</sup> Therefore, sufficient water supplies would be available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. This impact would be less than significant.

As previously discussed, the 2040 General Plan EIR identified significant and unavoidable impacts related to water supplies. However, the project would have sufficient water supplies and would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- c. *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would not result in inadequate wastewater services (Impact 4.17-3); this impact was concluded to be less than significant. Ventura County is served by 16 wastewater collection, treatment, recycling, and disposal service providers, consisting of the County, county services areas, special districts, cities, and contract entities. With implementation of 2040 General Plan Policies PFS-4.1, WR-3.4, WR-3.2, and WR-3.3,

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<sup>39</sup> Ventura Water. 2021. 2020 Urban Water Management Plan. Available: <https://www.cityofventura.ca.gov/DocumentCenter/View/27446/2020-Draft-Urban-Water-Management-Plan-Main-Text>. Accessed October 2025.

<sup>40</sup> Ventura County. 2025. Ventura County Initial Study Assessment Guidelines. Available: [ventura-county-initial-study-assessment-guidelines.pdf](#). Accessed October 2025.

2040 General Plan implementation programs, and compliance with NPDES permitting requirements, the 2040 General Plan EIR concluded adequate wastewater services would be available for future development.

The project would be served by the Ojai Valley Sanitation District for wastewater treatment, with new connections to existing sewer infrastructure proposed as part of the development. The project would not include industrial or commercial uses that generate high volumes of wastewater. Wastewater generation would be typical of residential developments and is anticipated to be within the capacity of the existing wastewater treatment system operated by the Ojai Valley Sanitation District. Additionally, the project would assure each lot created by the subdivision has an approved method of sewage disposal through a Sewer Service Certificate approved and signed by Ojai Valley Sanitation District and the Ventura County Environmental Health Division (Condition of Approval No. B-7). Compliance with this condition of approval would ensure that the project provides the requisite sewer connections and that Ojai Valley has adequate capacity to serve the project's wastewater demand. Therefore, the project would not result in a determination by the wastewater treatment provider that serves the project that it has inadequate capacity to serve the project's projected demand, in addition to the provider's existing commitments, and the impact would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to wastewater treatment facilities, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- d. *Result in a direct or indirect adverse effect on a landfill's disposal capacity, such that it reduces its useful life to less than 15 years?*
- e. *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The 2040 General Plan EIR identified that implementation of the 2040 General Plan would support the long-term reduction of solid-waste generation in the county (Impact 4.17-5). The 2040 General Plan EIR identified 2040 General Plan Policies PFS-5.4, PFS-5.5, PFS-5.6, and PFS-5.9, which would promote solid waste reduction, recycling and composting efforts, direct the County to support beneficial reuse of agricultural waste for activities such as composting and energy generation and would encourage applicants for discretionary development to employ practices that reduce the quantities of waste generated and engage in recycling activities to reduce the volume of waste disposed of in landfills. The 2040 General Plan policies would reduce disposal quantities to landfills and would support State statutes and requirements related to waste reduction and diversion goals. The 2040 General Plan EIR identified that existing landfills within Ventura County have sufficient capacity to serve the county, and that future development would support waste reduction regulations and would not generate an excess of solid waste. The 2040 General Plan EIR concluded this impact to be less than significant.

Project construction would generate solid waste from demolition, site preparation, and building activities, which would be disposed of at a permitted landfill such as Toland Road Landfill, located approximately 17.6 miles northeast of the site. Construction waste would be minimized through compliance with Ventura County Ordinance Code Section 4773 et seq. and CALGreen, which require the diversion of recyclable construction and demolition materials (Condition of Approval No. C-23).

Existing landfill facilities are anticipated to have sufficient capacity to accommodate the solid waste temporarily generated during construction. During operation, the project would generate typical residential solid waste from the 328 housing units and associated community facilities. The project would be required to comply with Ventura County Code of Ordinances related to solid waste management, including the diversion of recyclables and organic waste materials through recycling, reuse, salvage, or composting (Condition of Approval Nos. C-22 and C-24). Compliance with these conditions of approval would ensure that the project is consistent with federal, state, and local regulations related to solid waste, and the project would not generate excessive amounts of landfilled solid waste. Therefore, the project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure. The project would also comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR did not identify significant impacts related to solid waste, and the project would not result in a significant impact for this topic. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts, or increase the severity of previously identified significant impacts, as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

Mitigation measures identified in the 2040 General Plan EIR are not applicable to the project. The following uniformly applied development policy or standard would be incorporated into the project:

- CALGreen (Title 24, Part 11)
- **NCZO Section 8106-8.7:** All commercial, industrial, institutional, or residential buildings having five or more living units, shall provide recycling and refuse storage areas in accordance with the County of Ventura's most recently adopted "Space Allocation for Recycling and Refuse Collection Design Criteria and Specifications Guidelines" in effect at the time of the development approval.
- **NCZO Section 8108-5.13:** At least 1 trash and 1 recyclables receptacle shall be provided for parking area users for the first 20 motor vehicle parking spaces, and 1 trash and 1 recyclables receptacle for every 80 spaces thereafter. Receptacles shall be enclosed to prevent access by animals and wind, placed in convenient, high-visibility locations, and serviced and maintained appropriately.
- **Ventura County Ordinance Code.** Section 4770 et seq. and Section 4773 et seq
- California Solid Waste Reuse and Recycling Access Act of 1991
- **2040 General Plan Policy WR-1.1. Sustainable Water Supply:** The County should encourage water suppliers, groundwater management agencies, and groundwater sustainability agencies to inventory and monitor the quantity and quality of the county's water resources, and to identify and implement measures to ensure a sustainable water supply to serve all existing and future residents, businesses, agriculture, government, and the environment.
- **2040 General Plan Policy WR-1.6. Water Supplier Cooperation:** The County shall encourage the continued cooperation among water suppliers in the county, through entities such as the Association of Water Agencies of Ventura County and the Watersheds Coalition of Ventura County, to ensure immediate and long-term water needs are met efficiently.

- **2040 General Plan Policy WR-1.11. Adequate Water for Discretionary Development:** The County shall require all discretionary development to demonstrate an adequate long-term supply of water.

## **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

### **Condition of Approval Number B-7: Sewer Service Certificate for Subdivisions**

The Permittee shall submit a project specific Sewer Service Certificate for Subdivisions to the Environmental Health Division (EHD).

### **Condition of Approval Number B-8: Water Supply Certificate for Subdivisions**

The Permittee shall submit a project specific Water Supply Certificate for Subdivisions to the Environmental Health Division (EHD) signed by the water purveyor.

### **Condition of Approval Number C-7: Landscaping and Screening**

The Permittee shall retain a landscape architect to prepare a landscape plan that complies with the requirements of this condition and the California Department of Water Resources Model Water Efficient Landscape Ordinance (MWELO).

### **Condition of Approval Number C-11: Trash and Recycling Storage Area**

The Permittee shall ensure that trash and waste diversion (e.g., recyclables and yard waste) enclosures are constructed and maintained on the project site in accordance with the County of Ventura's adopted *"Space Allocation for Recycling and Refuse Collection Design Criteria and Specifications Guidelines."*

### **Condition of Approval Number C-17: Undergrounding of All Electric, Cable, Phone, and Internet Lines**

Pursuant to General Plan Policy PFS-7.4, the undergrounding of all electric, cable, phone, and gas lines shall be required. The Permittee shall submit proposed grading and building plans denoting utility service lines to the Planning Division for review and approval.

### **Condition of Approval Number C-20: Drainage Plan**

The Permittee shall submit drainage plans and hydrologic and hydraulic calculations, which are prepared by a civil engineer registered in the State of California, to the Public Works Agency's Land Development Services Division for review and approval.

### **Condition of Approval Number C-21: All Improvements Required**

The Permittee shall be granted occupancy of a parcel only when the required project conditions have been completed and approved by the Public Works Agency.

### **Condition of Approval Number C-22: Waste Diversion and Recycling Requirement**

VCOC Section 4770-4 requires the Permittee to work with a County-franchised solid waste collection company which will determine the level of service required to divert recyclables and organic waste generated by their project from local landfills. For a complete list of County-franchised solid waste haulers, go to: <https://www.vcpbublicworks.org/wsd/iwmd/businessrecycling/#Collectors-Rates-Agreements>

**Condition of Approval Number C-23: Construction and Demolition Debris Recycling Plan**

The Permittee must submit a comprehensive recycling plan to the IWMD for any proposed construction and/or demolition projects that require a building permit, unless otherwise exempt under VCOC Section 4773-4.

**Condition of Approval Number C-24: Collection and Loading Areas for Refuse and Recyclables and Organic Waste**

The Permittee shall adhere to the Ventura County Space Allocation Guidelines which include minimum space requirements for refuse, recycling, and organic waste bins and recommend aesthetic, gated, trash enclosures. Please review the Ventura County Space Allocation Guidelines at: <https://publicworks.venturacounty.gov/wsd/iwmd/businessrecycling/#SpaceAllocation>

**Condition of Approval Number C-28: Will Serve Letter**

The Permittee shall confirm a permanent water supply for the project by obtaining a “Will Serve Letter” or “water service agreement” from the water service purveyor (City of Ventura).

## 20 Wildfire

### Summary of Findings

With regard to Wildfire, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. No mitigation measures were included within the 2040 General Plan EIR, and none would be required because project specific impacts would be less than significant.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate impacts to wildfire.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>20. Wildfire</b>						
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:						
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	GP EIR pp.4.9-19 to 4.9-24 Impact 4.9-6	No	No	No	No	N/A
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	GP EIR pp.4.9-19 to 4.9-24 Impact 4.9-6	No	No	No	No	Yes

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	GP EIR pp.4.9-19 to 4.9-24 Impact 4.9-6	No	No	No	No	Yes
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	GP EIR pp.4.9-19 to 4.9-24 Impact 4.9-6	No	No	No	No	Yes

## Discussion

### *a. Substantially impair an adopted emergency response plan or emergency evacuation plan?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would result in development that exacerbates the potential for wildfires to occur and substantially impairs an adopted emergency response plan or evacuation plan (Impact 4.9-6); these impacts were identified as potentially significant. The 2040 General Plan EIR identified that there are over 80 square miles of the county that are within the high FHSV or State Responsibility Area lands and more than 500 square miles in the VHFHSZ of Local Responsibility Area lands. The 2040 General Plan EIR identified that the only way to fully mitigate additional exposure of people to wildfire or exacerbation of wildfire risk is to prohibit all development in or near any areas that are at risk for wildfire and concluded no additional feasible policies or implementation programs are available to reduce the risk of wildfire exposure, exacerbation, or resulting adverse environmental effects to less than significant. The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and exacerbate wildfire risk because it would accommodate future development in or adjacent to fire hazard areas. These impacts were identified as significant and unavoidable.

The project site is located within a VHFHSZ. As discussed in detail in Section 9, *Hazards and Hazardous Materials*, a Wildfire Evacuation Study was prepared to study the potential for the project to result in evacuation-related impacts (Appendix I). The Wildfire Evacuation Study determined, under multiple scenarios, that available roadway capacity is sufficient to safely accommodate the anticipated number of evacuating vehicles in the project area with implementation of the project, and the project would



not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, project impacts related to emergency response and evacuation would be less than significant.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact related to the impairment of emergency response and evacuation plans due to future development in fire hazard areas. However, the project would include multiple emergency access points and would not substantially impede emergency evacuation in the project area, resulting in less than significant impacts related to emergency response and evacuation. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and exacerbate wildfire risk because it would accommodate future development in or adjacent to fire hazard areas (Impact 4.9-6). These impacts were identified as significant and unavoidable.

As discussed in Section 9, *Hazards and Hazardous Materials*, the project would not significantly exacerbate wildfire risks due to slope, prevailing winds, or other environmental factors, nor would it expose project occupants to significant risks from post-fire slope instability, flooding, or drainage changes. Although the site is located within a VHFHSZ and adjacent to terrain that could channel winds and intensify fire behavior, the project incorporates robust design measures including ignition-resistant construction, 200 feet of fuel modification zones, and fire-resistive landscaping (Appendix J). The project would also provide proper premise identification and ensure sufficient water supply for firefighting purposes (Condition of Approval Nos. B-14, C-30-C-33, C-36-C-39, C-42, C-43, C-48, and C-49). To support emergency response, the project would add a secondary gated access at Floral Drive for emergency responders and evacuation and install fire hydrants capable of meeting required fire flow and duration, and facilitate rapid hydrant location through appropriate signage (Condition of Approval Nos. C-40 and C-41). Fire risks associated with the project would be minimized through design measures aimed at reducing impacts on the community's fire protection system and lowering hazardous fuel loads around the development to enhance wildfire protection (Condition of Approval Nos. C-50 and C-51). Additionally, while surrounding slopes are susceptible to landslides and runoff following wildfire events, the project site itself is relatively flat and has recovered vegetation since the 2017 Thomas Fire, stabilizing soils. The project would adhere to geotechnical recommendations, including the recommended setbacks from the slopes in the eastern portion of the project site, grading standards, and drainage controls to prevent post-wildfire slope instability and flooding (Condition of Approval Nos. C-19 and C-20). Therefore, impacts would be less than significant.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact related to wildfire risk. The project would incorporate ignition-resistant construction, fuel modification zones, fire-resistive landscaping, and geotechnical and drainage controls that minimize wildfire-related risks, and impacts would be less than significant. Therefore, the project would be

consistent with the analysis within the 2040 General Plan EIR because it would not create new significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

- c. *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would exacerbate wildfire risk because it would accommodate future development in or adjacent to fire hazard areas (Impact 4.9-6). These impacts were identified as significant and unavoidable.

The project would require the installation and maintenance of infrastructure such as internal access roads, utilities, and fuel modification zones. Based on the Draft Fire Protection Plan prepared by Dudek in October 2025, while these activities involve ground disturbance and the use of heavy machinery which could temporarily increase ignition risk during construction, the project would include comprehensive fire safety protocols to minimize these risks (Appendix M). Vegetation management and fuel breaks would be required prior to and throughout construction (Condition of Approval Nos. C-49 and C-51), and no combustible materials may be brought on-site until utilities, fire hydrants, and approved access roads are in place per VCFD standards, the California Fire Code, and California the Building Code. Additionally, the fuel modification zones and access roads would be designed to enhance fire protection, with roads and driveways serving as fire breaks that would improve emergency access and support firefighting operations. Fire hydrants and water supply systems installed on the site would meet VCFD standards, and all structures will be equipped with automatic fire sprinklers (Condition of Approval Nos. B-14, C-39, C-40 and C-42). These measures would ensure that the installation and maintenance of infrastructure would not exacerbate wildfire risk or result in significant temporary or ongoing environmental impacts.

As discussed in Section 9, *Hazards and Hazardous Materials*, the project would comply with Section 8107-41.1 of the NCZO (Condition of Approval No. C-17) and ensure adequate fire department access in accordance with current California State Law, VCFD requirements, and applicable standards. It would also provide proper premise identification and ensure sufficient water supply for firefighting purposes (Condition of Approval Nos. B-14, C-30-C-33, C-36-C-39, C-43, C-48, and C-49). To support emergency response, the project would add a secondary gated access at Floral Drive for emergency responders and evacuation and install fire hydrants capable of meeting required fire flow and duration, and facilitate rapid hydrant location through appropriate signage (Condition of Approval Nos. C-40 and C-41). Fire risks associated with the project would be minimized through mitigation measures aimed at reducing impacts on the community's fire protection system and lowering hazardous fuel loads around the development to enhance wildfire protection (Condition of Approval Nos. C-50 and C-51). Additionally, the County would furnish the applicant with a list of all applicable fire department requirements. The project would maintain emergency access and public safety throughout phased construction (Condition of Approval Nos. C-52 and C-53). With compliance with these policies and conditions of approval, project impacts related to the exacerbation of wildfire risk would be less than significant.

As previously discussed, the 2040 General Plan EIR identified a significant and unavoidable impact related to wildfire risk. The project would include comprehensive fire safety measures, such as ignition-resistant construction, fuel modification zones, and fire protection infrastructure designed to meet VCFD standards, and would result in less than significant impacts. Therefore, the project would be consistent with the analysis within the 2040 General Plan EIR because it would not create new

significant impacts or increase the severity of previously identified significant impacts as a result of substantial new information that was not known when the 2040 General Plan EIR was certified.

### **Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

The 2040 General Plan EIR did not include mitigation measures related to wildfire. The following uniformly applied development policies and standards would be incorporated into the project:

- Ventura County Fire Department Codes
- Ordinances, and Standards
- California Building Code
- California Fire Code

### **Conditions of Approval and Impact Minimization Measures**

The project would incorporate the following conditions of approval and impact minimization measures to further minimize impacts:

#### **Condition of Approval Number B-14: Water Mains (Land Divisions)**

The Permittee shall design water mains capable of providing a fire flow of 2,000 gallons per minute at 20 psi and a minimum two-hour duration. The water mains shall be installed from the public right-of-way, or from the purveyor's point of connection to the property line east of Parcel No. 063-0-110-090.

#### **Condition of Approval Number C-17: Undergrounding of All Electric, Cable, Phone, and Internet Lines**

Pursuant to General Plan Policy PFS-7.4, the undergrounding of all electric, cable, phone, and gas lines shall be required. The Permittee shall submit proposed grading and building plans denoting utility service lines to the Planning Division for review and approval.

#### **Condition of Approval Number C-19: Grading Permit**

The Permittee shall submit a grading plan showing existing and proposed elevations to the Public Works Agency's Land Development Services Division for review and approval. If a grading permit is required, a civil engineer registered in the State of California must prepare and submit the grading plans, geotechnical and hydrology reports as necessary, to Land Development Services Division for review and approval. The Permittee must post sufficient surety in order to ensure proper completion of the proposed grading.

#### **Condition of Approval Number C-20: Drainage Plan**

The Permittee shall submit drainage plans and hydrologic and hydraulic calculations, which are prepared by a civil engineer registered in the State of California, to the Public Works Agency's Land Development Services Division for review and approval.

#### **Condition of Approval Number C-30: Private Access Road Design**

The Permittee shall design all new private roads in accordance with Public Road Standards and any additional design requirements outlined in the conditions of approval for the project below, unless modified by the Fire District. All required Fire Access Roads and Driveways, along with cross section(s), shall be shown on the final map or parcel map.

**Condition of Approval Number C-31: Projects Having More Than 100 Dwelling Units or 200 Guest Rooms**

The Permittee shall design the project such that multiple-family residential projects having more than 100 dwelling units or more than 200 guest rooms or a combination thereof, are provided throughout the project with two separate and approved fire apparatus access roads, including secondary access to the site. Access roadways within the project and serving 24 dwelling units or 48 guest rooms may not exceed 400 feet dead-end length.

**Condition of Approval Number C-32: Access Road Certification**

The Permittee shall have all access road(s)/driveway(s) certified by a registered Civil Engineer as having an all-weather surface in conformance with Public Works and / or Fire District Standards.

**Condition of Approval Number C-33: Fire Lanes**

The Permittee shall post all fire lanes in accordance with California Vehicle Code, the International Fire Code and current Ventura County Fire Department Fire Lane Standards. All fire lane markings / signs shall be located within recorded access easements. The Permittee shall maintain all required fire lane markings / signs to be clearly visible.

**Condition of Approval Number C-36: Private Road/Driveway Maintenance Agreement and Fund**

The Permittee shall execute a Road Maintenance Agreement to ensure continuous access by fire apparatus. A Road Maintenance Agreement shall be entered into and be binding on all owners of any parcel within the development. The maintenance agreement shall include all access road improvements (including surfacing, drainage control, vertical clearance, hazard abatement and signs / markings) for this development. On-going road maintenance shall be performed as required to maintain the road and at any time as requested by the Fire Department. The road maintenance agreement shall be approved by the Fire District. This condition can be satisfied by inclusion within a Homeowners or Property Owners Association (HOA / POA) CC&Rs and dues assessments. If included within CC&R's, an overriding statement shall be included that indicating that access road maintenance requirements and funding provisions shall not be revised or eliminated without written approval of the Fire District

**Condition of Approval Number C-37: Access Road Gates**

The Permittee shall design and install all gates along required fire access roads/driveways consistent with Fire Protection District Standards.

**Condition of Approval Number C-38: Walk and Pedestrian Gates**

The Permittee shall provide a Knox System on all walk / pedestrian gates serving the project area.

**Condition of Approval Number C-39: Fire Flow**

The Permittee shall verify that the water purveyor can provide the required volume and duration at the project. The minimum required fire flow shall be determined as specified by the current adopted edition of the Ventura County Fire Code and the applicable Water Manual for the jurisdiction (whichever is more restrictive). Given the present plans and information, the required fire flow is approximately 2,000 gallons per minute at 20 psi for a minimum two hour duration. A minimum flow of 1,000 gallons per minute shall be provided from any one hydrant. Note: For Commercial, Industrial, Multi-family buildings, a minimum fire flow of 1,000 GPM shall be provided from each hydrant when multiple hydrants are flowing at the same time.

**Condition of Approval Number C-40: Fire Hydrant(s)**

The Permittee shall provide fire hydrant(s) per the current adopted edition of the Ventura County Fire Code, Appendix C. Design and installation shall conform to the minimum standard of the Ventura County Water Works Manual.

**Condition of Approval Number C-41: Hydrant Location Markers**

The Permittee shall install blue reflective fire hydrant location markers on the access road per Ventura County Fire Department Standards.

**Condition of Approval Number C-42: Fire Sprinklers**

The Permittee shall be responsible to have an automatic fire sprinkler system installed in all structures as required by the VCFD. The fire sprinkler system shall be designed and installed by a properly licensed contractor under California State Law.

**Condition of Approval Number C-43: Fire Alarm**

The Permittee shall be responsible to have a fire alarm system installed in all structures. The fire alarm system shall be designed and installed by a properly licensed contractor under California State Law.

**Condition of Approval Number C-48: Hazardous Fire Area**

The Permittee shall construct all structures to meet hazardous fire area building code requirements.

**Condition of Approval Number C-49: Hazard Abatement**

In lieu of the additional access separation an additional 100-foot brush mitigation measure is required, for a total of 200 feet of brush clearance overall-the first 100 feet is regular brush clearance and the remaining 100 feet being a fuel modification thinning zone from the buildings as a buffer where the wildfire threat is located. Conservation Parcel-Option A -provide an easement for the additional brush clearance area specifically identified as a brush clearance modification zone per VCFD Standards. Indicate and call out this area on the proposed map and provide in all documents to be recorded. Option B-Adjust the parcel line to incorporate the fuel modification zone of 200 feet to be located within the entirety of the existing parcel where the buildings are to be located.

**Condition of Approval Number C-50: Fire Protection Plan**

The Permittee shall prepare a Fire Protection Plan (FPP). The FPP shall be prepared by a qualified fire protection consultant as approved by the Ventura County Fire Department. The Permittee, all land owners and any tenants shall abide by the approved FPP.

**Condition of Approval Number C-51: Fuel Modification Plans**

The Permittee shall prepare a Fuel Modification Plan (FMP).

**Condition of Approval Number C-52: Fire Department Clearance**

The Permittee shall obtain VCFD Form 610B "Requirements for Construction" for any new structures or additions to existing structures before issuance of building permits.

**Condition of Approval Number C-53: Phasing Plan**

The Permittee shall submit a phasing plan indicating phases, material staging locations and employee parking areas.

## 21 Mandatory Findings of Significance

### Summary of Findings

With regard to Mandatory Findings, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the 2040 General Plan EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the 2040 General Plan EIR.
4. Mitigation measures identified in the 2040 General Plan EIR would be applicable.
5. Uniformly applied development policies or standards and conditions of approval would be incorporated to mitigate impacts related to Mandatory Findings.

Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
<b>21. Mandatory Findings of Significance</b>						

Would the project:

a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	GP EIR Sections 4.4, Biological Resources, and 4.5, Cultural, Tribal, and Paleontological Resources	No	No	No	No	Yes
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Environmental Issue Area	Where Was Impact Analyzed in General Plan EIR?	Any Peculiar Impact Not Analyzed as Significant Effect in General Plan EIR?	Any Impact Not Analyzed As Significant Effect in General Plan EIR	Any Significant Off-Site or Cumulative Impact Not Analyzed in General Plan EIR?	Any Previously Identified Significant Impact More Severe due to Substantial New Information?	Do EIR Mitigation Measures or Uniformly Applied Development Policies or Standards Substantially Mitigate Impacts?
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	GPEIR Chapter 5	No	No	No	No	Yes
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	GP EIR Sections 4.3, Air Quality, and 4.13, Noise and Vibration	No	No	No	No	Yes

## Discussion

- a. *Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

Consistent with the findings of the 2040 General Plan EIR and as discussed in Section 4, *Biological Resources*, with incorporation of mitigation measures consistent with the 2040 General Plan EIR, uniformly applied standards and policies, and conditions of approval related to nesting birds and heritage trees, the project would not substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife species population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed in Section 5, *Cultural Resources*, Section 8, *Geologic Hazards and Paleontological Resources*, and Section 18, *Tribal Cultural Resources*, with incorporation of mitigation measures consistent with the 2040 General Plan EIR, uniformly applied standards and policies, and conditions of approval related to the unanticipated discovery of cultural and paleontological resources, the project would not eliminate important examples of the major periods of California history or prehistory, including archaeological, paleontological resources, or tribal cultural resources. As such, this impact would be less than significant with mitigation and would not be substantially greater than those identified in the 2040 General Plan EIR.

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

Required conformance with 2040 General Plan policies and mitigation measures, uniformly applied standards and policies, and conditions of approval specified in this document would ensure that potential impacts are individually limited and not cumulatively considerable in the context of impacts associated with other pending and planned development projects. As part of the 2040 General Plan EIR, cumulative impacts associated with buildout of the 2040 General Plan were analyzed. The development of farmworker housing was envisioned and studied in the 2040 General Plan EIR, and were considered as part of the cumulative impact analysis. Other existing and allowable land uses near the project site have not changed significantly since completion of the cumulative analysis in the 2040 General Plan EIR. The 2040 General Plan is a document that establishes a land use scenario and goals, policies, and objectives for development and growth throughout the county through the year 2040. Thus, the impact analyses in the 2040 General Plan EIR effectively constitute cumulative analyses of the approved land uses in the planning boundaries. The project would not result in significant impacts peculiar to the project site, as indicated in Sections 1 through 20 above. Nearby future development would be required to be consistent with the local planning documents or would be required to assess the impacts that were not addressed in the 2040 General Plan EIR. Therefore, the project’s consistency with the 2040 General Plan and subsequent analysis above in Sections 1 through 20 indicate that the project would not result in significant cumulative impacts that were not addressed in the 2040 General Plan EIR. As such, this impact would be less than significant with mitigation and would not be substantially greater than those identified in the 2040 General Plan EIR.

- c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

In general, impacts to human beings are associated with air quality, geology and soils, greenhouse gas emissions/climate change, hazards and hazardous materials, noise, traffic safety, and wildfire. As detailed in the preceding sections, the project would not result, either directly or indirectly, in substantial adverse impacts related to these issue areas. As discussed in Section 3, *Air Quality*, the project’s effects on air quality would be less than significant with incorporation of mitigation measures contained in the 2040 General Plan EIR and compliance with uniformly applied standards, policies, and conditions of approval related to construction. As discussed in Section 7, *Geologic Hazards and Paleontological Resources*, the project’s effects to human beings related to geologic hazards would be less than significant with compliance with uniformly applied standards, policies, and conditions of approval related to site soil and seismic conditions. As described in Section 8, *Greenhouse Gas Emissions*, the project would incorporate sustainability features that align with the Ventura County CAP and other regional and statewide policies, and would result in less than significant impacts related to climate change. Compliance with existing regional, state and local policies and conditions of approval during project construction and operation would ensure the project would not result in hazards to people related to hazardous materials and contamination, as discussed in Section 9, *Hazards and Hazardous Materials*. The generation of noise and vibration from construction and operational activity, as discussed in Section 13, *Noise and Vibration*, would be less than significant. As stated in Section 17, *Transportation and Traffic*, the project would comply with uniformly applied standards, policies, and conditions of approval related to roadway and site access design, ensuring significant transportation hazards would not occur. Lastly, as discussed in Section 20, *Wildfire*, the project would implement fire safety design measures in accordance with uniformly



applied standards, policies, and conditions of approval, and would not result in significant impacts related to wildfire risk and evacuation. Therefore, the project would not have substantial direct or indirect adverse effects on human beings. Impacts would be less than significant with mitigation and would not be substantially greater than those identified in the 2040 General Plan EIR.

**Applicable Mitigation Measures or Uniformly Applied Development Policies or Standards**

The mitigation measures and uniformly applied development policies and standards listed in Sections 1 through 20 would be applied to minimize impacts.

**Conditions of Approval and Impact Minimization Measures**

The conditions of approval and impact minimization measures listed in Sections 1 through 20 would be applied to minimize impacts.

## List of Preparers

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Rincon Consultants, Inc. prepared this CEQA Guidelines Section 15183 Checklist under contract to the County of Ventura. Persons involved in data gathering analysis, project management, and quality control are listed below.

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