Somis Ranch Farmworker Housing Complex

Draft Environmental Impact Report

prepared by

Ventura County Resources Management Agency
Planning Division
800 South Victoria Avenue, L# 1740
Ventura, California 93009
Contact: Justin Bertoline, Senior Planner

prepared with the assistance of

Rincon Consultants, Inc.
180 North Ashwood Avenue
Ventura, California 93003

September 2020

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Environmental Scientists | Planners | Engineers
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Executive Summary

This Executive Summary is provided in accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15123. It contains an overview of the programmatic analysis of the proposed Somis Ranch Farmworkers Housing Complex (herein referred to as "proposed project" or "project"). As stated in CEQA Guidelines Section 15123(a), "[a]n [Environmental Impact Report (EIR)] shall contain a brief summary of the proposed actions and its consequences. The language of the summary should be as clear and simple as reasonably practical." CEQA Guidelines Section 15123(b) states, "[t]he summary shall identify: (1) each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; (2) areas of controversy known to the Lead Agency, including issues raised by agencies and the public; and (3) issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects." Accordingly, this summary includes a brief synopsis of the project and identified plan alternatives, environmental impacts and mitigation, areas of known controversy, and issues to be resolved during environmental review. Table ES-1 (at the end of this section) summarizes potential environmental impacts from implementation of the project, mitigation measures that could reduce significant impacts, and the levels of significance following the implementation of mitigation measures.

Project Applicant

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Project Location

The approximately 36.4-acre project site is located 2789 Somis Road on Assessor Parcel Number (APN) 156-0-180-48 in unincorporated Ventura County. The project site is situated just north of the intersection of Somis Road/Las Posas Road, immediately north of and adjacent to the City of Camarillo (City), and outside the City's sphere of influence and the Camarillo Urban Restriction Boundary (CURB). The project site is currently predominantly used for agricultural production. The project site also currently contains two residences and ancillary agricultural buildings located immediately south of Bell Ranch Road. An unpaved road provides access to the project site from Somis Road. The existing residential area covers approximately 2.7 acres (seven percent) of the project site.

The project site is regionally accessible from U.S. Highway 101 and locally accessible from the south via State Route (SR) 34 (i.e., North Lewis Road, which turns into Somis Road when traveling north from U.S. Highway 101) or from the north via SR 118 (i.e., East Los Angeles Avenue) to Somis Road.

Project Description

This EIR has been prepared to examine the potential environmental effects of the proposed project. The following is a summary of the full project description, which can be found in Section 2, *Project Description*.

The approximately 36.4-acre project site is located 2789 Somis Road on Assessor Parcel Number (APN) 156-0-180-48. The project site is situated just north of the intersection of Somis Road/Las Posas Road, immediately north of and adjacent to the City of Camarillo (City), and outside of the City's sphere of influence and the Camarillo Urban Restriction Boundary (CURB).

The project site has a General Plan land use designation of Agricultural (County of Ventura [County] 2019) and the zoning designation of the site is AE (Agricultural Exclusive), which has a 40-acre minimum lot size (County 2020).

Project Characteristics

The proposed project would involve the construction and operation of an affordable multi-family housing complex for farmworkers (housing complex) on three proposed parcels totaling 18.43 acres and the continuation of agricultural use on a 17.93-acre continued agricultural use parcel. The proposed housing complex would include 360 dwelling units (apartments) and associated amenities. The project also would include the construction of a community wastewater treatment facility (CWWTF), which would serve the proposed housing complex and produce recycled water for irrigation of adjacent agricultural fields. The proposed project would not involve demolition or alteration of the existing on-site residences and agricultural buildings.

Housing Complex

The proposed 360-unit housing complex would include a variety of one-, two-, and three-bedroom apartments, as well as associated amenities such as community centers, play fields, tot lots/playgrounds, a basketball court, a community garden area, and a network of meandering pedestrian walkways. The majority of the apartment buildings would be three stories in height, with a maximum building height of 35.0 feet from ground level. The architectural style of the residential buildings would be "Spanish Colonial."

The proposed project would provide 655 parking spaces, 19 of which would be designated as accessible spaces. In addition, 379 bike parking spaces would be available throughout the complex.

Community Wastewater Treatment Facility

The proposed housing complex would include a CWWTF on an approximately 5,000- to 7,000-square-foot area in the northwest corner of the project site. The proposed CWWTF would include a conventional membrane bioreactor package and would treat all wastewater generated by the housing complex. The CWWTF would be designed to treat wastewater (sewage) generated by the housing complex to tertiary treatment standards. The Ventura Regional Sanitation District would be responsible for operation of the CWWTF.

Treated wastewater effluent, referred to as "recycled water," would be beneficially reused for off-site agricultural irrigation. The project site is situated adjacent to approximately 70 acres of orchards. Currently, the adjacent orchards are irrigated with relatively low-quality groundwater pumped from a private well. If the proposed project is approved and built, higher-quality recycled water generated by the CWWTF would be blended with pumped groundwater to improve the quality of agricultural irrigation water. Excess recycled water and treated wastewater effluent not meeting recycled water quality standards would be dispersed through a series of underground seepage pits along the western boundary of the housing complex.

Continued Agricultural Use Parcel

Under the proposed project, the eastern portion of the project site would continue to operate as an agricultural field for crops on a 17.93-acre continued agricultural use parcel. The proposed project would not result in any physical changes to the continued agricultural use parcel.

Construction

The housing complex would be constructed in three phases: Phase 1 would include 100 units, Phase 2 would include 100 units, and Phase 3 would include 160 units. The CWWTF would be constructed as part of Phase 1 and would be expanded to accommodate the needs of the housing complex as additional apartments are constructed during Phases 2 and 3.

Construction of Phase 1 is anticipated to begin in August 2021. Phases 2 and 3 would be constructed as needed, once the previous phase of the housing complex is occupied. Construction of Phases 1, 2, and 3 of the housing complex is expected to take approximately eight, six, and eight months, respectively.

Construction activities across Phases 1, 2, and 3 would require approximately 1,500 cubic yards (cy) of cut soil and 35,100 cy of fill soil, resulting in the import of approximately 33,600 cy of soil to the project site. No soil export would be necessary. Construction staging and construction work parking would occur on the project site.

Project Objectives

The objectives of the proposed project are as follows:

1. Develop a financially viable affordable residential community for lower-income farmworkers and their families in Ventura County to accommodate broad market needs.
2. Provide affordable housing units for farmworkers that will help meet the identified need assigned to Ventura County pursuant to California State Law and adopted in the County's Housing Element.
3. Support the local agricultural industry by providing local farmworker housing proximate to agricultural operations in Ventura County.
4. Provide a variety of apartment sizes to meet various family sizes.
5. Arrange the proposed apartment buildings and on-site amenities in a manner that is logical and promotes efficient use of the housing complex property.
6. Provide recreational opportunities for future project residents with on-site play fields, tot lots/playgrounds, active recreation opportunities, a community garden area, meeting rooms, and a network of meandering pedestrian walkways.

7. Minimize proposed building footprints and other impervious surfaces to accommodate on-site landscaped common space for future project residents.
8. Design an efficient internal circulation system that is safe for pedestrians and bicyclists.
9. Locate affordable housing in a location that provides convenient access to nearby services such as library, schools, commercial centers, and religious institutions.
10. Develop the project site in a manner that would not adversely affect neighboring land uses or infrastructure, including with regard to:
    - □ Water and sanitation services;
    - □ Land use compatibility; and
    - □ The scale of the project.
11. Develop the project site in a manner that would minimize affects from neighboring land uses to the proposed housing complex and future project residents.
12. Avoid modification to the existing Bell Ranch residences and agricultural buildings.

Alternatives

As required by CEQA, this EIR examines alternatives to the proposed project. Studied alternatives include the following two alternatives:

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Footprint Alternative

Under the No Project Alternative, there would be no change to the project site. Existing agricultural operations would continue. The No Project Alternative would be the overall environmentally superior alternative because it would result in no impact or less than significant impacts to all environmental issues and would avoid all project impacts. However, the No Project Alternative would not fulfill Project Objectives 1 through 12. This alternative would not provide affordable housing for farmworkers in Ventura County.

Alternative 2 (Reduced Footprint) would generate impacts similar to or reduced in comparison to the proposed project. Nevertheless, this alternative would not avoid the project's significant and unavoidable impacts to agricultural resources, as development of a housing complex would still require the conversion of Prime Farmland and Farmland of Statewide Importance to nonagricultural use. After the No Project Alternative, Alternative 2 would be considered the environmentally superior alternative.

Areas of Known Controversy

During the EIR scoping process, several members of the general public voiced concern regarding potential impacts associated with traffic, noise, school capacity, and preservation of agricultural lands. Responses to the Notice of Preparation of a Draft EIR and input received at the EIR scoping meeting held by the County are summarized in Section 1, *Introduction*.

Issues to be Resolved

The proposed project would require the discretionary approval of the County of Ventura. The Planning Commission is the decision-maker for the requested Tentative Parcel Map (TPM) and Planned Development Permit (PD Permit) and the Board of Supervisors is the decision-maker for the requested Conditional Use Permit (CUP) for the CWWTF. Construction would require grading permits. The CWWTF would require system construction permitting, plumbing, electrical, and structural permits and approvals. In addition, various access and utilities easements would be required.

The proposed CWWTF would also require water reclamation requirement (WRR) and waste discharge requirement (WDR) permits and approval to construct from the Los Angeles Regional Water Quality Control Board and California State Water Resources Control Board.

Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. Mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure(s)	Residual Impact
Air Quality		
Impact AQ-1. Emissions associated with project construction would be less than significant. However, because reactive organic compounds (ROC) and nitrogen oxides (NO_X) emissions would exceed 25 pounds per day, implementation of Mitigation Measure AQ-1 is recommended.	**AQ-1. ROC and NO_X Construction Reduction Measures.** Per the VCAPCD Guidelines, when construction emissions exceed 25 pounds per day for ROC and NO_X, the following measures shall be implemented: ▪ Minimize equipment idling time. ▪ Maintain equipment engines in good condition and in proper tune as per manufacturers' specifications. ▪ Lengthen the construction period during smog season (May through October) to minimize the number of vehicles and equipment operating at the same time. ▪ Use alternatively fueled construction equipment, such as compressed natural gas, liquefied natural gas, or electric, if feasible. ▪ In addition, per recent VCAPCD guidance on other projects, project construction shall use Tier 3 or above construction equipment for all off-road diesel equipment that has greater than 50 horsepower. A copy of each unit's certified tier specification shall be provided at the time of mobilization of each applicable unit of equipment.	Less than significant
Impact AQ-2. Air pollutant emission impacts associated with project operation would be less than significant.	None required	Less than significant
Impact AQ-3. The project would not expose sensitive receptors to substantial pollutant concentrations from carbon monoxide (CO) hotspots, valley fever, or toxic air contaminants (TACs). Impacts would be less than significant.	None required	Less than significant
Impact AQ-4. Implementation of the project would not create objectionable odors that could affect a substantial number of people. Impacts would be less than significant.	None required	Less than significant
Impact AQ-5. The project would be consistent with applicable Ventura County General Plan goals and policies. Impacts would be less than significant.	None required	Less than significant

Impact	Mitigation Measure(s)	Residual Impact
Agricultural Resources – Soils		
Impact AG-1. The project would result in the direct loss of 18.2 acres of Prime Farmland or Farmland of Statewide Importance to nonagricultural use. No feasible mitigation is available to reduce this impact to a less than significant level; therefore, the impact due to loss of Prime Farmland and Farmland of Statewide Importance soils would be significant and unavoidable.	There is no feasible mitigation currently available.	Significant and unavoidable
Impact AG-2. The project would not require a General Plan amendment. Therefore, no impact would occur.	None required	No impact
Impact AG-3. The project would be consistent with applicable Ventura County General Plan goals and policies. Impacts would be less than significant.	None required	Less than significant
Biological Resources		
Impact BIO-1. The project would result in no direct or indirect impacts to special-status plant or wildlife species due to the disturbed nature of the project site. No protected trees occur within the project construction footprint; therefore, no protected trees would be impacted. Regulatory compliance would protect nesting bird species during project construction. Impacts would be less than significant.	None required	Less than significant
Impact BIO-2. The project would not impact any sensitive plant communities. Potential indirect impacts to sensitive plant communities from dust during project construction would be less than significant.	None required	Less than significant
Impact BIO-3. Impacts to potentially jurisdictional waters/wetlands within the biological study area would be significant.	**BIO-3. Jurisdictional Waters Mitigation Plan.** The project applicant shall restore herbaceous wetland communities temporarily impacted by project activities, including Giant Scouring Rush and Bermuda Grass – Italian Wild Rye plant communities, at a minimum 1:1 mitigation to impact ratio (estimated at 0.09 acre total based on current design). The project applicant shall contract with a County-approved qualified biologist to prepare a Mitigation Plan that must include restoring these impacted communities occurring in the wetland features within the construction footprint. Planting palettes shall approximate existing species composition, except that non-native species such as Bermuda grass shall not be planted. The Mitigation Plan shall include, but not be limited to, the following components:	Less than significant

Impact	Mitigation Measure(s)	Residual Impact
	▪ A description of the purpose and goals of the mitigation plan, including the improvement of specific physical, chemical, and/or biological functions at the mitigation site. ▪ A description of the plant community type(s) and amount(s) that shall be provided by the mitigation and how the mitigation method shall achieve the mitigation project goals. ▪ A plant palette and methods of salvaging, propagating, and planting the site to be restored. ▪ Methods of soil preparation. ▪ Method and timing of irrigation. ▪ Best Management Practices (BMPs) that shall be utilized to avoid erosion and excessive runoff before plant establishment. ▪ Maintenance and monitoring necessary to ensure that the restored plant communities meet the success criteria. ▪ Schedule for restoration activities, including weed abatement, propagating and planting, soil preparation, irrigation, erosion control, qualitative and quantitative monitoring, and reporting to the County. ▪ Identification of measurable performance standards for each objective to evaluate the success of the compensatory mitigation. ▪ Identification of contingency and adaptive management measures to address unforeseen changes in site conditions or other components of the mitigation project. The Jurisdictional Waters Mitigation Plan shall provide for monitoring to be conducted for five years or until the performance criteria are met, whichever occurs sooner. The success criteria are as follows: ▪ The mitigation site shall attain a native percent cover that reflects that of the target communities occurring in unimpacted reference sites; ▪ Non-native species shall comprise less than five percent cover and zero percent cover of species listed as “High” on the California Invasive Plant Council’s Invasive Plant Inventory Database (or its successor); and	

Impact	Mitigation Measure(s)	Residual Impact
	▪ Irrigation of the native plantings shall cease no later than the end of the third year of restoration monitoring.	
Impact BIO-4. No direct impact to local or regional wildlife movement or habitat connectivity would occur. Indirect impacts associated with intimidation of wildlife would be less than significant.	None required	Less than significant
Impact BIO-5. The project would be consistent with applicable Ventura County General Plan goals and policies. Impacts would be less than significant.	None required	Less than significant
Cultural Resources – Historical		
Impact CUL-1. The project would not demolish, relocate, or alter in an adverse manner the physical characteristics of historical resources on the project site. Impacts to historical resources would be less than significant.	None required	Less than significant
Impact CUL-2. The project would be consistent with applicable Ventura County General Plan goals and policies. Impacts would be less than significant.	None required	Less than significant
Noise and Vibration		
Impact. N-1. Construction noise and stationary noise and off-site traffic noise from operation of the project would not exceed Ventura County standards at the nearby noise-sensitive receptors. Impacts would be less than significant.	None required	Less than significant
Impact N-2. Project-related vibration would not result in excessive ground-borne vibration or noise. Impacts would be less than significant	None required	Less than significant
Impact N-3. The project would be consistent with applicable Ventura County General Plan goals and policies. Impacts would be less than significant.	None required	Less than significant
Public Health		
Impact PH-1. Operation of the CWWTF would require routine transport, storage, use, and disposal of hazardous materials for purposes of treatment of wastewater and solids. Facility operation would be subject to existing and future federal, State, and local health and safety requirements, including those established for the handling, storage, transportation, and disposal of hazardous materials. Therefore, impacts would be less than significant.	None required	Less than significant

Impact	Mitigation Measure(s)	Residual Impact
Impact PH-2. The CWWTF would treat wastewater to tertiary treatment standards and produce recycled water for agricultural irrigation. Excess recycled water and treated wastewater effluent from the CWWTF not meeting recycled water quality standards would be dispersed through a series of underground seepage pits. Regulatory compliance would minimize public health risks associated with recycled water use and effluent dispersal. Impacts would be less than significant.	None required	Less than significant
Impact PH-3. The project would be consistent with applicable Ventura County General Plan goals and policies. Impacts would be less than significant.	None required	Less than significant
Transportation		
Impact T-1. Implementation of the project would not result in a substantial increase in vehicle miles traveled (VMT) because the project would provide 100 percent affordable residential units and would be consistent with the County NCZO farmworker employment criteria. Therefore, this impact would be less than significant.	None required	Less than significant
Impact T-2. The project would not modify or otherwise impact the design of any public roads or intersections. Therefore, this impact would be less than significant.	None required	Less than significant
Impact T-3. Implementation of the project would not modify or block existing or planned pedestrian/bicycle facilities or otherwise have an adverse impact on existing pedestrian or bicycle facilities. Therefore, this impact would be less than significant.	None required	Less than significant
Impact T-4. The project's affordable farmworker housing would not interfere with existing bus transit facilities or routes or create a substantial increase in demand for additional or new bus transit facilities/services. Therefore, this impact would be less than significant.	None required	Less than significant
Impact T-5. The project would be consistent with applicable Ventura County General Plan goals and policies. Impacts would be less than significant.	None required	Less than significant

Impact	Mitigation Measure(s)	Residual Impact
Waste Treatment and Disposal Facilities – Solid Waste Facilities		
SW-1. The CWWTF design would be subject to review by and approval from the Environmental Health Division of the County's Resource Management Agency. The project would comply with applicable state and local requirements as set forth in the County's Initial Study Assessment Guidelines. Impacts would be less than significant.	None required	Less than significant
Impact SW-2. The project would be consistent with applicable Ventura County General Plan goals and policies. Impacts would be less than significant.	None required	Less than significant
Water Resources – Surface Water Quality		
Impact WQ-1. Construction and operation of the proposed project would increase contaminants in stormwater runoff due to ground disturbance and changes in ground cover. However, with regulatory compliance, project impacts to surface water quality from construction and operation of the project would be less than significant.	None required	Less than significant
Impact WQ-2. Recycled water would be produced at the CWWTF and blended with local groundwater supplies for agricultural irrigation uses. The incorporation of recycled water into the area's existing agricultural irrigation uses would result in improved quality of the applied irrigation water, which would result in improved surface water quality in the area. With regulatory compliance, the project's impacts to surface water quality would be less than significant.	None required	Less than significant
Impact WQ-2. The project would be consistent with applicable Ventura County General Plan goals and policies. Impacts would be less than significant.	None required	Less than significant
Land Use and Planning		
LU-1. The project would be consistent with applicable Ventura County General Plan goals and policies for air quality. Impacts would be less than significant.	None required	Less than significant
LU-2. The project would be consistent with applicable Ventura County General Plan goals and policies for agricultural resources related to soils. Impacts would be less than significant.	None required	Less than significant

Impact	Mitigation Measure(s)	Residual Impact
LU-3. The project would be consistent with the County's Save Open Space and Agricultural Resources (SOAR) Ordinance. Impacts would be less than significant.	None required	Less than significant
LU-4. The project would be consistent with applicable Ventura County General Plan goals and policies for biological resources. Impacts would be less than significant.	None required	Less than significant
LU-5. The project would be consistent with applicable Ventura County General Plan goals and policies for historic cultural resources. Impacts would be less than significant.	None required	Less than significant
LU-6. The project would be consistent with applicable Ventura County General Plan goals and policies for noise and vibration. Impacts would be less than significant.	None required	Less than significant
LU-7. The project would be consistent with applicable Ventura County General Plan goals and policies for public health. Impacts would be less than significant.	None required	Less than significant
LU-8. The project would be consistent with applicable Ventura County General Plan goals and policies for transportation. Impacts would be less than significant.	None required	Less than significant
LU-9. The project would be consistent with applicable Ventura County General Plan goals and policies for solid waste facilities. Impacts would be less than significant.	None required	Less than significant
LU-10. The project would be consistent with applicable Ventura County General Plan goals and policies for surface water quality. Impacts would be less than significant.	None required	Less than significant
Other CEQA-Required Discussions		
Population growth associated with the proposed project would not cause the County to exceed Southern California Association of Governments' (SCAG) 2040 population forecast. The purpose of the project is to provide housing for current farmworkers in the County and, therefore, the project would not cause an exceedance in the regional population or employment growth forecasts. Impacts would be less than significant.	None required	Less than significant
The project would not use unusual amounts of energy or construction materials and impacts related to consumption of non-renewable and slowly renewable resources would be less than significant.	None required	Less than significant

1 Introduction

This document is an Environmental Impact Report (EIR) for the proposed Somis Ranch Farmworker Housing Complex (hereafter referred to as the "proposed project" or "project") located at 2789 Somis Road in unincorporated Ventura County, immediately north of the City of Camarillo (City). The proposed project would be constructed on a site currently used for agricultural production. The proposed project would involve the construction and occupation of an affordable multi-family housing complex for farmworkers (housing complex) on three proposed parcels totaling 18.43 acres and the continuation of agricultural use on a 17.93-acre continued agricultural use parcel. The proposed housing complex would include 360 dwelling units (apartments) and associated amenities. The project would also include construction of a community wastewater treatment facility (CWWTF), which would serve the proposed housing complex and produce recycled water for irrigation of adjacent agricultural fields. The proposed project would not involve demolition or alteration of the existing on-site residences and agricultural buildings.

This section discusses (1) the EIR background; (2) the legal basis for preparing an EIR; (3) the scope and content of the EIR; (4) the lead, responsible, and trustee agencies; and (5) the environmental review process required under the California Environmental Quality Act (CEQA). The proposed project is described in detail in Section 2, *Project Description*.

1.1 Environmental Impact Report Background

The County of Ventura distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on April 13, 2020 and ending on May 13, 2020. CEQA §21092(b)(3)(C) requires, as one of three options, "direct mailing to the owners and occupants of contiguous property shown on the latest equalized assessment roll" regarding distributing the NOP for an EIR. The NOP for this EIR was distributed on April 7, 2020 to the owners and occupants of parcels adjacent to the project site, as well as interested parties. The NOP was published in a local newspaper, VC Star, on April 13, 2020, including the notice of a public EIR Scoping Meeting to be held on April 22, 2020. The NOP was also posted at the Ventura County Resource Management Agency office, the Ventura County Clerk-Recorder office, and online at the Ventura County Resource Management Agency website.

The County held an EIR Scoping Meeting on April 22, 2020.[1] The meeting, held from 6:00 p.m. to 7:30 p.m., was aimed at providing information about the proposed project to members of public agencies, interested stakeholders, and residents/community members. The meeting was held remotely via Zoom webinar. The County received letters from 5 state, regional, and local agencies; 1 non-government organization; and 16 individuals in response to the NOP during the public review period, as well as various verbal comments during the EIR Scoping Meeting. The NOP is presented in Appendix A of this EIR, along with the NOP responses received. Table 1-1 and Table 1-2 summarize the content of the written and verbal comments and where the issues raised are addressed in the EIR.

[1] CEQA §21083.9 requires lead agencies to call scoping meetings for: (1) a proposed project that may affect highways or other facilities under the jurisdiction of the California Department of Transportation if the meeting is requested by the department, or (2) a project of statewide, regional, or areawide significance. The proposed project would not affect California Department of Transportation highways or other facilities, and is not a project of statewide, regional, or areawide significant. Nevertheless, a scoping meeting was held to collect public input.

1.2 Purpose and Legal Authority

The proposed project requires the discretionary approval of the County of Ventura; therefore, the project is subject to the environmental review requirements of CEQA. In accordance with Section 15121 of the CEQA Guidelines (California Code of Regulations [CCR] Title 14), the purpose of this EIR is to serve as an informational document that "will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

This EIR has been prepared as a project EIR pursuant to Section 15161 of the CEQA Guidelines. A Project EIR is appropriate for a specific development project. As stated in the CEQA Guidelines, "This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation."

This EIR serves as an informational document for the public and County of Ventura decision makers. The CEQA process will conclude with public hearings before the Planning Commission and the Board of Supervisors to consider certification of a Final EIR and approval of the proposed project.

Table 1-1 Agency Comments on the NOP and EIR Responses

Commenter	Comment/Request	Response/Where Comments are Addressed in the EIR
California Department of Fish and Wildlife (CDFW)	CDFW is a Responsible Agency under CEQA for the project for lake and streambed alteration regulatory authority and any species protected under the California Endangered Species Act.	CDFW have been identified as a responsible agency under Section 1.4, *Lead, Responsible, and Trustee Agencies*..
	Project activities during the bird breeding season could impact birds covered by the federal Migratory Bird Treaty Act (MBTA) and/or California Fish and Game Code. Suggestions mitigation measures for impacts to nesting birds.	See Section 4.3, *Biological Resources*, of the EIR.
	Project landscaping should avoid invasive/exotic plants.	
	A complete assessment and impact analysis of the flora and fauna within and adjacent to the project area should be conducted.	
	The Arroyo Las Posas River is an important riparian corridor in the vicinity of the project site that serves as an important wildlife movement corridor. A thorough discussion of direct, indirect, and cumulative impacts to biological resources should be included in the EIR.	
	If the project would result in potential take of a species listed or a candidate for listing under the California Endangered Species Act, the project would require an Incidental Take Permit for the CDFW prior to project construction.	
	The EIR should include mitigation measures for adverse impacts to sensitive plants, animals, and habitats.	
	For proposed preservation and/or restoration, the EIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity.	

Commenter	Comment/Request	Response/Where Comments are Addressed in the EIR
	Limit translocation and transplantation is discouraged as mitigation for impacts to sensitive plants and animals. To avoid direct mortality, it is recommended that a qualified biological monitor approved by CDFW be on-site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or construction activities.	
	The EIR should include a complete discussion of the proposed project and a range of feasible alternatives to avoid or otherwise minimize impacts to sensitive biological resources and wildlife movement areas.	See Section 2, *Project Description*, and Section 6, *Alternatives*, of the EIR.
City of Camarillo	The project should be evaluated to assure compatibility with surrounding land uses in the City and be designed to complement existing surrounding development. The EIR should consider the City's Community Design Element. In particular: ■ Residential areas should be compatible with surrounding land use and neighborhoods; ■ The Residential Design Guidelines should be reviewed for consistency; ■ Beatifying SR 34; ■ Identification of the intersection of SR 34/Los Posas Road/Upland Drive as a primary gateway into the City; and ■ Identification of SR 34 as a scenic corridor by the City.	The project site is within unincorporated Ventura County; therefore, the project is not required to comply with City of Camarillo design policies.
	The EIR should address construction noise at Rancho Campana High School and the Camarillo Public Library.	See Section 4.5, *Noise and Vibration*, of the EIR.
	The EIR should address safety and security related to the adjacent City's Desalter Facility.	Safety and security issues for the City's Desalter Facility should be included in the CEQA documentation for the Desalter Facility. Which is currently under construction.
	The project site plan does not include an agricultural buffer at the southeast corner of the project housing complex.	An agricultural buffer is not required between non-agricultural land uses. See Section 2, *Project Description*, of the EIR for the landscape plan, which shows landscaping between the project housing complex and the City's Desalter Facility.

Commenter	Comment/Request	Response/Where Comments are Addressed in the EIR
	The EIR should address security and fencing between the proposed project and the adjacent high school and City's Desalter Facility.	See Section 2, *Project Description*, of the EIR for the project site plan and landscape plan. A 29-foot-wide landscaped buffer is proposed to the north, west, and east of the proposed housing complex. Security is not an environmental issue under CEQA.
	The EIR should address transportation routes and modes of transportation for the proposed project. Ensure that the two access project driveways along Somis Road are not too close together and are acceptable for emergency access. Include traffic signals as necessary.	See Section 4.7, *Transportation*, of the EIR.
	The project must include the minimum state requirements with regard to off-street parking spaces.	See Section 2, *Project Description*, of the EIR.
	The project cannot connect to the Calleguas Municipal Water District's Salinity Management Pipeline (SMP) brine line.	See Section 4.9, *Water Resources – Surface Water Quality*, of the EIR.
	Provide a copy of Appendix A of the Supplemental Information & Project Description by Jensen Design & Survey. Provide copies of all agreements reference in the project applicant's submittal documents.	The County is coordinating with the City and has provided the requested information to the City.
Pleasant Valley Recreation & Park District (PVRPD)	The EIR should include a more detailed analysis of impacts to parks and recreation spaces and programming, as the project would disproportionately impact PVRPD resources due to proximity and expected population.	See Section 4.11, *Less Than Significant Environmental Effects*, of the EIR.
Somis Municipal Advisory Council (MAC)	Patrick Richards comments that a number of his questions raised at the Scoping Meeting were not addressed.	Table 1-1 and Table 1-2 include the comments received during the NOP scoping period, including the Scoping Meeting, as well as the locations in this EIR where the comments are addressed.
	Patrick Richards comments that the project appears to be subject to popular vote under the County's Save Open space and Agricultural Resources (SOAR) Ordinance.	The project is not subject to the County's SOAR Ordinance. See Section 4.2, *Agricultural Resources – Soils*, and Section 4.10, *Land Use and Planning,* of the EIR.
	Patrick Richards comments that the noticing for the Scoping Meeting did not meet the state minimum requirement.	The County followed the requirements included in Section 15082(a) and (c) of the *CEQA Guidelines* for sending a Notice of Preparation (NOP) of an EIR and related Scoping Meeting(s). See Section 1.1, *Environmental Impact Report Background*.

Commenter	Comment/Request	Response/Where Comments are Addressed in the EIR
Ventura County Air Pollution Control District (VCAPCD)	The air quality assessment should consider consistency with the 2016 Air Quality Management Plan (AQMP). The Ventura County Air Quality Assessment Guidelines should also be used to evaluate all potential air quality impacts. The proposed CWWTF may need to obtain an APCD Permit to Operate for any odor control equipment and/or if the site is proposing to install an emergency diesel generator over 50 brake horsepower (BHP). The VCAPCD will review the EIR's air quality impact section, based on the CEQA Guideline's Appendix G significance thresholds for Air Quality.	See Section 4.1, *Air Quality*, of the EIR.
	Regarding the greenhouse gas (GHG) emissions analysis, the VCAPCD has concluded that using the neighboring South Coast Air Pollution Control District's recommended GHG emissions thresholds, as neither the County nor the VCAPCD have adopted GHG thresholds.	See Section 4.11, *Less Than Significant Environmental Effects*, of the EIR.

Table 1-2 Public Comments on the NOP and EIR Responses

Issue	Comment/Request	Where Comments are Addressed in the EIR
Support for Project	Several written and verbal comments were received in support of the proposed project because it would provide "essential" farmworkers with affordable housing.	Comments noted and will be presented to decisions makers.
CWWTF	The public agency that would operate the proposed CWWTF needs to be included in the EIR.	See Section 2, *Project Description*, of the EIR.
	Effluent from the proposed CWWTF must be in compliance with the Regional Water Quality Control Board (RWQCB) requirements and other applicable requirements.	See Section 4.9, *Water Resources – Surface Water Quality*, of the EIR.
Schools	The project would impact local school districts, including Somis Union School District and Oxnard Union High School District. The existing Somis School would not be able to support the proposed housing complex.	See Section 4.11, *Less Than Significant Environmental Effects*, of the EIR.
Transportation	The project would impact traffic. The project's location would cause a contribution to substantial impacts to vehicular traffic on SR 34 and SR 118. The potential project-related and cumulative traffic impacts to Somis Road and the community of Somis should be analyzed. Concerns for the safety of pedestrians and bicyclists in the project's vicinity. Will the project require a new bus stop of facilities?	See Section 4.7, *Transportation*, of the EIR.
Public Services	The project would impact the police and fire departments and hospitals.	See Section 4.11, *Less Than Significant Environmental Effects*, of the EIR.

Issue	Comment/Request	Where Comments are Addressed in the EIR
Utilities	The project would impact water supply, specifically Water District No. 19.	See Section 4.11, *Less Than Significant Environmental Effects*, of the EIR.
Water Quality	The EIR should address project-related and cumulative impacts on the Pleasant Valley Groundwater Basin. The EIR should address how NPDES requirements would be met. The EIR should analyze possible drainage impacts from the project.	See Section 4.9, *Water Resources – Surface Water Quality*, of the EIR.
Community Character	The project and cumulative projects would impact the community character of Somis. The EIR should consider the Somis Road viewshed. No three-story buildings currently exist along SR 34 from U.S. Highway 101 to SR 118.	See Section 4.11, *Less Than Significant Environmental Effects*, of the EIR.
Glare	The EIR should include a discussion of potential glare impacts to surrounding residences, to Rancho Campana High School, and from Somis Road.	See Section 4.11, *Less Than Significant Environmental Effects*, of the EIR.
Geology/Soils	The EIR should address hazards such as liquefaction and subsidence because the project site is located near Calleguas Creek.	See Section 4.11, *Less Than Significant Environmental Effects*, of the EIR.
Growth Inducement	The EIR should include a discussion of growth inducement and related impacts.	See Section 5.1, *Growth Inducement*, of the EIR.
Agricultural Land	The project would result in the loss of productive agricultural land. The EIR should address the loss of Prime, Statewide, Unique, and Local Farmlands.	See Section 4.2, *Agricultural Resources – Soils*, of the EIR.
SOAR Ordinance	The project appears to be subject to popular vote under the County's SOAR Ordinance.	See Section 4.2, *Agricultural Resources – Soils*, and Section 4.10, *Land Use and Planning*, of the EIR.
General Plan Consistency	The project needs to be analyzed for consistency with the County General Plan.	The project's consistency with the County General Plan is discussed throughout this EIR and specifically in Section 4.10, *Land Use and Planning*.
Alternatives	Alternative should include alternative sites, including within other cities in Ventura County.	See Section 6, *Alternatives*, of the EIR.
Inadequate Scoping	The format of the Scoping Meeting (i.e., a virtual meeting) did not provide for adequate public input. The County is taking advantage of the COVID-19 pandemic to move the project forward without adequate public input. Public noticing for the EIR and the Scoping Meeting was inadequate (i.e., not enough nearby property owners/tenants were noticed). Why was no Initial Study included with the NOP?	CEQA §21092(b)(3)(C) requires, as one of three options, "direct mailing to the owners and occupants of contiguous property shown on the latest equalized assessment roll" regarding distributing the NOP for an EIR. The County followed these requirements. See Section 1.1, *Environmental Impact Report Background*.

Issue	Comment/Request	Where Comments are Addressed in the EIR
Non-CEQA-Related Issues	The qualifying income for farmworkers seems high.	See Section 2.5.1.1, *Residential Buildings and Dwelling Units*, of the EIR.
	Concerns that the project applicant would sell the project in a few years as high-priced condominiums. Concerns that the owner of the property would be the same as the employer of workers residing at the proposed housing complex. Will there be controls on the number of people that can live in a rental unit?	Not CEQA-related. Concern to be addressed in Conditions of Approval for the project.
	How long will the large number of farm workers be viable, given the constant advances in technology? Is the project then housing for the homeless?	Not a CEQA-related issue. Concerns are speculative.
	Will the City of Camarillo be indirectly subsidizing the project?	Not a CEQA-related issue. The project would be not subsidized by the County or the City of Camarillo.

1.3 Scope and Content

This EIR addresses impacts identified as potentially significant. The following issues were found to include potentially significant impacts and have been studied in the EIR:

- Air Quality
- Agricultural Resources – Soils
- Biological Resources
- Cultural Resources – Historic
- Noise and Vibration
- Public Health
- Transportation
- Waste Treatment and Disposal Facilities – Solid Waste
- Water Resources – Surface Water Quality
- Land Use and Planning

In preparing the EIR, use was made of pertinent County policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Section 7, *References and Preparers*.

The alternatives section of the EIR (Section 6) was prepared in accordance with Section 15126.6 of the CEQA Guidelines and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the project while feasibly attaining most of the basic project objectives. In addition, the alternatives section identifies the “environmentally superior” alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required “No Project” alternative and one alternative development scenario for the project area.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the CEQA Guidelines provides the standard of adequacy on which this document is based. The CEQA Guidelines state:

> An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

1.4 Lead, Responsible, and Trustee Agencies

The CEQA Guidelines define lead, responsible, and trustee agencies. The County of Ventura is the lead agency for the project because it holds principal responsibility for approving the project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. Responsible agencies include the United States Army Corps of Engineers (USACE), which regulates waters of the U.S.; the California Department of Fish and Wildlife (CDFW), which regulates waters of the state; the Los Angeles Regional Water Quality Control Board (RWQCB), which regulates water quality in the region; and the Ventura County Air Pollution Control District (VCAPCD), which regulates air quality in the region. The VCAPCD submitted responses to the NOP that are included in Appendix A. The EIR will be submitted to the Los Angeles RWQCB and the VCAPCD for review and comment.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. There are no trustee agencies for the proposed project.

1.5 Environmental Review Process

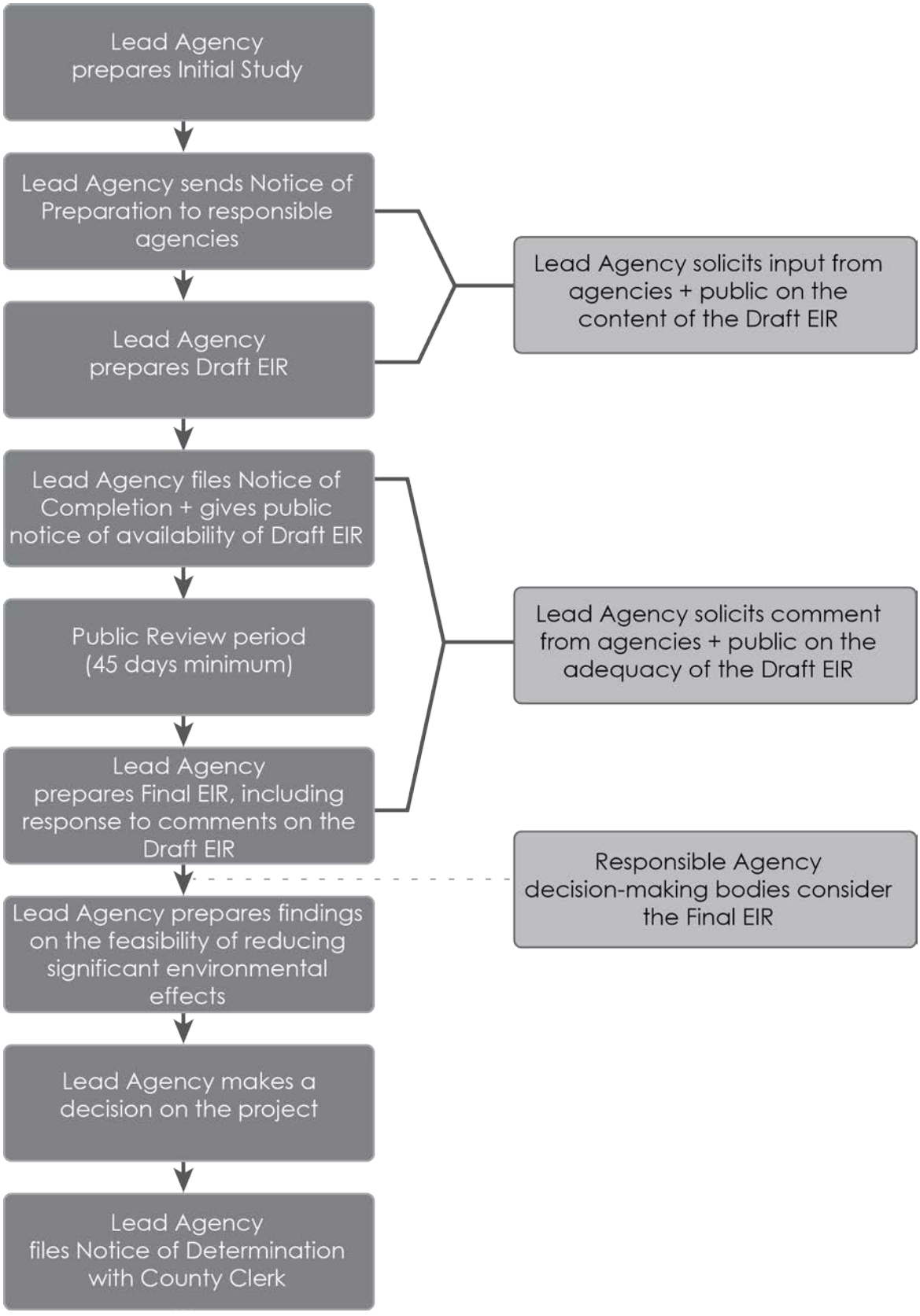
The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

1. **Notice of Preparation (NOP)**. After deciding that an EIR is required, the lead agency (County of Ventura) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (CEQA Guidelines Section 15082; Public Resources Code Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days.
2. **Draft EIR Prepared.** The Draft EIR must contain: (1) table of contents or index; (2) summary; (3) project description; (4) environmental setting; (5) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); (6) a discussion of alternatives; (7) mitigation measures; and (8) discussion of irreversible changes.
3. **Notice of Completion (NOC).** The lead agency must file an NOC with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the NOC to anyone requesting it (CEQA Guidelines Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: (1) publication in a newspaper of general circulation; (2) posting on

and off the project site; and (3) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (Public Resources Code Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (Public Resources Code 21091).

4. **Final EIR.** A Final EIR must include: (1) the Draft EIR; (2) copies of comments received during public review; (3) list of persons and entities commenting; and (4) responses to comments.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: (1) the Final EIR has been completed in compliance with CEQA; (2) the Final EIR was presented to the decision-making body of the lead agency; and (3) the decision making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may: (1) disapprove the project because of its significant environmental effects; (2) require changes to the project to reduce or avoid significant environmental effects; or (3) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations**. For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: (1) the project has been changed to avoid or substantially reduce the magnitude of the impact; (2) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or (3) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination (NOD).** The lead agency must file a NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167[c]).

Figure 1-1 Environmental Review Process



2 Project Description

This section describes the proposed project, including the project applicant, the project site and surrounding land uses, major project characteristics, project objectives, and discretionary actions needed for approval.

2.1 Project Applicant

Somis Ranch Partners, LLC
P.O. Box 6045
Oxnard, California 93030
(805) 310-5070

2.2 Lead Agency Contact Person

Justin Bertoline, Senior Planner
Ventura County Resource Management Agency, Planning Division
800 South Victoria Avenue, L# 1740
Ventura, California 93009-1740
(805) 654-2466

2.3 Project Location

The approximately 36.4-acre project site is located 2789 Somis Road on Assessor Parcel Number (APN) 156-0-180-48. The project site is situated just north of the intersection of Somis Road/Las Posas Road, immediately north of and adjacent to the City of Camarillo (City), and outside the City's sphere of influence and the Camarillo Urban Restriction Boundary (CURB). Figure 2-1 shows the regional location of the project site.

The project site is currently predominantly used for agricultural production. The project site also currently contains two residences and ancillary agricultural buildings located immediately south of Bell Ranch Road. An unpaved road provides access to the project site from Somis Road. The existing residential area covers approximately 2.7 acres (seven percent) of the project site. Figure 2-2 shows the location of the project site within the surrounding neighborhood.

The project site is regionally accessible from U.S. Highway 101 and locally accessible from the south via State Route (SR) 34 (i.e., North Lewis Road, which turns into Somis Road when traveling north from U.S. Highway 101) or from the north via SR 118 (i.e., East Los Angeles Avenue) to Somis Road.

2.4 Existing Site Characteristics

2.4.1 Existing Land Uses on the Project Site

The project site is currently predominantly used for agricultural production. The project site also currently contains two residences and ancillary agricultural buildings located immediately south of Bell Ranch Road. An unpaved road provides access to the project site from Somis Road (Figure 2-2).

Figure 2-1 Regional Location

Imagery provided by Esri and its licensors © 2020.

Project Location

N

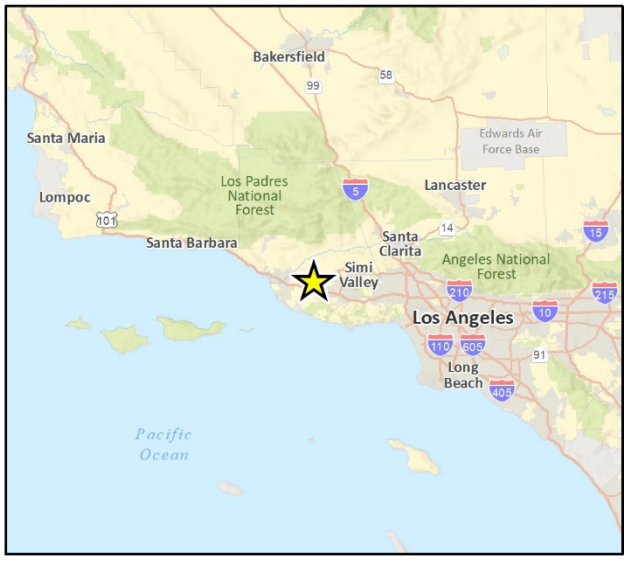


Figure 2-2 Project Site Location

Imagery provided by Microsoft Bing and its licensors © 2020.

Fig 2 Project Location

2.4.2 Surrounding Land Uses

The project site is bordered by agricultural lands to the northwest, north, and east. The southeastern edge of the project site abuts Somis Road, across which lies additional agricultural land.

Immediately southwest of the project site is the location of the City's planned North Pleasant Valley Groundwater Desalter Facility (Desalter Facility). It is estimated the construction of the Desalter Facility will continue through mid-2021. Operation of the Desalter Facility is expected to begin in late 2021 (City of Camarillo 2019, 2020). The 4.6-acre Desalter Facility site was annexed from the proposed project parcel (under the County's jurisdiction) into the City of Camarillo in December 2017, with subsequent approval of the Ventura Local Agency Formation Commission in April 2018.

The Oxnard Union High School District's Rancho Campana High School, for grades 9 through 12, is located approximately 300 feet west of the project site at 4235 Mar Vista Drive. A religious institution is located at 4345 Las Posas Road, approximately 450 feet southwest of the project site. The City of Camarillo Public Library is located at 4101 Las Posas Road, just west of the adjacent religious institution and approximately 850 feet southwest of the project site. Figure 2-2 shows the locations of surrounding land uses.

2.4.3 Land Use and Zoning Designations on the Project Site

The General Plan land use designation of the project site is Agricultural (County of Ventura 2019) and the zoning designation of the site is AE (Agricultural Exclusive), which has a 40-acre minimum lot size (County of Ventura 2020). However, Section 8103-2.7 of the Ventura County Ordinance Code states, "Parcels of less than the prescribed minimum lot area may be allowed for Farmworker Housing Complexes on land zoned AE within or adjacent to a city Sphere of Influence, provided the remaining non-farmworker housing complex parcel is a minimum of 10 acres" (County of Ventura 2020).

The proposed project is an allowed use under the Ventura County Non-Coastal Zoning Ordinance, as the project would involve the construction and occupation of a farmworker housing complex on approximately 18.43 acres of the project site and continuation of agricultural use on a 17.93-acre continued agricultural use parcel.

2.5 Project Characteristics

The proposed project would involve the construction and operation of an affordable multi-family housing complex for farmworkers (housing complex) on three proposed parcels totaling 18.43 acres and the continuation of agricultural use on a 17.93-acre continued agricultural use parcel. The proposed housing complex would include 360 dwelling units (apartments) and associated amenities. The project also would include the construction of a community wastewater treatment facility (CWWTF), which would serve the proposed housing complex and produce recycled water for irrigation of adjacent agricultural fields. The proposed project would not involve demolition or alteration of the existing on-site residences and agricultural buildings. Discussion of the details of the proposed project follows.

2.5.1 Housing Complex

The proposed 360-unit housing complex would include a variety of one-, two-, and three-bedroom apartments, as well as associated amenities such as community centers, play fields, tot

lots/playgrounds, a basketball court, a community garden area, and a network of meandering pedestrian walkways (RRM Design Group 2019). The majority of the apartment buildings would be three stories in height, with a maximum building height of 35.0 feet from ground level. The housing complex would provide the required number of off-street parking spaces, as required by Article 8 of the Ventura County Non-Coastal Zoning Ordinance (NCZO). In addition, 379 bicycle parking spaces would be available throughout the complex. Internal pathways would provide pedestrian circulation throughout the housing complex. The housing complex would also include a landscape agricultural buffer around the perimeter of the development site to minimize potential effects between the proposed housing complex and adjacent land uses. Table 2-1 summarizes the general characteristics of the housing complex.

Table 2-1 General Characteristics of Proposed Housing Complex

General Information	
Address	2789 Somis Road, Somis, Ventura County, California 93066
APN	156-0-180-48
Lot Area	802,810 sf (18.43 acres)
Proposed Site Coverage	**Square Footage**
Buildings	153,974 sf (19%)
Parking	229,012 sf (29%)
Hardscaping	24,364 sf (3%)
Landscaping	395,460 sf (49%)
Total	**802,810 sf (100%)**

sf = square feet

2.5.1.1 Residential Buildings and Dwelling Units

The housing complex would include a total of 30 apartment buildings with six building types. In addition to the six residential building types, an additional four residential units would be included in each of the proposed community center buildings. The architectural style of the residential buildings would be “Spanish Colonial.” Dwelling units would range in size from 576 to 1,104 gross square feet. Table 2-2 includes a summary of the different types of residential buildings and dwelling units within the housing complex. Figure 2-3a and Figure 2-3b show the site plan of the proposed housing complex. Figure 2-4 shows the typical elevations of three-story residential buildings and Figure 2-5 shows the typical elevations of the two-story community centers.

Table 2-2 Summary of Types of Residential Buildings and Dwelling Units in Proposed Housing Complex

Proposed Residential Building Types	No. of Buildings per Type in Complex	No. of Dwelling Units per Building Type in Complex				No. of Stories (Max. Building Height)
		1-BR/1-BA (576 gross sf)	2-BR/1-BA (816 gross sf)	3-BR/2-BA (1,104 gross sf)	Total DUs per Building Type	
Building Type A	7			12	12	3 (35.0 ft)
Building Type B	14		12		12	3 (35.0 ft)
Building Type C	3	12			12	3 (35.0 ft)
Building Type D	1	1	2	1	4	2 (27.0 ft)
Building Type E	2	24			48	3 (35.0 ft)
Building Type F	1	3	6	3	12	3 (35.0 ft)
Community Center Buildings with DUs	2	1	2	1	4	2 (28.4 ft)
Summary of Buildings/Dwelling Units						
Total Residential Buildings				30		
No. of DUs in Complex						
Total 1-BR DUs				90		
Total 2-BR DUs				180		
Total 3-BR DUs				90		
Grand Total DUs				**360**		

BA = bathroom(s); BR = bedroom(s); DU = dwelling unit(s); ft = feet; sf = square feet

Figure 2-3a Project Site Plan

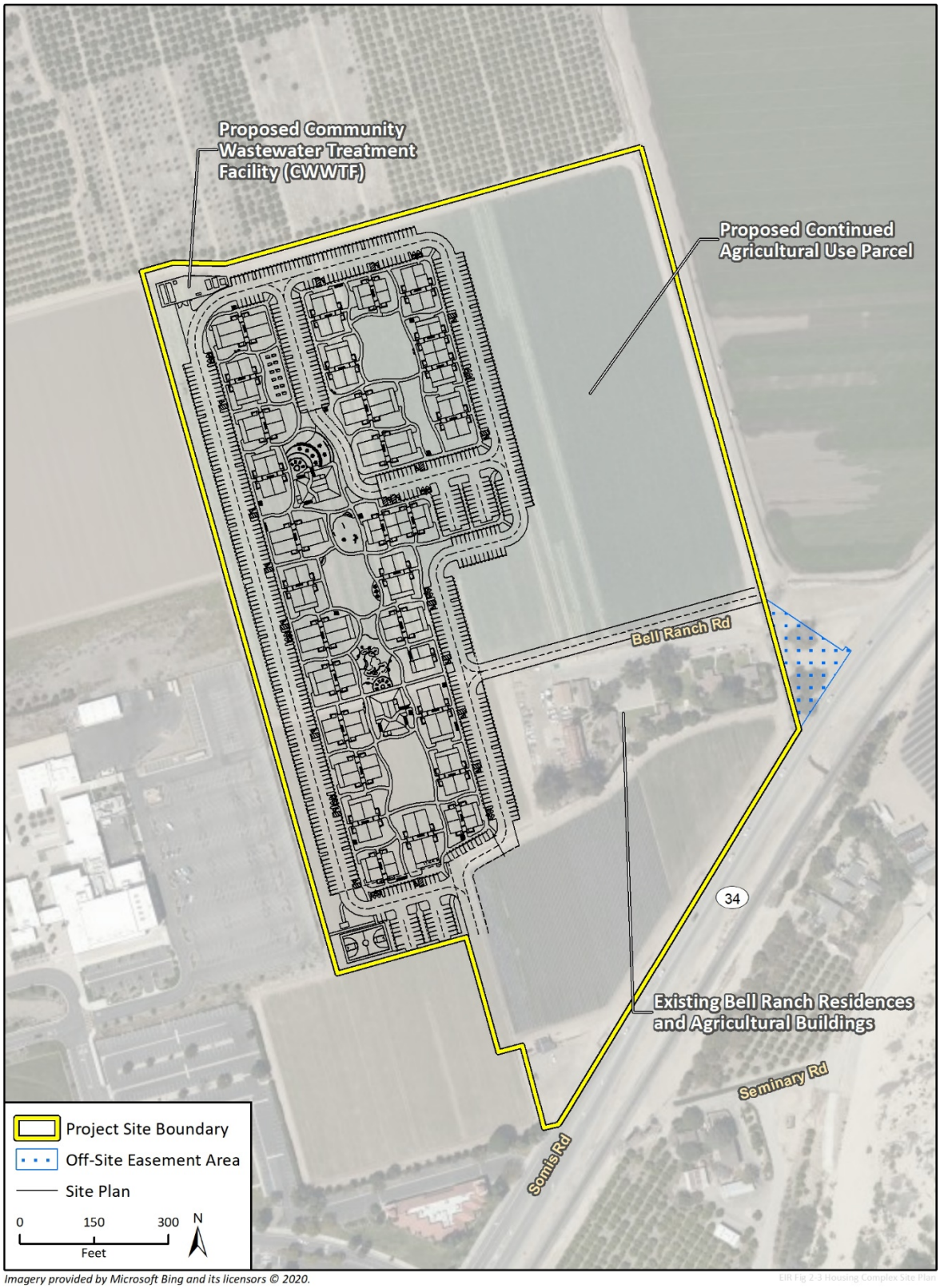
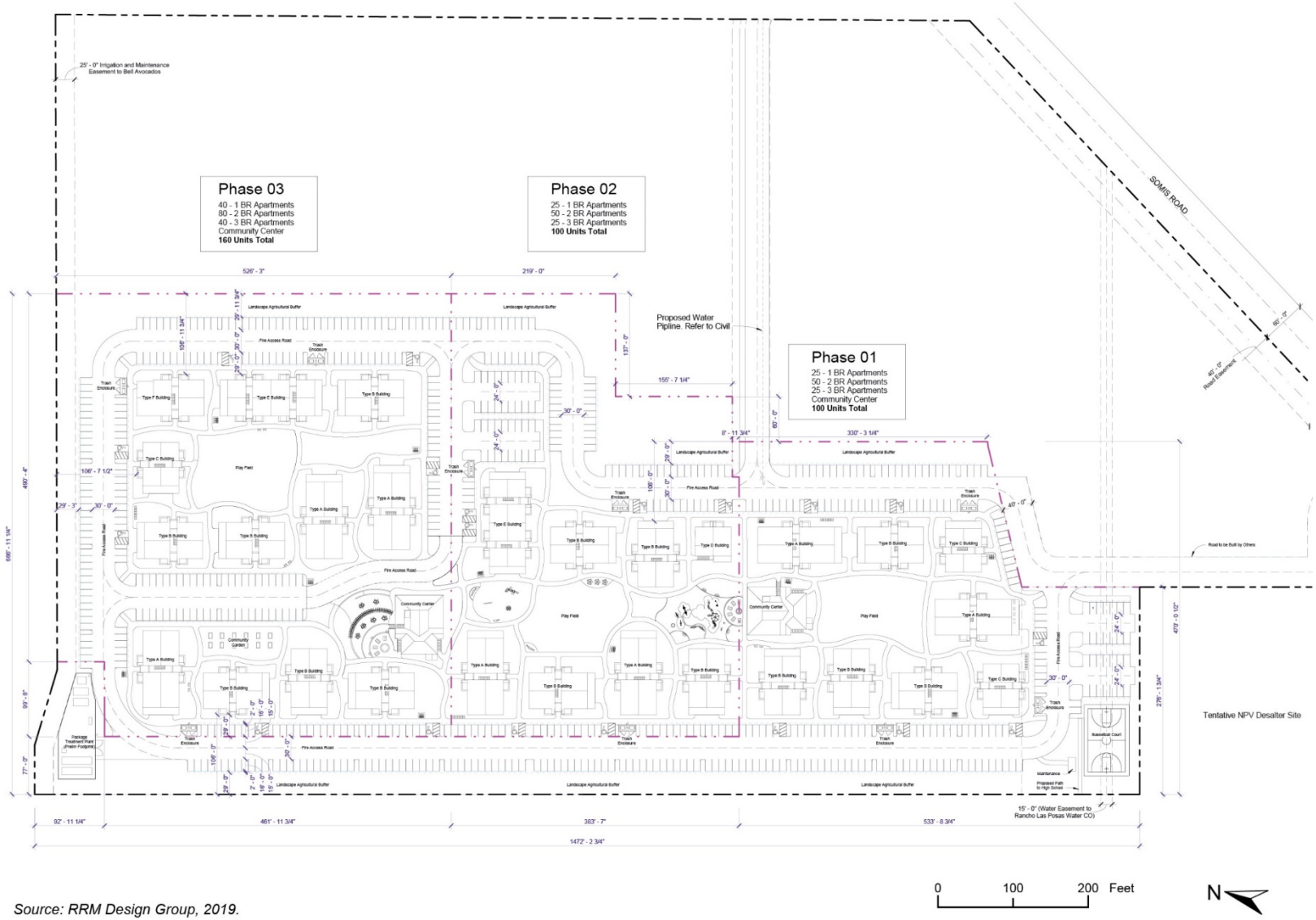


Figure 2-3b Housing Complex Site Plan



Source: RRM Design Group, 2019.

Figure 2-4 Typical Three-Story Residential Building Elevations

1 Building A Front

2 Building A Side

0 10 20 Feet

Source: RRM Design Group, 2019.

Figure 2-5 Typical Community Center Building Elevations

1 Community Center Front

2 Community Center Back

4 Community Center Side2

3 Community Center Side1

0 15 30 Feet

Source: RRM Design Group, 2019.

2.5.1.2 Vehicular Access and Parking

The housing complex would be accessible from two driveways from Somis Road. The southern driveway would be located within an existing 40-foot-wide easement over a road built by others that provides access to the City's Desalter Facility site. The southern driveway would include a bicycle/pedestrian pathway. The eastern driveway would follow a proposed 50-foot-wide easement north of the existing Bell Ranch residences and agricultural buildings and would provide access to the housing complex from the east. The eastern driveway would be constructed as part of the proposed project and would include an off-site portion of the driveway to connect the housing complex to Somis Road. The off-site portion of the driveway would occur on a 0.42-acre area east of the project site. The driveways have been designed to meet the Ventura County Fire Department's minimum design standards and requirements. The housing complex would also include an internal, looping access road that has been designed to meet Ventura County Fire Department's fire aerial apparatus standards. Fire access roads would be modified for each construction phase of the project. Each implementation phase would meet Ventura County Fire Department's fire aerial apparatus standards.

Under Article 8 of the Ventura County NCZO, the housing complex would be required to provide 654 parking spaces, including 19 accessible spaces for persons with disabilities. The proposed housing complex would include 655 parking spaces, 19 of which would be designated as accessible spaces. In addition, 379 bicycle parking spaces would be available throughout the complex.

2.5.1.3 Utilities

The housing complex would be served potable water by Ventura County Water Works District No. 19 (Water District). The project site is currently located in the Water District's service area. On May 8, 2019, the County of Ventura issued a Water Availability Letter for the proposed project, confirming the availability of water supplies from the Water District.

Wastewater (sewage) generated by the housing complex would be treated by the proposed CWWTF (see Section 2.5.2, Community Wastewater Treatment Facility, for details regarding the CWWTF).

The housing complex, including the CWWTF, would require electrical service, which would be provided by Southern California Edison. Cable and telephone service would be provided to the housing complex by Spectrum. No natural gas service would be provided to or required by the housing complex.

2.5.1.4 Landscaping, Stormwater Detention, and Hardscaping

The residential buildings would overlook core community spaces such as play fields, a community garden, playgrounds, and community centers. Internal meandering pathways would provide pedestrian circulation throughout the housing complex.

Figure 2-6 shows the landscape plan for the housing complex. The housing complex would be surrounded by a 29-foot-wide landscaped area along the western and eastern perimeters, which would serve as a buffer between the proposed housing complex and existing surrounding agricultural operations. Additionally, the housing complex would involve landscaped areas throughout the complex, totaling approximately 281,000 square feet. The landscaping plant palette would be comprised of drought-tolerant tree and shrub species. A weather-sensing "smart controller" would be used to monitor irrigation water and manage daily water consumption.

Landscaping would be irrigated using bubblers, drip irrigation, or other water-efficient irrigation systems.

Figure 2-6 Landscape Plan

Source: RRM Design Group, 2019.

As discussed in the Preliminary Hydrology Memo (Appendix I), the housing complex would include two stormwater detention basins on the east side of the project site. Runoff from impervious surfaces within the housing complex would be directed toward one of the stormwater detention basins. Outflow from the basins would be released into an existing drainage channel along the western side of the project site.

2.5.1.5 Requirements and Verification Process for Residences

Affordable Housing Income Levels and Farmworker Housing Verification Process

The proposed project would consist of 100 percent affordable housing units. The project applicant intends for the proposed housing complex to serve individuals and families with lower incomes, including the subcategories of very low and extremely low incomes. Per the California Department of Housing and Community Development, "lower income" is defined as those who earn less than 80 percent of the local area median income (AMI). At the time of publication of this Draft EIR, the final affordability breakdown had not been determined. However, the project applicant tentatively estimates that the majority of apartments would be available to those earning 60 percent of the AMI or below. It is also anticipated that some apartments would be available to very low (30 to 50 percent of the AMI) and extremely low (0 to 30 percent of the AMI) income individuals/families.

Section 8107-41.1 of the Ventura County NCZO provides the farmworker employment criteria and states:

> In a Farmworker Housing Complex, dwelling units shall only be rented to… persons who are principally employed within the County of Ventura for activities associated with Crop and Orchard production (Sec. 8105-4) and all uses listed there under. 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.

Accordingly, to qualify for an apartment in the proposed housing complex, potential residents would be required to demonstrate that they either: (1) earn at least 51 percent of their annual income from qualifying agriculture; and/or (2) are employed in agriculture for at least 51 percent of the total days employed on an annual basis.

The development would be managed by a qualified affordable housing provider that would be responsible for verifying resident incomes initially and annually. The housing complex would not be owned or controlled by any agricultural employers.

Density Bonus and Affordable Housing Incentive

Article 16 of the Ventura County NCZO and Government Code Section 65915 requires the County to provide incentives for affordable housing projects. The number of incentives is based on the affordability of the project, in addition to any waivers that may be necessary, consistent with Government Code Section 65915(e). Because the proposed housing complex would be 100 percent affordable, the project qualifies for three incentives, as well as a waiver of development standards that would physically preclude construction of the project at the permitted densities or with the incentives.

The types of incentives that can be granted for this project include:

A. A reduction in site development standards; and

B. Other regulatory incentives proposed by the Affordable Housing Developer or the County that result in identifiable, financially sufficient, and actual cost reductions.

In accordance with Sections 8116-3.1 and 8116-7 of the Ventura County NCZO, the proposed housing complex has requested the following Affordable Housing Incentives:

1. An increase in maximum building lot coverage from 5 percent, as established in Figure 3.4 of the General Plan Goals, Policies, and Programs, to 25 percent.

   Justification: By increasing maximum building lot coverage to 25 percent, the density of the proposed housing complex would be financially feasible.

2. A reduction in the side yard setbacks for structures 25 to 35 feet in height from 15 feet, as established in Section 8106-1.1 of the Ventura County NCZO, to 10 feet.

   Justification: By reducing side yard setback requirements for two- and three-story structures from 15 feet to 10 feet, the project applicant would avoid potentially costly revisions or modifications to the standard building types proposed within the housing complex, resulting in a substantial cost savings, as several proposed three-story buildings (35 feet in height) would be located within 10 to 15 feet of side yard property lines.

3. A reduction and or waiver of Quimby Fees, as required by Section 8209-6 of the Ventura County Subdivision Ordinance.

   Justification: A reduction or waiver of Quimby Fees would substantially reduce the financial burden on the project applicant, thus resulting in a housing complex that would be fiscally feasible. Additionally, the project may be entitled to an offset to the Quimby Fees, based on the amount of proposed open space areas (i.e., play fields), playgrounds, and other recreational areas/facilities within the housing complex, thus reducing the need for off-site park/recreational areas.

Proposed Development Funding

Funding for the proposed affordable housing complex is anticipated through a variety of potential sources. Such sources may due to availability and anticipated timing of construction for each of the three proposed phases (see "Construction" below regarding the construction phases). Anticipated funding sources may include the California Tax Credit Allocation Committee, Tax Exempt Bonds and Four Percent Low-Income Housing Tax Credits, the Federal Home Loan Bank Affordable Housing Program, the California Department of Housing and Community Development's Multi-Family Housing Program, the Joe Serna Jr. Farmworker Housing Grant Program, Ventura County's Community Development Block Grant and Home Investment Partnerships Program funds, and/or other sources.

2.5.2 Community Wastewater Treatment Facility

Because the project site is outside the Camarillo Sanitary District service area, the project includes on-site wastewater treatment. The housing complex would include the construction and operation of a CWWTF on an approximately 5,000- to 7,000-square-foot area in the northwest corner of the project site. The proposed CWWTF would include a conventional membrane bioreactor package with a footprint of approximately 1,488 square feet.[2] The CWWTF would be designed to treat

[2] The proposed CWWTF is an MEMPAC-M model, such as those manufactured by Cloacina in Arroyo Grande, California.

wastewater (sewage) generated by the housing complex to tertiary treatment standards. The on-site CWWTF would treat all wastewater generated by the housing complex. At full occupancy of the housing complex, the CWWTF would treat an estimated average daily flow of 99,000 gallons of wastewater per day (Water Resource Engineering Associates [WREA] 2019).

Collection of on-site wastewater (influent) would occur through gravity system sewer drainage pipelines. The gravity collector would terminate at a concrete shaft wet-well in a lift station. From the lift station, an influent force main would discharge to a 2-millimeter influent screen. Screened influent would discharge to the transfer chamber, where influent would be pumped to two 25,000-gallon equalization storage basins. Screened influent would be returned to the anoxic chamber (denitrification) and mixed with return activated sludge to the anoxic chamber, which includes monitoring equipment such as a dissolved oxygen sensor. From the anoxic chamber, effluent would enter the aeration chamber by gravity, where effluent would be monitored by dissolved oxygen and suspended solids sensors (WREA 2019).

Activated sludge from the aeration chamber would be transferred to the membrane chambers at four times the average daily flow rate, or approximately 275 gallons per minute. The CWWTF would utilize Fibracast, FibrePlate TM FPC500 membrane cassettes. Activated sludge would be returned via gravity to the anoxic chamber, where activated sludge would be mixed with raw influent. Membrane permeate would discharge through in-line ultraviolet (UV) disinfection units prior to entering the clear well chamber (WREA 2019).

Effluent stored in the clear well chamber would be pumped through each membrane cassette to perform a Backflash or Clean in Place, which would be conducted at routine intervals, according to the manufacturer's requirements. Biosolid concentration would be monitored by a suspended solids meter located in the aeration chamber. Sludge wasting pumps would remove a portion of the activated sludge to two 12,000-gallon sludge storage tanks for appropriate removal and off-site disposal at a facility licensed to accept such waste (WREA 2019).

The CWWTF site would be enclosed by a masonry block wall, which would reduce noise generated by the CWWTF (WREA 2019).

The proposed CWWTF would be active (i.e., via aeration treatment method); therefore, the only potential source of undesirable odors would be at the inlet to the facility. Air scrubbers attached to the anoxic chamber would incorporate advanced odor control technology. Specifically, the air scrubbers would minimize odors from hydrogen sulfide, mercaptans, ammonia, amines, and other odors generated in wastewater collection and treatment systems (WREA 2019).

The CWWTF would be designed to treat wastewater generated on-site to meet Disinfected Tertiary Recycled Water requirements in accordance with California Code of Regulations (CCR) Title 22. Treated wastewater effluent, referred to as "recycled water," would be beneficially reused for off-site agricultural irrigation. The project site is situated adjacent to approximately 70 acres of orchards. Currently, the adjacent orchards are irrigated with relatively low-quality groundwater pumped from a private well. If the proposed project is approved and built, higher-quality recycled water generated by the CWWTF would be blended with pumped groundwater to improve the quality of agricultural irrigation water (WREA 2019).

Recycled water generated by the CWWTF would be temporarily stored in an approximately 25,000-gallon recycled water/irrigation water storage tank. The CWWTF would also include pump stations and recycled water pipelines that would deliver recycled water to off-site irrigation systems. Excess recycled water and treated wastewater effluent not meeting recycled water quality standards would be dispersed through a series of underground seepage pits along the western boundary of

the housing complex. Biosolids generated by the CWWTF would be stored on-site in two approximately 12,000-gallon sludge storage tanks until the biosolids are transported for disposal at a facility licensed to accept this type of waste (WREA 2019).

Per Section 8204-8 of the County of Ventura Subdivision Ordinance, a public sewer agency is required to operate the CWWTF. The Ventura Regional Sanitation District (VRSD) would be responsible for operation of the CWWTF.

2.5.3 Continued Agricultural Use Parcel

Under the proposed project, the eastern portion of the project site would continue to operate as an agricultural field for crops on a 17.93-acre continued agricultural use parcel. The proposed project would not result in any physical changes to the continued agricultural use parcel.

2.5.4 Construction

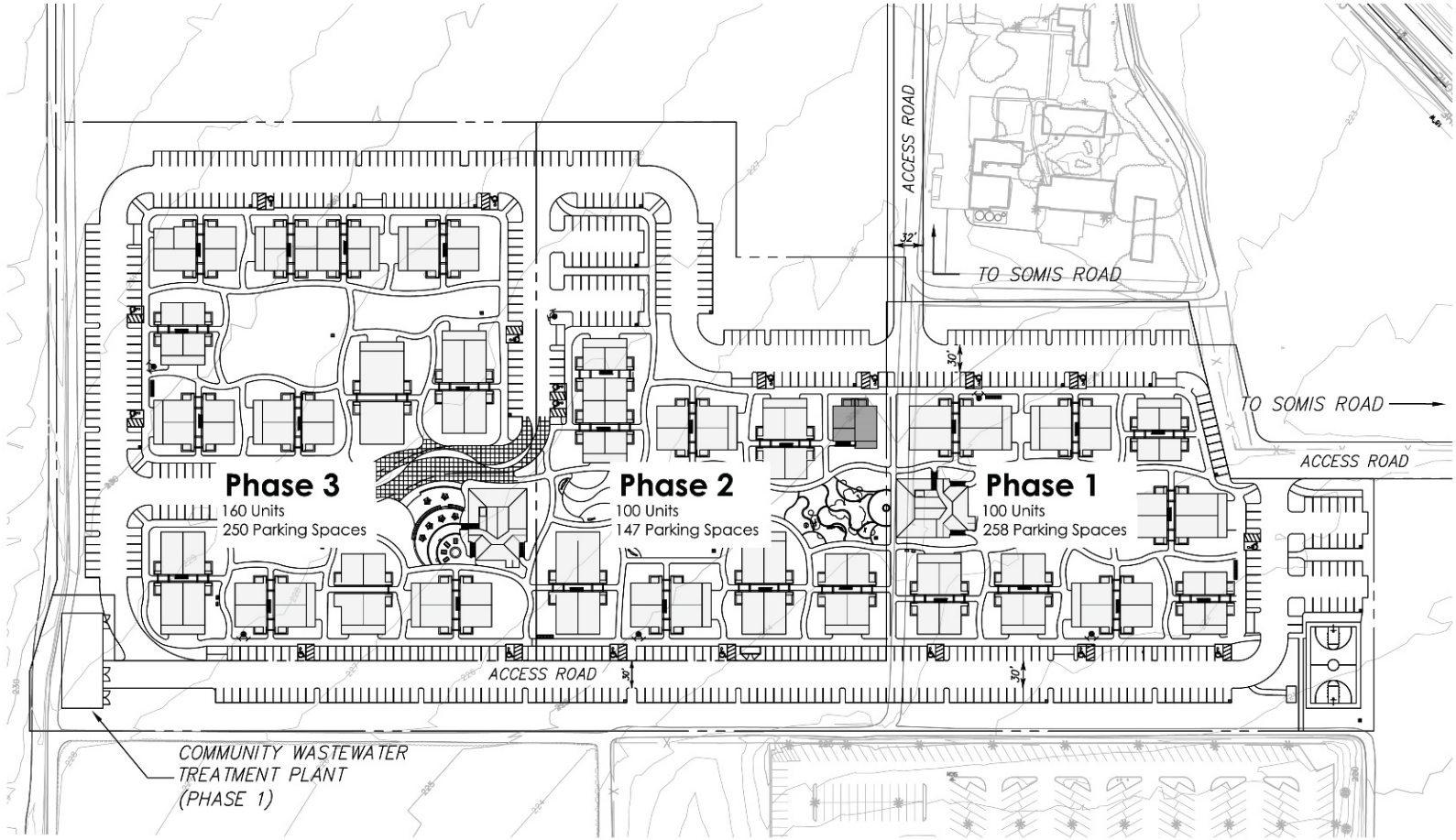
The housing complex would be constructed in three phases. The CWWTF would be constructed as part of Phase 1 and would be expanded to accommodate the needs of the housing complex as additional apartments are constructed during Phases 2 and 3. Figure 2-7 illustrates the proposed phasing plan. The phases of the housing complex would include the following features:

- **Phase 1:** Phase 1 would include 100 dwelling units, comprised of 25 one-bedroom apartments, 50 two-bedroom apartments, and 25 three-bedroom apartments. Proposed amenities associated with Phase 1 would include a community center building, a play field, a basketball court, landscaping, pedestrian walkways, trash enclosures, and 182 parking spaces (including 6 accessible spaces).
- **Phase 2:** Phase 2 would also include 100 dwelling units, comprised of 25 one-bedroom apartments, 50 two-bedroom apartments, and 25 three-bedroom apartments. Proposed amenities associated with Phase 2 would include a play field, tot lots/playgrounds, landscaping, pedestrian walkways, trash enclosures, and 182 parking spaces (including 6 accessible spaces).
- **Phase 3:** Phase 3 would include 160 dwelling units, comprised of 40 one-bedroom apartments, 80 two-bedroom apartments, and 40 three-bedroom apartments. Proposed amenities associated with Phase 3 would include a community center building, a play field, a community garden area, landscaping, pedestrian walkways, trash enclosures, and 290 parking spaces (7 accessible spaces).

Construction of Phase 1 is anticipated to begin in August 2021. Phases 2 and 3 would be constructed as needed, once the previous phase of the housing complex is occupied. Construction of Phases 1, 2, and 3 of the housing complex is expected to take approximately eight, six, and eight months, respectively.

Construction activities for Phases 1, 2, and 3 would require a total of approximately 1,500 cubic yards (cy) of cut soil and 35,100 cy of fill soil, resulting in the import of approximately 33,600 cy of soil to the project site. No soil export would be necessary. Construction staging and construction work parking would occur on the project site.

Figure 2-7 Housing Complex Phasing Plan



Source: Jensen Design & Survey Inc., 2019.

2.6 Project Objectives

The objectives of the proposed project are as follows:

1. Develop a financially viable affordable residential community for lower-income farmworkers and their families in Ventura County to accommodate broad market needs.
2. Provide affordable housing units for farmworkers that will help meet the identified need assigned to Ventura County pursuant to California State Law and adopted in the County's Housing Element.
3. Support the local agricultural industry by providing local farmworker housing proximate to agricultural operations in Ventura County.
4. Provide a variety of apartment sizes to meet various family sizes.
5. Arrange the proposed apartment buildings and on-site amenities in a manner that is logical and promotes efficient use of the housing complex property.
6. Provide recreational opportunities for future project residents with on-site play fields, tot lots/playgrounds, active recreation opportunities, a community garden area, meeting rooms, and a network of meandering pedestrian walkways.
7. Minimize proposed building footprints and other impervious surfaces to accommodate on-site landscaped common space for future project residents.
8. Design an efficient internal circulation system that is safe for pedestrians and bicyclists.
9. Locate affordable housing in a location that provides convenient access to nearby services such as library, schools, commercial centers, and religious institutions.
10. Develop the project site in a manner that would not adversely affect neighboring land uses or infrastructure, including with regard to:
    - Water and sanitation services;
    - Land use compatibility; and
    - The scale of the project.
11. Develop the project site in a manner that would minimize affects from neighboring land uses to the proposed housing complex and future project residents.
12. Avoid modification to the existing Bell Ranch residences and agricultural buildings.

2.7 Required Approvals

The proposed project would require the discretionary approval of the County of Ventura. Pursuant to NCZO (§§8105-4 and 8111-1.2 et seq.), the Planning Commission is the decision-maker for the requested Tentative Parcel Map (TPM) and Planned Development Permit (PD Permit) and the Board of Supervisors are the decision-maker for the requested Conditional Use Permit (CUP) for the CWWTF. However, these decisions can be consolidated to streamline the decision-making process. Pursuant to NCZO §8111-4.1.1, the Planning Director has the authority to defer the final decision-making authority to the Board of Supervisors if the cause is deemed justifiable by the Planning Director.

Table 2-3 includes the approvals/permits required for the proposed project.

Table 2-3 Required Approvals/Permits

Agency	Approval/Permit Type
County of Ventura	Tentative Parcel Map (TPM) to authorize the four-lot subdivision of an existing legal lot
	Conditional Use Permit (CUP) to authorize the construction of the CWWTF
	Planned Development (PD) Permit to authorize the construction of the 360-unit farmworker housing complex
	System Construction Permitting, Plumbing, Electrical, and Structural Permits and Approvals (for the CWWTF)
	Grading Permit(s)
	Various access and utilities easements to be recorded by others (including for the proposed southern and eastern access roads)
Los Angeles Regional Water Quality Control Board (RWQCB)	Water Reclamation Requirement (WRR)[1] and waste discharge requirements (WDR)[2,3] permits and approval to construct
California State Water Resources Control Board (SWRCB)	WRR[1]

1. The "beneficial reuse" of the recycled water for agricultural irrigation requires a WRR and an "approval to construct" from RWQCB.
2. The application for approval includes, but is not limited to, system plans and calculations, percolation test results showing soils suitability for subsurface dispersal, demonstration that dispersal field meets setback requirements, and information regarding the water supply system.
3. Ongoing operation and reporting: As a requirement of the WDR, a designated site supervisor would be responsible for the maintenance of the CWWTF and including sampling and analytical procedures for reporting for proper treatment system performance. The CWWTF owner is required to retain the services of a Certified Operator to perform the overall management of the CWWTF.

3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The project site is located in the County of Ventura, immediately north of and adjacent to the City of Camarillo, and outside the City's sphere of influence and CURB. The project site is approximately 11 miles east of the County of Ventura government center in the city of Ventura and 3 miles northeast of the civic center of the City of Camarillo. The site is just north of the intersection of Somis Road and Las Posas Road.

South of the project site, a system of roadways, including arterials, collectors, and local streets, provide vehicular access throughout the City of Camarillo. North of the project site is a system of two-lane and four-lane highways and County local roads. Nearby major roadways include Somis Road/SR 34, Las Posas Road, and East Los Angeles Avenue/SR 118. The closest freeway is U.S. Highway 101, which is located two miles south of the project site.

The project site is located approximately 11 miles inland from the Pacific Ocean. The climate and the coastal influence produce moderate temperatures year-round, with rainfall concentrated in the winter months. Although air quality in the area has steadily improved in recent years, the region is identified as being in nonattainment for ozone (smog) and particulate matter less than 10 microns in diameter (PM_{10}).

3.2 Project Site Setting

As shown in Figure 2-2 in Section 2, *Project Description,* the project site and surrounding properties are predominantly used for agricultural production. The project site is bordered by agricultural lands to the northwest, north, and east. The southeastern edge of the project site abuts Somis Road, across which lies additional agricultural land. The Oxnard Union High School District's Rancho Campana High School is located immediately west of the project site and a religious institution is located immediately southwest of the project site.

The project site is currently used for agricultural production, with ancillary residences and agricultural buildings located immediately south of Bell Ranch Road. The project site has a General Plan land use designation of Agricultural and a zoning designation of Agricultural Exclusive (AE). Uses permitted in the AE designation seek to preserve and protect agriculture and commercial agriculture uses. Farmworker housing is an allowed use in the AE zone pursuant to Section 8103-2.7 of the Ventura County Ordinance Code.

3.3 Cumulative Development

In addition to the specific impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts. CEQA defines "cumulative impacts" as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts.

Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, noise impacts of two nearby projects may be less than significant when analyzed separately, but could be significant when analyzed together. Cumulative impact analysis allows the EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

CEQA requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. Currently planned and pending projects in the County of Ventura and surrounding areas, including the City of Camarillo, are listed in Table 3-1. The locations of the cumulative projects are shown on Figure 3-1. These projects are considered in the cumulative analyses in Section 4, *Environmental Impact Analysis*.

Table 3-1 Cumulative Projects List

Project No.	Case No.[1]	Project Location[2]	Land Use
City of Camarillo			
1	CPD-77M(5)	4444 Central Ave	Hotel conversion, renovation, and minor addition
2	IPD-403	950 W. Verdulera St	New industrial building
3	IPD-385M(1)	South side of Verdulera St, 175' west of W. Ventura Blvd	Architectural modification and expansion
4	RPD-195, TT-5671M(3)	Northwest corner of U.S. Highway 101 and Springville Drive	Single-family residential
6	CUP-350	Southwest corner of Ponderosa Drive and Camino Tierra Santa	Mixed-use rental
6	CUP-350	Southwest corner of Ponderosa Dr and Camino Tierra Santa (Springville)	Mixed use
7	TT-5903, RPD-177	South side of Ponderosa Drive between Camino Tierra Santa and Earl Joseph Drive	Condominiums
8	CPD-226M(3)	Northeast corner of W. Ventura Blvd and Springville Dr	Commercial center
9	CUP-334	South of W. Ventura Blvd East of Springville Dr	Bowling alley and ice rink
10	CUP-403	Crestview Estates/Las Posas Hills on Crestview Ave	Well Pump and Pump House
11	IPD-404	375 Willis Ave	Energy storage facility
12	CUP-402	25 Las Posas Rd	New wireless facility in a tower
13	CPD-245	301 E. Daily Dr	Automated carwash
14	CUP-384/ CPD-246	Northeast corner of Las Posas Rd and Ventura Blvd	Hotel and conference center
15	IPD-398 T-5890	South side of Camarillo Center Dr, between Las Posas Rd and Factory Stores Dr	Multi-tenant industrial (four condo buildings)
16	CPD-5M(27)	323 Carmen Dr	New drive-thru building

Project No.	Case No.[1]	Project Location[2]	Land Use
17	LD-537, RPD-199	Southerly terminus of Barcelona Street	Four single-family residential lots
18	CPD-2M(3)	1641 Daily Dr	Façade remodel
19	CUP-330	2024 Ventura Boulevard	Mixed-use (one low and 22 moderate income units)
19	CUP-330	2024 Ventura Blvd between Cedar and Oak Streets (Old Town)	Mixed use
20	CUP-392	2275 Las Posas Rd	New roof-mounted wireless facility
21	CUP-391	99 South Glenn Drive	Mixed-use, 12 apartments
21	CUP-391	99 South Glenn Dr	Mixed use, 12 apartments, 2 retail spaces
22	RPD-202	Southeast corner of Glenn Drive and Chapel Drive	Rental townhomes (one low income)
23	CUP-397	2255 Pleasant Valley Rd, Unit K	Dog and cat rescue center
24	LD-544, RPD-203	2521 Barry Street	Residential (two low income)
25	IPD-5M(1)	575 Dawson Dr	Addition of new elevator
26	TT-5969, RPD-196	Northeast corner of Pleasant Valley Road and Lewis Road	285 for-sale townhomes (includes 29 moderate income units)
27	CUP-369	Northeast corner of Pleasant Valley Road and Lewis Road	24 mixed-use apartments (includes three low income units)
27	CUP-369	Northeast corner of Pleasant Valley and Lewis Roads	24 mixed-use apartments (including 3 low income)
28	RPD-188	350 Lewis Road	Townhomes (includes nine moderate income units)
29	RPD-189M(2)	Park Drive between Petit Street and Westpark Court	Rental unit apartments
30	CUP-307M(2)	Between Village at the Park Drive and Westpark Court	Mixed-use rental
30	CPD-232M(2)	Northwest corner of Santa Rosa Rd and Oak Canyon Rd	Two office/retail buildings
31	CPD-236	Between Village at the Park Dr and Westpark Ct (Village at the Park)	Commercial mixed-use center
32	CPD-236M(1)	Between Village at the Park Dr and Westpark Ct (Village at the Park)	Two commercial pads
33	CUP-404	3201 Corte Malpaso, Unit 310	Wine production facility
34	IPD-53M(11)	3233 E. Mission Oaks Blvd	Demolition of office building, construction of new multi-tenant industrial
35	IPD-53M(9)	3233 E. Mission Oaks Blvd	Industrial building modification
36	IPD-405	South side of Calle Tecate west of Flynn Rd	New industrial building
37	LD-545	201 Flynn Rd	Subdivision of parcel into two parcels
38	CUP-379	2411 Ponderosa Dr	Desalter
40	CUP-401	1330 Flynn Rd, Unit E	Winery

Project No.	Case No.[1]	Project Location[2]	Land Use
41	CUP-387	4053 Calle Tesoro	New wireless facility
42	CUP-394	Northwest of the intersection of Las Posas and Lewis Rd	North Pleasant Valley Groundwater Desalter Facility
43	IPD-23M(25) TT-6015	4530 Adohr Ln	Façade renovations and eight new condo units
44	TT-5976, RPD-198	Northeast corner of Somis Road and Upland Road	281 senior, single- and multi-family residential
45	CPD-99M(4)/ CUP-381	4676 Adolfo Rd	Conversion of auto repair facility to a convenience store
47	LD-539	5151, 5153, 5155 Camino Ruiz	Land division
48	RPD-201	Southeast corner of Camino Ruiz and Verdugo Way	Rental apartments, mix of studio, one-, and two-bedroom units
50	IPD-396	West side of Camino Carillo, approximately 230' south of Verdugo Way	Industrial (one-unit building)
51	TT-5979	Terminus of Camino Carillo, west of Conejo Creek	Tentative Tract Map for Lots 4-7
52	CUP-312	5575 Santa Rosa Rd	Church (total of 31,240 sf in three phases)
54	IPD-390	Northeast corner of Camino Carillo and Camino Ruiz	Multi-tenant industrial (two buildings)
54	IPD-391	Southeast corner of Camino Carillo and Camino Ruiz	Multi-tenant industrial (two buildings)
54	IPD-392	Southeasterly terminus of Camino Carillo west of Conejo Creek	Multi-tenant industrial (two-unit building)
54	IPD-393	Southerly terminus of Camino Carillo west of Conejo Creek	Multi-tenant industrial (two-unit building)
54	IPD-394	Southerly terminus of Balboa Circle, west of Conejo Creek	Industrial (one-unit building)
54	IPD-395	West side of Balboa Circle at the end of the cul-de-sac	Multi-tenant industrial
56	RPD-204, TT-601	791 Camarillo Spring Road	248 senior for-sale residential units
58	CUP-371M(1)	795 Camarillo Springs Rd, Ste F	Modification to conditions of approval
County of Ventura			
59	PL19-0039	Alviso Drive	Replacement of water well infrastructure
60	PL19-0016	131 San Miguel Drive	Subdivision of one discrete legal lot into two residential lots
61	PL20-0007	540 Marissa Lane	Lot line adjustment between two residential parcels
62	PL19-0026	APN 2300063375	Agricultural storage yard
63	PL15-0058	723 Alosta Drive	Lot line adjustment between three residential lots
64	PL19-0099	3450 Pleasant Valley Road	Wireless telecommunications facility
65	LU10-0003	APN 2340060220	Extended use of existing hard rock mining operation and processing facility

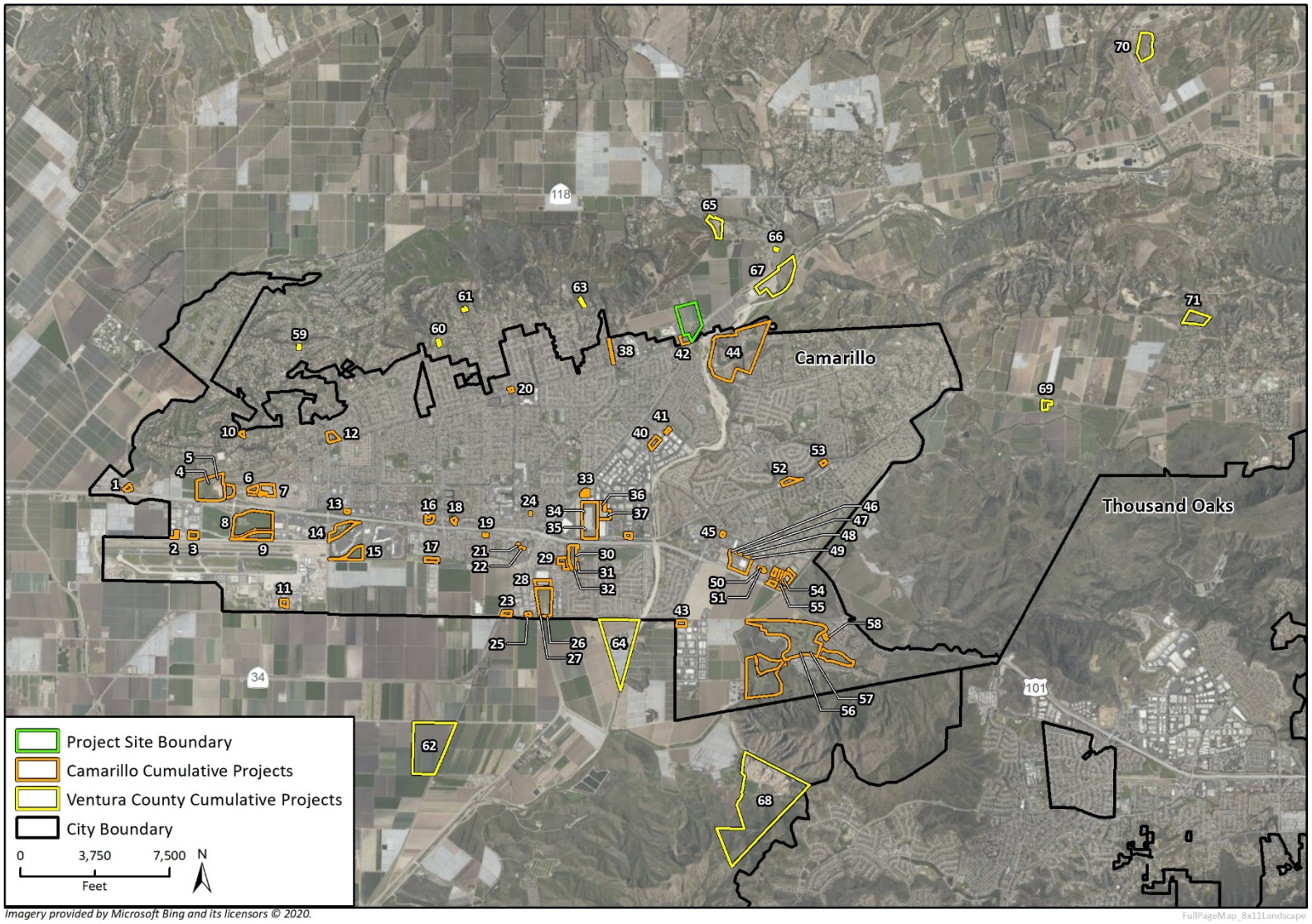
Project No.	Case No.[1]	Project Location[2]	Land Use
66	PL19-0078	3356 Somis Road	Fire Station No. 57 expansion and improvements
67	PL15-0014	3100 Somis Road	General Plan amendment for continued use, operation, and expansion of a wholesale lumber yard
68	PL20-0003	4800 North Street	Continued use of an existing wireless communications facility
69	PL19-0125	8626 Santa Rosa Road	Expanded use of existing outdoor event venue
70	PL18-0109	5500 Grimes Canyon Road	Dog kennel and sales facility
71	SD4410	APN 5500030020	Subdivision of five residential lots into 15 lots

[1] See Figure 3-1 for the locations of the cumulative projects in reference to the proposed project site.

[2] Assessor Parcel Numbers or a location description is provided when an address is not available.

Sources: County 2020 and City of Camarillo 2020

Figure 3-1 Cumulative Projects



4 Environmental Impact Analysis

This section discusses the possible environmental effects of the Somis Ranch Farmworker Housing Complex for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. A "significant effect" as defined by the *CEQA Guidelines* Section 15382:

> means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are those criteria adopted by the County and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each impact under consideration for an issue area is separately listed in bold text with the discussion of the impact and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the *CEQA Guidelines*.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the *CEQA Guidelines*.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. Mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where implementation of the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other planned and pending developments in the area listed in Section 3, *Environmental Setting*.

The Executive Summary of this EIR summarizes all impacts and mitigation measures that apply to the proposed project.

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4.1 Air Quality

This section analyzes the effects of the proposed project on air quality. It considers both the temporary impacts relating to construction activity and potential long-term impacts associated with project operation. The analysis in this section is based in part on modeling using the California Emissions Estimator Model (CalEEMod); modeling outputs are included in Appendix C of this EIR.

4.1.1 Setting

4.1.1.1 Existing Air Quality Setting

Local Climate and Meteorology

The project site is located in the South Central Coast Air Basin (Basin), which covers San Luis Obispo, Santa Barbara, and Ventura counties. The Ventura County Air Pollution Control District (VCAPCD) monitors and regulates the local air quality in Ventura County and manages the Air Quality Management Plan (AQMP). The analysis presented in this section is based upon information found in the Ventura County Air Quality Assessment Guidelines, adopted by the VCAPCD in 2003.

Air quality is affected by stationary sources (e.g., industrial uses and oil and gas operations) and mobile sources (e.g., motor vehicles). Air quality at a given location is a function of several factors, including the quantity and type of pollutants emitted locally and regionally, and the dispersion rates of pollutants in the region. Primary factors affecting pollutant dispersion are wind speed and direction, atmospheric stability, temperature, the presence or absence of inversions, and topography. The project site is located in the southeastern portion of the Basin, which has moderate variability in temperatures, tempered by coastal processes. The air quality in the Basin is influenced by a wide range of emission sources, such as dense population centers, heavy vehicular traffic, industry, and weather.

Air Quality Standards

The U.S. Environmental Protection Agency (USEPA) has set primary national ambient air quality standards (NAAQS) for ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), Particulate Matter (PM_{10}, $PM_{2.5}$), and lead (Pb). Primary standards are those levels of air quality deemed necessary, with an adequate margin of safety, to protect public health. In addition, California has established health-based ambient air quality standards (CAAQS) for these and other pollutants, some of which are more stringent than federal standards. Table 4.1-1 lists the current federal and state standards for regulated pollutants.

If the standards are met, the Basin is classified as being in "attainment." If the standards are not met, the Basin is classified as being in "nonattainment," and the local air pollution control district is required to develop strategies to meet the standards. According to the California Air Resources Board (CARB) Area Designation Maps, the project site is located in a region identified as being in nonattainment for ozone NAAQS and CAAQS and nonattainment for particulate matter less than 10 microns in diameter (PM_{10}) CAAQS (CARB 2019). In February 2017, the VCAPCD adopted the 2016 Ventura County AQMP, which provides a strategy for the attainment of federal ozone standards (VCAPCD 2017).

Table 4.1-1 Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	Federal Primary Standards	California Standard
Ozone	1-Hour	-	0.09 ppm
	8-Hour	0.070 ppm	0.070 ppm
Carbon Monoxide	8-Hour	9.0 ppm	9.0 ppm
	1-Hour	35.0 ppm	20.0 ppm
Nitrogen Dioxide	Annual	0.053 ppm	0.030 ppm
	1-Hour	0.100 ppm	0.18 ppm
Sulfur Dioxide	24-Hour	-	0.04 ppm
	1-Hour	0.075 ppm	0.25 ppm
PM_{10}	Annual	-	20 $\mu g/m^3$
	24-Hour	150 $\mu g/m^3$	50 $\mu g/m^3$
$PM_{2.5}$	Annual	12 $\mu g/m^3$	12 $\mu g/m^3$
	24-Hour	35 $\mu g/m^3$	-
Lead	30-Day Average	-	1.5 $\mu g/m^3$
	3-Month Average	0.15 $\mu g/m^3$	-

ppm = parts per million, $\mu g/m^3$ = micrograms per cubic meter

Source: CARB 2016

Air Pollutants of Primary Concern

The federal and state clean air acts mandate the control and reduction of certain air pollutants. Under these laws, USEPA and CARB have established ambient air quality standards for certain "criteria" pollutants. Ambient air pollutant concentrations are affected by the rates and distributions of corresponding air pollutant emissions, and by the climate and topographic influences discussed above. A discussion of each primary criteria pollutant is provided below.

Ozone

Ozone is produced by a photochemical reaction (i.e., triggered by sunlight) between nitrogen oxides (NO_X) and reactive organic gases (ROG).[3] NO_X is formed during the combustion of fuels, while reactive organic gases are formed during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in substantial concentrations between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

[3] Organic compound precursors of ozone are routinely described by variations of three terms: hydrocarbons (HC), organic gases (OG), and organic compounds (OC). These terms are often modified by adjectives such as total, reactive, or volatile, and result in a rather confusing array of acronyms. Those important from an air quality perspective are: HC, THC (total hydrocarbons), RHC (reactive hydrocarbons), ROG (reactive organic gases), ROC (reactive organic compounds), and VOC (volatile organic compounds). VCAPCD uses the term ROC to denote organic precursors.

Carbon Monoxide

CO is an odorless, colorless gas and causes a number of health problems including fatigue, headache, confusion, and dizziness. The incomplete combustion of petroleum fuels in on-road vehicles and at power plants is a major cause of CO. CO is also produced during the winter from wood stoves and fireplaces. CO tends to dissipate rapidly into the atmosphere; consequently, violations of the state CO standards are associated generally with major roadway intersections during peak-hour traffic conditions.

Localized CO "hotspots" can occur at intersections with heavy peak-hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high that the local CO concentration exceeds the NAAQS of 35.0 parts per million (ppm) or the CAAQS of 20.0 ppm.

Nitrogen Dioxide

Nitrogen dioxide (NO_2) is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. Nitric oxide is the principal form of nitrogen oxide produced by combustion, but nitric oxide reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. Nitrogen dioxide is an acute irritant. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis may occur in young children at concentrations below 0.3 ppm. Nitrogen dioxide absorbs blue light and causes a reddish brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM_{10} and acid rain.

Suspended Particulate Matter

Suspended particulate matter (PM_{10}) is particulate matter measuring no more than 10 microns in diameter; $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates, and sulfates. Both PM_{10} and $PM_{2.5}$ are by-products of fuel combustion and wind erosion of soil and unpaved roads, and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter) and fine particulates (those 2.5 microns and below) can be very different. The small particulates generally come from windblown dust and dust kicked up by mobile sources. The fine particulates are generally associated with combustion processes, and form in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an adsorbed toxic substance.

Toxic Air Contaminants

The California Health and Safety Code defines a toxic air contaminant (TAC) as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines. According to CARB, diesel engine emissions are believed to be responsible for about 70 percent of California's estimated known cancer risk attributable to TACs and they make up about 8 percent of outdoor $PM_{2.5}$ (CARB 2019).

Lead

Lead (Pb) is a metal found in the environment and in manufacturing products. The major sources of Pb emissions historically have been mobile and industrial sources. In the early 1970s, the USEPA set national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The USEPA completed the ban on the use of leaded gasoline in highway vehicles in December 1995. As a result of the USEPA's regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades. The most dramatic reductions in lead emissions occurred prior to 1990 due to the removal of lead from gasoline sold for most highway vehicles. Lead emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least in part as a result of national emissions standards for hazardous air pollutants (USEPA 2014). Because of the phase out leaded gasoline, metal processing is now the primary source of lead emissions. The highest level of lead in the air is found generally near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers.

Current Ambient Air Quality

The VCAPCD operates a network of air quality monitoring stations throughout the Basin that measure ambient concentrations of pollutants and determine whether ambient air quality meets federal and state standards. The monitoring station closest to the project site is the El Rio-Rio Mesa School #2 monitoring station, which is located approximately 7.5 miles east of the project site. Table 4.1-2 indicates the number of days each air quality standard was exceeded at the Rio Mesa School #2 station for years in which data is available. As shown therein, the state and federal eight-hour ozone standard was exceeded in 2016 and 2017; the federal PM_{10} and $PM_{2.5}$ standards were exceeded in 2017 and 2018; and the state PM_{10} standard was exceeded each year from 2016 to 2018.

Table 4.1-2 Ambient Air Quality at the Mira Loma Van Buren Monitoring Station

Pollutant	2016	2017	2018
8-Hour Ozone (ppm), 8-Hr Maximum	0.071	0.071	0.062
Number of Days of State exceedances (>0.070)	1	1	0
Number of days of Federal exceedances (>0.070)	1	1	0
Ozone (ppm), Worst Hour	0.084	0.084	0.072
Number of days of State exceedances (>0.09 ppm)	0	0	0
Number of days of Federal exceedances (>0.112 ppm)	0	0	0
Nitrogen Dioxide (ppb) - Worst Hour	33.0	36.0	49.0
Number of days of State exceedances (>0.18 ppm)	0	0	0
Number of days of Federal exceedances (0.10 ppm)	0	0	0
Particulate Matter 10 microns, mg/m^3, Worst 24 Hours	105.0	287.9	209.0
Number of days above Federal standard (>150 mg/m^3)	0	1	2
Number of days above State standard (>50 mg/m^3)	14	29	21
Particulate Matter <2.5 microns, mg/m^3, Worst 24 Hours	22.7	81.3	41.2
Number of days above Federal standard (>35 mg/m^3)	0	4	1

Source: CARB 2020

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with a margin of safety, to protect public health and welfare. They are designed to protect segment of the public that are most susceptible to respiratory distress, such as children under 14, the elderly over 65, persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. The majority of sensitive receptor locations are, therefore, schools, hospitals, and residences. The sensitive receptors nearest to the project site are Rancho Campana High School, located immediately adjacent to the west, and single-family residences located 250 feet to the southeast across Somis Road.

San Joaquin Valley Fever

San Joaquin Valley Fever (Valley Fever), formally known as Coccidioidomycosis, is an infectious disease caused by the fungus *Coccidioides immitis*. Valley Fever is a disease of concern in the Basin. Infection is caused by inhalation of *Coccidioides immitis* spores that have become airborne when dry, dusty soil or dirt is disturbed by natural processes, such as wind or earthquakes, or by human-induced ground-disturbing activities, such as construction, farming, or other activities (VCAPCD 2003). From 2012 to 2017, the number of cases of Valley Fever reported in California averaged 4,314 per year, with an average of 87 cases per year reported in Ventura County (California Department of Public Health 2018).

4.1.1.2 Regulatory Setting

Federal Regulations

Federal Clean Air Act

The USEPA is charged with implementing national air quality programs. USEPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA), passed in 1963 by the U.S. Congress and amended several times. The 1970 federal CAA amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including non-attainment requirements for areas not meeting NAAQS and the Prevention of Significant Deterioration program. The 1990 federal CAA amendments represent the latest in a series of federal efforts to regulate air quality in the United States. The federal CAA allows states to adopt more stringent standards or to include additional pollution species.

National Ambient Air Quality Standards

The federal CAA requires USEPA to establish primary and secondary NAAQS for a number of criteria air pollutants. The air pollutants for which standards have been established are considered the most prevalent air pollutants known to be hazardous to human health. NAAQS have been established for ozone, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and Pb.

State Regulations

California Clean Air Act

The California CAA, signed into law in 1988, requires all areas of the state to achieve and maintain the CAAQS by the earliest practical date. CARB is the state air pollution control agency and is a part of CalEPA. CARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California, and for implementing the requirements of the California CAA. CARB overseas local district compliance with federal and California laws, approves local air quality plans, submits the state implementation plans to the USEPA, monitors air quality, determines and updates area designations and maps, and sets emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

California Ambient Air Quality Standards

The California CAA requires CARB to establish CAAQS. Similar to the NAAQS, CAAQS have been established for ozone, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, Pb, vinyl chloride, hydrogen sulfide, sulfates, and visibility-reducing particulates. In most cases, the CAAQS are more stringent than the NAAQS. The California CAA requires all local air districts to endeavor to achieve and maintain the CAAQS by the earliest practical date. The California CAA specifies that local air districts should focus particular attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

Assembly Bill 1493

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (Pavley), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of greenhouse gas (GHG) emissions from motor vehicles." On June 30, 2009, USEPA granted the waiver

of CAA preemption to California for its GHG standards for motor vehicles beginning with the 2009 model year. Pavley I took effect for model years starting in 2009 to 2016 and Pavley II, which is now referred to as "LEV (Low Emission Vehicle) III GHG" will cover 2017 to 2025. Fleet average emission standards would reach 22 percent reduction from 2009 levels by 2012 and 30 percent by 2016. The Advanced Clean Cars program coordinates the goals of the LEV, Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs and would provide major reductions in GHG emissions. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels.

Regional and Local Regulations

Ventura County Air Pollution Control District

As noted previously, the project site is within the jurisdiction of the VCAPCD, which has adopted *Air Quality Assessment Guidelines* (2003) for quantifying and determining the significance of air quality emissions. Thresholds of significance contained in the *Air Quality Assessment Guidelines* are discussed in Section 4.1.3.

The VCAPCD also implements rules and regulations for emissions generated by various uses and activities. The rules and regulations detail pollution-reduction measures, which must be implemented during construction and operation of projects. Relevant rules and regulations to the project include those listed below.

- **Rule 50 (Opacity)**
  - This rule sets opacity standards on the discharge from sources of air contaminants. This rule would apply during construction of the proposed project.
- **Rule 51 (Nuisance)**
  - This rule prohibits any person from discharging air contaminants or any other material from a source that would cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public or which endangers the comfort, health, safety, or repose to any considerable number of persons or the public. The rule would apply during construction and operational activities.
- **Rule 55 (Fugitive Dust)**
  - This rule requires fugitive dust generators, including construction and demolition projects, to implement control measures limiting the amount of dust from vehicle track-out, earth moving, bulk material handling, and truck hauling activities. The rule would apply during construction and operational activities.
- **Rule 55.1 (Paved Roads and Public Unpaved Roads)**
  - This rule requires fugitive dust generators to begin the removal of visible roadway accumulation within 72 hours of any written notification from the VCAPCD. The use of blowers is expressly prohibited under any circumstances. This rule also requires controls to limit the amount of dust from any construction activity or any earthmoving activity on a public unpaved road. This rule would apply throughout all construction activities.
- **Rule 55.2 (Street Sweeping Equipment)**
  - This rule requires the use of PM_{10} efficient street sweepers for routine street sweeping and for removing vehicle track-out pursuant to Rule 55. This rule would apply during all construction activities.

Ventura County General Plan

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goals 1.2.1-1 and 1.2.1-2 and Policies 1.2.2-1 through 1.2.2-3 and 1.2.2-5 pertain to air quality.

- **Goals**
  - **1.2.1-1.** Diligently seek and promote a level of air quality that protects public health, safety, and welfare, and seek to attain and maintain the State and Federal Ambient Air Quality standards.
  - **1.2.1-2.** Ensure that any adverse air quality impacts, both long-term and short-term, resulting from discretionary development are mitigated the maximum extent feasible.
- **Policies**
  - **1.2.2-1.** Discretionary development that is inconsistent with the Air Quality Management Plan (AQMP) shall be prohibited, unless overriding considerations are cited by the decision-making body.
  - **1.2.2-2.** The air quality impacts of discretionary development shall be evaluated by use of the Guidelines for the Preparation of Air Quality Impact Analysis.
  - **1.2.2-3.** Discretionary development that would have a significant adverse air quality impact shall only be approved if it is conditioned with all reasonable mitigation measures to avoid, minimize, or compensate (offset) for the air quality impact. Developers shall be encouraged to employ innovative methods and technologies to minimize air pollution impacts.
  - **1.2.2-5.** Development subject to APCD permit authority shall comply with all applicable APCD rules and permit requirements, including the use of best available control technology (BACT) as determined by the APCD.

Additionally, several Elements of the Draft Ventura County 2040 General Plan recognize the importance of achieving regional air quality objectives. The Draft Plan includes the following additional policies related to air quality:

CIRCULATION, TRANSPORTATION, AND MOBILITY ELEMENT

- **Policy CTM-2.11: Efficient Land Use Patterns.** The County shall establish land use patterns that promote shorter travel distances between residences, employment centers, and retail and service-oriented uses to support the use of public transportation, walking, bicycling, and other forms of transportation that reduce reliance on single-passenger automobile trips.
- **Policy CTM-4.1: Reduce VMT.** The County shall work with Caltrans and VCTC to reduce VMT by:
  - facilitating the efficient use of existing transportation facilities,
  - striving to provide viable modal choices that make driving alone an option rather than a necessity,
  - supporting variable work schedules to reduce peak period VMT, and
  - providing more direct routes for pedestrians and bicyclists
- **Policy CTM-4.2: Alternative Transportation.** The County shall encourage bicycling, walking, public transportation, and other forms of alternative transportation to reduce VMT, traffic congestion, and greenhouse gas emissions.

- **Policy CTM-6.1: Routine Use of Alternative Transportation Options.** The County shall support the integration of emerging technologies that increase the routine use of alternative transportation options to decrease single-passenger automobile travel.

PUBLIC FACILITIES, SERVICES, AND INFRASTRUCTURE ELEMENT

- **Policy PFS-2.5: County Employee Trip Reduction.** The County shall encourage its employees to reduce the number and distance of single-occupancy vehicle work trips.
- **Policy PFS-2.6: County Alternative Fuel Vehicle Purchases.** The County shall review market-available technologies for alternative fuel vehicles and prioritize purchase of vehicles to reduce greenhouse gas emissions where economically feasible.

HAZARDS AND SAFETY ELEMENT

- **Policy HAZ-10.1: Air Pollutant Reduction.** The County shall strive to reduce air pollutant from stationary and mobile sources to protect human health and welfare, focusing efforts on shifting patterns and practices that contribute to the areas with the highest pollution exposures and health impacts.
- **Policy HAZ-10.2: Air Quality Management Plan Consistency.** The County shall prohibit discretionary development that is inconsistent with the most recent adopted AQMP, unless the Board of Supervisors adopts a statement of overriding considerations.
- **Policy HAZ-10.3: Air Pollution Control District Rule and Permit Compliance.** The County shall ensure that discretionary development subject to VCAPCD permit authority complies with all applicable APCD rules and permit requirements, including the use of Best Available Control Technology (BACT) as determined by the VCAPCD.
- **Policy HAZ-10.4: Engagement with Air Quality Management Plan.** When the VCAPCD updates the AQMP, the County shall actively engage continuously and throughout the process.
- **Policy HAZ-10.5: Air Pollution Impact Mitigation Measures for Discretionary Development.** The County shall work with applicants for discretionary development projects to incorporate bike facilities, solar water heating, solar space heating, incorporation of electric appliances and equipment, and the use of zero and/or near zero emission vehicles and other measures to reduce air pollution impacts and reduce greenhouse gas emissions.
- **Policy HAZ-10.6: Transportation Control Measures Programs.** The County shall continue to work with the VCAPCD and VCTC to develop and implement Transportation Control Measures (TCM) programs consistent with the AQMP to facilitate public transit and alternative transportation modes within the county.
- **Policy HAZ-10.7: Fuel Efficient County Vehicles.** When purchasing new County vehicles, the County shall give strong preference to fuel efficient vehicles, include the use of zero emission vehicles when feasible.
- **Policy HAZ-10.8: Alternative Transportation Modes.** The County shall promote alternative modes of transportation that reduce single-occupancy vehicle (SOV) travel and enhance "last-mile" transportation options to improve air quality.
- **Policy HAZ-10.9: Mitigation of Objectionable Odors.** The County shall require that discretionary development which will create objectionable odors that could affect a substantial number of people are appropriately mitigated. The project, pursuant to state law, shall be required to operate in accordance with the Rules and Regulations of the VCAPCD, with emphasis on Rule 51, Nuisance throughout the life of the permit.

- **Policy HAZ-10.11: Air Quality Assessment Guidelines.** In evaluating air quality impacts, the County shall consider total emissions from both stationary and mobile sources, as required by the California Environmental Quality Act. The County shall evaluate discretionary development for air quality impacts using the Air Quality Assessment Guidelines as adopted by the Ventura County Air Pollution Control District (APCD), except that emissions from APCD-permitted sources shall also be included in the analysis. The County shall revise the Initial Study Assessment Guidelines to implement this policy.
- **Policy HAZ-10.12: Conditions for Air Quality Impacts.** The County shall require that discretionary development that would have a significant adverse air quality impact shall only be approved if it is conditioned with all reasonable mitigation measures to avoid, minimize or compensate (offset) for the air quality impact. The use of innovative methods and technologies to minimize air pollution impact shall be encouraged in project design.

4.1.2 Impact Analysis

4.1.2.1 Significance Thresholds

Significance Thresholds

Per the Initial Study Assessment Guidelines (County 2011), impacts related to air quality would be potentially significant if the proposed project would:

1. Exceed any of the thresholds set forth in the air quality assessment guidelines as adopted and periodically updated by the VCAPCD, or be inconsistent with the Air Quality Management Plan; and/or
2. Be inconsistent with the applicable General Plan Goals and Policies for "Air Quality" in the County's Initial Study Assessment Guidelines.

The VCAPCD (2003) has adopted *Air Quality Assessment Guidelines* for quantifying and determining the significance of air quality emissions. Thresholds of significance contained in the *Air Quality Assessment Guidelines* include:

- The VCAPCD considers operational air quality impacts to be significant if the project would generate more than 25 pounds per day of the ozone precursors ROC or NO_X.
- The VCAPCD states that construction-related emissions of ROC and NO_X are not counted toward the two significance thresholds above, since these emissions are temporary. However, construction-related emissions should be mitigated if estimates of ROC and NO_X emissions from the heavy-duty construction equipment anticipated to be used for a particular project exceed the 25 pounds per day threshold.
- A project with operational emissions in excess of two pounds per day of ROC or NO_X that is found inconsistent with the Air Quality Management Plan (AQMP) would have a cumulatively considerable contribution to a significant cumulative air quality impact. Inconsistent projects are typically those that cause the existing population to exceed the population forecasts contained in the most recently adopted AQMP.
- The VCAPCD has not established quantitative thresholds for particulate matter for either construction or operation. However, the VCAPCD states a project would have a significant impact if it would be reasonably expected to generate fugitive dust emissions in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which may endanger the comfort, repose, health, or safety of any such person

or the public. The VCAPCD recommends implementation of fugitive dust measures described in Section 7.4.1 of the *Air Quality Assessment Guidelines* as part of all project-related dust-generating operations and activities.

- The VCAPCD has not established quantitative thresholds for CO for either construction or operation. However, the VCAPCD states that a CO hotspot screening analysis should be conducted for any project with indirect CO emissions greater than the applicable ozone project significance thresholds (i.e., 25 pounds per day) that may significantly impact roadway intersections currently operating at, or that are expected to operate at, Level of Service (LOS) E or F. A CO hotspot screening analysis should also be conducted for any project-impacted roadway intersection at which a CO hotspot might occur. If project emissions do not meet these criteria, then the project would have a less than significant impact related to CO hotspots.
- A project would result in significant impacts from odor emissions if it may reasonably be expected to generate odorous emissions in such quantities as to cause detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which may endanger the comfort, repose, health, or safety of any such person or the public, or which may cause, or have a natural tendency to cause, injury or damage to business or property.

Methodology

Criteria pollutant emissions for project construction and operation were calculated using CalEEMod, Version 2016.3.2. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. The model was developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California air districts. CalEEMod allows for the use of default data (e.g., emission factors, trip lengths, meteorology, source inventory) provided by the various California air districts to account for local requirements and conditions, and/or user-defined inputs. The model calculates criteria pollutant emissions of CO, PM_{10}, $PM_{2.5}$, SO_2, and the ozone precursors, ROG and NO_X. The calculation methodology and input data used in CalEEMod can be found in the CalEEMod User's Guide Appendices A, D, and E (CAPCOA 2017). The input data and subsequent construction and operation emission estimates for the proposed project are discussed below. CalEEMod output files for the project are included in Appendix C to this report.

Construction Emissions

Project construction would primarily generate temporary criteria pollutant emissions from construction equipment operation on-site, construction worker vehicle trips to and from the site, and export of materials off-site. Construction input data for CalEEMod include, but are not limited to: (1) the anticipated start and finish dates of construction activity; (2) inventories of construction equipment to be used; (3) areas to be excavated and graded; and (4) volumes of materials to be exported from and imported to the project site. The analysis assessed maximum daily emissions from individual construction activities, including site preparation, grading, building construction, paving, and architectural coating. Construction would require heavy equipment during site preparation, grading, building construction, and paving. Construction equipment estimates are based on surveys of construction projects in California conducted by members of CAPCOA. Approximately 1,500 cubic yards of soil would be cut and 35,100 cubic yards would be filled during project construction, with 33,600 cubic yards imported to the project site. Construction was modeled over three phases, with the soil import split across grading activities of three phases.

The quantity, duration, and the intensity of construction activity influences the amount of construction emissions and their related pollutant concentrations that occur at any one time. The emission forecasts modeled for this report reflect conservative assumptions where a relatively large amount of construction is occurring in a relatively intensive manner. If construction is delayed or occurs over a longer period, emissions could be reduced because of (1) a more modern and cleaner-burning construction equipment fleet mix than assumed in the CalEEMod, and/or (2) a less intensive buildout schedule (i.e., fewer daily emissions occurring over a longer time interval).

CalEEMod can calculate reductions in construction emissions from the effects of dust control, diesel-engine classifications, and other selected emissions reduction measures. Emissions calculations assume application of water twice daily and a 15-mph speed limit on unpaved surfaces in compliance with VCAPCD Rule 55. Based on CalEEMod version 2016.3.2, the PM_{10} and $PM_{2.5}$ reduction for watering twice per day is 55 percent.

Operational Emissions

In CalEEMod, operational sources of criteria pollutant emissions include area, energy, and mobile sources.

ENERGY SOURCES

Emissions from energy use include natural gas use. The emissions factors for natural gas combustion are based on EPA's AP-42 (*Compilation of Air Pollutant Emissions Factors*) and California Climate Action Registry (CCAR) General Reporting Protocol (CCAR 2009).

AREA SOURCES

Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coating were calculated in CalEEMod and utilize standard emission rates from CARB, U.S. EPA, and emission factor values provided by the local air district (CAPCOA 2017).

MOBILE SOURCES

Mobile source emissions are generated by the increase in vehicle trips to and from the project site associated with operation of onsite development. Vehicle trips for the project inputted into the model were taken from the project's Traffic Study (ATE 2020).

4.1.2.2 Project Impacts and Mitigation Measures

Threshold 1:	Would the project exceed any of the thresholds set forth in the air quality assessment guidelines as adopted and periodically updated by the VCAPCD, or be inconsistent with the Air Quality Management Plan?

IMPACT AQ-1 EMISSIONS ASSOCIATED WITH PROJECT CONSTRUCTION WOULD BE LESS THAN SIGNIFICANT. HOWEVER, BECAUSE ROC AND NOX EMISSIONS WOULD EXCEED 25 POUNDS PER DAY, IMPLEMENTATION OF MITIGATION MEASURE AQ-1 IS RECOMMENDED.

Table 4.1-3 summarizes the estimated maximum daily emissions of pollutants associated with project construction. The VCAPCD's 25 pounds per day thresholds for ROC and NO_X do not apply to construction emissions because such emissions are temporary. Therefore, construction air quality impacts would be less than significant. However, as stated in Section 4.1.2.1, *Significance Thresholds*, VCAPCD recommends that mitigation be required if ROC and NO_X emissions exceed 25 pounds per day.

Table 4.1-3 Estimated Maximum Construction Emissions

	ROC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Maximum Construction Emissions (lbs/day)	75	54	33	<1	10	6

ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; lbs/day = pounds per day

See Appendix C for model output results.

Construction-related air quality impacts would be less than significant. As shown in Table 4.1-3, ROC and NO_X emissions would exceed 25 pounds per day. Therefore, per VCAPCD's Guidelines, Mitigation Measure AQ-1 is recommended to reduce project construction emissions to below 25 pounds per day of ROC and NO_X.

With respect to fugitive dust emissions, the VCAPCD states that significant construction-related air quality impacts result if fugitive dust emissions are generated in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which may endanger the comfort, repose, health, or safety of any such person or the public. For construction impacts, the VCAPCD recommends minimizing fugitive dust through dust control measures. Fugitive dust control measures are required by VCAPCD Rule 55. Such measures include securing tarps over truck loads, removing vehicle track-out using PM_{10} efficient sweepers, and watering bulk material to minimize fugitive dust. As a result, compliance with Rule 55 would ensure that construction emissions would not be generated in such quantities as to cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that may endanger the comfort, repose, health, or safety of any such person or the public. Impacts from fugitive dust emissions would be less than significant.

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness or that may pose a present or potential hazard to human health. Emissions of TACs may occur from construction or operation of a project.

Construction-related activities would result in short-term, project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation grading, building construction, and other construction activities. DPM was identified as a toxic air contaminant (TAC) by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts (CARB 2017). At this time, VCAPCD has not adopted a methodology for analyzing such impacts.

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over approximately five years. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the OEHHA, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period (assumed to be the approximate time that a person spends in a household). OEHHA recommends this risk be bracketed with 9-year and 70-year exposure periods. Health risk assessments should be limited to the period/duration of activities associated with the project.

The maximum $PM_{2.5}$ emissions, which is used to represent DPM emissions for this analysis, would occur during site preparation and grading activities. While site preparation and grading emissions represent the worst-case condition, such activities would only occur for about six months, less than 25 percent of the overall construction period and less than five percent, one percent, and 0.5 percent of the typical health risk calculation period of 9 years, 30 years, and 70 years, respectively. $PM_{2.5}$ emissions would decrease for the remaining construction period because construction activities such as building construction and paving would require less construction equipment. Therefore, given the aforementioned, DPM generated by project construction is not expected to create conditions where the probability that the Maximally Exposed Individual would contract cancer is greater than 10 in one million or to generate ground-level concentrations of noncarcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual. This impact would be less than significant.

Mitigation Measure

Mitigation Measure AQ-1 is recommended to reduce construction emissions of ROC and NO_X in accordance with VCAPCD guidance.

AQ-1 ROC and NO_X Construction Reduction Measures

Per the VCAPCD Guidelines, when construction emissions exceed 25 pounds per day for ROC and NO_X, the following measures shall be implemented:

- Minimize equipment idling time.
- Maintain equipment engines in good condition and in proper tune as per manufacturers' specifications.
- Lengthen the construction period during smog season (May through October) to minimize the number of vehicles and equipment operating at the same time.

- Use alternatively fueled construction equipment, such as compressed natural gas, liquefied natural gas, or electric, if feasible.
- In addition, per recent VCAPCD guidance on other projects, project construction shall use Tier 3 or above construction equipment for all off-road diesel equipment that has greater than 50 horsepower. A copy of each unit's certified tier specification shall be provided at the time of mobilization of each applicable unit of equipment.

Significance After Mitigation

Air pollutant emissions impacts associated with project construction would be less than significant. Nevertheless, Mitigation Measure AQ-1 is recommended to reduce construction emissions of ROC and NO_X accordance with VCAPCD guidance. Project construction emissions with implementation of recommended Mitigation Measure AQ-1 are shown in Table 4.1-4. As shown in the table, emissions of NO_X would be reduced approximately 30 percent and ROC by approximately 1 percent from the use of Tier 3 equipment as compared to no specified tier. The VCAPCD does not require a project to mitigate below 25 pounds per day and instead requires the implementation of the specified measures outlined in recommended Mitigation Measure AQ-1. Therefore, implementation of recommended Mitigation Measure AQ-1 would further reduce impacts that are already less than significant due to their temporary nature to the maximum degree feasible.

Table 4.1-4 Project Construction Emissions - Mitigated

	Maximum Daily Emissions (lbs/day)					
Emission Source	**ROC**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Construction Emissions – Unmitigated	75	54	33	<1	10	6
Construction Emissions – Mitigated	74	38	39	<1	9	5
Percent Change	**-1%**	**-30%**	**+18%**	**0%**	**-10%**	**-17%**

ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; lbs/day = pounds per day, VCAPCD = Ventura County Air Pollution Control District

Note: See Appendix C for model output results.

Threshold 1: Would the project exceed any of the thresholds set forth in the air quality assessment guidelines as adopted and periodically updated by the VCAPCD, or be inconsistent with the Air Quality Management Plan?

IMPACT AQ-2 AIR POLLUTANT EMISSION IMPACTS ASSOCIATED WITH PROJECT OPERATION WOULD BE LESS THAN SIGNIFICANT.

Table 4.1-5 summarizes the project's operational emissions by emission source (area, energy, and mobile). As shown below, the emissions generated by operation of the proposed project would not exceed VCAPCD regional thresholds for ROC or NO_X. Impacts from the project's operational criteria pollutant emissions would be less than significant.

Table 4.1-5 Project Operational Emissions

Emission Source	Maximum Daily Emissions (lbs/day)					
	ROC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	7	<1	30	<1	<1	<1
Energy	<1	1	<1	<1	<1	<1
Mobile	3	12	39	<1	15	4
Emergency Generator	<1	<1	<1	<1	<1	<1
Total Project Emissions	10	14	69	<1	15	5
VCAPCD Thresholds	25	25	N/A	N/A	N/A	N/A
Threshold Exceeded?	**No**	**No**	**N/A**	**N/A**	**N/A**	**N/A**

ROC = reactive organic compounds, NO_X = nitrogen oxides, CO = carbon monoxide, SO_2 = sulfur dioxide, PM_{10} = particulate matter 10 microns in diameter or less, $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; lbs/day = pounds per day, VCAPCD = Ventura County Air Pollution Control District

N/A = Not available. The VCAPCD has not established recommended quantitative thresholds for CO, SO_2, PM_{10}, and $PM_{2.5}$.

Note: See Appendix C for model output results.

Toxic Air Contaminants

Operational TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. Operational equipment associated with the CWWTF and other project components would not generate TAC emissions because they would not involve use of substances known to emit TACs; therefore, no operational impacts from TAC emissions would occur.

Mitigation Measures

No mitigation is required.

Threshold 1: Would the project exceed any of the thresholds set forth in the air quality assessment guidelines as adopted and periodically updated by the VCAPCD, or be inconsistent with the Air Quality Management Plan?

IMPACT AQ-3 THE PROJECT WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS FROM CO HOTSPOTS, VALLEY FEVER, OR TACS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

CO Hot Spots

A CO hotspot is a localized concentration of CO that exceeds a CO ambient air quality standard. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 parts per million (ppm) or the federal and state eight-hour standard of 9.0 ppm. Ventura County is in conformance with state and federal

CO standards; no stations in Ventura County have monitored CO in the last 15 years because it is considered a non-issue. The VCAPCD recommends conducting a CO hotspot screening analysis for any project with indirect CO emissions greater than 25 pounds per day that may generate traffic that would significantly impact congestion levels at roadway intersections currently operating at, or that are expected to operate at, LOS E or F. As shown in Table 4.1-5, operation of the proposed project would generate approximately 39 pounds of indirect CO emissions (i.e., mobile source emissions) per day. However, per the project's Traffic Study (ATE 2020), under the existing plus project or cumulative plus project scenario, no analyzed intersections would operate at LOS E or F. Therefore, the project would not generate substantial traffic volumes that would cause or contribute to a CO hotspot or expose sensitive receptors to substantial pollutant concentrations related to CO hotspots. Impacts would be less than significant.

San Joaquin Valley Fever

Construction activities, including site preparation and grading, would have the potential to release *Coccidioides immitis* spores, which cause Valley Fever. the VCAPCD recommends consideration of the following factors that may indicate a project's potential to result in impacts related to Valley Fever (VCAPCD 2003):

- Disturbance of the top soil of undeveloped land (to a depth of about 12 inches)
- Dry, alkaline, sandy soils
- Virgin, undisturbed, non-urban areas
- Windy areas
- Archaeological resources probable or known to exist in the area (Native American midden sites)
- Special events (fairs, concerts) and motorized activities (motocross track, All Terrain Vehicle activities) on unvegetated soil (non-grass)
- Non-native population (i.e., out-of-area construction workers)

Construction of the Project would disturb areas that are disturbed in conjunction with farming activities. Due to the previous and continuous soil disturbance at the site, disturbance of soils during construction activities is unlikely to pose a substantial risk of infection. Furthermore, due to the size of the proposed project, 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. In addition, 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. Construction of the proposed project would also comply with VCAPCD Rule 55 (Fugitive Dust) to limit dust generation and movement. Therefore, construction of the proposed project would not result in a substantial increase in entrained fungal spores that cause Valley Fever above existing background levels and impacts related to Valley Fever would be less than significant.

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness or that may pose a present or potential hazard to human health. Emissions of TACs from construction and operation of the proposed project are previously discussed under Impact AQ-1 and Impact AQ-2. No impacts from TAC emissions would occur.

Mitigation Measures

No mitigation is required.

Threshold 1:	Would the project exceed any of the thresholds set forth in the air quality assessment guidelines as adopted and periodically updated by the VCAPCD, or be inconsistent with the Air Quality Management Plan?

IMPACT AQ-4 IMPLEMENTATION OF THE PROJECT WOULD NOT CREATE OBJECTIONABLE ODORS THAT COULD AFFECT A SUBSTANTIAL NUMBER OF PEOPLE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Based on the VCAPCD Air Quality Assessment Guidelines, a project may have a significant impact if it would generate an objectionable odor to a degree that would cause injury, detriment, nuisance, or annoyance to a considerable number of persons or to the public, or which would endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. Land uses and industrial operations known to emit objectionable odors include wastewater treatment facilities, food processing facilities, coffee roasters, fiberglass operations, refineries, feed lots/dairies, and composting facilities.

The project would include the CWWTF to provide wastewater treatment for the project. The primary source of odors associated with wastewater treatment plants is hydrogen sulfide (H_2S), which produces an odor similar to rotten eggs (Baranksi 2017). For the CWWTF, a vent port is supplied on the Anoxic Chamber for connection to an air scrubber that would incorporate advanced odor control technology. Air scrubbers would provide two stage chemistry for the control of odors from hydrogen sulfide (H_2S), mercaptans, ammonia, amines, and other odors generated in wastewater collection and treatment systems. The proposed treatment system is designed to achieve an H_2S reduction of 99 percent and would also remove a majority of volatile mercaptans, organic amines, and organic sulfurs. By removing these substances from vented air, this system would remove the primary contributors to odorous air, thereby minimizing the potential for objectionable odors to be released (Baranski 2017). With incorporation of these project design features, odors would not generate an objectionable odor to a degree that would cause injury, detriment, nuisance, or annoyance to a considerable number of persons or to the public, or that would endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. In addition, solid waste generated by the proposed on-site uses would be collected by a contracted waste hauler, ensuring that any odors resulting from on-site waste would be managed and collected in a manner to prevent the proliferation of odors. Operational odor impacts would be less than significant.

For construction activities, odors would be short-term in nature and are subject to SCAQMD Rule Construction activities would be temporary and transitory and associated odors would cease upon construction completion. Accordingly, the proposed project would not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 2:	Would the project be inconsistent with the applicable General Plan Goals and Policies for "Air Quality" in the County's Initial Study Assessment Guidelines?

IMPACT AQ-5 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would be consistent with the County General Plan goals and policies listed previously under Regulatory Setting. The project's consistency is analyzed in detail in Section 4.10, *Land Use and Planning*. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.1.2.3 Cumulative Impacts

The cumulative context for air quality is regional. The Basin is designated as being in nonattainment for ozone NAAQS and CAAQS and nonattainment for particulate matter less than 10 microns in diameter (PM_{10}) CAAQS; therefore, there are existing significant cumulative air quality impacts related to these pollutants. The Basin is in attainment of all other federal and state standards. The project would contribute particulate matter and the ozone precursors ROG and NO_X to the area during construction and operation.

In accordance with VCAPCD guidance, a project with emissions in excess of two pounds per day of ROC or NO_X that is found inconsistent with the AQMP would have a significant cumulative air quality impact. Inconsistent projects are typically those that cause the existing population to exceed the population forecasts contained in the most recently adopted AQMP (VCAPCD 2003). The VCAPCD adopted the 2016 Ventura County AQMP to demonstrate a strategy for and reasonable progress toward attainment of the federal 8-hour ozone standard. The 2016 Ventura County AQMP relies on the Southern California Association of Governments' (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) forecasts of regional population growth in its projections for managing Ventura County's air quality. The population growth forecasts in SCAG's 2016 RTP/SCS for the unincorporated Ventura County estimate that the population would increase from 96,700 in 2012 to 113,600 in 2040, for a population increase of 16,900. The increase in population from the project, estimated by CalEEMod at 1,102 persons, would be within the SCAG's projected 2040 population increase of 16,900 and the project would not cause the unincorporated Ventura County's population to exceed official regional population projections. As discussed under Impact AQ-3, operation of the project would generate emissions of ROC and NO_X that exceed two pounds per day. However, because the project's population would be within SCAG 2016 forecasts, the project would be consistent with the 2016 Ventura County AQMP. Therefore, the project would not have a cumulative considerable contribution to a cumulative air quality impact.

As identified under Impact AQ-3, the project would not have a significant impact from CO hotspots, TACs, or valley fever. Discussion of these impacts considers the cumulative nature of the pollutants in the region; e.g., the cancer risk and non-cancer risk thresholds have been set per existing cancer risks in the area and exceeding those thresholds would be considered a cumulative impact. Because the project would not have impacts exceeding those thresholds, it would not expose sensitive receptors to a cumulatively considerable amount of substantial pollutant concentrations from CO hotspots, TACs, or valley fever.

As identified under Impact AQ-4, the project would not have a significant impact from odor emissions. The consideration of cumulative odor impacts is limited to cases when projects constructed simultaneously are within a few hundred yards of each other because of the short range of odor dispersion. It is unlikely that project construction would occur within a few hundred yards of major off-site construction due to the developed nature of the existing area. Therefore, the project would not result in a cumulatively considerable odor impact.

4.2 Agricultural Resources – Soils

This section analyzes the proposed project's impacts to land designated as Prime, Statewide Importance, Unique, and/or Local Importance (defined as "Farmland" or "Important Farmland" in CEQA, pursuant to guidance in CEQA Section 21095 and CEQA Guidelines Appendix G, and the County).

4.2.1 Setting

4.2.1.1 Agricultural Context

Regional

Ventura County's temperate climate with warm, wet winters and hot, dry summers coupled with fertile soils, supports the cultivation of a diversity of agricultural commodities, including strawberries, celery, lemons, raspberries, avocados, nursery stock, tomatoes, peppers, cut flowers, cabbage, and kale. According to the State of California, Ventura County ranked eighth among California counties in total crop value in 2017 based on data from the County Agricultural Commissioner's Annual Crop and Livestock Report (County 2019a). The estimated gross value of Ventura County's agriculture for calendar year 2018 was approximately $2.1 billion.

Areas that sustain agricultural commodity growth have a broad range of characteristics. For example, berry production requires a temperate moist climate, so most strawberry production is found close to the coast, surrounding the cities of Ventura, Oxnard, Camarillo, and Port Hueneme. The climate tends to be dryer and warmer further from the coast, favoring citrus crops. Specifically, the U.S. Highway 126 and U.S. Highway 150 corridors are prime areas for citrus growth. Fertile soil combined with ideal temperate seasonal temperatures allow lemons, oranges, and mandarins to thrive. Some commodity types, such as avocados, can grow in a variety of climate regions, allowing them to flourish countywide (County 2019a).

Project Site

The 36.4-acre project site is currently used for agricultural production, specifically celery, cabbage, and strawberries. The project site is also adjacent to active agricultural fields to the north, northwest, and east. The project site is designated as Agricultural in County General Plan and is zoned as AE (Agricultural Exclusive). Agriculture infrastructure includes irrigation throughout the project site.

4.2.1.2 Agricultural Soils and Farmland Characteristics of the Project Site

The United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) assesses the agricultural capacity of soils through its utilization of the Land Capability Classification System and the Storie Index. Capability Classes provide insight into the suitability of a soil for field crop uses based on factors that include texture, erosion, wetness, permeability, and fertility. The Storie Index is a soil rating based on soil properties that govern a soil's potential for cultivated agriculture in California. The Storie Index assesses the productivity of a soil based on the following four characteristics:

- Factor A – degree of soil profile development
- Factor B – texture of the surface layer
- Factor C – slope
- Factor X – manageable features, including drainage, micro relief, fertility, acidity, erosion, and salt content

Under the California Revised Storie Index, these four factors translate into one of four soil grades: Grade 1 (excellent), Grade 2 (good), Grade 3 (fair) and Grade 4 (poor). In addition, the NRCS farmland classification identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops and identifies map units as "Prime Farmland, if irrigated," "Farmland of Statewide Importance" and "Not Prime Farmland." The project site includes California Revised Storie Index Grade 1 (excellent) soils, including Mocho Loam, 0-2 percent slopes; Sorrento silty clay loam, 0-2 percent slopes; and Pico Loam, sandy substratum, 0-2 percent slopes.

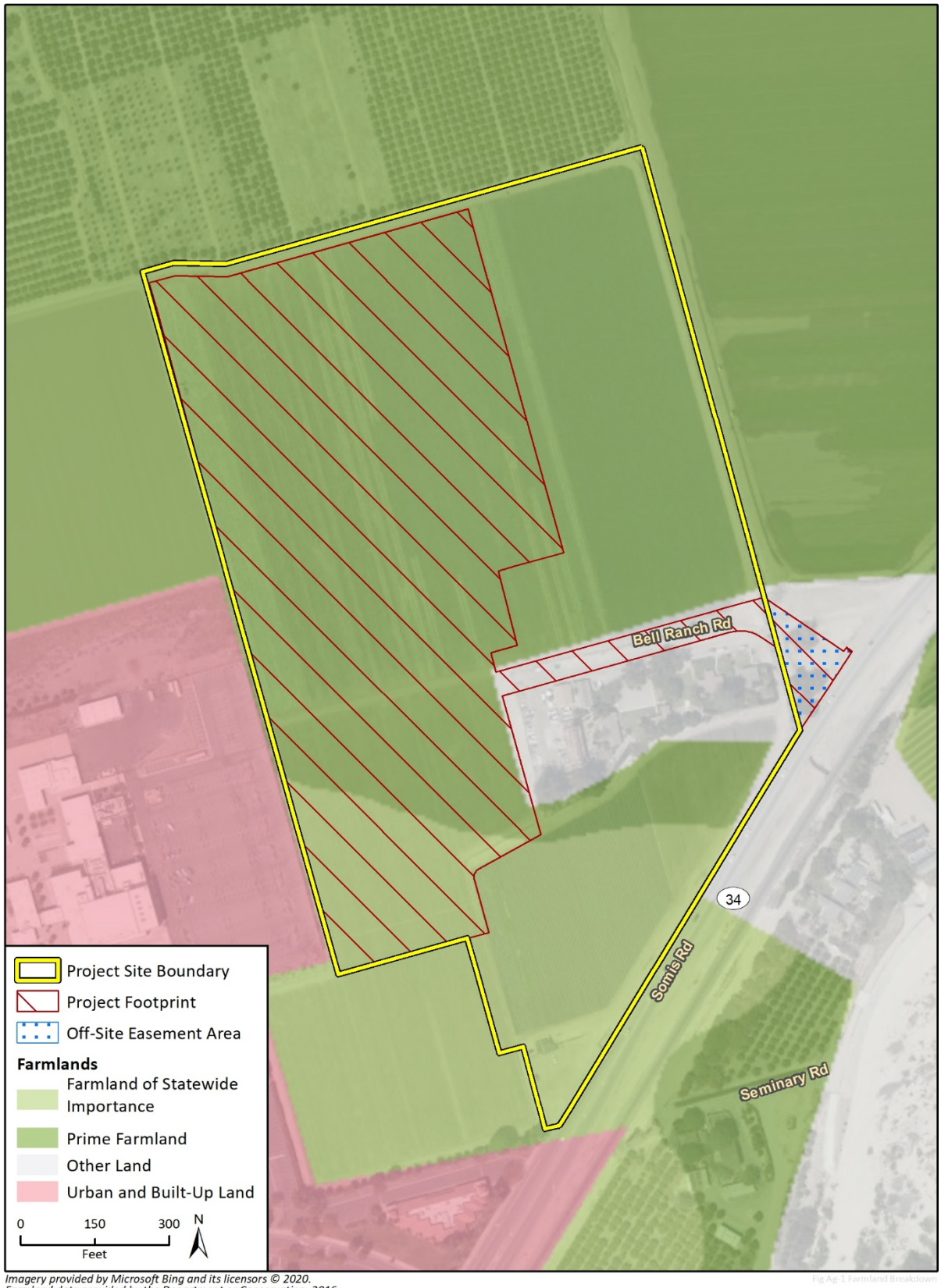
In addition to the NRCS system, the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) compiles Important Farmland maps for each county in the State. Maps and statistics are produced biannually using a process that integrates aerial photo interpretation, field mapping, a computerized mapping system, and public review. The FMMP Important Farmland differs from the NRCS farmland classification because the NRCS farmland classifications are based solely on soil quality, while the FMMP Important Farmland designations are based on both soil quality and current land use.

The Important Farmland types present on the project site include Prime Farmland and Farmland of Statewide Importance, which are defined by the FMMP as follows:

- **Prime Farmland:** The project site includes 26.1 acres of Prime Farmland, which is Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. The land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Farmland of Statewide Importance:** The project site includes 6.5 acres of Farmland of Statewide Farmland, which is Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

Table 4.2-1 summarizes the acreage of Important Farmland categories on the project site and Figure 4.2-1 shows the types of Important Farmland present on the project site.

Figure 4.2-1 Important Farmland on the Project Site



Imagery provided by Microsoft Bing and its licensors © 2020.
Farmland data provided by the Department or Conservation, 2016.

Fig Ag-1 Farmland Breakdown

Table 4.2-1 Important Farmland on the Project Site

Important Farmland Inventory Classification	On-Site Acreage
Prime Farmland	26.1
Farmland of Statewide Importance	6.5
Total	**32.6**

4.2.1.3 Regulatory Setting

State Regulations

California Department of Conservation Farmland Mapping and Monitoring Program

As previously discussed, the California DOC FMMP produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is categorized according to soil quality and irrigation status. The maps are updated every two years through the review of aerial photographs, a computer mapping system, public review, and field reconnaissance.

California Code of Regulations (Title 3 Food and Agriculture)

California Code of Regulations (CCR) Title 3, Sections 6000–6920 regulate the registration, management, use, and application of pesticides on agricultural lands. These regulations are enforced by the Ventura County Agricultural Commissioner's Office. Generally, specific regulations vary for each pesticide, its method of application, and use. However, Sections 6600 and 6614 contain some general regulations relating to the application of pesticide, as well as general standards of care and protection of persons, animals, and property.

California Land Conservation Act (Williamson Act) Contract

Preservation of agricultural, recreational, and open space lands through agricultural preserve contracts between the County and property owners is a technique encouraged by the State of California for implementing the general plan. Agricultural preserve contracts are executed through procedures enabled by the California Land Conservation Act of 1965, also known as the Williamson Act. A contract may be entered into for property with agricultural, recreational, and open space uses in return for decreased property taxes. Land Conservation Act contracts preserve agriculture and open space over a rolling term 10-year contract. The inclusion of a parcel in a Williamson Act contract is entirely voluntary and must have the consent of the property owner. The project site is not subject to a Land Conservation Act (Williamson Act) contract; therefore, this subject is not further discussed in this EIR.

Local Regulations

Ventura County General Plan

The County has adopted various programs designed to preserve agriculture. Agricultural preservation has been integrated into overall land use planning strategy and consequently is a reciprocal beneficiary of many interagency regional land use planning and resource conservation programs. Specific County agricultural preservation programs include the Agriculture Land Use Designation, which establishes an Agriculture designation for lands identified in the Important Farmland Inventory and subjects all parcels to the Agricultural Exclusive (A-E) zone (County 2019b).

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goal 1.6.1-1 and Policies 1.6.2-1 and 1.6.2-6 pertain to agricultural soils.

- **Goals**
  - **1.6.1-1.** Preserve and protect agricultural lands as a nonrenewable resource to assure the continued availability of such lands for the production of food, fiber, and ornamentals.
- **Policies**
  - **1.6.2-1.** Discretionary development located on land designated as Agricultural and identified as Prime Farmland or Farmland of Statewide Importance on the State's Important Farmland Inventory shall be planned and designed to remove as little land as possible from potential agricultural production and to minimize impacts on topsoil.
  - **1.6.2-6.** Discretionary development adjacent to Agricultural-designated lands shall not conflict with agricultural use of those lands.

SOAR Ordinance

The County's Save Open Space and Agricultural Resources (SOAR) Ordinance was initially adopted by the County Board of Supervisors in 1998. The SOAR Ordinance requires a majority vote of the people for development of land currently designated as Open Space, Agricultural, or Rural in the County General Plan and requiring a General Plan amendment. The project site is designated Agricultural in the County General Plan. In 2016, two new sections were added to SOAR to assist the agricultural industry by providing exemptions from a vote of the people for farmworker housing and processing of locally grown food. Further exemptions exist for affordable housing projects.

Additionally, the Ventura County NCZO allows for the development of farmworker housing complexes on parcels smaller than the prescribed minimum lot area on land zoned AE within or adjacent to a city Sphere of Influence, provided the remaining non-farmworker housing complex parcel is a minimum of 10 acres (Ventura County NCZO Section 8103-2.7). The project would include the continuation of agricultural use on a 17.93-acre continued agricultural use parcel on a project site zoned AE that is adjacent to the City of Camarillo (and its Sphere of Influence).

4.2.2 Impact Analysis

4.2.2.1 Significance Thresholds

Per the Initial Study Assessment Guidelines (County 2011), impacts related to agricultural soils would be potentially significant if the proposed project would:

1. Result in the direct and/or indirect loss of soils designated Prime, Statewide Importance, Unique, or Local Importance, beyond the threshold amounts set forth in Table 4.2-2 (from Section 5a.C of the County's Initial Study Assessment Guidelines);
2. Involve a General Plan amendment that will result in the loss of agricultural soils; and/or
3. Be inconsistent with the applicable General Plan Goals and Policies for "Agricultural Resources – Soils" in the County's Initial Study Assessment Guidelines.

Table 4.2-2 Significance Thresholds Based on Impacted Farmland

General Plan Land Use Designation	Farmland Inventory Classification	Significance Threshold (acres)
Agricultural	Prime/Statewide	5
	Unique	10
	Local	15
Open Space/Rural	Prime/Statewide	10
	Unique	15
	Local	20
All Others	Prime/Statewide	20
	Unique	30
	Local	40

Source: County 2011

4.2.2.2 Project Impacts and Mitigation Measures

Threshold 1: Would the project result in the direct and/or indirect loss of soils designated Prime, Statewide Importance, Unique, or Local Importance, beyond the threshold amounts set forth in Table 4.2-2?

IMPACT AG-1 THE PROJECT WOULD RESULT IN THE DIRECT LOSS OF 18.2 ACRES OF PRIME FARMLAND OR FARMLAND OF STATEWIDE IMPORTANCE TO NONAGRICULTURAL USE. NO FEASIBLE MITIGATION IS AVAILABLE TO REDUCE THIS IMPACT TO A LESS THAN SIGNIFICANT LEVEL; THEREFORE, THE IMPACT DUE TO LOSS OF FARMLAND SOILS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

As previously described, the project site is predominantly used for agricultural production. As shown in Table 4.2-3, the proposed project would result in the direct loss of 18.2 acres of Prime Farmland or Farmland of Statewide Importance to nonagricultural use, which exceeds the 5-acre significance threshold for impacts to Prime Farmland or Farmland of Statewide Importance (from Table 4.2-2). The project would include continuation agricultural crop production on a 17.93-acre continued agricultural use parcel on the project site. Nonetheless, because the proposed project would result in a loss of Farmland that exceeds the County's significance thresholds, the permanent and direct loss of Important Farmland soils would result in a significant impact.

Table 4.2-3 Project Impacts to Important Farmland

Important Farmland Inventory Classification	Impact Acreage
Prime Farmland	15.8
Farmland of Statewide Importance	2.4
Total	**18.2**

Mitigation Measures

No mitigation is proposed. There is no feasible mitigation currently available. The remaining agricultural land on the project site would be under different ownership and, therefore, not available for an agricultural conservation easement. In addition, an agricultural conservation easement would not reduce Impact AG-1 to a less than significant level. It is noted that the project

would include continuation agricultural crop production on a 17.93-acre continued agricultural use parcel.

Significance After Mitigation

Impact AG-1 would remain significant and unavoidable.

Threshold 2:	Would the project involve a General Plan amendment that would result in the loss of agricultural soils?

IMPACT AG-2 THE PROJECT WOULD NOT REQUIRE A GENERAL PLAN AMENDMENT. THEREFORE, NO IMPACT WOULD OCCUR.

As discussed throughout Section 4 of this EIR, the project would comply with applicable General Plan goals and policies. The Ventura County NCZO allows for the development of farmworker housing complexes on parcels smaller than the prescribed minimum lot area on land zoned AE within or adjacent to a city Sphere of Influence, provided the remaining non-farmworker housing complex parcel is a minimum of 10 acres (Ventura County NCZO Section 8103-2.7). The project would include the continuation of agricultural use on a 17.93-acre continued agricultural use parcel on a project site zoned AE that is adjacent to the City of Camarillo (and its Sphere of Influence). Therefore, the project would comply with applicable requirements of the Ventura County NCZO and the County General Plan.

In addition, because the project does not require a General Plan amendment and involves the development of affordable farmworker housing, the proposed project would not require inclusion on the ballot for approval by the majority of voters, as set forth in the County's SOAR Ordinance. Accordingly, the County's SOAR ordinance does not apply to the project.

Because the project would not require a General Plan amendment, no impact would occur.

Mitigation Measures

No mitigation is required.

Threshold 3:	Would the project be inconsistent with the applicable General Plan Goals and Policies for "Agricultural Resources – Soils" in the County's Initial Study Assessment Guidelines?

IMPACT AG-3 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would be consistent with the County General Plan goals and policies listed previously under Regulatory Setting. The project's consistency is analyzed in detail in Section 4.10, *Land Use and Planning*. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.2.2.3 Cumulative Impacts

Table 3-1 in Section 3, *Environmental Settings,* identifies currently planned and pending projects in the vicinity of the project site. Project PL15-0014, located at 3100 Somis Road in Camarillo, would involve a General Plan amendment to change the land use designation from Agricultural (40-acre minimum) to Existing Community, and a rezoning of the same area from Agricultural Exclusive (AE 40) to Limited Industrial (M2) for the continued use, operation, and expansion of a wholesale lumber yard. Although this project area is designated as an agricultural area in the General Plan and zoning ordinance, it does not contain any FMMP Important Farmland types. The site is designated by FMMP as Urban and Built-Up Land (DOC 2016).

Project PL18-0109 would involve the construction of a new dog kennel and sales facility on a 20-acre lot in the Agricultural Exclusive zone at 5500 Grimes Canyon in Moorpark. This project area contains both Prime Farmland and Farmland of Statewide Importance, as designated by the FMMP (DOC 2016). Areas of existing farmland would be removed and covered by a proposed dog kennel and sales facility. Consequently, it would also result in a direct loss of soils designated Prime and Farmland of Statewide Importance.

Nonetheless, as stated in the County's Initial Study Assessment Guidelines, any project that would result in the direct and/or indirect loss of agricultural soils would contribute to a significant cumulative impact. However, the cumulative loss of agricultural soils was discussed in the Final EIR for the Comprehensive Amendment to the County General Plan (1988).[4] That EIR concludes that there will be a significant loss of agricultural soils and, although the General Plan contains policies and programs that serve to partially mitigate the cumulative impact, the impact cannot be reduced to a less than significant level. In accordance with Section 15183 of the CEQA Guidelines, although the project would result in a significant impact related to agricultural land conversion, additional cumulative environmental analysis is not required for any project that is consistent with the General Plan, including the proposed project (County 2011).

[4] A Subsequent EIR was certified by the County Board of Supervisors in 2005.

4.3 Biological Resources

This section analyzes the effects of the proposed project on biological resources. The analysis is based on the Initial Study Biological Assessment prepared by Rincon Consultants, Inc. and included in Appendix D.

4.3.1 Setting

4.3.1.1 Biological Survey

The project site and 100-foot buffer (biological survey area) was surveyed by a qualified biologist on May 4, 2020 and August 28, 2020.

Natural Communities and Land Cover Types

Three natural communities and five other land cover types were mapped in the biological survey area (Figure 4.3-1). None of the natural communities or land cover types within the biological survey area are considered to be an environmentally sensitive habitat area (ESHA).

Giant Scouring Rush

This herbaceous alliance typically occurs in riparian areas, including streambanks, floodplains, edges of levees, seeps, ponds, and riparian forest openings between sea level and to 10,000 feet in elevation. The soils where it occurs are alluvial and may be seasonally or intermittently flooded. The herbaceous canopy cover may be intermittent to continuous, and native giant scouring rush (*Equisetum hyemale*) comprises at least 50 percent relative cover in the herbaceous layer. Giant scouring rush is identified by CDFW and the County as a sensitive plant community.

In the biological survey area, giant scouring rush occurs in two small patches in the channelized ephemeral stream (Grove's Place Drain; see "Waters and Wetlands" below) near the northeast corner of the project site (Figure 4.3-1). In these areas, the species forms a closed canopy with no understory. The biological survey area contains less than 0.1 acre of this land cover type, representing less than one percent of the biological survey area.

Bermuda Grass – Italian Wild Rye

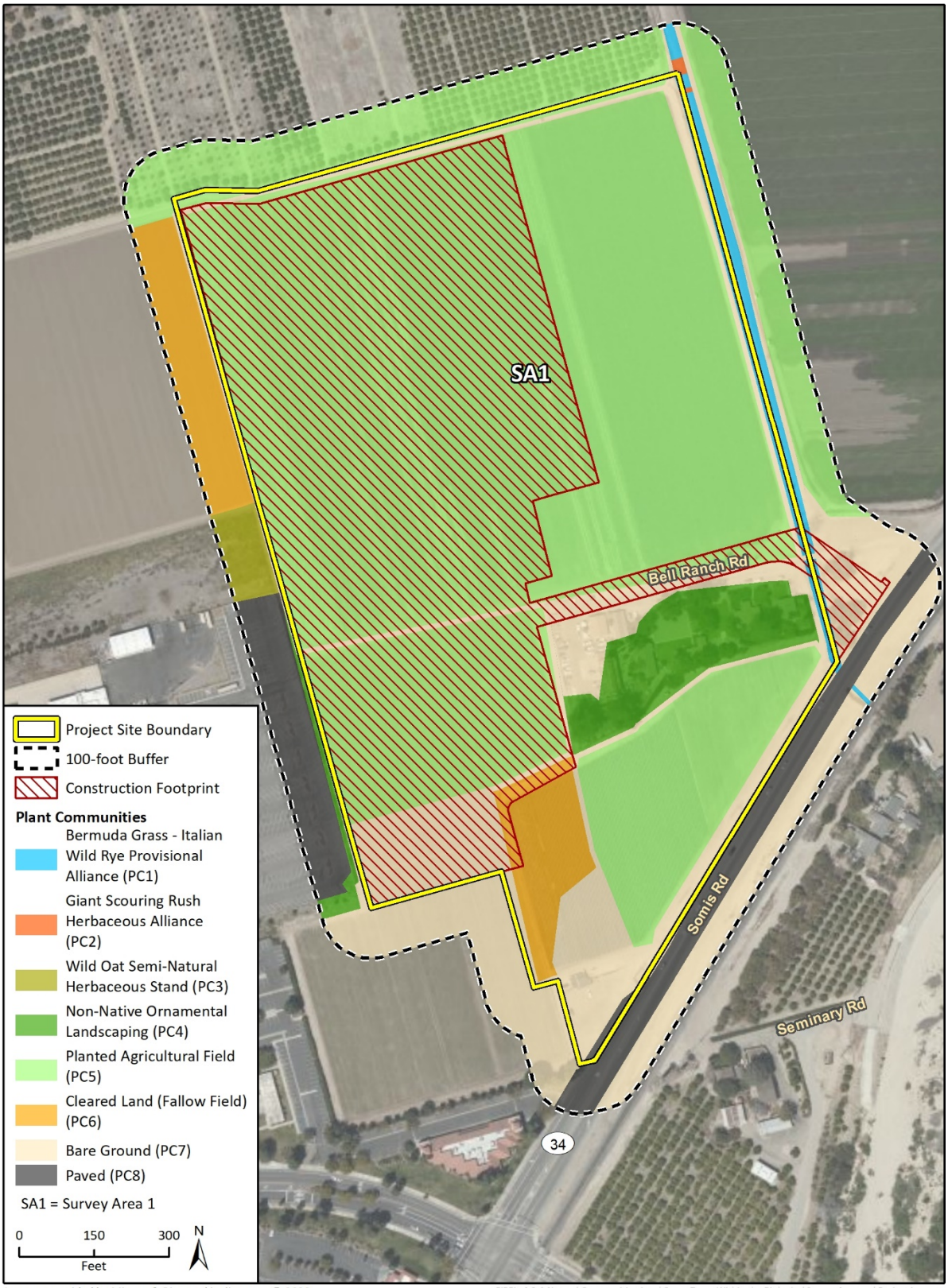
This provisional herbaceous stand occurs in Grove's Place Drain along the east side of the survey area. Non-native Bermuda grass (*Cynodon dactylon*) and Italian wild rye (*Festuca perennis*) are dominant in the herbaceous layer. Other species observed include native smooth willowherb (*Epilobium ciliatum*), rescue grass (*Bromus catharticus*), non-native annual beard grass (*Polypogon monspeliensis*), and castor bean (*Ricinus communis*).

The biological survey area contains approximately 0.8 acre of this land cover type, representing two percent of the biological survey area.

Wild Oat

This herbaceous stand occurs in a variety of settings, including waste places, rangelands, and openings in woodlands between sea level and 7,000 feet in elevation. The herbaceous canopy cover ranges from open to continuous, and non-native wild oat (*Avena fatua*) comprises at least 50 percent relative cover.

Figure 4.3-1 Natural Communities/Land Cover Types Within the Biological Survey Area and Project Impacts



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In the biological survey area, this community occurs near the western boundary of the project site. Wild oat dominates the herbaceous layer. Other non-native herbaceous species are also present, including ripgut brome (*Bromus diandrus*), foxtail barley (*Hordeum murinum*), and bull mallow (*Malva nicaeensis*). The survey area contains approximately 0.4 acre of this land cover type, representing one percent of the biological survey area.

Non-Native Ornamental Landscaping

Non-native ornamental landscaping occurs near the center of the biological survey area in the immediate vicinity of the existing structures and at the southwest corner of the biological survey area bordering the adjacent high school parking lot. Near the existing structures is a tree canopy composed of several large ornamental species, including Peruvian pepper tree (*Schinus molle*), Brazilian pepper tree (*Schinus terebinifolius*), blue gum (*Eucalyptus globulus*), orange tree (*Citrus* sp.), avocado (*Persea americana*), and myoporum (*Myoporum laetum*). The understory is composed primarily of grass lawns, plantain (*Musa* sp.), and garden rose (*Rosa* sp.). At the southwest corner of the biological survey area, the dominant species is kangaroo vine (*Cissus antarctica*), which covers a chain link fence. The understory is composed primarily of non-native ruderal species, including cheeseweed (*Malva parviflora*), prickly lettuce (*Lactuca serriola*), and bristly ox-tongue (*Helminthotheca echioides*). Two native western redbud (*Cercis occidentalis*) and a California sycamore (*Platanus racemose*) are also present in this area.

The biological survey area contains approximately 1.9 acres of non-native ornamental landscaping, representing four percent of the biological survey area.

Planted Agricultural Field

This land cover type is engaged in active agricultural production. The primary crops growing in the survey area at the time of the survey include celery (*Apium graveolens*), cabbage (*Brassica oleracea*), strawberries *(Fragaria ananassa*), and squash (*Cucurbita* sp.).

The biological survey area contains approximately 32.7 acres of this land cover type, representing 65 percent of the biological survey area.

Cleared Land (Fallow Field)

This land cover type is associated with disturbed areas and characterized by dense growth of non-native herbaceous species. It occurs in parts of the survey area that were recently in active agricultural production but were fallow at the time of the survey. Observed species included common sow thistle (*Sonchus oleraceus*), Shepherd's purse (*Capsella bursa pastoris*), and nettle leaf goosefoot (*Chenopodium murale*).

The biological survey area contains approximately 2.3 acre of fallow field, representing five percent of the biological survey area.

Bare Ground

This land cover type in the biological survey area includes the dirt roads, gravel areas, and the active construction zone for the North Pleasant Valley Groundwater Desalter Facility. These areas are kept free of vegetation for human use.

The biological survey area contains approximately 9.22 acre of this land cover type, representing 18 percent of the biological survey area.

Paved

Asphalt-paved land is present in the survey area on SR 34 adjacent to the southern boundary of the project site and in the high school parking lot adjacent to the western boundary. No vegetation is present in these areas.

The biological survey area contains 2.7 acres of paved land, representing five percent of the biological survey area.

Waters and Wetlands

The biological survey area was evaluated for the presence of potential waters and wetlands subject to regulatory agency jurisdiction, including by the United States Army Corps of Engineers (USACE), the California Department of Fish and Wildlife (CDFW), the Regional Water Quality Control Board (RWQCB), and the County under General Plan Policy 1.5.2-4. Two channelized intermittent channels and one ephemeral agricultural drainage ditch were observed in the biological survey area (Figure 4.3-2).

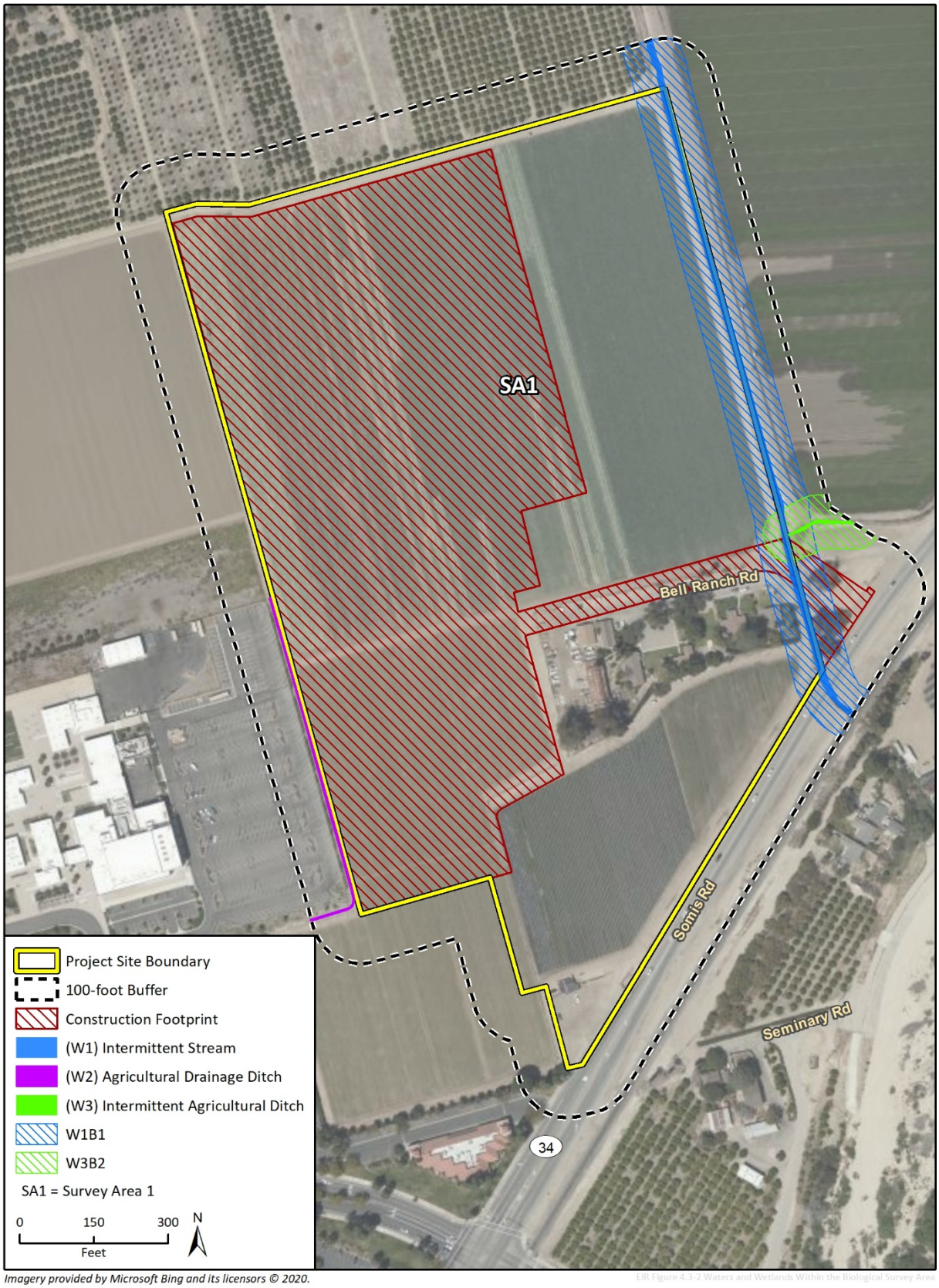
Channelized Intermittent Stream

The channelized intermittent stream (Grove's Place Drain; "W1" on Figure 4.3-2) runs parallel to and immediately outside the eastern boundary of the project site within the biological survey area. The stream is mapped by the National Wetlands Inventory (USFWS 2020) as Riverine habitat. The stream receives flows from the hills to the north and from surrounding agricultural fields, and empties into Arroyo Las Posas, a seasonal stream with associated riparian vegetation, approximately 325 feet southeast of the survey area. It is engineered to follow a straight-line course. The length of the channel adjacent to the project site has a soft bed and banks composed of native soil. A portion of the channel in the survey area on the opposite (south) side of SR 34 is concrete-lined. Ordinary High Water Mark (OHWM) indicators were observed, including changes in vegetation cover and species composition and presence of surface water and soil saturation. The channel is disturbed by regular maintenance of the channel for agricultural activities to allow continued flow. The length of the channel north of SR 34 was primarily dry at the time of the survey, but wet soil and small pools of water were present in some areas. The concrete-lined section contained significant standing water. Review of historical aerial imagery (Google Earth 2020) indicates that the channel lacks relatively permanent flow of water; however, the channel provides surface flow during and immediately after rain events, and receives regular runoff from agriculture. Therefore, the channel may contribute surface flow to nearby Arroyo Las Posas intermittently during a typical year. Vegetation observed in the channel during the survey is described as bermuda grass – Italian wild rye plant community, consisting primarily of non-native, weedy species including Bermuda grass (*Cynodon dactylon*), bentgrass (*Agrostis* sp.), poison hemlock (*Conium maculatum*), Mexican strangletop (*Leptochloa fusca* ssp. *uninervia*), sedge (*Cyperus* sp.), and castor bean (*Ricinus communis*). However, some areas to the north of the biological study area were dominated by giant scouring rush (*Equisetum hyemale* ssp. *affine*), a native species that is designated by USDA (USDA 2020b) as a facultative wetland indicator.

Wetland indicators for hydric soils, hydrophytic vegetation, and hydrology were present in Grove's Place Drain and the RWQCB would likely assert jurisdiction. Due to the connectivity of Grove's Place Drain to the nearby Arroyo Las Posas and the presence of all three wetland indicators, the USACE would likely assert jurisdiction (Figure 4.3-3).

Approximately 281 linear feet/0.13 acre of Grove's Place Drain occurs within the biological survey area.

Figure 4.3-2 Waters and Wetlands Within the Biological Survey Area



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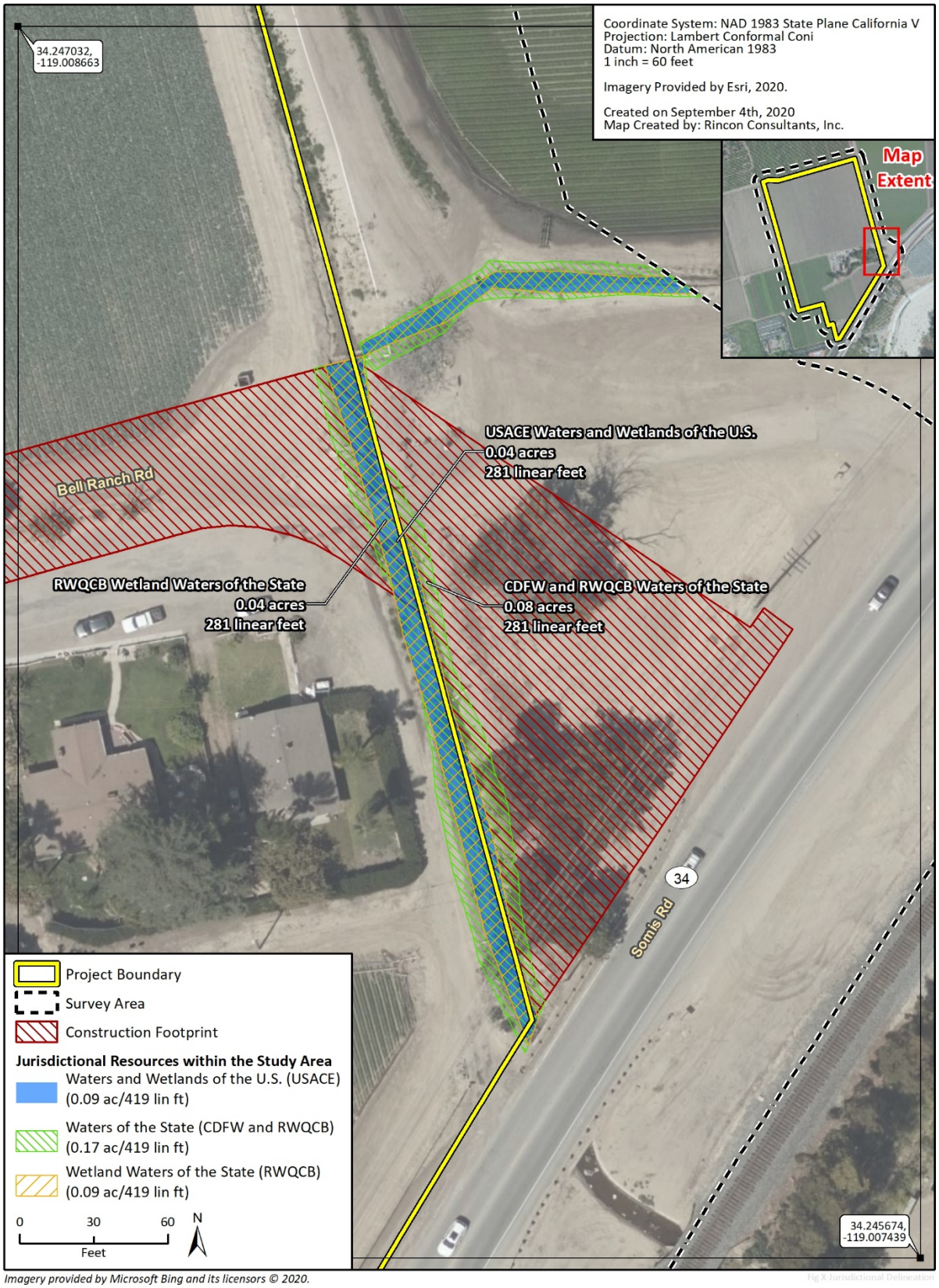
EIR Figure 4.3-2 Waters and Wetlands Within the Biological Survey Area

Figure 4.3-3 Jurisdictional Limits of Waters



Ephemeral Agricultural Drainage Ditch

The W2 (see Figure 4.3-2) feature is a human-made agricultural drainage ditch. It is not mapped by the National Wetlands Inventory or the Ventura County Wetland Inventory. No water was present in the ditch at the time of the survey. No OHWM or other signs of flow or wetland indicator plants were observed. The ditch turns to the west at the southwestern corner of the project site and enters a stormwater drain outside the survey area. The ditch conveys irrigation runoff from upland agricultural areas and has limited function and value. Therefore, this feature is not likely subject to USACE, CDFW, or RWQCB jurisdiction.

Approximately 730 linear feet/0.07 acre of the W2 feature occurs within the biological survey area.

Intermittent Agricultural Ditch

The unnamed intermittent agricultural drainage ditch ("W3" on Figure 4.3-2) provides water intermittently, similar to Grove's Place Drain, and provides a direct connection to Grove's Place Drain. Vegetation and soils observed in this drainage is consistent with Grove's Place Drain.

Wetland indicators for hydric soils, hydrophytic vegetation, and hydrology were present in the unnamed intermittent agricultural drainage ditch and the RWQCB would likely assert jurisdiction. Due to the connectivity of the drainage ditch to the nearby Arroyo Las Posas and the presence of all three wetland indicators, the USACE would likely assert jurisdiction (Figure 4.3-3).

Approximately 138 linear feet/0.04 acre of the unnamed intermittent agricultural drainage ditch occurs within the biological survey area.

Species

Observed Species

A total of 61 plant species were identified in the biological survey area, of which eight are native and 53 are non-native. A total of nine wildlife species were observed, all of which are native. See Appendix D for a list of all plant and wildlife species observed in the biological survey area during the survey.

Protected Trees

The Ventura County Non-Coastal Zone Ordinance (NCZO) Section 8107-25 (Tree Protection Ordinance) defines protected trees as (1) all oaks and sycamores with a circumference of 9.5 inches or larger (measured at least 4.5 feet above ground); (2) trees with a historical designation; and (3) trees with a circumference of 90 inches or larger. One protected western sycamore (*Platanus racemosa*) was observed in the biological survey buffer outside the western boundary of the project site. No oaks, sycamores, or any other native tree species were observed in the project site. Several of the non-native blue gums, Peruvian pepper trees, and Brazilian pepper trees observed near the existing residential structures on the project site have a girth of greater than 90 inches and, therefore, are considered heritage trees under the Tree Protection Ordinance.

Special-Status Species and Nests

Observed Species

No special-status species were observed in the biological survey area during the field survey.

Species with Potential to Occur Within the Biological Survey Area

Review of existing literature and a 10-mile radius California Natural Diversity Database (CNDDB) search identified 21 special-status plant species and 36 special-status wildlife species, including state- and federally-listed endangered or threatened species (see Appendix Two of the Initial Study Biological Assessment [EIR Appendix D]). Of these, species that were documented within five miles of the biological survey area or determined to have a moderate to high potential to occur are listed in Table 7 of the Initial Study Biological Assessment (Appendix D), including 9 special-status plant species and 10 special-status wildlife species.

PLANT SPECIES

No special-status plant species are expected to occur in the biological survey area because the entire survey area is disturbed, developed, or engaged in active agricultural use.

WILDLIFE SPECIES

Five special-status wildlife species have low potential to occur in the biological survey area: California legless lizard (*Anniella* spp.), western pond turtle (*Emys marmorata*), coast horned lizard (*Phrynosoma blainvillii*), two-striped gartersnake (*Thamnophis hammondii*), and burrowing owl (*Athene cunicularia*). No special-status wildlife species have moderate or high potential to occur in the biological survey area due to the disturbance of the survey area and lack of suitable habitat.

Nesting Birds

The field survey was conducted during the nesting season, but no nests or birds exhibiting nesting behaviors were observed in the biological survey area. The ornamental trees and shrubs associated with the cluster of existing residential and agricultural structures in the center of the survey area and the structures themselves are suitable nesting habitat for a number of bird species common in the project area. The planted fields, fallow fields, and bare ground that occupy most of the remainder of the biological survey area are marginally suitable nesting habitat for some ground-nesting bird species. Although the value of nesting habitats in the biological survey area is limited by the lack of native vegetation and the high level of disturbance due to agricultural operations, there is a potential for nesting birds protected by the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game (CFG) Code 3503 to occur in the biological survey area.

Wildlife Movement and Connectivity Features

The project site is not located in a mapped wildlife corridor. The biological survey area is not located in the Santa Monica – Sierra Madre Habitat Connectivity Corridor (Spencer et al. 2010) or in an area zoned by the County as a Habitat Connectivity Wildlife Corridor. Because the biological survey area is currently used for agriculture, it generally is not attractive to wildlife.

The nearest natural habitat is in Arroyo Las Posas, a seasonal stream with associated riparian vegetation, approximately 325 feet to the southeast on the opposite side of SR 34 and a railroad track. The channelized intermittent stream on the eastern edge of the survey area (Grove's Place Drain) connects to Arroyo Las Posas and passes beneath the highway and railroad. Grove's Place Drain ("W1" on Figure 4.3-2) may serve as a minor corridor facilitating wildlife movement between Arroyo Las Posas and open space in the Santa Susana Mountains to the north of the survey area.

4.3.1.2 Regulatory Setting

Federal Regulations

Federal Endangered Species Act

The United States Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) share responsibility for implementing the Federal Endangered Species Act (FESA) (16 USC § 153 et seq.). Generally, the USFWS implements the FESA for terrestrial and freshwater species, while the NMFS implements the FESA for marine and anadramous species. Projects that would result in "take" of any federally threatened or endangered species are required to obtain permits from the USFWS or NMFS through either Section 7 (interagency consultation with a federal nexus) or Section 10 (Habitat Conservation Plan) of the FESA, depending on the involvement by the federal government in permitting and/or funding of the project. The permitting process is used to determine if a project would jeopardize the continued existence of a listed species and what measures would be required to avoid jeopardizing the species. "Take" under federal definition means to harass, harm (which includes habitat modification), pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Proposed or candidate species do not have the full protection of the FESA; however, the USFWS and NMFS advise project applicants that they could be elevated to listed status at any time.

Clean Water Act

Under Section 404 of the Clean Water Act, the USACE has authority to regulate activities that could discharge fill of material into wetlands or other "waters of the United States." Perennial and intermittent creeks are considered waters of the United States if they are hydrologically connected to other jurisdictional waters (typically a navigable water). The USACE also implements the federal policy embodied in Executive Order 11990, which is intended to result in no net loss of wetland value or acres. In achieving the goals of the Clean Water Act, the USACE seeks to avoid adverse impacts and offset unavoidable adverse impacts on existing aquatic resources. Any fill of wetlands that are hydrologically connected to jurisdictional waters would require a permit from the USACE prior to the start of work. Typically, when a project involves impacts to waters of the United States, the goal of no net loss of wetland acres or values is met through avoidance and minimization to the extent practicable, followed by compensatory mitigation involving creation or enhancement of similar habitats.

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) of 1918 was originally enacted between the United States and Great Britain (acting on behalf of Canada) for the protection of migratory birds between the two countries. The MBTA has since been expanded to include Mexico, Japan, and Russia. Under MBTA provisions, it is unlawful "by any means or manner to pursue, hunt, take, capture (or) kill" any migratory birds as defined by the MBTA except as permitted by regulations issued by the USFWS. The term "take" is defined by the USFWS regulation to mean to "pursue, hunt, shoot, wound, kill, trap, capture or collect" any migratory bird or any part, nest, or egg of any migratory bird covered by the conventions, or to attempt those activities.

State Regulations

California Endangered Species Act

The California Department of Fish and Wildlife (CDFW) derives its authority from the Fish and Game Code of California. The California Endangered Species Act (CESA) (Fish and Game Code Section 2050 et. seq.) prohibits take of state listed threatened or endangered. Take under CESA is restricted to direct mortality of a listed species and the law does not prohibit indirect harm by way of habitat modification. Where incidental take would occur during construction or other lawful activities, CESA allows the CDFW to issue an Incidental Take Permit upon finding, among other requirements, that impacts to the species have been minimized and fully mitigated.

California Fish and Game Code

The CDFW also enforces Sections 3511, 4700, 5050, and 5515 of the Fish and Game Code, which prohibits take of species designated as Fully Protected. The CDFW is not allowed to issue an Incidental Take Permit for Fully Protected species; therefore, impacts to these species must be avoided.

California Fish and Game Code sections 3503, 3503.5, and 3513 describe unlawful take, possession, or destruction of native birds, nests, and eggs. Section 3503.5 of the Code protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs. Section 3513 makes it a state-level office to take any bird in violation of the federal MBTA. CDFW administers these requirements.

Species of Special Concern (SSC) is a category used by the CDFW for those species which are considered to be indicators of regional habitat changes or are considered to be potential future protected species. Species of Special Concern do not have any special legal status except that which may be afforded by the Fish and Game Code as noted above. The CDFW uses the SSC category as a management tool to include these species in special consideration when decisions are made concerning the development of natural lands. The CDFW also has authority to administer the Native Plant Protection Act (NPPA) (Fish and Game Code Section 1900 et seq.). The NPPA requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare. Effective in 2015, CDFW promulgated regulations (14 CCR 786.9) under the authority of the NPPA, establishing that the CESA's permitting procedures would be applied to plants listed under the NPPA as "Rare." With this change, there is little practical difference for the regulated public between plants listed under CESA and those listed under the NPPA.

Perennial, intermittent, and ephemeral streams and associated riparian vegetation, when present, also fall under the jurisdiction of the CDFW. Section 1600 *et seq*. of the Fish and Game Code (Lake and Streambed Alteration Agreements) gives the CDFW regulatory authority over activities that divert, obstruct, or alter the channel, bed, or bank of any river, stream or lake.

Porter-Cologne Water Quality Control Act

The State Water Resources Control Board (SWRCB) and the local Regional Water Quality Control Board (RWQCB) have jurisdiction over "waters of the State," pursuant to the Porter-Cologne Water Quality Control Act, which are defined as any surface water or groundwater, including saline waters, within the boundaries of the State. The SWRCB has issued general Waste Discharge Requirements (WDRs) regarding discharges to "isolated" waters of the State (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters

Deemed by the U.S. Army Corps of Engineers to be Outside of Federal Jurisdiction). The RWQCB administers actions under this general order for isolated waters not subject to federal jurisdiction, and is also responsible for the issuance of water quality certifications pursuant to Section 401 of the Clean Water Act for waters subject to federal jurisdiction.

Local Regulations

County of Ventura General Plan

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goal 1.5.1 and Policies 1.5.2-1 through 1.5.2-6 pertain to biological resources.

- **Goals**
  - **1.5.1.** Identify, preserve, and protect significant biological resources in Ventura County from incompatible land uses and development. Significant biological resources include endangered, threatened or rare species and their habitats, wetland habitats, coastal habitats, wildlife migration corridors that facilitate habitat connectivity and wildlife movement, and locally important species/communities.
- **Policies**
  - **1.5.2-1.** Discretionary development which could potentially impact biological resources shall be evaluated by a qualified biologist to assess impacts and, if necessary, develop mitigation measures.
  - **1.5.2-2.** Discretionary development shall be sited and designed to incorporate all feasible measures to mitigate any significant impacts to biological resources. If the impacts cannot be reduced to a less than significant level, findings of overriding considerations must be made by the decision-making body.
  - **1.5.2-3.** Discretionary development that is proposed to be located within 300 feet of a marsh, small wash, intermittent lake, intermittent stream, spring, or perennial stream (as identified on the latest USGS 7.5-minute quad map), shall be evaluated by a County approved biologist for potential impacts on wetland habitats. Discretionary development that would have a significant impact on significant wetland habitats shall be prohibited, unless mitigation measures are adopted that would reduce the impact to a less than significant level; or for lands designated "Urban" or "Existing Community," a statement of overriding considerations is adopted by the decision-making body.
  - **1.5.2-4.** Discretionary development shall be sited a minimum of 100 feet from significant wetland habitats to mitigate the potential impacts on said habitats. Buffer areas may be increased or decreased upon evaluation and recommendation by a qualified biologist and approval by the decision-making body. Factors to be used in determining adjustment of the 100-foot buffer include soil type, slope stability, drainage patterns, presence or absence of endangered, threatened or rare plants or animals, and compatibility of the proposed development with the wildlife use of the wetland habitat area. The requirement of a buffer (setback) shall not preclude the use of replacement as a mitigation when there is no other feasible alternative to allowing a permitted use, and if the replacement results in no net loss of wetland habitat. Such replacement shall be "in kind" (i.e. same type and acreage), and provide wetland habitat of comparable biological value. On-site replacement shall be preferred wherever possible. The replacement plan shall be developed in consultation with California Department of Fish and Game.

- **1.5.2-5.** The California Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, National Audubon Society, and the California Native Plant Society shall be consulted when discretionary development may affect significant biological resources. The National Park Service shall also be consulted regarding discretionary development within the Santa Monica Mountains or Oak Park Area.
- **1.5.2-6.** Based on the review and recommendation of a qualified biologist, the design and maintenance of road and floodplain improvements, including culverts and bridges shall incorporate all feasible measures to accommodate wildlife passage.

4.3.2 Impact Analysis

4.3.2.1 Significance Thresholds

Per the Initial Study Assessment Guidelines (County 2011), impacts related to biological resources would be potentially significant if the proposed project would:

1. Directly or indirectly, impact one or more plant species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity;
2. Directly or indirectly, impact one or more animal species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity;
3. Temporarily or permanently remove sensitive plant communities through construction, grading, clearing, or other activities;
4. Result in indirect impacts from project operation at levels that will degrade the health of a sensitive plant community;
5. Cause any of the following activities within waters or wetlands: removal of vegetation; grading; obstruction or diversion of water flow; change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; or any disturbance of the substratum;
6. Result in disruptions to wetland or riparian plant communities that will isolate or substantially interrupt contiguous habitats, block seed dispersal routes, or increase vulnerability of wetland species to exotic weed invasion or local extirpation;
7. Interfere with ongoing maintenance of hydrological conditions in a water or wetland;
8. Provide an adequate buffer for protecting the functions and values of existing waters or wetlands;
9. Remove habitat within a wildlife movement corridor;
10. Isolate habitat;
11. 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;
12. Intimidate fish or wildlife via the introduction of noise, light, development or increased human presence; and/or
13. Be inconsistent with the applicable General Plan Goals and Policies for "Biological Resources" in the Initial Study Assessment Guidelines.

4.3.2.2 Project Impacts and Mitigation Measures

Threshold 1:	Would the project, directly or indirectly, impact one or more plant species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity?
Threshold 2:	Would the project, directly or indirectly, impact one or more animal species by reducing the species' population, reducing the species' habitat, fragmenting its habitat, or restricting its reproductive capacity?

IMPACT BIO-1 THE PROJECT WOULD RESULT IN NO DIRECT OR INDIRECT IMPACTS TO SPECIAL-STATUS PLANT OR WILDLIFE SPECIES DUE TO THE DISTURBED NATURE OF THE PROJECT SITE. NO PROTECTED TREES OCCUR WITHIN THE PROJECT CONSTRUCTION FOOTPRINT; THEREFORE, NO PROTECTED TREES WOULD BE IMPACTED. REGULATORY COMPLIANCE WOULD PROTECT NESTING BIRD SPECIES DURING PROJECT CONSTRUCTION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The biological survey area is entirely within a site that is currently in active agricultural production. The project would not result in any loss of special-status species' habitat. No state- or federally-listed endangered, threatened, or special-status wildlife or plant species were observed in the biological survey area during the field survey.

Special-Status Plant Species

As discussed in the Setting, no special-status plant species are expected to occur in the biological survey area because the entire survey area is disturbed, developed, or engaged in active agricultural use. Therefore, the project would result in no impact to special-status plant species.

Special-Status Wildlife Species

As discussed in the Setting, no special-status wildlife species have moderate or high potential to occur in the biological survey area due to the disturbance of the survey area and lack of suitable habitat. However, five special-status wildlife species have low potential to occur in the biological survey area, including California legless lizard, western pond turtle, coast horned lizard, two-striped gartersnake, and burrowing owl.

California legless lizard, western pond turtle, and two-striped garter snake have low potential to occur in Grove's Place Drain on the eastern side of the survey area but are not expected to occur in the project construction footprint, which is located approximately 300 feet from that habitat (Figure 4.3-2). Coast horned lizard has low potential to occur in Grove's Place Drain or in a small area of grassland habitat mapped on the western side of the survey area (Figure 4.3-1 and Figure 4.3-2). However, coast horned lizard is not expected to occur in the project construction footprint due to existing agricultural use and disturbance on and near the project site. Additionally, transient overwintering individuals of burrowing owl have low potential to occur throughout most of the biological survey area, including the project construction footprint. However, no nesting burrowing owls are currently expected to occur in the biological survey area because the survey area is outside the current nesting range of the species. Therefore, the project would result in less than significant impacts to special-status wildlife species.

Indirect Effects

Special-status species documented in the vicinity of the project site could occur in Arroyo Las Posas to the southeast of the project site, but indirect effects related to noise, lighting, human presence, or dust during project construction and operation are not anticipated due to the distance of project footprint from Arroyo Las Posas. Indirect impacts to fish and other aquatic species in Arroyo Las Posas as a result of sedimentation runoff would be avoided through adherence to the County's Stormwater Quality Management Ordinance No. 4142. Therefore, the project would result in less than significant indirect impacts to special-status species.

Protected Trees

As stated in the Setting, eight trees protected by the County's Tree Protection Ordinance are present in the biological survey area. These trees are located outside the project construction footprint (Figure 4.3-3). Additionally, no construction activities would occur within the driplines of the trees and no tree removal or trimming would occur as part of the project. Therefore, the project would result in no impact to protected trees.

Nesting Birds

Although birds protected by the CFG Code and MBTA may nest in the biological survey area or adjacent properties, no special-status bird species are expected to nest in the biological survey area due to the absence of suitable nesting habitat for avian species. Depending on the distance from construction activities, nesting bird species could be impacted by project construction noise. However, the project would comply with the MBTA and CFG Codes 3503, 3503.3, 3511, and 3513, which protect nesting birds.

In compliance with these regulations, the project applicant would be required to conduct pre-construction surveys for nesting birds. The following measures would be incorporated into the project as Conditions of Approval:

- The project applicant/contractor would conduct all demolition, construction, ground disturbance, and vegetation clearing activities (collectively referred to as "construction activities") in such a way as to avoid protected nesting birds. To that end, no construction activities would occur during the avian breeding and nesting season (February 1 – August 31).
- If, however, construction activities must occur during the nesting season, a pre-construction survey shall be conducted by a qualified biologist for active bird nests (those containing eggs or nestlings, or with juvenile birds still dependent on the nest). The survey shall be conducted by a qualified biologist no more than seven days prior to the initiation of construction activities. The nesting bird survey shall cover the construction footprint plus a buffer of 100 feet, as feasible.
- Any active nests that are present during the pre-construction survey shall be avoided until determined by the biologist to no longer be active. The biologist shall determine appropriate avoidance buffers for each nest based on species, nest location, and types of disturbance proposed in the vicinity of the nest.
- If construction activities are delayed after the survey has been conducted, the qualified biologist shall conduct an additional nesting bird survey such that no more than seven days have elapsed between the last survey and the commencement of construction activities.

With regulatory compliance, impacts to nesting birds would be less than significant.

Mitigation Measure

No mitigation is required.

Threshold 3:	Would the project temporarily or permanently remove sensitive plant communities through construction, grading, clearing, or other activities?
Threshold 4:	Would the project result in indirect impacts from project operation at levels that will degrade the health of a sensitive plant community?

IMPACT BIO-2 THE PROJECT WOULD NOT IMPACT ANY SENSITIVE PLANT COMMUNITIES. POTENTIAL INDIRECT IMPACTS TO SENSITIVE PLANT COMMUNITIES FROM DUST DURING PROJECT CONSTRUCTION WOULD BE LESS THAN SIGNIFICANT.

Plant communities are considered special-status outside the coastal zone if designated sensitive by CDFW (CDFW 2020) or if they are considered Locally Important by the lead agency. One sensitive plant community (giant scouring rush) is present in the biological survey area. It occurs in two small patches in Grove's Place Drain near the northeast corner of the project site (Figure 4.3-1 and Figure 4.3-2). Giant scouring rush is located approximately 300 feet outside the project construction footprint; therefore, no direct impacts to sensitive plant communities would occur as a result of project implementation (Table 4.3-1).

Indirect impacts to the giant scouring rush community would be less than significant because no construction activities would occur within 300 feet of that plant community and run-off from the project site does not enter Grove's Place Drain. Potential indirect impacts from dust during construction would be minimized with adherence to dust control measures in the Ventura County NCZO. In addition, the project landscape plan does not include plant species identified as invasive by the California Invasive Plant Council (Cal-IPC; 2020). Therefore, potential indirect impacts to sensitive plant communities would be less than significant.

Table 4.3-1 Project Impacts to Natural Communities and Land Cover Types

Natural Community/Land Cover Type	Existing Within the Biological Survey Area (acres)	Project Impacts (acres)
Giant Scouring Rush	0.02	0
Bermuda Grass – Italian Wild Rye	0.83	0.07
Wild Oat	0.39	0
Non-Native Ornamental Landscaping	1.95	0
Planted Agricultural Field	32.68	16.91
Cleared Land (Fallow Field)	2.34	0.18
Bare Ground	9.22	1.89
Paved	2.73	0
Total	**50.16**	**19.05**

Mitigation Measures

No mitigation is required.

Threshold 5:	Would the project cause any of the following activities within waters or wetlands: removal of vegetation; grading; obstruction or diversion of water flow; change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; or any disturbance of the substratum?
Threshold 6:	Would the project result in disruptions to wetland or riparian plant communities that will isolate or substantially interrupt contiguous habitats, block seed dispersal routes, or increase vulnerability of wetland species to exotic weed invasion or local extirpation?
Threshold 7:	Would the project interfere with ongoing maintenance of hydrological conditions in a water or wetland?
Threshold 8:	Would the project provide an adequate buffer for protecting the functions and values of existing waters or wetlands?

IMPACT BIO-3 IMPACTS TO POTENTIALLY JURISDICTIONAL WATERS/WETLANDS WITHIN THE BIOLOGICAL STUDY AREA WOULD BE SIGNIFICANT BUT MITIGATABLE.

Construction of the proposed eastern driveway would temporarily impact approximately 0.08 acre (281 linear feet) of streambed within RWQCB and CDFW jurisdiction, approximately 0.04 acre (281 linear feet) of wetland waters of the state within RWQCB jurisdiction, and approximately 0.04 acre (281 linear feet) of wetland and waters of the U.S. within USACE jurisdiction (Figure 4.3-3). Therefore, impacts to waters and wetlands would result from project implementation, which constitutes a potentially significant impact.

Indirect impacts to Grove's Place Drain to the east of the project site would be less than significant because proposed construction activities would occur more than 300 feet from the stream (Figure 4.3-2). This buffer would be adequate to attenuate indirect effects such as noise, dust, and human presence during construction, and the ecological function of the feature would not be affected. Additionally, the stream would not receive runoff from the project site because the land in the project site slopes down to the west and project construction would be required to adhere to the County's Stormwater Quality Management Ordinance No. 4142.

As discussed in the Setting, Arroyo Las Posas, a seasonal stream with associated riparian vegetation, occurs approximately 425 feet south of the project site. The project would not directly impact Arroyo Las Posas. Grove's Place Drain enters Arroyo Las Posas but does not receive flows from the project site. Therefore, sediment from the project site would not impact the riparian plant communities in Arroyo Las Posas. Arroyo Las Posas is located more than 500 feet from any proposed construction activity and is separated from the project site by SR 34 and a railroad track. This buffer would be adequate to attenuate indirect effects such as noise, dust, and human presence during construction, and the ecological function of Arroyo Las Posas would not be affected. As stated above, the project landscape plan does not include plant species identified as invasive by the Cal-IPC (Cal-IPC 2020). The project site is not adjacent to natural areas, and development of the project would not interrupt habitat contiguity or block seed dispersal routes. Therefore, no impacts to Arroyo Las Posas and its riparian plant communities and sensitive species would occur.

Construction and operation of the project would not alter the hydrology of the project site in a manner that would impact the flows of nearby waterways. Post-construction runoff from the project site would be treated in proposed on-site stormwater detention basins. Similar to existing

conditions, outflow from the proposed on-site basins would be released into the City of Camarillo storm drain system. No impact related to ongoing maintenance of hydrological conditions in waters/wetlands would occur.

Mitigation Measures

BIO-3 Jurisdictional Waters Mitigation Plan

The project applicant shall restore herbaceous wetland communities temporarily impacted by project activities, including Giant Scouring Rush and Bermuda Grass – Italian Wild Rye plant communities, at a minimum 1:1 mitigation to impact ratio (estimated at 0.09 acre total based on current design). The project applicant shall contract with a County-approved qualified biologist to prepare a Mitigation Plan that must include restoring these impacted communities occurring in the wetland features within the construction footprint. Planting palettes shall approximate existing species composition, except that non-native species such as Bermuda grass shall not be planted. The Mitigation Plan shall include, but not be limited to, the following components:

- A description of the purpose and goals of the mitigation plan, including the improvement of specific physical, chemical, and/or biological functions at the mitigation site.
- A description of the plant community type(s) and amount(s) that shall be provided by the mitigation and how the mitigation method shall achieve the mitigation project goals.
- A plant palette and methods of salvaging, propagating, and planting the site to be restored.
- Methods of soil preparation.
- Method and timing of irrigation.
- Best Management Practices (BMPs) that shall be utilized to avoid erosion and excessive runoff before plant establishment.
- Maintenance and monitoring necessary to ensure that the restored plant communities meet the success criteria.
- Schedule for restoration activities, including weed abatement, propagating and planting, soil preparation, irrigation, erosion control, qualitative and quantitative monitoring, and reporting to the County.
- Identification of measurable performance standards for each objective to evaluate the success of the compensatory mitigation.
- Identification of contingency and adaptive management measures to address unforeseen changes in site conditions or other components of the mitigation project.

The Jurisdictional Waters Mitigation Plan shall provide for monitoring to be conducted for five years or until the performance criteria are met, whichever occurs sooner. The success criteria are as follows:

- The mitigation site shall attain a native percent cover that reflects that of the target communities occurring in unimpacted reference sites;
- Non-native species shall comprise less than five percent cover and zero percent cover of species listed as “High” on the California Invasive Plant Council’s Invasive Plant Inventory Database (or its successor); and
- Irrigation of the native plantings shall cease no later than the end of the third year of restoration monitoring.

In addition, applicable permits shall be obtained from the appropriate federal, state and local agencies for work within Grove's Place Drain (W1) prior to project initiation. Conditions in these permits may augment or supersede Mitigation Measure BIO-3, if more stringent.

Significance After Mitigation

Impact BIO-3 would be less than significant with implementation of Mitigation Measure BIO-3.

Threshold 9:	Would the project remove habitat within a wildlife movement corridor?
Threshold 10:	Would the project isolate habitat?
Threshold 11:	Would the project 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?
Threshold 12:	Would the project intimidate fish or wildlife via the introduction of noise, light, development or increased human presence?

IMPACT BIO-4 NO DIRECT IMPACT TO LOCAL OR REGIONAL WILDLIFE MOVEMENT OR HABITAT CONNECTIVITY WOULD OCCUR. INDIRECT IMPACTS ASSOCIATED WITH INTIMIDATION OF WILDLIFE WOULD BE LESS THAN SIGNIFICANT.

As previously discussed, the project site is not located in a mapped wildlife corridor. Little wildlife movement is expected to occur in the project site due to the lack of native habitats and high level of disturbance. Grove's Place Drain is identified as a potential corridor for wildlife movement along the eastern edge of the survey area. However, Grove's Place Drain is located entirely outside the construction footprint (more than 300 feet from any proposed construction activity). The proposed project would not remove or alter any native habitats or impede wildlife movement at a level substantially greater than the existing conditions. Therefore, the project would not isolate habitat or interfere with wildlife movement patterns and no impact would occur.

During construction and operation of the project, the project site would have increased activity, human presence, and noise that could affect wildlife. Wildlife use of the project site is expected to be low under existing conditions, as the project site and vicinity are used for agriculture. Additionally, any animals occurring in the area are likely accustomed to the higher levels of noise and other disturbance from agricultural operations. The nearest natural habitat (in Arroyo Las Posas) is approximately 325 feet to the southeast of the biological survey area, across a busy roadway (SR 34) and a railroad track. Grove's Place Drain is located more than 300 feet from proposed construction activity. Due to the distance and high level of existing disturbance, the project would not substantially elevate noise, light, or human presence in the project area. Therefore, indirect impacts associated with intimidation of wildlife would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 13:	Would the project be inconsistent with the applicable General Plan Goals and Policies for "Biological Resources" in the Initial Study Assessment Guidelines?

IMPACT BIO-5 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would be consistent with the County General Plan goals and policies listed previously under Regulatory Setting. The project's consistency is analyzed in detail in Section 4.10, *Land Use and Planning*. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.3.2.3 Cumulative Impacts

The project area is highly disturbed by agricultural crop production and urbanized development (e.g., residential, commercial, and institutional uses). The cumulative projects included in Table 3-1 would result in minimal impacts to biological resources due to required implementation of regulatory requirements and mitigation measures related to sensitive biological resources. As discussed above, the proposed project would result in less than significant impacts to biological resources, with the exception of potential jurisdictional waters under Impact BIO-3. Mitigation for waters of the U.S./waters of the state would be similar to the minimum required for other cumulative projects that may result in impacts to such features. Therefore, the project would not result in a cumulatively considerable contribution to a cumulative biological resources impact.

4.4 Cultural Resources – Historic

This section evaluates potential impacts to cultural resources associated with the proposed project. This section is based in part on the Cultural Resources Assessment prepared by Rincon Consultants, Inc. (Rincon) and included in Appendix E.

4.4.1 Setting

4.4.1.1 Prehistoric Context

The prehistoric chronology for southern California is generally divided into the following periods: the Early Man Horizon (ca. 10,000-6,000 BCE), the Milling Stone Horizon (6,000-3,000 BCE), the Intermediate Horizon (3,000 BCE-CE 500), and the Late Prehistoric Horizon (CE 500-Historic Contact; Wallace 1955, 1978). The project site lies in the Santa Barbara Subregion of the Southern Coast (Archaeological) Region, one of eighteen organizational subdivisions of the state (Moratto 1984:Fig. 1).

Early Man Horizon (ca. 10,000-6,000 BCE)

Early Man Horizon sites are generally associated with a greater emphasis on hunting than later horizons. Recent data indicate that the Early Man economy was a diverse mixture of hunting and gathering, including a significant focus on aquatic resources in coastal areas (e.g., Jones et al. 2002) and on inland Pleistocene lakeshores (Moratto 1984). A warm and dry 3,000-year period called the Altithermal began around 6,000 BCE. The conditions of the Altithermal are likely responsible for the change in human subsistence patterns at this time, including a greater emphasis on plant foods and small game.

Milling Stone Horizon (6,000-3,000 BCE)

Wallace (1955:219) defined the Milling Stone Horizon as "marked by extensive use of milling stones and mullers, a general lack of well-made projectile points, and burials with rock cairns." The dominance of these artifact types indicate a subsistence strategy oriented around collecting plant foods and small animals. Lithic artifacts associated with Milling Stone Horizon sites are dominated by locally available tool stone. In addition to ground stone tools such as manos and metates, chopping, scraping, and cutting tools were very common during this period (Kowta 1969). The mortar and pestle, associated with acorns or other foods processed through pounding, were first used during the Milling Stone Horizon and increased dramatically in later periods (Wallace 1955, 1978; Warren 1968).

Intermediate Horizon (3,000 BCE-CE 500)

The Intermediate Horizon is characterized by a shift toward a hunting and maritime subsistence strategy, as well as greater use of plant foods. During the Intermediate Horizon, a noticeable trend occurred toward greater adaptation to local resources including a broad variety of fish, land mammal, and sea mammal remains along the coast. Tool kits for hunting, fishing, and processing food and materials reflect this increased diversity, with flake scrapers, drills, various projectile points, and shell fishhooks being manufactured. Mortars and pestles became more common during this transitional period, gradually replacing manos and metates as the dominant milling equipment

(e.g., Glassow et al. 1988; True 1993). Mortuary practices during the Intermediate Horizon typically included fully flexed burials oriented toward the north or west (Warren 1968:2-3).

Late Prehistoric Horizon (CE 500-Historic Contact)

During the Late Prehistoric Horizon, the diversity of plant food resources and land and sea mammal hunting increased even further than during the Intermediate Horizon. More classes of artifacts were observed during this period and high quality exotic lithic materials were used for small finely worked projectile points associated with the bow and arrow. Steatite containers were made for cooking and storage and an increased use of asphalt for waterproofing is noted. More artistic artifacts were recovered from Late Prehistoric sites and cremation became a common mortuary custom. Larger, more permanent villages supported an increased population size and social structure (Wallace 1955:223).

The period between 500 CE and European contact is divided into three regional patterns: the Chumash Tradition present mainly in the region of Santa Barbara and Ventura counties; the Takic or Numic Tradition present mainly in the Los Angeles and Orange Counties region; and the Yuman Tradition present mainly in the San Diego region (Warren 1968). After 500 CE, a wealth of ornaments, ceremonial, and artistic items characterize the Chumash Tradition (Warren 1968) along the central coast and offshore islands. Characteristic mortuary practices during the Chumash Tradition included burial in crowded cemeteries. Burials are normally flexed, placed face down, and oriented toward the north or west (Warren 1968:5).

4.4.1.2 Ethnographic Context

The project site lies in an area historically occupied by the Ventureño Chumash, so called after their historic period association with Mission San Buenaventura (Grant 1978a). The Chumash spoke six closely related Chumashan languages, which have been divided into three branches: Northern Chumash (consisting only of Obispeño); Central Chumash (consisting of Purisimeño, Ineseño, Barbareño, and Ventureño); and Island Chumash (Jones and Klar 2007:80). Groups neighboring Chumash territory included the Salinan to the north, the Southern Valley Yokuts and Tataviam to the east, and the Gabrielino-Tongva to the south.

Early Spanish accounts describe the Santa Barbara Channel as heavily populated at the time of contact. Estimates of the total Chumash population range from 8,000-10,000 (Kroeber 1925:551) to 18,000-22,000 (Cook and Heizer 1965: 21). The village of *šukuw* (or *shuku*), at Rincon Point, was encountered by Gaspar de Portola in 1769. This village had 60 houses and seven canoes, with an estimated population of 300 (Grant 1978b).

The *tomol*, or wooden plank canoe, was an especially important tool for the procurement of marine resources and for maintaining trade networks between Coastal and Island Chumash. Sea mammals were hunted with harpoons, while deep-sea fish were caught using nets and hooks and lines. Shellfish were gathered from beach sands using digging sticks, and mussels and abalone were pried from rocks using wood or bone wedges. The acorn was an especially important resource for many California tribes. Acorn procurement and processing involved the manufacture of baskets for gathering, winnowing, and cooking and the production of mortars and milling stones for grinding. Bow and arrow, spears, traps and other various methods were used for hunting (Hudson and Blackburn 1983). The Chumash also manufactured various other utilitarian and non-utilitarian items. Eating utensils, ornaments, fishhooks, harpoons, and other items were made using bone and shell. Olivella shell beads were especially important for trade.

The Spanish missions and later Mexican and American settlers dramatically altered traditional Chumash manners of life. Chumash population was drastically reduced by the introduction of European diseases. Nevertheless, many Chumash descendants still inhabit the region.

4.4.1.3 Historic Context

Post-European contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), the Mexican Period (1822–1848), and the American Period (1848–present).

Spanish Period (1769–1822)

Spanish exploration of California began when Juan Rodriguez Cabrillo led the first European expedition into the region in 1542. During this expedition, Cabrillo anchored in Malibu Lagoon and named the area Pueblo de las Canoas for the Chumash canoes. For more than 200 years after the initial expedition, Spanish, Portuguese, British, and Russian explorers sailed the California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968; Rolle 2003). In 1769, Gaspar de Portolá and Franciscan Father Junipero Serra established the first Spanish settlement at Mission San Diego de Alcalá. This was the first of 21 missions erected by the Spanish in what was then known as Alta (upper) California between 1769 and 1823. Mission San Buenaventura was founded in 1782. It was during this time that initial Spanish settlement of the project vicinity began.

Mexican Period (1822-1848)

The Mexican Period commenced when news of the success of the Mexican Revolution (1810-1821) against the Spanish crown reached California in 1822. This period saw the privatization of mission lands in California with the passage of the Secularization Act of 1833. This Act enabled Mexican governors in California to distribute mission lands to individuals in the form of land grants. Successive Mexican governors made more than 700 land grants between 1822 and 1846, putting most of the state's lands into private ownership for the first time (Shumway 2007). About 20 land grants (ranchos) were located in Ventura County. The approximately 26,623-acre Rancho Las Posas, originally granted to Jose Carrillo in 1824 (or 1834, depending on the source) and later confirmed to Jose de la Guerra y Noriega (Mason 1883; Stork 1891; Westergaard 1920), includes the project site.

In 1846, the Mexican-American War was initiated following the annexation of Texas by the United States and a dispute over the boundary of the state between the United States and Mexico. On January 10, leaders of the pueblo of Los Angeles surrendered peacefully after Mexican General Jose Maria Flores withdrew his forces. Shortly thereafter, newly appointed Mexican Military Commander of California, Andrés Pico, surrendered all of Alta California to U.S. Army Lieutenant Colonel John C. Fremont in the Treaty of Cahuenga (Nevin 1978).

American Period (1848-Present)

The Mexican Period officially ended in February 1848 with the signing of the Treaty of Guadalupe Hidalgo, formally concluding the Mexican-American War. Per the treaty, the United States agreed to pay Mexico $15 million for conquered territory, including California, Nevada, Utah, and parts of Colorado, Arizona, New Mexico and Wyoming. California gained statehood in 1850, and this political shift set in motion a variety of factors that began to erode the rancho system.

In 1848, the discovery of gold in northern California led to the California Gold Rush, though the first gold was found in 1842 in San Francisquito slightly east of Ventura County (Workman 1935: 107; Guinn 1977). The presence of commercial grade oil in Ventura County was recognized in 1852 at Rancho Ojai (Franks and Lambert 1985).

By 1853, the population of California exceeded 300,000. Horticulture and livestock continued to dominate the southern California economy through 1850s. Despite a severe drought in the 1860s, which decimated cattle herds and drastically affected rancheros' source of income, thousands of settlers and immigrants continued to pour into the state after the completion of the transcontinental railroad in 1869. Property boundaries that were loosely established during the Mexican era led to disputes with new incoming settlers, problems with squatters, and lawsuits. Due to the initiation of property taxes, many southern California ranchers became encumbered by debt and the cost of legal fees to defend their property, and much of the rancho lands were sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944).

Ventura County was officially divided from Santa Barbara County in 1873. The Saugus to Santa Barbara Branch (or Santa Paula Branch) of the Southern Pacific Railroad was constructed in the mid-1880s, encouraging travel through, and settlement of the Santa Clara River Valley, as well as creating a large distribution network for its citrus and other products (Sperry 2006). In the 1880s, a dramatic boom arrived in southern California, fueled by various factors including increasingly accessible rail travel, agricultural development and improved shipment methods, and favorable advertisement (Dumke 1944). The first version of the Southern Pacific's Coast Line, between Los Angeles and Santa Barbara, was completed in 1900 through the Santa Clara Valley. A later version through Santa Susana Pass and bypassing the Saugus Branch was completed in 1904, offering a coastal alternative to the Central Valley mainline.

4.4.1.4 Local Context – Town of Somis

The town of Somis was developed on the lands of Rancho Las Posas. Thomas Bard and David T. Perkins, in pursuing land development, formed the Las Posas Land and Water Company in 1888 and leased Rancho Las Posas land to farmers who grazed sheep, and grew barley, wheat, beans, beets and walnuts, among other crops (Triem 1985; Gidney 1917; Storke 1891). The wharf in Hueneme served these farmers in shipping their products. In 1892 Thomas Bard had a survey completed and the town site laid out; its name is said to have come from the Chumash name for scrub oak spring (Triem 1985). Running through the center of the town was Central Avenue (today called Somis Road) and intersecting streets included North Street, and Rice Street and Bell Street, named after the farming families who owned the nearby land: Peter Rice and Robert Bell (Ventura County Recorder 1892). Sale of town lots carried a stipulation prohibiting the use of alcohol for manufacture, sale or consumption. In 1900, the Southern Pacific Railroad extended a branch line through Somis which was completed through Santa Susanna in 1904, improving local farmers' access to outside markets (Triem 1985).

Somis remained an agricultural community with slow growth, with a population of approximately 75 residents reported before World War II. Shortly after the war ended, subdivision of land created additional town lots, expanding the town size (Ventura County Recorder 1948 and 1953). Somis' population grew to 400 residents by 1992 (McClellan 1992). The current Somis population is approximately 3,000.

4.4.1.5 Cultural Resources Records Search

A records search of the California Historical Resources Information System (CHRIS) was conducted at South Central Coastal Information Center (SCCIC) at California State University, Fullerton on April 3, 2020 to identify previously recorded cultural resources, as well as previously conducted cultural resources studies within the project site and a 0.5-mile radius surrounding it. The National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historical Landmarks list, and Built Environment Resources Directory, as well as its predecessor the California State Historic Property Data File, were also reviewed. These records did not identify any cultural resources on the project site or immediate vicinity. Additionally, the Archaeological Determination of Eligibility list was reviewed. Results of the records search can be found in Appendix A of the Cultural Resources Assessment (Appendix E).

The SCCIC records search identified 14 previously conducted cultural resources studies within a 0.5-mile radius of the project site. Three studies (VN-00575, VN-00590, and VN-01838) include a portion of the project site and are summarized below.

VN-00575

Robert Lopez prepared VN-00575 as part of the Proposed Swepi Well Locations and Pipeline Routes in 1988. The study was for a proposed subdivision of a 129-acre parcel. This study included literature review and field reconnaissance of a 17.8-acre parcel and approximately 35 miles of pipeline. Robert Lopez observed three previously recorded cultural resources along portions of the proposed pipeline. None of these resources are on the project site or within the 0.5-mile buffer.

VN-00590

Robert Lopez prepared VN-00590, as part of the proposed Off-Campus Center Siting Study for the California State University in 1986. This study included background research and a field survey. No cultural resources were identified. Lopez analyzed five locations throughout Ventura County, totaling 1,624 total acres. The portion of VN-00590 within the cultural study area is negative for cultural resources and no other portions of VN-00590 are within 0.5 mile of the project site.

VN-01838

Robert Lopez prepared VN-00345, *An Archaeological Reconnaissance of the Area Involved in Parcel Map Waiver No. 970, Ventura County, California*, in 1999. The study was for a proposed subdivision of a 129-acre parcel. This study included a records search of the Ventura County Archaeological Society and the University of California, Los Angeles' Archaeological Information Center, literature review, and a field reconnaissance. Lopez observed no resources during any portion of the cultural study area.

4.4.1.6 Cultural Field Survey Results – Built Environment Resources

A qualified archaeologist and a qualified architectural historian conducted pedestrian surveys of the project site on April 28 and August 25, 2020. The built environment pedestrian survey consisted of a visual inspection of all built environment features over 45 years of age. Buildings and associated features were documented to assess their construction, alterations, overall condition and integrity, and to identify any potential character-defining features.

2789 Somis Road

The archival research and field survey identified a grouping of eight buildings sited in the southeastern portion of the project site with an associated address of 2789 Somis Road. Because this grouping contains buildings that are over 45 years of age and are historically associated with one another, it was recorded and evaluated for historical significance as a single resource on California Department of Parks and Recreation 523 Series Forms (DPR forms), which are included in Appendix C of the Cultural Resources Assessment (EIR Appendix E). Below is a summary of the property's existing conditions, developmental history, and eligibility for listing in the NRHP and CRHR and as a Ventura County Landmark.

Property Description

The property at 2789 Somis Road is used for agricultural production and is located adjacent to and west of Somis Road, slightly north of Las Posas Road, in unincorporated Ventura County. Originally part of a larger ranch, the site is currently 36.36 acres and includes a grouping of eight residential and support buildings at the southeast corner, otherwise surrounded by agricultural fields (Figure 4.4-1). Access is provided by an unpaved road (Bell Ranch Road) that branches off Somis Road and enters the property at east. The eight buildings are surrounded with mature plantings, grassy lawn areas, and accompanying gardens. A single mobile-home is located at the southern portion of the building grouping. There are three agricultural fields located to the south, west, and north of the building grouping respectively. See Figures 6 through 13 in the Cultural Resources Assessment (EIR Appendix E) for photographs of the project site buildings.

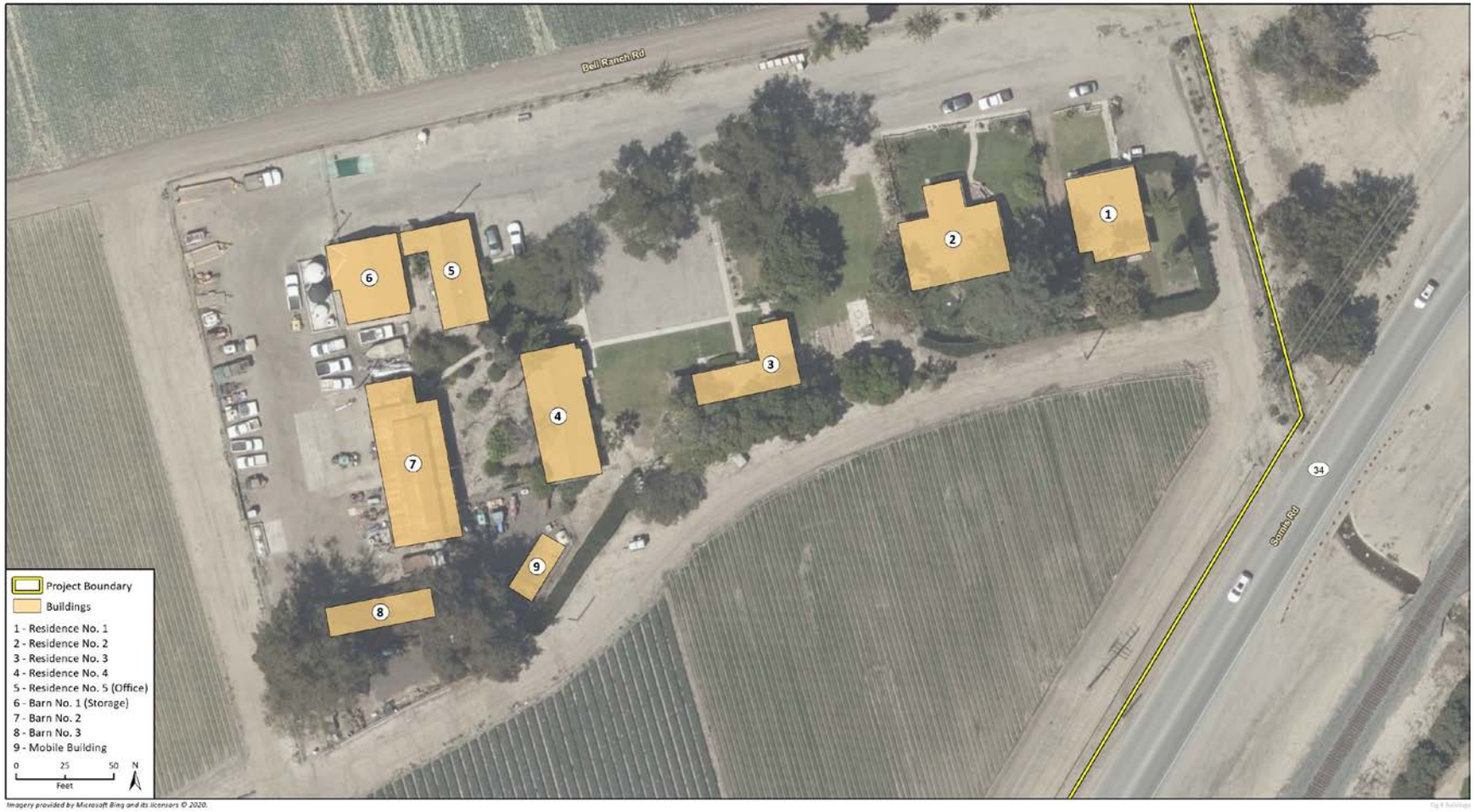
RESIDENCE NO. 1

The easternmost building on the project site is a one-story, rectangular-planned residence. The vernacular bungalow-style building sits on a concrete foundation, is clad in wooden lap siding, and exhibits original one-over-one wood sash windows of various sizes throughout. The primary entry to the building, a single, multi-panel wooden door that appears original, is offset on the north elevation. The building is topped with a low-pitched front-gabled roof with moderate overhanging eaves, which are enclosed and supported with three cantilevered exposed beams. Slatted wooden gable vents are present. A satellite dish has been mounted to the roof. Surrounding the residence inside a white picket fence is a lush lawn and mature plantings including palm and orange trees in addition to ornamentals. Although research limitations prevented definitively dating the building, based on visual observation, it appears to date to circa 1920. The building appears minimally altered and is in good condition.

RESIDENCE NO. 2

Sited roughly 30 feet west of Residence No. 1 and separated by a hedge row of mature plantings, Residence No. 2 is a one-story T-planned vernacular building also built in a bungalow style. The building is clad in wooden lap siding and features one-over-one wood sash windows of various size throughout in addition to a single-light picture window on the primary (north) elevation, also wood-framed. Two entrances to the building, single wooden multi-light doors, are accessible via a semicircular concrete patio at the front of the building. The building is topped with a low-pitched intersecting gabled roof with moderate overhanging eaves clad in asphalt shingles. Eaves are enclosed and supported with cantilevered exposed beams. Slatted wooden gable vents are present and the building features two brick and mortar chimneys. Surrounding the building inside a wooden horizontal fence is a lush lawn and mature plantings including palm, avocado and cypress trees in

Figure 4.4-1 Buildings Associated with 2789 Somis Road



addition to ornamentals. Although research limitations prevented definitively dating the building, based on visual observation, it appears to date to circa 1920. The building appears minimally altered and is in good condition.

RESIDENCE NO. 3

Sited roughly 60 feet west of Residence No. 2 and set back roughly 50 feet further south y, Residence No. 3 is a one-story, L-planned vernacular building built in a bungalow style. The building sits on a raised poured concrete perimeter foundation and is clad in wooden lap siding. Visual observation suggests its footprint was expanded westward following its initial construction, potentially more than one time. The original portion of the building features one-over-one wood sash windows, some which appear in pairs, while the apparent addition features aluminum and vinyl sliders. The building includes several entryways, two of which on the primary, north elevation are contained under gabled overhangs supported by wooden columns; these are accessible via two concrete steps.

In the western portion of the building is a passthrough that leads from the front to the rear of the building. Although contained under a single roof structure, the passthrough functionally divides the building into two individual interior spaces. The building is topped with a low-pitched, intersecting gabled roof clad in asphalt shingles. Exposed rafters and cantilevered decorative exposed beams support the roof. Slatted wooden gable vents are present, and no chimneys appear extant. The building is set back behind and surrounded by a lawn and decorative plantings including rose bushes. Surrounding the building inside a wooden horizontal fence is a lush lawn and mature plantings including palm, avocado and cypress in addition to ornamentals. Although research limitations prevented definitively dating the building, it appears to have been built before 1945. Aside from the aforementioned addition, the building appears minimally altered and is in good condition; it is currently being used as an office.

RESIDENCE NO. 4

Residence No. 4 is sited roughly 40 feet west of Residence No. 3. The vernacular bungalow-style residence is a one-story and features a rectangular footprint. The building sits on a raised concrete perimeter foundation and is clad in wooden lap siding. It features one-over-one wood sash windows that appear in pairs or groupings of three. Two entrances are included, one offset (to the north) on the east elevation and another offset (to the south) on the west. Both entrances feature a single wooden door accessible via a concrete step and small porch sheltered under a gabled overhang supported with square wooden columns. The door at rear is topped with a single-light wooden transom sash; that on the primary, east elevation is bracketed with windows. The building is topped with a low-pitched, gabled roof clad in asphalt shingles. Exposed rafters and cantilevered exposed beams (decorative) support the roof. Slatted wooden gable vents are present. A brick and mortar chimney featuring a stepped design is exposed on the north elevation. The building is set back behind and surrounded by a lawn and ornamental plantings including beds of lilies. Mature cypress and orange trees surround the building at rear. Although research limitations prevented definitively dating the building, based on visual observation, it appears to have been built before 1945. The building appears minimally altered and is in good condition; it is currently being used as an office.

RESIDENCE NO. 5

Sited just northwest of Residence No. 4, Residence No. 5 is a one-story residence exhibiting an L-shaped footprint. The vernacular building is clad in wooden board and batten siding and features

one-over-one wood sash windows of varying size. The building is topped with an intersecting, medium-pitched gabled roof clad in asphalt shingles with exposed rafters. A partial length concrete porch sheltered under the main roof structure lines the primary, east elevation. The building's primary entry, a single wooden door covered with a wooden screen door, is accessible via the porch. The building includes two secondary entrances on the north and west elevations, both accessible via steps and a concrete stoop. The door on the north elevation appears non-original while all other doors and windows appear original. The building is surrounded with mature vegetation, including cypress trees and rose bushes, to its south and west. Although research limitations prevented definitively dating the building, based on visual observation, it appears to predate the Residence Nos. 1 and 2 and is estimated to have been built earlier in the twentieth century. It appears minimally altered and is in good condition.

Barn No. 1

Barn No. 1 is a one-story, rectangular-planned utilitarian building sited adjacent to the west of Residence No. 4. The building is topped with a gabled roof with moderate overhangs and exposed rafters clad in rolled asphalt. It is clad in wooden lap siding and exhibits no window openings. Original barn doors on the north and south elevations have been removed and their large openings infilled with a combination of board and batten siding and solid, contemporary doors (two on each elevation). A small shed-like addition has been added to the building's northwest corner to provide covered storage. Compared with property residences, the building is surrounded with minimal vegetation. Although research limitations prevented definitively dating the building it appears to date to have been built before 1945. It appears relatively intact and in fair condition; it is currently used for storage.

Barn No. 2

Located roughly 25 feet south of Barn No. 1, Barn No. 2 is a monitor barn with an apparent addition on the north end, creating roughly a L-shaped plan. It is clad in corrugated vertical metal paneling. The building is topped with a gabled clerestory roof clad in corrugated metal paneling consistent with siding material. It exhibits limited window openings; those extant throughout are relatively small and include various types of metal window sash. Large door openings are featured on the south and west elevations of the building. An original sliding metal-clad barn door remains extant on the south elevation door opening; the door on the west elevation appears to be non-original. Compared with the property's residences, the building is surrounded with minimal vegetation. Although research limitations prevented definitively dating the building it appears to date to have been built before 1945. The building appears relatively intact and in fair condition; it is currently used as a workshop.

Barn No. 3

Barn No. 3 is located roughly 20 feet south of and sited trending west-east to face Barn No. 2. The utilitarian building is a one story in height and features a rectangular footprint. It is clad in vertical wooden siding (some areas are board-and-batten), painted red. The building is topped with an exaggerated shed roof clad in corrugated metal paneling with minimal overhang and exposed rafters. Minimal window openings are included but the primary (north) elevation is lined with large openings covered with wooden sliding barn doors that appear original. It is surrounded with minimal vegetation although two large eucalyptus trees are extant to its immediate rear (south). Although research limitations prevented definitively dating the building it appears to date to have

been built before 1945. The building appears minimally altered and is in fair condition; it is currently used for storage.

Property History

The built environment at 2789 Somis Road was once part of a larger ranch established in the 19th century. Known as Bell Ranch, it was initially developed in the 1870s by early and notable Ventura County settlers Peter Rice and Robert Bell, and subsequently operated by Thomas Bard's Berylwood Investment Company beginning in the early 20th century. As discussed further below, these individuals and entities made significant contributions to the early agricultural development in Ventura County.

Peter Rice was born in Pennsylvania in 1818 and moved to Ohio with his parents at the age of five. As an adult he worked in the purchase and sale of cattle, and in the fur business, at which he was very successful. Rice bought a farm in Richland County, Ohio and married Isabella Turbutt. In 1849 they set out for California and initially settled in the northern part of the state. Rice was involved in mining, lumber, stagecoach lines, and the building of bridges and turnpikes. Drawn by the discovery of silver, he went to Virginia City, Nevada and successfully engaged in the development of sawmills and ditches. In 1871 Rice made a trip to Ventura County where he invested in a 1,150-acre ranch on the Rancho Las Posas and eventually relocated his family to the ranch (Mason 1883).

Robert Bell also arrived in Ventura County in 1871 by way of Ohio and northern California. Born in Richland County Ohio in 1842, he initially settled in Yuba County where he worked as a ranchman for several seasons. He relocated to Ventura County in 1871, purchasing 300 acres of land in the Somis area and improving the land to a tillable condition and grew beans, beets and hay. In 1877 he married Peter Rice's daughter, Rebecca Lucretia Rice, and would subsequently have three children, Polly, Bertha and Walter (Guinn 1907).

Soon after their arrival in Ventura County, Peter Rice and Robert Bell established an agricultural partnership known as Rice & Bell in the mid 1870s. By the end of the decade, Rice & Bell were invested in a farm, which appears to have included the current project site, covering 1,130 acres, with up to 3,000 acres also cultivated in adjoining lands (Hampton 2002; Mason 1883). Records from the late 1870s describe Rice & Bell's ranch as having "more the appearance of a village than the homes of quiet farmers; these enterprising and well-known gentlemen farm on so large a scale, that to give anything like a description of their ranch would require more space than we can give at the present" (Hampton 2002). Although it is unclear whether any of these buildings remain within the current project site, Rice & Bell's ranch was described as containing an adobe ranch house, a barn, machinery storehouse, horse stables, a blacksmith shop, four granaries, cribs, and a yard and orange trees. The ranch produced barley, wheat and corn, and was used for hog-raising. In the 1890s, the Rice & Bell ranch was also reported to be growing beans and walnuts. Peter Rice died in 1890, but Bell and his wife Rebecca continued to maintain the farming business into the following decades (Hampton 2002; *Los Angeles Times* 1997). The Bell's 42-year tenure on the ranch established 2789 Somis Road's identity in the community through the following decades as the Bell Ranch.

Around 1920, Robert and Rebecca Lucretia Bell appear to have sold the ranch to the Berylwood Investment Company (*Oxnard Daily Courier* 1923; *Los Angeles Times* 1997). The Berylwood Investment Company was founded in 1911 by Thomas R. Bard, a prominent politician, businessman, and key figure in the development of Ventura County. Soon after its formation and under the direction of the Bard family, Berylwood Investment Company began improvements to properties in the Las Posas and Simi valleys. Thomas' son Richard Bard was appointed general manager in 1917

and various members of the Bard family would continue to oversee leadership roles in the company into the following decades. By the 1950s the company's holdings included nearly 2,000 acres of orchards, over 1,800 acres of beans and other irrigated row crops, and over 3,500 acres of open land and pasture, part of which was planted to barley and hay. This acreage was located at three ranches including the Bell Ranch, Hondo Ranch and Simi Ranch. The company's headquarters were once located in downtown Hueneme but in 1950 moved to a hilltop overlooking Somis, and their original office building became Port Hueneme City Hall (*Oxnard Press Courier* 1957).

Following the transfer of management to the Berylwood Investment Company circa 1920, the ranch became known as the B.I. Bell Ranch, the "B.I." a reference to the ranch's new management (Robertson, n.d.). Although the extant buildings on the property could not be definitively dated due to research limitations, Residence Nos. 1, 2 and 5 were constructed prior to 1927 as demonstrated by an aerial photograph from that year. Residence No. 5 may predate the other buildings. However, it is unclear whether Residences Nos. 1 and 2 were constructed during the property's association with Rice & Bell or the Berylwood Investment Company. The additional extant buildings described above appear to date to the post 1940s per historic aerial photographs (UCSB Map & Imagery Lab, various). Rebecca Lucretia Bell died in 1928 and Robert Bell died in 1930; however, it is unclear where they were living at this time (R.L. Polk & Co. 1956; Hampton 2002; Find a Grave 2020).

In the 1940s the majority of the Bell Ranch (which included the project site and surrounding lands) was planted with orchard rows (UCSB Map & Imagery Lab, various). By the 1950s additional orchards had been planted closer to the hill to the north, and the land south of the ranch complex was planted with lower-scale row crops (UCSB Map & Imagery Lab 1959). It appears subdivision of the ranch land adjacent to Las Posas Road began by the 1960s and continued through the 1970s. By the 1960s some of the former orchard land fronting Las Posas Road (slightly west of the project site) had been developed with various uses that appear to include office, commercial and industrial (NETRonline 1967).

The company Kaiser Aetna purchased the Bell Ranch property from Berylwood Investment Company in 1969 (*Oxnard Press Courier* 1971a). Kaiser Aetna had an Agricultural Services division which provided management services for agricultural properties and conducted real estate development. During its ownership of the Bell Ranch, the company replanted orchards to replace poor performing and diseased trees, installed new irrigation, and planted new citrus and avocado acreage. The Bell Ranch served as headquarters for Kaiser Aetna's Agricultural Services and its Agricultural Operations Division (*Oxnard Press Courier* 1971a and 1977).

Online Ventura County Recorder and Assessor records indicate that by 1970, Kaiser Aetna began surveying the property for subdivision. The project site was included in a tract called the Peter Rice Tract, and the T.R. Bard Tract was mapped adjacent to the north (Ventura County 1970. Record of Survey, 37RS64). Another tract map made in 1974 created several parcels, of which the 112.9-acre Parcel 1 included the subject property (Parcel Map 16PM 98).

In the early 1970s Kaiser Aetna formulated a 10,000-acre master planned, multi-use development for a portion of the project site. At the time, Bell Ranch was described as encompassing 1,200 acres (*Oxnard Press Courier* 1971b). However, the master plan was never fully realized and newspaper accounts state the development area was reduced in size (*Oxnard Press Courier* 1975). The company sold 2+ acre homesites planted with avocado trees near Los Angeles Avenue, and developed properties fronting Las Posas Avenue (which today include a medical building and a school) (*Oxnard Press Courier* 1971a; NETRonline 1967, 1969 and 1978).

In 1977, a new corporation formed by five former employees of Kaiser Aetna and called Ag Land Services Inc. purchased Kaiser Aetna's Agricultural Services Division (*Oxnard Press Courier* 1977). Located at 2789 Somis Road, it appears Ag Land Services Inc. has remained at that location through present day. The company is involved in agricultural consulting and management of numerous ranches in the Somis, Camarillo, Moorpark and Ventura areas (Citrus Pest & Disease Prevention Program 2020).

Since this time, the larger ranch property continued to be further subdivided and developed with new uses. By 1978 St. John's Pleasant Valley Hospital was developed slightly north of Las Posas Road (*Oxnard Press Courier* 1971a; NETRonline 1967, 1969 and 1978). In 1979 the Peter Rice Tract was subdivided leading to the development of a police station, medical offices, and commercial businesses (NETRonline 1989; Google Earth).

The Oxnard Union High School District developed a new high school on a portion of the Bell Ranch property which opened in 2015. Located slightly west of the project site, the new school was named "Rancho Campana," which translates to "Bell Ranch" in Spanish, in honor of the family who once owned the land (Leung 2013; Oxnard Union High School District 2017 and 2020). Records on file with the Ventura County Assessor and Recorder show in 2019 a 40.22-acre parcel was split into two parcels that included the 36.4-acre project site and a smaller 4.64-acre parcel that is now owned by the City of Camarillo.

Historic Evaluation

Based on information available at the time of this study, the project site appears to possess significant associations with the early agricultural history of Ventura County and may be presumed eligible for listing in the CRHR and as a Ventura County Landmark. The exact construction dates of the buildings on the ranch property were unable to be definitively determined due to in-person research constraints resulting from COVID-19 considerations. However, available information indicates the ranch was historically associated with two notable nineteenth century pioneering entities which were influential in Ventura County's agricultural history, Rice & Bell ranch and the Bard family's Berylwood Investment Company. Residence Nos. 1 and 2 appear to have been built circa 1920, around the time the Berylwood Investment Company assumed ownership of the ranch. Residence No. 5 appears to have been built earlier, but further research would be necessary to substantiate. It is unclear what if any extant buildings on the site are associated with the Rice & Bell period. However, the Berylwood Investment Company maintained a noteworthy presence in Ventura County's growth during and after this period, supported in part by the project site. Further, the buildings on the property are largely intact and representative of early twentieth century agricultural practices within Ventura County and embody the distinctive characteristics of this period of architectural history. For these reasons, the portion of the project site located at 2789 Somis Road appears to be eligible under CRHR Criteria 1 and 3, and Ventura County Landmark Criteria 1, 2, and 5. The original Bell Ranch has been continually subdivided and a number of buildings and structures have been removed and replaced; however, the ranch still retains multiple buildings from the early twentieth century and maintains its historic character such that it retains sufficient integrity to convey its significant associations.

Although the ranch property is associated with Peter Rice and Robert Bell, their association with the extant buildings cannot be definitively documented at this time. Further, while Thomas R. Bard and other members of the Bard family who founded and led the Berylwood Investment Company have are associated with the property, this association is tangential, and the subject property is not directly illustrative of any significance these individuals may have. For this reason, the portion of the

project site that contains the grouping of buildings at 2789 Somis Road does not appear to be eligible for state or local designation under CRHR Criterion 2 or Ventura County Landmark Criterion 3. Lastly, the CHRIS records search results and archaeological field survey do not indicate that any portion of the project site is eligible for state or local designation under CRHR Criterion 4 or Ventura County Landmark Criterion 4.

4.4.1.7 Regulatory Setting

Federal Regulations

National Register of Historic Places

Cultural resources are considered during federal undertakings chiefly under Section 106 of the National Historic Preservation Act of 1966 (as amended) through one of its implementing regulations, 36 Code of Federal Regulations (CFR) 800 (Protection of Historic Properties), as well as the National Environmental Policy Act. Properties of traditional religious and cultural importance to Native Americans are considered under Section 101(d)(6)(A) of the National Historic Preservation Act. Other federal laws include the Archaeological and Historic Preservation Act of 1974, the American Indian Religious Freedom Act of 1978, the Archaeological Resources Protection Act of 1979, and the Native American Graves Protection and Repatriation Act of 1989, among others.

Section 106 of the National Historic Preservation Act (16 United States Code 470f) requires federal agencies to take into account the effects of their undertakings on any district, site, building, structure, or object included in or eligible for inclusion in the NRHP, and to give the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings (36 CFR 800.1). Under Section 106, the significance of any adversely affected cultural resource is assessed and mitigation measures are proposed to reduce any impacts to an acceptable level. Significant cultural resources are those listed in or eligible for listing in the NRHP per the criteria listed below (36 CFR 60.4).

Certain properties are usually not considered for eligibility for the NRHP. These include ordinary cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or use for religious purposes, moved or reconstructed structures, properties primarily commemorative in nature, or properties that have become significant within the last 50 years. These types of properties can qualify if they are an integral part of a district that does meet the criteria, or if they fall within certain specific categories relating to architecture or association with historically significant people or events. The vast majority of archaeological sites that qualify for listing do so under Criterion D, Research Potential.

State Regulations

California Register of Historical Resources

The CRHR was created by Assembly Bill 2881, which was established in 1992. The CRHR is an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (Public Resources Code, 5024.1(a)). The criteria for eligibility for the CRHR are consistent with the NRHP criteria but have been modified for state use in order to include a range of historical resources that better reflect the history of California (Public Resources Code, 5024.1(b)). Certain properties are

determined by the statute to be automatically included in the CRHR by operation of law, including California properties formally determined eligible for, or listed in, the NRHP.

The CRHR consists of properties that are listed automatically and those that must be nominated through an application and public hearing process. The CRHR automatically includes the following:

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

Criterion 2: Is associated with the lives of persons important in our past

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

Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting one or more of the above criteria, the CRHR requires sufficient time to have passed to allow a "scholarly perspective on the events or individuals associated with the resource." Fifty years is a general estimate of the time needed to understand the historical importance of a resource, according to the state Office of Historic Preservation. The CRHR also requires a resource to possess integrity, defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association." Archaeological resources can sometimes qualify as "historical resources" (CEQA Guidelines, Section 15064.5[c][1]).

According to CEQA, all buildings constructed over 50 years ago and that possess architectural or historical significance may be considered potential historic resources. Most resources must meet the 50-year threshold for historic significance, but resources less than 50 years in age may be eligible for listing on the CRHR if it can be demonstrated that sufficient time has passed to understand their historical importance.

If a project can be demonstrated to cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a], [b], and [c]).

PRC Section 21083.2(g) defines a *unique archaeological resource* as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

Criterion 1: Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information

Criterion 2: Has a special and particular quality such as being the oldest of its type or the best available example of its type

Criterion 3: Is directly associated with a scientifically recognized important prehistoric or historic event or person

The state administers two other programs: California Historical Landmarks and California Points of Historical Interest. California Historical Landmarks are buildings, sites, features, or events of statewide significance with anthropological, cultural, military, political, architectural, economic,

scientific or technical, religious, experimental, or other historical value. California Points of Historical Interest are buildings, sites, features, or events local (county or city) significance with anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value.

Local Regulations

Ventura County Cultural Heritage Ordinance

Ventura County Ordinance No. 4225, known as the Cultural Heritage Ordinance, delineates the criteria utilized to assess the eligibility of a potential Cultural Heritage Site, and the manner by which Cultural Heritage Sites are designated. An improvement, natural feature or site may become a designated Cultural Heritage Site if it meets the following applicable criteria:

A. **Landmark** – Satisfy one of the following criteria:
   1. It exemplifies or reflects special elements of the County's social, aesthetic, engineering, architectural or natural history;
   2. It is associated with events that have made a significant contribution to the broad patterns of Ventura County or its cities, regional history or the cultural heritage of California or the United States;
   3. It is associated with the lives of persons important to Ventura County or its cities, California or national history;
   4. It has yielded, or has the potential to yield, information important to the prehistory or history of Ventura County or its cities, California or the nation.
   5. It embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of a master or possesses high artistic values;
   6. Integrity. Establish the authenticity of the resource's physical identity by evidence of lack of deterioration and significant survival of the characteristics that existed during its period of importance. This shall be evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling and association.

B. **Sites of Merit** – Satisfy the following criteria:
   1. Sites of historical, architectural, community or aesthetic merit which have not been designated as a landmark or point of interest, but which are deserving of special recognition; and
   2. County approved surveyed sites with a National Register status code of 5 or above.

C. **Points of Interest** – Satisfy any one the following criteria:
   1. That is the site of a building, structure or object that no longer exists, but was associated with historic events, important persons or embodied a distinctive character or architectural style; or
   2. That it has historical significance, but has been altered to the extent that the integrity of the original workmanship, materials or style has been substantially compromised; or
   3. That the site of a historic event which has no distinguishable characteristics other than that a historic event occurred at that site, and the site is not of sufficient historical significance to justify the establishment of a landmark.

D. **District** – Satisfy the following criteria:
   1. Possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.
   2. Has precisely mapped and defined exterior boundaries, which requires a description of what lies immediately on the edge of the district to allow rational exclusion of adjoining areas.
   3. Has at least one of the criteria for significance of Section 1365-5.a. 1-8
   4. Complies with the criteria for integrity contained in Section 1365-5.a.6.

In addition to meeting the criteria in Sec. 1365-5 et seq., all the following standards must be met before a site becomes a designated Cultural Heritage Site:

A. It shall have historic, aesthetic or special character or interest for the general public, and not be limited in interest to a special group of persons;
B. Its designation shall not require the expenditure by the County of Ventura of any amount of money not commensurate with the value of the object to be preserved; and
C. Its designation shall not infringe upon the rights of a private owner thereof to make any and all reasonable uses thereof which are not in conflict with the purposes of this Article.

Ventura County General Plan

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goal 1.6.1-1 and Policies 1.6.2-1 and 1.6.2-6 pertain to historic resources.

- **Goals**
  - **1.8.1-1.** Identify, inventory, preserve, and protect the paleontological and cultural resources of Ventura County (including archaeological, historical, and Native American resources) for their scientific, educational, and cultural value.
  - **1.8.1-1.** Enhance cooperation with cities, special districts, other appropriate organizations, and private landowners in acknowledging and preserving the County's paleontological and cultural resources.
- **Policies**
  - **1.8.2-1.** Discretionary developments shall be assessed for potential paleontological and cultural resource impacts, except when exempt from such requirements by CEQA. Such assessments shall be incorporated into a Countywide paleontological and cultural resource data base.
  - **1.8.2-2.** Discretionary development shall be designed or re-designed to avoid potential impacts to significant paleontological or cultural resources whenever possible. Unavoidable impacts, whenever possible, shall be reduced to a less than significant level and/or shall be mitigated by extracting maximum recoverable data. Determinations of impacts, significance and mitigation shall be made by qualified archaeological (in consultation with recognized local Native American groups), historical or paleontological consultants, depending on the type of resource in question.
  - **1.8.2-3.** Mitigation of significant impacts on cultural or paleontological resources shall follow the Guidelines of the State Office of Historic Preservation, the State Native American

Heritage Commission, and shall be performed in consultation with professionals in their respective areas of expertise.

- **1.8.2-4.** Confidentiality regarding locations of archaeological sites throughout the County shall be maintained in order to preserve and protect these resources from vandalism and the unauthorized removal of artifacts.
- **1.8.2-5.** During environmental review of discretionary development, the reviewing agency shall be responsible for identifying sites having potential archaeological, architectural or historical significance and this information shall be provided to the County Cultural Heritage Board for evaluation.
- **1.8.2-6.** The Building and Safety Division shall utilize the State Historic Building Code for preserving historic sites in the County.

4.4.2 Impact Analysis

4.4.2.1 Significance Thresholds

Per the Initial Study Assessment Guidelines (County 2011), impacts related to historical resources would be potentially significant if the proposed project would:

1. Demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources;
2. Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code;
3. Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA;
4. Demolish, relocate, or alter an historical resource such that the significance of the historical resource will be impaired [Public Resources Code, Sec. 5020(q)]; and/or
5. Be inconsistent with the applicable General Plan Goals and Policies for "Cultural Resources – Historic" in the County's Initial Study Assessment Guidelines.

According to the County's Initial Study Assessment Guidelines and Section 15064.5 of the CEQA Guidelines, a project with an effect that may cause a substantial adverse change in the mandatory significance, presumptive significance or discretionary significance of an historical resource is a project that may have a significant effect on the environment. Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired. If a historical resource is deemed not significant, the effects of the project on that resource shall be considered a less than significant effect on the environment.

4.4.2.2 Project Impacts and Mitigation Measures

Threshold 1:	Would the project demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources?
Threshold 2:	Would the project demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code?
Threshold 3:	Would the project demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA?
Threshold 4:	Would the project demolish, relocate, or alter an historical resource such that the significance of the historical resource will be impaired [Public Resources Code, Sec. 5020(q)]?

IMPACT CUL-1 THE PROJECT WOULD NOT DEMOLISH, RELOCATE, OR ALTER IN AN ADVERSE MANNER THE PHYSICAL CHARACTERISTICS OF HISTORICAL RESOURCES ON THE PROJECT SITE. IMPACTS TO HISTORICAL RESOURCES WOULD BE LESS THAN SIGNIFICANT.

As discussed in the Setting, available information suggests that the grouping of buildings at 2789 Somis Road is eligible for listing in the CRHR and as a Ventura County Landmark. This portion of the project site is therefore presumed to be a historical resource under CEQA.

The proposed project would not involve demolition or direct alteration of any of the buildings at 2789 Somis Road. The proposed continued agricultural use parcel would retain the existing residential and agricultural buildings and remain in agricultural production. In addition, the proposed housing complex would include a landscaped buffer to separate it from the existing buildings.

Under Section 15064.5(b) of the CEQA Guidelines, a significant impact to a historical resource would occur if the physical characteristics of the resource that convey its historical significance and justify its eligibility for inclusion in the CRHR. Although the project would result in the subdivision of the project site, the historical boundaries of the ranch at 2789 Somis Road were once much larger and the ranch has been continually subdivided in the post-World War II era. Further, the buildings and agricultural activity on this portion of the site would be retained. The proposed residential development would change aspects of the project site's surroundings; however, its setting has already largely changed since the historical period due to ongoing subdivision and new construction. The proposed development is consistent with these non-historical elements and would not further diminish the setting. Additionally, the proposed housing complex development would be further buffered and distinguished from the historic buildings through landscaping. Therefore, the project would result in a less than significant impact to historical resources under CEQA.

Mitigation Measures

No mitigation is required.

Threshold 5:	Would the project be inconsistent with the applicable General Plan Goals and Policies for "Cultural Resources – Historic" in the County's Initial Study Assessment Guidelines?

IMPACT CUL-2 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would be consistent with the County General Plan goals and policies listed previously under Regulatory Setting. The project would not preclude the County from implementing goals applicable to historic resources, including "identify[ing], inventory, preserv[ing], and protect[ing]…cultural resources of Ventura…for their scientific, educational, and cultural value" (Goal 1.8.1-1) and "enhance[ing] cooperation with cities, special districts, other appropriate organizations, and private landowners in acknowledging and preserving the County's…cultural resources" (Goal 1.8.1-2). With completion of the Cultural Resources Assessment (Appendix E), the project is in compliance with Policies 1.8.2-1 through 1.8.2-6.

With implementation of state and County regulations outlined above in the section, the project would be consistent with the General Plan goals and policies pertaining to historic resources. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.4.2.3 Cumulative Impacts

Impacts to historic and archaeological resources are generally site-specific. For cumulative projects listed in Table 3-1 that would result in significant impacts to historical resources, conditions and mitigation measures would be required through site-specific investigations and surveys as well as the assessment of potential impacts and prescription of appropriate mitigation. As with the project, other cumulative development that would result in potential impacts to historical resources would also be subject to applicable federal, state, and local regulations and ordinances for historical resources. Accordingly, as required under applicable laws and regulations, potential impacts associated with cumulative developments would be addressed on a case-by-case basis.

As described in Impact CUL-1, the project would not result in the loss of any significant identified historical resources. Therefore, the project would not contribute considerably to the cumulative loss of historical resources in the vicinity.

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4.5 Noise and Vibration

This section discusses the project's potential impacts relating to noise and vibration. It considers both the temporary impacts relating to construction activities and potential long-term impacts associated with project operation.

4.5.1 Setting

4.5.1.1 Noise Overview

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by hearing organs (e.g., the human ear). Noise is defined as sound, which is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (Caltrans 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels to be consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler et al. 1999). Decibels are measured on a logarithmic scale, which quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Crocker 2007).

Human perception of noise has no simple correlation with sound energy; the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted the average healthy ear can barely perceive an increase (or decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); a change of 5 dBA is readily perceptible (8 times the sound energy); and an increase (or decrease) of 10 dBA sounds twice (or half) as loud (10.5 times the sound energy) (Crocker 2007).

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in sound level as the distance from the source increases. The manner by which noise reduces with distance depends on factors such as the type of noise source (e.g., point or line), the path the sound will travel, site conditions, and obstructions. Noise levels from a point source (e.g., construction, industrial machinery, ventilation units) typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance. Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance (Caltrans 2013). Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking line of sight will provide at least a 5-dBA reduction in source noise levels at the receiver (FHWA 2011). Structures can substantially reduce occupants' exposure to noise as well. The FHWA's guidelines indicate modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

The time of day when noise occurs and the duration of the noise are also important. Most noise lasting for more than a few seconds is variable in its intensity. Consequently, a variety of noise

descriptors have been developed. One of the most frequently used noise metrics is the equivalent noise level (L_{eq}), which considers both duration and sound power level. L_{eq} is defined as the single steady A-weighted level equivalent to the same amount of energy contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, L_{eq} is summed over a one-hour period (1H). L_{max} is the highest root mean squared (RMS) sound pressure level within the sampling period, and L_{min} is the lowest RMS sound pressure level within the measuring period (Crocker 2007). Normal conversational levels are in the 60 to 65 dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

Noise occurring at night tends to be more disturbing than noise occurring during the day. Community noise is usually measured using Day-Night Average Level (L_{dn}), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.). Community noise can also be measured using Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. (Caltrans 2013). Noise levels described by L_{dn} and CNEL usually differ by about 1 dBA. Quiet suburban areas typically have CNEL noise levels in the range of 40 to 50 CNEL, while areas near arterial streets are in the 50 to 60+ CNEL range.

4.5.1.2 Vibration Overview

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hz. The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body starts from a low frequency of less than 1 Hz and goes to a high of about 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (FTA 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Discontinuities in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is impacted by vibration, a ground-to-foundation coupling loss will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may actually amplify the vibration level due to structural resonances of the floors and walls.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or RMS vibration velocity. The PPV and RMS velocity are normally described in inches per second. PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

4.5.1.3 Ambient Noise Levels

The project site is located in an urban area with the primary sources of noise in the project vicinity being vehicles (e.g., automobiles, buses, and trucks) along Somis Road (Highway 34) and Las Posas Road, as well as agricultural operations and noise generated from Rancho Campana High School. Motor vehicle noise is characterized by a high number of individual events, which often create sustained noise levels. Ambient noise levels would be expected to be highest during the daytime and rush hour unless congestion slows speeds substantially. According to the County of Ventura General Plan Hazards Appendix, noise levels generated by traffic on Highway 34 at the project site are between 50 and 55 dBA CNEL (County of Ventura 2013b).

The County of Ventura General Plan Noise Element defines noise-sensitive receivers as residences, schools, hospitals, nursing homes, churches, and libraries (County of Ventura 2010). The closest noise-sensitive receivers include Rancho Campana High School to the west of the Project site at a distance of approximately 350 feet to the nearest structure, the Church of Jesus Christ of Latter-day Saints to the south of the project at a distance of approximately 500 feet, single-family residences located approximately 460 feet southeast of the Project site, and the Camarillo Public Library approximately 950 feet to the southwest of the Project site.

The airport nearest to the project site, the Camarillo Airport, is located approximately 4.1 miles to the southwest. The project site is not located within the noise contours of the airport (Airport Comprehensive Land Use Plan for Ventura County 2000).

4.5.1.4 Regulatory Setting

Federal Regulations

Federal Transit Administration Ground borne Vibration Guidelines

Sections 5 and 6 of the Transit Noise and Vibration Impact Assessment Manual, adopted by the FTA in September 2018, addresses the federal guidelines used to evaluate a project for potential vibration impacts. The vibration impact analysis is a multi-step process used for determining vibration analysis level, determining vibration impact criteria, and evaluating vibration impact. FTA guidelines state that the threshold of perception for humans is approximately 65 vibration decibels (VdB). A vibration level of 85 VdB can result in strong annoyance, and a vibration level of 100 VdB is the threshold of potential damage (FTA 2018). Construction activity can result in varying degrees of ground vibration depending on the equipment and methods employed, and older and more fragile buildings must receive special consideration. These guidelines are advisory and should be used to assess the impacts of ground borne vibrations created from transit and construction sources.

State Regulations

California Building Code

CCR Title 24, Building Standards Administrative Code, Part 2, and the California Building Code codify the state noise insulation standards. These noise standards apply to new construction in California to control interior noise levels as they are affected by exterior noise sources. The regulations specify that interior noise levels for residential and school land uses should not exceed 45 CNEL.

California General Plan Guidelines

The California General Plan Guidelines, published by the Governor's Office of Planning and Research, indicate acceptable, specific land use types in areas with specific noise exposure. The guidelines also offer adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. These guidelines are advisory, and local jurisdictions, including the County of Ventura, have the responsibility to set specific noise standards based on local conditions.

Local Regulations

County of Ventura General Plan

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goal 2.16.1 and Policies 2.16.2-1 through 2.16.2-3 pertain to noise and vibration.

- **Goals**
  - **2.16.1.** To protect the health, safety, and general welfare of County residents by elimination or avoidance of adverse noise impacts on existing and future noise sensitive uses.
- **Policies**
  - **2.16.2-1.** All discretionary development shall be reviewed for noise compatibility with surrounding uses. Noise compatibility shall be determined from a consistent set of criteria based on the standards listed below. An acoustical analysis by a qualified acoustical engineer shall be required of discretionary developments involving noise exposure or noise generation in excess of the established standards. The analysis shall provide documentation of existing and projected noise levels at on-site and off-site receptors, and shall recommend noise control measures for mitigating adverse impacts.
  - **2.16.2-2.** Discretionary development which would be impacted by noise, or generate project related noise which cannot be reduced to meet the standards prescribed in Policy 2.16.2-1, shall be prohibited. This policy does not apply to noise generated during the construction phase of a project.
  - **2.16.2-3.** The priorities for noise control shall be as follows:
    (1) Reduction of noise emissions at the source.
    (2) Attenuation of sound transmission along its path, using barriers, landforms modification, dense plantings, and the like.
    (3) Rejection of noise at the reception point via noise control building construction, hearing protection or other means.

The County of Ventura General Plan states noise-generating facilities constructed near noise sensitive receivers shall not generate outdoor noise levels at nearby sensitive receivers exceeding the following standards, as measured at the exterior wall of the building:

- L_{eq}[1H] of 55 dBA or ambient noise level plus 3 dBA, whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.
- L_{eq}[1H] of 50 dBA or ambient noise level plus 3 dBA, whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.
- L_{eq}[1H] of 45 dBA or ambient noise level plus 3 dBA, whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m.

This analysis utilizes these standards to evaluate the significance of the project's operational noise impacts.

The General Plan also states that noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that:

- Indoor noise levels in habitable rooms do not exceed 45 CNEL.
- Outdoor noise levels do not exceed 60 CNEL or Leq[1H] of 65 dBA during any hour.

4.5.2 Impact Analysis

4.5.2.1 Significance Thresholds

Methodology

Construction Noise

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, construction noise levels were estimated at noise sensitive receivers near the project site. RCNM provides reference noise levels for standard construction equipment, with an attenuation of 6 dBA per doubling of distance for stationary equipment.

Variation in power imposes additional complexity in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle of the activity to determine the L_{eq} of the operation (FHWA 2018). Each phase of construction has a specific equipment mix, depending on the work to be accomplished during that phase. Each phase also has its own noise characteristics; some will have higher continuous noise levels than others, and some have high-impact noise levels.

Construction noise would typically be higher during the heavier periods of initial construction (i.e., site preparation and grading work) and would be lower during the later construction phases (i.e., interior building construction). Typical heavy construction equipment during project grading and site preparation would include dozers and backhoes. It is assumed that diesel engines would power all construction equipment. Construction equipment would not all operate at the same time or location. In addition, construction equipment would not be in constant use during the 8-hour

operating day. A dozer and backhoe were analyzed together for construction noise impacts due to their likelihood of being used in conjunction with one another and therefore a conservative scenario for the greatest noise generation during construction. Using RCNM to estimate noise associated with a dozer and backhoe, noise levels are calculated to be 79.1 dBA L_{eq} (1-hour) at 50 feet (RCNM calculations are included in Appendix F).

Groundborne Vibration

Operation of the proposed project would not include any substantial vibration sources associated with operation. Therefore, construction activities have the greatest potential to generate ground-borne vibration affecting nearby receivers. The greatest vibratory source during construction within the project vicinity would be from a dozer. Neither blasting nor pile driving would be required for construction of the proposed project. Construction vibration estimates are based on vibration levels reported by Caltrans and the FTA (Caltrans 2020, FTA 2018). Table 4.5-1 shows typical vibration levels for various pieces of construction equipment used in the assessment of construction vibration (FTA 2018).

Table 4.5-1 Vibration Levels Measured during Construction Activities

Equipment	PPV at 25 ft. (in/sec)
Large Bulldozer	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003

Source: FTA 2018

Vibration limits used in this analysis to determine a potential impact to local land uses from construction activities, such as blasting, pile-driving, vibratory compaction, demolition, drilling, or excavation, are based on information contained in the FTA *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018), as identified in Table 4.5-2.

Table 4.5-2 FTA Construction Vibration Damage Criteria

Building/Structural Category	Limiting Velocity (PPV in./sec.)
I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Building extremely susceptible to vibration damage.	0.12

Source: FTA 2018

Operational Noise Sources

Noise sources associated with operation of the proposed project would consist of low speed on-site vehicular noise, landscaping maintenance, general conversations, and mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] units and CWWTF equipment). Due to the distances and low noise levels associated with general site activities, on-site traffic, and landscape maintenance, these sources are not considered substantial and are not analyzed further.

On site-noise sources were modeled with algorithms from the SoundPLAN three-dimensional noise model (SoundPLAN), Version 8.2. Propagation of modeled stationary noise sources was based on ISO Standard 9613-2, "Attenuation of Sound during Propagation Outdoors, Part 2: General Method of Calculation." The assessment methodology assumes that all receptors would be downwind of stationary sources. This is a worst-case assumption for total noise impacts since, in reality, only some receivers would be downwind at any one time.

Each HVAC unit would contain a screened split system HVAC unit located on the ground. In the modeling, the units were placed in a likely location (i.e., on the rooftop of each unit). The unit used in this analysis is a typical to larger-sized residential condenser, a Carrier 38HDR060 split system condenser (see Appendix F for specification sheets). The manufacturer's noise data is provided below in Table 4.5-3. All HVAC units were modeled as being three feet above roof elevation. For a conservative scenario, the units were assumed to operate at 100 percent of an hour for 24 hours and were not modeled with screening.

Table 4.5-3 HVAC Noise Levels

Noise Levels in dB[1] Measured at Octave Frequencies							Overall Noise Level in A-weighted Scale (dBA)[1]
125 Hz	250 Hz	500 Hz	1 KHz	2 KHz	4 KHz	8 KHz	
63.0	61.5	64.0	66.5	66.0	64.5	55.5	72.0

[1] Noise Levels for a Carrier 38HDR060 split system condenser (see Appendix F for specification sheets).

Hz = Hertz; KHz = kilohertz

The stationary noise impacts associated with the proposed project's CWWTF would include pump and blower equipment and a backup emergency generator. Noise would occur from the pump and blower equipment operating during the normal treatment process. The lift station pump and motor sets would be submerged and therefore would result in imperceptible noise. The manufacturers specification sheet for the anticipated blower associated with the project reports a noise level of 79.6 dB at one meter (see Appendix F for specification sheets). For a potential backup emergency generator, a Caterpillar 200 kW (60 Hz) diesel generator was modeled based upon Rincon experience with similar facilities and project applicant input. This generator would have a sound power level of 96 dBA. See Appendix F for backup generator specifications. The CWWTF will be enclosed by an approximate 8-foot masonry block wall. For modeling purposes, it was assumed that the generator and blower would be operating simultaneously.

TRAFFIC NOISE

Noise levels affecting the proposed project site would be primarily influenced by traffic from State Route 34. Future noise levels affecting the compatibility of the project site were estimated using the FHWA's Traffic Noise Model (TNM) traffic noise-reference levels and SoundPLAN. Traffic noise-model inputs to SoundPLAN include the three- dimensional coordinates of the roadways, noise receivers, and topographic features or planned barriers that would affect noise propagation; vehicle volumes and speeds, by type of vehicle; and absorption factors.

Traffic volumes used for the noise analysis are shown in Table 4.5-4. The traffic counts used average daily trips (ADT) information provided in the project's Traffic Study (Associated Transportation Engineers 2020).

Table 4.5-4 Existing and Future Traffic Volumes

Roadway	Traffic Counts (Average Daily Trips)			
	Existing	Existing + Project	Cumulative	Cumulative + Project
State Route 34, south of Los Angeles Avenue	14,500	15,870	15,200	16,570
State Route 118, east of Somis Road	19,500	20,159	21,450	22,109
State Route 118, west of Somis Road	12,200	12,911	13,400	14,111
Balcom Canyon Road, north of Los Angeles Avenue	3,000	3,132	3,300	3,432
Broadway, west of Grimes Canyon Road	2,300	2,432	2,500	2,632
Central Avenue, west of U.S. Highway 101	17,000	17,132	18,700	18,832
Grimes Canyon Road, north of Los Angeles Avenue	3,500	3,895	3,900	4,295
Las Posas Road, south of Pleasant Valley Road	10,100	10,232	11,100	11,232
Lewis Road, south of Pleasant Valley Road	19,700	19,832	21,700	21,832
Pleasant Valley Road, west of Las Posas Road	16,200	16,332	17,800	17,932
Rose Avenue, south of Los Angeles Avenue	9,100	9,232	10,000	10,132

Source: Associated Transportation Engineers 2020

To determine the vehicle classification mix for modeling, the vehicle mix from Caltrans traffic counts were used, which observed 86 percent automobiles, 5 percent medium trucks (2-axle), and 9 percent heavy trucks (3-axle+) (Caltrans 2019). Peak hour traffic was assumed to be approximately 10 percent of the roadway's total ADT in the model as 10 percent peak hour traffic noise level is considered equivalent to CNEL.

Exterior traffic noise levels at the residential building facades of potential first, second, and third floors were calculated, with the first-floor receivers placed at 5 feet above ground level and second floor and third floor receivers placed at approximately 15 feet and 25 feet above ground level, respectively.

Significance Thresholds

Per the Initial Study Assessment Guidelines (County 2011), impacts related to noise and vibration would be potentially significant if the proposed project would:

1. Either individually or when combined with other recently approved, pending, and probable future projects, produce noise in excess of the standards for noise in the Ventura County General Plan Goals, Policies, and Programs (Section 2.16 of the Ventura County General Plan);
2. Either individually or when combined with other recently approved, pending, and probable future projects, include construction activities, involving blasting, pile-driving, vibratory

compaction, demolition, and drilling or excavation which exceed the threshold criteria provided in the Transit Noise and Vibration Impact Assessment;

3. Result in a transit use located within any of the critical distances of the vibration-sensitive uses listed in Table 1, *Screening Distances for Vibration Assessment*, in Section 21 of the Initial Study Assessment Guidelines;
4. Generate new heavy vehicle (e.g., semi-truck or bus) trips on uneven roadways located within proximity to sensitive uses that have the potential to either individually or when combined with other recently approved, pending, and probable future projects, exceed the threshold criteria of the Transit Use Thresholds for rubber-tire heavy vehicle uses (Table 1, *Screening Distances for Vibration Assessment*, in Section 21 of the Initial Study Assessment Guidelines);
5. Involve blasting, pile-driving, vibratory compaction, demolition, drilling, excavation, or other similar types of vibration-generating activities which have the potential to either individually or when combined with other recently approved, pending, and probable future projects, exceed the threshold criteria provided in the Section 12.2 of the Transit Noise and Vibration Impact Assessment (Hanson et al. 2006); and/or
6. Be inconsistent with the applicable General Plan Goals and Policies for "Noise and Vibration" of the County's Initial Study Assessment Guidelines.

Any project that produces noise in excess of the standards for noise in the Ventura County General Plan Goals, Policies, and Programs has the potential to cause a significant noise impact. Specifically, noise associated with the project would potentially significant if it would exceed the following criteria:

Construction

Per Policy 2 in Section 2.16.2 of the County General Plan, the Noise policies do not apply to noise generated during the construction phase of a project. The County's Noise Ordinance (Ordinance 4124) is intended to protect residential communities from loud or raucous nighttime noise. No person shall create within any residential zone of the County any loud or raucous noise that is audible to the human ear during the hours of 9:00 p.m. to 7:00 a.m. of the following day, at a distance of 50 feet from the property line of the noise source or 50 feet from any such noise source if the noise source is in a public right-of-way.

Permanent

Non-construction-related noise significance thresholds are presented in Section 2.16.2 of the County General Plan (County 2019), Transit Noise and Vibration Impact Assessment (Hanson et al. 2006), Initial Study Assessment Guidelines (County 2011). Operational noise would be significant if the noise levels exceed:

- 55 dBA L_{eq} (1H) or ambient noise level plus 3 dBA, whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.
- 50 dBA L_{eq} (1H) or ambient noise level plus 3 dBA, whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.
- 45 dBA L_{eq} (1H) or ambient noise level plus 3 dBA, whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m.

For project residences, indoor noise levels in habitable rooms would be significant if they exceed 45 CNEL and outdoor noise levels at the exterior use areas would be significant if they exceed 60 CNEL or of 65 dBA L_{eq} (1H).

For traffic-related noise, impacts would be considered significant if project-generated traffic would result in exposure of sensitive receptors to an unacceptable increase in noise levels. For purposes of this analysis, a significant impact would occur if project-related traffic increases the ambient noise environment of noise-sensitive locations by 3 dBA or more if the locations are subject to noise levels in excess of 60 CNEL for exterior areas or 45 CNEL for interior noise levels, or by 5 dBA or more if the locations are not subject to noise levels in excess of the aforementioned standards.

Any project that either individually or when combined with other recently approved, pending, and probable future projects, includes construction activities involving blasting, pile-driving, vibratory compaction, demolition, and drilling or excavation which exceed the threshold criteria provided in Table 4.5-2 is considered to have a potentially significant impact.

4.5.2.2 Project Impacts and Mitigation Measures

Threshold 1:	Would the project, either individually or when combined with other recently approved, pending, and probable future projects, produce noise in excess of the standards for noise in the Ventura County General Plan Goals, Policies, and Programs?
Threshold 2:	Would the project, either individually or when combined with other recently approved, pending, and probable future projects, include construction activities, involving blasting, pile-driving, vibratory compaction, demolition, and drilling or excavation which exceed the threshold criteria provided in the Transit Noise and Vibration Impact Assessment?

IMPACT N-1 CONSTRUCTION NOISE AND STATIONARY NOISE AND OFF-SITE TRAFFIC NOISE FROM OPERATION OF THE PROJECT WOULD NOT EXCEED VENTURA COUNTY STANDARDS AT THE NEARBY NOISE-SENSITIVE RECEPTORS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

The Ventura County Construction Noise Threshold and Control Plan defines noise-sensitive receivers according to their typical sensitive time period. Residential uses are considered sensitive during the evening and nighttime hours (7:00 p.m. to 7:00 a.m.), while schools, churches, and libraries are considered sensitive during the daytime hours when in use (7:00 a.m. to 7:00 p.m.). Project construction would only occur during the daytime hours; therefore, no noise-sensitive residences would be exposed to construction noise. Over the course of a typical construction day, construction equipment would be located as close as 350 feet to the nearest daytime noise-sensitive receiver structure at the Rancho Campana High School to the west. Construction equipment would be located as close as 500 feet and 950 feet to the Church of Jesus Christ of Latter-day Saints to the south and to the Camarillo Public Library to the southwest, respectively. In addition, construction of the eastern driveway would occur as close as 400 feet from the single-family residences to the south.

As required by Section 2.16.2 of the County General Plan (County 2019), the County's Noise Ordinance (Ordinance 4124), and the County's Transit Noise and Vibration Impact Assessment Guidelines (Hanson et al. 2006), project construction would be limited to the daytime hours of 7:00

a.m. to 7:00 p.m. to ensure that noise impacts at nearby noise-sensitive receptors during project construction would be less than significant.

Operation

The proposed residences would be a new source of noise sources that may be audible at nearby properties, which include single-family residences, Rancho Campana High School, and the Church of Jesus Christ of Latter-day Saints. These receivers may periodically be subject to noise from stationary noise from HVAC, the emergency generator and blower of the lift station, and increased traffic noise from project vehicles. Noise levels at adjacent properties are shown in Table 4.5-5 and displayed in Figure 4.5-1 as receivers OFF1 through OFF4. As shown in Table 4.5-5, noise levels would not exceed County noise limits from stationary sources. Operational noise contours are also shown in Figure 4.5-1. Noise levels from project operation would result in less than significant impacts.

Table 4.5-5 Operational Noise Levels at Off-site Receivers

		dBA L_{eq} (1H)			
Receiver	**Description**	**HVAC**	**Lift Station**	**Combined**	**Exceed Threshold?[1]**
OFF1	Single-family Residence	20	32	33	No
OFF2	High School	31	26	32	No
OFF3	Church	27	22	28	No
OFF4	Single-family Residence	27	11	27	No

[1] The applicable noise threshold is: L_{eq}[1H] of 55 dBA or ambient noise level plus 3 dBA, whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.; L_{eq}[1H] of 50 dBA or ambient noise level plus 3 dBA, whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.; and L_{eq}[1H] of 45 dBA or ambient noise level plus 3 dBA, whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m.

Figure 4.5-1 Off-site Receivers and Operational Noise Contours

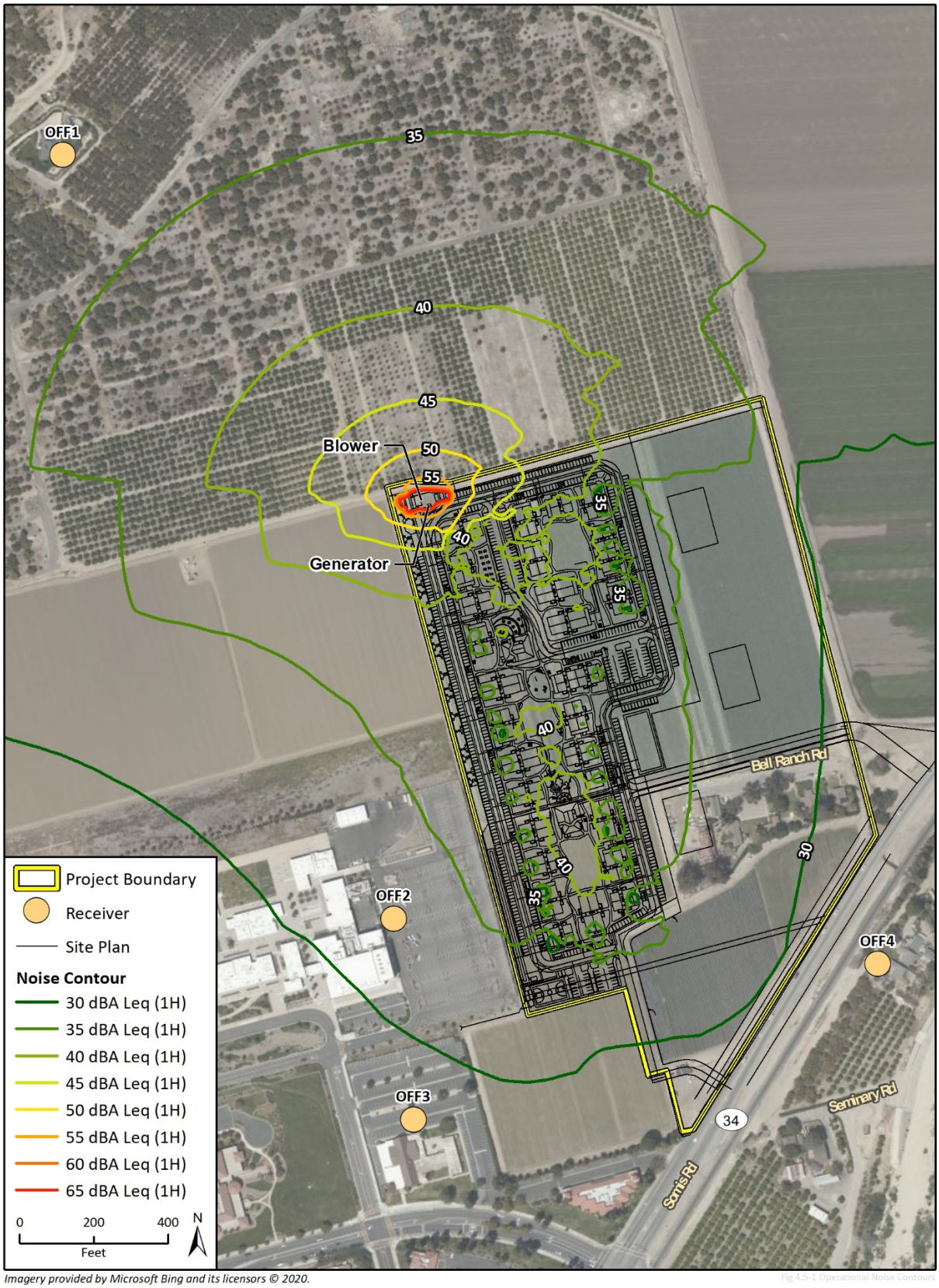

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Fig 4.5-1 Operational Noise Contours

Off-site Traffic Noise

The project would generate new vehicle trips that would increase noise levels on nearby roadways. These trips would occur primarily on Scott Road. Project-generated traffic noise increases are shown in Table 4.5-6. As shown in the tables, traffic noise increases would reach as high as approximately 1 dBA, which would not exceed the 3 dBA criteria for off-site traffic noise impacts. Impacts would be less than significant.

Table 4.5-6 Off-site Traffic Noise Increases

	Noise Increase (dBA L_{eq})					
Roadway/Segment	Existing	Existing + Project	Increase	Cumulative	Cumulative + Project	Increase
State Route 34, south of Los Angeles Avenue	70	71	1	70	71	1
State Route 118, east of Somis Road	73	73	<1	74	74	<1
State Route 118, west of Somis Road	71	71	<1	72	72	<1
Balcom Canyon Road, north of Los Angeles Avenue	64	65	1	65	65	<1
Broadway, west of Grimes Canyon Road	63	64	1	64	64	<1
Central Avenue, west of U.S. Highway 101	71	71	<1	72	72	<1
Grimes Canyon Road, north of Los Angeles Avenue	66	66	<1	66	67	1
Las Posas Road, south of Pleasant Valley Road	71	71	<1	72	72	<1
Lewis Road, south of Pleasant Valley Road	73	73	<1	74	74	<1
Pleasant Valley Road, west of Las Posas Road	73	73	<1	74	74	<1
Rose Avenue, south of Los Angeles Avenue	71	71	<1	71	71	<1

Land Use Compatibility

Following the methodology and reference noise levels discussed under Methodology, noise levels at the project's apartments and outdoor areas were modeled. Building façade noise levels were modeled at ground-level and at the potential 2nd and 3rd floors of the residences, as shown in Table 4.5-7 as Receivers ON1 through ON26, and shared exterior use areas are shown as ON27 through ON31. Receiver locations and roadway noise contours are shown on Figure 4.5-2. As shown in Table 4.5-7, exterior noise levels from traffic noise at the potential outdoor areas of each residence and the project's shared outdoor areas would not exceed 60 CNEL. Therefore, noise levels at exterior areas of project residences would not exceed the County's 60 CNEL exterior noise standard for residences and would not conflict with the County General Plan.

Standard construction techniques for wood-frame construction buildings required under the California Building Code typically achieve a minimum 25-dBA reduction from exterior sources at

interior locations when the windows are in a closed position. Therefore, if building façade noise levels exceeded 70 CNEL for the residences, interior noise levels for the project would potentially exceed the County's interior noise standard of 45 CNEL.

As shown in Table 4.5-7, building façade noise levels do not exceed 70 CNEL at the proposed residences. Therefore, interior noise levels would not exceed 45 CNEL, and the project would be consistent with the interior noise level standards of the County General Plan.

Figure 4.5-2 On-site Receivers and Roadway Noise Contours

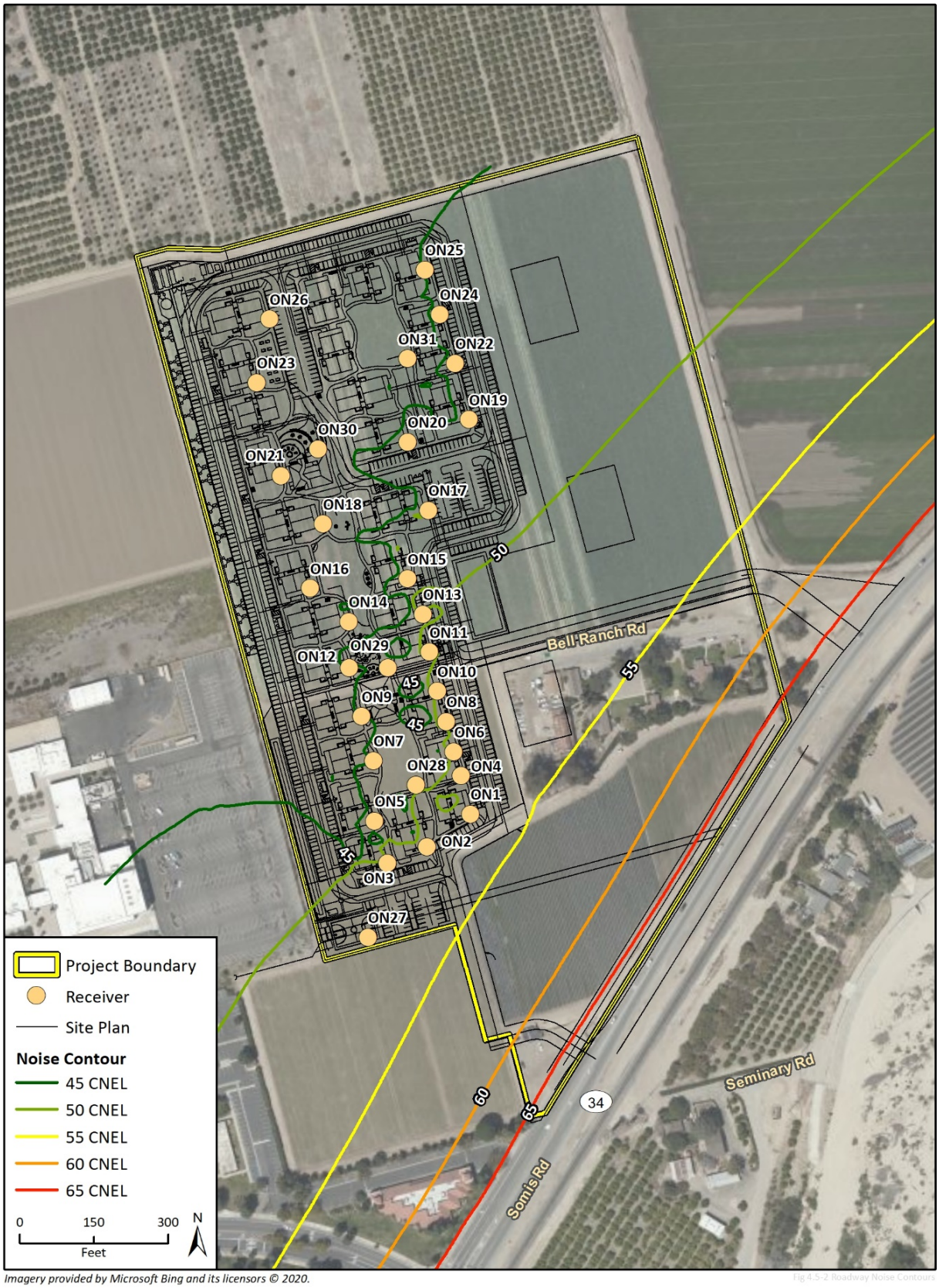

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Fig 4.5-2 Roadway Noise Contours

Table 4.5-7 Traffic Noise Levels

Receiver	Description	Noise Level (CNEL)			Exceed Exterior Threshold?[1]	Exceed Interior Threshold?[1,2]
		Ground Level/ 1st Floor	2nd Floor	3rd Floor		
ON1	Project Residence	55	58	60	No	No
ON2	Project Residence	54	57	59	No	No
ON3	Project Residence	52	56	58	No	No
ON4	Project Residence	52	56	58	No	No
ON5	Project Residence	47	50	52	No	No
ON6	Project Residence	53	56	58	No	No
ON7	Project Residence	47	51	53	No	No
ON8	Project Residence	52	55	57	No	No
ON9	Project Residence	45	48	50	No	No
ON10	Project Residence	51	55	57	No	No
ON11	Project Residence	50	54	56	No	No
ON12	Project Residence	45	47	50	No	No
ON13	Project Residence	50	53	55	No	No
ON14	Project Residence	44	46	48	No	No
ON15	Project Residence	49	52	55	No	No
ON16	Project Residence	43	45	47	No	No
ON17	Project Residence	49	52	54	No	No
ON18	Project Residence	44	46	48	No	No
ON19	Project Residence	48	51	53	No	No
ON20	Project Residence	47	50	52	No	No
ON21	Project Residence	43	45	47	No	No
ON22	Project Residence	47	50	52	No	No
ON23	Project Residence	38	39	40	No	No
ON24	Project Residence	47	50	51	No	No
ON25	Project Residence	46	49	51	No	No
ON26	Project Residence	38	37	39	No	No
ON27	Exterior Use Area	53	N/A	N/A	No	N/A
ON28	Exterior Use Area	48	N/A	N/A	No	N/A
ON29	Exterior Use Area	46	N/A	N/A	No	N/A
ON30	Exterior Use Area	43	N/A	N/A	No	N/A
ON31	Exterior Use Area	43	N/A	N/A	No	N/A

[1] The Ventura County General Plan states the following limits for new noise sensitive land uses: Indoor noise levels in habitable rooms shall not exceed 45 CNEL; outdoor noise levels shall not exceed 60 CNEL.

[2] Standard construction techniques for wood-frame construction buildings required under the California Building Code typically achieve a minimum 25-dBA reduction from exterior sources at interior locations when the windows are in a closed position; therefore, a 25 dBA reduction was assumed for noise levels to compare to the interior noise standard of 45 CNEL.

Mitigation Measures

No mitigation is required.

Threshold 3:	Would the project result in a transit use located within any of the critical distances of the vibration-sensitive uses listed in Table 1, *Screening Distances for Vibration Assessment*, in Section 21 of the Initial Study Assessment Guidelines?
Threshold 4:	Would the project generate new heavy vehicle (e.g., semi-truck or bus) trips on uneven roadways located within proximity to sensitive uses that have the potential to either individually or when combined with other recently approved, pending, and probable future projects, exceed the threshold criteria of the Transit Use Thresholds for rubber-tire heavy vehicle uses (Table 1, Screening Distances for Vibration Assessment, in Section 21 of the Initial Study Assessment Guidelines)?
Threshold 5:	Would the project involve blasting, pile-driving, vibratory compaction, demolition, drilling, excavation, or other similar types of vibration-generating activities which have the potential to either individually or when combined with other recently approved, pending, and probable future projects, exceed the threshold criteria provided in the Section 12.2 of the Transit Noise and Vibration Impact Assessment (Hanson et al. 2006)?

IMPACT N-2 PROJECT-RELATED VIBRATION WOULD NOT RESULT IN EXCESSIVE GROUND-BORNE VIBRATION OR NOISE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction activities known to generate excessive ground-borne vibration, such as pile driving, would not be conducted by the project. The greatest anticipated source of vibration during general project construction activities would be from a dozer, which may be used within 350 feet of the nearest off-site structures (Rancho Campana High School) to when accounting for setbacks. A dozer would create approximately 0.089 in/sec PPV at a distance of 25 feet (Caltrans 2020). This would equal a vibration level of 0.0049 in/sec PPV at a distance of 350 feet.[5] This would be lower than is the strictest FTA construction vibration damage criterion of 0.12 in/sec PPV for buildings extremely susceptible to vibration damage. Therefore, temporary impacts associated with the dozer (and other potential equipment) would be less than significant.

Operation of the project would not include any substantial vibration sources. Therefore, operational vibration impacts would be less than significant.

Mitigation Measures

No mitigation is required.

[5] $PPV_{Equipment} = PPV_{Ref}(25/D)^n$ (in/sec), PPV_{Ref} = reference PPV at 25 feet, D = distance ,and n = 1.1

Threshold 6:	Would the project be inconsistent with the applicable General Plan Goals and Policies for "Noise and Vibration" of the County's Initial Study Assessment Guidelines?

IMPACT N-3 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would be consistent with the County General Plan goals and policies listed previously under Regulatory Setting The project's consistency is analyzed in detail in Section 4.10, *Land Use and Planning*. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.5.2.3 Cumulative Impacts

Construction noise and vibration are localized and rapidly attenuate within an urban environment. Although some of the cumulative projects listed in Table 3-1 may be under construction at the same time as the proposed project, these projects are not located in close enough proximity to the project site such that noise and vibration from construction activities would impact the same sensitive receivers and structures. Therefore, no cumulative construction noise and vibration impacts would occur.

Some of the cumulative projects listed in Table 3-1 would include similar operational noise sources as the proposed project (e.g., parking activities, HVAC equipment, and outdoor use areas). Similar to construction noise and vibration, operational noise from these sources is localized and rapidly attenuates within an urbanized setting due to the effects of intervening structures and topography that block the line of sight and other noise sources closer to receivers that obscure project-related noise. Given the distance of the cumulative projects from the project site, these projects are not located in close enough proximity to the project site such that operational noise would impact the same sensitive receivers. Therefore, no cumulative operational noise impacts would occur.

4.6 Public Health

This section analyzes the potential for the proposed project to cause significant impacts to human health related issues such as, but not limited to, vectors, bioaerosols, and other pathogens or environmental factors that may pose a substantial present or potential hazard to public health. The primary human health issues of the project would be related to the community wastewater treatment facility (CWWTF) from on-site treatment and storage of project wastewater, recycled water, and activated sludge. This section also addresses long-term regulatory requirements associated with the distribution and storage of Title 22 Recycled Water and the disposal of activated sludge. This section relies in part on information from the Preliminary On-Site Wastewater Treatment System Design Report by WREA (Appendix B) and the Seepage Pit Performance Test prepared by Earth Systems Pacific (Appendix G). Impacts related to biosolids generated at the CWWTF are discussed in Section 4.8, *Waste Treatment and Disposal Facilities – Solid Waste Facilities.*

4.6.1 Setting

4.6.1.1 Onsite Wastewater Treatment Systems

The proposed CWWTF is classified as an Onsite Wastewater Treatment System (OWTS), or an "alternate private sewage disposal system" as defined by the County's Building Code, Article 6, Amendments to the California Plumbing Code.

"Recycled water" refers to water which, as a result of treatment of waste, is suitable for a direct beneficial use or a controlled use that would not otherwise occur and is therefore considered a valuable resource (State Water Resources Control Board [SWRCB] 2018). Uniform Statewide Recycling Criteria (California Code of Regulations [CCR], Title 22, Division 4, Chapter 3) contains requirements for recycled water quality and wastewater treatment requirements for the various types of allowed uses.

The allowable use of recycled water is based on the level of recycled water treatment. "Non-potable recycled water" refers to recycled water that is treated for non-potable use pursuant to the uniform statewide recycling criteria in CCR Title 22. Non-potable recycled water uses include, but are not limited to, irrigation, industrial or commercial cooling, supply for recreational impoundment, toilet flushing, and dust control. For non-potable reuse applications, there are four types of recycled water based on levels of treatment: non-disinfected secondary, disinfected secondary, and disinfected tertiary. Non-disinfected secondary recycled water is water with the lowest level of treatment, whereas disinfected tertiary recycled water goes through higher levels of treatment, sufficient for applications with more public exposure (SWRCB 2018).

The CWWTF product water would be classified as "disinfected tertiary recycled water" meeting Los Angeles Regional Water Quality Control Board (RWQCB) water quality waste discharge requirements (WDR) and water reclamation requirements (WRR).

"Activated sludge treatment" refers to a wastewater treatment process in which predominantly biodegradable pollutants in wastewater are absorbed by a suspended mass of living aerobic organisms called "activated sludge," according to CCR Title 23, Division 3, Chapter 26.

"Seepage pits" are underground drilled pits filled with drain rock, through which wastewater effluent is distributed via a central perforated pipe extending the full depth of the pit (Ventura

County 2020). Effluent seeps through the bottom and sides of the pit into the surrounding soil. Seepage pits are used when soil conditions near the ground surface are unsatisfactory for leach fields (Ventura County 2020). Typically, seepage pits are used with septic tank systems, which provide a moderate level of wastewater treatment via settling and anaerobic processes before discharging effluent to the pits.

4.6.1.2 Recycled Water Use

Recycled water is used for agricultural irrigation applications throughout California. Beginning with the first use of recycled water for landscape irrigation about 100 years ago, agencies across California have continued to innovate and improve the process to treat and beneficially reuse their wastewater (WateReuse 2019). The SWRCB establishes general policies governing the permitting of recycled water projects, develops uniform water recycling criteria appropriate to particular uses of water, reviews and approves Title 22 engineering reports for recycled water use, and allocates and disperses funding for recycled water projects consistent with its roles of protecting water quality, public health, and sustaining water supplies. When used in compliance with the Water Quality Control Policy for Recycled Water (Recycled Water Policy), Title 22, and other applicable state and federal water quality laws, the SWRCB "finds that recycled water is safe for approved uses, and strongly supports recycled water as a safe alternative to fresh water or potable water for such approved uses" (SWRCB 2018).

4.6.1.3 Vectors

A "vector" is any insect, arthropod, rodent, or other animal of public health significance that can cause human discomfort or injury, or is capable of harboring or transmitting disease. Disease causing microorganisms can be carried by a vector, such as a flea, tick, or mosquito, that transfers the disease agent from its source in nature to a human host. In Ventura County, the most substantial vector populations include mosquitoes and rodents. Vector sources occur where site conditions provide habitat suitable for breeding. Within a new development, such as the proposed housing complex, ponding of water and other water storage features could result in aquatic habitat suitable for mosquitoes and other vector species.

4.6.1.4 Regulatory Setting

State Regulations

Water Quality Control Policy for Recycled Water (Recycled Water Policy)

The Recycled Water Policy (SWRCB 2018) outlines policies for safe use of recycled water. The Policy requires annual reporting of recycled water projection and reuse to the SWRCB, including annual volume of treated wastewater distributed for beneficial use (e.g., agricultural irrigation). The Recycled Water Policy identifies three goals:

- **Goal 3.1.1.** Increase the use of recycled water from 714,000 acre-feet per year (AFY) in 2015 to 1.5 million AFY by 2020 and to 2.5 million AFY by 2030.
- **Goal 3.1.2.** Reuse all dry weather direct discharges of treated wastewater to enclosed bays, estuaries and coastal lagoons, and ocean waters that can be viably put to a beneficial use. For the purpose of this goal, treated wastewater does not include discharges necessary to maintain beneficial uses and brine discharges from recycled water facilities or desalination facilities.

- **Goal 3.1.3.** Maximize the use of recycled water in areas where groundwater supplies are in a state of overdraft, to the extent that downstream water rights, instream flow requirements, and public trust resources are protected.

California Code of Regulations Water Recycling Criteria (Uniform Statewide Recycling Criteria)

Title 22 of the CCR, Division 4, *Environmental Health*, Chapters 1 through 3 outline California's health requirements related to recycled water. The intent of Title 22 is to ensure protection of public health associated with the use of recycled water. The regulations establish acceptable levels of constituents in recycled water for a range of uses and assurance of reliability in the production of recycled water. The SWRCB governs the permitting of recycled water projects, develops uniform water recycling criteria, and reviews and approves Title 22 engineering reports for recycled water use.

Title 22 lists 40 specific uses allowed with disinfected tertiary recycled water (such as irrigating parks), 24 specific uses allowed with disinfected secondary recycled water (such as irrigating animal feed and other unprocessed crops), and seven specific uses allowed with undisinfected secondary recycled water (such industrial uses). Irrigation of food crops is an allowed use of disinfected recycled water under Title 22.

See Section 4.9, *Water Resources – Surface Water Quality*, of this EIR for requirements related to the discharge of water pursuant to the Porter-Cologne Water Quality Control Act (California Water Code, Division 7, Section 13000 et seq.).

California Building Code

The California Building Code (CBC), which is codified in Title 24 of the CCR Part 2, was promulgated to safeguard the public health, safety, and general welfare by establishing minimum standards related to structural strength, egress facilities, and general building stability. The purpose of the CBC is to regulate and control the design, construction, quality of materials, use/occupancy, location, and maintenance of all building and structures within its jurisdiction. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. It includes voluntary tiers to encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design. The provisions of the CBC apply to the construction, alteration, movement, replacement, and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout California.

California Health and Safety Code, Vector Control

Sections 116110 through 116112 of the California Health and Safety Code establishes mosquito abatement and vector control districts, which are charged to protect California residents and their communities against the threats of vector-borne diseases.

Local Regulations

Ventura County General Plan

The following Ventura County General Plan goals and policies are related to public health.

- **Goals**
  - **4.4.1-1.** Ensure the provision of adequate individual and public sewage/waste collection, treatment, and disposal facilities to meet the County's current and future needs in a manner which will protect the natural environment and ensure protection of the public's health, safety, and welfare.
- **Policies**
  - **4.4.2-1.** Community sewage treatment facilities and solid waste disposal sites shall be deemed consistent with the General Plan only if they are designated on the Public Facilities Map. On-site septic systems (i.e., individual sewage disposal systems), on-site wastewater treatment facilities, waste transfer stations, off-site waste treatment facilities, and on-site storage facilities are consistent with the General Plan if they conform to the goals, policies, and programs of the General Plan.
  - **4.4.2-2.** Any subdivision, or discretionary change in land use having a direct effect upon the volume of sewage, shall be required to connect to a public sewer system. Exceptions to this policy to allow the use of septic systems may be granted in accordance with County Sewer Policy. Installation and maintenance of septic systems shall be regulated by the County Environmental Health Division in accordance with the County's Sewer Policy, County Building Code, and County Service Area 32.
  - **4.4.2-3.** In order to reduce the need for additional wastewater treatment capacity, the County shall require new discretionary development to utilize water-conserving design features.
  - **4.4.2-5.** Waste treatment and disposal operations shall be designed and conducted in a manner that is compatible with surrounding land uses such that the potential impacts are mitigated to less than significant levels, or, where no feasible mitigation measures are available, a statement of overriding considerations consistent with CEQA shall be adopted. At the end of such operations, the site shall be restored to a use compatible with surrounding land uses.

Vector Control Program

The Vector Control Program within the County's Environmental Health Division is responsible for performing mosquito monitoring and control activities at more than 2,000 potential mosquito breeding sources to prevent and minimize the exposure of the public to mosquito-borne diseases, such as West Nile Virus, other types of encephalitis, and malaria. The Vector Control Program also monitors unincorporated county areas for plague, lyme disease, and hantavirus to prevent and minimize exposure of the public to such diseases.

4.6.2 Impact Analysis

4.6.2.1 Significance Thresholds

Per the Initial Study Assessment Guidelines (County 2011), impacts related to public health would be potentially significant if the proposed project would:

1. Result in impacts to public health from environmental factors as set forth in the "Public Health" section of the County's Initial Study Assessment Guidelines.

2. Be inconsistent with the applicable General Plan Goals and Policies for "Public Health" in the County's Initial Study Assessment Guidelines.

The County's Initial Study Assessment Guidelines require an assessment to determine whether the project is in compliance with applicable state regulations related to human health, the Ventura County Building Code, and other applicable guidelines and policies.

Additionally, projects proposing to utilize groundwater in any capacity are required by the County to test the groundwater for perchlorate and trichloroethylene (TCE). The County also requires testing of the soil for perchlorate and TCE for projects that would result in an increase in density to determine the degree of potential threat of off-site contamination of soil.

A determination of a less than significant impact to public health can be made if the project is in compliance with applicable state regulations.

The project site is not located within two miles of a former and/or current rocket engine testing facility and, therefore, is not required to comply with additional requirements included in the Initial Study Assessment Guidelines specific to projects within two miles of a rocket engine testing facility.

4.6.2.2 Project Impacts and Mitigation Measures

Threshold 1:	Would the project result in impacts to public health from environmental factors as set forth in the "Public Health" section of the County's Initial Study Assessment Guidelines?

IMPACT PH-1 OPERATION OF THE CWWTF WOULD REQUIRE ROUTINE TRANSPORT, STORAGE, USE, AND DISPOSAL OF HAZARDOUS MATERIALS FOR PURPOSES OF TREATMENT OF WASTEWATER AND SOLIDS. FACILITY OPERATION WOULD BE SUBJECT TO EXISTING AND FUTURE FEDERAL, STATE, AND LOCAL HEALTH AND SAFETY REQUIREMENTS, INCLUDING THOSE ESTABLISHED FOR THE HANDLING, STORAGE, TRANSPORTATION, AND DISPOSAL OF HAZARDOUS MATERIALS. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

An OWTS that is undersized, improperly installed, failing, or poorly maintained has the potential to create a public nuisance and/or contaminate groundwater. Wastewater from an OWTS can contain contaminants such as nitrates, bacteria, chemicals, and viruses. If an OWTS is designed incorrectly or is not constructed in conformance with applicable building codes and construction practices, contaminants can enter the groundwater supply or streams and may result in the ponding of sewage aboveground, causing direct exposure to people and animals.

The Ventura Regional Sanitation District would operate and maintain the CWWTF on the project site in compliance with mandatory laws and regulations. As discussed below, with adherence to state and local OWTS regulations and proper maintenance of tanks and seepage pits, the proposed project would not result in significant public health impacts from environmental factors as set forth in the "Public Health" section of the County's Initial Study Assessment Guidelines.

Operation of the CWWTF would require routine transport, storage, use, and disposal of hazardous materials (e.g., chlorine, sodium hypochlorite, hydrogen peroxide) for purposes of treatment of wastewater. Treatment materials would be transported to the project site via truck. Truck deliveries would access the CWWTF site via the two access connections to Somis Road, as shown in Figure 2-3b in Section 2, *Project Description*. Chemical supplies not actively in use in CWWTF treatment equipment may be stored in the maintenance storage shed at the CWWTF. The maintenance storage shed is a secure location, located inside the locked gate around the facility.

Facility operation would be subject to existing and future federal, state, and local health and safety requirements for the handling, storage, transportation, and disposal of hazardous materials, including requirements found in the following regulations and guidelines:

- Ventura County OWTS Technical Manual
- Ventura County Building Code
- California Plumbing Code
- State Water Resources Control Board Order No. R4-2019-0024 – General Waste Discharge Requirements for Advanced Onsite Wastewater Treatment Systems
- State Water Resources Control Board Order WQ 2016-0068-DDW – Water Reclamation Requirements for Recycled Water Use

Regulatory compliance would ensure that chemicals are properly stored and handled to minimize spills and protect public health such that impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 1:	Would the project result in impacts to public health from environmental factors as set forth in the "Public Health" section of the County's Initial Study Assessment Guidelines?

IMPACT PH-2 THE CWWTF WOULD TREAT WASTEWATER TO TERTIARY TREATMENT STANDARDS AND PRODUCE RECYCLED WATER FOR AGRICULTURAL IRRIGATION. EXCESS RECYCLED WATER AND TREATED WASTEWATER EFFLUENT FROM THE CWWTF NOT MEETING RECYCLED WATER QUALITY STANDARDS WOULD BE DISPERSED THROUGH A SERIES OF UNDERGROUND SEEPAGE PITS. REGULATORY COMPLIANCE WOULD MINIMIZE PUBLIC HEALTH RISKS ASSOCIATED WITH RECYCLED WATER USE AND EFFLUENT DISPERSAL. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Recycled Water Agricultural Irrigation

As described in Section 2, *Project Description*, the recycled water produced at the CWWTF would be used to provide agricultural irrigation to approximately 70 acres of off-site orchards located adjacent to the project site.

Surface water quality issues are analyzed in detail in Section 4.9, *Water Resources – Surface Water Quality*. As discussed therein, the project applicant would be required to submit a Title 22 Report for "Production, Distribution, and Use of Recycled Water" to the State Water Resources Control Board for review and approval. The County's Building and Safety Division also has approval authority over the CWWTF. The Los Angeles Regional Quality Control Board would regulate the operation of the facility. As required by water discharge requirements and water reclamation requirements, constituents (pollutants) in the recycled water would be tested daily, weekly, and/or monthly.

The recycled water used for agricultural irrigation would be subject to compliance with CCR Title 22, Division 4, *Environmental Health*, Chapter 3, which includes water recycling criteria for the treatment of recycled water used for surface irrigation and includes separate treatment standards depending on whether recycled water will come into contact with the edible portion of food crops eaten raw by humans. Per Section 60321, recycled water generated at the CWWTF would be sampled at least once daily for total coliform bacteria. In addition, recycled water would be

continuously sampled for turbidity using a continuous turbidity meter and recorder. Per Section 60310, no impoundment of disinfected tertiary recycled water shall occur within 100 feet of any domestic water supply well. Per Section 60335, alarm devices would be installed at the CWWTF to warn the facility operator of loss of power from the normal power supply or failure of various treatment processes.

The CWWTF would also comply with all applicable water reclamation requirements for recycled water use established by SWRCB Order WQ 2016-0068-DDW (Water Reclamation Requirements for Recycled Water Use). The Order prohibits recycled water from being applied for irrigation during periods when soils are saturated and restricts runoff of applied irrigation water in order to protect surface water quality and potable water systems.

Standards for non-potable reuse are designed to be protective of human and environmental health. When used in compliance with the Recycled Water Policy, the Uniform Statewide Recycling Criteria, and applicable water quality laws, the SWRCB finds that recycled water is safe for approved uses, including agricultural irrigation. Compliance with applicable regulations would protect public health. Therefore, impacts related to recycled water agricultural irrigation would be less than significant.

Effluent Dispersal

Excess recycled water and any treated wastewater effluent not meeting recycled water quality standards would be dispersed through a series of underground seepage pits on the west side of the project site. As previously described, seepage pits are underground, rock-filled pits that receive wastewater effluent and disperse it through the bottom and sides of the pit into the surrounding soil. Seepage pits are not open to the air.

According to seepage pit field tests performed and detailed in the Seepage Pit Performance Test Report (Appendix G), the minimum absorption rate of soils in the seepage pit area is 3.4 gallons of water per square foot per day (Earth Systems Pacific 2019). Based on the minimum absorption rate per performance testing, the project would require approximately 60 seepage pits for dispersal of excess recycled water under full buildout conditions. Seepage pits would be approximately five feet in diameter and 50 vertical feet, spread across a 21,600-square-foot effluent dispersal field on the west side of the project site (WREA 2019).

The seepage pits would be located entirely underground and, therefore, would not provide a vector-related public health hazard (e.g., mosquito breeding habitat).

Seepage pits are typically used for septic tank systems, which provide basic treatment for domestic wastewater flows. The project's CWWTF would provide a higher level of treatment than is typically offered by septic systems before discharging treated effluent to the seepage pits in the dispersal field. The CWWTF design, including seepage pit design, would be subject to review and approval from the County of Ventura Environmental Health Division and the CWWTF would be constructed in conformance with applicable building codes and construction practices. The Ventura County Building Code (2019) identifies minimum setbacks between seepage pits and buildings, property lines, surface waters, domestic water wells and pipelines, and property lines. The Code also contains seepage pit sizing requirements and requirements pertaining to rock and sand fill.

Public health impacts related to seepage pits would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 2:	Would the project be inconsistent with the applicable General Plan Goals and Policies for "Public Health" in the County's Initial Study Assessment Guidelines?

IMPACT PH-3 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The County's Initial Study Assessment Guidelines does not list any specific County General Plan goals or policies with which a project should be consistent. Nonetheless, the project would be consistent with the County General Plan goals and policies listed previously under Regulatory Setting. The project's consistency is analyzed in detail in Section 4.10, *Land Use and Planning*. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.6.2.3 Cumulative Impacts

The geographic scope for cumulative public health impacts is the Somis area. This geographic scope is appropriate for public health because public health impacts are localized and specific to the area in which public health hazards exist. Cumulative development within this geographic scope includes the cumulative projects summarized in Table 3-1.

Cumulative development would generally increase density in the Somis area. The project's CWWTF would be designed to accommodate the full buildout of the project's housing complex, and would not serve other existing or future development. Therefore, any public health risks associated with operation of the project would not increase with cumulative development, nor would it exacerbate public health risks associated with cumulative development. In addition, cumulative development would also be required to adhere to all applicable federal, state, and local regulations designed to protect public health.

Therefore, cumulative impacts would be less than significant. Consequently, the proposed project would not have a cumulatively considerable contribution to a significant cumulative impact related to public health.

4.7 Transportation

This section analyzes the potential for the proposed project to cause significant impacts to the existing transportation and circulation facilities in project area. The analysis in this section is based in part on a Traffic Study prepared for the project by Associated Transportation Engineers (ATE) on February 21, 2020. The full study is provided in Appendix H.

It is noted that this EIR does not include a discussion or analysis of traffic with regard to roadway segment or intersection level of service (LOS) as such is no longer a requirement under CEQA. However, LOS is discussed in detail in the Traffic Study (ATE 2020; Appendix F). LOS is also discussed in Section 4.10, *Land Use and Planning*, in terms of whether the proposed project complies with General Plan policies relating to LOS.

4.7.1 Setting

4.7.1.1 Roadway Network

The study-area circulation system is comprised of U.S. Highway 101, State Route 118, State Route 34, Las Posas Road-Upland Road, Flynn Road, Adolfo Road, Daily Drive, Ventura Boulevard, Balcom Canyon Road and Grimes Canyon Road which serve as the major arterials, and collector streets. The following text provides a brief discussion of the primary components of the study-area street network.

U.S. Highway 101, located south of the site, is a multi-lane freeway that serves as a major arterial for the City of Camarillo and is the principal inter-city route along this portion of the Pacific Coast. The segment of U.S. Highway 101 in the study-area is 6-lanes with auxiliary on-off ramp lanes. Primary access between the freeway and the project site is provided via the signalized hook ramps at Daily Drive and Ventura Boulevard.

State Route 118 (Los Angeles Avenue), located north of the project site, is a 2- to 6-lane highway that extends from the State Route 126 (Santa Paula Freeway) in the City of Ventura to State Route 210 (Foothill Freeway) east of the City of San Fernando. State Route 118 is signalized at Somis Road.

State Route 34 (Somis Road/Lewis Road) in the study-area is a 2-lane north-south primary arterial. State Route 34 connects Somis to the City of Camarillo and City of Oxnard. The State Route 118 (Los Angeles Avenue)/State Route 34 (Somis Road) intersection provides regional access to the project site.

Las Posas Road-Upland Road is a 4-lane secondary arterial roadway that extends south to Pleasant Valley Road. The roadway extends east from Ponderosa Drive to Lewis Road as Las Posas Road. The roadway continues east from Lewis Road to Santa Rosa Road as Upland Road. South of Ponderosa Road, Las Posas is primary arterial. Las Posas Road-Upland Road serves residential, and commercial land uses in the study-area. The intersections of Las Posas Road/Camino Alvarez, Las Posas Road-Upland Road/Lewis Road and Upland Road/Flynn Road are signalized.

Daily Drive, located south of the site, is a 2-lane east-west collector roadway that provides access to the commercial and residential area located along the northern frontage of U.S. Highway 101 between Las Posas Road and Lewis Road. The U.S. Highway 101northbound/Daily Drive ramp intersection and Daily Drive/Lewis Road intersections are controlled by traffic signals.

Ventura Boulevard, located south of the site, is a 2- to 4-lane east-west secondary roadway that extends from Lewis Road to Wood Road west of the Camarillo Town Center. Ventura Boulevard provides access to the commercial and residential area located along the southern frontage of U.S. Highway 101. The U.S. Highway 101 southbound/Ventura Boulevard ramp intersection and Ventura Boulevard/Lewis Road intersections are controlled by traffic signals.

Adolfo Road is a 4-lane secondary arterial roadway that extends east from Ponderosa Drive to its terminus at the Conejo Creek. Adolfo Road serves residential, commercial and industrial land uses in the study area. The Lewis Road/Adolfo Road intersection is signalized.

Santa Clara Avenue is a 2-lane secondary arterial roadway that extends south from State Route 118 to U.S. Highway 101. Santa Clara Avenue serves agricultural residential and industrial land uses in the study-area. The State Route 118/Santa Clara Avenue intersection is signalized.

Flynn Road is a 4-lane secondary arterial/industrial collector roadway that extends south from Upland Road to Mission Oaks Boulevard. Flynn Road serves residential, commercial and industrial land uses in the study area. The Upland Road/Flynn Road intersection is signalized.

Balcom Canyon Road is a 2-lane rural roadway that extends north from State Route to Bradley Road. Balcom Canyon Road serves agricultural and residential land uses in the study area. The State Route 118/Balcom Canyon Road intersection is signalized.

Grimes Canyon Road is a 2-lane rural roadway that extends north from State Route 118 to Broadway. Grimes Canyon Road serves agricultural and residential land uses in the study area. The State Route 118/Grimes Canyon Road intersection is signalized.

4.7.1.2 Regulatory Setting

State Regulations

Senate Bill 743 – Transportation Impacts

Adopted in 2013, Senate Bill (SB) 743 required the Governor's Office of Planning and Research (OPR) to develop new CEQA guidelines that address transportation impact metrics under CEQA. Section 15064.3 was added to the State CEQA Guidelines requiring transportation impact analysis be based on VMT, instead of a congestion metric (such as LOS) and stating that a project's effect on automobile delay shall not constitute a significant environmental impact, as previously required. In December 2018, OPR published a Technical Advisory on Evaluating Transportation Impacts, including guidance for VMT analysis (OPR 2018). The Office of Administrative Law approved the updated CEQA Guidelines and lead agencies were given until July 1, 2020 to implement the updated guidelines for VMT analysis.

Assembly Bill 1266 – Traffic Control Devices: Bicycles (2019)

Assembly Bill (AB) 1266 requires Caltrans to provide guidance on the ways in which to notify bicyclists that they are allowed to traverse straight through an intersection when a right-turn-only lane requires vehicles to turn. Caltrans will be required to develop standards on lane striping, regulatory signage, and pavement markings in these scenarios.

Local Regulations

Ventura County Non-Coastal Zoning Ordinance

SECTION 8108-4.8.1 – REDUCTIONS IN NUMBER OF MOTOR VEHICLE PARKING SPACES REQUIRED

Discusses an applicant's ability to reduce the minimum number of parking spaces required with a new development. This may be accomplished by an applicant funded parking study, a Transportation Demand Management Plan, the provision of affordable or senior housing, as well as other means. The applicant's ability to fund and prepare a Transportation Demand Management Plan to reduce vehicle trips to the land use could contribute to reduced VMT, encourage a shift to non-vehicular travel modes and support a more vibrant regional multimodal transportation network.

SEC. 8108-5 – MOTOR VEHICLE PARKING DESIGN STANDARDS; SEC. 8108-6 BICYCLE PARKING DESIGN STANDARDS; AND SEC. 8108-8 – LOADING AREAS

These sections establish design standards to guide the development of safe parking and loading access for all modes and users.

Sec. 8109-0.7 – Transportation Demand and Trip Reduction Measures

This section discusses the minimum requirements of the applicant prior to the approval of discretionary development as it relates to standards for transportation demand management and trip reduction measures. These standards provide an opportunity to reduce VMT and encourage mode shift to non-vehicular travel modes.

Article 6: Parking and Loading Requirements

Article 6 discusses the requirements for the amount, location, and design of parking and loading access for motor vehicles and bicycles. Requirements and standards within this section intends to promote a balanced, safe, and accessible, and environmentally sound multimodal transportation network.

Draft Ventura County 2040 General Plan

Circulation, Transportation, and Mobility Element

The following policies from the Draft Ventura County 2040 General Plan Circulation, Transportation, and Mobility Element are applicable to the proposed project.

- **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.
- **Policy CTM-1.2: Projects with Significant Transportation Impacts.** County General Plan land use designation changes, zone changes, and discretionary development that would cause an individual (i.e., project-specific) or cumulative significant transportation impact based on Vehicle

Miles Traveled (VMT) under the California Environmental Quality Act (CEQA) shall be prohibited unless:

1. There are no feasible mitigation measures available that would reduce the impact to a less than significant level; and
2. The County's decision-making body, after balancing, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of the project against its unavoidable transportation impact and any other environmental risks, determines that the benefits of the project outweigh the unavoidable adverse environmental impacts and adopt a statement of overriding considerations pursuant CEQA.

- **Policy CTM-1.3: County Level of Service (LOS) Standards.** The County shall maintain LOS standards for use as part of the County's transportation planning including the traffic impact mitigation fee program, and the County's review and consideration of proposed land use legislation and discretionary development. For purposes of County transportation planning and review and consideration of proposed land use legislation and discretionary development, the County shall use the following minimum acceptable Level of Service (LOS) for road segment and intersection design standards within the Regional Road Network and all other County-maintained roadways:
  a. LOS 'C' for all Federal functional classification of Minor Collector (MNC) and Local roadways (L); and
  b. LOS 'D' for all Federal functional classifications except MNC and L, and Federal and State highways in the unincorporated area, except as otherwise provided in subparagraph (c and d;
  c. LOS 'E' for State Route 33 between the northerly end of the Ojai Freeway and the city of Ojai, Santa Rosa Road, Moorpark Road north of Santa Rosa Road, State Route 34 north of the city of Camarillo, and State Route 118 between Santa Clara Avenue and the city of Moorpark;
  d. LOS 'F' for Wendy Drive between Borchard Drive to Lois Avenue; and
  e. The LOS prescribed by the applicable city for all federal highways, state highways, city thoroughfares and city-maintained local roads located within that city, if the city has formally adopted and is implementing a General Plan policy, ordinance, or a reciprocal agreement with the County regarding development in the city that is intended to improve the LOS of County-maintained local roads and federal and state highways located within the unincorporated area of the county.
  f. At any intersection between two or more roads, each of which has a prescribed minimum acceptable LOS, the lower LOS of the roads shall be the minimum acceptable LOS for that intersection.
- **Policy CTM-1.4: Level of Service (LOS) Evaluation.** County General Plan land use designation changes and zone changes shall be evaluated for their individual (i.e., project-specific) and cumulative effects, and discretionary developments shall be evaluated for their individual effects, on Level of Service (LOS) on existing and future roads, to determine whether the project:
  a. Would cause existing roads within the Regional Road Network or County-maintained roadways that are currently functioning at an acceptable LOS to function below an acceptable LOS;

b. Would add traffic to existing roads within the Regional Road Network or County-maintained roadways that are currently functioning below an acceptable LOS; and

c. Could cause future roads planned for addition to the Regional Road Network or County maintained roadways to function below an acceptable LOS.

d. The Level of Service (LOS) evaluation shall be conducted based on methods established by the County.

- **Policy CTM-1.5: Projects with Unacceptable Level of Service (LOS).**

1. County General Plan land use designation changes and zone changes that would cause any cumulative unacceptable LOS as determined pursuant to Policies CTM-1.3 and CTM-1.4 shall be prohibited unless the Board of Supervisors imposes all feasible conditions of approval to address all unacceptable LOS effects and, after balancing, as applicable, the project's economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, against the project's unacceptable LOS effects, determines that the benefits of the project outweigh the project's unacceptable LOS effects.
2. County General Plan land use designation changes, zone changes, and discretionary development that would individually (i.e., project-specific) cause an unacceptable LOS effect as determined pursuant to Policies CTM-1.3 and CTM-1.4 shall be prohibited unless the improvements to the roadway and intersections are included in the Public Works Agency, Transportation Department Strategic Master Plan with a funding mechanism identified and the project is conditioned on the payment of a fee proportional to the project's fair share of unacceptable LOS effects.
3. The following are exempt from this Policy:
    a. Farmworker Housing Complexes and other housing exclusively for lower-income households. Affordable housing developments, pursuant to Article 16 of the Non-Coastal Zoning Ordinance, where such developments are served by roads that are currently operating at LOS "E" or better;
    b. Additional dwellings and lots on Cultural Heritage Sites as permitted in the Non-Coastal Zoning Ordinance;
    c. Agriculture and Agricultural Operations as permitted in the Coastal and Non-Coastal Zoning Ordinances, where such developments are served by roads that are currently operating at LOS "E" or better;
    d. The unacceptable LOS exists on a City-maintained road or federal or state highway located within a city unless the applicable city has formally adopted and is implementing a general plan policy, ordinance, or a reciprocal traffic impact mitigation fee agreement with the County regarding development in the city that is intended to improve the LOS of County-maintained local roads and federal and state highways located within the unincorporated area of the county;
    e. Allow LOS "F" for Wendy Drive and maintain as two-lane road; and
    f. If the LOS effects of a County-approved Specific/Area Plan are determined acceptable pursuant to Policies CTM-1.3 and CTM-1.4, the LOS effects of any subsequent development that is consistent with the approved Specific/Area Plan shall be exempt from this Policy.

- **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.

- **Policy CTM-2.3: County Road Access.** The County shall require discretionary development with access onto a County road to have the access point(s) designed and built to County standards.
- **Policy CTM-2.18: Complete Streets Standards in Existing Communities.** The County shall require discretionary development in designated Existing Communities to construct roadways to urban standards and Complete Streets principles, including curb, gutter, sidewalks, and bike lanes when there is a nexus for improvement. The County shall rely on the guidelines and design standards for Complete Streets design established by the California Manual on Uniform Traffic Control Devices (CAMUTCD), Caltrans in the Highway Design Manual, and Complete Streets Guidelines (pursuant to Deputy Directive-64-R2), Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO).
- **Policy CTM-2.20: Safe Pedestrian Crossings.** The County shall improve pedestrian safety at intersections and mid-block locations in Existing Communities through approved features consistent with the California Manual on Uniform Traffic Control Devices (CAMUTCD), Highway Design Manual, Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO), and the National Cooperative Highway Research Program Report 498 (Application of Pedestrian Crossing Treatments for Streets and Highways).
- **Policy CTM-2.27: Discretionary Development and Conditions of Approval to Minimize Traffic Impacts.** The County shall require that discretionary development be subject to permit conditions of approval, where feasible, to minimize traffic impacts by incorporating pedestrian and bicycle pathways, bicycle racks and lockers, ridesharing programs, transit improvements (bus turnouts, shelters, benches), and/or transit subsidies for employees or residents of the proposed development.
- **Policy CTM-3.5: Bicycle Routes in Rural Areas.** The County shall plan for bicycle network connectivity in rural, agricultural, and open space areas in a way that supports and complements business and agricultural activities in those areas.
- **Policy CTM-3.10: Bicycle Storage Facilities.** The County shall require adequate bicycle storage facilities (e.g., bicycle racks, lockers) for discretionary development as determined by allowable land uses at a given site.
- **Policy CTM-6.3: Permeable Pavement.** As part of new roadway planning and design as part of discretionary development, the County shall promote the use of permeable paving and other passive drainage features such as bioswales to prevent flooding, particularly in urban areas.
- **Policy CTM-6.5: Electric Vehicle Charging Stations.** The County shall support the installation of electric vehicle charging stations, where feasible, at County facilities, parking lots, park-and-ride lots, truck stops, and new development.

4.7.2 Impact Analysis

4.7.2.1 Significance Thresholds

Methodology

Vehicle Miles Traveled

As implemented under Section 15064.3 of the CEQA Guidelines states that a project's effect on automobile delay shall not constitute a significant environmental impact, as previously required, and VMT is the required metric to be used for identifying CEQA impacts and mitigation, instead of a congestion metric (such as LOS). While some jurisdictions may choose to retain LOS standards as a project's condition of approval, CEQA impacts and/or mitigation measures are no longer based on changes to LOS.

VMT was chosen as the primary metric to better integrate land use and multimodal transportation choices, and to encourage alternative transportation, greater efficiency, and reduced GHG emissions. OPR's Technical Advisory on Evaluating Transportation Impacts provides technical recommendations regarding assessment of VMT, thresholds of significance and mitigation measures (OPR 2018). OPR offers a generalized recommendation of a 15 percent reduction below existing VMT as a threshold of CEQA significance. Trip- or tour-based VMT analysis is recommended over boundary-based VMT analysis as the established and most appropriate methodology for analyzing VMT impacts under CEQA. Trip-based assessment of VMT captures the full extent of the vehicle trip length, including the portion that extends beyond the jurisdictional boundary. VMT impacts are assessed by quantifying trips to or from a jurisdiction, which start or end within the jurisdiction. Conversely, a boundary-based assessment of VMT impacts is quantified by the length of the vehicle trips that occur within the boundaries of a jurisdiction.

As noted in the current CEQA Guidelines, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT. The guidance provided thus far relative to VMT significance criteria is focused on residential, office, and retail uses. For rural land uses, OPR guidance states that fewer options may be available for reducing VMT for projects in rural areas outside of a metropolitan planning organization and significance thresholds may be best determined on a case-by-case basis. The County is in the process of adopting formal thresholds of significance under SB 743. In lieu of formally adopted thresholds of significance, VMT thresholds consistent with OPR's final technical guidance for the analysis of transportation impacts under CEQA were applied in the analysis presented in this EIR.

Roads and Highways – Safety and Design of Public Roads

A project that affects public roadways or intersections would have a less-than-significant impact on the design of the public road system and/or intersections only if the existing public road/intersection complies with the County Road Standards and the proposed public road/intersection improvement/encroachment complies with the County Road Standards.

Pedestrian/Bicycle Facilities

The evaluation of impacts to pedestrian and bicycle facilities typically involves pedestrian and bike routes to and from schools, commercial centers, and transit stops. The impact analysis considers both existing and planned pedestrian and bicycle facilities. A project that would cause actual or potential barriers to existing or planned pedestrian/bicycle facilities may have a significant impact.

In addition, projects that generate or attract pedestrian/bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities, such as pedestrian overcrossings, traffic signals, and bikeways, may have a significant impact (County 2011).

Bus Transit

Existing planning and transportation analysis tools currently available are not sophisticated enough to quantify with accuracy specific project impacts on bus transit from most development projects. Because the proposed project is expected to generate more than 100 daily vehicle trips, an analysis of potential impacts to bus transit facilities and/or routes is required. A project would typically result in a significant impact on bus transit if the project would substantially interfere with existing bus transit facilities or routes, or if the project would create a substantial increased demand for additional or new bus transit facilities/services (County 2011).

Significance Thresholds

Per the Initial Study Assessment Guidelines (County 2011), impacts related to transportation would be potentially significant if the proposed project would:

1. Have an adverse, significant project-specific or cumulative impact to the safety and design of roads or intersections within the RRN or LRN;
2. If a private road or private access is proposed, will the design of the private road meet the adopted Private Road Guidelines and access standards of the VCFPD as listed in the Initial Study Assessment Guidelines;
3. Be inconsistent with the applicable General Plan Goals and Policies for “Transportation & Circulation – Roads & Highways – Safety & Design of Private Access” in the County’s Initial Study Assessment Guidelines;
4. Involve a road or access, public or private, that complies with VCFPD adopted Private Road Guidelines;
5. Be inconsistent with the applicable General Plan Goals and Policies for “Transportation & Circulation – Roads & Highways – Tactical Access” in the County’s Initial Study Assessment Guidelines;
6. Have an adverse, significant project-specific or cumulative impact to pedestrian and bicycle facilities within the RRN or LRN;
7. Generate or attract pedestrian/bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities;
8. Be inconsistent with the applicable General Plan Goals and Policies for “Transportation & Circulation – Pedestrian/Bicycle Facilities” in the County’s Initial Study Assessment Guidelines;
9. Substantially interfere with existing bus transit facilities or routes, or create a substantial increase in demand for additional or new bus transit facilities/services; and/or
10. Be inconsistent with the applicable General Plan Goals and Policies for “Transportation & Circulation – Bus Transit” in the County’s Initial Study Assessment Guidelines.
11. In addition to significance thresholds in the County’s Initial Study Assessment Guidelines, impacts related to transportation would be potentially significant if the proposed project would:
12. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b); and/or

13. Conflict or be inconsistent with the VMT reduction goals of the OPR's Technical Advisory on Evaluating Transportation Impacts, including guidance for determining the potential VMT impacts of affordable residential units.

Transportation and circulation impacts related to railroads, airports, harbors, and pipelines are discussed in Section 4.10, *Impacts Found Not to be Significant*.

4.7.2.2 Project Impacts and Mitigation Measures

Threshold 12:	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?
Threshold 13:	Would the project conflict or be inconsistent with the VMT reduction goals of the OPR's Technical Advisory on Evaluating Transportation Impacts, including guidance for determining the potential VMT impacts of affordable residential units?

IMPACT T-1 IMPLEMENTATION OF THE PROJECT WOULD NOT RESULT IN A SUBSTANTIAL INCREASE IN VMT BECAUSE THE PROJECT WOULD PROVIDE 100 PERCENT AFFORDABLE RESIDENTIAL UNITS AND WOULD BE CONSISTENT WITH THE COUNTY NCZO FARMWORKER EMPLOYMENT CRITERIA. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The County has not yet adopted a methodology or threshold for VMT analyses. As described in Section 4.7.3(a), OPR's Technical Advisory on Evaluating Transportation Impacts provides technical recommendations regarding assessment of VMT, thresholds of significance and mitigation measures (OPR 2018). OPR offers a generalized recommendation of a 15 percent reduction below existing VMT as a threshold of CEQA significance for residential projects. OPR's Technical Advisory also recommends that projects that include affordable residential units may factor the effect of the affordability on VMT into the assessment of VMT. This analysis discusses the project's anticipated VMT based on the guidance available in OPR's Technical Advisory and the project's consistency with the VMT reduction goals of the Southern California Association of Governments' (SCAG) Regional Transportation Plan-Sustainable Communities Strategy (RTP-SCS).

Vehicle Miles Traveled

According to the SCAG RTP-SCS, average daily VMT per capita in Ventura County is anticipated to be 20.2 miles per capita per day in 2040 (SCAG 2016). New VMT that would result from the proposed project were estimated using the California Emissions Estimator Model (CalEEMod), a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions associated with a variety of land use projects. The input data for the proposed project are discussed in detail in Section 4.1, *Air Quality*. CalEEMod output files for the project are included in Appendix C to this report.

Based on the CalEEMod results, the project would result in approximately 7,286,223 annual VMT, or approximately 19,962 daily VMT (Appendix C). The project could add 1,120 additional people to the area; therefore, this is approximately 17.8 daily VMT per capita. The project would therefore yield a daily VMT per capita of approximately 12 percent less than the Ventura County 2040 average of 20.2 miles per capita per day. In addition, this reduction does not account for the fact that the project is an affordable housing project and is therefore presumed to have a less-than-significant impact.

Affordable housing generates less VMT than market-rate housing and generally improves the jobs-housing match, shortening commutes and reducing VMT (OPR 2018). According to OPR's Technical Advisory on Evaluating Transportation Impacts, evidence supports a presumption of a less than significant impact for a 100 percent affordable residential development in infill locations. The project site is not located in what would ordinarily be defined as an infill location, but it would provide 100 percent affordable multi-family housing for farmworkers and the project site is in an agricultural area near where site residents would likely work. The project also would be consistent with Section 8107-41.1 of the County NCZO farmworker employment criteria; potential residents would be required to demonstrate that they either: (1) earn at least 51 percent of their annual income from qualifying agriculture; and/or (2) are employed in agriculture for at least 51 percent of the total days employed on an annual basis.

The affordable housing components and agricultural location of the project are also consistent with the VMT reduction goals of the SCAG RTP-SCS, which concludes that lower income residents generate lower VMT and demonstrate the largest relative VMT reductions with location efficiency. Therefore, the project would not result in a VMT impact consistent with the VMT reduction goals of the OPR's Technical Advisory on Evaluating Transportation Impacts and would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

Mitigation Measures

No mitigation is required.

Threshold 1:	Would the project have an adverse, significant project-specific or cumulative impact to the safety and design of roads or intersections within the RRN or LRN?
Threshold 2:	Would the project if a private road or private access is proposed, will the design of the private road meet the adopted Private Road Guidelines and access standards of the VCFPD as listed in the Initial Study Assessment Guidelines?
Threshold 4:	Would the project involve a road or access, public or private, that complies with VCFPD adopted Private Road Guidelines?

IMPACT T-2 THE PROJECT WOULD NOT MODIFY OR OTHERWISE IMPACT THE DESIGN OF ANY PUBLIC ROADS OR INTERSECTIONS. DIRECT ACCESS TO THE PROJECT WILL BE PROVIDED VIA TWO SHARED ACCESS CONNECTIONS THAT WILL BE DESIGNED TO MEET THE COUNTY FIRE DEPARTMENT DESIGN STANDARDS TO PROVIDE EMERGENCY VEHICLES ACCESS. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The project would not modify or otherwise impact the design of any public roads or intersections. Regional access to the project is provided by U.S. Highway 101 and State Route 118. Direct access to the project would be provided via two shared access connections to Somis Road (State Route 34) with the North Pleasant Valley Groundwater Desalter Facility. The City of Camarillo will construct a new access connection to Somis Road and improve an existing connection to Somis Road as part of the North Pleasant Valley Groundwater Desalter Facility, approximately 700 feet southwest of where the eastern driveway would intersect with Somis Road at a T-intersection. A shared access agreement allowing the project to utilize the two driveway connections has been established. The segment of Somis Road adjacent to the site access is relatively straight and level, providing good sight distance. The City of Camarillo will be required to construct the access connections to Somis Road to County of Ventura and Caltrans design standards. The two access connections to Somis Road will be designed to meet the County Fire Department design standards to provide emergency

vehicles access. Therefore, the project would result in a less than significant impact associated with public roadway or intersection design and private access.

Mitigation Measures

No mitigation is required.

Threshold 6:	Would the project have an adverse, significant project-specific or cumulative impact to pedestrian and bicycle facilities within the RRN or LRN?
Threshold 7:	Would the project generate or attract pedestrian/bicycle traffic volumes meeting requirements for protected highway crossings or pedestrian and bicycle facilities?

IMPACT T-3 IMPLEMENTATION OF THE PROJECT WOULD NOT MODIFY OR BLOCK EXISTING OR PLANNED PEDESTRIAN/BICYCLE FACILITIES OR OTHERWISE HAVE AN ADVERSE IMPACT ON EXISTING PEDESTRIAN OR BICYCLE FACILITIES. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Figure 2-3b in Section 2, *Project Description*, shows the proposed housing complex site plan, which includes two shared access connections to Somis Road with a bicycle/pedestrian pathway on the southern access connection. The two access connections to Somis Road would be designed to meet the County Fire Department design standards for the provision of emergency vehicles access. The project also includes a network of meandering pedestrian walkways to provide pedestrian circulation throughout the housing complex. In addition, 379 bicycle parking spaces would be available throughout the housing complex. The project would not modify or block existing or planned pedestrian/bicycle facilities or otherwise have an adverse impact on existing pedestrian or bicycle facilities. Therefore, the project would result in a less than significant impact with respect to pedestrian/bicycle facilities.

Mitigation Measures

No mitigation is required.

Threshold 9:	Would the project substantially interfere with existing bus transit facilities or routes, or create a substantial increase in demand for additional or new bus transit facilities/services?

IMPACT T-4 THE PROJECT'S AFFORDABLE FARMWORKER HOUSING WOULD NOT INTERFERE WITH EXISTING BUS TRANSIT FACILITIES OR ROUTES OR CREATE A SUBSTANTIAL INCREASE IN DEMAND FOR ADDITIONAL OR NEW BUS TRANSIT FACILITIES/SERVICES. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The project site is located approximately 1 mile southwest of the Somis stop on the Cross Country Limited (Route 77) Ventura County Transportation Commission (VCTC) bus service. The project would provide affordable farmworker housing that would improve the jobs-housing match, shortening commutes to and from the agricultural portions of the County. As a result, the project would not directly affect the Somis stop. Additionally, some farmworkers may use bus service but not in sufficient numbers to overburden the line. Therefore, the project would result in a less than significant impact to bus transit facilities.

Mitigation Measures

No mitigation is required.

Threshold 3:	Would the project be inconsistent with the applicable General Plan Goals and Policies for "Transportation & Circulation – Roads & Highways – Safety & Design of Private Access" in the County's Initial Study Assessment Guidelines?
Threshold 5:	Would the project be inconsistent with the applicable General Plan Goals and Policies for "Transportation & Circulation – Roads & Highways – Tactical Access" in the County's Initial Study Assessment Guidelines?
Threshold 8:	Would the project be inconsistent with the applicable General Plan Goals and Policies for "Transportation & Circulation – Pedestrian/Bicycle Facilities" in the County's Initial Study Assessment Guidelines?
Threshold 10:	Would the project be inconsistent with the applicable General Plan Goals and Policies for "Transportation & Circulation – Bus Transit" in the County's Initial Study Assessment Guidelines?

IMPACT T-5 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would be consistent with the County General Plan goals and policies listed previously under Regulatory Setting. The project's consistency is analyzed in detail in Section 4.10, *Land Use and Planning*. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.7.2.3 Cumulative Impacts

Cumulative development would generally increase VMT and demand for transit facilities in the Somis area. According to the SCAG RTP-SCS, average daily VMT per capita in Ventura County is anticipated to be 20.2 miles per capita per day in 2040 (SCAG 2016). The VMT analysis in this section is cumulative in nature, in that it accounts for anticipated future development. As previously discussed, based on the CalEEMod results, the project would result in approximately 7,286,223 annual VMT, or approximately 19,962 daily VMT (Appendix C). The project could add 1,120 additional people to the area; therefore, this is approximately 17.8 daily VMT per capita. Thus, the project would yield a daily VMT per capita of approximately 12 percent less than the Ventura County 2040 average of 20.2 miles per capita per day. In addition, this reduction does not account for the fact that the project is an affordable housing project and is therefore presumed to have a less than significant impact, and cumulative VMT impacts would be less than significant.

Like the proposed project, cumulative development projects would be subject to public safety requirements from County Fire Department, City of Camarillo, County of Ventura, and Caltrans design standards. Consequently, cumulative impacts related to the safety of roads would be less than significant.

Two cumulative development projects (Project Nos. 42 and 44, as shown in Figure 3-1) are located within 0.5 mile of the project site. Project No. 42 is the North Pleasant Valley Groundwater Desalter Facility, which would not generate or attract pedestrian, bicycle, or bus transit demands that would interfere with local facilities. Project No. 44 is a 281-unit residential facility. Development of the proposed project and Project No. 44 would increase demand on local pedestrian, bicycle, and bus transit facilities. However, as described above, the proposed project would not modify or block

existing or planned pedestrian/bicycle facilities or otherwise have an adverse impact on existing pedestrian or bicycle facilities. In addition, the project would provide affordable farmworker housing that would improve the jobs-housing match, shortening commutes to and from the agricultural portions of the County. As a result, the project would not directly affect the Somis stop. Additionally, some farmworkers may use bus service but not in sufficient numbers to overburden the line. Therefore, cumulative impacts to pedestrian, bicycle, and bus transit facilities would be less than significant.

Mitigation Measures

No mitigation is required.

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4.8 Waste Treatment and Disposal Facilities – Solid Waste Facilities

This section assesses potential impacts associated with the proposed project, including the community wastewater treatment facility (CWWTF). In accordance with the County's Initial Study Assessment Guidelines, the analysis in this section focuses on impacts related to biosolids generated and temporarily stored at the CWWTF. The analysis in this section is based in part on the Preliminary On-Site Wafstewater Treatment System Design Report by WREA dated October 2019 (Appendix B). Impacts related to solid waste management (e.g., landfill disposal capacity) are discussed in Section 4.11, *Less Than Significant Environmental Effects*.

4.8.1 Setting

4.8.1.1 Project Site

The project site is currently undeveloped and used for growing row crops. No biosolids are currently generated or stored on-site.

4.8.1.2 Regulatory Setting

State Regulations

California Health and Safety Code, Division 104, Part 13, Chapter 4, Article 7

The California Health and Safety Code, Division 104, Part 13 (Environmental Health) contains regulations for garbage and onsite sewage disposal in California. Chapter 4 (Waste and Waste Disposal), Article 7 (Solid Waste Handling and Disposal) requires the department to prepare and submit minimum standards for solid waste handling and disposal for the protection of the public health.

California Code of Regulations, Title 14, Division 7

CCR Title 14, Division 7 pertains to the California Department of Resources Recycling and Recovery (CalRecycle). Chapter 3 includes minimum standards for solid waste handling and disposal.

California Code of Regulations, Title 27, Division 2

CCR Title 27 (Environmental Protection), Division 2 includes regulations for the treatment, storage, processing, and disposal of solid waste. This division includes criteria for all waste management units, facilities, and disposal sites.

California Public Resources Code, Division 30

In 1989, the California legislature enacted this division as the California Integrated Waste Management Act of 1989. One of the key provisions of this division is to encourage the reduction, recycling, and reuse of solid waste generated in the state.

Local Regulations

Ventura County Ordinance Code, Division 4, Chapter 7

The Ventura County Ordinance Code, Division 4, Chapter 7 includes regulations for solid waste storage, collection, disposal, transfer, resource recovery, and environmental health permits and fees. Section 4706 prohibits maintenance, handling, and storage of solid waste in a manner in which the solid waste: (a) is carried or deposited by the natural elements, such as wind or rain, onto or into any public street, sidewalk, waterway, or other public property; (b) is carried or deposited by the natural elements, such as wind or rain, onto or into any private property owned, leased, or controlled by another person; (c) harbors or breeds any vectors including rats, other rodents, flies, or harmful insects; or (d) pollutes surface or groundwater.

Ventura County General Plan

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goals 4.4.1-1 and 4.4.1-2 and Policies 4.4.2-1, 4.4.1-4, and 4.4.1-6 pertain to solid waste facilities. However, Policies 4.4.2-1 and 4.4.2-4 are not applicable to the proposed project as those policies pertain to projects that are community sewage or solid waste facilities.

- **Goals**
  - **4.4.1-1.** Ensure the provision of adequate individual and public sewage/waste collection, treatment, and disposal facilities to meet the County's current and future needs in a manner which will protect the natural environment and ensure protection of the public's health, safety, and welfare.
  - **4.4.1-2.** Ensure continuous waste disposal capacity to meet the County's current and projected waste disposal needs.
- **Policies**
  - **4.4.2-6.** Applicants for discretionary development shall be encouraged to employ practices that reduce the quantities of wastes generated and shall be requested to engage in recycling activities to further reduce the volume of waste disposed of in landfills.

4.8.2 Impact Analysis

4.8.2.1 Significance Thresholds

Impacts related to solid waste facilities would be potentially significant if the proposed project would:

1. Comply with applicable state and local requirements as set forth in the "Waste Treatment & Disposal Facilities – Solid Waste Facilities" section of the Initial Study Assessment Guidelines; and/or
2. Be inconsistent with the applicable General Plan Goals and Policies for "Waste Treatment & Disposal Facilities – Solid Waste Facilities" in the County's Initial Study Assessment Guidelines.

4.8.2.2 Project Impacts and Mitigation Measures

Threshold 1:	Would the project comply with applicable state and local requirements as set forth in the "Waste Treatment & Disposal Facilities – Solid Waste Facilities" section of the Initial Study Assessment Guidelines?

IMPACT SW-1 THE CWWTF DESIGN WOULD BE SUBJECT TO REVIEW BY AND APPROVAL FROM THE ENVIRONMENTAL HEALTH DIVISION OF THE RESOURCE MANAGEMENT AGENCY OF THE COUNTY OF VENTURA. THE PROJECT WOULD COMPLY WITH APPLICABLE STATE AND LOCAL REQUIREMENTS AS SET FORTH IN THE "WASTE TREATMENT & DISPOSAL FACILITIES – SOLID WASTE FACILITIES" SECTION OF THE INITIAL STUDY ASSESSMENT GUIDELINES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project site is located more than 200 feet from the closest existing Camarillo Sanitary District facilities and is outside both the Camarillo city limits and the Camarillo Sanitary District limits. For these reasons, the Camarillo Sanitary District on-site wastewater treatment would be required for the proposed housing complex.

As described in Section 2, *Project Description,* the proposed project would include construction and operation of a CWWTF that would treat all domestic wastewater generated at the project site to tertiary treatment standards. At full occupancy of the housing complex, the CWWTF would treat an estimated average daily flow of 99,000 gallons of wastewater per day (WREA 2019). Wastewater treatment processes would generate both treated wastewater effluent and biosolid waste. The term "biosolids" refers to solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in a treatment plant, also referred to as sewage sludge. "Activated sludge" refers to aerated sewage containing aerobic microorganisms, which help to decompose and break down raw sewage. The CWWTF would not discharge effluent or solid waste into either the County or City of Camarillo sewer systems.

Recycled water would be applied as irrigation water on adjacent agricultural lands. Excess treated wastewater effluent would be dispersed via underground seepage pits. Potential water quality impacts related to the proposed project's recycled water and seepage pits are analyzed in Section 4.10, *Water Resources – Surface Water Quality*.

Biosolids would be temporarily stored on-site and then transported for disposal off-site. Section 4706 of the Ventura County Ordinance Code, Division 4, Chapter 7, prohibits maintenance, handling, and storage of solid waste in a manner in which the solid waste: (a) is carried or deposited by the natural elements, such as wind or rain, onto or into any public street, sidewalk, waterway, or other public property; (b) is carried or deposited by the natural elements, such as wind or rain, onto or into any private property owned, leased, or controlled by another person; (c) harbors or breeds any vectors including rats, other rodents, flies, or harmful insects; or (d) pollutes surface or groundwater.

Sludge wasting pumps would remove a portion of the activated sludge (biosolids) from the CWWTF treatment process to two approximately 12,000-gallon sludge storage tanks until the biosolids are transported for disposal at a facility licensed to accept this type of waste (WREA 2019). Biosolids stored in the sludge storage tanks would not be open to the air, and would therefore not be susceptible to being carried away by natural elements, support any vector habitat, or pollute surface or groundwater.

As discussed in Section 4.10.37, *Waste Treatment and Disposal Facilities – Solid Waste Management*, both the Simi Valley Landfill and Recycling Center and the Toland Road Landfill accept sludge (biosolids) waste and have capacity to accommodate the proposed project's solid waste.

The CWWTF design would be subject to review and approval from the Environmental Health Division of the Resource Management Agency of the County of Ventura. The Environmental Health Division has been designated as the Local Enforcement Agency (LEA) by the County and the incorporated cities within Ventura County, and certified as the LEA by provisions set forth in state minimum standards. The LEA is responsible for the enforcement of State statutes and regulations relative to the storage, transfer, processing, handling, and disposal of solid waste. "State Minimum Standards" refer to the standards and regulations amended and adopted by the state regulatory agency under the California Integrated Waste Management Act of 1989 governing how, when, where, and under what conditions any person may operate or conduct any solid waste operation or facility, solid waste processing, solid waste composting, solid waste handling, or any other solid waste activity, including without limitation the design of any facility or site where such activities may occur.

As the designated LEA for the area, the Environmental Health Division is responsible for the enforcement of State statutes and regulations related to the storage, transfer, processing, handling, and disposal of solid waste. The Environmental Health Division's review process would ensure compliance with applicable state and local requirements pertaining to the storage and transport of biosolids in the project's Conditions of Approval.

Impacts related to compliance with applicable state and local requirements as set forth in the "Waste Treatment & Disposal Facilities – Solid Waste Facilities" section of the Initial Study Assessment Guidelines would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 2:	Would the project be consistent with the applicable General Plan Goals and Policies for "Waste Treatment & Disposal Facilities – Solid Waste Facilities" in the County's Initial Study Assessment Guidelines?

IMPACT SW-2 THE PROJECT WOULD BE CONSISTENT WITH THE APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would be consistent with the County General Plan goals and policies listed previously under Regulatory Setting. The project's consistency is analyzed in detail in Section 4.10, *Land Use and Planning*. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.8.2.3 Cumulative Impacts

Table 3-1 in Section 3, *Environmental Settings,* identifies currently planned and pending projects in the vicinity of the project site. Project PL19-0026, located at 1122 Cawelti Road, would involve the development of an agricultural storage yard. The project would include the installation of two

aboveground liquid waste holding tanks (6,000 gallons each) and a loading/spill containment area for temporarily storing liquid waste from portable toilets located on Marz Farms' properties only.

Cumulative development would generally increase density in the Somis area, but would not increase density on the project site beyond the full build-out analyzed in this EIR. The proposed project's CWWTF would be designed to accommodate the full buildout of the project's housing complex, and would not serve other existing or future development. Therefore, the burden on the solid waste facility (i.e., biosolids handling and transport associated with operation of the CWWTF) would not intensify by projects other than the proposed project. Similarly, Project PL19-0026 would temporarily store liquid waste from portable toilets located on its property. Neither the proposed project nor Project PL19-0026 would serve as a permanent solid waste disposal facility. Further cumulative development would not intensify the solid waste storage burdens on these two projects. Consequently, cumulative impacts related to solid waste facilities would be less than significant.

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4.9 Water Resources – Surface Water Quality

This section analyzes the potential impacts on surface water quality that could result from implementation of the proposed project.

This section relies in part on information from the Preliminary Hydrology Memo prepared by Jensen Design and Survey (Appendix I) and the Seepage Pit Performance Test prepared by Earth Systems Pacific (Appendix G).

4.9.1 Setting

4.9.1.1 Calleguas Creek Watershed

The project site is located in the Calleguas Creek Watershed, as shown in Figure 4.9-1. The Calleguas Creek Watershed is located in the southeastern potion of Ventura County and drains an approximately 220,000-acre area. Approximately 85 percent of the rainfall in the watershed occurs from November to March. The Santa Susana and Oak Ridge Mountains form the northern boundary of the watershed, while the southern boundary is delineated by the Simi Hills and Santa Monica Mountains. The watershed includes the cities of Oxnard, Port Hueneme, Camarillo, Moorpark, Simi Valley, and Thousand Oaks, in addition to portions of unincorporated Ventura County (Ventura 2020a).

The greater Calleguas Creek Watershed is made up of seven sub-watersheds at the 12-digit hydrologic unit code (HUC) scale. Land uses vary throughout the watershed, with approximately 50 percent undeveloped land, 25 percent urban areas, and 25 percent agricultural areas (County 2020a)

4.9.1.2 Surface Waters

Major surface water features in the Calleguas Creek Watershed are discussed below and include Lake Bard, Arroyo Simi/Arroyo Las Posas/Calleguas Creek system, Conejo Creek system, Honda Barranca/Beardsley Wash/Revolon Slough, and Mugu Lagoon. Surface waters in the vicinity of the project site are shown in Figure 4.9-1.

Regional

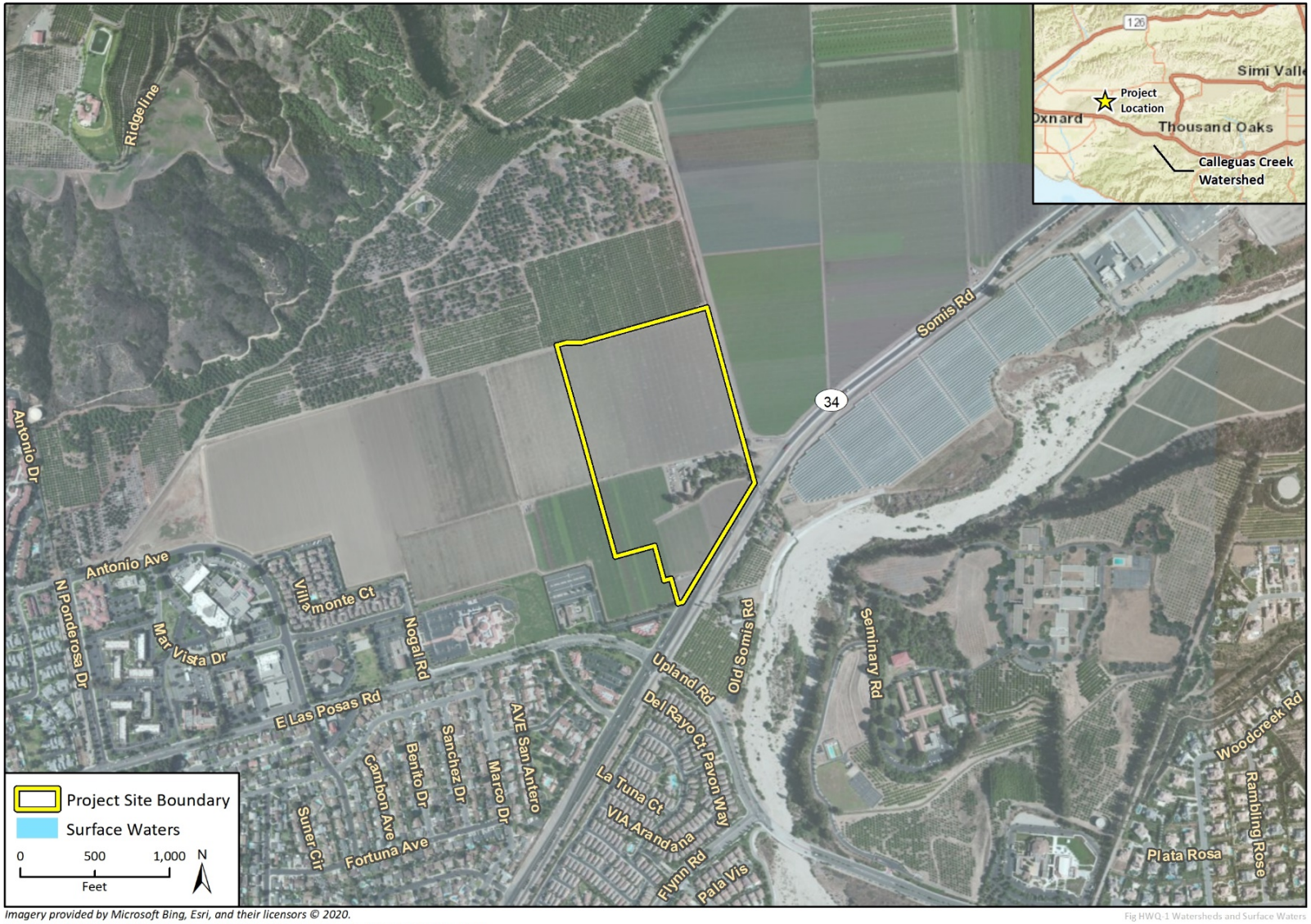
Lake Bard

Lake Bard is an approximately 10,500-acre-foot (AF) surface water reservoir constructed to store treated water from the Metropolitan Water District of Southern California. This water is used to meet emergency demands. Lake Bard is operated by Calleguas Municipal Water District (County 2020a).

Arroyo Simi/Arroyo Las Posas/Calleguas Creek System

This series of creeks drain precipitation and urban runoff from Simi Valley, the eastern Las Posas Valley, much of Pleasant Valley, and the eastern portion of the Oxnard Plain. In addition, Arroyo Simi Creek conveys discharges from a series of dewatering wells operated by the City of Simi Valley, as well as treated effluent from the Simi Valley Water Quality Control Plant. Calleguas Creek also conveys discharge effluent from the Ventura County Waterworks District No. 1's Moorpark

Figure 4.9-1 Watersheds and Surface Waters in the Project Area



Imagery provided by Microsoft Bing, Esri, and their licensors © 2020.
Hydrology data provided by U.S. Geological Survey, 2019, and U.S. Fish & Wildlife Service, 2020.

Fig HWQ-1 Watersheds and Surface Waters

Wastewater Treatment and the Camrosa Water District Water Reclamation Facility under certain conditions (County of Ventura 2020a). The project site is located approximately 800 feet northwest of Arroyo Las Posas Creek.

Conejo Creek System

The Arroyo Santa Rosa, Arroyo Conejo, and Conejo creeks make up the Conejo Creek system. The Santa Rosa Valley, portions of Pleasant Valley, Tierra Rejada Valley, and the City of Thousand Oaks are drained by this system. This system conveys precipitation, agricultural runoff, and effluent from the Hill Canyon Wastewater Treatment Plant and Camarillo Sanitary District Wastewater Reclamation Plant (County of Ventura 2020a).

Honda Barranca/Beardsley Wash/Revolon Slough

The western portion of Las Posas Valley, portions of Pleasant Valley, and portions of the Oxnard Plain are drained by the Honda Barranca/Beardsley Wash/Revolon Slough system. The majority of flow conveyed by this slough comes from agricultural and storm water drainage (County of Ventura 2020a).

Mugu Lagoon

Mugu Lagoon, located at the mouth of the Calleguas Creek Watershed, is a saltwater wetland habitat. Agricultural fields on the Oxnard Plain drain into the Mugu Lagoon via Calleguas Creek and its tributaries (State Water Resources Control Board [SWRCB] 2020).

Project Site

The project site is currently undeveloped and used for growing row crops. The site drains from north to south/southwest at an average slope of less than one percent. Stormwater flow from the project site is directed towards a drainage channel along the west side of the site. The drainage channel flows south to the edge of the Rancho Campana High School parking lot and turns west between the neighboring Rancho Campana High School and Church of Latter-Day Saints properties. The drainage channel conveys flows into an inlet structure 300 feet west of the project site. From here, a City of Camarillo storm drain system carries the stormwater runoff flow to Calleguas Creek (Jensen 2019).

4.9.1.3 Water Quality

Water quality impairments in the Calleguas Creek and its tributaries include ammonia, boron, copper, bacteria, nitrogen, nitrate, selenium, and sulfate, as well as insecticides and pesticides such as dichloro-diphenyl-trichloroethane (DDT), dieldrin, and toxaphene. The Channel Islands Harbor area is impaired by lead and zinc in sediments, and several Oxnard area beaches are impaired by bacteria (County 2020a).

4.9.1.4 Regulatory Setting

Federal Regulations

Clean Water Act

The federal Clean Water Act (CWA), enacted by Congress in 1972 and amended several times, is the primary federal law regulating water quality in the United States. The CWA established the basic

structure for regulating discharges of pollutants into jurisdictional waters of the United States and forms the basis for several state and local laws throughout the country. The CWA gives the United States Environmental Protection Agency (U.S. EPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the CWA is administered by the U.S. EPA and United States Army Corps of Engineers (USACE). At the state and regional levels in California, the CWA is administered and enforced by the California SWRCB and the nine Regional Water Quality Control Boards (RWQCBs). The project site is located within the jurisdiction of the Los Angeles RWQCB.

Clean Water Act Section 303(d): List of Impaired Water Bodies

Section 303(d) of the CWA requires states, territories, and tribes to identify water bodies that do not meet the water quality objectives (WQOs) for their designated beneficial uses. Each state must submit an updated biennial list of water quality impaired water bodies, called the 303(d) list, to the U.S. EPA. The 303(d) list also identifies the pollutant(s) or stressor(s) causing water quality impairment and establishes a priority for developing a control plan to address the impairment. If a water body is designated as "impaired," then a Total Maximum Daily Load (TMDL) is developed and identified for the affected water body. A TMDL establishes the maximum daily amount of a pollutant allowed in an identified water body and is used as a planning tool in addressing water quality impairments and improving water quality.

Water bodies of the Calleguas Creek Watershed that have been listed under Section 303(d) as impaired are listed in Table 4.9-1 (2014-2016 approved 303(d) list).

Table 4.9-1 Impaired Waters of the Calleguas Creek Watershed in the Vicinity of the Project Site

Water Body	Water Quality Impairments
Mugu Lagoon (Calleguas Creek, Reach 1)	Chlordane, copper, DDT, dieldrin, endosulfan, mercury, nickel, nitrogen, PCBs, sediment toxicity, sedimentation/siltation, toxaphene, zinc
Calleguas Creek, Revolon Slough, Arroyo Simi, Arroyo Las Posas (Calleguas Creek Reaches 2-8)	Ammonia, Chem A, chlordane, copper, DDT, dieldrin, endosulfan, fecal coliform, nitrogen, PCBs, sediment toxicity, siltation, toxaphene, trash, chloride, nitrate and nitrite, total dissolved solids, chlorpyrifos, diazinon, selenium, toxicity, sulfates, boron, indicator bacteria, organophosphorus pesticides

Source: SWRCB 2016

PCBs: polychlorinated biphenyls

Clean Water Act Section 404

Under Section 404 of the CWA, proposed discharges of dredged or fill material into waters of the U.S. require USACE authorization. Waters of the U.S. generally include tidal waters, lakes, ponds, rivers, streams (including intermittent streams), and wetlands (with the exception of isolated wetlands). The USACE identifies wetlands using a multi-parameter approach, which requires positive wetland indicators in three distinct environmental categories: hydrology, soils, and vegetation. According to the USACE (1987) Wetlands Delineation Manual, except in certain situations, all three parameters must be satisfied for an area to be considered a jurisdictional wetland. Applications for CWA Section 404 permits must show the applicant has:

- Taken steps to avoid impacts to wetlands or waters of the U.S. where practicable;
- Minimized unavoidable impacts on waters of the U.S. and wetlands; and
- Provided mitigation for unavoidable impacts.

State Regulations

Clean Water Act Section 401

Under Section 401 of the CWA, the State RWQCBs have regulatory authority over actions in waters of the U.S. and the State of California through the issuance of water quality certifications, which are issued in conjunction with any federal permit (i.e., the federal permit will not be issued unless and until the State issues the required water quality certification). Some of the major federal licenses and permits subject to Section 401 include CWA Section 402 (described below) and CWA Section 404 (described above) permits issued by the USACE. Section 401 of the CWA provides the SWRCB (and the RWQCBs) with the regulatory authority to waive, certify, or deny any proposed activity that could result in a discharge to surface waters. To waive or certify an activity, the SWRCB and RWQCB must determine that the proposed discharge would comply with State water quality standards, including those protecting beneficial uses and water quality, as defined in the applicable Water Quality Control Plan(s) (described below, under *Porter-Cologne Water Quality Control Act*). If the SWRCB/RWQCB denies a proposed activity, the federal permit cannot be issued. As noted with respect to the CWA Section 404, a CWA Section 401 water quality certification is required for projects involving the discharge of dredge or fill material to wetlands or other bodies. Jurisdictional streambeds and associated riparian habitat are also regulated by the California Department of Fish and Wildlife (CDFW) under Section 1602 of the California Fish and Game Code.

Clean Water Act Section 402: National Pollutant Discharge Elimination System

In 1987, amendments to the CWA added Section 402, which established the National Pollutant Discharge Elimination System (NPDES) program. This is a framework to protect water quality by regulating industrial, municipal, and construction-related sources of pollutant discharges to waters. In accordance with Section 402, the CWA prohibits discharges of stormwater from construction projects unless the discharge is in compliance with an NPDES permit.

In California, the NPDES program is administered by the SWRCB through the nine RWQCBs. The SWRCB has adopted an NPDES *General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities* (*Construction General Permit*) (Order 2009-0009, as amended by Orders 2010-0014-DWQ and 2012-006-DWQ). Compliance with the *Construction General Permit* is required for projects that result in more than one acre of ground disturbance, including through clearing, grading, grubbing, excavating, stockpiling, and removing or replacing existing facilities. The *Construction General Permit* requires the landowner and/or contractor to file permit registration documents prior to commencing construction and pay a fee annually throughout the duration of construction. These documents include a notice of intent, risk assessment, site map, stormwater pollution prevention plan (SWPPP), and signed certification statement. The *Construction General Permit* specifies minimum Best Management Practice (BMP) requirements for stormwater control based on the risk level of the site. The SWPPP must include measures to ensure the following:

- All pollutants and their sources are controlled;
- Non-stormwater discharges are identified and eliminated, controlled, or treated;

- Site BMPs are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges; and
- BMPs installed to reduce or eliminate pollutants post-construction are completed and maintained.

The proposed project would be subject to the NPDES *Construction General Permit* and would require development and implementation of a SWPPP for project construction.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Division 7 of the California Water Code) is the primary statute addressing surface water quality in California. Under Porter-Cologne, the SWRCB has the ultimate authority over the State's water quality policy. The SWRCB administers surface water rights, water pollution control, and water quality functions throughout the state, while the nine RWQCBs conduct planning, permitting, and enforcement activities. The RWQCBs also regulate water quality under Porter-Cologne through the regulatory standards and objectives set forth in Water Quality Control Plans (also referred to as "Basin Plans") prepared for each region.

The project is located in the jurisdiction of the Los Angeles RWQCB, which includes coastal drainages from Rincon Point (western boundary of Ventura County) to the eastern Los Angeles County boundary. Per the requirements of the CWA and the California Porter-Cologne Act, the Los Angeles RWQCB has prepared a Water Quality Control Plan (Basin Plan) for the watersheds under its jurisdiction, also referred to as the "Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties." The Basin Plans from all nine of the RWQCBs and the California Ocean Plan (prepared and implemented by SWRCB) collectively constitute the State Water Quality Control Plan.

The Los Angeles RWQCB Basin Plan has been designed to support the intentions of the CWA and the Porter-Cologne Act by: (1) characterizing watersheds within the Los Angeles Region; (2) identifying beneficial uses that exist or have the potential to exist in each water body; (3) establishing water quality objectives for each water body to protect beneficial uses or allow their restoration, and; (4) providing an implementation program that achieves water quality objectives. Implementation program measures include monitoring, permitting, and enforcement activities. Per the requirements of CWA Section 303(c), the Basin Plan is reviewed every three years and revised as necessary to update the plan and meet new legislative requirements.

The Basin Plan identifies beneficial uses of surface water bodies within its jurisdiction, which are used to establish WQOs as discussed above for Section 303(d), and to set discharge prohibitions to protect water quality as discussed above for Section 404 (regulates discharges to waters of the U.S.) and Section 402 (establishes the NPDES program). Table 4.9-2 lists the beneficial uses of surface waters in the Calleguas Creek Watershed.

As previously discussed, regarding Section 303(d) of the CWA, WQOs are the limits or levels of pollutant constituents or the characteristics of a water body that are established by the Los Angeles RWQCB for the reasonable protection of beneficial uses of water. WQOs are numeric limits and narrative objectives designed to ensure that bodies of water in the state can support their designated beneficial uses. At concentrations equal to or greater than the numeric objectives, constituents (or pollutants) are considered to have impaired the beneficial uses of the state's water. In some cases, objectives are narrative (qualitative), rather than numerical.

Table 4.9-2 Beneficial Uses for Surface Waters of the Calleguas Creek Watershed

Water Body	Beneficial Uses
Mugu Lagoon	Navigation, water-contact recreation (potential), non-water contact recreation, commercial and sport fishing, estuarine habitat, marine habitat, wildlife habitat, preservation of biological habitats, rare, threatened or endangered species habitat, migration of aquatic organisms, spawning habitat, shellfish harvesting, wetland habitat
Calleguas Creek (Arroyo Simi, Arroyo Las Posas)	Municipal water supply (potential), industrial water supply, industrial process supply, agricultural supply, groundwater replenishment, water-contact recreation, non-water contact recreation, warm freshwater habitat, wildlife habitat, wetland habitat
Conejo Creek	Municipal water supply (potential), industrial water supply, industrial process supply, agricultural supply, groundwater replenishment, water-contact recreation, non-water contact recreation, warm freshwater habitat, wildlife habitat
Arroyo Conejo	Municipal water supply (potential), groundwater replenishment (intermittent), freshwater replenishment (intermittent), water-contact recreation (intermittent), non-water contact recreation (intermittent), warm freshwater habitat (intermittent), wildlife habitat

Source: Los Angeles RWQCB 2020

Policy for Water Quality Control for Recycled Water (Recycled Water Policy)

The purpose of the Recycled Water Policy (SWRCB 2018) is to increase the use of recycled water from municipal wastewater sources meeting the definition in California Water Code Section 13050(n) in a manner that implements state and federal water quality laws. The Recycled Water Policy provides goals for recycled water use in California, guidance for use of recycled water that considers protection of water quality, criteria for streamlined permitting of recycled water projects, and requirements for monitoring recycled water for constituents of emerging concern.

The Recycled Water Policy was adopted in 2009, amended in 2013, and amended again in 2018. The 2018 amendment included the following:

1. Removal of statewide recycled water mandates;
2. Addition of narrative goals for the production and use of recycled water;
3. Establishment of treated wastewater and recycled water reporting requirements statewide;
4. Clarification of the process for recycled water project proponents to comply with California Water Code Section 1211 for wastewater change petitions;
5. Updates to requirements for salt and nutrient management planning;
6. Improvement of consistency in permitting of recycled water projects by encouraging the use of statewide water reclamation requirements for non-potable recycled water use, removing streamlined permitting criteria for landscape irrigation recycled water projects, and adding permitting guidance for reservoir augmentation projects;
7. Updates to monitoring requirements for constituents of emerging concern in recycled water used for groundwater recharge and reservoir water augmentation, and
8. Incorporation of other substantive and non-substantive changes.

The proposed project incorporates recycled water and is subject to compliance with the State's Recycled Water Policy.

California Code of Regulations Water Recycling Criteria

California Code of Regulations Title 22, Division 4, *Environmental Health*, Chapters 1 through 3 outline California's health laws related to recycled water. The intent of these regulations is to ensure protection of public health associated with the use of recycled water. The regulations establish acceptable levels of constituents in recycled water for a range of uses and assurance of reliability in the production of recycled water.

Local Regulations

Ventura County Municipal Separate Storm Sewer System (MS4) Permit

Polluted stormwater runoff commonly flows through municipal separate storm sewer systems (MS4s) and discharged into local water bodies. To prevent harmful pollutants from flowing or being dumped into MS4s, certain operators are required to obtain NPDES permits and develop stormwater management programs. Ventura County has an MS4 Permit (NPDES No. CAS004002) that applies to the unincorporated areas of Ventura County and the Ventura County Watershed Protection District. In accordance with the Ventura County MS4 Permit, all new development projects equal to one acre or greater of disturbed area and adding more than 10,000 square feet of impervious surface area are required to control pollutants, pollutant loads, and runoff volume emanating from impervious surfaces through infiltration, storage for reuse, evapotranspiration, or bioretention/ biofiltration.

The Ventura County Stormwater Program implements the Ventura County MS4 Permit through review of proposed land development projects for compliance with water quality requirements. The Ventura County Stormwater Program's review process generally focuses on the following areas:

- Post-construction impact of new development and redevelopment projects on stormwater runoff;
- Construction, demolition, or soil disturbance impact on stormwater runoff;
- Proposed land use impact on surface water quality;
- Compliance with the County General Plan and Area Plans as related to surface water and stormwater quality;
- Potential impact of stormwater discharge from material storage areas, vehicle or equipment fueling areas, vehicle or equipment maintenance (including washing) areas, waste handling areas, hazardous materials handling or storage areas, delivery areas or loading docks, or other outdoor work areas;
- Potential of stormwater discharge to impair the beneficial uses of the receiving waters;
- Potential impact of stormwater discharge to cause significant harm on the biological integrity of the waterways and waterbodies;
- Potential for significant changes in the flow velocity or volume of storm water runoff to cause harm to or impair the beneficial uses of natural drainage systems; and
- Potential for significant increases in erosion at the project site or surrounding areas (County 2020b).

Ventura County Stormwater Quality Management Ordinance for Unincorporated Areas

Code No. 4450 protects the stormwater quality in the County's unincorporated area. The ordinance requires new development projects to submit a Post-Construction Stormwater Management Plan

(PCSMP) to the County, demonstrating how post-construction stormwater runoff control measures will be implemented. This ordinance supplements implementation of the Ventura County MS4 Permit.

Ventura County General Plan

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goals 1.3.1-1 through 1.3.1-3 and 1.3.1-6 and Policies 1.3.2-1, 1.3.2-2, 1.3.2-4, 1.3.2-6, and 1.3.2-10 pertain to surface water quality. However, Policies 1.3.2-6 and 1.3.2-10 are not applicable to the proposed project as those policies pertain to use of Santa Clara River and new golf courses, respectively.

- **Goals**
  - **1.3.1-1.** Inventory and monitor the quantity and quality of the County's water resources.
  - **1.3.1-2.** Effectively manage the water resources of the County by adequately planning for the development, conservation, and protection of water resources for present and future generations.
  - **1.3.1-3.** Maintain and, where feasible, restore the chemical, physical, and biological integrity of surface and groundwater resources.
  - **1.3.1-6.** Promote reclamation and reuse of wastewater for recreation, irrigation and to recharge aquifers.
- **Policies**
  - **1.3.2-1.** Discretionary development which is inconsistent with the goals and policies of the County's Water Management Plan (WMP) shall be prohibited, unless overriding considerations are cited by the decision-making body.
  - **1.3.2-2**. Discretionary development shall comply with all applicable County and State water regulations.
  - **1.3.2-4**. Discretionary development shall not significantly impact the quantity or quality of water resources within watersheds, groundwater recharge areas, or groundwater basins.

4.9.2 Impact Analysis

4.9.2.1 Significance Thresholds

Per the Initial Study Assessment Guidelines (County 2011), impacts related to surface water quality would be potentially significant if the proposed project would:

1. Individually or cumulatively degrade the quality of surface water, causing it to exceed water quality objectives as contained in Chapter 3 of the three Basin Plans.
2. Directly or indirectly cause storm water quality to exceed water quality objectives or standards in the applicable MS4 Permit or any other NPDES Permits.
3. Be inconsistent with the applicable General Plan Goals and Policies for "Water Resources – Surface Water Quality" in the County's Initial Study Assessment Guidelines.

4.9.2.2 Project Impacts and Mitigation Measures

Threshold 1:	Would the project individually or cumulatively degrade the quality of surface water causing it to exceed water quality objectives as contained in Chapter 3 of the three Basin Plans?
Threshold 2:	Would the project directly or indirectly cause storm water quality to exceed water quality objectives or standards in the applicable MS4 Permit or any other NPDES Permits?

IMPACT WQ-1 CONSTRUCTION AND OPERATION OF THE PROPOSED PROJECT WOULD INCREASE CONTAMINANTS IN STORMWATER RUNOFF DUE TO GROUND DISTURBANCE AND CHANGES IN GROUND COVER. HOWEVER, WITH REGULATORY COMPLIANCE, PROJECT IMPACTS TO SURFACE WATER QUALITY FROM CONSTRUCTION AND OPERATION OF THE PROJECT WOULD BE LESS THAN SIGNIFICANT.

Construction

As stormwater flows over a construction site, it can pick up sediment, debris, and chemicals, and transport them to receiving water bodies. Temporary site preparation, grading, and building construction activities associated with the project may result in soil erosion. If precautions are not taken to contain contaminants, construction activities could result in contaminated stormwater runoff entering nearby surface waters including the nearby Arroyo Las Posas. Construction activities could also affect water quality in the event of an accidental fuel or hazardous materials leak or spill.

The project site is located in unincorporated Ventura County. The project is therefore subject to the Ventura County MS4 Permit (NPDES No. CAS004002), which provides compliance with the *California State Construction General Permit* (Order No. 2009-2009-DWQ). Under the conditions of the permit, the project applicant would be required to eliminate or reduce non-stormwater discharges to waters of the U.S., develop and implement a SWPPP for project construction activities, and perform inspections of the stormwater pollution prevention measures and control practices to ensure conformance with the site SWPPP. As required by the Ventura County Stormwater Program, which implements the Ventura County MS4 Permit, the project would implement BMPs to prohibit the entry of pollutants from the construction site into the storm drain system during construction. The project would develop approximately 18.4 acres of the project site. Therefore, the project would be required to implement BMPs for construction sites greater than five acres in size, as identified in Table 8 of the MS4 Permit. BMPs would include sediment controls such as construction of a temporary sediment basin and control dam; a stabilized construction entrance/exit; material delivery and storage BMPs; spill prevention and control; concrete waste management; and sanitary/septic waste management.

In addition, the MS4 permit prohibits the discharge of materials other than stormwater and prohibits all discharges that contain a hazardous substance in excess of reportable quantities established at 40 Code of Federal Regulations (CFR) 117.3 or 40 CFR 302.4. The state permit also specifies that construction activities must meet applicable provisions of Sections 30 and 402 of the CWA. Conformance with Section 402 of the CWA would ensure that the project would not violate any water quality standards or waste discharge requirements. Similarly, compliance with construction-related BMPs and/or the SWPPP would control and minimize erosion and siltation.

With regulatory compliance, temporary construction-related impacts to water quality objectives contained in Chapter 3 of the Los Angeles Basin Plan and the County's MS4 Permit would be less than significant.

Operation

The portion of the project site that would be developed under the proposed project is unpaved and currently in agricultural production. As described in detail in Section 2, *Project Description*, the proposed housing complex would be constructed in three phases. The CWWTF would be constructed as part of Phase 1 and would be expanded to accommodate the needs of the housing complex as additional apartments are constructed and occupied during Phases 2 and 3.

Implementation of the proposed project would increase impervious surface area on the site by approximately 469,000 square feet, which would increase the volume of stormwater runoff across the project site. The housing complex would be surrounded by a 29-foot-wide landscaped area along the western and eastern perimeters, which would serve as a buffer between the proposed housing complex and existing surrounding agricultural operations. The housing complex would include landscaped areas throughout totaling approximately 281,000 square feet.

As discussed in the Preliminary Hydrology Memo (Appendix I), the project would include two stormwater detention basins and stormwater biofiltration devices to capture stormwater runoff. The proposed detention basins are mapped in the Hydrology Exhibit in Appendix I. Stormwater detention basins are typically placed strategically to slow the movement of stormwater runoff across a site and control the rate and quality of stormwater runoff exiting a project site. Runoff from the area in Phase 1 and the western portions of Phases 2 and 3 would be directed toward a stormwater detention basin on the east side of the site. The remaining runoff from Phases 2 and 3 would be directed to a second detention basin on the east side of the site. Outflow from the basins would be released into the existing drainage channel along the west side of the site via storm drain diversion structures and channels. The project's detention basins would reduce post-construction peak runoff flows to current peak runoff flows (Jensen 2019). In addition, the 281,000 square feet of landscaped areas would infiltrate stormwater runoff and roof discharges.

On-site infiltration tests performed at the project site demonstrate that the infiltration rate is poor. Due to the poor infiltration rates, the Preliminary Hydrology Memo concludes that it would be infeasible to use infiltration methods to meet the County's MS4 requirements pertaining to stormwater runoff quality. Therefore, the proposed project would include stormwater biofiltration devices to treat stormwater runoff before it leaves the project site (Jensen 2019). Biofiltration systems operate by filtering diverted runoff through dense vegetation, followed by vertical filtration through physical filters. Specifically, the proposed project would install the Modular Wetlands system from Bio Clean, which is designed to remove pollutants through a combination of physical, chemical, and biological filtration processes. Trash, sediment, and debris are separated before entering the pre-filter boxes. The filtration system removes pollutants such as total dissolved solids (TDS), heavy metals, nutrients, hydrocarbons, and bacteria from diverted stormwater runoff, which is then directed into the storm drain system (Bio Clean 2020). The biofiltration system installed with the proposed project would remove pollutants from stormwater runoff before it enters the storm drain system and would protect surface water quality off-site.

As required by the Ventura County MS4 Permit, the project applicant would submit a PCSMP to the County illustrating the post-construction stormwater control measures and BMPs implemented on-site. The PCSMP would include a maintenance plan in accordance with requirements of the *Ventura County Technical Guidance Manual for Stormwater Quality Control Measures*.

Based on the above, operation of the project would not directly or indirectly cause storm water quality to exceed water quality objectives or standards in the applicable MS4 Permit and impacts to surface water quality would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 1:	Would the project individually or cumulatively degrade the quality of surface water causing it to exceed water quality objectives as contained in Chapter 3 of the three Basin Plans?
Threshold 2:	Would the project directly or indirectly cause storm water quality to exceed water quality objectives or standards in the applicable MS4 Permit or any other NPDES Permits?

IMPACT WQ-2 RECYCLED WATER WOULD BE PRODUCED AT THE CWWTF AND BLENDED WITH LOCAL GROUNDWATER SUPPLIES FOR AGRICULTURAL IRRIGATION USES. THE INCORPORATION OF RECYCLED WATER INTO THE AREA'S EXISTING AGRICULTURAL IRRIGATION USES WOULD RESULT IN IMPROVED QUALITY OF THE APPLIED IRRIGATION WATER, WHICH WOULD RESULT IN IMPROVED SURFACE WATER QUALITY IN THE AREA. WITH REGULATORY COMPLIANCE, THE PROJECT'S IMPACTS TO SURFACE WATER QUALITY WOULD BE LESS THAN SIGNIFICANT.

Because the project site is outside the Camarillo Sanitary District service area, the project includes on-site wastewater treatment. The housing complex would include the construction and operation of a CWWTF on an approximately 5,000- to 7,000-square-foot area in the northwest corner of the project site. The on-site CWWTF would treat all wastewater generated by the housing complex. The CWWTF's treatment processes are detailed in Section 2, *Project Description*.

The CWWTF would be designed to treat wastewater generated on-site to meet Disinfected Tertiary Recycled Water requirements in accordance with California Code of Regulations (CCR) Title 22. Recycled water produced at the CWWTF would be beneficially reused for off-site agricultural irrigation. Currently, the adjacent orchards are irrigated with relatively low-quality groundwater pumped from a private well. If the proposed project is approved and built, higher-quality recycled water generated by the CWWTF would be blended with pumped groundwater to improve the quality of agricultural irrigation water (WREA 2019).

Excess recycled water and treated wastewater effluent not meeting recycled water quality standards would be dispersed through a series of underground seepage pits on the westerly side of the project site (WREA 2019). As discussed in Appendix G, in September 2019, seepage pit field tests were performed to calculate potential percolation rates on the project site. The study confirmed the feasibility of seepage pit performance for excess effluent from the CWWTF (Earth Systems Pacific 2019). The CWWTF's seepage pits would be located entirely underground, and would not be hydrologically connected to nearby surface waters. Consequently, the seepage pits would not adversely affect surface water quality.

As required by CCR Titles 17 and 22, the Health and Safety Code and Water Code, the proposed CWWTF would require an Engineering Report (i.e., a Title 22 Report) for "Production, Distribution and Use of Recycled Water" to the SWRCB for review and approval. The County's Building and Safety Division also has approval authority over the CWWTF and the Los Angeles RWQCB would regulate the operation of the facility. As required by water discharge requirements and water

reclamation requirements, constituents (pollutants) in the recycled water would be tested daily, weekly, and/or monthly to ensure the discharge is meeting the TMDLs for pollutants established under the CWA to protect the beneficial uses of receiving waters.

The Basin Plan includes WQOs for surface waters related to beneficial uses (Los Angeles RWQCB 2020). Beneficial uses for water in the project area are identified in Table 4.9-2. The project would comply with applicable regulations and implement BMPs to protect surface water quality and minimize impacts to beneficial uses of surface waters. For instance, the Basin Plan establishes maximum nitrogen concentrations of less than 10 milligrams per liter in discharged water, and the proposed CWWTF would use an extended aeration method with full tertiary treatment and disinfection to produce recycled water with nitrogen concentrations of less than ten milligrams per liter.

The proposed project's CWWTF would satisfy Basin Plan requirements and would not degrade surface water quality causing it to exceed WQOs as contained in Chapter 3 of the Basin Plan. Consequently, the proposed project would not conflict with or obstruct implementation of the Basin Plan, and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 3:	Would the project be inconsistent with the applicable General Plan Goals and Policies for "Water Resources – Surface Water Quality" in the County's Initial Study Assessment Guidelines?

IMPACT WQ-3 THE PROJECT WOULD BE CONSISTENT WITH THE APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would be consistent with the County General Plan goals and policies listed previously under Regulatory Setting. The project's consistency is analyzed in detail in Section 4.10, *Land Use and Planning*. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.9.2.3 Cumulative Impacts

The geographic scope for cumulative hydrology and water quality impacts is the Somis portion of the Calleguas Creek Watershed. In this area, water generally flows from east to west and downhill towards the Pacific Ocean. This geographic scope is appropriate for surface water quality because water quality impacts are localized and specific to the watershed in which the impact occurs. Cumulative development within this geographic scope includes the cumulative projects summarized in Table 3-1, all of which would be located in the Calleguas Creek Watershed.

Cumulative development would generally increase impermeable surface area in the Calleguas Creek Watersheds. Development would potentially increase pollutants in regional stormwater flows. However, cumulative development would also be required to adhere to all applicable state and local regulations designed to control erosion and protect water quality, including the NPDES *Construction General Permit*. All construction sites larger than one acre in size would require a SWPPP with BMPs, thereby reducing the risk of water degradation on- and off-site from soil erosion and other

pollutants. In addition, the County of Ventura's post-construction requirements for stormwater management would reduce the quantity of stormwater runoff that enters the storm drainage system and discharges to the Pacific Ocean from project sites in unincorporated Ventura County and the City of Camarillo.

Based on the above, cumulative impacts would be less than significant. Consequently, the proposed project would not have a cumulatively considerable contribution to a significant cumulative impact related to surface water quality.

4.10 Land Use and Planning

This section assesses potential land use consistency impacts associated with the proposed project, specifically in relation to the Ventura County General Plan's goals and policies and the County's Save Open Space and Agricultural Resources (SOAR) Ordinance.

4.10.1 Setting

4.10.1.1 Project Site

The project site is currently used for agricultural production, with ancillary residences and agricultural buildings located immediately south of Bell Ranch Road. The project site has a General Plan land use designation of Agricultural and a zoning designation of Agricultural Exclusive (AE). Uses permitted in the AE zone seek to preserve and protect agriculture and commercial agriculture uses. Farmworker housing is an allowed use in the AE zone pursuant to Section 8103-2.7 of the Ventura County Ordinance Code.

4.10.1.2 Regulatory Setting

Air Quality

Ventura County General Plan – Goals, Policies, Programs

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goals 1.2.1-1 and 1.2.1-2 and Policies 1.2.2-1 through 1.2.2-3 and 1.2.2-5 pertain to air quality.

- **Goals**
  - **1.2.1-1.** Diligently seek and promote a level of air quality that protects public health, safety, and welfare, and seek to attain and maintain the State and Federal Ambient Air Quality standards.
  - **1.2.1-2.** Ensure that any adverse air quality impacts, both long-term and short-term, resulting from discretionary development are mitigated the maximum extent feasible.
- **Policies**
  - **1.2.2-1.** Discretionary development that is inconsistent with the Air Quality Management Plan (AQMP) shall be prohibited, unless overriding considerations are cited by the decision-making body.
  - **1.2.2-2.** The air quality impacts of discretionary development shall be evaluated by use of the Guidelines for the Preparation of Air Quality Impact Analysis.
  - **1.2.2-3.** Discretionary development that would have a significant adverse air quality impact shall only be approved if it is conditioned with all reasonable mitigation measures to avoid, minimize, or compensate (offset) for the air quality impact. Developers shall be encouraged to employ innovative methods and technologies to minimize air pollution impacts.
  - **1.2.2-5.** Development subject to APCD permit authority shall comply with all applicable APCD rules and permit requirements, including the use of best available control technology (BACT) as determined by the APCD.

Draft Ventura County 2040 General Plan

Additionally, several Elements of the Draft Ventura County 2040 General Plan recognize the importance of achieving regional air quality objectives. The Draft Plan includes the following additional policies related to air quality:

CIRCULATION, TRANSPORTATION, AND MOBILITY ELEMENT

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

PUBLIC FACILITIES, SERVICES, AND INFRASTRUCTURE ELEMENT

- **Policy PFS-2.5: County Employee Trip Reduction.** The County shall encourage its employees to reduce the number and distance of single-occupancy vehicle work trips.
- **Policy PFS-2.6: County Alternative Fuel Vehicle Purchases.** The County shall review market-available technologies for alternative fuel vehicles and prioritize purchase of vehicles to reduce greenhouse gas emissions where economically feasible.

HAZARDS AND SAFETY ELEMENT

- **Policy HAZ-10.1: Air Pollutant Reduction.** The County shall strive to reduce air pollutant from stationary and mobile sources to protect human health and welfare, focusing efforts on shifting patterns and practices that contribute to the areas with the highest pollution exposures and health impacts.
- **Policy HAZ-10.2: Air Quality Management Plan Consistency.** The County shall prohibit discretionary development that is inconsistent with the most recent adopted AQMP, unless the Board of Supervisors adopts a statement of overriding considerations.
- **Policy HAZ-10.3: Air Pollution Control District Rule and Permit Compliance.** The County shall ensure that discretionary development subject to VCAPCD permit authority complies with all applicable APCD rules and permit requirements, including the use of Best Available Control Technology (BACT) as determined by the VCAPCD.

- **Policy HAZ-10.4: Engagement with Air Quality Management Plan.** When the VCAPCD updates the AQMP, the County shall actively engage continuously and throughout the process.
- **Policy HAZ-10.5: Air Pollution Impact Mitigation Measures for Discretionary Development.** The County shall work with applicants for discretionary development projects to incorporate bike facilities, solar water heating, solar space heating, incorporation of electric appliances and equipment, and the use of zero and/or near zero emission vehicles and other measures to reduce air pollution impacts and reduce greenhouse gas emissions.
- **Policy HAZ-10.6: Transportation Control Measures Programs.** The County shall continue to work with the VCAPCD and VCTC to develop and implement Transportation Control Measures (TCM) programs consistent with the AQMP to facilitate public transit and alternative transportation modes within the county.
- **Policy HAZ-10.7: Fuel Efficient County Vehicles.** When purchasing new County vehicles, the County shall give strong preference to fuel efficient vehicles, include the use of zero emission vehicles when feasible.
- **Policy HAZ-10.8: Alternative Transportation Modes.** The County shall promote alternative modes of transportation that reduce single-occupancy vehicle (SOV) travel and enhance "last-mile" transportation options to improve air quality.
- **Policy HAZ-10.9: Mitigation of Objectionable Odors.** The County shall require that discretionary development which will create objectionable odors that could affect a substantial number of people are appropriately mitigated. The project, pursuant to state law, shall be required to operate in accordance with the Rules and Regulations of the VCAPCD, with emphasis on Rule 51, Nuisance throughout the life of the permit.
- **Policy HAZ-10.11: Air Quality Assessment Guidelines.** In evaluating air quality impacts, the County shall consider total emissions from both stationary and mobile sources, as required by the California Environmental Quality Act. The County shall evaluate discretionary development for air quality impacts using the Air Quality Assessment Guidelines as adopted by the Ventura County Air Pollution Control District (APCD), except that emissions from APCD-permitted sources shall also be included in the analysis. The County shall revise the Initial Study Assessment Guidelines to implement this policy.
- **Policy HAZ-10.12: Conditions for Air Quality Impacts.** The County shall require that discretionary development that would have a significant adverse air quality impact shall only be approved if it is conditioned with all reasonable mitigation measures to avoid, minimize or compensate (offset) for the air quality impact. The use of innovative methods and technologies to minimize air pollution impact shall be encouraged in project design.

Agricultural Resources – Soils

Ventura County General Plan – Goals, Policies, Programs

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goal 1.6.1-1 and Policies 1.6.2-1 and 1.6.2-6 pertain to agricultural soils.

- **Goals**
  - **1.6.1-1.** Preserve and protect agricultural lands as a nonrenewable resource to assure the continued availability of such lands for the production of food, fiber, and ornamentals.

- **Policies**
  - **1.6.2-1.** Discretionary development located on land designated as Agricultural and identified as Prime Farmland or Farmland of Statewide Importance on the State's Important Farmland Inventory shall be planned and designed to remove as little land as possible from potential agricultural production and to minimize impacts on topsoil.
  - **1.6.2-6.** Discretionary development adjacent to Agricultural-designated lands shall not conflict with agricultural use of those lands.

SOAR Ordinance

The County's Ventura County Save Open space and Agricultural Resources (SOAR) Ordinance was initially adopted by the County Board of Supervisors in 1998. The SOAR Ordinance requires a majority vote by residents for development of land currently designated as Open Space, Agricultural, or Rural in the County General Plan. The project site is designated Agricultural in the County General Plan. In 2016, two new sections were added to SOAR to assist the agricultural industry by providing exemptions from a vote of the people for farmworker housing and processing of locally grown food. Further exemptions exist for affordable housing projects.

Additionally, the Ventura County Non-Coastal Zoning Ordinance (NCZO) allows for the development of farmworker housing complexes on parcels smaller than the prescribed minimum lot area on land zoned AE within or adjacent to a city Sphere of Influence, provided the remaining non-farmworker housing complex parcel is a minimum of 10 acres (Ventura County NCZO Section 8103-2.7). The project would include the continuation of agricultural use on a 17.93-acre continued agricultural use parcel on a project site zoned AE that is adjacent to the City of Camarillo (and its Sphere of Influence).

Biological Resources

Ventura County General Plan – Goals, Policies, Programs

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goal 1.5.1 and Policies 1.5.2-1 through 1.5.2-6 pertain to biological resources.

- **Goals**
  - **1.5.1.** Identify, preserve, and protect significant biological resources in Ventura County from incompatible land uses and development. Significant biological resources include endangered, threatened or rare species and their habitats, wetland habitats, coastal habitats, wildlife migration corridors that facilitate habitat connectivity and wildlife movement, and locally important species/communities.
- **Policies**
  - **1.5.2-1.** Discretionary development which could potentially impact biological resources shall be evaluated by a qualified biologist to assess impacts and, if necessary, develop mitigation measures.
  - **1.5.2-2.** Discretionary development shall be sited and designed to incorporate all feasible measures to mitigate any significant impacts to biological resources. If the impacts cannot be reduced to a less than significant level, findings of overriding considerations must be made by the decision-making body.
  - **1.5.2-3.** Discretionary development that is proposed to be located within 300 feet of a marsh, small wash, intermittent lake, intermittent stream, spring, or perennial stream (as

identified on the latest USGS 7.5-minute quad map), shall be evaluated by a County approved biologist for potential impacts on wetland habitats. Discretionary development that would have a significant impact on significant wetland habitats shall be prohibited, unless mitigation measures are adopted that would reduce the impact to a less than significant level; or for lands designated "Urban" or "Existing Community," a statement of overriding considerations is adopted by the decision-making body.

- **1.5.2-4.** Discretionary development shall be sited a minimum of 100 feet from significant wetland habitats to mitigate the potential impacts on said habitats. Buffer areas may be increased or decreased upon evaluation and recommendation by a qualified biologist and approval by the decision-making body. Factors to be used in determining adjustment of the 100-foot buffer include soil type, slope stability, drainage patterns, presence or absence of endangered, threatened or rare plants or animals, and compatibility of the proposed development with the wildlife use of the wetland habitat area. The requirement of a buffer (setback) shall not preclude the use of replacement as a mitigation when there is no other feasible alternative to allowing a permitted use, and if the replacement results in no net loss of wetland habitat. Such replacement shall be "in kind" (i.e. same type and acreage), and provide wetland habitat of comparable biological value. On-site replacement shall be preferred wherever possible. The replacement plan shall be developed in consultation with California Department of Fish and Game.
- **1.5.2-5.** The California Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, National Audubon Society, and the California Native Plant Society shall be consulted when discretionary development may affect significant biological resources. The National Park Service shall also be consulted regarding discretionary development within the Santa Monica Mountains or Oak Park Area.
- **1.5.2-6.** Based on the review and recommendation of a qualified biologist, the design and maintenance of road and floodplain improvements, including culverts and bridges shall incorporate all feasible measures to accommodate wildlife passage.

Cultural Resources – Historic

Ventura County General Plan – Goals, Policies, Programs

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goal 1.6.1-1 and Policies 1.6.2-1 and 1.6.2-6 pertain to historic resources.

- **Goals**
  - **1.8.1-1.** Identify, inventory, preserve, and protect the paleontological and cultural resources of Ventura County (including archaeological, historical, and Native American resources) for their scientific, educational, and cultural value.
  - **1.8.1-1.** Enhance cooperation with cities, special districts, other appropriate organizations, and private landowners in acknowledging and preserving the County's paleontological and cultural resources.
- **Policies**
  - **1.8.2-1.** Discretionary developments shall be assessed for potential paleontological and cultural resource impacts, except when exempt from such requirements by CEQA. Such assessments shall be incorporated into a Countywide paleontological and cultural resource data base.

- **1.8.2-2.** Discretionary development shall be designed or re-designed to avoid potential impacts to significant paleontological or cultural resources whenever possible. Unavoidable impacts, whenever possible, shall be reduced to a less than significant level and/or shall be mitigated by extracting maximum recoverable data. Determinations of impacts, significance and mitigation shall be made by qualified archaeological (in consultation with recognized local Native American groups), historical or paleontological consultants, depending on the type of resource in question.
- **1.8.2-3.** Mitigation of significant impacts on cultural or paleontological resources shall follow the Guidelines of the State Office of Historic Preservation, the State Native American Heritage Commission, and shall be performed in consultation with professionals in their respective areas of expertise.
- **1.8.2-4.** Confidentiality regarding locations of archaeological sites throughout the County shall be maintained in order to preserve and protect these resources from vandalism and the unauthorized removal of artifacts.
- **1.8.2-5.** During environmental review of discretionary development, the reviewing agency shall be responsible for identifying sites having potential archaeological, architectural or historical significance and this information shall be provided to the County Cultural Heritage Board for evaluation.
- **1.8.2-6.** The Building and Safety Division shall utilize the State Historic Building Code for preserving historic sites in the County.

Noise and Vibration

Ventura County General Plan – Goals, Policies, Programs

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goal 2.16.1 and Policies 2.16.2-1 through 2.16.2-3 pertain to noise and vibration.

- **Goals**
  - **2.16.1.** To protect the health, safety, and general welfare of County residents by elimination or avoidance of adverse noise impacts on existing and future noise sensitive uses.
- **Policies**
  - **2.16.2-1.** All discretionary development shall be reviewed for noise compatibility with surrounding uses. Noise compatibility shall be determined from a consistent set of criteria based on the standards listed below. An acoustical analysis by a qualified acoustical engineer shall be required of discretionary developments involving noise exposure or noise generation in excess of the established standards. The analysis shall provide documentation of existing and projected noise levels at on-site and off-site receptors, and shall recommend noise control measures for mitigating adverse impacts.
  - **2.16.2-2.** Discretionary development which would be impacted by noise, or generate project related noise which cannot be reduced to meet the standards prescribed in Policy 2.16.2-1, shall be prohibited. This policy does not apply to noise generated during the construction phase of a project.
  - **2.16.2-3.** The priorities for noise control shall be as follows:
    - Reduction of noise emissions at the source.
    - Attenuation of sound transmission along its path, using barriers, landforms modification, dense plantings, and the like.

- Rejection of noise at the reception point via noise control building construction, hearing protection or other means.

Public Health

Ventura County General Plan – Goals, Policies, Programs

The following Ventura County General Plan goals and policies are related to public health.

- **Goals**
  - **4.4.1-1.** Ensure the provision of adequate individual and public sewage/waste collection, treatment, and disposal facilities to meet the County's current and future needs in a manner which will protect the natural environment and ensure protection of the public's health, safety, and welfare.
- **Policies**
  - **4.4.2-1.** Community sewage treatment facilities and solid waste disposal sites shall be deemed consistent with the General Plan only if they are designated on the Public Facilities Map. On-site septic systems (i.e., individual sewage disposal systems), on-site wastewater treatment facilities, waste transfer stations, off-site waste treatment facilities, and on-site storage facilities are consistent with the General Plan if they conform to the goals, policies, and programs of the General Plan.
  - **4.4.2-2.** Any subdivision, or discretionary change in land use having a direct effect upon the volume of sewage, shall be required to connect to a public sewer system. Exceptions to this policy to allow the use of septic systems may be granted in accordance with County Sewer Policy. Installation and maintenance of septic systems shall be regulated by the County Environmental Health Division in accordance with the County's Sewer Policy, County Building Code, and County Service Area 32.
  - **4.4.2-3.** In order to reduce the need for additional wastewater treatment capacity, the County shall require new discretionary development to utilize water-conserving design features.
  - **4.4.2-5.** Waste treatment and disposal operations shall be designed and conducted in a manner that is compatible with surrounding land uses such that the potential impacts are mitigated to less than significant levels, or, where no feasible mitigation measures are available, a statement of overriding considerations consistent with CEQA shall be adopted. At the end of such operations, the site shall be restored to a use compatible with surrounding land uses.

Transportation

Draft Ventura County 2040 General Plan

The following policies from the Draft Ventura County 2040 General Plan Circulation, Transportation, and Mobility Element are applicable to the proposed project.

- **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.

- **Policy CTM-1.2: Projects with Significant Transportation Impacts.** County General Plan land use designation changes, zone changes, and discretionary development that would cause an individual (i.e., project-specific) or cumulative significant transportation impact based on Vehicle Miles Traveled (VMT) under the California Environmental Quality Act (CEQA) shall be prohibited unless:
  4. There are no feasible mitigation measures available that would reduce the impact to a less than significant level; and
  5. The County's decision-making body, after balancing, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of the project against its unavoidable transportation impact and any other environmental risks, determines that the benefits of the project outweigh the unavoidable adverse environmental impacts and adopt a statement of overriding considerations pursuant CEQA.
- **Policy CTM-1.3: County Level of Service (LOS) Standards.** The County shall maintain LOS standards for use as part of the County's transportation planning including the traffic impact mitigation fee program, and the County's review and consideration of proposed land use legislation and discretionary development. For purposes of County transportation planning and review and consideration of proposed land use legislation and discretionary development, the County shall use the following minimum acceptable Level of Service (LOS) for road segment and intersection design standards within the Regional Road Network and all other County-maintained roadways:
  g. LOS 'C' for all Federal functional classification of Minor Collector (MNC) and Local roadways (L); and
  h. LOS 'D' for all Federal functional classifications except MNC and L, and Federal and State highways in the unincorporated area, except as otherwise provided in subparagraph (c and d;
  i. LOS 'E' for State Route 33 between the northerly end of the Ojai Freeway and the city of Ojai, Santa Rosa Road, Moorpark Road north of Santa Rosa Road, State Route 34 north of the city of Camarillo, and State Route 118 between Santa Clara Avenue and the city of Moorpark;
  j. LOS 'F' for Wendy Drive between Borchard Drive to Lois Avenue; and
  k. The LOS prescribed by the applicable city for all federal highways, state highways, city thoroughfares and city-maintained local roads located within that city, if the city has formally adopted and is implementing a General Plan policy, ordinance, or a reciprocal agreement with the County regarding development in the city that is intended to improve the LOS of County-maintained local roads and federal and state highways located within the unincorporated area of the county.
  l. At any intersection between two or more roads, each of which has a prescribed minimum acceptable LOS, the lower LOS of the roads shall be the minimum acceptable LOS for that intersection.
- **Policy CTM-1.4: Level of Service (LOS) Evaluation.** County General Plan land use designation changes and zone changes shall be evaluated for their individual (i.e., project-specific) and cumulative effects, and discretionary developments shall be evaluated for their individual

effects, on Level of Service (LOS) on existing and future roads, to determine whether the project:

a. Would cause existing roads within the Regional Road Network or County-maintained roadways that are currently functioning at an acceptable LOS to function below an acceptable LOS;

b. Would add traffic to existing roads within the Regional Road Network or County-maintained roadways that are currently functioning below an acceptable LOS; and

c. Could cause future roads planned for addition to the Regional Road Network or County maintained roadways to function below an acceptable LOS.

d. The Level of Service (LOS) evaluation shall be conducted based on methods established by the County.

- **Policy CTM-1.5: Projects with Unacceptable Level of Service (LOS).**

1. County General Plan land use designation changes and zone changes that would cause any cumulative unacceptable LOS as determined pursuant to Policies CTM-1.3 and CTM-1.4 shall be prohibited unless the Board of Supervisors imposes all feasible conditions of approval to address all unacceptable LOS effects and, after balancing, as applicable, the project's economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, against the project's unacceptable LOS effects, determines that the benefits of the project outweigh the project's unacceptable LOS effects.
2. County General Plan land use designation changes, zone changes, and discretionary development that would individually (i.e., project-specific) cause an unacceptable LOS effect as determined pursuant to Policies CTM-1.3 and CTM-1.4 shall be prohibited unless the improvements to the roadway and intersections are included in the Public Works Agency, Transportation Department Strategic Master Plan with a funding mechanism identified and the project is conditioned on the payment of a fee proportional to the project's fair share of unacceptable LOS effects.
3. The following are exempt from this Policy:
    a. Farmworker Housing Complexes and other housing exclusively for lower-income households. Affordable housing developments, pursuant to Article 16 of the Non-Coastal Zoning Ordinance, where such developments are served by roads that are currently operating at LOS "E" or better;
    b. Additional dwellings and lots on Cultural Heritage Sites as permitted in the Non-Coastal Zoning Ordinance;
    c. Agriculture and Agricultural Operations as permitted in the Coastal and Non-Coastal Zoning Ordinances, where such developments are served by roads that are currently operating at LOS "E" or better;
    d. The unacceptable LOS exists on a City-maintained road or federal or state highway located within a city unless the applicable city has formally adopted and is implementing a general plan policy, ordinance, or a reciprocal traffic impact mitigation fee agreement with the County regarding development in the city that is intended to improve the LOS of County-maintained local roads and federal and state highways located within the unincorporated area of the county;
    e. Allow LOS "F" for Wendy Drive and maintain as two-lane road; and
    f. If the LOS effects of a County-approved Specific/Area Plan are determined acceptable pursuant to Policies CTM-1.3 and CTM-1.4, the LOS effects of any subsequent

development that is consistent with the approved Specific/Area Plan shall be exempt from this Policy.

- **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.
- **Policy CTM-2.3: County Road Access.** The County shall require discretionary development with access onto a County road to have the access point(s) designed and built to County standards.
- **Policy CTM-2.18: Complete Streets Standards in Existing Communities.** The County shall require discretionary development in designated Existing Communities to construct roadways to urban standards and Complete Streets principles, including curb, gutter, sidewalks, and bike lanes when there is a nexus for improvement. The County shall rely on the guidelines and design standards for Complete Streets design established by the California Manual on Uniform Traffic Control Devices (CAMUTCD), Caltrans in the Highway Design Manual, and Complete Streets Guidelines (pursuant to Deputy Directive-64-R2), Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO).
- **Policy CTM-2.20: Safe Pedestrian Crossings.** The County shall improve pedestrian safety at intersections and mid-block locations in Existing Communities through approved features consistent with the California Manual on Uniform Traffic Control Devices (CAMUTCD), Highway Design Manual, Federal Highway Administration, American Association of State Highway and Transportation Officials (AASHTO), and the National Cooperative Highway Research Program Report 498 (Application of Pedestrian Crossing Treatments for Streets and Highways).
- **Policy CTM-2.27: Discretionary Development and Conditions of Approval to Minimize Traffic Impacts.** The County shall require that discretionary development be subject to permit conditions of approval, where feasible, to minimize traffic impacts by incorporating pedestrian and bicycle pathways, bicycle racks and lockers, ridesharing programs, transit improvements (bus turnouts, shelters, benches), and/or transit subsidies for employees or residents of the proposed development.
- **Policy CTM-3.5: Bicycle Routes in Rural Areas.** The County shall plan for bicycle network connectivity in rural, agricultural, and open space areas in a way that supports and complements business and agricultural activities in those areas.
- **Policy CTM-3.10: Bicycle Storage Facilities.** The County shall require adequate bicycle storage facilities (e.g., bicycle racks, lockers) for discretionary development as determined by allowable land uses at a given site.
- **Policy CTM-6.3: Permeable Pavement.** As part of new roadway planning and design as part of discretionary development, the County shall promote the use of permeable paving and other passive drainage features such as bioswales to prevent flooding, particularly in urban areas.
- **Policy CTM-6.5 Electric Vehicle Charging Stations.** The County shall support the installation of electric vehicle charging stations, where feasible, at County facilities, parking lots, park-and-ride lots, truck stops, and new development.

Waste Treatment and Disposal Facilities – Solid Waste Facilities

Ventura County General Plan – Goals, Policies, Programs

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goals 4.4.1-1 and 4.4.1-2 and Policies 4.4.2-1, 4.4.1-4, and 4.4.1-6 pertain to solid waste facilities. However, Policies 4.4.2-1 and 4.4.2-4 are not applicable to the proposed project as those policies pertain to projects that are community sewage or solid waste facilities.

- **Goals**
  - **4.4.1-1.** Ensure the provision of adequate individual and public sewage/waste collection, treatment, and disposal facilities to meet the County's current and future needs in a manner which will protect the natural environment and ensure protection of the public's health, safety, and welfare.
  - **4.4.1-2.** Ensure continuous waste disposal capacity to meet the County's current and projected waste disposal needs.
- **Policies**
  - **4.4.2-6.** Applicants for discretionary development shall be encouraged to employ practices that reduce the quantities of wastes generated and shall be requested to engage in recycling activities to further reduce the volume of waste disposed of in landfills.

Water Resources – Surface Water Quality

Ventura County General Plan – Goals, Policies, Programs

Per the County's Initial Study Assessment Guidelines, Ventura County General Plan Goals 1.3.1-1 through 1.3.1-3 and 1.3.1-6 and Policies 1.3.2-1, 1.3.2-2, 1.3.2-4, 1.3.2-6, and 1.3.2-10 pertain to surface water quality. However, Policies 1.3.2-6 and 1.3.2-10 are not applicable to the proposed project as those policies pertain to use of Santa Clara River and new golf courses, respectively.

- **Goals**
  - **1.3.1-1.** Inventory and monitor the quantity and quality of the County's water resources.
  - **1.3.1-2.** Effectively manage the water resources of the County by adequately planning for the development, conservation, and protection of water resources for present and future generations.
  - **1.3.1-3.** Maintain and, where feasible, restore the chemical, physical, and biological integrity of surface and groundwater resources.
  - **1.3.1-6.** Promote reclamation and reuse of wastewater for recreation, irrigation and to recharge aquifers.

- **Policies**
  - **1.3.2-1.** Discretionary development which is inconsistent with the goals and policies of the County's Water Management Plan (WMP) shall be prohibited, unless overriding considerations are cited by the decision-making body.
  - **1.3.2-2.** Discretionary development shall comply with all applicable County and State water regulations.
  - **1.3.2-4.** Discretionary development shall not significantly impact the quantity or quality of water resources within watersheds, groundwater recharge areas, or groundwater basins.

4.10.2 Impact Analysis

4.10.2.1 Significance Thresholds

Impacts related to land use would be potentially significant if the proposed project would:

1. Be inconsistent with the applicable General Plan goals and policies for each of the analyzed issue areas in the County's Initial Study Assessment Guidelines.

4.10.2.2 Project Impacts and Mitigation Measures

Threshold 1:	Would the project be inconsistent with the applicable General Plan goals and policies for "Air Quality" in the County's Initial Study Assessment Guidelines?

IMPACT LU-1 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES FOR AIR QUALITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would not discourage the County from implementing applicable goals related to air quality, including "attain[ing] and maintain[ing] the State and Federal Ambient Air Quality standards" (Goal 1.2.1-1). Additionally, although project-related impacts would be less than significant, Mitigation Measure AQ-1 is recommended to further reduce construction emissions of ROC and NO_X in accordance with VCAPCD guidance, which is in compliance with Goal 1.2.1-2 and Policy 1.2.2-3 (to mitigate adverse air quality impacts to the maximum extent feasible). The project is consistent with the VCAPCD's AQMP and applicable rules and permit requirements (Policies 1.2.2-1 and 1.2.2-5) and the project's air quality impacts were evaluated based on applicable County guidelines (Policy 1.2.2-2).

With implementation of state and County regulations and policies outlined in Section 4.1, *Air Quality*, the project would be consistent with the General Plan goals and policies pertaining to air quality. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 2:	Would the project be inconsistent with the applicable General Plan goals and policies for "Agricultural Resources – Soils" in the County's Initial Study Assessment Guidelines?

IMPACT LU-2 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES FOR AGRICULTURAL RESOURCES RELATED TO SOILS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would "preserve and protect agricultural lands…to assure the continued availability of such lands for the production of food, fiber, and ornamentals" (Goal 1.6.1-1) by including a 17.93-acre continued agricultural use parcel on the project site for continued agricultural crop production. Although the project would include development on Important Farmland and land designated as Agricultural by the General Plan, the project would also comply with Policy 1.6.2-1 because project has been designed "to remove as little land as possible from potential agricultural production and to minimize impacts on topsoil." In addition, the proposed housing complex have been designed to minimize potential "conflict with agricultural use of those lands" with the use of proposed landscaped buffers and parking lots between the proposed apartment buildings and adjacent agricultural fields (Policy 1.6.2-6).

The Ventura County NCZO allows for the development of farmworker housing complexes on parcels smaller than the prescribed minimum lot area on land zoned AE within or adjacent to a city Sphere of Influence, provided the remaining non-farmworker housing complex parcel is a minimum of 10 acres (Ventura County NCZO Section 8103-2.7). The project would include the continuation of agricultural use on a 17.93-acre continued agricultural use parcel on a project site zoned AE that is adjacent to the City of Camarillo (and its Sphere of Influence).

With implementation of state and County regulations outlined in Section 4.2, *Agricultural Resources – Soils*, the project would be consistent with the General Plan goals and policies pertaining to agricultural soils. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 3:	Would the project be inconsistent with the County's Save Open Space and Agricultural Resources (SOAR) Ordinance?

IMPACT LU-3 THE PROJECT WOULD BE CONSISTENT WITH THE COUNTY'S SAVE OPEN SPACE AND AGRICULTURAL RESOURCES (SOAR) ORDINANCE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The purpose of the SOAR initiative is to protect open space and agricultural land by requiring a majority vote by residents before those areas can be re-designated and zoned for development.

The project site is in the Agricultural Exclusive 40-acre minimum lot size (AE-40 ac) zone and has an "Agricultural" General Plan land use designation. The purpose of this zone and designation is to preserve and protect commercial agricultural lands as a limited and irreplaceable resource, to preserve and maintain agriculture as a major industry in Ventura County and to protect these areas from the encroachment of non-related uses which, by their nature, would have detrimental effects upon the agricultural industry (see General Plan Land Use Designations Goals and Policies §3.2.1(4) [County of Ventura 2019] and NCZO §8104-1.2 [County of Ventura 2020]).

The proposed project includes a request for a subdivision of the existing parcel into four parcels, three of which would be developed for farmworker housing (approximately 18.5 acres) and one of which would remain in agricultural production (approximately 17.9 acres). The project site is located within the Sphere of Influence of the City of Camarillo. NCZO Section 8103-2.7 and General Plan Policy 3.1.2(6) permit the creation of parcels of less than the prescribed minimum lot area (e.g., 40 acres) to accommodate Farmworker Housing Complexes on land zoned AE within or adjacent to a City's Sphere of Influence, provided the remaining non-farmworker housing complex parcel is a minimum of 10 acres. Because the proposed project is consistent with both the General Plan and the NCZO, a General Plan Amendment and rezoning are not required. Therefore, the project is consistent with SOAR.

SOAR also identified that farmworker housing is a compatible use within the Agricultural designation. Section 1 (Findings and Purposes) (J) states:

> The purpose of this initiative is to continue ensure that Agricultural and Open Space lands are not prematurely or unnecessarily converted to other more intensive development uses incompatible with the purpose of the Agricultural, Open Space and Rural land use designations. Thus, this initiative seeks to further Agricultural, Open Space and Rural objectives, which could include, for example, adequate farm worker housing.

There are several exemptions in SOAR related to the construction of farmworker housing, which would authorize the Board of Supervisors, without a vote of the people, to process an application to redesignate lands that are designated Agricultural (see SOAR Section 2[g]). However, this provision in SOAR cannot be applied to the proposed project as a Farmworker Housing Complex is a use that is consistent with both the General Plan and the NCZO and does not require a redesignation.

Because the project involves the development of affordable farmworker housing, the proposed project would not require inclusion on the ballot for approval by the majority of voters, as set forth in the County's SOAR Ordinance. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 4:	Would the project be inconsistent with the applicable General Plan goals and policies for "Biological Resources" in the Initial Study Assessment Guidelines?

IMPACT LU-4 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES FOR BIOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would not discourage the County from "identify[ing], preserv[ing], and protect[ing] significant biological resources in Ventura County from incompatible land uses and development" (Goal 1.5.1). The project could result in significant impacts to nesting birds if such are present on or near the project site during project construction, and the project would require implementation of federal, state, and County laws and regulations to minimize potential impacts to nest birds. Therefore, the project would comply with Policies 1.5.2-1 and 1.5.2-2. The project would comply with County requirements related to water features (Policy 1.5.2-3). The project would impact potential jurisdictional waters but not significant wetland habitats; therefore, the project would be in compliance with Policy 1.5.2-4. In addition, the project would not impact sensitive plant communities or special-status species; therefore, the project would be consistent with Policy 1.5.2-5. The project may require a culvert for the off-site portion of the eastern driveway; the culvert

would be relatively small in length and diameter and would not affect wildlife passage, and would be in compliance with Policy 1.5.2-6.

With implementation of federal, state, and County laws and regulations outlined in Section 4.3, *Biological Resources*, as well as Mitigation Measure BIO-3, the project would be consistent with the General Plan goals and policies pertaining to biological resources. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 5:	Would the project be inconsistent with the applicable General Plan goals and policies for "Cultural Resources – Historic" in the County's Initial Study Assessment Guidelines?

IMPACT LU-5 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES FOR HISTORIC CULTURAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would not preclude the County from implementing goals applicable to historic resources, including "identify[ing], inventory, preserv[ing], and protect[ing]…cultural resources of Ventura…for their scientific, educational, and cultural value" (Goal 1.8.1-1) and "enhance[ing] cooperation with cities, special districts, other appropriate organizations, and private landowners in acknowledging and preserving the County's…cultural resources" (Goal 1.8.1-2). With completion of the Cultural Resources Assessment (Appendix E), the project is in compliance with Policies 1.8.2-1 through 1.8.2-6.

With implementation of state and County regulations outlined in Section 4.4, *Cultural Resources – Historic*, the project would be consistent with the General Plan goals and policies pertaining to historic resources. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 6:	Would the project be inconsistent with the applicable General Plan goals and policies for "Noise and Vibration" of the County's Initial Study Assessment Guidelines?

IMPACT LU-6 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES FOR NOISE AND VIBRATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would help meet the County its Goal 2.16.1 "to protect the health, safety, and general welfare of County residents by elimination or avoidance of adverse noise impacts on existing and future noise sensitive uses" as discussed previously in this section. Noise compatibility would occur between the proposed housing complex and adjacent uses, including Rancho Campana High School and Camarillo Public Library (Policy 2.16.2-1). Similarly, the proposed project's operational noise would not exceed the County's noise significance thresholds, as previously described in this section (Policy 2.16.2-2). Because mitigation is not required for the project, the noise control priorities presented in Policy 2.16.2-3 are not applicable to the proposed project.

With implementation of County regulations outlined in Section 4.5, *Noise and Vibration*, the project would be consistent with the General Plan goals and policies pertaining to noise and vibration. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 7:	Would the project be inconsistent with the applicable General Plan goals and policies for "Public Health" in the County's Initial Study Assessment Guidelines?

IMPACT LU-7 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES FOR PUBLIC HEALTH. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The County's Initial Study Assessment Guidelines does not list any specific public health County General Plan goals or policies with which a project should be consistent. Nonetheless, the project would be consistent with the County General Plan goals and policies listed previously under Regulatory Setting for Public Health. The proposed CWWTF would "ensure the provision of adequate individual…sewage/waste collection, treatment, and disposal facilities meet…current and future needs in a manner which [would] protect the natural environment and ensure protection of the public's health, safety, and welfare" (Goal 4.4.1-1) because the project would be in compliance with applicable federal, state, and local health and safety requirements for the handling, storage, transportation, and disposal of hazardous materials, as discussed under Impact PH-1. The project would be consistent with the applicable General Plan goals and policies, as discussed throughout Section 4 of this EIR (Policy 4.4.2-1). The project would include a CWWTF in accordance with the County Sewer Policy and County Building Code (Policy 4.4.2-2). The project would also comply with Policy 4.4.2-3 because the housing complex would utilize water-conserving design features. As discussed throughout this EIR, the CWWTF would not result in significant impacts (Policy 4.4.2-5).

With implementation of state and County regulations outlined in Section 4.6, *Public Health*, the project would be consistent with applicable General Plan goals and policies. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 8:	Would the project be inconsistent with the applicable General Plan goals and policies for "Transportation & Circulation" in the County's Initial Study Assessment Guidelines?

IMPACT LU-8 THE PROJECT WOULD BE CONSISTENT WITH APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES FOR TRANSPORTATION AND CIRCULATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As analyzed in Section 4.7, *Transportation*, and in the project-specific Traffic Study (ATE 2020; Appendix H), the project would comply with the VMT standards and County LOS, road access, complete streets, safe pedestrian crossings, and bicycle storage facilities standards cited in the County's Initial Study Assessment Guidelines related to Transportation.

With implementation of state and County standards and regulations outlined in Section 4.7, *Transportation*, the project would be consistent with the General Plan goals and policies pertaining to transportation. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 9:	Would the project be consistent with the applicable General Plan goals and policies for "Waste Treatment & Disposal Facilities – Solid Waste Facilities" in the County's Initial Study Assessment Guidelines?

IMPACT LU-9 THE PROJECT WOULD BE CONSISTENT WITH THE APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES FOR SOLID WASTE FACILITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would not discourage the County from implementing applicable goals related to surface water quality, including "ensur[ing] adequate individual and public sewage/waste collection, treatment, and disposal facilities to meet the County's current and future needs" (Goal 4.4.1-1) and "ensur[ing] continuous waste disposal capacity to meet the County's current and projected waste disposal needs" (Goal 4.4.1-2). The project applicant would also inform new residents about the County's practices to reduce wastes generated, including wastewater. Regardless, the proposed housing complex would treat all project-generated wastewater at the proposed CWWTF. Therefore, the project would not contribute to wastewater to County-treated wastewater generation.

With implementation of state and County laws and regulations outlined in Section 4.8, *Waste Treatment – Solid Waste Facilities*, the project would be consistent with General Plan goals and policies pertaining to solid waste facilities. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Threshold 10:	Would the project be inconsistent with the applicable General Plan goals and policies for "Water Resources – Surface Water Quality" in the County's Initial Study Assessment Guidelines?

IMPACT LU-10 THE PROJECT WOULD BE CONSISTENT WITH THE APPLICABLE VENTURA COUNTY GENERAL PLAN GOALS AND POLICIES FOR SURFACE WATER QUALITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would not discourage the County from implementing applicable goals related to surface water quality, including "inventory and monitor[ing of] the quantity and quality of the County's water resources" (Goal 1.3.1-1) and "effectively manag[ing] the water resources of the County by adequately planning for…water resources for present and future generations" (Goal 1.3.1-2). The project would also help the County to meet Goals 1.3.1-3 and 1.3.1-6 because the proposed CWWTF would treat project-generated wastewater to meet Disinfected Tertiary Recycled Water requirements in accordance with CCR Title 22. Higher-quality recycled water generated by the CWWTF would be blended with pumped groundwater to improve the quality of agricultural irrigation water (WREA 2019). The project would be consistent with the goals and policies of the County's Water Management Plan (Policy 1.3.2-1) and would comply with all applicable state and County water regulations (Policy 1.3.2-2), as previously described in this section. Additionally, the

project would "not significantly impact the quantity or quality of water resources within watersheds, groundwater recharge areas, or groundwater basins" (Policy 1.3.2-2).

With implementation of federal, state, and County regulations and requirements outlined in Section 4.9, *Water Resources – Surface Water Quality*, the project would be consistent with General Plan policies pertaining to surface water quality. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

4.10.2.3 Cumulative Impacts

Table 3-1 in Section 3, *Environmental Setting,* identifies currently planned and pending projects in Ventura County. Project PL15-0014, located at 3100 Somis Road in Camarillo, involves a General Plan amendment to change the land use designation from Agricultural (40-acre minimum) to Existing Community, and a rezone of the same area from Agricultural Exclusive (AE 40) to Limited Industrial (M2) for the continued use, operation, and expansion of a wholesale lumber yard. The Ventura County General Plan amendment must be approved by a majority countywide vote pursuant to the County's SOAR ordinance. No other planned or pending project in Table 3-1 would require a Ventura County General Plan amendment or SOAR vote.

The proposed project would be consistent with all General Plan goals and policies. As discussed above, although project-related impacts would be less than significant, Mitigation Measure AQ-1 is recommended to further reduce construction emissions of ROC and NO_X in accordance with VCAPCD guidance, which is in compliance with Goal 1.2.1-2 and Policy 1.2.2-3. As also discussed above, the proposed project would not require a vote under SOAR.

Planning and pending development would be subject to Ventura County General Plan goals and policies and, as noted above, the proposed project would be consistent with all applicable General Plan goals and policies. Therefore, the project would not make a substantial contribution to cumulative land use impacts and cumulative impacts would be less than significant.

4.11 Less Than Significant Environmental Effects

Sections 4.1 through 4.10 of this EIR focus on potentially significant impacts that may result from project implementation. This section discusses the remaining environmental issue areas included in the County's Initial Study Assessment Guidelines (County 2011), of which the proposed project would result in less than significant impact or no impact. In addition, this section of the EIR discusses energy, per Appendix G of the CEQA Guidelines.

- **Aesthetics/Scenic Resources.** The project site is not located in or near a Scenic Resource Area as depicted on the County's Resource Protection Map. Therefore, the project would not physically alter scenic resources and would not substantially obstruct, degrade, or obscure a scenic vista. No impact to scenic resources would occur.
- **Forestry Resources.** The project site is not located in or near forestland or timberland. Therefore, no impact to forestry resources would occur.
- **Cultural Resources – Archaeological.** Section 4.4, *Cultural Resources – Historic*, includes a discussion of the prehistoric context, ethnographic context, and historic context, as well as the records search results from the California Historical Resources Information System (CHRIS) was conducted at South Central Coastal Information Center (SCCIC) at California State University, Fullerton. The SCCIC records search identified 14 previously conducted cultural resources studies within a 0.5-mile radius of the project site. The cultural resources records search identified three previously recorded cultural resources within a 0.5-mile radius of the project site, none of which are located within the project site (see Section 4.4 of this EIR). Of the recorded resources in the records search radius, two are Native American-origin archaeological resources in close proximity to the current project site.

  A qualified archaeologist conducted a pedestrian survey of the project site on April 28, 2020. The majority of the project site has been previously disturbed from grading, building development, and agricultural activities. The pedestrian field survey identified three isolated shell fragments in the southern portion of the project site and intermixed modern and historic-era refuse along the eastern boundary of the project site. The isolated shell fragments were not found in association with any other cultural materials or soil discoloration and are therefore not considered cultural resources. Based on the size and nature of the historic and modern refuse, the deposit is likely related to episodic refuse dumping that occurred during the construction and maintenance of the culvert. Episodic refuse dumping is a common pattern observed in rural communities before the health and safety laws of the 1960s and 1970s. The refuse was not formally recorded as a cultural resource due to heavy modern disturbances and the undiagnostic fragmented nature of the find. Native American outreach identified the project site as sensitive for archaeological resources and Patrick Tumamait of the Barbareño/Ventureño Band of Mission Indians recommended Native American monitoring during all ground disturbance associated with the project.

  Based on the proximity of the project to a freshwater source (Arroyo Las Posas), the presence of nearby archaeological resources, and the results of Native American outreach, the area is considered sensitive for archaeological resources. Therefore, archaeological and Native American monitoring during project ground disturbance during construction activities. With the inclusion of archaeological and Native American monitoring during project construction, impacts to archaeological resources would be less than significant.

- **Energy.** The proposed project would require the use of petroleum and electricity for construction and operation; the project would not require the use of natural gas. Electricity would be provided by SCE. According to the California Energy Commission (CEC), in 2018, the County of Ventura consumed approximately 5,539.4 gigawatts (GWh) of electricity (CEC 2019).

  Project construction would require energy resources primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use during construction activities would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, construction contractors would be required to comply with the provisions of 13 California Code of Regulations (CCR) Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes to minimize unnecessary fuel consumption. Construction equipment would also be subject to the U.S. EPA Construction Equipment Fuel Efficiency Standard (40 Code of Federal Regulations [CFR] Parts 1039, 1065, and 1068), which would minimize inefficient fuel consumption. Therefore, project construction would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

  Project operation would consume approximately 1.5 GWh of electricity and per year, which represents less than 0.03 percent of the 5,530 GWh from the County's annual electricity use. The project would comply with standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. CALGreen (as codified in CCR Title 24, Part 11) requires implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy efficiency performance standards set by the CEC. The standards are updated every three years, and each iteration increases energy efficiency standards. For example, according to the CEC, residences built with the 2019 standards will use about seven percent less energy due to energy efficiency measures (CEC 2018). Furthermore, use of nonrenewable energy resources would decline over time as the electricity generated by renewable resources provided by SCE continues to increase to comply with state requirements through Senate Bill 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

  Based on the above, the project would not result in wasteful or unnecessary energy consumption, and impacts would be less than significant.

- **Geology/Soils.** The project site is not within a state-designated Alquist-Priolo Special Fault Study Zone (Earth Systems Pacific 2019; Appendix J). Additionally, according to the County's Hazards Protection Map, the project site in not within a County-designated Earthquake Fault Hazard Zone (County 2020b). The project site and surrounding area are subject to moderate to strong ground shaking from seismic events due to nearby fault systems (Earth Systems Pacific 2019; Appendix J).

  The project would be constructed in accordance with California Building Code (CBC) guidelines. The CBC includes several seismic design parameters that are influenced by the geographic site location with respect to active and potentially active faults, and with respect to subsurface soil or rock conditions. Because of mandated standards included in the CBC and the County of

Ventura Building Code related to geologic hazards, the project would result in less than significant impacts to geology and soils.

- **Greenhouse Gas (GHG) Emissions.** The Ventura County Air Pollution Control District has not adopted a specific threshold of significance for GHG emissions associated with land use development projects. The majority of individual projects do not generate sufficient GHG emissions to create significant project-specific environment effects. However, the environmental effects of a project's GHG emissions can contribute incrementally to cumulative environmental effects that are significant, contributing to climate change, even if an individual project's environmental effects are limited (CEQA Guidelines Section 15064[h][1]). The issue of a project's environmental effects and contribution towards climate change typically involves an analysis of whether or not a project's contribution towards climate change is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]).

  Section 15064.4 of the CEQA Guidelines recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions.

  CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7[c]). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130[f]). As a note, the CEQA Guidelines were amended in response to Senate Bill 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

  Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Therefore, a lead agency can make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies and/or other regulatory strategies to reduce GHG emissions.

  Therefore, in the absence of any adopted numeric threshold, the significance of the project's GHG emissions are primarily evaluated based on CEQA Guidelines Section 15064.4(b) and the consideration of 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, the most directly applicable adopted regulatory

plans to reduce GHG emissions are the 2017 Climate Change Scoping Plan, the Southern California Association of Governments' (SCAG) 2016-2040 and 2020-2045 Regional Transportation Plans/Sustainable Communities Strategies (RTP/SCS), the County's current (2019) General Plan, and the County's Draft 2040 General Plan (2020a).

Consistency with Applicable Regulatory Plans. The project would be consistent with the California Air Resources Board's (CARB) 2017 Climate Change Scoping Plan, the Southern California Association of Governments' (SCAG) 2016–2040 RTP/SCS, the SCAG's 2020-2045 RTP/SCS,[6] the adopted 2019 County of Ventura General Plan, and the Draft Ventura County 2040 General Plan, as discussed below.

- *2017 Climate Change Scoping Plan*. The principal state plan and policy is the California Global Warming Solutions Act of 2006, first enacted by AB 32 and amended by SB 32. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020, and the quantitative goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. Pursuant to the SB 32 goal, the 2017 Scoping Plan was created to outline goals and measures for the state to achieve the reductions. The 2017 Scoping Plan's goals include reducing fossil fuel use and energy demand and maximizing recycling and diversion from landfills (CARB 2017). The project would be consistent with these goals through project design, which includes complying with the latest Title 24 Green Building Code and Building Efficiency Energy Standards and providing opportunities to reduce vehicle trips by including approximately 379 bicycle parking spaces, an on-site pedestrian walkway network, and on-site recreational amenities. Therefore, the project would be consistent with the 2017 Climate Change Scoping Plan.
- *2016-2040 RTP/SCS*. The SCAG 2016–2040 RTP/SCS is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by 8 percent below 2005 levels by 2020, 18 percent by 2035, and 21 percent by 2040. In March 2018, CARB adopted updated targets requiring a 19 percent decrease in GHG emissions from passenger cars for the SCAG region by 2035. The CARB targets were adopted after publication of the 2016 RTP/SCS; as a result, the updated targets have been incorporated into the 2020-2045 RTP/SCS, which is discussed further in the following subsection.

  In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2016-2040 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2016-2040 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use and per capita vehicle miles traveled (VMT). The project's consistency with the 2016-2040 RTP/SCS is discussed in Table 4.11-1. As shown therein, the proposed project would be consistent with the GHG emission reduction strategies contained in the 2016-2040 RTP/SCS.

[6] On May 7, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS (titled Connect SoCal) for federal transportation conformity purposes and will consider approval of the full plan and for all other purposes within 120 days of this date. Although the 2020-2045 RTP/SCS was not fully adopted at the time of this EIR (August 2020), this EIR provides an analysis of the project's consistency with the 2020-2045 RTP/SCS for full disclosure.

Table 4.11-1 Project Consistency with Applicable SCAG 2016-2040 RTP/SCS Strategies

Reduction Strategy	Project Consistency
Land Use Actions and Strategies	
Reflect the Changing Population and Demands The SCAG region, home to about 18.3 million people in 2012, currently features 5.9 million households and 7.4 million jobs. By 2040, the Plan projects that these figures will increase by 3.8 million people, with nearly 1.5 million more homes and 2.4 million more jobs. High Quality Transit Areas (HQTA) will account for three percent of regional total land, but will accommodate 46 percent and 55 percent of future household and employment growth respectively between 2012 and 2040. The 2016 RTP/SCS land use pattern contains sufficient residential capacity to accommodate the region's future growth, including the eight-year regional housing need. The land use pattern accommodates about 530,000 additional households in the SCAG region by 2020 and 1.5 million more households by 2040. The land use pattern also encourages improvement in the jobs-housing balance by accommodating 1.1 million more jobs by 2020 and about 2.4 million more jobs by 2040.	**Consistent.** The proposed project would involve construction of a multi-family housing complex for farmworkers with 100 percent affordable units that would allow farmworkers to live in close proximity to agricultural fields. Therefore, the project would accommodate additional household growth in proximity to job opportunities.
Focus New Growth Around Transit The 2016 RTP/SCS land use pattern reinforces the trend of focusing growth in the region's HQTAs. Concentrating housing and transit in conjunction concentrates roadway repair investments, leverages transit and active transportation investments, reduces regional life cycle infrastructure costs, improves accessibility, avoids greenfield development, and has the potential to improve public health and housing affordability. HQTAs provide households with alternative modes of transport that can reduce VMT and GHG emissions.	**Consistent.** The project site is not located in an HQTA; however, the 2016-2040 RTP/SCS assumes that 54 percent of new housing developed between 2012 and 2040 will occur outside of HQTAs. The proposed project is strategically located to provide affordable housing to local farmworkers so that they are able to live in close proximity to agricultural fields, which would reduce VMT and associated GHG emissions. Furthermore, the project site is approximately one mile south of the Somis Road/Rice Street stop for Ventura County Transportation Commission Route 77, which provides express bus service between Simi Valley and Ventura and includes stops at key transit hubs including the Camarillo Metrolink station.
Provide More Options for Short Trips 38 percent of all trips in the SCAG region are less than three miles. The 2016 RTP/SCS provides two strategies to promote the use of active transport for short trips. Neighborhood Mobility Areas are meant to reduce short trips in a suburban setting, while "complete communities" support the creation of mixed-use districts in strategic growth areas and are applicable to an urban setting.	**Consistent.** The proposed project includes farmworker housing within 0.25 mile of local-serving retail and restaurants, the Camarillo Public Library, Rancho Campana High School, and agricultural fields. The project also includes an on-site network of meandering pedestrian walkways, approximately 379 bicycle parking spaces, and recreational amenities including community centers, play fields, tot lots/playgrounds, a basketball court, and a community garden area. The project would connect to existing sidewalks along the southbound lane of Somis Road, and the project site is within 375 feet of existing Class II bicycle lanes along Las Posas Road and North Lewis Road. Therefore, the project would provide options to use active transport for short trips.

Reduction Strategy	Project Consistency
Support Local Sustainability Planning To implement the SCS, SCAG supports local planning practices that help lead to a reduction of GHG emissions. Sustainable Planning & Design, Zoning Codes, and Climate Action Plans are three methods that local agencies have been adopting and implementing to help meet the regional targets for GHG emission reductions outlined in the SCS.	**Consistent.** The project would support this /strategy because it would be consistent with the current County General Plan and the Draft 2040 General Plan, which includes the County's Draft Climate Action Plan (see Table 4.11-3 and Table 4.11-4, respectively).
Transportation Strategies	
Transit Since 1991, the SCAG region has spent more than $50 billion dollars on public transportation. This includes high profile investments in rail transit and lower profile, vital investments in operations and maintenance. Looking toward to 2040, the 2016 RTP/SCS maintains a significant investment in public transportation across all transit modes and also calls for new household and employment growth to be targeted in areas that are well-served by public transportation to maximize the improvements called for in the Plan.	**Consistent.** The 2016-2040 RTP/SCS does not identify any specific locally notable transit capital projects or capital investment packages for Ventura County. However, the project site is approximately one mile south of the Somis Road/Rice Street stop for Ventura County Transportation Commission Route 77, which provides express bus service between Simi Valley and Ventura and includes stops at key transit hubs including the Camarillo Metrolink station. Therefore, residents would have the opportunity to use public transit.
Active Transportation The 2016 RTP/SCS includes $12.9 billion for active transportation improvements, including $8.1 billion in capital projects and $4.8 billion as part of the operations and maintenance expenditures on regionally significant local streets and roads. The Active Transportation portion of the 2016 Plan updates the Active Transportation portion of the 2012 Plan, which has goals for improving safety, increasing active transportation usage and friendliness, and encouraging local active transportation plans. It proposes strategies to further develop the regional bikeway network, assumes that all local active transportation plans will be implemented, and dedicates resources to maintain and repair thousands of miles of dilapidated sidewalks. To accommodate the growth in walking, biking, and other forms of active transportation regionally, the 2016 Active Transportation Plan also considers new strategies and approaches beyond those proposed in 2012.	**Consistent.** The proposed project includes farmworker housing within 0.25 mile of local-serving retail and restaurants, the Camarillo Public Library, Rancho Campana High School, and agricultural fields. The project also includes an on-site network of meandering pedestrian walkways, approximately 379 bicycle parking spaces, and recreational amenities including community centers, play fields, tot lots/playgrounds, a basketball court, and a community garden area. The project would connect to existing sidewalks along the southbound lane of Somis Road, and the project site is within 375 feet of existing Class II bicycle lanes along Las Posas Road and North Lewis Road. Therefore, walking or bicycling would be viable modes of transportation to reach numerous destinations.
Zero-Emissions Vehicles While SCAG's policies are technology neutral with regard to supporting zero and/or near zero-emissions vehicles, this section will focus on zero-emissions vehicles. Since SCAG adopted the 2012 RTP/SCS, the Governor's Office released the Zero Emissions Vehicle (ZEV) Action Plan for 2013 and 2015. These plans identified state level funding to support the implementation of Plug-in Electric Vehicle (PEV) and Hydrogen Fuel Cell refueling networks. As part of the 2016 RTP/SCS, SCAG modeled PEV growth specific to Plug-in Hybrid Electric Vehicles (PHEV) in the SCAG region. These are electric vehicles that are powered by a gasoline engine when their battery is depleted. The 2016 RTP/SCS proposes a regional charging network that will increase the number of PHEV miles driven on electric	**Consistent.** In accordance with Section 4.106.4.2 of 2019 CALGreen, the project would be required to designate ten percent of parking spaces (i.e., 66 spaces) for electric vehicle charging spaces capable of supporting future electric vehicle supply equipment.

Reduction Strategy	Project Consistency
power. In many instances, these chargers may double the electric range of PHEVs. A fully funded regional charging network program would result in a reduction of one percent per capita GHG emissions.	

Source: SCAG 2016

- *2020-2045 RTP/SCS*. On May 7, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS (titled Connect SoCal) for federal transportation conformity purposes and will consider approval of the full plan and for all other purposes within 120 days of this date. Although the 2020-2045 RTP/SCS was not fully adopted at the time of this EIR (June 2020), this EIR provides an analysis of the project's consistency with the 2020-2045 RTP/SCS for full disclosure.

  The SCAG 2020-2045 RTP/SCS is forecast to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by 8 percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018. The 2020-2045 RTP/SCS builds upon the progress made through implementation of the 2016-2040 RTP/SCS and includes ten goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The SCS establishes a land use vision of center focused placemaking, concentrating growth in and near Priority Growth Areas, transferring of development rights, urban greening, creating greenbelts and community separators, and implementing regional advance mitigation (SCAG 2020). The project's consistency with the 2020-2045 RTP/SCS is discussed in Table 4.11-2. As shown therein, the proposed project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table 4.11-2 Project Consistency with Applicable SCAG 2020-2045 RTP/SCS Strategies

Reduction Strategy	Project Consistency
Focus Growth Near Destinations & Mobility Options. ▪ Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations ▪ Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets ▪ Plan for growth near transit investments and support implementation of first/last mile strategies z Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses ▪ Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods ▪ Encourage design and transportation options that reduce the reliance on and number of solo car trips	**Consistent**. The proposed project is strategically located to provide affordable housing to local farmworkers so that they are able to live in close proximity to agricultural fields, which reduces VMT and associated GHG emissions. In addition, the project site is within 0.25 mile of local-serving retail and restaurants, the Camarillo Public Library, Rancho Campana High School, and agricultural fields. The project also includes an on-site network of meandering pedestrian walkways, approximately 379 bicycle parking spaces, and recreational amenities including community centers, play fields, tot lots/playgrounds, a basketball court, and a community garden area. The project would connect to existing sidewalks along the southbound lane of Somis Road, and the project site is within 375 feet of existing Class II bicycle lanes along Las Posas Road and North Lewis Road. Furthermore, the project site is approximately one mile south of the Somis Road/Rice Street stop for Ventura County Transportation Commission Route 77, which provides express bus service between Simi Valley and

Reduction Strategy	Project Consistency
(this could include mixed uses or locating and orienting close to existing destinations) ▪ Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking)	Ventura and includes stops at key transit hubs including the Camarillo Metrolink station. Therefore, the project would focus growth near destinations and mobility options.
Promote Diverse Housing Choices. ▪ Preserve and rehabilitate affordable housing and prevent displacement ▪ Identify funding opportunities for new workforce and affordable housing development ▪ Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply ▪ Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of GHGs	**Consistent**. The proposed project would involve construction of a multi-family housing complex for farmworker with 100 percent affordable units that would allow farmworkers to live in close proximity to agricultural fields, which would reduce commute trip distances. Therefore, the project would promote diverse housing choices that support the reduction of GHG emissions.
Leverage Technology Innovations. ▪ Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space ▪ Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments ▪ Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Consistent.** In accordance with Section 4.106.4.2 of 2019 CALGreen, the project would be required to designate ten percent of parking spaces (i.e., 66 spaces) for electric vehicle charging spaces capable of supporting future electric vehicle supply equipment. Furthermore, the project would be required to install photovoltaic (PV) solar panels that generate an amount of electricity equal to expected electricity usage on all residential buildings in accordance with the 2019 Building Energy Efficiency Standards. Therefore, the project would leverage technology innovations.
Support Implementation of Sustainability Policies. ▪ Pursue funding opportunities to support local sustainable development implementation projects that reduce GHG emissions ▪ Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations ▪ Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space ▪ Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies ▪ Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region ▪ Continue to support long range planning efforts by local jurisdictions	**Consistent.** The project would be consistent with the current County General Plan and the Draft 2040 General Plan, which includes the County's Draft Climate Action Plan (see Table 4.11-3 and Table 4.11-4, respectively). In addition, the project would be constructed in accordance with the 2019 CALGreen. Therefore, the project would support implementation of sustainability policies.

Reduction Strategy	Project Consistency
▪ Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	
Promote a Green Region. ▪ Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards ▪ Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration ▪ Integrate local food production into the regional landscape ▪ Promote more resource efficient development focused on conservation, recycling and reclamation ▪ Preserve, enhance and restore regional wildlife connectivity ▪ Reduce consumption of resource areas, including agricultural land ▪ Identify ways to improve access to public park space	**Consistent.** The project would be consistent with the current County General Plan and the Draft 2040 General Plan, which includes the County's draft Climate Action Plan (see Table 4.11-3 and Table 4.11-4, respectively). In addition, the project would be constructed in accordance with the 2019 CALGreen. As discussed in Section 4.2, *Agricultural Resources – Soils*, of this EIR, the project would result in significant and unavoidable impacts to Important Farmland. However, the project's design includes clustering of the housing complex features to the extent feasible and, therefore, the project's impacts to agricultural land would be reduced to the maximum extent possible. Therefore, the project would promote a "green" region.

Source: SCAG 2020

- *Current (2019) Ventura County General Plan*. The current (2019) adopted County of Ventura General Plan contains goals and policies related to GHG emissions reduction in several elements, including the Resources Element and the Public Facilities and Services Element. Table 4.11-3 summarizes the project's consistency with the policies of the current (2019) Ventura County General Plan related to GHG emission reduction. As shown therein, the project would be consistent with the applicable policies of the current Ventura County General Plan.

Table 4.11-3 Project Consistency with Current (2019) County General Plan

Policy	Project Consistency
1.3.2.5. Landscape plans for discretionary development shall incorporate water conservation measures as prescribed by the County's Guide to Landscape Plans, including use of low water usage landscape plants and irrigation systems and/or low water usage plumbing fixtures and other measures designed to reduce water usage.	**Consistent**. The project includes use of a landscaping plant palette with drought-tolerant tree and shrub species and would be required to comply with the County's Landscape Design Criteria (which supersedes the County's Guide to Landscape Plans) for all landscaped parking areas pursuant to Ventura County Code Section 8108-5.14.3 (County of Ventura 1992). The project would utilize water-efficient irrigation systems such as bubblers or drip irrigation. In addition, 2019 CALGreen requires compliance with the current California Department of Water Resources Model Water Efficient Landscape Ordinance, which includes use of automatic irrigation systems utilizing weather and/or soil moisture based irrigation controllers (Title 23 California Code of Regulations Section 492.7).

Policy	Project Consistency
1.9.2.1. Discretionary development shall be evaluated for impact to energy resources and utilization of energy conservation techniques.	**Consistent**. The project would be constructed in accordance with 2019 Building Energy Efficiency Standards and 2019 CALGreen, which require implementation of a variety of energy conservation and energy efficiency features. In addition, as discussed in Section 4.10.47, *Energy*, the project would not result in wasteful, inefficient, or unnecessary consumption of energy and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.
1.9.2.4. The Building and Safety Division shall continue to implement Title 24 energy efficiency standards for buildings.	**Consistent**. The project would be constructed in accordance with 2019 Title 24 standards.
4.2.2.8. Discretionary development shall be conditioned, where feasible, to minimize traffic impacts by incorporating pedestrian and bicycle pathways, bicycle racks and lockers, ridesharing programs, transit improvements (bus turnouts, shelters, benches), and/or transit subsidies for employees or residents of the proposed development.	**Consistent.** The project would include an on-site network of meandering pedestrian walkways and approximately 379 bicycle parking spaces. The project would connect to existing sidewalks along the southbound lane of Somis Road, and the project site is within 375 feet of existing Class II bicycle lanes along Las Posas Road and North Lewis Road. Therefore, the project would minimize traffic impacts by incorporating new and existing pedestrian and bicycle infrastructure.

Source: County of Ventura 2019

- *Draft Ventura County 2040 General Plan*. The Draft Ventura County 2040 General Plan incorporates policies and programs related to GHG emission reductions such that the General Plan will serve as the County's Climate Action Plan. Policies and programs are integrated in the Land Use Element; Circulation Element; Public Facilities, Services, and Infrastructure Element; Conservation and Open Space Element; Hazards and Safety Element; Agriculture Element; and Water Resources Element. Table 4.11-4 summarizes the project's consistency with policies of the Draft Ventura County 2040 General Plan associated with GHG emission reductions. As shown therein, the project would be consistent with the applicable policies of the Draft 2040 General Plan.

Table 4.11-4 Project Consistency with Draft Ventura County 2040 General Plan

Policy	Project Consistency
LU-1.1 Guidelines for Orderly Development. The County shall continue to promote orderly and compact development by: ▪ Working with cities in Ventura County and the Ventura Local Agency Formation Commission (LAFCO) to promote and maintain reasonable city boundaries and Spheres of Influence to prevent growth-inducing urban development in unincorporated areas, and ▪ Require unincorporated urban development to be located in areas designated as Existing Communities and unincorporated urban centers consistent with the Guidelines for Orderly Development and as defined in Policy LU-1.2.	**Consistent**. Although the project site is not located in an area designated as an Existing Community, the project site is adjacent to the boundary of the city of Camarillo and therefore would not represent growth-inducing development because it would be well-served by minor extensions to existing utility infrastructure and public services. In addition, the project would have a density of approximately 19.5 dwelling units per acre, which is consistent with the County's Residential High Density (RHD) zoning classification that allows 20 dwelling units per acre. In addition, the project site is within 0.25 mile of local-serving retail and restaurants, the Camarillo Public Library, and Rancho Campana High School. Therefore, the project would consist of orderly and compact development.

Policy	Project Consistency
LU-16.9 Building Orientation and Landscaping. The County shall encourage discretionary development to be oriented and landscaped to enhance natural lighting, solar access, and passive heating or cooling opportunities to maximize energy efficiency.	**Consistent.** As shown in Figure 2-6 in Section 2, *Project Description*, the project includes planting of approximately 242 trees throughout the project site, which would provide passive cooling opportunities to maximize building energy efficiency. In addition, in accordance with Section 150.1(b)14 of the 2019 Building Energy Efficiency Standards, the project would be required to install PV solar panels that generate an amount of electricity equal to expected electricity usage.
CTM-2.3 County Road Access. The County shall require discretionary development with access onto a County road to have the access point(s) designed and built to County standards.	**Consistent**. The project's access points onto Somis Road would be required to be designed and built to County standards.
CTM-2.11 Efficient Land Use Patterns. The County shall establish land use patterns that promote shorter travel distances between residences, employment centers, and retail and service-oriented uses to support the use of public transportation, walking, bicycling, and other forms of transportation that reduce reliance on single-passenger automobile trips.	**Consistent**. The proposed project is strategically located to provide affordable housing to local farmworkers so that they are able to live in close proximity to agricultural fields. In addition, the project site is within 0.25 mile of local-serving retail and restaurants, the Camarillo Public Library, Rancho Campana High School, and agricultural fields. The project also includes an on-site network of meandering pedestrian walkways, approximately 379 bicycle parking spaces, and recreational amenities including community centers, play fields, tot lots/playgrounds, a basketball court, and a community garden area. The project would connect to existing sidewalks along the southbound lane of Somis Road, and the project site is within 375 feet of existing Class II bicycle lanes along Las Posas Road and North Lewis Road. Therefore, the project would promote shorter travel distances between various destinations.
CTM-2.27 Discretionary Development and Conditions of Approval to Minimize Traffic Impacts. The County shall require that discretionary development be subject to permit conditions of approval, where feasible, to minimize traffic impacts by incorporating pedestrian and bicycle pathways, bicycle racks and lockers, ridesharing programs, transit improvements (bus turnouts, shelters, benches), and/or transit subsidies for employees or residents of the proposed development.	**Consistent.** The project includes an on-site network of meandering pedestrian walkways, approximately 379 bicycle parking spaces, and recreational amenities including community centers, play fields, tot lots/playgrounds, a basketball court, and a community garden area. The project would connect to existing sidewalks along the southbound lane of Somis Road, and the project site is within 375 feet of existing Class II bicycle lanes along Las Posas Road and North Lewis Road. Therefore, the project would minimize traffic impacts by incorporating pedestrian and bicycle infrastructure.
CTM-3.3 Regional Destination Focus for Bicycle Network. The County shall encourage the development of a bicycle network that connects to regional destinations such as parks, trails, educational institutions, employment centers, transit, park and ride lots, and tourist destinations.	**Consistent**. The project site is within 375 feet of existing Class II bicycle lanes along Las Posas Road and North Lewis Road, which provide connections to the larger bicycle lane network throughout Camarillo.
CTM-3.10 Bicycle Storage Facilities. The County shall require adequate bicycle storage facilities (e.g., bicycle racks, lockers) for discretionary development as determined by allowable land uses at a given site.	**Consistent.** The project would include approximately 379 bicycle parking spaces.

Policy	Project Consistency
CTM-4.2 Alternative Transportation. The County shall encourage bicycling, walking, public transportation, and other forms of alternative transportation to reduce VMT, traffic congestion, and GHG emissions.	**Consistent.** The proposed project includes farmworker housing within 0.25 mile of local-serving retail and restaurants, the Camarillo Public Library, Rancho Campana High School, and agricultural fields. The project also includes an on-site network of meandering pedestrian walkways, approximately 379 bicycle parking spaces, and recreational amenities including community centers, play fields, tot lots/playgrounds, a basketball court, and a community garden area. The project would connect to existing sidewalks along the southbound lane of Somis Road, and the project site is within 375 feet of existing Class II bicycle lanes along Las Posas Road and North Lewis Road. Therefore, alternative transportation would available to reach numerous destinations.
CTM-6.4 Facilities for Emerging Technologies. The County shall support the development of alternative fueling stations (e.g., electric and hydrogen) and vehicle-to-infrastructure (V2I) technology for emerging technologies.	**Consistent.** In accordance with Section 4.106.4.2 of 2019 CALGreen, the project would be required to designate ten percent of parking spaces (i.e., 66 spaces) for electric vehicle charging spaces capable of supporting future electric vehicle supply equipment.
CTM-6.5 Electric Vehicle Charging Stations. The County shall support the installation of electric vehicle charging stations, where feasible, at County facilities, parking lots, park-and-ride lots, truck stops, and new development.	**Consistent.** In accordance with Section 4.106.4.2 of 2019 CALGreen, the project would be required to designate ten percent of parking spaces (i.e., 66 spaces) for electric vehicle charging spaces capable of supporting future electric vehicle supply equipment.
PFS-5.4 Solid Waste Reduction. The County shall support and promote solid waste reduction, recycling, and composting efforts, including food waste reduction in cases where consumable food can be redistributed rather than disposed.	**Consistent**. The project would provide recycling facilities for residents.
COS-3.2 Tree Canopy. The County shall encourage the planting of trees and the protection of existing urban forests and native woodlands, savannahs, and tree canopy throughout the county, including along State or County designated scenic roadways and in residential and commercial zones throughout the county, especially those located within designated disadvantaged communities.	**Consistent.** As shown in Figure 2-6 in Section 2, *Project Description*, the project includes planting of approximately 242 trees throughout the project site. As discussed in Section 4.3, *Biological Resources*, due to the disturbed nature of the project site, the project would not adversely impact urban forests, native woodlands, savannahs, or tree canopy.
COS-8.6 Zero Net Energy and Zero Net Carbon Buildings. The County shall support the transition to zero net energy and zero net carbon buildings, including electrification of new buildings.	**Consistent**. The project would be constructed in accordance with the 2019 Building Energy Efficiency Standards, which implement the State's vision for zero net energy new residential construction.
COS-8.7 Sustainable Building Practices. The County shall promote sustainable building practices that incorporate a "whole systems" approach for design and construction that consumes less energy, water, and other nonrenewable resources, such as by facilitating passive ventilation and effective use of daylight.	**Consistent.** The project would be constructed in accordance with 2019 CALGreen, which includes requirements for sustainable building practices.
COS-8.8 Renewable Energy Features in Discretionary Development. The County shall encourage the integration of features that support the generation, transmission, efficient use, and storage of renewable energy sources in discretionary development.	**Consistent**. In accordance with Section 150.1(b)14 of the 2019 Building Energy Efficiency Standards, the project would be required to install PV solar panels that generate an amount of electricity equal to expected electricity usage.

Policy	Project Consistency
COS-8.9 Urban Tree Canopy Improvements for Energy Conservation. The County shall encourage discretionary development to include the planting of shade trees on each property and within parking areas to reduce radiation heat production.	**Consistent.** As shown in Figure 2-6 in Section 2, *Project Description*, the project includes planting of approximately 242 trees throughout the project site to provide shading, which would reduce radiation heat production.
COS-9.1 Open Space Preservation. The County shall preserve natural open space resources through: ▪ The concentration of development in Urban Areas and Existing Communities; ▪ Use of cluster or compact development techniques in discretionary development adjacent to natural open space resources; ▪ Maintaining large lot sizes in agricultural areas, rural and open space areas; ▪ Discouraging conversion of lands currently used for agricultural production or grazing; limiting development in areas constrained by natural hazards; and ▪ Encouraging agricultural and ranching interests to maintain natural habitat in open space areas where the terrain or soil is not conducive to agricultural production or grazing.	**Consistent.** As discussed in Section 4.2, *Agricultural Resources – Soils*, of this EIR, the project would result in significant and unavoidable impacts to Important Farmland. However, the project's design includes clustering of the housing complex features to the extent feasible and, therefore, the project's impacts to agricultural land would be reduced to the maximum extent possible.
COS-9.3 Open Space Preservation. The County shall place a high priority on preserving open space lands for recreation, habitat protection, wildlife movement, flood hazard management, public safety, water resource protection, and overall community benefit.	**Consistent**. The project includes development on existing agricultural lands. Therefore, the project would not result in the conversion of open space land to non-open space use.
HAZ-10.5 Air Pollution Impact Mitigation Measures for Discretionary Development. The County shall work with applicants for discretionary development projects to incorporate bike facilities, solar water heating, solar space heating, incorporation of electric appliances and equipment, and the use of zero and/or near zero emission vehicles and other measures to reduce air pollution impacts and reduce GHG emissions.	**Consistent**. The project would include approximately 379 bicycle parking spaces, and in accordance with Section 4.106.4.2 of 2019 CALGreen, the project would be required to designate ten percent of parking spaces (i.e., 66 spaces) for electric vehicle charging spaces capable of supporting future electric vehicle supply equipment.
HAZ-11.9 Urban Greening. The County shall promote the use of urban greening techniques, such as cool pavement technology, parking lot shading, landscaping, and other methods to offset climate change impacts and reduce GHG emissions for discretionary development and County-initiated projects.	**Consistent.** As shown in Figure 2-6 in Section 2, *Project Description*, the project includes planting of approximately 242 trees throughout the project site to provide parking lot shading and landscaping, which would support urban greening.
WQ-3.1 Non-Potable Water Use. The County shall encourage the use of non-potable water, such as tertiary treated wastewater and household graywater, for industrial, agricultural, environmental, and landscaping needs consistent with appropriate regulations.	**Consistent.** The project would help the County be consistent with this policy because the proposed CWWTF would produce recycled, non-potable water to irrigation purposes at adjacent agricultural fields. Additionally, the project includes use of a landscaping plant palette with drought-tolerant plants and would utilize water-efficient irrigation systems to help reduce the need of potable water at the proposed housing complex.

Policy	Project Consistency
WQ-3.2 Water Use Efficiency for Discretionary Development. The County shall require the use of water conservation techniques for discretionary development, as appropriate. Such techniques include low-flow plumbing fixtures in new construction that meet or exceed the state Plumbing Code, use of graywater or reclaimed water for landscaping, retention of stormwater runoff for direct use and/or groundwater recharge, and landscape water efficiency standards that meet or exceed the standards in the California Model Water Efficiency Landscape Ordinance.	**Consistent.** The project would be constructed in accordance with 2019 CALGreen, which requires incorporation of water conservation and water efficiency features to achieve a 20 percent reduction in baseline indoor water use and compliance with the current California Department of Water Resources Model Water Efficient Landscape Ordinance (Title 23 California Code of Regulations Section 492.7). The project includes use of a landscaping plant palette with drought-tolerant tree and shrub species and would utilize water-efficient irrigation systems such as bubblers or drip irrigation. In addition, the project would be required to comply with the County's Landscape Design Criteria, which supersedes the County's Guide to Landscape Plans, for all landscaped parking areas pursuant to Ventura County Code Section 8108-5.14.3 (County of Ventura 1992).

Source: County 2020a

Emissions Quantification. As described above, compliance with plans, policies, and regulations adopted for the purpose of reducing GHG emissions indicates that project-related GHG emissions would be less than significant. Quantitative calculations of GHG emissions associated with the proposed project are provided in this subsection for informational purposes only in accordance with the recommendation of CEQA Guidelines Section 15064.4.

As shown in Table 4.11-5, construction activities associated with the project would generate an estimated 2,098 MT of CO_2e. When amortized over a 30-year period (the estimated project lifetime), construction of the project would generate approximately 70 MT of CO_2e per year.

Table 4.11-5 Estimated Construction Emissions

Construction Year	Annual Emissions MT of CO_2e
2021	418.7
2022	638.8
2023	629.5
2024	410.6
Total	2,097.6
Amortized over 30 years	**69.9**

Note: See Appendix C for modeling results. Some numbers may not add up precisely due to rounding considerations.

Table 4.11-6 combines the combined construction and operational GHG emissions associated with the proposed project. As shown therein, annual emissions from the proposed project would be 3,342 MT of CO_2e per year.

Table 4.11-6 Combined Annual GHG Emissions

Emission Source	Annual Emissions (MT of CO_2e)
Construction[1]	69.9
Operational	
Area	4.5
Energy[2, 3]	607.0
Solid Waste	83.3
Stationary[4]	2.0
Water[2, 5]	124.2
Mobile	
CO_2 and CH_4	2,417.4
N_2O	34.9
Total	**3,343.2**

[1] Amortized over a 30-year period.

[2] Emissions account for the continuing effects of the State Renewable Portfolio Standards program, which mandates 40 percent renewable energy procurement from eligible sources by 2024 (Senate Bill 100).

[3] Emissions account for compliance with Section 150.1(b)14 of the 2019 Building Energy Efficiency Standards, which mandates the installation of solar photovoltaic systems on all new multi-family residential uses three stories or shorter that generate an amount of electricity equal to expected electricity usage.

[4] Emissions generated by monthly testing of the proposed emergency generator.

[5] Emissions account for compliance with 2019 CALGreen, which mandates a 20 percent reduction in indoor water use as compared to calculated baseline levels for new residential uses and compliance with the current California Department of Water Resources Model Water Efficient Landscape Ordinance, which requires the use of water-efficient irrigation systems.

See Appendix C for emissions modeling results.

Summary. As described above, compliance with plans, policies, and regulations adopted for the purpose of reducing GHG emissions indicates that project-related GHG emissions would be less than significant. Quantitative calculations of GHG emissions associated with the proposed project are provided in this subsection for informational purposes only in accordance with the recommendation of CEQA Guidelines Section 15064.4.

- **Hazards and Hazardous Materials.** Section 4.8, *Waste Treatment – Solid Waste Facilities*, of the EIR discusses potential public/human health effects associated with the proposed CWWTF. Construction of the project would involve the temporary use and transport of hazardous materials used in the operation of required construction equipment. Hazardous materials used during operation of the housing complex would be limited to typical household and landscaping materials. The project would comply with applicable federal, state, and City regulations that regulate the handling, transport, and disposal of hazardous materials. Impacts would be less than significant.
- **Hydrology/Water Quality.** According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06111C0932F, the project site is not located within a Special Flood Hazard Area (a 100-year floodplain) (FEMA 2015) and the proposed housing complex would be located outside the 500-year floodplain.

  As discussed in Section 4.9, *Water Resources – Surface Water Quality*, of this EIR, compliance with the NPDES *General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities* (*Construction General Permit*) (Order 2009-0009, as amended by Orders 2010-0014-DWQ and 2012-006-DWQ) Best Management Practices (BMPs) for stormwater control and/or a project-specific stormwater pollution prevention plan (SWPPP)

would control and minimize erosion and siltation during project construction. Additionally, operation of the project would not directly or indirectly cause stormwater quality to exceed water quality objectives or standards in the applicable Ventura County Municipal Separate Storm Sewer System (MS4) Permit. Impacts due to potential erosion/siltation hazard and flooding hazard would be less than significant.

- **Mineral Resources.** The project site is located in an area predominately used for agricultural cultivation and residences. The area zoned as Mineral Resource Protection (MRP) overlay zone closest to the project site is approximately 6.5 miles to the west (County 2020). The project would not preclude the extraction of mineral resources. Therefore, no impact would occur.
- **Population/Housing.** The project site contains residential and ancillary agriculture buildings. However, project would not demolish or alter the existing on-site residences. Therefore, the project would not involve the displacement of existing residences or people and no impact would occur.
- **Public Services.** The Ventura County Sheriff Department and Ventura County Fire Department would provide police, fire, and emergency medical services to the project site. Additionally, the project site would be served by Somis Union School District and Oxnard Union High School District. Additional demand to public services would be offset by the payment of property taxes, as well as school fees pursuant to Section 65996 of the California Government Code. The project would not include or require the need for new or expanded public service facilities or schools and, therefore, no associated environmental impacts would occur. Impacts to public services would be less than significant.
- **Recreation.** The proposed housing complex would increase demand for parklands and recreation centers. However, the project would not directly affect any existing parks and would include on-site recreational facilities such as community center rooms, playgrounds/tot lots, play fields, a community garden, outdoor courtyards, and a basketball court. These on-site amenities would offset project demand on recreational facilities in the region. In addition, the project applicant would be required to pay fees in accordance with the Quimby Act (Government Code Section 66477). Therefore, impacts to recreational facilities would be less than significant.
- **Tribal Cultural Resources.** Under California Assembly Bill (AB) 52, lead agencies are required to consult with "California Native American tribe[s] that [are] traditionally and culturally affiliated with the geographic area of the proposed project." On June 30, 2020, the County sent an AB 52 consultation letter to Julie Tumamait-Stenslie of the Barbareño-Ventureño Band of Mission Indians (Appendix L). The consultation letter included project plans and an aerial map of the project site, and requested information regarding concerns or recommendations related to the proposed project. On July 1, 2020, Ms. Tumamait-Stenslie contacted the County to request formal consultation. At the time of publication of this Draft EIR for public review, formal AB 52 consultation is currently underway. Per AB 52, this consultation process must be completed before the Final EIR can be certified. The EIR will be updated, as appropriate, after AB 52 consultation is completed.
- **Utilities/Service Systems.** The proposed housing complex would be served potable water by Ventura County Water Works District No. 19 (Water District). The project site is currently located within the Water District's service area and existing water supply pipelines and facilities are present in the project site vicinity. The Water District provided a letter stating that it has the ability to provide water to the housing complex (Water District 2019). Wastewater (sewage) generated by the housing complex would be treated by the proposed CWWTF. The housing

complex, including the CWWTF, would require electrical service, which would be provided by Southern California Edison. Cable and telephone service would be provided to the housing complex by Spectrum. No natural gas service would be provided to or required by the housing complex. The proposed development would generate municipal solid waste from the proposed 360 residential units. Solid waste would be transported to either Toland Road Landfill or Simi Valley Landfill and Recycling Center, which have approximately 10.6 million and 88 million cubic yards of remaining capacity, respectively (California Department of Resource Recycling and Recovery 2002, 2012). Impacts related to solid waste management would be less than significant. Impacts to utilities/service systems would be less than significant.

- **Wildfire.** According to the Fire Hazard Severity Zone maps created by the California Department of Forestry and Fire Protection (CAL Fire), the project site is adjacent to a Moderate Fire Hazard Severity Zone, but is not located within a Very High Fire Hazard Severity Zone (CAL Fire 2007). The project site is also not located in or near a Hazardous Watershed Fire Area. The proposed project would comply with the Ventura County Building Code and Ventura County Fire Code standards related to emergency access and fire protection. The proposed project would also be subject to conditions of approval to ensure the project is in conformance with current California State Law and the Ventura County Fire Code. Therefore, impacts would be less than significant.

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5 Other CEQA Required Discussions

This section discusses growth-inducing impacts and irreversible environmental impacts that would be caused by the proposed project.

5.1 Growth Inducement

Section 15126(d) of the CEQA Guidelines requires a discussion of a project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.1.1 Population Growth

The proposed 360-unit housing complex would result in an estimated population of 1,215 (Jensen 2019). As determined by the Southern California Association of Governments (SCAG), the January 2020 population of unincorporated Ventura County is 102,000 and the population growth forecast is 113,600 in 2040 (SCAG 2016), for an increase of 11,600 persons over the next 20 years. The estimated 1,215 residents from the proposed project represents 11 percent of the estimated population increase in the area through 2040.

The project is intended to provide housing for current farmworkers rather than induce people to move to Ventura County. The project would provide affordable housing for local farmworkers and their families, who likely currently live and work in Ventura County. Therefore, the project's population could be accommodated within the unincorporated Ventura County growth projections. Impacts associated with population increase from the proposed project would be less than significant.

Moreover, as discussed in Section 4.1, *Air Quality*, and under "Greenhouse Gas Emissions" in Section 4.10, *Impacts Found Not to be Significant*, development and occupancy of the proposed project would not generate air quality or GHG emissions that would result in a significant impact. Additionally, the proposed housing complex would be adjacent to existing development and agricultural fields. Due to the active agricultural and urbanized setting of the project site, the project area lacks significant scenic resources, native biological resources, known archaeological resource remains, surface water, or other environmental resources. Therefore, any population growth associated with the project would not result in significant long-term physical environmental effects.

5.1.2 Economic Growth

The proposed project would generate temporary employment opportunities during construction. Because construction workers would be expected to be drawn from the existing regional work force, construction of the project would not be growth-inducing from a temporary employment standpoint. The purpose of the project is to provide housing for current farmworkers in the County and, therefore, the project would not cause an exceedance in the regional employment growth forecasts.

The proposed project would not be expected to induce substantial economic expansion to the extent that direct physical environmental effects would result. Moreover, the environmental effects associated with any future development in or around the project site would be addressed as part of the CEQA environmental review for such development projects.

5.1.3 Removal of Obstacles to Growth

The project site is located in an area that is served by existing infrastructure. The Ventura County Water Works District No. 19 (Water District) would provide potable water to the proposed housing complex. The project site is currently located within the Water District's service area. The housing complex, including the CWWTF, would require electrical service, which would be provided by Southern California Edison. Cable and telephone service would be provided to the housing complex by Spectrum. No natural gas service would be provided to or required by the housing complex. Applicable utility agencies/companies have indicated the ability to serve the proposed project, with the exception of wastewater (sewage) disposal. Minor improvements to water, electrical, cable, and telephone infrastructure could be needed, but would be sized to specifically serve the proposed project.

The housing complex would be accessible from Somis Road via easements located on and adjacent to the project site. The driveways would be adequate to serve the project and would accommodate expected traffic volumes and project site access needs, as discussed in Section 4.7, *Transportation*, of this EIR.

As discussed in Section 2.5.2, *Community Wastewater Treatment Facility*, wastewater generated by the housing complex would be treated by the proposed on-site CWWTF, which would be designed to treat wastewater generated by the housing complex to tertiary treatment standards. The on-site CWWTF would treat all wastewater generated by the housing complex, which would be constructed in three phases. The CWWTF would be constructed as part of Phase 1 and would be expanded as necessary to accommodate the needs of the housing complex as additional apartments are constructed during Phases 2 and 3. At full occupancy of the housing complex (360 units), the CWWTF would treat an estimated average daily flow of 99,000 gallons of wastewater per day (Water Resource Engineering Associates [WREA] 2019) to accommodate the needs of the proposed housing complex. Although the proposed CWWTF would be built to the capacity to only serve the project, in the future, like any infrastructure facility, the CWWTF could be expanded to accommodate additional future growth in the vicinity of the project site. Any future expansion would require approvals from the County, the Los Angeles Regional Water Quality Control Board (RWQCB), and the California State Water Resources Control Board (SWRCB), as discussed in Section 2.7, *Required Approvals*, of this EIR. Such approvals would be discretionary and subject to CEQA review. Any future expansion of the CWWTF would presumably be sized to meet any future expansion of the on-site housing complex (beyond 360 units), which would also be discretionary and subject to CEQA. Based on these facts, any growth inducing impacts due to the removal of obstacles to growth would not be significant.

5.2 Irreversible Environmental Effects

The CEQA Guidelines require that EIRs contain a discussion of significant irreversible environmental changes. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed project.

The proposed project would include development on a portion of a mostly undeveloped project site in unincorporated Ventura County. Construction and operation of the project would involve an irreversible commitment of construction materials and non-renewable energy resources. For example, the project would involve the use of building materials and energy, some of which are non-renewable resources, to construct the 360-unit housing complex. Consumption of these resources would occur with any development in the region and are not unique to the proposed project.

The proposed project would also irreversibly increase local demand for non-renewable energy resources such as petroleum products. However, increasingly efficient building design would offset this demand to some degree by reducing energy demands of the project. As discussed in Section 2, *Project Description*, the project would include designed to encourage walking within the housing complex via a meandering trails system, as well as bicycle use with 379 bicycle parking spaces throughout the housing complex. As discussed in 4.10, *Impacts Found Not to be Significant*, under "Energy," the project would comply with applicable energy conservation requirements. The project would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6, of the California Code of Regulations [CCR], *California's Energy Efficiency Standards for Residential and Nonresidential Buildings*) and the California Green Building Standards Code (CCR Title 24, Part 11). The California Energy Code provides energy conservation standards for all new residential buildings constructed in California, and the Green Building Standards Code requires solar access (for efficient use of solar panels in the future), natural ventilation, and stormwater capture.

The project would also increase demand for water supply and the need for wastewater disposal and treatment. The project would minimize water demand by including drought-tolerant plants in the landscape palette and a weather-sensing "smart controller" to monitor irrigation water and manage daily water consumption. Treated wastewater from the proposed CWWTF would be used for irrigating adjacent agricultural fields, which would help reduce the usage of potable water and/or groundwater needed to water such fields.

Consequently, the project would not use unusual amounts of energy or construction materials and impacts related to consumption of non-renewable and slowly renewable resources would be less than significant. Again, consumption of these resources would occur with any development in the region and is not unique to the proposed project.

CEQA requires decision makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. Although the conversion of agricultural resources is not technically irreversible, it is irreversible for practical purposes. The analysis contained in this EIR concludes that the proposed project would result in a significant and unavoidable impact to agricultural soils, as discussed in Section 4.2, *Agricultural Resources – Soils*, impacts would remain significant and unavoidable due to this irreversible loss. However, the project's benefits include development of a financially viable affordable residential community for lower-income farmworkers and their families in Ventura County to accommodate broad market needs, which balances the irreversible effects to agricultural resources.

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6 Alternatives

As required by Section 15126.6 of the CEQA Guidelines, this EIR examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives (stated in Section 2 of this EIR and below) but would avoid or substantially lessen the significant adverse impacts.

CEQA Guidelines Section 15126.6 states, "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation."

As discussed in Section 2, *Project Description*, the objectives for the proposed project, are as follows:

1. Develop a financially viable affordable residential community for lower-income farmworkers and their families in Ventura County to accommodate broad market needs.
2. Provide affordable housing units for farmworkers that will help meet the identified need assigned to Ventura County pursuant to California State Law and adopted in the County's Housing Element.
3. Support the local agricultural industry by providing local farmworker housing proximate to agricultural operations in Ventura County.
4. Provide a variety of apartment sizes to meet various family sizes.
5. Arrange the proposed apartment buildings and on-site amenities in a manner that is logical and promotes efficient use of the housing complex property.
6. Provide recreational opportunities for future project residents with on-site play fields, tot lots/playgrounds, active recreation opportunities, a community garden area, meeting rooms, and a network of meandering pedestrian walkways.
7. Minimize proposed building footprints and other impervious surfaces to accommodate on-site landscaped common space for future project residents.
8. Design an efficient internal circulation system that is safe for pedestrians and bicyclists.
9. Locate affordable housing in a location that provides convenient access to nearby services such as library, schools, commercial centers, and religious institutions.
10. Develop the project site in a manner that would not adversely affect neighboring land uses or infrastructure, including with regard to:
    - □ Water and sanitation services;
    - □ Land use compatibility; and
    - □ The scale of the project.
11. Develop the project site in a manner that would minimize affects from neighboring land uses to the proposed housing complex and future project residents.
12. Avoid modification to the existing Bell Ranch residences and agricultural buildings.

Included in this analysis are two alternatives, including the CEQA-required "no project" alternative and a reduced footprint alternative that may reduce project-related environmental impacts as identified in this EIR. Table 6-1 provides a summary comparison of the development characteristics of the proposed project and each alternative. Detailed descriptions of the alternatives are included in the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 6.1 and 6.2. Additional alternatives that were considered, but rejected as infeasible are discussed in Section 6.3.

Table 6-1 Comparison of Project Alternatives to the Proposed Project

Feature	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Footprint
Dwelling units	360 units	0 units	360 units
Development footprint	18.73 acres	None	17.01 acres
Community Wastewater Treatment Facility (CWWTF)	Conventional membrane bioreactor package (1,488 square feet)	None	Conventional membrane bioreactor package (1,488 square feet)
Amenities	Community centers, play fields, tot lots/playgrounds, a basketball court, a community garden area, pedestrian walkways	None	One community center, one playground, pedestrian walkways

6.1 Alternative 1: No Project Alternative

6.1.1 Description

The No Project Alternative assumes that the proposed housing complex, community wastewater treatment facility (CWWTF), and other amenities associated with the proposed project would not be constructed. The portions of the site proposed to be converted to farmworker housing would continue to be used for agricultural production. Similar to the proposed project, the existing two residences and ancillary agricultural buildings would remain on the site. However, the No Project Alternative would not fulfill Project Objectives 1 through 12. This alternative would not provide affordable housing for farmworkers in Ventura County.

6.1.2 Impact Analysis

a. Air Quality

The No Project Alternative would not include development of any of the land uses included in the proposed project and no criteria air pollutant emissions would be generated. In addition, no toxic air contaminants (TACs) would be generated, as the No Project Alternative would not involve generation of diesel particulate matter (DPM) exhaust emissions from heavy-duty diesel equipment. The site would remain in agricultural production and long-term air pollutant emissions would remain similar to existing conditions.

As discussed in Section 4.1, *Air Quality*, construction activities associated with the proposed project would generate temporary air pollutant emissions associated with heavy-duty equipment and vehicle trips, but emissions would be less than significant. Nevertheless, because ROC and NO_X

emissions would exceed 25 pounds per day, implementation of Mitigation Measure AQ-1 (ROC and NO_X Reduction Measures) is recommended for the project. The proposed project would also generate operational criteria air pollutant emissions, although such emissions would be less than significant.

This alternative would have no impact to air quality. Thus, the impact would be lower than that of the proposed project and project mitigation would not apply.

b. Agricultural Resources – Soils

Under the No Project Alternative, construction of the housing complex would not occur and no agricultural lands would be converted to nonagricultural uses. As described in Section 4.2, *Agricultural Resources – Soils*, the proposed project would result in the direct conversion of 18.2 acres of Prime Farmland or Farmland of Statewide Importance to nonagricultural use, which exceeds the 5-acre significance threshold for impacts to Prime Farmland or Farmland of Statewide Importance (see Table 4.2-2). Thus, the proposed project would result in significant and unavoidable impacts to agricultural resources.

No impact to agricultural resources would occur under the No Project Alternative. Thus, the significant and unavoidable impact to agricultural resources associated with the proposed project would be avoided.

c. Biological Resources

Under the No Project Alternative, the current agricultural operations occurring on the project site would continue and no impact to special-status species, protected trees, nesting birds, or jurisdictional waters/wetlands would occur. As discussed in Section 4.3, *Biological Resources*, because the project site is previously disturbed and currently in active agricultural production, the proposed project would result in less than significant impacts to special-status species, protected trees, or nesting birds. In addition, it would have no impact to potentially jurisdictional waters or wetlands.

This alternative would have no impact to biological resources. Thus, the impact would be lower than that of the proposed project and project mitigation would not apply.

d. Cultural Resources – Historic

The project site was once part of a larger ranch established in the 19th century. As discussed in Section 4.4, *Cultural Resources – Historic*, the existing two residences and ancillary agricultural buildings at 2789 Somis Road are eligible for listing in the California Register of Historical Resources (CRHR) and as a Ventura County Landmark. This portion of the project site is therefore presumed to be a historical resource under CEQA.

The No Project Alternative would not change any aspects of the project site's surroundings and would have no impact to historical resources. The proposed project would not remove or change aspects of existing on-site buildings. It would change aspects of the surroundings on the project site; however, because the setting has already largely changed since the historical period due to ongoing subdivision and new construction, the proposed project would result in a less than significant impact to historical resources under CEQA.

The No Project Alternative would have less impact than the proposed project with respect to cultural resources, though the proposed project's impacts would be less than significant.

e. Noise and Vibration

Because the No Project Alternative would not involve construction activities, construction-related noise and vibration would not occur. Any noise and vibration generated by current agricultural activities would continue to occur, but the No Project Alternative would not increase noise generated on-site or in the site vicinity. As discussed in Section 4.5, *Noise and Vibration*, the proposed project would generate construction noise and vibration via heavy-duty equipment use and construction traffic, as well as operational noise related to stationary heating, ventilation, and air conditioning (HVAC) equipment, emergency generator and blower associated with the CWWTF, and increased traffic noise.

The No Project Alternative would have less impact than the proposed project with respect to noise and vibration, though the proposed project's impacts would be less than significant.

f. Public Health

In comparison, the No Project Alternative would not include the development of a CWWTF on the project site so it would have no impact related to public health. As discussed in Section 4.6, *Public Health*, the proposed project's CWWTF would be subject to specific building codes, water quality standards, and other regulations protecting public health. Impacts under the proposed project would be less than significant with regulatory compliance.

The No Project Alternative would have less impact than the proposed project with respect to public health, though the proposed project's impacts would be less than significant.

g. Transportation

Under the No Project Alternative, no increase in vehicle miles traveled (VMT) or traffic would occur. As discussed in Section 4.7, *Transportation*, implementation of the proposed project would result in approximately 7.3 million annual VMT, or approximately 20,000 daily VMT. The project could add 1,120 additional people to the area; therefore, this is approximately 17.8 daily VMT per capita. The project would therefore yield a daily VMT per capita of approximately 12 percent less than the Ventura County 2040 average of 20.2 miles per capita per day. The proposed project would result in less than significant impacts related to transportation, including VMT.

The No Project Alternative would have no impact related to safety or design of roads or VCFPD adopted Private Road Guidelines because it would not involve the construction of roads. In addition, it would have no impact on other transit facilities (pedestrian, bicycle, bus) because it would not introduce new development to the project site. As discussed in Section 4.7, the proposed project would have less than significant impacts related to safety and design of roads, Ventura County Fire Protection District (VCFPD) adopted Private Road Guidelines, and other transit facilities.

h. Waste Treatment and Disposal Facilities – Solid Waste

The No Project Alternative would not involve a CWWTF or other solid waste facilities and, therefore, would result in no impact related to solid waste facilities. As discussed in Section 4.8, *Waste Treatment and Disposal Facilities – Solid Waste Facilities*, the proposed project's CWWTF would temporarily store biosolids generated on the project site. The proposed project would result in less than significant impacts related to solid waste facilities because the project would comply with applicable state and local requirements. Its design would be subject to review by and approval from the Environmental Health Division of the Resource Management Agency of the County of Ventura.

The No Project Alternative would have less impact than the proposed project with respect to waste treatment and disposal facilities, though the proposed project's impacts would be less than significant.

i. Water Resources – Surface Water Quality

Under the No Project Alternative, there would be no change to land uses at the project site and no impact to surface water quality. As discussed in Section 4.9, *Water Resources – Surface Water Quality*, construction and operation of the proposed project would increase contaminants in stormwater runoff due to ground disturbance and changes in ground cover. With regulatory compliance, proposed project impacts to surface water quality would be less than significant.

Currently, the agricultural orchards adjacent to the project site are irrigated with relatively low-quality groundwater pumped from a private well. Under the No Project Alternative, this irrigation regime would continue. Under the proposed project, recycled water produced at the CWWTF would be beneficially reused to improve the quality of agricultural irrigation water at the adjacent orchards. The No Project Alternative would not include this beneficial surface water quality impact associated with the proposed project.

The No Project Alternative would have no impact with respect to surface water quality; however, because it would not include the proposed project's benefits, its impact would be adverse compared to the proposed project.

j. Land Use and Planning

The No Project Alternative would not change any land uses at the project site or create any conflicts with land use plans and policies. As discussed in Section 4.10, *Land Use and Planning*, the proposed project would also be consistent with the applicable General Plan goals and policies and would not require a General Plan amendment. The impact of the No Project Alternative with respect to land use and planning would be similar to that of the proposed project.

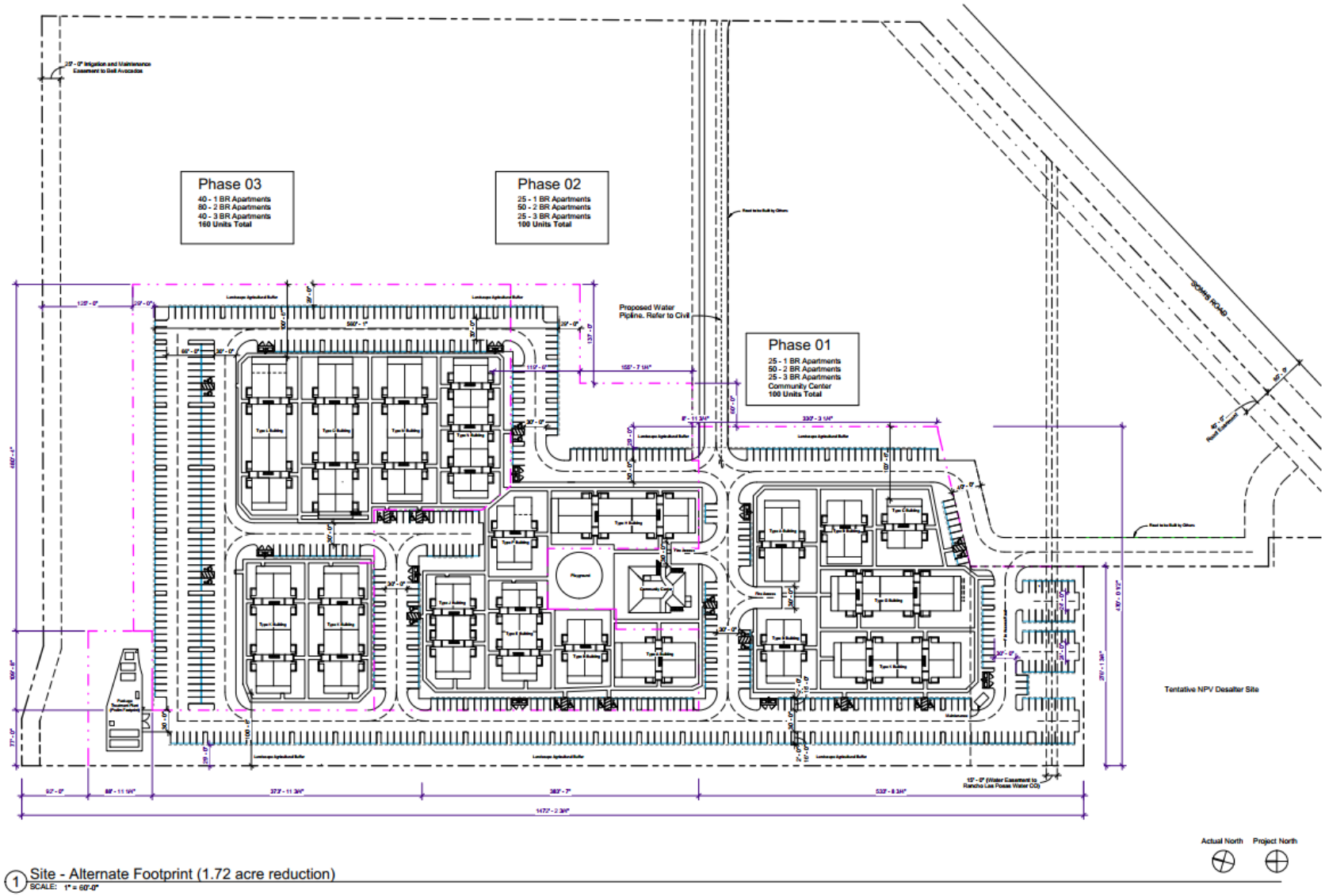
6.2 Alternative 2: Reduced Footprint

6.2.1 Description

The Reduced Footprint Alternative (Alternative 2) assumes that the proposed housing complex, community wastewater treatment facility (CWWTF), and some amenities associated with the proposed project would be constructed within a smaller development footprint on the project site at 2789 Somis Road. The development footprint would be reduced by 1.72 acres when compared to the proposed project. Similar to the proposed project, the two existing residences and ancillary agricultural buildings would remain on the site. Also similar to the proposed project, this alternative would include 360 dwelling units. However, only one of the two community centers included in the proposed project would be constructed under Alternative 2. Furthermore, Alternative 2 would not include the basketball court, play fields, or community garden included in the proposed project.

Figure 6-1 shows the site plan for Alternative 2.

Figure 6-1 Alternative 2 Site Plan



Like the proposed project, Alternative 2 would provide affordable housing for farmworkers in Ventura County. However, it would not fulfill Project Objective 6 because it would not provide all of the recreational opportunities for future project residents included under the proposed project.

6.2.2 Impact Analysis

a. Air Quality

Under Alternative 2, less construction activity would be required due to the reduced footprint (e.g., grading, material export, paving), thereby yielding reduced criteria air pollutant emissions. Like the proposed project, this alternative would result in short-term criteria air pollutant emissions associated with construction activities (e.g., heavy-duty equipment, construction personnel trips). Similar to the proposed project, ROC and NO_X emissions would likely exceed 25 pounds per day so implementation of Mitigation Measure AQ-1 (ROC and NO_X Reduction Measures) would also be recommended for Alternative 2.

Construction-related activities associated with Alternative 2 would also result in emissions of short-term TACs and potential odors from off-road, heavy-duty diesel equipment for site preparation grading, building construction, and other construction activities. Similar to the proposed project, these impacts would be less than significant.

Similar to the proposed project, Alternative 2 would generate long-term criteria air pollutant emissions associated with operation (e.g., resident vehicle trips, energy use). Like the proposed project's operational emissions, these emissions would not exceed VCAPCD thresholds and impacts would be less than significant.

b. Agricultural Resources – Soils

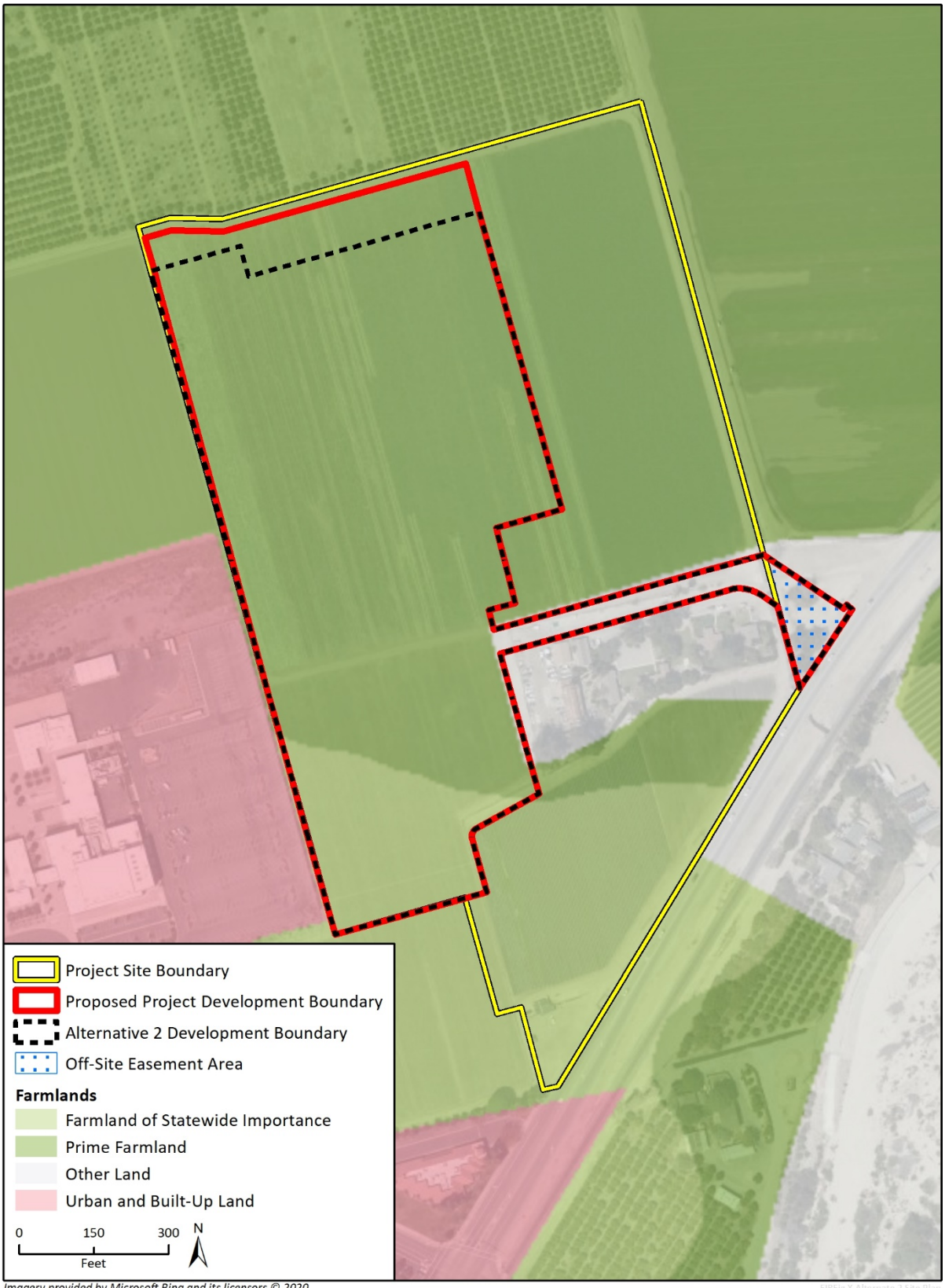
Alternative 2 would result in the direct conversion of 17.01 acres of Prime Farmland or Farmland of Statewide Importance to nonagricultural use. As described in Section 4.2, *Agricultural Resources – Soils*, the proposed project would result in the direct loss conversion of 18.2 acres of Prime Farmland or Farmland of Statewide Importance to nonagricultural use. Figure 6-2 shows the types of Important Farmland present on the project site, the development footprint of the proposed project, and the reduced development footprint of Alternative 2.

Alternative 2 would convert 1.72 fewer acres of Prime Farmland to nonagricultural use. The impact would therefore be reduced. Nevertheless, Prime Farmland conversion under Alternative 2 would continue to exceed the 5-acre significance threshold for impacts to Prime Farmland or Farmland of Statewide Importance (see Table 4.2-2). Consequently, similar to the proposed project, Alternative 2 would result in a significant and unavoidable impact to agricultural resources.

c. Biological Resources

Under Alternative 2, the construction footprint would be 1.72 acres smaller than the proposed project. The development footprints of the proposed project and Alternative 2 would both be located in previously disturbed agricultural land. Therefore, as with the proposed project, Alternative 2 would result in less than significant impacts to special-status species, protected trees, and nesting birds. Similar to the proposed project, Alternative 2 would result in significant impacts to potentially jurisdictional waters that would be mitigated to less than significant levels by implementation of Mitigation Measure BIO-3. Alternative 2's biological impacts would be similar to those of the proposed project.

Figure 6-2 Important Farmland – Proposed Project and Alternative 2



Imagery provided by Microsoft Bing and its licensors © 2020.
Farmland data provided by the Department or Conservation, 2016.

d. Cultural Resources – Historic

Under Alternative 2, the two existing residences and ancillary agricultural buildings, presumed to be historical resources under CEQA, would remain unchanged and in place. Similar to the proposed project, Alternative 2 would change aspects of the surroundings on the project site; however, because the setting has already largely changed since the historical period due to ongoing subdivision and new construction. Therefore, like the proposed project, Alternative 2 would result in a less than significant impact to historical resources.

e. Noise and Vibration

As with the proposed project, construction activities associated with Alternative 2 would generate noise and vibration via heavy-duty equipment use and construction traffic. Alternative 2 would require similar types of construction equipment and personnel as the proposed project and would therefore generate similar construction noise levels, though the overall duration of construction may be incrementally reduced.

Alternative 2 would generate operational noise related to stationary HVAC equipment, emergency generator and blower associated with the CWWTF, and increased traffic noise. These operational noise impacts would be similar to those of the proposed project. Noise associated with outdoor activities (e.g., basketball court, play fields, or community garden) would be incrementally reduced. Noise and vibration impacts associated with Alternative 2 would be less than significant.

f. Public Health

Under Alternative 2, the CWWTF would be the same size and configuration as under the proposed project. As discussed in Section 4.6, *Public Health*, the proposed project's CWWTF would be subject to specific building codes, water quality standards, and other regulations protecting public health. Similar to the proposed project, impacts under Alternative 2 would be less than significant with regulatory compliance.

g. Transportation

Similar to the proposed project, Alternative 2 would involve a farmworker housing complex with 360 dwelling units; therefore, it would generate the same traffic as the proposed project and transportation impacts would be the same. As with the proposed project, daily VMT per capita would be approximately 12 percent less than the Ventura County 2040 average of 20.2 miles per capita per day. In addition, like the proposed project, Alternative 2 would provide 100 percent affordable residential units and would be consistent with the County NCZO farmworker employment criteria so its is presumed to result in a less than significant impact related to VMT. Similar to the proposed project, Alternative 2 would not modify any public roads or intersections and shared access connections would be designed to meet the County Fire Department design standards. Similar to the proposed project, Alternative 2 would result in less than significant impacts related to safety and design of roads, VCFPD adopted Private Road Guidelines, and other transit facilities.

h. Waste Treatment and Disposal Facilities – Solid Waste

Under Alternative 2, the CWWTF would be the same size and configuration as under the proposed project. As discussed in Section 4.8, *Waste Treatment and Disposal Facilities – Solid Waste Facilities*, the CWWTF would temporarily store biosolids generated on the project site. Like the proposed

project, Alternative 2 would result in less than significant impacts related to solid waste facilities because, like the proposed project, facilities would comply with applicable state and local requirements and would be subject to review by and approval from the Environmental Health Division of the Resource Management Agency of the County of Ventura.

i. Water Resources – Surface Water Quality

Construction and operation of Alternative 2 would increase contaminants in stormwater runoff due to ground disturbance and changes in ground cover. Alternative 2 impacts would be similar to those of the proposed project. Because the development footprint of Alternative 2 would be 1.72 acres smaller than that of the proposed project, it would retain 1.72 acres of unpaved land as compared to the proposed project. Alternative 2 would, therefore, generate incrementally less stormwater runoff water. Similar to the proposed project, with regulatory compliance, runoff-related impacts to surface water quality would be less than significant under Alternative 2.

Currently, the agricultural orchards adjacent to the project site are irrigated with relatively low-quality groundwater pumped from a private well. Similar to the proposed project, under Alternative 2, recycled water produced at the CWWTF would be beneficially reused to improve the quality of agricultural irrigation water at the adjacent orchards.

Alternative 2 would have incrementally less impact than the proposed project with respect to surface water quality, though the proposed project's impacts would be less than significant.

j. Land Use and Planning

Similar to the proposed project, Alternative 2 would change the land use at the project site by removing agricultural land from production and introducing a farmworker housing complex. As discussed in Section 4.10, *Land Use and Planning*, the proposed project would be consistent with the applicable General Plan goals and policies and would not require a General Plan amendment. Similarly, Alternative 2 would have less than significant impacts related to land use and planning.

6.3 Alternatives Considered but Rejected

The proposed project would result in a significant and unavoidable impact related to agricultural resources due to the removal of Prime Farmland and Farmland of Statewide Importance. Air quality and biological resources impacts would be less than significant with mitigation. All other impacts would be less than significant without mitigation. This analysis therefore specifically identifies alternatives that would reduce the impact to agricultural resources.

In addition to the reduced footprint alternative analyzed above, alternatives identified by the County and members of the public were considered but found to be infeasible, as described herein.

Reduced Unit Alternative

A reduced unit alternative was considered as a potential reduced alternative to the proposed project. However, because the proposed housing complex would require fixed-cost water utility infrastructure upgrades and a package CWWTF, reducing the number of units would make the project economically infeasible for the non-profit project proponent. According to the project applicant, the cost to extend water service to the project site and develop a package wastewater treatment facility is in excess of $5 million. These costs are incurred at the beginning of the project,

resulting in substantial carrying costs for the builder. Financial feasibility studies indicate that a 360-unit complex is minimally viable.

In addition, a reduced unit alternative would be similar to the Reduced Footprint Alternative (Alternative 2) analyzed above with regard to reducing potential impacts to Agricultural Resources and Air Quality, but not Biological Resources because the eastern driveway would still be required for this alternative. Therefore, such an alternative was rejected from further consideration.

Alternate Site Location

Section 15126.6(f)(2) of the CEQA Guidelines addresses alternative locations for a project. The key question and first step in the analysis is whether any of the significant effects of the proposed project would be avoided or substantially lessened by putting the proposed project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Further, CEQA Guidelines Section 15126.6(f)(1) lists several factors that may be taken into account when addressing feasibility of alternatives (any alternative, not just alternative locations) and states, “No one of these factors establishes a fixed limit on the scope of reasonable alternatives.” The site has been selected in accordance with Project Objective 3, providing local farmworker housing proximate to agricultural operations in Ventura County, and Project Objective 9, convenient access to nearby services such as a library, schools, commercial centers, and religious institutions. There are no other known available parcels with the necessary attributes to meet project objectives. Development of the proposed project on an alternative agricultural site in Ventura County would likely result in similar environmental impacts that have been identified for the proposed project. As an alternative site with similar environmental characteristics in Ventura County with a willing seller was not found, no further environmental analysis for an alternative site was conducted.

Biologically Superior Alternative

During the comment period for the Notice of Preparation, the California Department of Fish and Wildlife (CDFW) submitted a comment suggesting that the EIR “include a complete discussion of the proposed project and a range of feasible alternatives to avoid or otherwise minimize impacts to sensitive biological resources and wildlife movement areas.” Potential impacts to biological resources have since been evaluated. As discussed in Section 4.3, no significant impacts to sensitive biological resources or wildlife movement areas were identified, with the exception of potentially jurisdictional waters. However, impacts to potentially jurisdictional waters cannot be avoided because the eastern driveway is a necessary as part of buildout of the farmworker housing complex project. A biologically superior alternative was rejected because the purpose of this chapter is to identify project alternatives that would reduce significant environmental impacts identified for the proposed project (CEQA Guidelines Section 15126.6[b]).

Calleguas Municipal Water District Alternative

During the comment period for the Notice of Preparation, an individual suggested an alternative that would tie into the Calleguas Municipal Water District (CMWD) for potable water supply. Early in the conceptual stage of the project, a direct connection to CMWD for domestic water supply was considered. However, CMWD is a water wholesaler and will not provide water directly to any development. For this alternative to be feasible, service from a new CMWD turnout would have to go through Ventura County Water Works District No. 19. As confirmed by Water Works District No.

19, a new CMWD turnout to serve a single development would not be allowed. Therefore, the CMWD alternative has been rejected from further analysis.

6.4 Environmentally Superior Alternative

Pursuant to the CEQA Guidelines (15126.6(d)), an EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project to identify the environmentally superior alternative. Table 6-2 indicates whether each alternative's environmental impact is greater than, less than, or similar to that of the proposed project for each of the issue areas studied.

Table 6-2 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: No Project	Alternative 2: Reduced Footprint
Air Quality	Less than Significant with Mitigation Incorporated	+	Less than Significant with Mitigation Incorporated (+)
Agricultural Resources – Soils	Significant and Unavoidable	+	Significant and Unavoidable (+)
Biological Resources	Less than Significant with Mitigation Incorporated	+	Less than Significant with Mitigation Incorporated (=)
Cultural Resources – Historic	Less than Significant	+	Less than Significant (=)
Noise and Vibration	Less than Significant	+	Less than Significant (+)
Public Health	Less than Significant	+	Less than Significant (=)
Transportation	Less than Significant	+	Less than Significant (=)
Waste Treatment and Disposal Facilities – Solid Waste Facilities	Less than Significant	+	Less than Significant (=)
Water Resources – Surface Water Quality	Less than Significant	=	Less than Significant (+)
Land Use and Planning	Less than Significant	=	Less than Significant (=)

+ Superior to the proposed project (reduced level of impact)
- Inferior to the proposed project (increased level of impact)
= Similar level of impact to the proposed project

As summarized in the *Executive Summary,* the proposed project would have no impact or a less than significant impact for the majority of environmental issues considered in this EIR. The proposed project would result in a significant and unavoidable impact to agricultural resources, as the development would result in the direct loss of 18.2 acres of Prime Farmland and Farmland of Statewide Importance to nonagricultural use.

The No Project Alternative would be the overall environmentally superior alternative because it would result in no impact or less than significant impacts to all environmental issues and would avoid all project impacts. However, the No Project Alternative would not achieve the project objectives as stated in Section 2, *Project Description,* of this EIR. Additionally, pursuant to the CEQA Guidelines, if the No Project Alternative is the environmentally superior alternative, the EIR shall

also identify an environmentally superior alternative among the other alternatives (Section 15126.6(e)(2) of the CEQA Guidelines).

Alternative 2 (Reduced Footprint) would generate impacts similar to or reduced in comparison to the proposed project. Nevertheless, this alternative would not avoid the project's significant and unavoidable impacts to agricultural resources, as development of a housing complex would still require the conversion of Prime Farmland and Farmland of Statewide Importance to nonagricultural use. In addition, Mitigation Measure AQ-1 and Mitigation Measure BIO-3 would still be required. After the No Project Alternative, Alternative 2 would be considered the environmentally superior alternative because it would result in lesser environmental impacts related to agricultural resources, air quality, and surface water quality. However, only one of the two community centers included in the proposed project would be constructed under Alternative 2. Furthermore, Alternative 2 would not include the basketball court, multiple play fields, or community garden included in the proposed project.

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7 References

7.1 Bibliography

Project Description

Camarillo, City of. 2019. Our Community, Our Basin, Our Watershed – North Pleasant Valley Desalter Facility Project. May 17, 2019. https://www.cityofcamarillo.org/Public%20Works/NPV%20Desalter%20fact%20sheet_v3%205172019.pdf (accessed April 2020).

_____. 2020. City Groundwater Desalter Project [webpage]. https://www.cityofcamarillo.org/desalter_info/index.php (accessed April 2020).

RRM Design Group. 2019. Somis Ranch Farmworker Housing Site Plan. October 25, 2019.

Ventura, County of. 2019. Figure 3.1, South Half, General Plan Land Use Map, from the Ventura County General Plan – Goals, Policies and Programs. Prepared December 23, 2016; last updated April 4, 2019. https://docs.vcrma.org/images/pdf/planning/maps/General_Plan_LandUse_South.pdf (accessed March 2020).

_____. 2020. Ventura County Non-Coastal Zoning Ordinance, Division 8, Chapter 1 of the Ventura County Ordinance Code. Last amended December 10, 2019; effective January 9, 2020. Ventura County Planning Division. https://docs.vcrma.org/images/pdf/planning/ordinances/VCNCZO_Current.pdf (accessed March 2020).

Water Resource Engineering Associates (WREA). 2019. Preliminary On-Site Wastewater Treatment System Design Report for Somis Ranch Farmworker Housing. October 23, 2019.

Air Quality

Baranski, Mike. 2017. Wastewater Treatment Odor Control Technology: Wet Scrubber Systems [webpage]. July 5, 2017. https://blog.cpsgrp.com/fabtechinc/wastewater-odor-control-technology-wet-scrubber-systems (accessed June 2020).

California Air Pollution Control Officers Association (CAPCOA). 2017. California Emissions Estimator Model User's Guide, Version 2016.3.2. November 2017.

California Air Resources Board (CARB). 2017. 2017 Amendments to the Health Risk Analysis.

_____. 2019. Area Designations Maps – State and National. https://ww2.arb.ca.gov/our-work/programs/state-and-federal-area-designations (accessed June 2020).

_____. 2020. iADAM: Air Quality Data Statistics. Available at: https://www.arb.ca.gov/adam (accessed June 2020).

California Climate Action Registry (CCAR). 2009. General Reporting Protocol. Reporting Entity-Wide Greenhouse Gas Emissions, Version 3.1.

California Department of Public Health. 2018. Epidemiologic Summary of Coccidioidomycosis in California, 2017. July 2018.

Ventura County Air Pollution Control District (VCAPCD). 2003. Ventura County Air Quality Assessment Guidelines. October 2003.

_____. 2017. Final 2016 Ventura County Air Quality Management Plan. February 14, 2017. http://www.vcapcd.org/AQMP-2016.htm (accessed June 2020).

Ventura, County of. 2011. Initial Study Assessment Guidelines. April 26, 2011. https://docs.vcrma.org/images/pdf/planning/ceqa/current_ISAG.pdf (accessed June 2020).

Agricultural Resources – Soils

California Department of Conservation (DOC). 2016. California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed June 2020).

Ventura, County of. 1992. Landscape Design Criteria. October 1992. http://docs.vcrma.org/images/pdf/planning/ordinances/Landscape-Design-Criteria.pdf (accessed June 2020).

_____. 2011. Initial Study Assessment Guidelines. April 26, 2011. https://docs.vcrma.org/images/pdf/planning/ceqa/current_ISAG.pdf (accessed June 2020).

_____. 2016. Ventura County Grand Jury 2015-2016 – Ventura County Crude Oil Pipelines, Final Report. April 12, 2016. https://vcportal.ventura.org/GDJ/docs/reports/2015-16/VC_Crude_Oil_Pipelines-04.16.16.pdf (accessed June 2020).

_____.2019a. The 2018 Crop and Livestock Report. July 2019. https://vcportal.ventura.org/AgComm/docs/crop-reports/Ag%20Comm%202018%20Crop%20Report%2008-02-19%20web.pdf

_____. 2019b. Ventura County General Plan – Goals, Policies, and Programs. Adopted May 24, 1988; last amended March 19, 2019. https://docs.vcrma.org/images/pdf/planning/plans/Goals-Policies-and-Programs.pdf (accessed June 2020).

Biological Resources

California Department of Fish and Wildlife (CDFW). 2020. Vegetation Classification and Mapping Program, List of California Vegetation Alliances.

California Invasive Plant Council (Cal-IPC). 2020. Cal-IPC Inventory. http://www.cal-ipc.org/plants/inventory/ (accessed May 2020).

Google Earth. 2020. Google Earth Pro. Earth Version 7.3.2.

Rincon Consultants, Inc. 2020. Somis Ranch Farmworker Housing Complex Initial Study Biological Assessment Report. July 1, 2020.

Spencer, W.D., P. Beier, K. Penrod, K. Winters, C. Paulman, H. Rustigian-Romsos, J. Strittholt, M. Parisi, and A. Pettler. 2010. California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California. February 2010. http://conservationcorridor.org/cpb/Spencer_et_al_2010.pdf.

United States Fish and Wildlife Service (USFWS). 2020. National Wetlands Inventory. https://www.fws.gov/wetlands/data/mapper.html (accessed May 2020).

Ventura, County of. 2011. Initial Study Assessment Guidelines. April 26, 2011. https://docs.vcrma.org/images/pdf/planning/ceqa/current_ISAG.pdf (accessed June 2020).

Cultural Resources – Historic

Bean, Walton

1968 California: An Interpretive History. McGraw-Hill Book Company, New York.

Cook, Sherburne F. and Robert F. Heizer

1965 The Quantitative Approach to the Relation Between Population and Settlement Size. University of California Archaeological Survey Reports, No. 64. Berkeley.

Dumke, Glenn S.

1944 The Boom of the Eighties in Southern California. Sixth printing, 1991. San Marino, California: Huntington Library Publications.

Franks, Kenny Arthur and Paul F. Lambert

1985 Early California Oil: A Photographic History, 1865-1940. Texas A&M University Press, College Station, Texas.

Gidney, Charles Montville

1917 History of Santa Barbara, San Luis Obispo and Ventura Counties, California. Lewis Publishing Company, San Luis Obispo County, California.

Glassow, Michael A, L. Wilcoxen, and J.M. Erlandson

1988 Cultural and Environmental Change during the Early Period of Santa Barbara Channel Prehistory. In The Archaeology of Prehistoric Coastlines. G. Bailey and J. Parkington, eds. Pp. 64–77. Cambridge, England: Cambridge University Press.

Grant, Campbell

1978a Chumash: Introduction. In Handbook of North American Indians, edited by William C. Sturtevant.

1978b Eastern Coastal Chumash. In Handbook of North American Indians, edited by William C. Sturtevant.

Guinn, J.M.

1977 Gold! Gold! Gold! from San Francisquito! In Los Angeles Biography of a City. John Caughey and LaRee Caughey, eds. Berkeley, California: University of California, Berkeley Press.

Hudson, Travis and Thomas C. Blackburn

1983 The Material Culture of the Chumash Interaction Sphere, Vol. II: Food Preparation and Shelter. Los Altos: Ballena Press. Anthropological Papers No. 25 (Ballena Press/Santa Barbara Museum of Natural History Cooperative Publication).

Jones, Terry L. and Kathryn A. Klar

2007 California Prehistory: Colonization, Culture, and Complexity. Berkeley, California: AltaMira Press.

Jones, Terry L., Richard T. Fitzgerald, Douglas J. Kennett, Charles Miksicek, John L. Fagan, John Sharp, and Jon M. Erlandson

2002 The Cross Creek Site and Its Implications for New World Colonization. American Antiquity 67:213–230.

Kowta, Makoto

1969 The Sayles Complex, A Late Milling Stone Assemblage from the Cajon Pass and the Ecological Implications of its Scraper Planes. University of California, Berkeley Publications in Anthropology 6:35–69.

Kroeber, Alfred J.

1925 Handbook of the Indians of California. Unabridged reprint 1976. New York, New York: Dover Publications, Inc.

Mason, Jesse D.

1883 History of Santa Barbara County, California. Thompson & West, Oakland, California.

McClellan, Doug

1992 "Centennial of Somis is a Small Affair: Communities: A walking tour and back-yard party mark today's celebration. The 400 residents call their town an oasis." Los Angeles Times. October 11, 1992. https://www.latimes.com/archives/la-xpm-1992-10-11-me-377-story.html (accessed June 2020).

Moratto, Michael

1984 California Archaeology. Orlando, Florida: Academic Press, Inc.

Nevin, David

1978 The Mexican War. Time-Life Books, Inc., Alexandria.

Perzel, Rachel, S. Zamudio-Gurrola, M. Pfeiffer, H. Haas, and S. Treffers

2020 Cultural Resources Assessment Report for the Somis Ranch Farmworker Housing Complex. Rincon Consultants, Inc. Project No. 20-09104. Report on file, South Central Coastal Information Center, California State University, Fullerton.

Rolle, Andrew

2003 California: A History. Wheeling, Illinois: Harlan Davidson, Inc.

Shumway, Burgess McK.

2007 California Ranchos: Patented Private Land Grants Listed by County. Rockville, Maryland: Borgo Press.

Sperry, Russell B.

2006 "History of the Santa Paula Branch." Santa Clara River Valley Railroad Historical Society. http://scrvrhs.com/branch.htm (accessed May 2020).

Stork, Yda Addis

1891 A Memorial and Biographical History of Santa Barbara, San Luis Obispo and Ventura County, California. The Lewis Publishing Company, Chicago.

Triem, Judith

1985 Ventura County: Land of Good Fortune. Windsor Publications, Northridge, California.

True, Delbert L.

1993 Bedrock Milling Elements as Indicators of Subsistence and Settlement Patterns in Northern San Diego County, California. Pacific Coast Archaeological Society Quarterly 29(2):1–26.

Ventura, County of.

2011 Initial Study Assessment Guidelines.

Ventura County Recorder

1892 "Map of the Town of Somis in Rancho Las Posas", 003MR033.

1948 Bard-Holbert Subdivision No. 1, 15MR68.

1953 Bard-Holbert Subdivision No. 2, 21MR75.

Wallace, William J.

1955 A Suggested Chronology for Southern California Coastal Archaeology. Southwestern Journal of Anthropology 11(3):214-230.

1978 Post-Pleistocene Archaeology, 9000 to 2000 B.C. In *California.* Volume 8: Handbook of North American Indians. Robert F. Heizer, ed. and William C. Sturtevant, general ed. Pp. 25-36. Washington, D.C.: Smithsonian Institution Scholarly Press.

Warren, Claude N.

1968 Cultural Tradition and Ecological Adaptation on the Southern California Coast in Archaic Prehistory in the Western United States. C. Irwin-Williams, ed. Eastern New Mexico University Contributions in Anthropology 1(3):1–14.

Westergaard, Waldemar

1920 "Thomas R. Bard and Ventura County's Sheep Industry, 1870-1884," Southern California Quarterly, vol. 11, part 3, 1920. Historical Society of Southern California, Los Angeles. Accessed March 16, 2020 on Google Books.

Workman, Boyle

1935 The City that Grew. Los Angeles, California: Southland Publication Company.

Noise and Vibration

California Department of Transportation (Caltrans). 2013a. Technical Noise Supplement to the Traffic Noise Analysis Protocol. CT-HWANP-RT-13-069.25.2. September 2013. http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf (accessed June 2020).

_____. 2013b. Transportation and Construction Vibration Guidance Manual. CT-HWANP-RT-13-069.25.3. September 2013. http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf (accessed June 2020).

Crocker, Malcolm J., editor. 2007. Handbook of Noise and Vibration Control Book. ISBN 978-0-471-39599-7. Wiley-VCH. October 2007.

Federal Highway Administration (FHWA). 2006. FHWA Highway Construction Noise Handbook. FHWAHEP-06-015; DOT-VNTSC-FHWA-06-02. November 2018. http://www.fhwa.dot.gov/environment/construction_noise/handbook (accessed June 2020).

Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment. November 2018. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed June 2020).

Kinsler, Lawrence E., Austin R. Frey, Alan B. Coppens, and James V. Sanders. 1999. Fundamentals of Acoustics, 4th Edition. ISBN 0-471-84789-5. Wiley-VCH. December 1999.

Ventura, County of. 2010. Construction Noise Thresholds Criteria and Control Plan. Published November 2005; last amended July 2010. https://docs.vcrma.org/images/pdf/planning/ceqa/Construction_Noise_Thresholds.pdf (accessed June 2020).

_____. 2011. Initial Study Assessment Guidelines. April 26, 2011. https://docs.vcrma.org/images/pdf/planning/ceqa/current_ISAG.pdf (accessed June 2020).

_____. 2013. Ventura County General Plan – Hazards Appendix. Adopted May 24, 1988; last amended October 22, 2013. https://docs.vcrma.org/images/pdf/planning/plans/General_Plan_Hazards_Appendix.pdf (accessed June 2020).

_____. 2019. Ventura County General Plan. Adopted May 24, 1988; last amended March 19, 2019. https://docs.vcrma.org/images/pdf/planning/plans/General-Plan-Resources-Appendix.pdf (accessed June 2020).

Public Health

Earth Systems Pacific (Earth Systems). 2019. Somis Ranch Seepage Pit Performance Test Report. September 24, 2019.

State Water Resources Control Board (SWRCB). 2018. Water Quality Control Policy for Recycled Water. December 11, 2018. https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2018/121118_7_final_amendment_oal.pdf (accessed June 2020).

_____. 2016. Water Reclamation Requirements for Recycled Water Use. Order WQ 2016-0068-DDW. June 7, 2016. https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2016/wqo2016_0068_ddw.pdf (accessed June 2020).

Ventura, County of. 2011. Initial Study Assessment Guidelines. April 26, 2011. https://docs.vcrma.org/images/pdf/planning/ceqa/current_ISAG.pdf (accessed June 2020).

_____. 2020. Septic/Wastewater [webpage]. https://vcrma.org/onsite-wastewater-treatment-systems (accessed June 2020).

Water Resource Engineering Associates (WREA). 2019. Preliminary On-Site Wastewater Treatment System Design Report for Somis Ranch Farmworker Housing. October 23, 2019.

WateReuse California. 2019. California WateReuse Action Plan. July 2019. https://watereuse.org/wp-content/uploads/2019/07/WateReuse-CA-Action-Plan_July-2019_r5-2.pdf (accessed June 2020).

Transportation

California Department of Transportation (Caltrans). 2017. Traffic Volumes on California State Highways. https://dot.ca.gov/programs/traffic-operations/census/traffic-volumes/2017 (accessed June 2020).

California Governor's Office of Planning and Research (OPR). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. December 2018. https://www.opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Camarillo, City of. 2014. City of Camarillo General Plan – Circulation Element 2014. Adopted January 12, 2000; last revised April 23, 2014. https://www.cityofcamarillo.org/Comm%20Dev/General%20Plan/05%20Circulation%20Element%202014.pdf (accessed June 2020).

Southern California Association of Governments (SCAG). 2016. 2016-2020 Regional Transportation Plan/Sustainable Communities Strategy. April 2016. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf

Ventura, County of. 2011. Initial Study Assessment Guidelines. April 26, 2011. https://docs.vcrma.org/images/pdf/planning/ceqa/current_ISAG.pdf (accessed June 2020).

Ventura County Transportation Commission. 2009. Ventura County Congestion Management Program, 2009 Update. Adopted July 10, 2009. https://www.goventura.org/work-with-vctc/publications/ (accessed June 2020).

Waste Treatment and Disposal Facilities – Solid Waste Facilities

CalRecycle. 2020. SWIS Data File. https://www2.calrecycle.ca.gov/Files/SWFacilities/Directory/SWIS.xls (accessed April 2020).

Harrison Industries. 2020. The History of E.J. Harrison [webpage]. 2020. http://www.ejharrison.com/about/about.html (accessed April 2020).

Ventura, County of. 2011. Initial Study Assessment Guidelines. April 26, 2011. https://docs.vcrma.org/images/pdf/planning/ceqa/current_ISAG.pdf (accessed June 2020).

Water Resource Engineering Associates (WREA). 2019. Preliminary On-Site Wastewater Treatment System Design Report for Somis Ranch Farmworker Housing. October 23, 2019.

Water Resources – Surface Water Quality

Bio Clean. 2020. Modular Wetlands System Linear: A Stormwater Biofiltration System. January 17, 2020. https://biocleanenvironmental.com/wp-content/uploads/2020/03/Modular-Wetlands_Brochure_01172020_web-2.pdf (accessed May 2020).

Jensen Design & Survey, Inc. 2019. Somis Ranch Farmworker Housing – Preliminary Hydrology Memorandum. November 1, 2019.

Los Angeles Regional Water Quality Control Board (RWQCB). 2020. Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. Last updated May 18, 2020. https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html (accessed May 2020).

State Water Resources Control Board (SWRCB). 2016. 2014 and 2016 California Integrated Report: Clean Water Act Section 303(d) List and 305(b) Report. https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml (accessed April 2020).

_____. 2020. Calleguas Creek Watershed [webpage]. https://www.waterboards.ca.gov/losangeles/water_issues/programs/regional_program/Water_Quality_and_Watersheds/calleguas_creek_watershed/summary.shtml (accessed April 2020).

Ventura, County of. 2011. Initial Study Assessment Guidelines. April 26, 2011. https://docs.vcrma.org/images/pdf/planning/ceqa/current_ISAG.pdf (accessed June 2020).

_____. 2020a. 2040 Ventura County General Plan Update – Background Report (2020). Revised Public Review Draft January 13, 2020. https://vc2040.org/images/Draft_EIR_-_Jan._2020/Draft_EIR_Apdx_B_2040_GPU_Bkgrd_Rpt_compressed.pdf (accessed April 2020).

_____. 2020b. County Stormwater Program [webpage]. https://www.onestoppermits.vcrma.org/departments/stormwater-program (accessed May 2020).

Water Resource Engineering Associates (WREA). 2019. Preliminary On-Site Wastewater Treatment System Design Report for Somis Ranch Farmworker Housing. October 23, 2019.

Land Use and Planning

Ventura, County of. 2019. Ventura County General Plan – Goals, Policies, and Programs. Adopted May 24, 1988; last amended March 19, 2019. https://docs.vcrma.org/images/pdf/planning/plans/Goals-Policies-and-Programs.pdf (accessed June 2020).

_____. 2020. Ventura County Non-Coastal Zoning Ordinance, Division 8, Chapter 1 of the Ventura County Ordinance Code. Last amended December 10, 2019; effective January 9, 2020. Ventura County Planning Division. https://docs.vcrma.org/images/pdf/planning/ordinances/VCNCZO_Current.pdf (accessed March 2020).

Less Than Significant Environmental Effects

California Air Resources Board (CARB). 2017. California's 2017 Climate Change Scoping Plan. November 2017. https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf (accessed June 2020).

California Department of Forestry and Fire Protection (CAL Fire). 2007. Ventura County Fire Hazard Severity Zones in SRA. November 7, 2007. https://osfm.fire.ca.gov/media/6848/fhszs_map56.pdf (accessed June 2020).

California Department of Resource Recycling and Recovery (CalRecycle). 2002. Toland Road Landfill (56-AA-0005). https://www2.calrecycle.ca.gov/swfacilities/Directory/56-AA-0005/ (accessed June 2020).

_____.2012. Simi Valley Landfill & Recycling Center (56-AA-0007). https://www2.calrecycle.ca.gov/swfacilities/Directory/56-AA-0007/ (accessed June 2020).

California Energy Commission (CEC). 2018. 2019 Building Energy Efficiency Standards. https://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf (accessed June 2020).

_____. 2019. Electricity Use by County. https://ecdms.energy.ca.gov/elecbycounty.aspx (accessed June 2020).

Earth Systems Pacific (Earth Systems). 2019. Somis Ranch Seepage Pit Performance Test Report. September 24, 2019.

Federal Emergency Management Agency (FEMA). 2015. Flood Insurance Rate Map No. 6111C0932F. Accessible at: https://msc.fema.gov/portal/search?AddressQuery=2789%20Somis%20Road%20%2C%20Camarillo#searchresultsanchor (accessed June 2020).

Southern California Association of Governments (SCAG). 2016. 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). April 7, 2016.

_____. 2020. Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. May 7, 2020. https://www.connectsocal.org/Documents/Adopted/fConnectSoCal-Plan.pdf (accessed June 2020).

Ventura, County of. 1992. Landscape Design Criteria. October 1992. http://docs.vcrma.org/images/pdf/planning/ordinances/Landscape-Design-Criteria.pdf (accessed June 2020).

_____. 2011. Initial Study Assessment Guidelines. April 26, 2011. https://docs.vcrma.org/images/pdf/planning/ceqa/current_ISAG.pdf (accessed June 2020).

_____. 2019. Ventura County General Plan – Goals, Policies, and Programs. Adopted May 24, 1988; last amended March 19, 2019. https://docs.vcrma.org/images/pdf/planning/plans/Goals-Policies-and-Programs.pdf (accessed June 2020).

_____. 2020a. 2040 Ventura County General Plan, Public Review Draft. January 2020. https://vc2040.org/images/Draft_2040_General_Plan_-_Jan._2020/VCGPU_Policy_Document_No_APs_January_2020_Public_Review_Draft.web-compressed.pdf (accessed June 2020).

_____. 2020b. County View – APN 156018048 [interactive map]. Tabular digital data and vector digital data. Ventura County Geographical Information System. http://gis.ventura.org/CountyViewNew/ (accessed May 2020).

Ventura County Water Works District No. 19 (Water District). 2019. Annual Water Quality Report.

Other CEQA Related Discussions

Southern California Association of Governments (SCAG). 2016. 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). April 7, 2016.

Water Resource Engineering Associates (WREA). 2019. Preliminary On-Site Wastewater Treatment System Design Report for Somis Ranch Farmworker Housing. October 23, 2019.

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