

4 ENVIRONMENTAL IMPACT ANALYSIS

APPROACH TO THE ENVIRONMENTAL ANALYSIS

This chapter discusses the potential environmental impacts of future development in unincorporated areas of the county under the 2040 General Plan. It is organized by environmental resource category. The existing conditions against which potential impacts are evaluated are based on the environmental and regulatory setting information published in the January 2020 Background Report, which is included in this draft EIR as Appendix B. The Background Report takes a “snapshot” of existing conditions and trends in Ventura County. It is divided into 12 chapters that cover a wide range of topics within the county, such as demographic and economic conditions, land use, public facilities, and environmental resources. The Background Report is objective and provides decision-makers, the public, and local agencies with context for making policy decisions. The Background Report also serves as the basis for the environmental and regulatory setting of this draft EIR. The County published the public review draft of the Background Report in March 2017, followed by a revised public review draft in October 2017, and subsequent revisions in January 2018 and January 2020.

Where changes to the environmental or regulatory setting (e.g., new information, regulatory changes) are not included in the Background Report and these changes are relevant to understanding the 2040 General Plan’s potential impacts, additional background information is provided in the draft EIR resource section. The reader is referred to the Background Report for all other setting information. Each resource section also provides a discussion of the potential environmental impacts (both direct and indirect) and identifies mitigation measures to reduce significant impacts, where appropriate and feasible.

In each of the resource-specific sections, the “Environmental Impacts and Mitigation Measures” subsection identifies the thresholds used to determine the level of significance of the environmental impacts for each resource topic, in accordance with State CEQA Guidelines Sections 15126, 15126.2, and 15143. The thresholds of significance are based on Ventura County’s Initial Study Assessment Guidelines (ISAG) (Ventura County 2011); the checklist presented in Appendix G of the State CEQA Guidelines; best available data; and the applicable regulatory standards of the County and federal and state agencies. As described in detail for each resource analysis, deviation from the ISAG thresholds, which were established by the County to evaluate the impacts of individual projects, was sometimes necessary to appropriately consider the programmatic nature of a general plan for the entire unincorporated area, and to incorporate the 2019 revisions to the Appendix G checklist. Further, where ISAG thresholds include consideration of cumulative impacts, this aspect of the threshold is addressed in Chapter 5, “Cumulative Impacts.”

As described in Chapter 3, “Project Description,” of this draft EIR, the population of the unincorporated area of the county is projected to grow from 97,733 (2015) to 101,832 (2040), an increase of 4,099 people in unincorporated areas of the county, based on projections published by the Southern California Association of Governments in the 2020 Regional Transportation Plan and Sustainable Communities Strategy (SCAG 2017) and pursuant to direction from the County of Ventura’s Board of Supervisors. This rate of growth, 4.2 percent between 2015 and 2040, is one of the assumptions underlying the analysis in this draft EIR. The environmental analysis also considers the following factors:

- ▶ Implementation of the general plan, in and of itself, does not result in the growth of population, households, employment, or traffic. Growth occurs from a dynamic system of birth, death, immigration, emigration, and other factors that include the state of the economy and land use options.
- ▶ The 2040 General Plan provides policies and implementation programs to concentrate future growth in communities where housing, commercial uses, and employment are already concentrated rather than in more rural, less developed areas. Although the 2040 General Plan encourages urban development in these areas, it does not discourage or prohibit all new development in rural areas. The County has land use authority over most unincorporated land in the county, but lacks land use authority within incorporated cities and land owned or managed by the state or federal government, such as Los Padres National Forest (which is located in the northern portion of the county and accounts for approximately 574,000 acres, or 47 percent of the county's total land area), San Nicolas Island, Anacapa Island, as well as state parks, state universities, and tribal lands. Outside of the Los Padres National Forest, in the southern portion of the county, there are approximately 121,000 acres in the county's 10 incorporated cities (10 percent) and 528,000 acres of land in the unincorporated area (43 percent). The unincorporated area within the southern portion of plan area under the land use authority of the County is the focus of the environmental analysis in this draft EIR.
- ▶ There are existing, local regulations related to growth management and future development within the county, including the Guidelines for Orderly Development, originally adopted by the Ventura Local Agency Formation Commission in 1969 and since adopted by the County of Ventura and the cities within the county, greenbelt agreements between the County and cities, and the County's Save Open Space & Agricultural Resources (SOAR) initiative. Among other things, the Guidelines for Orderly Development encourage urban development to occur within the county to be located in Existing Communities and unincorporated urban centers, and the SOAR initiative (which is part of the General Plan) generally requires countywide voter approval of any redesignation of land with an Agricultural, Open Space, or Rural land use designation in the General Plan to a less restrictive land use designation.
- ▶ The analysis is based on buildout of the plan area, even though buildout is not anticipated to occur within the planning horizon. The evaluation of environmental impacts focuses on the potential impacts of development within unincorporated areas of the county under the general plan through 2040, which is approximately 20 years from when approval of the 2040 General Plan is expected and a reasonably foreseeable forecast period.
- ▶ Land use designation changes proposed in the 2040 General Plan refine the Existing Community and Urban land use designations of the existing General Plan based on currently adopted zoning designations; and include additions (e.g., Parks and Recreation designation), removals (e.g., the Urban land use designation is changed to an Area Designation), and name changes (e.g., State/Federal to Public). The designations of the 2040 General Plan would more clearly distinguish among allowed land uses and set forth maximum development density and intensity standards relative to the existing General Plan.
- ▶ Many 2040 General Plan policies are intended to reduce the environmental impact of future development. When considering whether physical changes may result in an environmental impact, relevant proposed policies in the 2040 General Plan are first applied.

The 2040 General Plan is a policy document, as described further in Chapter 3, “Project Description.” Implementation of the 2040 General Plan could have a variety of social, political, and environmental effects. Adverse physical impacts to the environment associated with implementation of the 2040 General Plan are the focus of this environmental analysis. Physical changes could result from subsequent development pursuant to land use designations established in the 2040 General Plan, implementation of policies and implementation programs identified in the 2040 General Plan, and offsite or indirect development that is necessitated by the 2040 General Plan (e.g., new facilities, infrastructure upgrades). For the purpose of this environmental analysis, the types of actions that could result in physical changes to the environment under the 2040 General Plan are referred to collectively as “future development.”

In assessing impacts, this draft EIR uses the following standard terminology:

- ▶ “No impact” means no change from existing conditions (no mitigation is needed).
- ▶ “Less-than-significant impact” means no substantial adverse change in the physical environment (no mitigation is needed).
- ▶ “Potentially significant impact” means an impact that might cause a substantial adverse change in the environment (mitigation is recommended because potentially significant impacts are treated as significant).
- ▶ “Significant impact” means an impact that would cause a substantial adverse change in the physical environment (mitigation is recommended).
- ▶ “Significant and unavoidable impact” means an impact that would cause a substantial adverse change in the physical environment and that cannot be avoided, even with the implementation of all feasible mitigation.

The impact discussion is organized numerically in each section (e.g., Impact 4.2-1, Impact 4.2-2, Impact 4.2-3). The discussion that follows the impact statement includes the substantial evidence supporting the impact significance conclusion, which is provided in bold type at the end of the discussion. The following subsection provides potentially feasible mitigation measures, framed as new or revised policies or implementation programs that could lessen the impact of the 2040 General Plan. Per Public Resources Code Section 21061.1, feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and technological factors. Where mitigation measures are identified, a discussion of impact significance with the implementation of these measures follows.

The analyses evaluate the effectiveness of the 2040 General Plan policies and programs in avoiding or reducing the potential impacts of 2040 General Plan implementation. The level of significance for each impact is determined by comparing the impacts of physical changes anticipated with implementation of the 2040 General Plan to the environmental setting, with a focus on how land uses may be developed under 2040 General Plan policies and implementation programs. Where an existing law, regulation, or permit specifies mandatory and prescriptive actions about how to fulfill the regulatory requirement as part of the project definition, leaving little discretion in its implementation, and these actions would avoid an impact or limit it to a less-than-significant level, the environmental protection afforded by the regulation is considered before determining impact significance.

Note that the actions and evaluation procedures described in the ISAG are not considered to constitute such binding regulation, although the ISAG are routinely relied upon by County staff during project-level environmental reviews. Where potential for significant environmental impacts was identified, mitigation measures are proposed to reduce the level of impact in the form of new or revised policies or implementation programs. For the purpose of this draft EIR, these policies and programs constitute mitigation measures pursuant to Section 15126.4 of the State CEQA Guidelines and ensure that implementation of the 2040 General Plan includes a feasible reduction in environmental impacts in accordance with CEQA. This method of incorporating mitigation measures into a proposed plan is consistent with Section 15126.4(a)(2) of the State CEQA Guidelines. The set of new and revised policies and programs that could be included in the 2040 General Plan, will be presented before the Board of Supervisors when it considers whether to certify a Final EIR and adopt the 2040 General Plan; mitigation measures eventually included in the 2040 General Plan would be identified with an “EIR” designation to track their origin. New and revised policies and programs also would be assigned a policy number or implementation program letter upon incorporation into the 2040 General Plan. Because the ultimate designation is unknown at this time, all new policies and implementation programs developed as mitigation are designated herein as “X.”

This draft EIR does not include separate analyses for individual Area Plans, although a brief discussion is provided when an environmental issue is limited primarily to one or more of the Area Plan areas, and the Area Plan includes policies or programs not included in the 2040 General Plan that address the unique resources.